


MEMORANDUM

TO: Council, SSC, and AP Members

FROM: Clarence G. Pautzke  
Executive Director 

DATE: December 2, 1999

SUBJECT: Halibut Charterboat Management

ESTIMATED TIME 12 HOURS
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**ACTION REQUIRED**

Review analysis and release it for public review.

**BACKGROUND**

In September 1997, the Council adopted GHLs for the halibut charter fishery for IPHC Regulatory Areas 2C and 3A. The GHLs were based on the charter sector receiving 125% of their 1995 harvest (12.76% of the combined commercial/charter halibut quota in Area 2C, and 15.61% in Area 3A). The Council stated its intent that the GHLs would not close the fishery, but instead would trigger other management measures in years following attainment of the GHL. If end-of-season harvest data indicated that the charter sector likely would reach or exceed its area-specific GHL in the following season, NMFS would implement pre-approved measures to slow down charter halibut harvest. Given the one-year lag between the end of the fishing season and availability of that year's catch data, it was anticipated that it would take up to two years for management measures to be implemented.

In December 1997, NMFS Regional Administrator Steve Pennoyer informed the Council that the GHL would not be published as a regulation. Further, since the Council had not recommended specific management measures to be implemented by NMFS if the GHL were reached, no formal decision by the Secretary was required for the GHL. Therefore, the analysis was not forwarded for Secretarial review.

The Council responded by initiating a public process to identify GHL management measures. It formed a GHL Committee in 1998 to recommend management measures for analysis that would constrain charter harvests under the GHL. It met three times in 1998 and 1999. The Council discussed and approved the recommendations with modifications of the committee and Advisory Panel in 1998. It modified those alternatives based on staff, committee, and AP recommendations in early 1999 (a compilation of those recommendations are available from staff).

In April 1999, the Council identified for analysis: (1) a suite of GHL management measure alternatives; (2) alternatives that would change the GHL as approved in 1997; and (3) area-wide and LAMP moratorium options under all alternatives. Recognizing that (1) reliable in-season catch monitoring is not available for the halibut charter fishery; (2) in-season adjustments cannot be made to the commercial longline individual fishing quotas (IFQs); and (3) the Council's stated intent is to not shorten the current charter fishing season, the Council designed the alternatives to be measures that would be triggered in subsequent fishing years. The

alternatives are not mutually exclusive and may be combined when the Council makes its final decision in February 2000. The analysis was emailed to you on December 1 and the executive summary is attached as Item C-3(a).

To facilitate analysis, the preparers have provided restructured alternatives, mainly in response to concerns raised by the SSC. It maintains all the options and suboptions of the motion approved by the Council in April 1999. The restructured alternatives are attached as Item C-3(b).

## EXECUTIVE SUMMARY

## SUMMARY OF SECTION I

This analysis for a regulatory amendment assesses the potential economic and social impacts of implementing management measures to control halibut charter boat fisheries in International Pacific Halibut Commission (IPHC) Areas 2C (Southeast Alaska) and 3A (Southcentral Alaska). The need to manage the charter boat catch derives in large part from the method used by IPHC to calculate commercial halibut quotas. IPHC first calculates a constant exploitation yield (CEY), deducts non-commercial halibut harvests, and sets the remainder as the commercial quota. Currently there is no limit on the annual harvest of halibut by charter operations, lodges, and outfitters. Therefore, the above approach results in an open-ended reallocation from the commercial fishery to a growing recreational charter fishery.

In September 1997, the Council took final action on two management actions affecting the halibut charter fishery, culminating more than four years of discussion, debate, public testimony, and analysis:

Recordkeeping and reporting requirements. The Council approved recording and reporting requirements for the halibut charter fishery. To comply with this requirement, the Alaska Department of Fish and Game (ADF&G) Sport Fish Division, under the authority of the Alaska Board of Fisheries (BOF), implemented a Saltwater Sportfishing Charter Vessel Logbook (SCVL) in 1998. Information collected under this program includes: number of fish landed and/or released, date of landing, location of fishing, hours fished, number of clients, residence information, number of lines fished, ownership of the vessel, and the identity of the operator. This logbook information is essential for the analysis of charter moratorium alternatives. It complements additional sportfish data collected by the State of Alaska through the Statewide Harvest Survey (SWHS), conducted annually since 1977, and the on-site (creel and catch sampling) surveys conducted separately by ADF&G in both Southeast and Southcentral Alaska.

Guideline Harvest Levels in IPHC Areas 2C and 3A. The Council adopted GHLS for the halibut charter fishery, but only for IPHC Regulatory Areas 2C and 3A. They were based on the charter sector receiving 125% of their 1995 harvest (12.76% of the combined commercial/charter halibut quota in Area 2C, and 15.61% in Area 3A). The Council stated its intent that the GHLS would not close the fishery, but instead would trigger other management measures in years following attainment of the GHL. The overall intent was to maintain a stable charter season of historic length, using statewide and zone specific measures. If end-of-season harvest data indicated that the charter sector likely would reach or exceed its area-specific GHL in the following season, NMFS would implement the pre-approved measures to slow down charter halibut harvest. Given the one-year lag between the end of the fishing season and availability of that year's catch data, it was anticipated that it would take up to two years for management measures to be implemented. The Council also scheduled a review of halibut charterboat management for October 2000, though that may change as a result of current actions.

In December 1997, the NMFS Alaska Regional Administrator informed the Council that the GHL would not be published as a regulation. Further, since the Council had not recommended specific management measures to be implemented by NMFS if the GHL were reached, no formal decision by the Secretary was required for the GHL. Therefore, the analysis never was forwarded for Secretarial review.

After being notified that the 1997 GHL analysis would not be submitted for Secretarial review, the Council initiated a public process to identify GHL management measures. The Council formed a GHL Committee to recommend management measures for analysis that would constrain charter harvests under the GHL.

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In April 1999, the Council identified for analysis: (1) a suite of GHL management measure alternatives; (2) alternatives that would change the GHL as approved in 1997; and (3) area-wide and LAMP moratorium options under all alternatives. Recognizing that (1) reliable in-season catch monitoring is not available for the halibut charter fishery; (2) in-season adjustments cannot be made to the commercial longline individual fishing quotas (IFQs); and (3) the Council's stated intent is to not shorten the current charter fishing season, the Council designed the alternatives to be measures that would be triggered in subsequent fishing years. The alternatives are not mutually exclusive and may be combined when the Council makes its final decision in February 2000.

Alternative 1: No action. Do not develop regulations to implement a halibut Guideline Harvest Level.

Alternative 2: Convert the Guideline Harvest Level to an allocation.

The charter halibut fishery would be allocated 12.76% of the combined commercial and charter 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 charter 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 Guideline Harvest Level 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 are available), but prior to January 1 for industry stability. If the charter halibut harvest exceeds the upper limit of the range in a year, the charter fishery would be restricted to reduce the harvest back within the allocation range using management actions listed below. If the charter halibut harvest is restricted and the harvest is reduced below the lower limit of the range charter 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
- bag limits

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

Sub-option 1: Reduce the charter 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 charter allocation exceeds a specified percentage of the combined commercial and charter TAC. Percentages to be analyzed should include:

- a. 15%
- b. 20%



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- c. 25%

Sub-option 2: 1) Reduce the charter halibut allocation for conservation purposes by a set percentage in years of significant stock decline.

- a. 10%
- b. 15%
- c. 20%

and

2) The trigger for implementing the reduction would be based on total harvests and would be IPHC area-specific.

<u>Area 2C</u>	<u>Area 3A</u>
4 million lb	10 million lb
6 million lb	15 million lb
8 million lb	20 million lb

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

Sub-option 1: Reduce the charter 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 charter allocation exceeds a specified percentage of the combined commercial and charter TAC. Percentages to be analyzed should include:

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

Sub-option 2: 1) Reduce the charter halibut allocation for conservation purposes by a set percentage in years of significant stock decline.

- a. 10%
- b. 15%
- c. 20%

and

2) The trigger for implementing the reduction would be based on total harvests and would be IPHC area-specific.

<u>Area 2C</u>	<u>Area 3A</u>
4 million lb	10 million lb
6 million lb	15 million lb
8 million lb	20 million lb

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

- a. area-wide
- b. local

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Alternative 4: Under a GHL, apply a range of management measures listed below to curtail harvest 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
- bag limits

Option A: Area-wide moratorium  
Sub-option: Prohibit new charter licenses upon attainment of the GHL.

Option B: Local moratorium

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

### Years of participation

- Option 1: 1995, 1996, and 1997 IPHC and CFEC 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 number 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

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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)

To facilitate analysis, the preparers have provided restructured alternatives , mainly in response to concerns raised by the SSC. It maintains all the options and suboptions of the motion approved by the Council in April 1999.

Alternative 1: Status quo. Do not develop implementing regulations.

Alternative 2: Approve management measures to implement the halibut charter guideline harvest level

ISSUE 1: Apply GHLs to Areas 2C and/or 3A to trigger management measures as:

Option 1: Fixed percentage annually expressed in pounds.

Based on 1995: GHL equal to 12.76% in 2C, 15.61% in 3A.

Based on 1998: GHL equal to 18.01% in 2C, 13.85% in 3A.

Option 2: Fixed range in numbers of fish.

Based on 1995: GHL range equals 50 - 62 thousand fish in 2C; 138 - 172 thousand fish in 3A

Based on 1998: GHL range equals 61 - 76 thousand fish in 2C; 155 - 193 thousand fish in 3A

Under either option, the GHL would not close fisheries inseason, but would trigger management measures up to 2 years after attainment of the GHL (1 year if data are available), but prior to the start of the charter fishery season for industry stability.

ISSUE 2: Implement management measures. None to all of the following management measures 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. Restrictions would be tightened or liberalized as appropriate to achieve a charter harvest to below the GHL if a fixed percentage or within the GHL range, if a range.

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|--|--|
| <ul style="list-style-type: none"><li>• line limits</li><li>• boat limit</li><li>• annual angler limit</li><li>• vessel trip limit</li></ul> | <ul style="list-style-type: none"><li>• super-exclusive registration</li><li>• sport catcher vessel only area</li><li>• sportfish reserve</li><li>• rod permit</li></ul> |
|--|--|

Option: Close the charter fishery in-season once the GHL is reached.

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ISSUE 3: Under varying halibut abundance.

Option 1: Status quo. The GHL fixed percentage varies on an annual basis with area halibut abundance. (This is the current GHL approach adopted by the Council in 1997.)

Option 2: Reduce area-specific GHL ranges during years of significant stock decline.

Suboption 1: Reduce to 75-100% of base year amount when the charter allocation is predicted to exceed a specified percentage (options: 15, 20, or 25%) of the combined commercial and charter TAC.

Suboption 2: Reduce area-specific GHL by a set percentage (options: 10, 15 or 20%). The trigger for implementing the reduction would be based on total harvests and would be IPHC area-specific:

Area 2C Options

4 million lb

6 million lb

8 million lb

Area 3A Options

10 million lb

15 million lb

20 million lb

ISSUE 4: GHL or allocation

Option 1: Under a GHL and the current IPHC setline quota formula, halibut not harvested by the charter fleet in one year are rolled into the commercial setline quota the following year.

Option 2: Unharvested halibut would remain unharvested under a direct allocation to the charter sector.

Suboption: unharvested halibut banked in a sportfish reserve

ISSUE 5: Establish a moratorium for the halibut charter industry.

Option 1: Establish an area-wide moratorium

Option 2: Establish a local moratorium

Suboption: Prohibit new charter licenses upon attainment of the GHL.

**SUMMARY OF SECTION 2**

None of the alternatives under consideration would affect the prosecution of the halibut fisheries in a way not previously considered in consultations. The proposed alternatives are designed to improve the long-term productivity of halibut stocks in Sitka Sound. None of the alternatives would affect takes of listed species. Therefore, none of the alternatives are expected to have a significant impact on endangered or threatened species. None of the management alternatives is expected to have an effect on endangered or threatened species.

## SUMMARY OF SECTION 3

The two main criteria that determine if and when the GHGs, as presented in this analysis, will be reached or exceeded are: 1) the status of the halibut biomass and future biomass projections and 2) charter effort and projected growth of harvest. Section 3 provides the baseline data from the IPHC halibut stock assessment and descriptions of halibut harvests and participation by fishery sector and area from ADF&G statewide harvest surveys that are used in Sections 5 and 6 to prepare the RIR. Lastly, halibut biomass and charter fishery projections as presented to the Council in 1993 and 1997, and as currently updated in 1999, are discussed.

## Biology and total removals of Pacific halibut in Areas 2C and 3A

The halibut resource is healthy and total removals are at record levels. IPHC stock assessment models show a strong 1987 year-class. No strong year-classes are following, indicating that recruitment and ultimately, biomass, have peaked. Changes for Areas 2C and 3A over the past several years occurred as a result of changes to the stock assessment model more than as a result of biological changes. In the absence of model changes, short-term fluctuations in exploitable biomass, and therefore in quotas, should be small.

Landings in 1998 were among the top five highest years, at over 94 million pounds. Halibut harvests in 1998 in Area 2C totaled 12.9% and 75% of total removals for the charter and commercial fisheries, respectively. In Area 3A, those fisheries harvested 9.3% and 75%, respectively, in 1998. Non-guided sport halibut anglers harvested 6.9% and 5.6% in Areas 2C and 3A, respectively, in 1998.

## Projections of halibut biomass and quotas in Areas 2C and 3A

In 1993, ADF&G and IPHC staff reported that the coast-wide exploitable halibut biomass declined by 25% from 1988 to 1992, from 359 to 266 million pounds. In 1993, exploitable biomass was declining at about 10% per year. Continued biomass decline was predicted during 1993-97 at annual rates of 9, 7, 5, 3, and 1% per year. Halibut biomass was then predicted to increase from 1998 through 2000 at 1, 3, and 5% per year, respectively, due to increasing recruitment.

The 1997 analysis projected that, using an overall exploitation rate of 18% in 1998 and 20% every year thereafter, the expected halibut biomass would decrease by 32%, from an estimated 429 million pounds in 1998 to 292 million pounds in 2008 for the combined Areas 2A, 2B, 2C, 3A, and 3B. The projections had very wide confidence intervals due to environmental conditions. They predicted a substantially slower decline in exploitable halibut biomass than originally estimated in the 1993 report.

Since the development of these projections, the IPHC halibut stock assessment model was modified to account for an apparent 20% decrease in the length-at-age of halibut. The end result of all the changes to the IPHC model is that both halibut biomass and recruitment are considered to be *higher* than that estimated under previous stock assessment. These estimates are a result of changes to the IPHC model and not due to changes in the halibut stock. That is, it was not so much that the halibut stock increased as that the IPHC stock assessment could now detect the level more accurately.

The 1993 and 1997 projections of exploitable halibut biomass were compared with actual levels in 1994-98. Actual levels appear to fall within the projected range for 1997 and 1998 in the 1997 analysis and are substantially higher than the 1993 ADF&G and IPHC projections. In fact, the actual exploitable biomass levels in 1997 and 1998 are only slightly above the *expected value* of the 1997 projections. The 1997 projections appear to be appropriate to continue estimating future exploitable biomass levels in the near term.

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Halibut quota changes for Areas 2C and 3A over the past several years occurred as a result of changes to the stock assessment model more than as a result of biological changes. In the absence of model changes, short-term fluctuations in exploitable biomass, and therefore in catch limits, should be small. Recruitment represents a small fraction of the exploitable biomass, therefore, has a small annual effect. Increased selectivity over ages 8- to 12-yrs accounts for the majority of biomass added annually to offset natural mortality. The very large exploitable biomass relative to recruitment buffers the population from changes. However, because exploitable biomass has been at a high level, and because recruitment has declined over the past several years, lower exploitable biomass is more probable than higher exploitable biomass for the next five years. Exploitable biomass in Areas 2C and 3A, and therefore quotas, will range from constant over five years to a decline of 3-5% per year.

### Current charter harvest levels and projected growth

Little change occurred in charter halibut harvest (in pounds) from Area 2C during 1994-96 (an average of 970,000 lb net weight). A 12% drop to 853,000 lb occurred in 1997, followed by a near doubling of harvested biomass (1.77 million lb) in 1998. The 1998 logbook data confirmed this estimate.

The expected pattern for the halibut charter fishery is continued growth in the number of halibut taken in the sport fishery, but little change in average weight. In 1993, sport harvest increase was projected to follow a linear growth model through 2000. Taking the projected charter boat increase and halibut biomass changes into account, they concluded that projected sport harvest would reach about 33-50% of the commercial harvest in both Areas 2C and 3A by 2000.

In summary, two significant changes occurred in the Area 2C halibut charter fishery between 1997 and 1998: 1) the number of halibut harvested increased by 45%; and 2) the average weight of halibut increased by 43%. Less change occurred in the Area 3A halibut charter fishery between 1998 and 1999 than occurred in Area 2C: 1) the number of halibut harvested was approximately the same despite a decrease of 20% in client angler-days; and 2) the average weight of halibut decreased by only 6%.

### Current charter participation and projected growth

The number of unique active businesses and vessels was consistent for Area 2C, with 397 and 386 businesses and 581 and 588 vessels in 1998 and 1999, respectively. "Active" is defined as having reported bottomfishing effort on the SCVL. Approximately 87% of registered businesses and vessels in both years were owned by Alaska residents as indicated by permanent mailing address. For Area 3A, the number of unique active businesses was slightly higher in 1999 at 434 than 1998 at 422 as indicated logbook data. The number of unique active vessels was also slightly higher in 1999 at 501 than 1998 at 480. Approximately 96% of Area 3A registered businesses and vessels in both years were owned by Alaska residents as indicated by permanent mailing address.

A cursory comparison of businesses and vessels actively participating in the halibut charter industry would indicate that growth is flat, despite only two years of logbook data and the newness of the mandatory logbook requirement. A more detailed examination of active vessels in Section 6, however, identifies approximately 350 of the 1999 vessels as unique to that year (175 in each area). This indicates considerable exit and entry in this fishery between 1998 and 1999.

A total of 2,424 Alaska residents and 37,976 non-residents were Area 2C saltwater (all species) charter clients in 1998. Non-residents comprised between 86% and 100% of clients, with an average of 94% for all. Estimates for 1994-97 are not currently available. A total of 30,255 Alaska residents and 53,519 non-

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residents were Area 3A saltwater charter clients in 1998. Non-residents comprised between 56% and 93% of clients, with an average of 64% for all ports in the area.

The 1997 analysis developed new projections of the growth rate of the charter boat industry. Charter removals of halibut (total net weight of halibut) were expected to continue to increase, but at a declining rate. The analysis also stated that the total sport harvest of halibut had been increasing more slowly than prior reports indicated, averaging 6.4% annually from 1990 to 1995. There is considerable variation, however, in growth rates of harvest between fully capitalized locations in Alaska and those that are newly accessible. In addition, while the growth rate of halibut biomass taken in the sport harvest was averaging about 15% at the start of the 1980s, in 1997 it was reported to be substantially lower, about the same as the growth rate of the number of halibut harvested.

The 1997 analysis assumed two widely divergent bounds of higher and lower projections of the growth rate of charter boat removals of halibut. In 1995, the charter fishery accounted for 9.2% of the combined commercial/charter catch for all areas. Based on the expected values of halibut biomass discussed above, the analysis translated the 1997 projections of charter growth into charter share of the *total* halibut harvest at right for combined areas. The projected growth rate was 10.2% in Area 2C.

The actual growth rate for the halibut charter and non-charter fishery from 1990-1995 was similar to the 6.4% growth rate reported in the 1997 analysis. From 1990-1995, the combined sport fishery in Area 2C had a growth rate of 7.1%. This analysis updates this information; the average annual growth rate based on SWHS for Area 2C for 1994-98 was actually 10.8%, with wide variance between years. Halibut harvest increased 45% between 1997 and 1998. The 1998 logbook verified this estimate, but the logbook program did not exist in 1997 to verify the 1997 SWHS estimate. It is believed the SWHS may have underestimated charter catch and harvest in earlier years. If this is true, then the actual growth rate would have been higher.

The actual growth rate for the halibut charter and non-charter fishery from 1990-1995 did not reflect the linear increase as projected by ADF&G and IPHC in 1993, but was more similar to the 5.4% growth rate reported in the 1997 analysis. For 1990-1995, the combined sport fishery in Area 3A had a growth rate of 6.3%. The average annual growth rate based on SWHS for Area 3A for 1994-98 (5.1%) matched the 1997 projection.

In summary, a comparison of projected and actual rates of growth of the charter harvest with the combined charter/commercial harvest in Area 2C indicate that the projections from the 1997 analysis appear to reflect actual trends for 1994-98. Still two years shy of the 2000 projections, actual growth is bounded within the lower growth and higher growth projections. Actual growth for 1994 through 1998 in Area 3A appears to best approximate the lower growth rate projections for 2000 from the 1997 analysis. Therefore, it is appropriate to continue to use these projections to characterize future growth in the Area 2C charter fishery in the near term.

One of the principal factors in charter growth is directly related to tourism, particularly in Area 2C where nearly all charter clients are non-residents. The number of visitors to Alaska has grown over the past two decades, although the rate of growth has been declining in recent years. Annual growth in visitation averaged 10% between 1989 and 1994, and 12% each year for 1993 and 1994. Between 1994 and 1996, growth slowed to less than 6% per year, and since 1997, to less than 3% per year. The 1998 *summer* season marked Alaska's lowest growth rate in a decade at 1.3%, or about 1.1 million visitors, between May and September 1998. Recent years represent a substantial deviation from the 7.2% average *summer* growth seen since 1989. This slower, decreased rate of growth is predicted to continue for the next two to three years.

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### Baseline economic data for charter fishery

The monetary contribution that the guided halibut fishery makes to regional economies requires information on angler expenditures, effort (time spent fishing), and the portion of overall expenditures that are attributable to fishing. Information used in this study was primarily derived from a mail survey targeting persons sport fishing on the Kenai Peninsula conducted by Lee et al (1999), and analysis of that data conducted by Herrmann (1999). Alaskan residents tended to take more and longer trips than non-Alaskan residents, but spent less money per day. Alaskan residents also caught fewer halibut per day (1.69) than non-Alaskan residents (2.04).

### Angler expenditures

Angler expenditures are divided into fishing and non-fishing categories. Fishing expenses include items such as tackle, charter fees, and clothing. Non-fishing expenses cover daily living and transportation costs of the fishing trip. The expenditures in this analysis are based on information from the 1997 and 1998 fishing years.

### Average angler expenditures for Cook Inlet marine sport fisheries

Overall the average daily travel and living expenditures for Alaska and non-Alaska residents were \$44 and \$101, respectively. Fishing costs for Alaska and non-Alaska residents were \$47 and \$138, respectively. The values for Alaska residents were much lower because trips where fishing occurred on private boats and from shore were included in the data as well as charter trips. When the estimates were made for charter trips only, the fishing expenditures for Alaskan (\$141 - the charter itself cost \$128) and non-Alaskan (\$208 - the charter itself cost \$142) residents were closer to being equal.

Effort information from the 1998 and 1999 ADF&G logbooks were then combined with the daily fish expense information. Combining these two sources of information assumes that effort data from one year can appropriately be applied to expenditures from another year. The resulting values indicate that about \$19.3 million was spent as a result of charter boat fishing for halibut in the Cook Inlet off the Kenai Peninsula during 1998. Of the \$19.3 million, \$4.6 million (24 percent) was spent by Alaskan residents and \$14.7 million (76 percent) by non-Alaskan residents. About 81 percent of the money spent in Alaska was spent within the Kenai Peninsula. Expenditure estimates for 1999 were similar to those for 1998, because effort estimates from the 1999 log books were close to those in 1998.

### Applications to 3A

Average angler expenditures from the Cook Inlet study were applied to area 3A as a whole, but required some broad assumptions regarding characteristics of the 3A ports. Ports in 3A that may well have similar characteristics to the Cook Inlet ports are places like Seward. Charter clients can drive to Seward and it offers the similar living opportunities/cost structures to places like Homer. Yakutat, on the other hand, does not fit as well. Clients would be required to fly into Yakutat to fish, and the cost of living maybe higher. These differences mean that applying the Cook Inlet expense structure to Yakutat may yield misleading results. However, overall it is thought to be reasonable to apply Cook Inlet expenses to charter ports in 3A as a whole, since the Cook Inlet ports (and ports similar to the Cook Inlet ports) make up the majority of charter effort in 3A.

Fishing expenditures in Cook Inlet attributable to halibut charter fishing were \$15.0 million in 1998 (total expenditures were \$19.3 million). In 3A as a whole, \$18.0 million was spent on fishing expenditures attributable to the halibut charter fishery.



## Applications to 2C

The distribution of clientele residency, transportation cost to get to the port, reasons for being in the port (vacation versus fishing) are different in 2C when compared to 3A. Each of these factors change the expenditure patterns of charter clients. Because the cost structure of taking a charter trip in 3A and 2C are thought to be very different, the expenditure information from the Cook Inlet study has not been applied to 2C.

Some basic information on the cost of a charter trip is presented for 2C. Those data indicate that the prices paid for a charter trip are higher in 2C than in 3A. Trips out of Juneau, for example, are reported to cost \$150-\$220 per person (85 percent of the trips are for salmon), with the average trip costing \$180. Half-day trips have been quoted from \$150-\$190 per person, but these trips are likely only for salmon, because of the travel time to reach the halibut fishing grounds. In Petersburg, trips were quoted as costing \$165-\$170 per day.

## Commercial fisheries

Since 1977, the total commercial fishery catch in Alaska has ranged from 16 to 61 million. Beginning in 1981, catches began to increase annually and peaked in 1988. Catches have since declined, reaching a low of 44 million lb in 1995. The 70 million lb harvest in 1998 represented an 8% increase over 1997. Bycatch mortality, i.e., the catch of halibut in other groundfish fisheries, is the second largest source of removals from the stock, totaling approximately 13 million lb in 1998.

## Current commercial harvest levels and projected growth

Area 2C has the second largest commercial halibut TAC in Alaska. Peak area catches occurred in 1988 at 11 million lb. Since the beginning the IFQ fishery, 2C halibut harvests have ranged between 7.5 and 10.0 million pounds. During 1999, the 10 million lb quota was landed in 24 different ports. Eighteen were located in Alaska and accounted for 96 percent of Area 2C landings. Four were located in Washington state, one in Oregon, and one in Canada. In total, 3,448 separate halibut landings were made by vessels harvesting 2C halibut in 1999.

Area 3A has the largest commercial halibut TAC in Alaska. Since the beginning the IFQ fishery, 3A halibut harvests have ranged between 18 and 26 million pounds. The Area 3A quota peaked in 1988 at 38 million lb. During 1999, the 25 million lb quota was landed in 31 different ports. Twenty-three of the ports were located in Alaska and accounted for over 96 percent of the 3A landings. Five were located in Washington state, two in Oregon, and one in Canada. In total, 3,448 separate halibut landings were made by vessels harvesting 3A halibut in 1999.

## Current commercial participation

A total of 1,734 persons held quota share (QS) in Area 2C at the end of 1998, down 27% from initial issuance in 1995 (2,386 persons). More than half of Area 2C QS holders hold QS in amounts  $\leq 3,000$  (1998) pounds. The number of shareholders decline with increasing size of QS: 28%, 15%, and 4% hold QS between 3-10 thousand lb, 10-25 thousand lb, and  $> 25$  thousand lb, respectively. The majority of consolidation has occurred in persons holding less than 3,000 pounds of quota. Some consolidation of QS was expected when the IFQ program was approved. However, the Council did implement measures to ensure that small participants remained in the fishery. Those measures appear to have been successful.

## COUNCIL REVIEW DRAFT

A reduction of about 500 QS holders (about one-third of the initial recipients) has taken place in that class from the time of initial issuance through 1998. The number of persons holding more than 3,000 pounds of halibut quota has tended to remain more stable. However, the overall trend is for the number of persons in the smaller classes to shrink with the larger classes remaining stable or increasing.

A total of 2,348 persons held QS in Area 3A at the end of 1998, down 23% from initial issuance in 1996. Approximately half of Area 3A QS holders hold QS in amounts  $\leq 3,000$  (1998) pounds. The number of shareholders decline with increasing size of QS: 22%, 16%, and 13% hold QS between 3-10 thousand lb, 10-25 thousand lb, and  $> 25$  thousand lb, respectively.

About 82 percent of Area 2C QS holders are Alaska residents who hold about 84 percent of the halibut quota in 2C. The remaining QS is held by residents of 18 other States or Canadian residents. Seventy-six percent of QS holders that were not initially issued QS for halibut are Alaskan residents, as of year-end 1998, with the remaining 24 percent being non-residents. Nearly 15% of Area 2C QS were held by crew members. This indicates a fairly high rate of "buy-in" to the fishery by Alaskan residents. A small amount of acquired QS has been purchased by crewmen.

About 79 percent of Area 3A QS holders are Alaska residents; they held 64 percent of the 3A QS. Washington residents held over 24 percent of the QS, while only accounting for 12 percent of the people holding QS. Oregon residents held over 7 percent of the QS. Seventy-two percent of Area 3A QS held by non-initial recipients of quota are Alaskan residents, with the remaining 28 percent held by non-residents

A total of 836 vessels landed IFQs in Area 2C at the end of 1998. Consolidation has been occurring, with 1998 vessels down 24 percent from initial issuance and 53 percent from 1992. More than half of all vessels participating in the halibut IFQ program landed IFQs in Area 2C. A total of 3,118 landings were made by the vessels operating in Area 2C during 1998. On average, each vessel made about 3.7 landings. The 3,118 landings in Area 2C accounted for approximately 44 percent of all landings in the 1998 halibut fishery.

A total of 899 vessels landed IFQs in Area 3A during 1998, down 47 percent from initial issuance and 53 percent from 1992. Approximately 56 percent of all vessels participating in the halibut IFQ program landed IFQs in Area 3A. A total of 2,919 landings were made from fish harvested in Area 3A during 1998. Area 3A accounted for approximately 41 percent of the number of statewide halibut landings.

Catcher/sellers were the most common type of buyer permit issued in Area 2C. However, only 54 of the 587 catcher/seller permits were used to purchase halibut in 2C. The next largest category was shoreside processors. A total of 128 shoreside processor permits were issued for all of Alaska and 30 permits were used to purchase halibut in Area 2C.

Only 208 of the 859 registered buyer permits were used to purchase halibut in Area 3A during 1998. Most of the buyers that did purchase Area 3A halibut were in the catcher/seller (129 buyers) and shoreside processor (61 buyers) categories. No other category had more than seven active buyers in 1998.

### Background Economic Information on the Commercial Halibut Fishery

Ex-vessel prices for halibut in the commercial fishery increased statewide from 1992-96. The statewide average price of halibut in 1992 was \$0.98 and increased to \$2.24 in 1996. In 1997 the price dropped slightly to \$2.15, then fell sharply to \$1.26 in 1998. The large decrease in price for the 1998 fishing year reflected an overall decrease in fish prices that year were at least partially a result of weak Asian economies.

## COUNCIL REVIEW DRAFT

Ex-vessel halibut revenue in areas 2C and 3A were \$12.2 and \$52.3 million, respectively, in 1997. Revenues dropped to \$12.1 million (2C) and \$31.1 million (3A), in 1998. The decrease in revenue was primarily a result of the drop in ex-vessel price, as harvest amounts were fairly stable.

First wholesale prices also decreased from 1997 to 1998. Head and Gut products dropped from \$2.67 per pound in 1997 to \$1.91 in 1998. Overall the average wholesale price per pound across all product forms was \$2.77 in 1997 and \$2.05 in 1998.

First Wholesale revenues were derived from the Commercial Operator Annual Reports. Those data indicate that revenues at the first wholesale level increased from \$76 million in 1995 (the first year of the IFQ program), to \$130 million in 1997. In 1998, revenues declined to \$93 million.

The value of a unit of QS and its standardized value in terms of pounds of fish are reported for 1995-98. These data were derived from the RAM transfer files, and are reported in CFEC's 1999 IFQ study. QS prices increased from 1995-97 and then fell in 1998. This is the same trend that was observed for ex-vessel and first wholesale prices. The mean price of a pound of IFQ in area 2C was \$7.58 in 1995 and \$10.14 in 1998. This is a price increase of about 34 percent. In area 3A the price increased from \$7.37 in 1995 to \$8.55 in 1998, or a 16 percent increase. Therefore the relative IFQ transfer price has increased faster in area 2C than in 3A.

Commercial fishery costs were estimated for the halibut 1996 halibut fleet using an engineering and key informant approach. The results of that study indicated that a total of 132,160 skates were set in 1996, across IPHC areas 2C-4E. The cost of fishing that gear was estimated to be \$2.2 million in setting/retrieving costs, \$0.9 million in fuel, \$0.9 million in bait, and \$0.4 million in gear replacement costs. Processing and shipping costs were also estimated in that study. The costs varied depending on whether the product was sold fresh or frozen and the port the processing occurred. In general, processing costs were assumed to be \$0.30 per pound for fresh halibut and \$0.50 for frozen. Shipping costs varied by port, but the cost of shipping halibut fresh was 4 to 5 times as much as shipping frozen product.

### SUMMARY OF SECTION 4

not available

### SUMMARY OF SECTION 5

Information from ADF&G Sport Fish Division, charter associations, and earlier estimates from ISER indicate anywhere from 450 to 600 'active' charter vessels. In 1998 there were 1,085 vessels which participated in the logbook program with saltwater bottom fish activity (581 in Area 2C and 504 in Area 3A). No attempt was made to determine how many of those were 'full-time' operators. That number increased to 1,108 in 1999 (588 in Area 2C and 520 in Area 3A), with approximately 350 of those vessels being unique to 1999, indicating considerable entry/exit in this fishery from 1998-1999.

Earlier estimates from the 1997 study indicated that 402 'full-time' charter vessels, each operating at 50% load factor (operating 75% of available days at 66% seat capacity) could have taken the 1995 charter fleet harvest. Given the 1998 harvest level (an increase of about 30% over 1995 levels for total Area 2C and 3A pounds harvested, and 15% increase in total numbers of fish harvested), the estimate of full-time equivalent charter vessels would be between 462 and 522 vessels, without taking into account changes in the average weight of fish harvested.

The alternatives under consideration would qualify between 497 and 694 vessels, if 1998 logbook participation is required. These numbers are substantially less than the numbers actually participating in 1998

## COUNCIL REVIEW DRAFT

and 1999, based on the logbook information. Option 4 only requires participation in any year 1995-1998 and would qualify 2,073 vessels. Allowing supplementary information for qualification (other than IPHC license and/or 1998 logbook) could increase the number of qualifying participants.

The calculations were based on vessel participation history as opposed to individual (owner) participation history. However it is likely that the vessel numbers shown will closely approximate total permit numbers if the Council chooses to base qualification on owner participation history. Nevertheless, this decision is among the most critical with regard to a moratorium, in terms of granting permits to the appropriate recipients and minimizing disruption to the charter fleet in the initial allocation of permits; i.e., in many cases the current owner of a particular qualifying vessel may not be the individual owner associated with the vessel's qualifying catch history.

Although the total harvest capacity of the fleet is difficult to estimate, the currently licensed fleet (based on 1998 logbooks) has a harvest capacity well above the current harvest level, and even the currently active fleet is probably not operating at its maximum capacity. The presence of excess harvest capacity reduces the effectiveness of a moratorium and the ability to predict when it may become constraining on harvest. Only when latent capacity is filled would a moratorium become effective at maintaining harvest within the GHL.

Client demand may be the more effective limiting factor on growth in this industry sector than a moratorium, or a moratorium and quota limit, depending on where the limit is set.

The more restrictive moratorium options being considered may result in an effective moratorium; i.e., along with other management measures, may be effective at keeping the charter fleet within a GHL. This is particularly true if the GHL is set at a level higher than the current harvest level, and/or if it is set at a fixed poundage. A GHL based on a floating percentage, combined with declines in overall halibut biomass, reduce the likelihood of the moratorium's effectiveness; i.e., at low GHL levels, there likely will be excess capacity relative to that GHL under all options.

A moratorium would likely help promote economic stability for existing charter operators, particularly in areas where dramatic increases in participation have occurred recently. However, the issue of who receives the permit will also play an important role in determining future stability. Benefits derived by charter operators from a moratorium could be offset by losses to the charter clients in terms of potential price increases for charter trips.

Because a moratorium alone does not set aside a fixed portion of the exploitable yield for the guided fleet, there may be less down side risk to the commercial sector, when compared to a GHL which is a strict allocation, particularly in the short term (due to unharvested fish being left on the table).

The interrelationship, and potential conflicts, between an area-wide moratorium and local level (LAMP) moratoria needs to be considered. An area-wide moratorium may negatively impact the development of fisheries in areas without excess charter effort, without necessarily helping in areas that are already overcrowded. LAMP moratoriums may be more effective at resolving these local area issues, but likely would not be effective relative to attainment of GHL goals.

Because 1998 was the first year of the logbook program, there are concerns with the use of the 1998 logbook information as a basis for moratorium/license limitation qualification.

## SUMMARY OF SECTION 6

Alternative 1, no action, would result in continued unconstrained charter halibut harvests and a *de facto* reallocation of halibut from the commercial sector to the charter sector. This analysis assumes that sport halibut removals will increase by approximately 9 % in Area 2C and 4% in Area 3A for the charter sector and 1 percent in the unguided sector over the next 5 years. If that rate of growth does occur in future years, the ex-vessel gross revenues to the commercial fishery in areas 2C and 3A would decline by about 4 % per year. Given the current TAC and exvessel prices of \$2.10/lb (IPHC, pers. commun.). This amounts to a decrease of \$7.1 M in Area 2C and \$13.4 Min Area 3A in nominal dollars over the entire 2000-2005 time horizon.

Under Alternative 2, the guideline harvest level, by itself, has no management effect on either charter or commercial harvests. The associated management measures are the critical components of the program.

The following general picture of the halibut charter and commercial fisheries was drawn:

- halibut biomasses are at peak abundances, but likely to decline by 3-5% each year in the short-term;
- quotas are likely to remain steady;
- charter harvests are continuing to increase, but at declining rates;
- commercial quotas decline as charter harvests increase.

Five specific management issues have been identified which conform with the Council's April 1999 suite of alternatives, options and suboptions. This section draws the following conclusions regarding these issues.

**ISSUE 1:** Apply GHLS to Areas 2C and/or 3A to trigger management measures as a fixed percentage annually expressed in pounds or a fixed range in numbers of fish, based on 125% of 1995 or 1998 charter harvests.

In 1997, the Council adopted the GHLS based on a fixed percentage based on 1995 charter harvests. This equated to 12.76% of the combined charter harvest and commercial quota in Area 2C and 15.61% in Area 3A (as calculated in 1997). The Council is now considering altering that decision by adopting the GHLS as a fixed range of numbers of fish and revising the base year to 1998. This would revise the GHLS percentages to a fixed point somewhere between 12.76-18.01% in Area 2C and 13.84-15.61% in Area 3A and set the GHLS range between 50 - 76 thousand fish in Area 2C and 138 - 193 thousand fish in Area 3A. To address concerns regarding possible declines in halibut abundance, a set of reduction mechanisms are tied to the fixed range, which are addressed under Issue 3.

In determining whether the base year should be updated, the analysis examined higher and lower growth projections to estimate when the respective GHLS might be reached. From this:

- ADF&G harvest data appear to have exceeded the 1995-based GHLS in 1998. Therefore, had the 1997 GHLS decision been approved by the Secretary, GHLS management measures would be triggered for the next fishing season in Area 2C.
- the projected timeline suggests that under higher growth rates, the charter harvest in Area 2C could reach the 1998-based GHLS sometime during 2000 - 2001 and under lower growth rates, sometime during 2003 - 2004.
- Area 3A projections indicate that the 1995-based GHLS might be reached sometime during 1999 - 2000 under the higher projection and 2000 - 2001 under the lower projection.

COUNCIL REVIEW DRAFT

- the 1998-based GHL might be reached during 2000 - 2001 under the higher projection and during 2003 - 2004 under the lower projection.

In summary, the Council could set the percentage or range at any point within the ranges listed above. The obvious allocational impacts are that the higher the GHL is (in pounds or fish) in an area, the greater the allocation would be to the charter sector and the lower the quota assigned to the commercial sector.

**ISSUE 2:** Implement management measures, with an option to close the fishery in-season once the GHL is reached.

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

Of the ten measures to constrain charter harvests in future years to within the respective GHLS analyzed here, only bag limits and boat limits appear to limit charter harvests.

- the reduction in harvest effected by a bag limit will likely exceed the actual decrease in halibut that can be kept assuming that effort does not change. This is because effort can be expected to change as anglers react to the change in quality of the average halibut trip. Preliminary model runs estimate the change in participation resulting from a one-fish bag limit to be quite substantial in Area 3A, resulting in harvest levels that are much lower than necessary to-keep the charter sector below the GHL level. Allocative effects will on how these uncaught fish are distributed among the commercial and sport sectors.
- boat limits would result in the same amount of halibut being harvested on a trip as the bag limit alternatives, and , in fact, may result in higher harvests under the proposed "collective" or party fishing definition.
- line limits may redirect fishing effort between vessels, but is unlikely to further restrict harvest. A 6-line limit and restrictions of lines to number of paying passengers currently exists in Area 2CA; additional restrictions would limit vessels to a 4-packs or 5-packs. Nearly 90% of Area 2C charters took four clients in 1998, therefore, a 4-line limit may not result in adequate reductions to stay within the GHL. Area 3A charter vessels traditionally fish up to 27 lines. A floating scale for line limits may address traditional fishing patterns on larger sized vessels. A prohibition of fish harvested by crew may result in adequate harvest reduction to keep the harvest within the respective GHLS. Enforcement of lines "fished" would also be difficult.
- most charter clients take either two or four halibut in a year. A small percentage of avid anglers exceed that, indicating that annual angler limits will have less impact on total halibut removals compared with impacts on the amount of halibut taken by a few fishermen.
- only 4% of Areas 2C and 3A trips would be affected by limiting a vessel to one trip each day. If an average trip results in an average harvest, then a vessel trip limit may result in a harvest reduction of 4%. Recognizing the overcapacity of the fleet, clients will likely charter on another available vessel.
- superexclusive registration and Sport Catcher Vessel Only Areas may redistribute fishing effort but are unlikely to reduce halibut removals. They may be valid management tools to be included within a LAMP.
- a rod limit currently exists 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 of paying clients on board the vessel.

## COUNCIL REVIEW DRAFT

- an in-season closure is included as an option in the analysis. The Council and State of Alaska has indicated its interest in using management measures that would be triggered for a subsequent fishing season rather than closing the fishery in-season due to data and management concerns.

The sportfish reserve would nullify the constraining effect of the GHL by reallocating halibut from the commercial sector to the charter sector when the GHL would trigger a reduction.

### ISSUE 3: Adjust the GHL fixed range of fish under varying halibut abundance.

Adjusting the GHL range during years of low abundance becomes moot if the Council chooses to set the GHL as a fixed percentage. Alternatively, if the Council adopts the GHL as a fixed range (Issue 1 Option 2), then the Council must decide whether and how to apply that range in years of low halibut abundance.

Suboptions 1 and 2 reduce the GHL range at very different levels of abundance. Suboption 1 proposes to reduce a GHL range by 25% when it exceeds 15%, 20%, or 25% of the combined charter/commercial quota during years of varying abundance. The suboption links the combined quota in pounds to the range of fish in numbers. The combined quota triggers levels equate to approximately 3.7, 4.9, and 7.0 M lb in Area 2C and 6.6, 8.8, and 12.5 M lb in Area 3A.

Suboption 2 would not trigger reductions in the range until total harvests had been reduced by 42-70%, depending on the Council's preferred alternative. Three choices are included in the analysis for levels to reduce the range, depending on the base year. Proposed total removal trigger levels are 4, 6, and 8 M lb for Area 2C and 10, 15, and 20 M lb for Area 3A. The lowest levels match the lowest total removals ever recorded and stocks associated with those levels could be considered depressed. The highest proposed triggers are approximately 20% below 'typical' levels of total removals. The intermediate triggers would be somewhere in between.

### ISSUE 4: Determine whether a GHL or allocation

Option 1 is tied to the Council's interpretation that the GHL is a target against which the level of charter harvests are gauged to determine if management measures need to be invoked to further constrain those levels. Under Option 1, the difference in halibut that could be harvested by charter anglers under the GHL and what is annually harvested, would in effect "roll over" to the commercial sector at the start of the season.

Option 2 is distinct from Option 1 in that as an allocation, the commercial sector would not accrue the full benefit of any unharvested GHL halibut in the subsequent year. While the overall CEY will likely be higher because fewer removals occurred, the commercial sector would be constrained by its allocation percentage that will be adopted by the Council.

The next issue under Option 2 to be considered by the Council is whether the unharvested halibut should accrue conceptually in a sportfish reserve. Charter sector proponents of "banking" unharvested fish in such a system have defined the reserve such that unharvested fish would not accrue "pound for pound" in the reserve, but that the sector would get a credit for those unharvested fish when the GHL is constraining on their clients. In summary, a sportfish reserve negates the effects of a GHL by "reallocating" additional halibut to the charter sector when that sector's harvests would exceed the GHL and trigger constraining management measures. This reallocation would be redirected from the commercial quota.

**ISSUE 5:** Establish a moratorium, either area-wide local

Area-wide and local moratorium options were analyzed separately in Section 5. Those conclusions that relate to the GHL are repeated here.

- The alternatives would qualify between 497 and 694 vessels, if 1998 logbook participation is required. These numbers are substantially less than the numbers actually participating in 1998 and 1999, based on the logbook information. Option 4 only requires participation in any year 1995-1998 and would qualify 2,073 vessels. Allowing supplementary information for qualification (other than IPHC license and/or 1998 logbook) could increase the number of qualifying participants.
- Although the total harvest capacity of the fleet is difficult to estimate, the currently licensed fleet (based on 1998 logbooks) has a harvest capacity well above the current harvest level, and even the currently active fleet is probably not operating at its maximum capacity. The presence of excess harvest capacity reduces the effectiveness of a moratorium and the ability to predict when it may become constraining on harvest. Only when latent capacity is filled would a moratorium become effective at maintaining harvest within the GHL.
- The more restrictive moratorium options being considered may result in an effective moratorium; i.e., along with other management measures, may be effective at keeping the charter fleet within a GHL. This is particularly true if the GHL is set at a level higher than the current harvest level, and/or if it is set at a fixed poundage. A GHL based on a floating percentage, combined with declines in overall halibut biomass, reduce the likelihood of the moratorium's effectiveness; i.e., at low GHL levels, there likely will be excess capacity relative to that GHL under all options.

**Administration**

To enhance efficiency and ensure that necessary measures are invoked in a timely manner, non-discretionary measures may be enacted such that their implementation occurs automatically upon the charter fleet's attaining or exceeding the GHL by publication of a Federal Register notice. The regulatory amendment would also establish the duration of such management measures and the circumstances upon which such measures would be lifted. To minimize delay of imposition of triggered GHL management measures, the Council could either: 1) select only one management measure that would be triggered if a GHL is attained or exceeded; or 2) select multiple measures that would all be implemented simultaneously.

**SUMMARY OF SECTION 7**

Some of the alternatives under consideration could result in a significant impact on a substantial number of small entities. A more definitive assessment will depend on the alternatives (and specific options such as downstream management measures) selected by the Council. A formal IRFA focusing on the preferred alternative(s) will be included in the package for Secretarial review.



## COUNCIL REVIEW DRAFT

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**STAFF-RESTRUCTURED ALTERNATIVES**

The restructured alternatives better identify the five main issues being addressed by the Council in the GHIL analysis: (1) the level and application of the GHILs, (2) types of management measures, (3) adjustments for periods of low halibut abundance, (4) treatment of the GHIL as an allocation, and (5) whether or not to apply a moratorium.

Alternative 1: Status quo. Do not develop implementing regulations.

Alternative 2: Approve management measures to implement the halibut charter guideline harvest level

**ISSUE 1:** Apply GHILs to Areas 2C and/or 3A to trigger management measures as:

Option 1: Fixed percentage annually expressed in pounds.

Based on 1995: GHIL equal to 12.76% in 2C, 15.61% in 3A.

Based on 1998: GHIL equal to 18.01% in 2C, 13.85% in 3A.

Option 2: Fixed range in numbers of fish.

Based on 1995: GHIL range equals 50 - 62 thousand fish in 2C; 138 - 172 thousand fish in 3A

Based on 1998: GHIL range equals 61 - 76 thousand fish in 2C; 155 - 193 thousand fish in 3A

Under either option, the GHIL would not close fisheries inseason, but would trigger management measures up to 2 years after attainment of the GHIL (1 year if data are available), but prior to the start of the charter fishery season for industry stability.

**ISSUE 2:** Implement management measures. None to all of the following management measures would be implemented up to 2 years after attainment of the GHIL (1 year if data is available), but prior to January 1 for industry stability. Restrictions would be tightened or liberalized as appropriate to achieve a charter harvest to below the GHIL if a fixed percentage or within the GHIL range, if a range.

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

Option: Close the charter fishery in-season once the GHIL is reached.

ISSUE 3: Under varying halibut abundance.

Option 1: Status quo. The GHL fixed percentage varies on an annual basis with area halibut abundance. (This is the current GHL approach adopted by the Council in 1997.)

Option 2: Reduce area-specific GHL ranges during years of significant stock decline.

Suboption 1: Reduce to 75-100% of base year amount when the charter allocation is predicted to exceed a specified percentage (options: 15, 20, or 25%) of the combined commercial and charter TAC.

Suboption 2: Reduce area-specific GHL by a set percentage (options: 10, 15 or 20%). The trigger for implementing the reduction would be based on total harvests and would be IPHC area-specific:

Area 2C Options

4 million lb

6 million lb

8 million lb

Area 3A Options

10 million lb

15 million lb

20 million lb

ISSUE 4: GHL or allocation

Option 1: Under a GHL and the current IPHC setline quota formula, halibut not harvested by the charter fleet in one year are rolled into the commercial setline quota the following year.

Option 2: Unharvested halibut would remain unharvested under a direct allocation to the charter sector.

Suboption: unharvested halibut banked in a sportfish reserve

ISSUE 5: Establish a moratorium for the halibut charter industry.

Option 1: Establish an area-wide moratorium

Option 2: Establish a local moratorium

Suboption: Prohibit new charter licenses upon attainment of the GHL.

**Comments Received  
Halibut Charter GHL**

March 20, 1999

Alaska Board of Fish  
ADF&G Board Section  
Box 25526  
Juneau, AK 99802

*NPFMC*

Gentlemen:

It is my understanding that there is some momentum towards putting a cap on the number of halibut charter boats, and initiating a quota for those operations. Many commercial fisheries are currently undergoing drastic levels of change due to a variety of reasons. It would seem wise to go slowly on this proposal, leaving as much flexibility for adapting to coming changes as possible.

Our salmon fisheries have had to face new directions due to a number of factors: salmon farm production, peace and trade with Russia, shifting and declining economies in traditional markets (i.e. Japan), and changing conditions of a global nature at sea. As changes occur, new methods of harvest and allocation need to be explored and utilized.

Halibut charter fishing is traditional and growing in communities like Homer and Seward where roads exist. In Cordova, where there is no direct road access, halibut charter fishing is in its developmental stages. As those of us who live here struggle to adapt to the changing times, halibut charters could be an important part of what we turn to in order to make a living and remain here. At the moment only a handful of boats are sporadically working this fishery. It would certainly be too bad if that door was closed before it even had an opportunity to be opened. There is some excellent halibut fishing close to Cordova in Prince William Sound and the Gulf of Alaska.

I began commercial fishing out of Cordova in 1963. Now, as I move into my 60's, salmon and herring incomes decline, and a more leisurely life of guiding tourists is my plan.

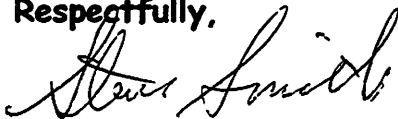
Cordova has much to offer a visitor: a spectacular glacier along the Copper River Highway at 52 Mile, grand scenery of rugged coastal mountains, the rich expanse of the Copper River Delta, the bays and fjords of Prince William Sound, birds and wildlife, friendly people, fresh water fishing for salmon and trout, and saltwater trips for halibut and

other fish species. My personal plan has been tested and would indicate a healthy interest in multiple-day trips with a diversity of activities. An overnight halibut fishing trip is a key element in this itinerary.

An article is included on the coming of age of halibut farming. As salmon farms have cut into the markets of wild salmon, the same may be true for halibut! As times change, we will need room to innovate. Isolated coastal villages have limited economic opportunities and need to be able to use what resources they have in a changing economic and social environment.

Our civilian Fish and Game Boards have an outstanding reputation for managing our resources. Keep up the good work and thank you for taking the time, and making sacrifices to serve on this board.

Respectfully,



Steven R. Smith

PO Box 1724

Cordova, AK 99574

June 10, 1999

Chairman Richard Lauber  
North Pacific Fishery Management Council  
605 W. 4th Ave. #306  
Anchorage, AK. 99501-2252

RECEIVED

JUN 16 1999

N.P.F.M.C

Dear Sir:

I am a Charterboat operator out of Homer Alaska. I have been guiding in Alaska for 20 years and in business for myself since 1993. I have been following the actions of the North Pacific Fisheries Management Council (NPFMC) as they have responded to a group of commercial longliners request to limit the charterboat halibut fishery. At first I didn't take the issue seriously as I believed that our catch (total sportfishing including private catch) represented a relatively small percentage of the total halibut catch leaving the lions share to the commercial fishery. The current thick percentage enjoyed by the commercial industry should make any reasonable group happy. However; it appears, with some of the recent decisions made by NPFMC (obviously pushed through due to the tremendous lobbying power and money controlled by the commercial interests), that the commercial fishing interests are not happy with just more of the fish; they seem to want all the fish!

It's easy to see what is happening here and why the commercial industry is trying to limit sportfishermen. Limiting the catch of sportfishermen benefits the commercial interests in two main ways: first, commercial interests could then catch and waste more fish and make more money; second, since public access to fishing will be curtailed, if the public wants fish they must buy them from the commercial interests and the commercial interests make more money.

Sir, I ask you; whose fish are these anyway? Are they not the public's fish? Can it be legal for one private group to claim ownership of an entire fishery and attempt to put everyone else who makes a modest living off of the fishery out of business, or to restrict the public from enjoying the resource? What do I tell my clients (the voting public) who come from all over the United States to fish in Alaska when, two thirds of the way through the summer season, the sport charter halibut fishery is shut down so that the commercial industry can continue to dump tons of halibut overboard (in the form of incidental bycatch) or make a few million more dollars at the public's expense?

While no industry can claim to be completely benign to a natural resource when a main aspect of that industry involves harvesting from natural stocks, it can be easily argued that the charterboat industry (and sportfishing in general) is much less harmful to halibut stocks than the commercial industry. The commercial industry is allowed (by law!) to waste many tons of halibut (the same order of magnitude as the entire sportfishing harvest, including charterboat harvest) in order to harvest other species like pollock. We sportfisherman have to be careful to get as much meat as we can off of a fish when we fillet it or we get ticketed for waste of a sportfish.

This issue is a classic example of an organized attempt by a large and powerful industry to control a public resource out of pure greed. How can sportfishermen compete against commercial industry giants who can spare no expense to mobilize herds of lawyers and accountants to argue their case?

Sir, I urge you to help us in any way you can to not allow the NPFMC to make such obviously lopsided decisions concerning a public resource. I am not for shutting down the commercial industry, or any industry for that matter. I am for fair and reasonable alternatives that allow all sides to continue to exist while maintaining healthy halibut stocks and allow for priority public access to the fishery. The current NPFMC efforts to cap the guided sportfish catch and issue a moratorium on new charterboat businesses (and on the growth of existing ones), thus, limiting public access to the fishery so that the commercial interests can continue to harvest and waste a vast majority of the fish, is completely unreasonable. Bottom line: a charterboat harvest cap and a moratorium on the growth of the charterboat industry is equivalent to a

June 10, 1999  
Chairman Richard Lauber  
Page 2

harvest cap and moratorium for any member of the fishing public that does not own or have access to a boat capable of getting to the fishing grounds (i.e. most of us poor folks). The halibut fishery and all fisheries are a public resource and the public should have first rights to it. Only after the public right has been exercised and the health of the fish stocks has been secured should private commercial enterprise be allowed to harvest safe numbers of the resource.

One reasonable alternative might be to give the commercial industry 50% of the allowed catch as long as public demand for sportfishing allowed it. Who, but someone that is completely unreasonable, could object to sharing the fish equally? This leaves 50% of the fishable resource available for public use and enjoyment while still supplying 50% of a public resource to the private commercial industry (still the lions share if you consider the number of voting sportfishermen as compared to the number of voting commercial fishermen). If the commercial industry cannot survive with an equal share of the fish, then maybe it is time to reexamine the commercial industry to determine if major changes need to be made to it. Indeed, if the commercial fishery requires 80% to 90% of the resource to survive (as the commercial industry contends) an evaluation of the commercial industry may be in order to bring its usage of the resource in line with increasing public demand for the resource. Additionally, considering the commercial interests control 80% to 90 % of the resource leaving a scant 10% to 20% for everyone else, it stands to reason that the commercial interests have much more room to share the fishery. Isn't the NPFMC trying to limit the group that has already been grossly limited by a historically commercially dominated system: the group that has the least amount of the resource to give up: the group to whom the fish (a public resource) truly belong: the people of the United States?

Decimated fish populations on the East Coast and the West Coast of the United States, much of which can be blamed on commercial over-fishing comes to mind. Now nobody catches fish in these areas, commercial or sportfishermen alike. Couldn't the same thing happen in Alaska, one of the only viable fisheries left in the United States, if the commercial interests and greed are allowed to make the rules? Let's not put the foxes in charge of the hen house.

Thank you for your time.

Sincerely,



Mike Field  
Owner, Alasking Charters - Homer , Alaska



# *Polar Star, Inc.*

*Patrick and Deana Pikus*

*P. O. Box 2843*

*Kodiak, Alaska 99615*

*(907) 486-5258 Fax (907) 486-5413*

*WJ*  
**JUL 27 1999**

North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Ave.  
Anchorage, Alaska 99501-2248

Dear Chairman Lauber,

July 25, 1999

I am a commercial fisherman who has fished in Alaska for 36 years. My father was a commercial fisherman. My life and livelihood is commercial fishing. My commercial fishing activities have primarily focused on salmon, halibut, black cod, crab, and pacific cod. Since the beginning of the IFQ program, I have invested over \$500,000 in the purchase of halibut and black cod IFQ's. The commercial halibut fishery is very important to me, and to the several families that are represented by the crew persons that I employ. I own and operate 2 halibut longline vessels, the F/V Polar Star, and the F/V Miss Lori.

The IFQ program was imposed on the halibut commercial fishery because of the need to manage and control effort and harvests for conservation reasons. There has been a significant expansion of participants, capitalization and effort in the commercial charter boat industry. The commercial charter boat industry should be recognized for what they are, that is, a commercial enterprise. However, the commercial charter boat industry has never been restricted or managed. Moreover, it appears that the commercial charter boat fleet feels that they should be able to continue to expand their industry and their catch without reasonable and necessary regulations. The commercial charter boat fleet should be limited in the same way that the commercial halibut fleet is limited.

Many of us in the longline fishery, (halibut-sablefish), were against the IFQ system, not because of it's safer harvest method or better market conditions. Quite frankly, we were against IFQ's because we knew where most of the quota shares would end up. Never the less, the system was put into place. To maintain a similar position in the halibut-sablefish fishery I've had to purchase quota, which meant going into debt. I feel quite strongly that other commercial users should not be granted access to the resource other than their historic average.

Establishing a set harvest limit for the commercial charter boat fleet by setting a fixed poundage allocation for them is not acceptable. The commercial charter boat fleet should be limited by the same abundance-based system that is used to manage other fisheries in Alaska. Granting a priority preference to the commercial charter boat industry is harmful to the commercial halibut industry, and other users. The commercial charterboat fleet should have a program that controls and limits their participation. They should not expand and grow at the expense of the commercial halibut industry by taking quota away from the commercial fishing industry, and other users.

I support the councils recommendation as of October 1997, for abundance based management of the commercial charterboat fleet that is in line with their historic catch performance, also, I would appreciate your rejection of the "fixed poundage" concept.

Sincerely



Patrick J. Pikus

## **F/V Viking Star**

Thorvold Olsen  
P.O. Box 322  
Kodiak, AK 99615  
telephone: 907-486-5387  
fax: 907-486-8126  
July 26, 1999

**RECEIVED**  
JUL 28 1999  
N.P.F.M.C

Mr. Richard Lauber  
Chairman  
North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501

Dear Mr. Lauber,

I am the owner/operator of the F/V Viking Star. I have been commercial fishing in Alaska all of my life, and my livelihood is totally based on commercial fishing. My father was a commercial fisherman also. I have been commercial longlining for halibut for approximately 36 years, and commercial halibut fishing has always been a large and important part of my overall commercial fishing business.

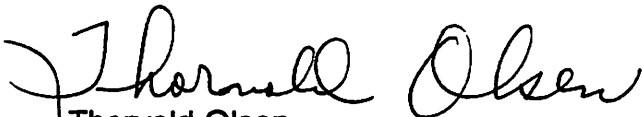
The commercial charter halibut problem is an uncontrolled, run away, commercial fishery. They operate under the guise of a sports operation.

All of us commercial fishermen follow limits, seasons, quotas, etc.

The local people are having a hard time finding halibut near the town of Kodiak because the halibut have been fished out by the commercial charter operators. The deer populations have also been hit hard by the commercial charter boat operators.

This runaway commercial charter halibut fishery has to be stopped and brought back to the level that it was 10 years ago.

Sincerely,

  
Thorvold Olsen  
F/V Viking Star

Bill Harrington  
Dab, B&E Fisheries  
Box 8166  
Kodiak Alaska 99615  
(907-486-9488)

RECEIVED  
JUL 28 1999  
N.P.F.M.C

North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Ave.  
Anchorage, Alaska 99501-2248

Dear Chairman Lauber

July 26, 1999

I have been a commercial fisherman for 30 years. The last 20 I have fished out of Kodiak. For 10 years before that I fished on the East Coast, out of Massachusetts ports. My two children were schooled in Alaska, and my fishing has paid to send them to two good colleges.

I now operate the F/V Miss Lori and have done so since 1984 longlining blackcod and halibut. As a non-owner I was unfortunately left out of IFQ ownership but have fortunately been able to continue fishing the IFQs that were issued to the boat, and am a registered buyer. These fisheries and Pacific cod have been my total means of support for many years.

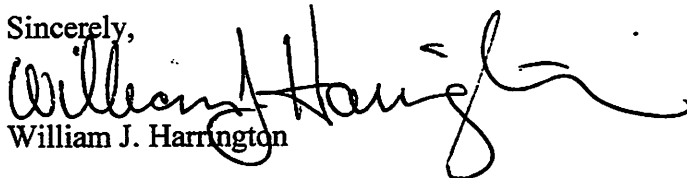
Although the IFQ program may have it's inequities, it has kept a sustainable fishery going and made it a safer pursuit.

Now I have heard that the Commercial Charter Boat Industry is lobbying for a fixed quota system, regardless of stock abundance or fluctuations in the amount of halibut quota available for other users. Certain of these charter boats, or should I say many, are already catching more fish for their clients than I am allowed to catch, without spending a dime to purchase shares of the quota. There seems to be some inequity in this policy, being that we are both commercial enterprises.

I believe that the fixed poundage allocation for the charter fleet is intrinsically unfair. I am not certain what the best solution would be, but if I have to live through the up and downswings of quota share, the charter operators should as well.

The council recommended in 1997 for abundance based management of the commercial charter fleet on historic catch records. I believe that either this recommendation, or the charter fleet having to buy IFQ poundage like everyone else would be a more acceptable alternative to the "fixed poundage" give away.

Sincerely,

  
William J. Harrington

RECEIVED

AUG 27 1999

N.P.F.M.C

Mr. Richard Lauber, Chairman  
North Pacific Fishery Mgt. Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Dear Mr. Lauber:

I purchased an Alaskan Sportfishing license and fished for halibut out of Homer, Alaska. It was a great experience and the expenditures I made to pursue this PUBLIC resource contributed substantially to local and state economies, especially given the small amount of resource taken, i.e. 2 fish. I sportfish not only for fun, but also for food for my family.

As a stakeholder and user of this PUBLIC fishery resource, I am concerned about the guideline harvest level (cap) proposals being considered for the guided sportfishery by the North Pacific Fishery Management Council. The commercial halibut fleet pursuing this restriction takes over 60 million pounds annually while the guided sport fishery subject to this potential restriction takes only 3-4 million pounds. Further, 13 million pounds of halibut are wasted annually as commercial bycatch.

Given the strength of the halibut resource and the small sport harvest, I am opposed to any proposals which would restrict the guided sport harvest of halibut at this time. These restrictive proposals are based on economic allocation, which is in conflict with the Magnuson/Stevens Act.

I ask for your assistance in insuring that recreational angler access to this strong PUBLIC resource is not restricted only to provide a few more halibut for commercial harvest.

We have been coming to Alaska for the last 10 years for the fabulous fishing, both halibut and salmon, and would hate to see more restrictive regulations geared towards the sports fisherman. We spend a significant amount of money on van rental, hotels and other lodging, food, fishing gear, and souvenirs besides the guided halibut charters.

Respectfully,

Dale Peterson

1457 Irish Rd

Neenah, WI 54956



Richard E. Griffin  
50 Meetinghouse Road  
Bedford, NH 03110-5551

RECEIVED

AUG 27 1999

N.P.F.M.C

August 23, 1999

Mr. Richard Lauber, Chairman  
North Pacific Fishery Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Dear Mr. Lauber:

During August, I purchased four Alaska Sportfishing licenses for my family and me in order to fish for halibut out of Angoon, Alaska. It was a great experience! My expenditures to pursue this PUBLIC resource exceeded \$20,000 and contributed substantially to the local and state economies, especially considering the small amount of fish taken. And, while I sportfish for fun, I consume all of the fish I take.

As a stakeholder and user of this PUBLIC resource, I am concerned about the guideline harvest level (cap) proposals being considered for the guided sport fishery by the North Pacific Fishery Management Council. The commercial halibut fleet pursuing this restriction takes over 60 million pounds of halibut annually and wastes another 13 million pounds as commercial bycatch. The guided sport fishery subject to these proposals takes less than four million pounds annually, less than one-third of what the commercial fishers waste!

Given the strength of the halibut resource and near insignificance of the guided sport harvest, I am opposed to any proposals which would further restrict the guided sport harvest of halibut. In addition, basing these restrictive proposals on economic allocation, appears to be in conflict with the Magnuson/Stevens Act.

I urge you to insure that recreational angler access to this strong Public resource is not restricted any further, especially in order to provide a few more halibut for the commercial harvest.

Very truly yours,

  
Richard E. Griffin

David S and Jitka Olander  
7114 Kingsbury  
University City, Missouri 63130-4306  
phone: 314-863-7015 email: daveyo@stlnet.com fax 209-882-6254

---

August 23, 1999

Mr. Richard Lauber, Chairman  
North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

RECEIVED  
AUG 27 1999  
N.P.F.M.C.

Dear Mr. Lauber:

Earlier this month, during a vacation in Seward, I fished for halibut after obtaining an Alaska Sportfishing license. This was a fairly expensive visit, which brought tourist money to the area.

I was surprised and discouraged to learn about the guideline harvest level (cap) proposals being considered for the guided sportfishery by the North Pacific Fishery Management Council. The commercial catch of halibut is over 60,000,000 pounds – about twenty times the recreational catch. The most appalling part is the wastefulness of commercial fishing – destroying a great many fish as bycatch, 13,000,000 of which pounds are halibut.

The proposals place an undue burden on sportfishing while leaving commercial fishing open to continue fishing methods highly destructive of ocean fauna.

I hope you will address the existing inequity, which would only be furthered by the proposed sportfishing restriction.

Sincerely yours,



David S. Olander

# BREDESEN COMPANY

Real Estate Planning & Marketing

## Facsimile Transmission Cover Sheet

**RECEIVED**  
SEP 23 1999  
N.P.F.M.C

\*\*\*\*\*

DATE: 9/24/99 TIME: \_\_\_\_\_

TO: Commission Members

FAX NO.: 271-2877

FROM: William/P. Bredesen

RE: Habit Order for Sports Fisherman

Number of Pages Sent: \_\_\_\_ . If you did not receive all pages, please call this office at 907-563-6999 and we will retransmit the documents.

\*\*\*\*\*

MESSAGE:

Habit fishing (sports) is very important to Alaska's tourism industry. As you address the public on the issue, please remember how many non-commercial business and families depend on it.

This is a major decision - Sports Fishermen have had a small voice in the past - please change this just.

Land  
Commercial Development

*Bill Bredesen*

RECEIVED

SEP 29 1999

N.P.F.M.C

North Pacific Fishery Management Council  
605 W 4<sup>th</sup> #306  
Anchorage, AK 99501-2252

Mr. Richard Lauber-Chairman

Dear Mr. Lauber,

In regards to quotas for sport caught halibut, I would like to voice my opinion. I own a small riverboat that I use in saltwater with caution in regards to weather conditions, my family and I catch a few halibut. Since I retired from my occupation I have more and more family from the lower 48 states visit me. Most all enjoy going on halibut fishing trips. We charter with halibut fishing guides to enhance our chances of catching halibut for my family to take home. To initiate a quota of only one halibut per person on a charter boat seems grossly unfair to a person using halibut charter boats. The commercial fleet should be better monitored to avoid waste of halibut [referring to cod fisherman not keeping halibut and other species, referred to as bycatch]. Please consider my input as a vote to retain a two halibut per person limit while fishing from a halibut charter boat.

The great state of Alaska continues to advertise the great fishing adventures to be had in Alaska, why would the halibut commission be considering otherwise? I intend to forward a copy of this request to Governor Tony Knowles.

Thank you for your consideration.

Sincerely,

*Larry G. Graham*



GHV

Oct 4, 1999

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

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

Dear Chairman Lauber,

I am writing concerning the halibut allocation issue to guided sport operations. I have commercial skiff fished for halibut over twenty years out of Sitka. I feel resource management should be abundance based rather than affixing a set amount for the economic convenience of a new industry. I applaud the councils past record of conservative management. I hope you will do what is fair and maintain the halibut resource for future generations.

Sincerely,  
Terry Perensonich  
Terry Perensonich



Terry Perensonich  
SITKA SHIPWRIGHTS COOPERATIVE, LTD.  
1404A Sawmill Creek Road  
Sitka, Alaska 99835

Mr Lauber,

9/25/99

I would like to respond to the response I recieved from the State to my letter on the halibut charter issue.

The letter from the State indicates that the charter fleet is NOT AS ADAPTABLE AS the longline fleet. I believe the charter fleet could adapt in many ways. Hook and release is possible, A lower bag limit is possible, fishing for other species is possible for NON residents which account for over 90% of charter boat clients in Southeast.

In my opinion A great way for a charter operator to adapt would be to include some type of ecotourism in their seasons such as whale watching, bird and wildlife viewing or tours that just enjoy our great state. Does every visitor have to pack away boxes full of our resources?

Local subsistence users have adapted since the arrival of the charter fleet. Many go to the grocery store for "subsistence" now because they can't catch a fish ~~boat~~ near town any more. Perhaps you have noticed this in the JUNEAU AREA?

I know the charter fleet doesn't want to adapt, but this is hard for a commercial fisherman to swallow. I have longlined for halibut for 22 years and have had to adapt in some way ~~for~~ almost every year. The longline fleet has gone from almost unlimited fishing in the 70's to fishing 1 or 2 days a year when I.F.Q.'s were implemented. When I.F.Q.'s were implemented some longliners lost the opportunity.

RECEIVED

SEP 29 1999

N.P.F.M.C

to fish. All together. Many invested heavily in I.F.Q.S so they could stay in the game. I would say the longline fleet has adapted it is now time for the charter fleet to adapt.

I would also like to point out that during the years of debate over how to manage the halibut fishery at the Council level the charter fleet was nowhere in sight.

I think the Halibut Charter fleet can begin to adapt by adopting a guideline harvest level of 125% of the 1995 charter fleet catch as adopted by the N.P.F.M.C. based on a percentage of the overall gata NOT a fixed amount. There are many ways the charter fleet can live within this GHK. Hook + release, targeting other species, Alow bag limit. And promoting eco-friendly tours such as bird + whale watching are a few.

I think we can all work together on this issue including longliners, charter operators, local subsistence users and Non resident sports.

But we cant all have it all, those days were gone 20 yrs ago. Long before the charter fleet arrived on the scene. It is now time for the charter fleet to adapt and they CAN!

Thanks

Dick Curran  
Dick Curran  
Box 1336

5111 111 901

To: North Pacific Fishery Management Council @ 271-2817

From: Doug Hanshaw

Date: October 9, 1999

re: Halibut fishing

Dear Council:

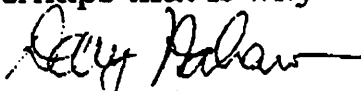
I am concerned and outraged about the longliners' proposal to further limit my sport-caught take of Alaskan halibut. Their contention that this won't affect me and other Alaskans is nonsense. Fishing is one of the big pleasures in my life and I always harvest only what I need to feed my family.

I have been on four halibut charters in the past four years, and the percentage of Alaskan clients on the boats has varied between 16% and 40%. Many of the non-Alaskan clients were guests of the Alaskans. On four trips I harvested seven fish of excellent quality and met many fine people.

As to their argument that people like myself and the captains I fish with are eroding the value of their IFQs, I believe they were given those quotas without paying for them. Why should they be guaranteed a fixed price on their free fishing rights to make money at the expense of my ability to feed my family in a healthy, efficient way? It is much safer and more desirable for me to pay a professional captain \$125 once a year than to purchase a boat which would require monthly payments, maintenance, insurance, and mooring fees in the thousands of dollars every year just for 100 or 200 (including salmon) pounds of fish.

If the only way to take our legal two fish per day was in our own boats many people would do so. Would these commercial fishermen, many of whom do not even live here, really want hundreds more amateur boaters and the pollution they would unavoidably make sharing the same waters with them? They would find themselves morally and legally liable to participate in a lot more rescues of inexperienced boaters. Please tell them it would be hard to fill their IFQs and their wallets if they are busy fishing landlubbers out of the ocean.

The current sport charter fishery system is a safe, enjoyable, efficient way for Alaskans and others to feed themselves and their families. Perhaps that is why the longliners are against it.



Doug Hanshaw  
441 Falke Ct.  
Anchorage, AK 99504

(907) 333-6815

RECEIVED

NOV - 4 1999

Dear Honorable Rick Lauber,

10/24/1999

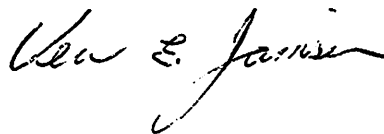
I am writing in opposition to a proposal by the <sup>NPFMC</sup> North Pacific Fisheries Management Council and ADFG that would provide a fixed poundage allocation to the halibut charter fleet.

I presently own 2,300 pounds of halibut IFQ's that were hard earned through the quota share system. I recently received word that my IFQ loan I applied for through the NMFS had been approved. I'm concerned whether my IFQ's will be worth what I borrowed on them in a few years and what my poundage might be shaven down to in years to come, if the halibut charter fleet continues to go unchecked. They need to be placed under an abundance based management system. They should become responsible stewards of the resource just as we have with the inception of the IFQ's system. Let the the charter fleet become part of the quota share program. The North Pacific Fisheries Management Council should not consider a fixed poundage allocation. By removing the halibut charter harvest from abundance based management is poor decision making and will have an adverse impact not only on the commercial halibut fishery, but also the non guided sport fisherman chasing halibut in lower Cook Inlet in their own boats. It's time the halibut charter fleet become part of the IFQ system, the only system that works. The halibut their clients pull from the ocean floor is dollars in their pockets. They are making a living from these fish and the charter fleet should adhere to the same system that governs our fishery. A fixed poundage allocation is discriminating against every IFQ holder, non guided sport fisherman and subsistence user ! With abundance based management the charter fleet will join us in protecting the resource.

Thank you for taking time out from your busy schedule to read my concerns in this letter.

Sincerely,

Vern E. Jamison



Vern E. Jamison  
1527 West 57th St  
McMinnville, OR 97128

Mark Worley  
F/V Golden Chalice  
6320 Rosedale St. N.W.  
Gig Harbor, WA 98335

RECEIVED  
NOV - 5 1999  
N.P.F.M.C

November 2, 1999

RE: Commercial Fishing

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

Dear Chairman Lauber,

I am the captain of a Commercial Longline vessel, participating mainly in the IFQ fishery for Blackcod and Halibut. The Halibut Charter Fleet is asking for a special "Fixed Poundage" allocation, which I strongly oppose. As a fisherman, I understand the need for abundance-based management, and feel it is unadvisable to abandon it.

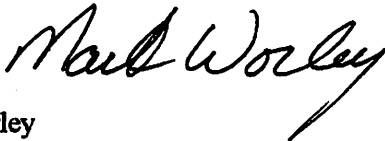
The abundance of Halibut is the very reason for the explosion of Halibut Charter operations. Without abundance, the fishing will be unproductive and tourism will drop off, whether they have 10% of the quota share pool or 100%. In years of low abundance the CEY (catch effort yield) will increase and tourists can expect to pay more and catch less. The attraction of being guaranteed a fish when taking a Halibut Charter will be gone. Because, as an avid sports fisherman I think, the attraction is surely not the sport of a fighting fish. The attraction is filling your freezer with Alaskan Halibut.

Making the point that no matter how much fish the Charter sector is given, it will not give them stability in fishing!

What giving the Halibut Charter Fleet a special "fixed allocation", will do, is undermine the credibility of fish management, and degrade the value of the new IFQ system.

I thank you for your consideration of my letter.

Sincerely,



Mark Worley  
Fairweather Fish, Inc.  
Captain/ F/V Golden Chalice

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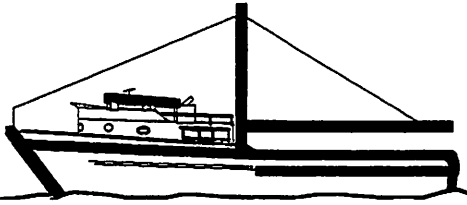
NOV - 8 1999

1-6-99  
3316 NW Golden Pl  
Seattle, WA 98117

Mr. ~~Jack~~ <sup>N. P. M. G.</sup> Lauer Chairman  
North Pacific Fisheries Council  
605 W. 4th Ave Suite 306  
Anchorage, AK 99501-7252  
Dear Chairman Lauer:

I am writing to oppose  
any actions by the ADFG and your  
council that raise the quota and provide  
a fixed percentage allocation to the  
Halibut Charter fleet.  
We have an agreed percentage  
in effect now that was based on their  
past participation.  
We, Pacific Ocean Fisheries,  
have bought and indebted ourselves for  
a very large amount of money. If this  
based on the present rules, to change the  
rules now could create real problems in  
the future.

Yours sincerely  
Jack Crowley



## *F/V Cape Flattery*

Steve Jangaard  
Owner/Operator

November 5, 1999

Dear Honorable Rick Lauber,

On behalf of my myself, my family and many other families that share the same views I do on this matter, I am writing to oppose the actions by Alaska Department of Fish and Game and the North Pacific Management Council that would raise the quota and provide a fixed poundage allocation to the halibut charter fleet.

As a child, my family raised me, my two brothers and sister almost entirely from fishing income from the halibut fishery. With the increased participation of both the commercial and especially the charter fleet, I am supporting my family of four with about one-half my income coming from the halibut fishery. This has been very difficult and continued operation of my vessel (which has been in my family since 1941) has become marginal at best. If any new proposals go through that reduce my quota share I fear I will be forced to let this piece of family history go.

This year I went out on a charter boat with my son, It cost us \$150 each. With six persons on board, that's \$900/boat twice a day. If a boat only works the summer months it will gross over \$80,000 with much less initial and on going expense than I have. Also, I am pretty sure the skipper at age 19 (no crew) was not supporting a family.

Through regulations, IFQ's and fish taxes, since I began running my boat in 1985, we have been experiencing less and less percentage in catch of the quota. This is not a time to implement raises and fixed allocation for the charter fleet at the expense of the commercial fleet again.

Thank You.

Sincerely,

  
Steve Jangaard

RECEIVED

NOV - 8 1999

N.P.F.M.C



RECEIVED

NOV - 8 1999

October 27, 1999

N.P.F.M.C

Dear Mr Lauber,

This is a letter of concern about the sport halibut fishery and opposition to the ADFG's proposal to give them a fixed quota.

I have been a commercial fisherman in Alaska for 20+ years, I saved my money and started investing in halibut quota shares in 1995 after the implementation of IFQ's. I was originally allotted around 5000 lbs. of quota shares, which was not enough to make a living with, but a start.

Because the salmon and herring fisheries I am involved in were not enough income, I invested and reinvested in halibut q.s. To give the charter industry a fixed amount of halibut would restrict my ability to pay back the loans on my quota share. I and my family, and crew members and their families depend on halibut for a living. And the local shore based services depend on the commercial halibut fishery.

As commercial fishermen we realize that for continued growth and sustainability of the resource we HAVE to adjust to changes in the allowable catch, everybody should have to adjust to fluctuations in the quota, not just one user group. The yearly quotas come out early enough in the year for the charter industry to adjust for the seasons' harvest.

The sportfish division at ADFG should stick with management and not be involved with allocation issues.

I would like to please ask you as a member of the council, to ask the council to drop the analysis of the fixed poundage option, since this option runs counter to long standing Alaska management principles as well as those of the IPHC, that have proven to work just fine. In fact despite what some outside groups might claim, Alaskas' fishery management is the best in the world.

In closing I would agree to 125% of the 1995 sport charter harvest that the charter groups had agreed to previously.

Sincerely,

*George Kirk*

George Kirk  
P.O. Bx. 2796  
Kodiak, Ak. 99615  
(907) 486-5433

Honorable Rick Lauber  
Chairman, NPFMC  
605 West 4<sup>th</sup> Ave., Ste. 306  
Anchorage, AK 99501-2252

RECEIVED

NOV 10 1999

N.P.F.M.C

Dear Chairman Lauber:

I am the owner of the fishing vessel Mar Del Norte that I have fished out Kodiak since March 1976. I am writing to oppose actions by the ADFG and North Pacific Fisheries Management Council that would provide a fixed poundage allocation to the Halibut charter fleet.

My business depends heavily on the commercial halibut fishery. During 1999 our Halibut fishery accounted for 23 % of our annual gross income. This fishery is also very important to the coastal communities. Cannery workers, grocers, fishing gear suppliers, all benefit from a healthy commercial Halibut fishery.

I have fished Halibut since the early 80s and take pride in knowing that the resource is healthy. I understand the need for abundance based fishery management and have lived with this system for years even though it hasn't always been easy. I feel that to give the charter fishery a fixed allocation of the Halibut resource would be a very bad policy decision.

It is not the position of the ADFG Sport Fish Division to become involved in issues that concern the allocation of the halibut resource between user groups. The Sports Fish Division should stay with management and stay out of allocative issues.

I request that you ask the North Pacific Fisheries Council to drop their consideration of a "fixed poundage allocation" for the charter fishery.

Sincerely,



Robert L. Krueger  
Owner, F/V Mar Del Norte  
Kodiak, AK

2113 8<sup>th</sup> St. NE  
East Wenatchee, WA 98802  
509-884-8318

cc:

Governor Tony Knowles  
Mr. Joe Kyle  
Mr. David Benton

Nov 8, 99

Dear Honorable Rick Lauber,

I am writing on behalf of my husband and me to oppose actions by the ADFG and the North Pacific Management Council that would provide a fixed poundage allocation to the halibut charter fleet.

My family and I depend on the commercial halibut fishery for 80% of our annual income. The other 20% is from the blackcod fishery. The halibut fishery provides sustainable jobs in our community and benefits many businesses and support businesses in our community and surrounding bush communities. Commercial halibut dollars flow through almost every business in these small bush communities in southeast, AK. We have invested heavily in IFQ because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and our boat. It will also impair the ability of people such as myself to repay boat and IFQ loans.

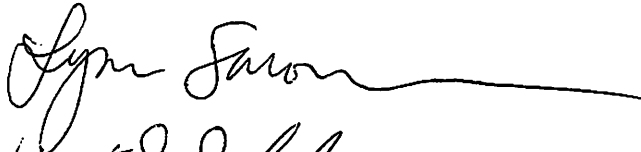
All those who rely on a sustainable resource for a living understand the need for abundance-based fishery management and accept the risks involved with fluctuation in harvest. Commercial fishermen have been responsible stewards of the halibut and have fished under rules adopted by the International Pacific halibut Commission since 1923. Delinking the halibut charter harvest from abundance-based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the state's credibility. Abundance-based management has been a corner stone of a successful management program and it is not wise to abandon it.

Recent allocation advocacy by ADFG Sport Fish Division is contrary to state policy. The sport Fish Division should stick to its job of management and leave allocation to the proper organizations.

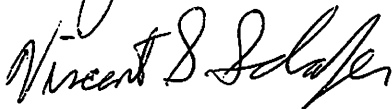
Please ask the North Pacific Fishery Management Council to immediately drop considerations of the "fixed poundage allocation" since this option runs counter to fundamental management philosophy. The charter allocation should be set at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many ways.

Sincerely,



Lynn Savonen



Vince Schaffer

RECEIVED

NOV 15 1999

N.P.F.M.C

PO Box 172

GUSTAVUS

Dave H. Beam  
P.O. Box 297  
Girdwood, AK 99587

November 12, 1999

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

RECEIVED  
NOV 15 1999  
N.P.F.M.C.

Dear Mr. Lauber,

I am writing to oppose actions by the Alaska Dept. of Fish & Game and the North Pacific Fishery Management Council that would provide a fixed poundage allocation for the halibut charter fleet.

I have been a commercial fisherman in the state of Alaska for the last twenty years. As a Limited Entry Permit holder, my work for most of that time has been focused on salmon. Two years ago I invested in the I.F.Q. halibut fishery, Area 3A, after having considered buying into the program since its inception in 1995. I felt the abundance based management system was working very well and that I.F.Q.'s would be a fairly safe investment and a good way to supplement my lagging salmon income. With the possibility of the charter fleet getting a fixed poundage allocation, not based on the actual numbers of halibut in Area 3A, I am seriously doubting this decision.

To purchase my I.F.Q.'s I secured a twelve year loan through the Alaska Commercial Fishing and Agriculture Bank. The money I earn from my I.F.Q. pounds pays my loan with very little left over. A reduction in my I.F.Q. quota because of a fixed poundage allocation being given to the charter boat fleet would make it very difficult for me to repay my I.F.Q. loan.

I am perfectly willing to lose quota if the resource dictates, but please do not abandon abundance based management system that has worked so well since 1923.

I also feel very strongly about ADF&G Sport Fish Division being involved with allocation. I think they should stick to management, where they are doing an excellent job.

Thank you for considering my comments.

Sincerely,

*Dave H. Beam*

Jeff Villarma  
4065 SE Conifer Park Drive  
Port Orchard, WA 98366

Dear Honorable Rick Lauber,

I would like to express my concerns and opposition regarding the guided sport fish halibut allocation . I don't believe that the ADF&G & the NPFMC are looking out for the best interests of the resource when proposing a fixed allocation.

I was born and raised in S.E Alaska and my family has come to rely on income generated from my halibut IFQ. I have recently paid my IFQ loan off after several years of working them for no current income. Now my efforts are once again threatened by the COMMERCIAL guided halibut charters. When a business is profiting from harvesting a particular resource, it is a commercial business. Just look at the charter resorts or waterfront compounds they use as hotels and processing plants for their wealthy clients. I being a commercial fisherman could never afford such a prime facility! The charter fleet has fooled you by masking as a sport group.

Our current halibut fishery generates many jobs in every community of Alaska from fish plant workers , fuel docks, hardware & supply stores to grocery store employees. The list goes on. The IFQ system has been a successful tool in managing the halibut fishery and any drastic allocation changes will affect far more people than just the commercial fisherman.

When considering the allocation , please stick with an abundance based policy and disregard any fixed poundage system. It is only smart resource management.

The charter allocation should be set using their 1995 harvest and not the following years when the growth and effort was unreasonably obvious. We are all willing to adjust to sustain a viable fishery and protect our future halibut stocks. Please don't take from one groups livelihood and give to another without realizing the full impact.

Thank you for listening to our views and I hope you will consider them in your decisions.

Sincerely,

Jeff Villarma  
Commercial Fisherman

WAYNE A. DAVENPORT, M.D.

November 3, 1999

Governor Tony Knowles  
State of Alaska  
PO Box 110001  
Juneau, AK 99811-0001

RECEIVED  
NOV 15 1999  
N.P.F.M.C

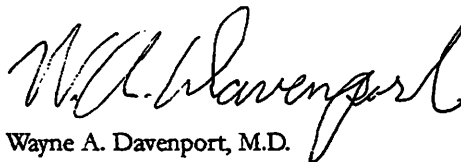
Dear Governor Knowles:

I believe that the ADF&G proposal for a fixed halibut allocation for the charter fleet is unfair and counter to good fundamental management policy. The charter fleet should be flexible enough to handle the fluctuations in halibut quota.

I have been fishing in Alaska since 1977, and 75% of my family income comes from fishing. In addition, commercial fishing and halibut dollars support many businesses in Alaska. Management of halibut quotas in such a detrimental way, catering to the sport fishing interests, will decrease my family income and that of other commercial fishermen.

Please consider this request: Do not allow management of halibut sport quota on a fixed-percent allocation.

Sincerely,



Wayne A. Davenport, M.D.

cc: Honorable Rick Lauber, Chair, NPFMC, Mr. David Benton, Halibut Coalition

Phone 206-783-7904

November 11, 1999

Honorable Rick Lauber  
Chairman NPFMC  
605 West 4th Ave, Ste 306  
Anchorage AK 99501-2252

RECEIVED

NOV 15 1999

N.P.F.M.C.

Dear Mr. Lauber,

I am writing to oppose actions by ADFG and the North Pacific Fishery Management Council that would provide a fixed poundage allocation to the halibut charter fleet.

My family and I depend on the commercial halibut fishery for 90% of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through many businesses. I have invested heavily in IFQ because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and my boat. It will make it hard for me and many others to repay both boat and IFQ loans.

All those who rely on the sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Delinking the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the state's credibility. Abundance based management has been a cornerstone of a successful management program and it is not wise to abandon it.

Recent allocation advocacy by ADFG Sports Fish Division is contrary to state policy. The Sports Fish Division should stick to its job of management and leave allocation to the proper organizations.

Please ask the North Pacific Fishery Management Council to immediately drop consideration of the "fixed poundage allocation" since this option runs counter to fundamental management philosophy.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our communities and benefits the state in many positive ways.

Sincerely,

Randall C. Shear

Dear Honorable Rick Lauber,

I am writing to oppose actions by ADF&G and the north Pacific Fishery Management Council that would provide a fixed poundage allocation the halibut charter fleet.

My family and I depend on the commercial halibut fishery for 60% of our annual income.

I am 54 years old and have been in the fisheries most of my life. With retirement just around the corner I will be depending on my halibut income for 90% or more of my yearly earnings. Many times in the past my life was put on the line during the qualifying years for halibut IFQ'S. How can ADF&G and the NPFMC give our years of life threatening halibut poundages to a new group, "The Charter Operators?"

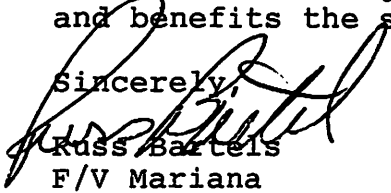
The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, Repair shops airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and my boat. It will also impair the ability of people to repay both boat and IFQ loans.

All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific halibut Commission since 1923. Delinking the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation and undermines the State's credibility. Abundance based management has been a corner stone of a successful management program and it is not wise to abandon it.

I ask you to please ask NPFMC to stop the consideration of "fixed poundage allocation" since this idea runs counter for fundamental management philosophy. The charter allocation should be set at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

  
Russ Bartels  
F/V Mariana  
8044 Davidson Ave.  
Edna Bay, Ak. 99950

RECEIVED

NOV 17 1999

N.P.F.M.C



November 17, 1999

RECEIVED

NOV 18 1999

N.P.F.M.C

Chairman Richard Lauber  
North Pacific Fishery Management Council  
605 W. 4th Ave.  
Suite #306  
Anchorage, Alaska 99501-2252

Dear Chairman Lauber,

I am writing to you as a longtime Homer resident and small-boat commercial fisherman. I am totally opposed to the halibut sport-charter industry getting a fixed poundage allocation. Let them figure out a solution within the existing 1997 agreement. The charter industry has had several years to prepare a solution to the problem many have seen coming. Their three point solution? Stall, take from someone else, don't share in conservation.

Meanwhile, I have mortgaged most all I own to buy into a program the Council and State promoted. The IFQ program cut commercial longline numbers by almost half. Nobody got to catch what they were accustomed to. To be viable we had to buy in or get out. Fine, we accepted these painful and costly transitions. The charter business needs to make some tough decisions now also. I hope both yourself and the other Council members remember these points as you try to resolve the charter's problem.

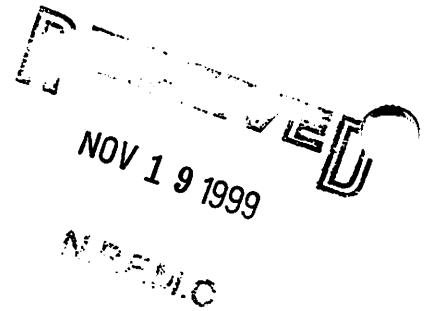
Thank you,

*David Whitmire*

David Whitmire  
P.O. Box 2481  
Homer, Alaska 99603  
907-235-7670

Tuesday, November 16, 1999

Honorable Rick Lauber  
Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> AVE. ste306  
Anchorage , Alaska 99501-2252



Dear Chairman Lauber,

I am writing to you in regards to the halibut IFQ fishery and the proposed allocation plan the charter fleet has submitted to the NPFMC . It seems they want to have a special , fixed number of pounds to catch each year that is not related to the total allowable limit caught as determined by the IPHC.

They want a fixed rate that will not change with the natural variables of the resource. This sounds very short sighted and a very unfair approach to managing the stocks. It seems the charter fishing fleet has become a very big business in the state of Alaska and are now , at every turn , trying to take away my right as a commercial fisherman to make a living.

I have been fishing since 1977 and have paid my dues as both a crewman and a skipper for the fishing business that I have today. When IFQ's came into be the way of managing the resource I didn't complain or fuss about it even though I didn't get any original pounds allocated to me. I chose to work with the system that was put in place by the powers to be and have taken my share of risk, both financial and physical and now am able to make a decent living with this shaky industry we have here.

By no means am I getting rich from this and I have been making my banker very happy these past 5 years since the ifq program started. If the charter business keeps expanding at my expense and others in my same position I will forced to find another profession.

It's always the same in life. When somebody discovers a good thing and takes the necessary risks to make it work there are always the ones that will come into the picture after the fact and try and get in for the pay off without doing the dirty work. I know life isn't fair and you can't count on anything or anyone these days but it would be nice to know that when you make a business decision and take a financial risk based on rules and laws newly established , that you can count on those same rules and laws not changing in such a short time. In this case the playing field is the same but the numbers of players are being increased to where it is threatening my livelihood.

I would hope that you would urge the NPFMC to not allow this charter fleet business to take the bite out of the halibut resource that they would like. Thank you for your time in reading this letter and have a happy holiday season.

George R. Veneroso  
F/V Diamond V.

Geo. R. VENEROSO  
PO- box 1164  
Sitka, AK 99835

Eric V. Parker  
P.O. Box 1424  
Sitka, AK. 99835  
(907) 747-5564

RECEIVED

NOV 19 1999

N.P.F.M.C.

Nov. 6, 1999

To whom it may concern:

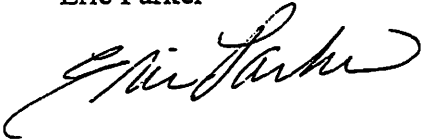
I am writing to oppose actions by ADFG and the North Pacific Fishery Management Council that would provide a fixed poundage allocation to the halibut charter fleet.

I have fished as a crew member for more than a decade during the years before the IFQ program was implemented. I have earned the right to purchase IFQ and to participate in the commercial halibut industry; an industry which the state and federal government promised would be stable with the implementation of the IFQ program. Now I feel betrayed by the government who now undermines a long established commercial halibut industry by not regulating and restricting more the charter access and catches.

The government is destabilizing the commercial fishing industry by it's lack of protection for it. Please ask NPFMC to immediately drop consideration of the "Fixed poundage allocation" to the charter fleet. Your consideration of this letter is appreciated.

Sincerely,

Eric Parker



November 15, 1999

RECEIVED

NOV 19 1999

N.P.F.M.C

North Pacific Fishery Management Council  
Richard Lauber, Chair  
605 W. 4<sup>th</sup> #306  
Anchorage, Alaska 99501-2252

Dear Council Member:

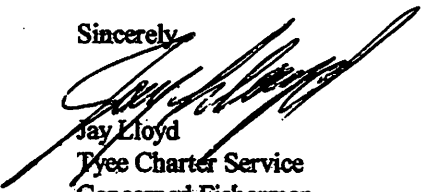
I am concerned that the North Pacific Fishery Management Council lacks any representation in voting seats from the sport fishery or sport fish industry. This results in management decisions being made by a group of commercial fishing representatives (sitting on the NPFMC) who compete for the same fish. Further, the NPFMC is the only council in the U.S. that does not have any representation from sport or guided sportfishing interests.

The commercial harvest of halibut has increased as the halibut abundance has increased over the years and the sportfish bag limit has not increased. The sport halibut bag limit for both guided and non-guided anglers, should remain two fish per day of any size per person. I am not opposed to a lower bag limit during times of critically low abundance, however.

In consideration of the alternatives, only alternative 1 "no action" should be supported at this time. The other proposed alternatives if adopted would have a significant impact on public use of this strong public resource. Any alternative that is not abundance based, such as alternative 3, would be ominous to the sport fishery and should not be supported at anytime. None of the proposed alternatives make much sense at this point when the bycatch and the amount of wasted fish in other commercial fisheries far outweigh the proposed harvest levels for Alaska's guided halibut sport fishery. Alternative 1 "no action" should be supported at this time.

Sportfishermen would look forward to developing a comprehensive management plan for all of Alaska's halibut fisheries (including sport and guided sport) in a forum which had representation from guided and non-guided sportfishing interests. Each component of Alaska's halibut users should be considered as a part of the overall gulf-wide utilization of halibut. The current NPFMC exercise, which is being promoted by commercial halibut fisherman would only provide a few more halibut for commercial use at the cost of public access to this strong public resource. The Pacific Fisheries Management Council just crushed the ground fish fishery in California for all users. We can do better than that in Alaska if we all work together.

Sincerely,



Jay Lloyd  
Tyee Charter Service  
Concerned Fisherman  
Juneau, Alaska

RECEIVED  
NOV 19 1999  
NPFMC

Dear Chairman Lauber;

I am concerned that the NPFMC is looking at a fixed poundage allocation for the charter fleet rather than sticking to guideline harvest level that was hammered out in 1997.

I am a halibut longline fisherman from Petersburg. When the IFQ program was implemented I sat down with the three crewmembers on my boat and told them that if we wanted to successfully make a living in the longline fishery we needed to purchase more quota. We have done that knowing that we had good conservative management and believing that any allocation splits would be done fairly, based on historical use. Giving the halibut charter industry a fixed number allocation as proposed by fish and game sportfish division (125% of the 1998 charter catch) would not be right. Both the longline and the charter industries should have a percentage share of the resource that goes up when there is a lot of fish, and goes down when there are not a lot of fish. Regarding the proposed use of 1998 numbers rather than the GHF established in 1997, that would be grossly unfair. This would be like making a deal to cap a growing fishery and then a few years later, after failing to work out the details to stay within the deal, coming back to ask for more fish.

Halibut is one of three major fisheries for me. Also ~~it is~~ it is my understanding that many people from Petersburg have invested in halibut IFQ, thus Halibut is important for our community.


The council should stay the course that they decided on in 1997. The agreement to use 125% of 1995 catch was more than fair. Do not get lured into a new deal of fixed allocation.

This is just another way that the charter industry is refusing to take real steps to resolve the problem.

Thank you

Bryon Pfundt

**BRYON PFUNDT**  
F/V KIMBER  
BOX 1162  
PETERSBURG, ALASKA 99833

 Allen Engebretsen  
Box 534  
Homer, Alaska 99603

November 23, 1999

Chairman Richard Lauber  
North Pacific Fishery Management Council  
605 W. 4th Ave.  
Suite #306  
Anchorage, AK 99501-2252

Dear Chairman Lauber,

I am writing to you as an Alaskan resident and commercial fisherman. I am totally opposed to the halibut sport-charter industry getting a fixed poundage allocation. Let them figure out a solution within the existing 1997 agreement. If the charter fleet feels this allocation is insufficient, let them buy quota as the vast majority of the commercial fleet has done.

Both charter and commercial users access a public resource for economic gain. Both user groups serve the public. Many forget "the public" is not only subsistence, sport, and those aboard a charter, but also includes those people patronizing restaurants and grocery stores the commercial fleet supplies. The charter industry has had several years to prepare a solution to the problem many have seen coming. Their three point solution? 1) Stall 2) Take from someone else 3) Don't share in conservation.

Meanwhile, the commercial fleet has bought into a program the Council approved and the State has promoted. Contrary to popular belief, most of us were not made wealthy by a large windfall, but have mortgaged homes, boats, and property to buy into the IFQ program. The IFQ program cut commercial longline numbers by almost half. Initially, nobody got to catch what they were accustomed to catching. To be viable we had to buy in or get out. Fine, those of us that remain have accepted these painful and costly transitions. The charter business needs to make some tough decisions now also. I hope both yourself and the other Council members remember these points as you try to resolve the charters' problem.

Thank you,



Friday, September 17, 1999  
F/V Sierra Mar  
C/O Wards Cove  
Ketchikan, AK

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

Dear, *Rick Lauber*

I am an Alaskan longliner who bought back into Area 2-C and 3-A Halibut IFQ fishery after being eliminated from it 1995. I have been crewing since 1972. The shares I now own; the investment I have made; and my boat and career were bought in good faith – fair and square – with hard work, personal sacrifice and after-tax dollars.

I can't tell you the level of distress I am feeling to think the ADFG is sponsoring an option to grant the Guided Charter Industry a fixed allocation of the halibut resource. What is the Guided Charter Industry if not just another form of commercial fishing? The ADFG should not be in the allocation business or an advocate for any particular group. **Their business and mandate is biology and management.**

The only fair system is to limit the Guided Charter Industry to the 1995 levels of their catch. If an individual wants to harvest more halibut, they can buy quota on the open market – just like everybody else who lost their jobs and investment back in 1995. This market system is in place so they can buy back in.

To take quota from myself, and the many others like me, and give it to another type of commercial fishing personnel who have little to no fishing industry to serve an industry with a 96% out-of-state client base is morally, ethically and politically WRONG.

Please consider the points I have made and this situation carefully. Our great country depends on protecting the rights of property and the rights of the individual. Please do the right thing as an American.

Sincerely,

*Kevin Seabeck*

Kevin Seabeck



KEVIN SEABECK  
8555 30TH AVE NW  
SEATTLE WA 98117-3847

RECEIVED  
NOV 23 1999

7721 168 Th. PL. S. W.  
EDMONDS, WA. 98026

N.P.F.M. AUGUSTINE, FISHERIES, INC.

November 24, 1999

NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL  
605 WEST 4<sup>TH</sup> AVE.  
ANCHORAGE, ALASKA 99501-2248

Dear Chairman Lauber,

I have been a North Pacific halibut and black cod longline fisherman for the past 19 years. When these fisheries became IFQ fisheries, I invested heavily in them in order to continue to supply a livelihood for my family.

The request by the commercial charter boat industry for a fixed allocation of halibut is a direct threat to my investment in the fishery. Under their proposal, a drop in the halibut resource would disproportionately effect the value of my investment and my ability to pay for it would be in jeopardy.

Their proposal is blatantly unfair. I do not see that they should have any special rights to the resource. After all they are a commercial enterprise also deriving a living from the same resource and should play by the same rules. It must be remembered that as commercial fisherman we are supplying a service to the American people in delivering fresh halibut to their communities in order that they might enjoy the benefits of this delicious seafood. Not all Americans have the wherewithal to hop in a plane or cruise ship and get to Alaska so they might pay a charter boat operator to take them out and catch a halibut.

In conclusion, I believe the charter boat operators should pay for any increase in their allocation just as I had to. They should also feel the same effect that I do when the quota goes down, their allocation should drop. This is the only fair and equitable way to manage the resource for all participants.

Sincerely,



Paul Clampitt  
Owner, Operator F/V Augustine

[Click here and type slogan]



N.P.F.M.C.  
 Richard Lauber, Chairman  
 605 West 4th Ave. Suite 306  
 Anchorage, Ak. - 99501-2252

P.O. Box 103  
 Ninilchik, Ak. 9963  
 Nov. 22, 1999

RECEIVED  
 NOV 23 1999

N.P.F.M.C.

Re: Halibut GHL

Dear Mr. Lauber and Council Members:

I am a halibut longliner.

This Council must establish the fact that halibut, first, is a subsistence fish and second a commercial species. As such it is protected by the laws of property rights. IFQ's are property that we received in 1995. Commercial and charter ratios were established then and should not be changed without just compensation. When the 1995 cap for the charter industry is reached, the season closes just like it did for commercial fishermen. In the meantime you should develop a program of limiting the number of charter boats or give individual quotas of halibut to charter operators as you have done for commercial fishermen. But First establish the allowable percentage NOW based on 1995 when I got my IFQ's.

If this Council starts down the road of allocation and deviates from what they established as my share of the combined charter and commercial catches in 1995 then the whole process and idea of IFQ's ends right here. What justification will you ever have for establishing a bottom percentage for the commercial IFQ sector if you don't stay with where it was established in 1995.

My experience with the salmon limited entry system, which I've been in since the very beginning, shows me there is no bottom line for losses in the commercial salmon fishery. The current Board of Fish has in its tenure decreased my income by 43%. This same B O F is meeting again this winter on Cook Inlet Salmon for the 6th year in a row to reduce us even more. Halibut has always been a commercial resource like oil or gold. When a mining claim is filed or an oil lease purchased some individual with a gold pan cannot, for recreation, pan gold on that claim. That gold is the property of that claimant. Neither an individual nor the Government can take that away without just compensation to the claimant or lease holder.

Now you have before you a number of alternatives to do just that. Name to take my property away from me. The property that you, The Council, and thus the Federal Government, granted to me in 1995. If you deviate from the percentages that were established in 1995, then what was it I was awarded in 1995? I'll tell you. It was nothing. When I bought more Quota, what was it I bought? Blue sky? The Brooklyn Bridge? Or worthless pieces of paper like my limited entry certificate has become. Don't go down the open-ended allocation road. Stop it here!

Give the charter industry and the sport fishermen the percentages they had in 1995. No more. When I catch my quota I can't fish anymore. What stability do I have when the quota goes down and the price goes down. I certainly can't increase my share of halibut by buying 2 or 3 more boats and putting them in the water as charter businesses have done. A person who buys 2, 3, or more charter boats competes against himself and then he wants a share of my halibut in order to maintain his fleet of charter boats. I say no more than 1995. Thank you,

*Steve Vaneh*



# Glacier Bay

P.O. Box 5 • Gustavus, Alaska 99826  
(907) 697-2288 • (800) 628-0912  
Fax: (907) 697-2289  
email: gbci@thor.he.net  
www.glacierbayalaska.com

RECEIVED  
NOV 23 1999  
N.P.F.M.C.

November 19, 1999

North Pacific Fisheries Management Council  
Richard Lauber, Chair  
605 W. 4<sup>th</sup> #306  
Anchorage, AK 99501 - 2252

Dear Chairman Lauber:

I am writing this letter to voice the concerns of the guided sport fishing industry concerning the consideration of alternatives which would place a harvest guideline level (cap) on Alaska's guided halibut sport fishery.

We as a group are concerned that the North Pacific Fisheries Management Council lacks any representation in voting seats from the sport fishery or sport fish industry. This results in the management decisions being made by a group of commercial fishing representatives who compete for the same fish. The NPFMC is the only fisheries council in the U.S. that does not have representation from sport or guided sport-fishing interests.

The guideline harvest levels proposed for the guided sport fishery range from about 4.7 to 6.2 million pounds. These levels are unrealistically low given that this is a public resource and given that the commercial fishery takes 62 million pounds with commercial bycatch amounts at about 12 to 14 million pounds.

In closing, the Alaska sport fishermen would look forward to developing a comprehensive management plan for all of Alaska's halibut fisheries (including sport and guided sport) in a forum which has representation from guided and non-guided sport fishing interests. In consideration of the alternatives, only Alternative 1, "no action" is appropriate at the December 6, 1999 NPFMC meeting in Anchorage, Alaska.

Thank you and your staff for your attention concerning this matter.

Sincerely,

Kenneth J. Marchbanks  
Co - owner

NOV 19 1999

RECEIVED  
NOV 23 1999  
Dear Richard Lauber -

NPFMC

As an avid fisherman and Sport fishing guide in Southeast Alaska, I am concerned that our halibut resource as influenced by the NPFMC is lacking representation by the Sport fishing industry. Is there space available on the Council for another member or two?

As commercial halibut harvest quotas have gone up recently, I see no reason to attempt capping the Sport fishing limit, Season or bag possession. I support the current 2 halibut per day per person limit statewide. I would also support a length limit of 28" or 32" for a fish to be keepable for Sport fishermen.

I have 10 years guiding experience in Southeast Alaska and hope for another 10 years to come. Halibut is very important to the guided fishery. I hope your Council will respect that in their coming decisions.

Thank you  
Michael Nichols

Michael Nichols  
Box 122  
Pt. Baker, AK  
99927

RECEIVED

NOV 23 1999

N.P.F.M.C

William Flor  
Box 262  
Petersburg, Ak. 99833

Nov. 18, 1999  
Honorable Rick Lauber, Chairman  
North Pacific Management Council

Dear Mr. Lauber:

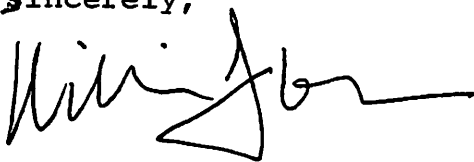
I am writing to comment on the upcoming halibut allocation for the Alaska charter fleet by the North Pacific Management Council.

First, let me tell you ~~you~~ that my family has been directly dependent on commercial halibut fishing for 27 years. Presently it provides 75-80% of our annual income. My two teenage children work with me and are paying their way through college by halibut fishing.

There is plenty of room for the charter fleet but I feel they must adopt the same conservation burdens which the commercial fleet has embraced since 1923. Primary among these is abundance based management. Whatever allocation the charter fleet is finally given it must be based on a percentage of the yearly TAC. I would think that the generous compromise of 125% of the 1995 harvest as already adopted by the council as quite liberal. I would also urge the charter fleet to consider some form of limited access.

I appreciate your consideration of my comments.

Sincerely,



William Flor

November 16, 1999

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NOV 23 1999

N.P.F.M.C

Dear Rick Lauber

I am writing you today in response to the up coming meetings with the North Pacific Fisheries Management Council that will be considering a guideline harvest level for the charter industry. This is a big concern of mine since I am a holder of IFQ's in area 2C. I do not believe they should be cut out of the usage of the halibut resource but should share in the same fashion we do, managed on abundance based instead of a fixed percentage. It seems to me the 125% of the 1995 harvest gives the charter industry room to grow. The only other solution I have is to let the charter industry buy already existing quota that is on the market. Many young fishermen in the industry were faced with this situation in 1995, myself included. Since I have purchased my IFQ's and we rely on the income that it generates. We are prepared to roll with the quota fluctuation but to have another commercial group come in and have know cap makes me uneasy.

Thank you for your time & effort

Sincerely

*Jerome E Dahl Jr.*

Jerome Dahl Jr.

Box 1275

Petersburg Ak. 99833

(907)772-2213

November 18, 1999

**TO: Honorable Rick Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, Alaska 99501 -2252**

**RECEIVED**  
NOV 23 1999  
N.P.F.M.C

**I am writing to express opposition to a fixed poundage allocation for the halibut charter fleet.**

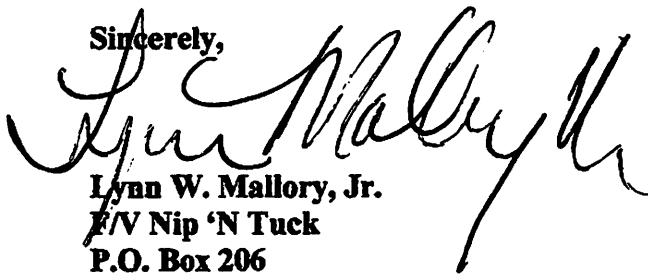
**I live in Cordova, and have participated in the halibut fishery since 1973. My family and the families of four crew members depend upon the halibut fishery for 55 to 60% of our total income. Since the fishery has gone to individual fishing quotas, most of my crewmen and myself, have invested heavily in quota shares. We were led to believe that we were to be the stewards of a fishery that has been a prime example of good fisheries management. Reducing the commercial share of the quota will put in question the ability to repay our loans.**

**In the Prince William Sound Area – A, the sport charter fleet has undergone uncontrolled growth, while the commercial fleet has been managed through abundance based management. It is grossly unfair for the sport charter fleet to expect more and more from a fishery that is already totally utilized and has a proven record of good fisheries management.**

**As a member of the Copper River/Prince William Sound Advisory Board, I was shocked by the Alaska Department of Fish & Game Division. Never in my twenty years on the board have I ever seen ADFG support an allocation issue. They deserve some type of reprimanding and should stick to management issues.**

**Please ask the North Pacific Management Council to drop consideration of the "fixed poundage allocation" as it has no place in good fisheries management.**

Sincerely,



**Lynn W. Mallory, Jr.  
F/V Nip 'N Tuck  
P.O. Box 206  
Cordova, Alaska 99574**

November 18, 1999

JAMIE ROSS  
BOX 3776  
HOMER, AK 99603

Chairman Richard Lauber  
North Pacific Fishery Management Council  
605 W. 4th Ave.  
Suite #306  
Anchorage, Alaska 99501-2252

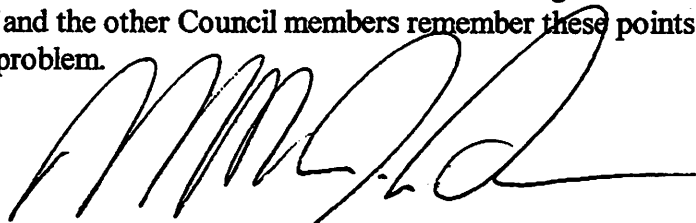
Dear Chairman Lauber,

I am writing to you as an Alaskan resident and commercial fisherman. I am totally opposed to the halibut sport-charter industry getting a fixed poundage allocation. Let them figure out a solution within the existing 1997 agreement. If the charter fleet feels this allocation is insufficient, let them buy quota as the vast majority of the commercial fleet has done.

Both charter and commercial users access a public resource for economic gain. Both user groups serve the public. Many forget "the public" is not only subsistence, sport, and those aboard a charter, but also includes those people patronizing restaurants and grocery stores the commercial fleet supplies. The charter industry has had several years to prepare a solution to the problem many have seen coming. Their three point solution? 1) Stall 2) Take from someone else 3) Don't share in conservation.

Meanwhile, the commercial fleet has bought into a program the Council approved and the State has promoted. Contrary to popular belief, most of us were not made wealthy by a large windfall, but have mortgaged homes, boats, and property to buy into the IFQ program. The IFQ program cut commercial longline numbers by almost half. Initially, nobody got to catch what they were accustomed to catching. To be viable we had to buy in or get out. Fine, those of us that remain have accepted these painful and costly transitions. The charter business needs to make some tough decisions now also. I hope both yourself and the other Council members remember these points as you try to resolve the charters' problem.

Thank you,



P.S. - IFQS DESTROYED MY HALIBUT FISHING  
CAREER - DON'T GIVE THE REST OF  
IT AWAY TO THE CHARTER BOATS PLEASE!

(MALCOLM JAMIE ROSS)  
HOMER, ALASKA

THEY NEED TO PAY  
FOR IFQS TOO!

Richard Lauber, Chair  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>  
#306  
Anchorage, AK 99501-2252

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NOV 23 1999

N.P.F.M.C

Treg Axtell  
1240 Sayles St.  
Ketchikan, AK 99901  
(907) 225-7282

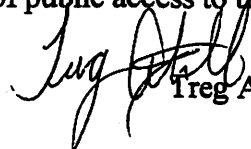
Nov. 17, 1999

Dear Richard,

I have several concerns relating to the upcoming North Pacific Fishery Management Council's (NPFMC) meeting on Dec 6, 1999 in Anchorage.

1. I am told that this council has no sportfish, especially guided sportfish, representation. This concerns me as a sportfisherman and a fishing guide. I am not excited about the commercial fishing bias apparent on the council, and the Alaska longliner's association's proposal to cap the guided sportfishery and sport halibut bag limits.
2. Why would the commercial fishermen be suggesting 4.7 to 6.2 million pound cap on guided halibut sportfishery, when their take has been in the neighborhood of 62 million pounds?
3. Halibut abundance has risen some 300% since the low period of the 70's, and the commercial harvest has increased proportionately, but the sport limit has remained at 2 fish per day. I feel that this limit should not be reduced except in times of dangerously low abundance, and when the commercial harvest is also reduced.
4. In consideration of alternatives, only alternative 1, "No Action" should be supported. Any of the other alternatives would have a significant impact on my livelihood, and also would privatize a strong public resource.
5. Sportfishermen would look forward to developing a comprehensive management plan for all of Alaska's halibut fisheries (including sport and guided sport) in a forum which has representation from guided and non-guided sportfishing interests. Each component of Alaska's halibut users should be considered as a part of the overall Gulf-wide utilization of halibut. This current NPFMC proposal, which is being promoted by commercial halibut fishermen would only provide a few more halibut for commercial use at the cost of public access to this plentiful public resource.

Thank you. Sincerely,

  
Treg Axtell





P.O. Box 1278 • Santa Maria, CA 93456 • (805) 937-7477 • FAX (805) 937-4497

November 16, 1999

NORTH PACIFIC FISHERY MGMT. COUNCIL  
RICHARD LAUBER, CHAIR  
604 W. 4TH #306  
ANCHORAGE, ALASKA 99501-2252

RECEIVED

NOV 23 1999

N.P.F.M.C

DEAR SIR;

I HAVE JUST BEEN INFORMED OF YOUR UP COMING PROPOSALS TO CHANGE THE BAG LIMIT ON THE RECREATIONAL HALIBUT FISHERY. I AM THE HEAD INSTRUCTOR OF THE PACIFIC FISHERMAN SCHOOLS . WE BRING A COUPLE OF GROUPS OF FISHERMEN UP EACH YEAR TO ALASKA, I ALSO SPEAK AT ALOT OF ANGLING CLUBS, SPORT SHOWS AND TACKLE SHOPS. I AM VERY CONCERNED THAT YOUR PROPOSALS WILL MAKE IT VERY TOUGH TO FIND ANYONE WHO WILL WANT TO GO TO ALASKA TO GO FISHING.

I NOTICE THAT THERE ARE NO SPORTFISHING INTERESTED PERSONS ON THE NPFMC. I ALSO HAVE BEEN INFORMED THE PROPOSED CAP FOR SPORT FISHERMEN CAME FROM THE ALASKA LONGLINE FISHERMEN'S ASSOCIATION WHICH HAS REPRESENTATION ON YOUR COUNCIL.

WHY ARE WE GOING TO BE LIMITED TO 4.7-6.2 MILLION POUNDS FOR THE WHOLE SPORTFISHING INDUSTRY. WHILE THE COMMERCIAL FISHERY TAKES 62 MILLION POUNDS, BYCATCH AMOUNTS TO ABOUT 12-14 MILLION POUNDS. NOT TO MENTION THE MILLIONS OF POUNDS THAT ARE WASTED AT SEA EACH YEAR.

SINCE THE 1970,S THE HALIBUT FISHERY HAS REBOUNDED TO SOME 300% AND COMMERCIAL HARVEST HAVE INCREASED PROPORTIONATELY. AT THE SAME TIME THE SPORT BAG LIMIT REMAINED THE SAME, 2 FISH PER DAY PER ANGLER AND WAS NOT INCREASED PROPORTIONATELY WITH THE STOCK ABUNDANCE. WE NEVER SHARED IN THE GAIN OF THE INCREASED STOCK SO WHY SHOULD WE HAVE TO SHARE IN THE PAIN ! THE CURRENT LIMIT IS 2 FISH PER ANGLER PER DAY I THINK IT IS A GOOD LIMIT AND SHOULD NOT BE CHANGED.

SPORTFISHERMEN WOULD GLADLY LOOK FORWARD TO DEVELOPING A COMPREHENSIVE MANAGEMENT PLAN FOR ALL OF ALASKA'S HALIBUT FISHERIES IN A FORUM THAT WE HAVE REPRESENTATION. THE CURRENT NPFMC PROPOSAL , WHICH IS BEING PROMOTED BY COMMERCIAL HALIBUT FISHERMEN WOULD ONLY PROVIDE A FEW MORE HALIBUT FOR COMMERCIAL USE AT THE EXPENSE OF THE PUBLIC ACCESS TO THIS STRONG PUBLIC RESOURCE. IN CONSIDERATION OF THE ALTERNATIVES, ONLY ALTERNATIVE 1, NO ACTION SHOULD BE SUPPORTED AT THIS TIME.

THANK YOU FOR YOUR TIME AND I HOPE YOU CAN UNDERSTAND OUR CONCERNS.

Sincerely,

DAN DUNLAP

cc: DENNIS AUSTIN, DAVID FLUHARTY, DAVID BENTON, JOE KYLE, JOHN BUNDY, RICHARD LAUBER, STEVE PENNOYER, BOB MACE, ROBIN SAMUELSON, GOVENOR TONY KNOWLES, FRANK RUE, COMMISSIONER, TERRY GARCIA, ASST. SECRETARY DEPT. OF COMMERCE, NOAA PENNY DALTON, DIR. OF FISHERIES, NOAA , SEN. TED STEVENS, SEN. FRANK MURKOWSKI & REP. DON YOUNG.

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

RECEIVED

NOV 23 1999

N.P.F.M.C

MONTEREY FISH MKT.  
 M.F.M. SEAFOOD, INC.  
 1582 Hopkins Street  
 Berkeley, CA 94707

Dear Chairman Lauber,

I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charter boats in 1997. Adopting a charter boat allocation based on the other options under considerations will hurt consumer access to halibut.

In making your decision, I urge you to give fair consideration to the consumer and not just those with time and resources to afford a trip to Alaska and a charter excursion.

Sincerely,

P.S.

As a fish wholesaler and retailer I purchase approximately 40,000 lbs of halibut a year and sell it to thousands of consumers. Halibut from commercial sources plays a major ~~key~~ part in the lively food of my employees and the employees of many restaurants we sell to, as well many thousands of consumers will not have access to this fine seafood if other than current charter boat allocations are adopted.

Paul Johnson  
 Pres. Monterey Fish

Scott Visscher  
2842 HC-60  
HNS, AK 99827

Honorable Rick Lauber  
Chairman  
North Pacific Fishery Management Council



NOV 24 1999

NPFMC

Sir,

To allow the Charter Industry a 25% fixed allocation of Halibut is completely unfair to Commercial Fisherman of Alaska and to Halibut Consumers worldwide.

Such a move would lower our IFQ quota as well as the worth of that quota. My family would suffer as a direct result as well as related businesses. In the face of low Salmon prices I and many others invested well beyond our original IFQ allocation so as to remain solvent. To have a large percentage of our quota given away to a business that entertains the moderately wealthy and above is patently unfair, unjust, and unethical.

I ask you to drop consideration of a fixed poundage allocation. The 1997 compromise by the Council was generous and allowed reasonable growth in the Charter Fleet. Beyond that, Charter Industry folks should have to buy shares of IFQ and work for what they have, not fatten up at the expense of hard working Commercial Fisherman.

Thankyou,  
Scott Visscher



*inua*

"The Spirit of Alaska"

RECEIVED

NOV 26 1999

N.P.F.M.C

November 24, 1999

NPFMC  
Richard Lauber- Chairman  
Linda Behnken

To Whom it may concern:

This letter is in response to the upcoming meeting concerning the halibut allocations. As a small business owner, with two retail outlets in Homer, the allocation of halibut for charter and sport fishing is crucial to our survival. No one entity, namely commercial fishing interests, should have the right to such a disproportionate amount of a resource, especially when so many businesses depend on that resource, in an area where employment opportunities are scarce at best. A full 75% of our customer base are halibut fisherman, and 50% of these are repeat customers, many from the lower 48. If the limit is cut to 1 fish per person, make no mistake, these people will not return. There are too many other opportunities for them to spend their dollars outside Alaska, and you will have succeeded in putting an untold amount of people out of business for the gain of a very few individuals. Lets hope that everybody looks at the big picture here, and not at just whom has the most money to spend to buy a resource which should belong to all.

William Lovett

INUA "The Spirit of Alaska"

Mr. Richard Lauber  
Chair  
NPFMC  
605 W.4th#306  
Anchorage, Alaska, 99501-2252

RECEIVED

NOV 26 1999

N.P.F.M.C



For a saltwater Adventure

P.O. Box 110792

Anchorage, AK 99511

Office: (907) 227-6439

FAX: (907) 344-4388

E-Mail: LeSeaChtrs@aol.com

Dear Mr. Lauber:

I wish to protest the proposals by the Alaska Long Line Fisherman's Association to cap the charter fleet and lower the bag limit of the public or clients of the charter boat fleet. At a time when the commercial fleet has increases in their allotment, they are trying to curtail the catch of the public.

NPFMC, whose board members consist of 100 percent commercial interest, regulate the halibut stock. There are no members from the sportsman (public) or the charter boat industry on the board of NPFMC. This is a very lopped side arrangement for the management of a public resource. This has the marking of greed with the fox guarding the hen house.

There is more than enough halibut to go around but if there comes a time to cut back on the catch for management then let the burden be born by all. The sports fisherman are individually licensed when they're on private or charter boats and they have as much right to the resource as the commercial fishery.

You may well be advised that commercial fishery in other parts of the nation have had severe limitations placed on them and in some cases the fisheries were completely eliminated. If the public access to its resources is denied, the backlash may have unpleasant curtailment placed on the industry as a whole. I hope that these views would be taken into consideration at the December 6<sup>th</sup>, 1999 NPFMC council meeting addressing a harvest guideline level on Alaska's guided halibut sport fishery.

Regards,

Dewayne Brantley  
Owner & Operator  
LeSea Charters



North Pacific Fishery Management Council  
Richard Lauber, Chair  
605 West 4<sup>th</sup>, # 306  
Anchorage, Alaska 99501-2252

Dear Chairman Lauber:

I operate a sportfishing charter business in the Juneau area and am a member of the Juneau Charter Boat Operators Association (JCBOA). Our group has 40 members representing some 60 or so boats operating in our area. I am writing in opposition of the action taken by the North Pacific Fishery Management Council (NPFMC) which would place a harvest guideline (GHL) cap on the harvest of guided sport anglers.

The NPFMC is the only such management council in this country that has **NO** representation in voting seats from the recreational fisheries. This federally supported regulatory body which is dominated by commercial interests should not be involved in regulating (restricting) a small sport fishery that competes for the same public resource.

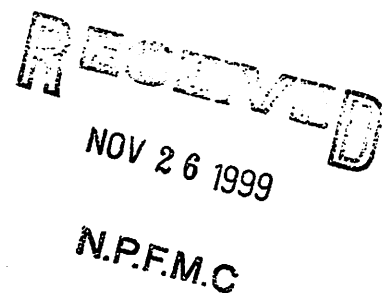
Alaska has 100,000 to 200,000 guided sport halibut anglers who take about 5 million pounds of fish annually, while Alaska's 3,700 commercial halibut IFQ holders take over 60 million pounds. Bycatch of halibut runs 12 to 14 million pounds annually and there are several million additional pounds of halibut wasted in conduct of commercial fisheries. Restricting or capping guided sport harvest of halibut should not even be considered until the sport harvest is at least equal to the commercial bycatch and wastage of this important Alaskan Sportfish.

Abundance-based management works in commercial fisheries where there are relatively few fishermen, each with a tremendous potential to harvest. However, in sport fisheries where you have hundreds of thousands of fishermen, each with a minute potential to harvest, such abundance-based management programs **DO NOT WORK**. Sportfisheries need stability and, in regard to Alaskan halibut, that equates to continuation of the existing bag limit which has been in existence for 25 years. That is the opportunity to catch two fish per day of any size per person. Sport anglers should not be expected to share the "pain" of decreased stock abundance (unless that abundance reaches the historic lows of the 70's) because sport anglers never had the opportunity to share the "gain" associated with increased abundance as did commercial harvesters. The sport halibut limit of two fish per person per day has been in existence for 25 years!

Given the high social and economic values of Alaska's guided halibut sportfishery and its low level of harvest, the only reasonable management plan is to continue the current plan. Simply subtract bycatch, commercial wastage, and projected sport harvest from total exploitable business and you have the amount available for commercial harvest. Local area management plans can be implemented to solve local issues.

Thank you for the opportunity to comment. Please put my name on your distribution list for information on this issue.

Respectively,



RECEIVED

NOV 26 1999

N.P.F.M.C

Richard Hansen  
3705 Arctic # 2163  
Anch. Ak. 99503

Dear Honorable Rick Lauber,

I am writing to you to appose actions that would provide a fixed poundage allocation for the halibut charter fleet.

I depend on the commercial halibut fishery for most of my income. I have a large investment in the I.F.Q. program. Reducing the commercial harvest will not only affect myself but businesses statewide.

The I.F.Q.'s are based on overall abundance, the catch limits vary from year to year.

The A.D.F.G. sponsored option to grant the charter fleet a fixed allocation in pounds which is not linked to abundance, is contrary to Alaska's management policy and gives the charter operators no incentive for conservation.

Establishing a priority preference for charter vessels will not only harm commercial users, but also local sport and subsistence users.

Recent allocation advocacy by A.D.F.G. Sport Fish Division is contrary to State policy.

I would please ask you to drop consideration of the fixed poundage allocation.

Sincerely,  
Richard Hansen

**Kodiak Association of Charterboat Operators  
P.O. Box 3641  
Kodiak, Alaska 99615**

**RECEIVED**

OCT 29 1999

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

Mr. Richard B. Lauber, Chairman  
The North Pacific Fisheries Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

RE: Response to the proposed controls to be instituted on the charterboat take of Pacific halibut.

Chairman Lauber and Council members;

The Kodiak Association of Charterboat Operators (KACO) believes that preliminary steps need to be taken to insure that all coastal residents of Alaska be treated in a fair manner when it comes to apportioning resources. The current management areas for halibut as established by the International Pacific Halibut Commission (IPHC) while useful for general biomass evaluation and commercial fishing regulation, were not created for, nor are they useful and accurate for the regulation and stock management of sports/charter caught halibut in relation to the economies of Alaska's developing coastal communities. KACO believes that subareas for 3A need to be established by the council so that all communities are not subsequently lumped in together when considering guideline harvest levels (GHL) and restrictions due to sport and charter take of halibut. KACO believes that the management areas developed for salmon by the State of Alaska would serve effectively when measuring and controlling the impact of sport and charter caught halibut.

Specifically, KACO believes that Kodiak must be set aside as a separate management subarea when considering the controls that may need to be implemented in regard to the burgeoning Homer/Deep Creek/Ninilchick sport and charter halibut fishery. Road system pressures from the Anchorage population and the tourists conveyed by large tour operations are having tremendous impact on the resources available within a few hours running time of Homer/Deep Creek/Ninilchick. The 1999 season shows the 261 active logbooks from Homer/Deep Creek/Ninilchick took out 40,510 client fishermen. This is not the case in Kodiak where the charter fleet consists of 97 logbooks taking substantially fewer client fishermen (exact figures were not available at the time of this letter) and may in fact never be the case in Kodiak since the costs of traveling to Kodiak from population centers are currently acting as a restriction to rampant sport and charterboat growth. Though there has been some growth in the Kodiak charter fleet, concomitant growth in charter clients has lagged and the current Kodiak fleet may be already overcapitalized. But in Kodiak, there is no shortage of halibut. Also, Kodiak villages are currently trying to expand their economic base by investing in the charter and lodge business (with charter fishing). If the entire Kodiak area (Salmon management Area K) is to be lumped with the lower Cook Inlet in terms of GHL restrictions, or as part of a moratorium on new entrants to the halibut charter business, unnecessary economic hardship will result. This is especially true in view of the declining oil dollars available from the state for investing in various attempts at village and small community development.

*Representing Kodiak's Professional Charterboat Operators*



**Kodiak Association of Charterboat Operators  
P.O. Box 3641  
Kodiak, Alaska 99615**

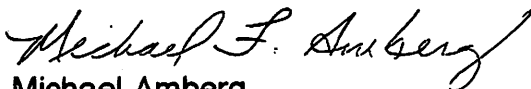
There are other factors too, that need to be taken into consideration when deciding whether to cut Sub-area K free from 3A. The Kodiak halibut sport and charterboat season starts later than Homer/Deep Creek/Ninilchick. This is due to several factors, but the primary one is due to weather and sea conditions. By the time the 50 or so active Kodiak charterboats get into full swing, the Homer/Deep Creek/Ninilchick charter operations may well have already taken the GHL. Restrictions would be put in place for all of Area 3A and the Kodiak season would be restricted or end before it had really gotten underway. This is why, concurrently with a Sub-area K designation, KACO believes that a system of super exclusive registration needs to be imposed. Operators would have to choose where it is they wished to operate and be restricted to that area for the season, or if a moratorium were to be put in place, for the duration of that moratorium, etc.

As KACO sees it, the Council is faced with the need to temper its management of the biomass with the socio/economic impacts on these coastal communities that are restricted by their location as to how they may expand their economic base. The Council has shown that it is responsive to these concerns by its instituting the CDQ program. We are not suggesting the need to give Kodiak incentive, but rather to see that it is a separate entity from the Lower Cook Inlet and much of the rest of Area 3A. The use of an a Sub-area K designation fits admirably the needs of Kodiak's charter fleet. The Council has considered Local Area Management Plans (LAMP) and so Area K can be seen as a logical progression from LAMPs.

Likewise, the Kodiak commercial fishing interests which may have differences with the charterboat industry, can see that cutting Kodiak Island loose from the rest of Area 3A makes good sense. Kodiak's large continental shelf east of town is not fished by the other communities' charter fleets, only Kodiak's. Such a healthy biomass should not be linked to the pressures put upon fish caught in the Lower Cook Inlet by its large sport/charter fleet. To this point the Kodiak Local Fish and Game Advisory Board appointed a committee to explore an Sub-area K designation for halibut and recommended splitting Sub-area K from Area 3A.

So this idea of splitting off Sub-area K from Area 3A is not new, but one that fits need, accuracy, usefulness, and sense in managing the sport/charterboat halibut take in the larger Area 3A.

Respectfully submitted,



Michael Amberg  
President, Kodiak Area Charterboat Association

*Representing Kodiak's Professional Charterboat Operators*

RECEIVED

NOV - 8 1999

NPFMC

HONORABLE RICK LAUBER  
CHAIRMAN  
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
605 West 4th Ave, Ste 306  
Anchorage, AK 99501

ROBERT W. CAMERON  
2120-41st ST.  
ANACORTES, WA. 98221  
NOV. 11-1999  
f/v LAUNI C

Dear Honorable Rick Lauber:

I am writing to you to oppose actions by ADFG and the North Pacific Fishery Management Council that would provide a fixed poundage allocation to halibut charter fleet.

My family and I depend on the commercial halibut fishery for a large percentage of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ, S because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and my boat. It will also impair the ability of people to repay both boat and IFQ loans.

All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under the rules adopted by the International Pacific Halibut Commission since 1923.

Delinking the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the State,s credibilty. Abundance based management has been a corner stone of a successful management program and it is not wise to abandon it.

Recent allocation advocacy by ADFG Sport Fish Division is contrary to state policy. The Sport Fish Division should stick to its job of management and leave allocation to the proper organizations.

Please ask the North Pacific Management Council to immediately drop consideration of the "fixed poundage allocation" since this option runs counter to fundamental management philosophy.

If the sport charter fishermen want halibut allocation they should buy it at the going price just like anybody esle.

even though I fished halibut since 1985, I had a small boat out of Kodiak and I couldn't always get way off shore to the rich halibut grounds due to weather on the Derby openers. So consquently I wasn't a big producer and wasn't awarded very many halibut IFQ poundage. I ended up having to buy 10,000 lbs of halibut IFQ at \$8.50/lb. in 1995.

So to reiterate,the sport charter fishermen should buy their allotment just like I had to do.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely, Robert W. Cameron  
owner-operator of Sauni-C

11/15/99

Dear Sir:

We are writing to express our serious concerns and worry over the proposals regarding allocation of halibut to the guided charter industry.

Twenty three years ago when the resource was scarce and prices low our family began fishing in 2 C, with small children aboard we continued to fish through the derby years etc. After receiving our modest IFQ quota we sacrificed and saved to buy additional pounds in our area. We knew about and supported the abundance based management of the resource and understood our quota would fluctuate with the health of that resource. Now we are faced with the possible fixed allocation of pounds to the charter fleet. A charter fleet whose harvest doubled between 1997-1998, our fishing efforts depend on being able to participate in the halibut fishery @ a reasonable level - This along with salmon fisheries provide employment for crew members and because we are year round residents of SE our earnings - both boat and personal are recycled in the area. Today's fisherman needs to be able to participate at a reasonable level in a variety of fisheries.

We would ask that all fisheries continue to be managed on an abundance based method to insure the health of the resource. The catch

level of the charter fleet for 1995 should be the basis for any allocation. The huge increase in catch levels from 1997-1998 should serve as a clear indicator of the future of the resource if measures are not taken.

Please consider our long term involvement in the 2C halibut fishery and most of all the health of the resource and our SE communities which depend on the commercial fishery.

Sincerely  
Amy + Mac Johnson

Amy + Mac Johnson  
423 Verstopia  
Sitka, AK  
99835

RECEIVED

NOV 17 1999

N.P.F.M.C



# *North Pacific Fisheries Association. Inc.*

HEADQUARTERS:

BOX 796 • HOMER, ALASKA 99603

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

REC-1

11/16/99

NOV 16 1999

Mr. Rick Lauber

N.P.F.M.C

North Pacific Fisheries Assn. is a multi gear commercial fisherman's association based in Homer AK. NPFA has been an active member in the Homer community since 1955. Commercial fishing has been the foundation of Homer's economy since before 1955.

I am writing to express opposition to the Alaska State Dept. of Fish and Game, Sports Fish Division proposal before the North Pacific Fisheries Management Council requesting a fixed poundage allocation of halibut for the guided charter industry. In addition Sports Fish Division proposes to base this poundage on 1998 catch data.

A fixed allocation goes against all biology based management plans, all of which are managed on abundance of the resource. To allow one group a fixed allocation means that in years of declining resource, all other user groups must lose resource share to the user group with fixed poundage's. My group of fisherman, and my community have survived a gut-wrenching adjustment to the current IFQ halibut management system. We have lost our shellfish fisheries here in Kachemak Bay. Most fisherman are hard pressed to find a stable fishery to count on to make those boat payments to the Alaska State Division of Investments. Halibut is one of the few fisheries the coastal commercial fisherman can count on. Many fisherman have went the extra step and borrowed to purchase more IFQ, to build their business. A fixed allocation to the halibut charter fleet would take directly out of commercial halibut fishing families pockets. Many would not financially survive declining resource years as more of the commercial halibut share would be given to the charter fleets to maintain their poundage allocation. In addition


the resource will surely suffer from near shore depletion as the charter boats hammer the local grounds trying to reach the unobtainable cap.

Halibut is certainly a large percentage (50%) of my annual income. My family of 5 has plenty of experience at baiting hooks and icing fish. IFQ's provided the time, economics provided the motivation to become more efficient.

NPFA was in support of the percent age share (125%) of the 1995 catch. We think that was a reasonable amount of fish for the halibut charter industry. We believe that the Sport Fish Division proposal will take directly from a commercial fisherman, coastal communities, and consumers of fine seafood.

In addition I believe it will result in severe inshore depletion problems. The Sports Fish Division proposal will allow for addition growth (at the expense of the commercial fleet) which will put more charter boats fishing near communities on day length trips. Many of those areas are already under to much pressure and addition charter effort will result in loses to subsistence, and sports fishers also as the near shore stocks are fished down. This new proposal is a bag of worms with little support from all user groups. The Sports Fish Division must rethink its proposal and return to the most agreed upon system of abundance based management for all users, the halibut charter percentage of the halibut TAC as 125% of 1995 catch.

We urge the North Pacific Fisheries Management Council to support the 1995 catch levels, with abundance based management for all user groups.

  
Donald R. Lane  
President

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**RECEIVED**  
NOV 23 1999  
N.P.F.M.C**CITY OF PORT ALEXANDER***P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2211***COVER STATEMENT FOR RESOLUTION 99-14**

Since the early 1900's Port Alexander and the waters surrounding it have traditionally been the home grounds for commercial fishing. Port Alexander is located in area 2C about 5 miles north of Cape Omaney on the southern tip of Baranof Island. During the 1920's Port Alexander began to evolve into a year round community and in 1974, was incorporated. It is a second-class city with a mayor/council form of government. The population is approximately 90 people.

Port Alexander is putting forth good faith effort in being responsible stewards of the resource. Our fishermen have fished under rules adopted by the IPHC since 1923, as well as the Pacific Salmon Treaty. In November, 1999, additional hardship was placed upon commercial fishermen. A 3% tax was put into law. Port Alexander's fishermen are hook and line. Many commercial fishermen will be paying out 7% of their income (4% from salmon) towards management and enhancement.

As a city we do not agree with the statement that "guided sport halibut fishery may not be able to adapt to sudden changes in harvest levels as easily as commercial fishermen." The hardship will affect us all. That is why a "share the pain, share the gain" philosophy is so important. Lifestyles and Livelihoods could be lost or seriously impaired. Port Alexander will be directly impacted by your decision. At risk is the stability and preservation of Port Alexander as a community looking forward to a secure and stable future.



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## CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2211

**RESOLUTION 99-14** A resolution for the city of Port Alexander supporting the 1997 Guideline Harvest Level already set by the North Pacific Fisheries Management Council, also supporting a percentage based allocation and not a fixed number.

Whereas: The history and culture of the community of Port Alexander is commercial fishing. During the 1930's it is written that Port Alexander harbored the largest fishing fleet in Alaska; and

Whereas: In Port Alexander's area, 2C, 97% of the guided sport clients are non-resident while 85% of the commercial quota in area 2C is held by Alaskans; and

Whereas: In area 2C, the largest increase of the guided sport halibut fishery has occurred. In contrast, area 3A has stayed roughly the same; and

Whereas: Port Alexander acknowledges that other areas should and can be managed differently to accommodate area specific problems. We are concerned with the rapid expansion of the guided sport fishery. The city of Port Alexander does not want to see the commercial fishing fleet be displaced by the guided sport fleet; and

Whereas: Presently there are <sup>few</sup> job alternatives in Port Alexander to sustain a family. With the exception of a few retired people and the 3 newly operating lodges, the remainder of the community is directly or indirectly affected socio-economically by commercial fishing; and

Whereas: A significant number of community members of Port Alexander have invested in IFQ because of the stability promised by the government. Reducing the commercial harvest will reduce the value of their IFQ, their boats, and will impair their ability to repay both boat and IFQ loans; and

Whereas: Along with the fair and equitable sharing of the resource, is the loss of Port Alexander's cultural identification with its past; and

Whereas: In years of low abundance the burden of conservation will be placed on the longline fleet and this would cause resentment, animosity and unnecessary hardship within our community that we as a city wish to prevent; and

Whereas: Port Alexander's commercial fishermen have supported conservation by accepting low quotas when biomass was low. Our local guided sport fishermen are agreeing to accept conservation measures as well as management tools being used for effective slow down measures. The city as a whole agrees to a "share the pain, share the gain" philosophy; and

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**RESOLUTION 99-14 PAGE 2**

Whereas: The city of Port Alexander feels it is poor public policy to give the guided sport halibut fishermen no incentive for conservation; and

Whereas: The city of Port Alexander recognizes the history of longlining by our local fleet as well as in our surrounding area in area 2C. We realize there is an open-ended reallocation from the commercial fishery to the guided sport halibut fishery occurring; and

Whereas: The commercial halibut fishery provides sustainable jobs in our community and benefits the community in a positive way. The commercial halibut fishery significantly contributes to the base economy of Port Alexander through its contribution of raw fish tax allotment as well as monies received from sales tax. Our raw fish tax in FY 99 was 11% of our city's total revenue. With further cuts to the city's revenue anticipated, the city will be increasingly dependant on this significant contribution to our city's budget from commercial fisheries; and

Whereas: The city of Port Alexander acknowledges the social and economic importance of the commercial halibut fishery to our community and to the state of Alaska; and

Whereas: The city of Port Alexander acknowledges that our newly developed local guided sport fishery is attempting to be accountable by being responsible resource users who are willing to adjust their activities to live within the Guideline Harvest Level already adopted; and

Whereas: The city of Port Alexander acknowledges the benefit of the guided sport fishery to our economy through its contribution of bed and sales tax, as well as its contribution to the state of Alaska; and

Whereas: The city supports the consensus vote from our local F&G Advisory Committee and recognizes that our local resource users want a sustainable and healthy fishery for subsistence, sport, commercial, and guided sport; and

Therefore be it resolved: The city of Port Alexander supports the 1997 Guideline Harvest Level already adopted by the North Pacific Fisheries Management Council, with our intention being that this will support fair and equitable access to the resource by all parties involved; and

Therefore be it resolved: The city of Port Alexander supports a percentage based allocation and not a fixed allocation for the guided sport halibut fishery; and

Further be it resolved: The city of Port Alexander urges the NPFMC to adopt effective slow down measures that keep the guided sport halibut industry within their allocation.

Passed, approved and adopted this 19 day of November, 1999.

In favor ALL opposed 0 abstained 0  
Signed Laura Rideout  
Laura Rideout, Mayor

Attested Lorraine C. Daly  
Lorraine Daly, City Clerk

17

Port Alexander Fish and Game Advisory Committee  
P.O. Box 8125  
Port Alexander, Alaska 99836

To: North Pacific Fishery Management Council  
All Members  
605 West 4 th. Ave. Ste. 306  
Anchorage, Alaska 99811

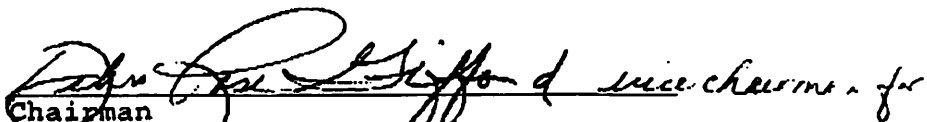
On November 15, 1999 the Port Alexander Fish and Game Advisory Committee held a public meeting. Seven of our ten advisory committee members were present as well as one interested citizen, who is a guided sport, sports and commercial fisherman. Our advisory committee is a diverse group of resource users. Sports, commercial and guided sports are all represented, however commercial fishing is the mainstay of our community and the advisory committee membership reflects this.

At this meeting a consensus was reached on the following issues

1. We did not support a fixed allocation for guided sports halibut industry. We favored a percentage based allocation.
2. Consensus was reached on supporting the 1997 GHM already adopted. Concern was expressed by the guided sports fishermen that they be able to assure their clients of catching at least one halibut a day with no interruption of their season. If management tools are used, then we feel the numbers set in 1997 would accomplish this goal and create a stable fishery for guided sports halibut and commercial fisherman alike.
3. We also came to consensus on management tools that the NPFM Council could use to accomplish their goal of the guided sports halibut fishery staying within their allocation.
4. We agreed it was inappropriate for the Alaska Dept. of Fish and Game Sports Division to advocate on allocation issues. The ADF&G Sports Division should stick to management not allocation.

We are submitting the following Resolution as a result of these consensus.

Thank you for your time and energy in considering our concerns.

  
Chairman  
Port Alexander Fish and Game Advisory Committee

||

Port Alexander Fish and Game Advisory Committee  
 Port Alexander, Alaska  
 Resolution # 1-99

Where as: Port Alexander is a small community whose origins came from commercial fishing and today is the mainstay of our economy

Where as: Opportunity will always be exploited. The fixed pound quota proposed by the Alaska Department of Fish and Game Sports Division would result in unfair allocation of the resource and make a mockery of the progress and sacrifices the commercial sector has already made toward conservation

Where as: Harvest by the guided sport halibut sector in area 2C has doubled twice since 1993 and 1998 numbers indicate continued growth

Where as: We support the separation of sport from guided sport

Where as: We support management measures being implemented the following year to provide the guided sport an uninterrupted season

Where as: We feel that possession should be defined as a person's permanent place of residence

Where as: We encourage the North Pacific Fisheries Management Council to consider as a management tool for guided sport halibut a set size limit of 32", mirroring the commercial size limit

Where as: Alaska Department of Fish and Game has available King salmon management tools to stay within the guided sport allocation of King Salmon in Southeast Alaska. We encourage the NPFMC Council to utilize similar tools to stay within the already allowed guided sport halibut allocation, i.e. non-resident halibut stamps, bag limits

Therefore be it resolved: Port Alexander Fish and Game Advisory Committee supports the 1997 Guideline Harvest Level adopted by the NPFMC with our intention being that this will support fair and equitable access to the resource by all parties involved and further

Be it resolved: We support a percentage based allocation and not a fixed allocation for the guided sport halibut industry and further

Be it resolved: That the NPFMC adopt effective measures that constrain the guided sport halibut industry to their allocation. Share the pain, share the gain.

Adopted this 17<sup>th</sup> day of November 1999  
*[Signature]* Chairman *[Signature]* Secretary

Vote 8 In favor  Oppose  Abstained

**RECEIVED**

NOV 23 1999

November 23, 1999

N.P.F.M.C

Mr. Chairman and council members :

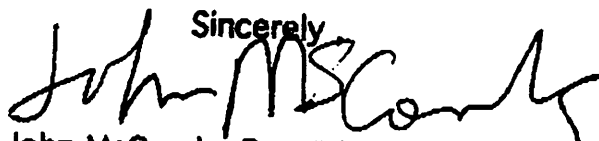
Resource management is a peculiar beast . In 1995 , the I.F.Q. program was put into place . Strange that the user group without an identity , the charter industry , was excluded . It is now graphically apparent to impose a moratorium at the highest level of participation and allocate 125% of the 1998 charter harvest would invalidate any advances made . The percentages and ratios have been established , so the logical course is to base any allocations on 1995 or prior and adjust accordingly . I have borrowed money to purchase additional I.F.Q.'s and the proposed allocation of 125% of 1998 could equal 40% of the total 3A quota or a 40% reduction in my I.F.Q.'s , thus making them next to worthless . I have contacted C.F.A.B. and explained this to them and that they could expect a default on my loan . As a Ninilchik fishermen , a big problem is , I've already been displaced and uncompensated by the new charter fleet . In Cook Inlet , as we witnessed last winter , a special interest board of fish eviscerated the salmon management plan . The final outcome was a 42% reduction to the drift fleet and a wholesale allocation of fish , primarily to non-resident sportfishermen . Dr. John White , then chairman of the board of fish , in the supposed role of King Solomon and with the help of vice-chair Coffey's lap top computer , spouted complex stepdown plans , all voted up , 7-0 . A public process ? Ha ! The fundamental problem here is the board of fish acted out a pre-cast political agenda , embracing allocation issues , entering a realm of social science , making up rules for behavior ; for men . In 1999 , three meetings on Cook Inlet coho , in 1998 a 5 million return of pinks to the Kenai and not one extra opening . Pardon my digression . Part of the problem in the Cook Inlet salmon management was/is a mixed stock fishery . The old plan had the 2nd run Kenai River reds identified as the backbone of the commercial fishery , even though 20% of the harvest was sport . The board of fish had stock separation and chose the dead end road of allocation . You can't make everyone happy and so in making this mistake , Dr. White will be , by some , forever perceived as a thief with a gavel .

The governor has pretty much invalidated my limited entry permit with his biased board of fish and their allocation path . The whole basis of the I.F.Q. program now becomes suspect . Halibut has always been a commercial fishery , often times a brutal one . The derby days are gone and the I.F.Q. program was sold on the basis of safety and economics .

continued .

Please have the courage to make allocations consistent with the program already in existence . !25% of 1995 . Thank you .

Sincerely

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

John McCombs Box 87 Ninilchik, Alaska 99639 .



Post Office Box 20761 • Juneau, Alaska 99802

Telephone: (907) 463-3830 • Fax: (907) 586-6020

Rich Lauber, Chairman  
North Pacific Fishery Management Council  
605 W 6th #306  
Anchorage, AK 99501

RECEIVED  
NOV 23 1999

November 18, 1999

N.P.F.M.C

Dear Mr. Lauber

\*Comments for the record

Territorial Sportsmen, Inc. is a Juneau based sportsmen's organization that has been active in Alaskan resource issues since 1947. Our membership numbers approximately 1900 individual's who reside mostly in the Juneau area. We support conservative management and public use of Alaska's wildlife resources.

We are writing in opposition to the Guideline Harvest Level proposals which are being proposed for Alaska's guided halibut sport fishery. Any of the "action" alternatives would restrict recreational use of this strong public resource. The proposed guideline harvest levels are entirely too low to provide for fair and reasonable non-commercial use of our halibut resource.

Alaska's sports halibut harvest would have to increase substantially before it even equals commercial by-catch and wastage. The NPFMC should not be considering restricting recreational use of the public resource at such a low level.

Further, we feel that the sport halibut bag limit should remain two fish per day of any size per angler. This bag limit has been constant since the 1970's. Recreational angler opportunity to access our halibut resource never increased, as did that of commercial fishermen, during rebuilding of the halibut biomass. Because of this, the sport bag limit of two fish per day should remain in effect at all but historically low levels.

Finally, we feel that fair process and adequate representation are key elements of public process. Given that the NPFMC lacks representation from the sport fisheries, the council should not be making regulations on the user group that has no voting seats. This is especially true since the commercial representatives voting on the NPFMC actually compete for fish with the sport fishery which they are regulating. This is not fair public complete process.

Thank you for the opportunity to comment.

Sincerely,

Tom Weske  
Vice-President

CC: Dennis Austin  
David Fluharty  
David Benton  
Joe Kyle  
John Bundy  
Richard Lauber  
Bob Mace  
Steve Pennoyer  
Robin Samuelson  
Linda Behnken  
Kevin O'Leary  
Governor Tony Knowles  
Frank Rue  
Terry Garcia  
Penny Dalton  
David Dicks  
Ted Stevens  
Don Young



**F/V Ocean Challenger, Inc.  
ARNOLD H. JARDSTROM, PRES.  
P.O. BOX 2120  
FT. BRAGG, CA., 95437  
(707) 964-1791**

**NPFMC  
605 W 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501-2252**

11-17-99  
**RECEIVED**

NOV 23 1999

Dear Chairman Lauber,

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

I am adamantly opposed to the North Pacific Fishery Management Council and ADFG'S action that would provide a fixed poundage allocation to the halibut charter fleet.

In the last 45 years of my fishing career ( fishing blackcod and halibut in Alaska since 1980), my family as well as my crew and their families have struggled through numerous changes in the fishing industry. We have always relied on a sustainable resource for a living and understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest.

As a commercial fisherman, halibut makes up more than half of my income. Since the implementation of IFQ's, I have invested over \$1,000,000 in quota and vessel upgrading. Excluding the charter fleet halibut harvest from abundance based management is poor public policy, and contrary to state policy. Under ADFG's Sport Fish management proposal in the years of lower abundance Alaskan commercial halibut fishermen's catch share would decrease while charter fishermen and their predominantly non-resident clients would take no cuts. All of the investments made by commercial fishermen, as well as the companies, canneries, restaurants, etc., would be seriously jeopardized.

Please advise the North Pacific Fishery Management Council to decidedly drop consideration of the fixed poundage allocation since this option runs counter to fundamental management philosophy. The council should set the charter allocation at 125% of the 1995 harvest since this was a

generous compromise in 1997 that allowed reasonable growth. Or, let the charter fishermen buy quota for their particular areas just as the commercial fishing fleet has had to do.

Thank you for your sincere consideration in this matter. The commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific halibut Commission since 1923. Abundance based management has been a corner stone of a successful management program.

Sincerely, Arnold Jarstrom

A handwritten signature in cursive script that reads "Arnold Jarstrom". The signature is written in black ink and is positioned to the right of the typed name.

TO:

18 Nov 99

RECEIVED  
NOV 23 1999  
N.P.F.M.C

FROM: Butch Sims  
8530 E 17<sup>th</sup> Avenue  
Anchorage, Alaska 99504

SUBJECT: Potential Change to the Cook Inlet Halibut Fishery

1. I'm writing this letter for two reasons. First, I am a Charter Boat operator, who offers Halibut charters to friends, relatives and their friends or relatives, who don't have either a boat or the experience to take advantage of Alaska's best Halibut fishery. My rates are far below most other commercial operators and often result in break-even or out of pocket expenses, just to provide the experience of catching what is often the largest fish these folks have ever caught and or seen in some cases. Most of these folks are either retired or elderly living on a reduced income. At any rate, they fish with me because they can't afford to buy or maintain a boat large enough to safely handle the waters of Cook Inlet or the Gulf of Alaska or to pay the rates charged by the other charters operating out of Deep Creek or Homer. Yet they want to take advantage of the plentiful Halibut available in the waters of central Alaska. Secondly, I'm writing as a dedicated sport-fishing enthusiast, who "got hooked" on Halibut on my first charter back in the early 80s. I've been fishing the waters of Cook Inlet and the Gulf around the Kenai Peninsula since 1987 from my own boat. The Halibut fishery has continued to improve each year even though more and more charters show up each year.
2. As both a charter operator and an avid Halibut fisherman, I've been following the myriad of proposals to "change" the fishery. The only "change" needed in the Cook Inlet/Gulf of Alaska Halibut fishery is to keep the public citizen as the major concern in the issue. The average Alaska resident or tourist for that matter is entitled to enjoy a "public fishery". The state of Alaska thrives on tourism and sport fishing and it has been documented on many occasions, a sport caught fish is more valuable to the community and the state of Alaska than a commercial caught fish. This is true for Halibut as well as Salmon or Trout. Sport fishing enthusiasts don't throw away millions of pounds of Halibut or other sport fish as "by catch" like our commercial long liners do. Sport fishing accounts for about 10% or less of the annual catch of Halibut while a relatively few commercial long liners (as compared to the percentage of sport fishermen) have been catching 60 million pounds or more of Halibut annually.
3. It is my opinion and that of all my sport fishing friends as well as most of my charter operator friends that to further limit sport caught Halibut by reducing the daily or possession limit of Halibut is ludicrous. Commercial long liners continue to catch millions of pounds and to waste millions of pounds annually. Commercial "by catch" exceeds the total annual take of the sport caught Halibut fishery within the Gulf of Alaska and Cook Inlet as well. I've caught many "chickens" with distorted mouths damaged after being on a long liners' hook for hours and hours. If any reduction is necessary and that is very questionable at this point, the only equitable way to do so is to reduce the commercial share. I and everybody else in the state, not carrying a commercial Halibut quota will agree that sport fishing will never impact a healthy fishery and the Halibut fishery in Cook Inlet/Gulf of Alaska has been improving steadily for several years. This increase has actually resulted in an increase in the "Commercial" share of Halibut, but the daily/possession limit for sport caught Halibut hasn't seen an increase in many years.
4. I could go on forever about reasons why "commercial" Halibut long liners should take a hit, but I won't. Your challenge as a government representative dealing with this very important issue is to act in the best interests of the resource and the public. You would be doing an injustice to the public to allow a reduction in the daily or possession limit of sport caught halibut. Two fish limit is small enough to have little or no impact upon the Cook Inlet/Gulf of Alaska Halibut fishery. If a reduction is deemed necessary after a validated analysis of the fishery has been conducted, then reduce the commercial catch by 5%. It's impact would be minimal to them, but taking half of the sport caught catch would be devastating to the sport fishing fleet and to the many of us who enjoy Halibut fishing as a way of life.

5. The last issue I'm concerned with is the suggestion that a cap be placed upon the number of charter operators catching Halibut. Various target dates and years of experience have been rumored, but to consider any cap at all would have a serious impact upon the public at large. I'm sure you're well aware of what competition does for business. The fewer operators, the more the market will bear. That always means the average public will pay more for the privilege of fishing for a public resource simply because the few commercial Halibut quota permit holders want to continue to plunder the resource. Please do not allow this inequity to be considered. Do not limit the number of charter operators, as those performing well will stay in business and those who don't will simply fade away. Neither will have a significant impact upon the Halibut fishery in general. Don't allow the daily/possession limit to be reduced as it could result in the trip just not being economically practical for many folks to make the trip to Alaska or the Charter worthwhile for only 1 fish. Don't make any change just to satisfy the few commercial Halibut quota permit holders. Any change should be based upon sound and well-documented evidence of need for change. Please keep the public interest in the forefront of your mind as you provide input to the upcoming meeting of the North Pacific Fishery Management Council. Thank-you for the opportunity to tell my side.

BUTCH W. SIMS  
OWNER/OPERATOR, WILDMAN CHARTERS

*B. W. Sims*

# Alaska Longline Fishermen's Assoc.

P.O. Box 1229 Sitka, AK 99835 (907) 747-3408

RECEIVED

NPFMC  
605 West 4th Avenue, Ste. 306  
Anchorage, AK 99501

NOV 24 1999

November 18, 1999

N.P.F.M.C

Dear Members of the Council,

In December the Council will be reviewing the analysis of the halibut guided sport (GS) management plan. I wanted to take this opportunity to remind the Council of the history of this issue, and to provide the Council with our Association's comments.

### GS Management: A little history

In 1993, the Council first recognized the need to develop a management plan for the GS fishery. GS fishermen claimed they were unfamiliar with the Council process, and asked for time. ADFG sport fish division claimed that fears concerning future growth in the GS harvest of halibut were unfounded, and likewise asked for time. The Council accommodated these concerns, placed further consideration of the issue on the slow track, established a Committee, and make every effort to include the GS operators in the process. Now, **six years later**, the Council is once again talking about taking action. During this time, the GS halibut harvest has doubled, and if one believes ADFG's 1998 numbers, doubled again between 1997 and 1998 in 2C. Clearly the years of delay have benefited the GS sector, allowing a continued reallocation of halibut from the traditional longline sector to the GS sector.

In 1997, the Council approved a Guideline Harvest Level (GHL) for the GS sector that allocated GS operators their historically largest catch plus 25% for additional growth. To further accommodate the GS sectors' demand for a continuous season of historic length, the Council defined the GHL as a trigger; when end-of-season data indicated that the GS harvest had neared, reached or exceeded the GHL, pre-approved management measures to slow down harvest by clients on GS vessels would be implemented the following year. By definition of the GHL, **under no condition would the GS sector be shut down in season.** The Council then tasked the GS sector with developing the management measures to slow down harvest if and when such measures should be needed.

### The ADFG Alternative

Because NMFS decided that the GHL could not be submitted to the Secretary without the "slow down" measures triggered by approaching the GHL, the issue was once again brought back to the Council. At that point, the task before the Council was to **identify effective management measures to constrain the GS halibut harvest to the GHL approved in 1997.** Instead, the Council adopted for analysis an alternative proposed by ADFG that completely negates the GHL. The ADFG alternative allocates a fixed amount of halibut to the GS sector that would not be reduced proportionate to the total quota or biomass--in fact, it would not be reduced at all until the halibut biomass experienced significant stock decline, and then would only be reduced by a set percentage--again disproportionate to the biomass reduction. For example, under the best case scenario from a longline perspective, longliners will have taken a 40% reduction in catch before the GS sector takes any cuts--and then the GS allocation will only be cut by 10, 15 or 20%, depending on the "set percentage" the Council chooses. Under the worst case scenario, again from the longliners perspective, the longline fleet will have taken a 60% cut before the GS sector faces any reduction in quota--and again, the GS sector will only be subjected to **at most a 20% reduction.**

It is extremely difficult for our Association to understand why the Council took this step backwards, especially since the 1997 GHL was never reconsidered. We also find ADFG's departure from abundance-based management completely incomprehensible when the State's mantra during the Pacific Salmon Treaty process has been "share the gain, share the pain." What kind of commitment to conservation can be expected from a fleet that is immune to biomass reductions? And what kind of message is sent to the longline fleet that has repeatedly demonstrated its commitment to conservation of the halibut resource for over sixty years? We can not believe the Council intends to place one group outside the bounds of the resource while expecting another group to pay all the costs of conservation. We can only assume that both the Department and the Council failed to understand the implications of the ADFG proposal, and that either in December or February the fixed allocation will be deleted.

Incorporating the 1998 data into the analysis

Inclusion of the 1998 data in the analysis process is dismaying for two reasons. First, the Council adopted an allocation in 1997, and should not be renegotiating that allocation now simply because NMFS demanded that the "slow down" measures be sent to DC with the allocation. And second, the accuracy of the 1998 data is highly suspect for reasons explained below.

The information made available to date indicates that while the abundance of halibut remained roughly the same in area 2C between 1997 and 1998 and the numbers of anglers fishing for halibut from charter boats did not change significantly, halibut removals by the GS sector doubled. Apparently the increase came in the size of the halibut caught by GS clients--i.e., the halibut GS clients caught in 1998 were roughly twice as big as the fish caught by GS clients in 1997. Unfortunately, ADFG sport fish department has not been able to provide effort data for either 1997 or 1998, nor have they been able to explain the sudden weight gain of halibut taken by the GS sector. The Council is tasked with using "the best available information." We question whether the 1998 data fits this description.

In closing, the Council adopted a GHL in 1997 that was more than fair to GS operators, guaranteeing them a continuous season of historic length and granting them 125% of their biggest harvest. Current efforts to add new alternatives and questionable data are yet another attempt to delay and confound the process. The task before the Council is to approve effective management measures to constrain the GS sector to the GHL approved by the Council in 1997. We urge the Council to evaluate the analysis from this basis, to remove alternatives from consideration that do not further this goal, and to move ahead with final action as quickly as possible.

Thank you for the opportunity to comment.

Sincerely,

Dennis Hicks, ALFA



cc: Governor Knowles  
Senator Stevens  
Senator Murkowski  
Representative Young  
Halibut Coalition



11-16-99

We are a Marketing Company for Fisherman's co-ops and small fish plants in Alaska. We buy & sell approximately 5 million pounds of halibut each year. The idea of giving a fixed amount of product to one user group is insane. The volume of product must fluctuate with the resource for all parties. Furthermore the economic impact on the small fishing communities of Alaska would be devastating. Many of these communities have no sport fishery. On top of the economic impact in Alaska, it is totally unfair to cut back on the availability of this product the vast majority of the public that cannot afford a fishing trip to Alaska.

Sincerely

A handwritten signature in cursive script that reads "David E. Stafford".

David E. Stafford

President

Shadow Marketing inc.

November 16, 1999

Rick Lauber  
Chairman-North Pacific Management Council  
605 W. 4th Ave  
Suite #306  
Anchorage, Ak. 99501-2252

RECEIVED

NOV 29 1999

N.P.F.M.C

Dear Chairman Lauber:

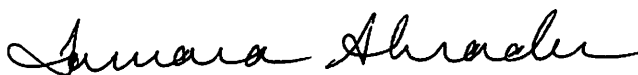
I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charters in 1997. I am a commercial halibut fisherman who has quota in Area 3A, and an increased allocation to the charter fleet with no corresponding decrease in years of lower abundance, will continue to take equity out of my pocket. I have purchased every pound of halibut quota with financing through the State of Alaska. As a commercial halibut fisherman, I am affected in years of declining abundance, and I feel that it is patently unfair that the commercial sector bears the burden for conservation of a public resource. I have loans which I hope I can cover in years of decreased quotas. I have to plan ahead for those years. Why am I any different than any other halibut resource user? Why should a charter boat operator who is asking for a set allocation to be GIVEN to him, be any different than I am? What makes them ENTITLED to a set income? This is about greed.

I don't argue the fact that the commercial guided fleet needs to make an income. Fair enough. My problem is that a fixed allocation will take equity from my pocket. I have not had one pound of halibut quota given to me, and based my decisions to buy quota with a loan from the State of Alaska, on a stable system of management from NMFS. To radically alter this system by a set allocation will make it very unattractive for lending institutions to consider halibut quota loans in Areas 2C and 3A. There is no incentive to make loans that will continue to lose equity at an accelerated rate.

I realize that allocation issues are not easy. However, I feel that there is an opportunity to make this proposed allocation better. I would urge you to do so by adopting the 1995 GHIL with no minimum allocation-it must fluctuate with declining population levels. If the charter fleet needs more poundage to catch, let them buy IFQ's, using the same requirements the commercial halibut fleet does.

Thank you for your time.

Sincerely,



Tamara Shrader  
P.O.Box 2601  
Homer, Ak. 99603  
(907)-235-7670  
skua@ptialaska.net





## Lone Fisherman, Inc.

John C. Phillips, Pres.  
Maura J. Phillips, Sec. Tres.  
P.O. Box 1315  
Petersburg, AK 99833  
PH: 907-772-2554  
FAX: 907-772-2553  
EMAIL: lfincjimp@mitkof.net

RECEIVED  
NOV 25 1999  
N.P.F.M.C

November 22, 1999

Honorable Rick Lauber  
Chairman  
North Pacific Fishery Management Council  
Anchorage, AK. 99501-2252

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. We choose to move from Pelican, leaving being a home. In Pelican, aside from the local interest in trying to survive and remain residents of rural Alaska, we have the expanded charter operations that currently exist in and around Elfin Cove (which bleeds over into Pelican). Over the years, 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 ever sees them.** Where do these fish play into the rapidly growing sport quotas? 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's watchful, armed 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 commercial 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 commercial fisherman, have supported conservation, accepting quota reductions when the council deemed necessary.

With the sport industry growing at such outrageous rates, it seems only fair that they are required the same regulations as others harvesting the same 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, figures that are not logged and accounted for by organizations like IPHC or NMFS or even ADFG, 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 the farmed halibut to their established markets? When the commercial fisherman are pushed out of business, who will finance the state, banks, and processing plants when boats are repossessed? We have invested heavily since the allocation of IFQ's and without our halibut harvest, we would be looking at serious problems with our loans. **Commercial fishing is the number one industry in Alaska.** The spiral effects of the loss of commercial halibut fishing would be devastating to our states economy!

I know you have heard it before but the Alaskan factor is of extreme importance here. With the logging industry shut down, the oil industry fluctuating, and the Alaskan economy seeing challenging times, it is important that this factor be heavily weighed. We need to work to keep our economy strong. The commercial halibut fishing industry is a vital part of our economy. Alaskan fisherman hire Alaskan crews and contribute heavily to local and state economies.

John, 41 years old, is the fisherman in the immediate family. His is a **lifelong Alaskan and an Alaskan Native**. He was literally brought up by both of his parents who are also life long Alaskan fishers. John learned to walk on his parent's fishing boat. He has spent every single summer making a living with his family on the waters of Alaska. John was born a fisherman, remains a fisherman, and fishing is all he knows. Many of the charter boat operators are fully employed, mostly down south, in the winter and come up and do the sport thing for adventure, fun, and yes, profit. We as a commercial fishing family only have one income and depend on that income to raise our children and keep our boat up so it can continue to fish another season. It costs us many thousands of dollars to adhere to all the new regulations that we need to comply with in order to continue fishing and continue fishing safely. This brings up another issue. As long liners, we will be taxed an additional 3% this coming season by NMFS while the local coast guard does all of the patrolling and vessel boardings. **If the sport industry is harvesting fish, are they going to have taxes implemented upon them? Are they going to get patrolled and have vessel safety checks and hold inspections?** The commercial fisherman can't afford to keep taking it in the shorts.....taxes, regulations, quota cuts, and now this sports allocation. Most commercial fisherman feel like they are being slowly forced out of business. Let's show them that this is not so!!!

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. So should every other user group.

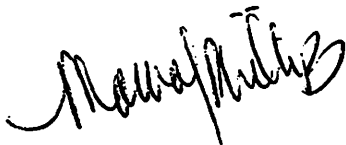
Significantly, 97% of the charter boat halibut harvest goes to nonresident catches and only 3% is resident catches. What are the implications of this to Alaska's economy? I say, extremely far reaching. The traditional commercial harvesters and local residents should have priority in harvesting the resource. **However, any user 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.**

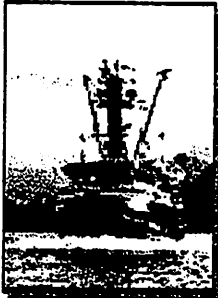
**Again, I need to tell you that the impact to our life long Alaskan survival will be severely impacted in a very negative way if this GHL proposal is to go into effect. Please don't destroy our ability to be productive, healthy, hard-working contributors to our local and state economy.**

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 that resource is healthy. I appreciate your commitment. **I simply can NOT see you making a mistake now and allocating anything different than last years GHL to the sport charter industry.**

Thank-you.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. W. Phillips".



## **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](mailto:lfincjmp@alaska.net)

cc: Mr. Joe Kyle  
Pacific Associates, Inc.  
234 Gold Street  
Juneau, Ak. 99801

Deputy Commissioner David Benton  
ADFG  
PO Box 25526  
Juneau, Ak. 99802-5526

Representative Don Young  
House of Representatives  
2111 Rayburn Building  
Washington, D.C. 20515-0201

Senator Frank Murkowski  
U.S. Senate  
706 Hart Building  
Washington, D.C. 20510-0202

Senator Ted Stevens  
U.S. Senate  
522 Hart Building  
Washington, D.C. 20510-0201

Honorable Fran Ulmer  
Lieutenant Governor  
State of Alaska  
PO Box 110015  
Juneau, AK. 99811-0015

Linda Behnken  
P. O. Box 1229  
Sitka, Ak. 99835

Petersburg Vessel Owners Association  
P.O. Box 232  
Petersburg, AK. 99833

Fishing Vessel Owner's Association  
Room 232, West Wall Building  
4005 20th Ave. W.  
Seattle, WA. 98199-1290

RECEIVED

NOV 30 1999

N.P.F.M.C

Dear Council members,

I would like to express to you a few thoughts about halibut allocation. My name is David Barth. I am 44 years old, married, with 2 children. We lived in Petersburg for 10 years and now I commute from our home in Washington. I sold my power troll permit last winter, after 20 years of trolling, to concentrate my fishing career in long-lining.

Beside the 20 years of experience I have invested in my business, I have loan balances of \$310,000.00 at First Bank in Petersburg and \$285,000.00 with N.O.A.A./N.M.F.S. The loan proceeds were used to purchase halibut quota share and a vessel.

Now another user group wants to take a large percentage of my quota from me, for nothing. The charter catch needs to be capped, and it needs to be managed on an abundance basis, just as my catch is. It should be capped at the 1997 S.H.A.

Before I began my commercial fishing career, I was an avid sport fisherman, and I still am, though I rarely have time to do it. I know that a customer on a charter boat does not need to kill large numbers of halibut to have a memorable Alaskan experience. In fact,

halibut are tough enough to be a catch and release target. Customers could catch until they are satisfied, then keep one fish to take home and eat.

There are thousands of commercial fishermen, like myself, who have far too much time and capital invested in our businesses, and the fish we depend on, to see another user group take from us for no better reason than greed. We need your help in establishing some common sense in the regulation of the charter boat fishery.

Thank you for your time on this matter.

Sincerely, David Barth

DAVID BARTH

12816 311<sup>th</sup> AVE, S.E.

SULTAN WA 98294

360 793 1965 HOME

907 772 2108 BOAT IN HR.

907 723 1107 CELL PHONE

NOVEMBER 30, 1999

MR. RICHARD LAUBER  
CHAIRMAN  
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
605 WEST 4TH AVENUE, SUITE 306  
ANCHORAGE, AK 99501-2252

RECEIVED

NOV 30 1999

N.P.F.M.C

DEAR CHARMAN LAUBER,

I AM A THIRTY THREE YEAR RESIDENT OF ALASKA. I HAVE BEEN INVOLVED WITH COMMERCIAL FISHING IN ALASKA SINCE I ARRIVED IN 1966. OUR SONS WERE BORN AND HAVE BEEN RAISED HERE IN KODIAK, AND THEY HAVE BEEN FISHING SINCE THEY WERE ABLE TO GO OUT ON THE BOAT.

I WOULD LIKE TO COMMENT ON THE PROPOSAL TO ALLOCATE HALIBUT TO THE COMMERCIAL CHARTER SPORT FISHING FLEET. I FEEL THAT THE ADF&G'S PROPOSAL TO GIVE THE COMMERCIAL CHARTER FLEET A PERMANENT POUNDAGE ALLOCATION NO MATTER WHAT THE CONDITION OF THE RESOURCE IS AGAINST ALL OF THE STATE'S RESOURCE MANAGEMENT DECISIONS IN THE PAST, AND IS CRAZY.

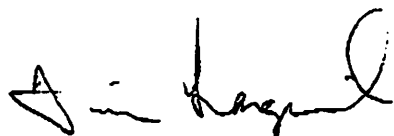
I DO NOT KNOW WHAT THE MAGNITUDE OF THE INVESTMENT IN HALIBUT IFQ'S IS BY ALASKANS IN AREAS 3-A & 2-C, BUT I AM SURE IT IS MANY, MANY MILLIONS OF DOLLARS. BY PURCHASING IFQ'S, MANY ALASKANS HAVE INVESTED IN THEMSELVES, AND IN THE STATE; IN MOST CASES THIS INVESTMENT IS ALSO ACCOMPANIED BY DEBT.

IN OUR FAMILY'S CASE MY CORPORATION AND MY SONS HAVE INVESTED \$ 934,643.00 IN 3-A HALIBUT IFQ'S SINCE THE INCEPTION OF THE PLAN IN 1995. IN ADDITION, I HAVE BUILT A NEW 58 FOOT STEEL VESSEL FOR \$1.1 MILLION WITH THE INTENT OF PROVIDING MY SONS WITH A FUTURE IN COMMERCIAL FISHING SO THAT THEY MAY EARN A LIVING IN ALASKA. THE INTENT IS THAT MY SONS WILL BE ABLE TO PAY OFF THEIR IFQ DEBT, AND PURCHASE MORE IFQ'S IN THE FUTURE IF THEY CAN AFFORD THEM, AND ULTIMATELY TAKE OVER THE FISHING OPERATION.

I WOULD LIKE TO POINT OUT THAT GIVING THE COMMERCIAL CHARTER FLEET A LARGE PORTION OF THE QUOTA IS GOING TO HAVE SEVERE ECONOMIC IMPACT ON MANY ALASKANS. HAVING TO MAKE PAYMENTS ON YOUR ORIGINAL INVESTMENT WITH YOUR EARNING POTENTIAL HAVING BEEN SIGNIFICANTLY RESTRICTED IS GOING TO CAUSE MANY ALASKANS TO SUFFER SEVERE FINANCIAL LOSSES.

IF THE COMMERCIAL CHARTER FLEET NEEDS MORE QUOTA, THEN I WOULD SUGGEST THAT THE NPFMC MODIFY THE IFQ SYSTEM SO THAT THE COMMERCIAL CHARTER FLEET CAN PURCHASE AND USE QUOTA FOR THEIR COMMERCIAL SPORT FISHING OPERATION JUST LIKE EVERYONE ELSE DOES WHO WANTS TO CATCH MORE HALIBUT.

A LIST OF OUR IFQ PURCHASES ALONG WITH OUR IFQ ID NUMBERS IS ATTACHED IF ANYONE CARES TO VERIFY THE NUMBERS.



TIM LONGRICH  
F/V SHUYAK  
BOX 2494  
KODIAK, AK. 99615

GOVERNOR KNOWLES  
11/30/99; PAGE 2/2

### 3 A IFQ,S PURCHASED BY LONGRICH FAMILY

OWNER	AREA	UNITS	COST	UNIT COST	1999 LBS
PETE	3 A	123,499	\$ 94,451	\$ .74	16,477
PETE	3 A	68,453	\$ 50,690	\$ .74	9,133
TOTAL	3 A	191,952	\$ 145,141	\$ .74	25,610
NICK	3 A	73,907	\$ 127,750	\$ 1.73	9,860
MIKE	3 A	101,281	\$ 101,917	\$ 1.00	13,513
LEI	3 A	43,806	\$ 23,575	\$ .54	5,844
LEI	3 A	65,128	\$ 73,500	\$ 1.12	8,689
LEI	3 A	198,554	\$ 210,325	\$ 1.06	26,491
LEI	3 A	110,995	\$ 187,500	\$ 1.69	14,809
LEI	3 A	37,674	\$ 64,935	\$ 1.72	5,026
TOTAL	3 A	456,157	\$ 559,836	\$ 1.23	60,859
TOTAL	3 A	823,297	\$ 934,643	\$ 1.14	109,842 LBS.

PETE IFQ ID # 574686071 PETER LONGRICH  
 NICK IFQ ID # 574686126 NICHOLAS LONGRICH  
 MIKE IFQ ID # 574686196 MICHAEL LONGRICH  
 LEI IFQ ID # 60,000 BRJU LONGRICH ENTERPRISES INC. (TIM LONGRICH)



**RECEIVED**

DEC - 1 1999

From: Philip S. Drage, Captain, F/V Coho Inc.  
To: Dear Governor Knowles,

N.P.F.M.C

I would like to express my alarm and dismay to the actions of ADF&G and NPFMC that would provide a fixed poundage allocation to the halibut charter fleet.

I have invested a large amount of money and historical effort (for qualifying poundage of IFQ's). My IFQ's are now worth more than my 71' trawler based out of Kodiak. My monetary investment in Q's is worth more than 95% of any individual halibut charter vessel's surveyed value!

My family and business rely on the commercial halibut fishery for a significant part of our annual income. It is usually the fishery that puts us into a profitable status for the year. It contributes a multiplier effect on the Kodiak economy. Each dollar that the halibut fishery generates is spent about 4 times in our economy - the trickle down effect. Not so with a charter type fishery.

I have invested heavily in the halibut fishery because of the stability promised by the government. Reducing the commercial harvest will reduce the value of my IFQ's and my vessel, making it difficult for me and many other fishermen to repay both boat and IFQ loans.

Commercial fishing is #2 for generating income in Alaska and the #1 employer of people in the state.

All commercial fishermen rely on a sustainable resource and realize there are fluctuations in harvest quota's. We accept it as such. All commercial fishermen, trawlers and longliners, have been responsible stewards of the halibut fishery and fished by the rules of IPHC since 1923. Removing the halibut charter harvest from abundance based management is very poor public policy. It gives the halibut sport fishery no incentive for conservation. At present they have no minimum size limit. They need to have 32" minimum size limit just like commercial fisheries.

State of Alaska's abundance based management is the best in the nation, if not the world. It would be unwise to abandon such a successful system at this time.

The allocative move by ADFG sport fish division to abandon the abundance based management system is ludicrous, and points to "special privileges" to a "special user group".

Don't fix something that isn't broke!

Please ask NPFMC to immediately drop consideration of the fixed poundage allocation. I believe the charter allocation should be set at 125% of 1995 harvest which was offered by the council in 1997.

Sincerely,  
Philip S. Drage

PO Box 645, Warrenton OR 97146

PO Box 2260, Kodiak AK 99615

RECEIVED

NOV 29 1999

NPFMC

I am writing to oppose the fixed poundage allocation to the halibut charter fleet.

I depend on the halibut fishery for 100% of my annual income.

Reducing the commercial harvest will lower the value of my IFA's, therefore decreasing my yearly income and limiting my ability to pay off loans and investments.

The fishery should be managed in accordance to abundance, not by allocation of a fixed amount. In suggesting allocation, I feel the ADF and G has acted inappropriately.

Sincerely,  
Ameriah Beam  
Ameriah Beam  
P.O. Box 1994, Sitka, AK  
99835

George and Patricia Levasseur  
1113 Ptarmigan Street  
P.O. Box 383  
Valdez, Alaska 99686

RECEIVED

NOV 29 1999

N.P.F.M.C

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

Dear Chairman Lauber

Patty and I have lived in Alaska since 1974. During these years we have both commercially fished and sport guided fishermen for halibut. We both own IFQ's in area 3A and both possess charter licenses for our business Patty Anne Charters.

Patty and I have invested about \$300,000 in the halibut fishery. The money received from commercial and sport fishing has gone to educate our children in college and help secure our retirement future. I wanted to let you know that Patty and I are opposed to the charter fixed poundage percentage allocation. As a party that does both commercial and sport guided functions, we feel that a fixed poundage percentage to the sport guided fishery is unfair to the commercial longline halibut fishermen.

Guided sport fishing is commercial fishing and should be bound by the same type formula as the longline fishery. If there are enough fish, then the rules can be relaxed. In times of declining stocks all user groups have to share in the loss. The Alaska Department of Fish and Game is supposed to be unbiased in management and represent the renewable harvest availability of the resource. The ADF&G sponsored option to grant the charter fleet a fixed allocation in pounds is wrong and should never have been sponsored by a state agency. Over the years fishery managers have not taken sides on allocation issues and should not have taken sides in this one. I request that you ask the North Pacific Fishery Management Council members to drop consideration of the fixed poundage issue.

We have over \$100,000 in outstanding loans for IFQ halibut shares. If the charter fixed poundage allocation goes into effect, it may be difficult for us to repay the debt owed. Did you know that 65% of the sport halibut catch is caught by non-Alaska residents?

Thanks for listening.

Sincerely,

*George Levasseur*

Juneau Charter Boat Operators Association  
PO Box 34522  
Juneau, Alaska 99803  
Tel: (907) 789-0088 Fax: 789-2992

RECEIVED  
NOV 29 1999  
N.P.F.M.C

North Pacific Fishery Management Council  
Richard Lauber, Chair  
605 West 4<sup>th</sup>, # 306  
Anchorage, AK 99501-2252

Dear Chairman Lauber:

I am writing in opposition of the action by the North Pacific Fishery Management Council (NPFMC) which would place a harvest guideline (GHL) cap on the harvest of guided sport anglers.

The Juneau Charter Boat Operators Association (JCBOA) has 40 active members which represent the some 60 operating charter boats in the Juneau area. You have probably already received a series of letters from our members concerning the above issue. Their main points are as follows:

- The NPFMC has no representation from recreational fishing whether guided or non-guided.
- A GHL limit should not be considered unless or until the total recreational harvest is at least equal to or exceeds the bycatch and wastage of the commercial fleet.
- Recreational fishing has had a limit of two halibut per person per day for the past 25 years. There has not been an increase even though by "abundance-based-management" there should be an eight halibut per day limit -- matching the 400% increase in commercial harvest over the same 25 years. Consequently, there should be no decrease in the 2 halibut limit even though the commercial fishery might need to decrease their catch.
- Local area management plans can be instituted to address local issues and problems. These plans need to be developed using input from ALL user groups of the resource.

An area not addressed is that of a moratorium on guided halibut sportfishing. If a GHL cap were implemented then I would be willing to discuss a moratorium on the number of operating charter boats.

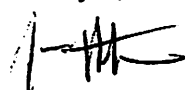
One consideration which has not been included in the documents made available to me is a substantial investment by an operator to enter the guided charter industry. There has not been notification of a pending or possible moratorium and, as such, some individuals have entered the business in just the past few years. Several years ago there was a notification given by the International Pacific Halibut Commission that a moratorium might occur and that if a person did not have a license at that time they might not be considered. Since then the licenses have not been used and there is no such notification when one receives the state logbook. There is also no notification when registering with the state for the vessel, as a charter business, or as a guide. It is only by word-of-mouth, often after the fact, that a new operator learns of your pending action.

If there is no GHL cap, then there is no need to discuss a moratorium. There is no need for a GHL cap. When I look at the very low number of halibut caught by guided and by non-guided anglers in the Juneau area I wonder why this issue is even being discussed. I also wonder why individuals with no understanding or interest in my business (guided sportfishing) are making major decisions which affect my business.

I urge you make no decision at this time. Let the two year old logbook program work for a few more years so that a decision based on facts can be made.

I also urge you to wait until there are representatives from recreational fishing, guided and non-guided, are on the NPFMC.

Thank you,



Jim Preston  
President

**From:** Greg Beam <GregBeam@worldnet.att.net>

**Date:** Monday, November 22, 1999 1:11 PM

RECEIVED  
NOV 29 1999

N.P.F.M.C

I am writing my opposition of a fixed poundage allocation to the alaska charter fleet.

I have a significant investment in the halibut fishery economically, historically, and as a steward of the resource. A renewable, well managed, sustainable yield, viable economic and biologically perfect resource working in harmonic perfection. Its as perfect as it gets as far as GREEN goes. Green is often misused these days but here, it is not.

I am highly dissappointed that our appointed or elected officials could be so reckless with such delicate resource stewardship.

I am rather disgusted that an important way of life in one of the finer frontiers on the planet is being compromised with willfull abandonment and that a few thrill seeking resource abusers with out of state dollars are being entertained with the destruction of our previously well managed halibut fishery.

Ask yourself, What kind of Alaska do we want? Who is important to Alaska? Who is Alaska important to? Should the resources in Alaska be managed with more care than those states who have destroyed thiers? Should we give in to the whims of outside interest and trade a few flashy dollars for a communities resource destructive demise?

I look at these questions and thier obvious answers and wonder what kind of fear or greed is clouding the decision makers on this issue. who is holding you hostage and for what, money, prestige, votes?

I dont know the answer for sure maybe its a combination of things but the bottom line is something is wrong and the wholesale sellout of Alaska as a way of life, a lifestyle, an example of natural beauty is being destroyed at the hands of those who come up here to see it by those who have come here to exploit it at the expense of those who have cared for and nurtured it, the people of Alaska, the people of the Alaskan economy, the people of the Alaskan comunity, the voters the tax payers, the Alaskans.

Its not rocket science to understand the management failures of 49 other states who have compromised community lifestyles for short lived prosperity enjoyed by a few plundering opportunists. You need not look far to see how communities are changed forever, thier fragile resources gone wasted, thier ways of life nothing but memories in the old folks home.

Alakans cannot be happy with this, we may not always agree 100% but we share a vision, an ideal that we are different as a community, that we are proud of what we are stewards of, that we will mange as needed and only then take and give as we can. We will not support leaders who act contrary to those beliefs. We will not compromise our resources and way of life with inapropriate stewardship and outside interst. Our leaders have a responsibility to the good of Alaska, the Alaskan way of life, and the value of life in our communities. This should be foremost in thier decisions and actions. We must insist upon your appropriate actions now!

*Gregory J. Beam*

11/22/99



RECEIVED  
NOV 28 1999

N.P.F.M.C  
11/23/99

Honorable Rick Lauber  
Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave, Ste 306  
Anchorage, AK 99501-2252


Dear Chairman Lauber,

I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charter boats in 1997. Adopting a charter boat allocation based on the other options under consideration will hurt consumer access to halibut and local businesses that serve commercial fishermen.

I operate a business, which provides supplies and services to commercial fishermen in Juneau. Without a steady supply of halibut, many of my customers will not be able to use my services and this will hurt our local economy.

In making your decision, I urge you to give fair consideration to local marine businesses.

Sincerely,



Mike J. Erickson  
Alaska Glacier Seafood Company

cc: Governor Tony Knowles  
Lieutenant Governor Fran Ulmer  
Senator Ted Stevens  
Senator Frank Mursowski  
Representative Don Young  
Deputy Commissioner David Benton

November 26, 1999

RECEIVED  
NOV 29 1999  
N.P.F.M.C.

Honorable Rick Lauber  
Chairman North Pacific Halibut Commission  
605 West 4<sup>th</sup> Ave., Ste 306  
Anchorage, Alaska 99501-2252

Dear Mr. Lauber;

We are writing to oppose actions by ADF & G and the North Pacific Fishery Management Council that would provide a fixed poundage allocation to the halibut charter fleet.

Our family depend on the commercial halibut fishery for 50 % of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily, over a quarter of a million dollars (\$250,000.00), because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and our boat. It will also impair the ability of people to repay both boat and IFQ loans.

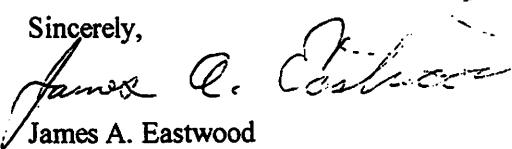
All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Separating the halibut charter harvest from abundance based management is poor public policy, and gives the charter operators no incentive for conservation, as well as, undermines the State's credibility. Abundance based management has been a corner stone of a successful management program and it is not wise to abandon it.

Recent allocation advocacy by ADF & G Sport Fish Division is contrary to state policy. The Sport fish division should stick to its job of management and leave allocation to the proper organizations.

Please ask the North Pacific Management Council to immediately drop consideration of the "fixed poundage allocation" since this option runs counter to fundamental management philosophy. The charter allocation should be set at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in my positive ways.

Sincerely,



James A. Eastwood  
P.O. Box 1185  
Petersburg, Alaska 99833



Gayle M. Eastwood  
P.O. Box 1185  
Petersburg, Alaska 99833

cc: Governor Tony Knowles  
Mr. Joe Kyle  
Senator Ted Stevens  
Lt. Governor Fran Ulmer

Senator Frank Murkowski  
Mr. David Benton  
Representative Don Young



Hallco, Inc.

RECEIVED  
NOV 29 1999

N.P.F.M.C

Post Office Box 1479  
Minden, Nevada 89423  
(775) 782-5174  
(775) 782-5189 (fax)

November 18, 1999

Richard Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup>, #306  
Anchorage, Alaska 99501-2252

Dear Mr. Lauber:

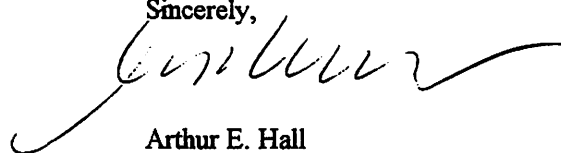
As the owner of a charter vessel based in Ketchikan and a contributor to the Alaskan economy, I am greatly concerned over the upcoming alternatives before the NPFMC addressing the sport halibut and guided sport halibut issue. It is clear the action alternatives before the board were refined without significant input from the sport fishing industry. The fact that now the decision can be made by a council without representation by any sport fishing interest is not in the best interests of the fishery or the Alaskan economy. I can't think of any board or council that could potentially devastate a healthy, viable industry without representation from that industry. The fact that this industry is based on a public resource makes this process even more disturbing.

I respectfully request that the NPFMC take the "no action" alternative to this issue in it's December 6 meeting. This should not be brought to the table until this council has proportionate representation! They must also take an OBJECTIVE viewpoint on matters of this nature.

These action proposals come at a time when stocks are healthy and increasing. How can one not realize that greed and dissent of another user group have motivated the commercial harvesters of this PUBLIC resource to use this "loaded" council to facilitate their greed?

I think NPFMC must look at the Sitka Sound commercial harvest restrictions with real scrutiny. These restrictions came from a community that is the quintessential halibut longline port. Sitka residents also realize the major positive impacts of sport fishing as well as subsistence and have made moves to embrace both sport and commercial. It would be very short sighted for a responsible council to squelch the sport fishing industry - especially with the political and economic climate that surrounds this issue.

Sincerely,



Arthur E. Hall  
President

cc: Senator Frank Murkowski, Senator Ted Stevens, Rep. Don Young, Gov. Tony Knowles, Comm. Frank Rue, Asst. Secretary Terry Garcia, Director Penny Dalton, and Council members: Austin, Benton, Bundy, Mace, Samuelson, Fluharty, Kyle, Pennoyer.

Honorable Rick Lauber, Chair, NPFMC  
605 West 4th Ave, Ste 306  
Anchorage, AK 99501-2252

RECEIVED

NOV 23 1999

RE: Allocation of Halibut

11-24-99

N.P.F.M.C

Dear Governor Knowles and Honorable Rick Lauber:

The purpose of this letter is to persuade the administration for the State of Alaska and the North Pacific Fishery Management Council to consider adopting a fair, equitable, and positive position regarding the allocation of halibut catch in Alaska waters.

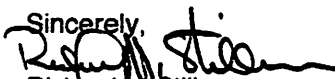
At present I am a commercial halibut fisherman. I have **purchased** my permit and receive quota shares (poundage) each year relative to the overall catch limit that is allowed for my area which is 2C. In years past I have been a charter boat captain and troller, so I am familiar with those industries as well.

I firmly believe that it is appropriate, fair and equitable that **1995** be considered as a base year for the allocation of halibut for the charter industry as opposed to 1997 or 1998. Also, the charter fleet should not have a "fixed poundage" when the rest of the industry utilizes a formula for poundage based upon resource management principles.

In defense of my position please consider the following:

1. The impact of the **commercial** charter industry has grown rapidly over the past few years. Their ability to harvest a resource in an effective and efficient manner is reflected in their catch statistics for salmon, halibut and other attractive species. They do deserve to have a share of the halibut quota, but most certainly **not** at a level that is financially detrimental to other participants in the industry. If individuals in the charter industry wish to have a quota share that exceeds their share of the **1995 catch limit**, then I would propose that Alaska and the charter industry lobby for regulations that would enable charter fisherman to **buy** into a set limit of shares when they are being sold by other halibut fisherman. This is just the same as I would have to do if I opt to increase my catch/market share.
2. Following years of charter experience and general observation I believe that Alaskans are making a mistake allowing high catch limits for their fish on the part of out of state residents. It is not unusual for a charter client to expect high catch rate (poundage) in order to offset, or justify the expense of the trip. I firmly believe that Alaska should be marketing the **quality** of the trip rather than the **quantity** (poundage) of the trip. Then, the charter industry would not be in need of the quantities of fish that they are so aggressively seeking and the pressure would be reduced in times of a lower biomass of halibut. It is time to change our marketing approach and the daily bag and possession limits.
3. I believe it is **highly inappropriate** that ADF&G should be presenting position statements relative to a allocation issues between user groups. Even if their position were favorable toward the commercial halibut fisherman, I would still believe their function is and should continue to be limited to the management of the resources under their charge...period. Their position relative to allocation should be disregarded.

Sincerely,



Richard M. Stillman  
501 Front St.  
Ketchikan, AK 99901



Tom Gemmel  
Halibut Coalition  
211 4<sup>th</sup> St. Suite 110  
Juneau, AK 99801-1143

JUNEAU, ALASKA

November 24, 1999

Dear Tom,

As concerned commercial buyers and processors of Alaskan Halibut, we are writing regarding how this valuable resource is distributed and allocated among all user groups.

There is currently a strong push within the State among Sport Charter operators to obtain a fixed amount of Halibut catch for its particular use. This fixed amount of a harvest quota runs contrary to common sense to all of us in the industry who have operated under the theory of abundance based management and harvest for 100 years in the Halibut industry.

Natures' stocks are cyclical for a variety of reasons. No user group should be exempt from abundance based harvesting. Commercial fishermen and processors have benefited and suffered from wide swings in the annual quota of halibut to be harvested. The quota is based on the overall health of the resource. We are certain that it is not wise to exclude any group from harvest fluctuations and would set a disturbing precedent in the way we view this resource.

We feel that a guideline harvest level must be established for all user groups. The Sport Charter industry is, of course, a commercial harvesting business and it needs to comply with harvest data reporting requirements (logbooks). All of us on the commercial side of this resource have harvest limitations set upon us by management. There should be no exceptions.

There is a high level of paperwork and reporting that is currently required of all fishermen and all processors who work with halibut. There is also a serious tax levied against all halibut landings. We feel that all groups should share in the cost of administering and managing this fishery and that sport charter groups should pay for the right to catch this resource as well.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Sandro Lane".

Sandro Lane  
President  
Taku Fisheries/Smokeries

A handwritten signature in cursive script, appearing to read "Eric R. Norman".

Eric R. Norman  
General Manager  
Taku Fisheries/Smokeries

Homer, Alaska  
Nov. 3, 1999

Thomas M. Gemmell  
Interim Exec. Director  
Halibut Coalition  
PO Box 22073  
Juneau, AK 99802-2073

NOV 29 1999

NPFMC

Dear Mr Gemmell,

My son + I are IFQ owners.

Concerning allocation of halibut  
to the guided charter commercial  
industry, the State's goal of  
using abundance-based management  
for all commercial users must  
not be changed or deviated from.

"WEBSTER'S" dictionary definition of commercial  
is: = made or done primarily for sale or  
profit.

Sincerely,  
James Preston



James Preston  
P.O. Box 394  
Homer, AK 99603-0394

cc: Gov Tony Knowles  
Rick Lamber  
Joe Kyle

David Benton, ADF+G

Rep Don Young, Sen Frank Murkowski, Sen Ted Stevens

Halibut Coalition PO Box 22073 Juneau, AK 99802-2073

Dear Sirs,

I remain absolutely stunned that Sport Fishermen are allowed to take Juvenile Halibut of less than 32 inches in length (Minimum size limit) For commercial use and have so informed the International Halibut fishery several years ago. Their reply is that allowing the Sport Charter Fishery to take their limit daily is much better than releasing undersized Juvenile Halibut to catch larger sized Halibut? Which of course is exactly what Commercial Fishermen must do always?? Even the Charter Sport Fishery must comply with a 28 inch minimum on Kingsalmon? Why not a 32inch minimum length on Halibut as enforced on Commercial Halibut Fishermen and rightly so as less than 32 inch minimum length is not even a feasible foodfish? I remain completely stunned as yet at an enforcement issue on only one group of Halibut Fishermen? Sincerely

*Jack O'Donnell*

Jack O'Donnell "PTARMIGAN"  
Box 394  
Petersburg AK  
( A HALIBUT FISHERMAN SINCE 1938'!

1 November 1999

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NOV 29 1999

N.P.F.M.C.

Friday, September 17, 1999  
F/V Sierra Mar  
C/O Wards Cove  
Ketchikan, AK

RECEIVED

NOV 28 1999

N.P.F.M.C.

Dear, N.P.F.M.C.

I am an Alaskan longliner who bought back into Area 2-C and 3-A Halibut IFQ fishery after being eliminated from it 1995 by the IFQ program. I had been crewing since 1972. The quota shares I now own; the investment I have made; and my boat and career were bought in good faith – fair and square – with hard work, personal sacrifice and after-tax dollars.

I can't tell you the level of distress I am feeling to think the ADFG is sponsoring an option to grant the Guided Charter Industry a fixed allocation of the halibut resource. What is the Guided Charter Industry if not just another form of commercial fishing? The ADFG should not be in the allocation business or an advocate for any particular group. **Their business and mandate is biology and management.**

The only fair system is to limit the Guided Charter Industry to the 1995 levels of their catch. If an individual wants to harvest more halibut, they can buy quota on the open market – just like everybody else who lost their jobs and investments back in 1995. This market system is in place now so they can buy back in.

To take quota from myself, and the many others like me, and give it to another type of commercial fishing group who have little or no fishing history and a 96% out-of-state clientele is morally, ethically and politically WRONG.

Please consider the points I have made and this situation carefully. Our great country depends on protecting the rights of property and the rights of the individual. Please do the right thing and maintain the Halibut allocation as it was legally enacted in 1995.

Sincerely,



Kevin Seabeck

To the Northpacific Fisheries Management Council,

I AM writing to oppose any fixed poundage allocation to the halibut charter fleet.

To ask for a set allocation based on a historical best year and then some is unbelievable, unjust, unsustainable and counter to the sound policy of abundance based management.

The charter halibut fleet has had unrestricted growth in the last 10 years much the same as the longline fleet prior to I.F.Q's. I would suggest a guideline harvest level based on future abundance and an average of the last 7-10 years harvest level.

When the I.F.Q fishery started I know of new entrants to the fishery who recieved no Quota Shares. I myself only qualified for 3 years, hereby receiving less fish than our historical 5 year average.

My family and I depend on the commercial halibut fishery for 30-40% of our annual gross income. If stocks decrease and the charter fishery is allocated a high fixed level, our net income would be severely decreased. Commercial Fishing is 100% of our income. It is not a sport for us or many others through out Alaska's coastal communities. Thank you for your consideration.

Sincerely,

Ken Bue  
Cheryl Pritchard  
F/U Chandy  
Sitka. - AK.

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NOV 28 1999

N.P.F.M.C

**RECEIVED**

November 29, 1999

NOV 29 1999

To: North Pacific Fisheries Management Council  
Chairman Richard Lauber

**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 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 GHIL approved over a year ago. We urge you to base the halibut charter allocation on a percentage of the total quota. We should all share the pain and share the gain as the halibut quotas go down or up.

We also feel that the ADF&G Sport Division should not advocate guided sport over commercial use. It is not right that ADF&G feels that the-guided sport sector deserves a harvest priority over all other users. It is not right that ADF&G is proposing a fixed allocation that is inconsistent with Alaska's policy in all other fisheries. ADF&G Sport Division's proposal is politically incorrect and discriminating against the commercial longline fleet!

Most commercial fishermen have supported conservation, accepting low quotas when the biomass was low. The guided sport industry needs to be treated as a commercial industry and abide by the same rules.

We urge the council to implement effective slow down measures, for example, reducing bag limits and use of halibut stamps (like the stamps being used in the Southeast Alaska non-resident guided sport King salmon fishery). Perhaps the guided sport sector and State of Alaska need to look into moratorium and limited entry. Also, in the future, an option for the guided sport industry could be to purchase IFQs from the Commercial fleet. There are a number of options to work with.

Sincerely, *Marty L. Remund*  
*Jean A. Remund*

Marty & Jean Remund, P.O. Box 8147, Port Alexander, Alaska 99836

cc: Governor Tony Knowles





PO Box 389 Yakutat, Alaska 99689 (907)784-3671 Fax (907)784-3670

November 26, 1999

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NOV 30 1999

N.P.F.M.C

Honorable Rick Lauber  
Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave, Ste 306  
Anchorage, AK 99501-2252

Dear Chairman Lauber,

I am writing to urge you to stay with the original guideline harvest level that was set for halibut charter boats in 1997. Adopting a charter boat allocation based on the other options under consideration would be devastating for my fish processing plant as well as every other fish processing plant in the state of Alaska.

Under the current system Yakutat received over 1.3 million pounds of halibut which accounted for 2.31% of the total halibut caught. If the Alaska Department of Fish and Game, Sportfish Divisions proposal of a Fixed allocation equal to 125% of the 1998 landings were to be implemented, Yakutat would lose not only the reduced IFQ catch but an additional 25% of that catch that would go to sportfish interest during years of low abundance. I feel that it is important that all segments of the fishing industry bear the burden of good and bad times and that everyone's allocation is based on abundance. No sector should be immune to conservation.

In making your decision, I implore you to give fair consideration to all of the segments, (commercial, sport and subsistence) that make up this great states Halibut fishery. It is imperative to the survival of small, isolated plants like YKI Fisheries that the Halibut quota is abundance based, and not a fixed allocation for "some" of the user. Thank you for your time.

Greg Indreland  
Plant Manager  
YKI Fisheries

Serving Yakutat & Gulf Of Alaska  
Fishermen

**RECEIVED**

DEC - 1 1999

November 30th

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

Mr. Rick Lauber, Chairman  
NPFMC

Dear Mr. Lauber:

The idea of a fixed halibut poundage has absolutely no merit and urge you not to support this proposal.

During the years that I have been involved in the halibut fishery we have always managed to adapt to annual quota fluctuations. Other groups can do the same.

A fixed percentage of the annual quota is the only way to conduct the halibut charter fishery, based on 125% of the 1995 guided sports catch, and many of them agree that this is reasonable. I would hope that you will give this matter very serious consideration.

Sincerely,

*Ed Fugl Vog*  
Ed Fugl Vog

The Honorable Rick Lamber, ... 12-1-99

I am opposed to the present proposal by  
ADF+G Sport Fish Division asking for  
25% of the halibut quota in areas 2C and  
3A.

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DEC - 1 1999

N.P.F.M.C

Respectfully  
Michael Kempnich  
PO Box 119  
Craig, AK  
99921

# Sitka Tribe of Alaska

Tribal Government of Sitka, Alaska



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DEC - 1 1999

N.P.F.M.C

## Sitka Tribe of Alaska Position Letter on Halibut Allocation

To: North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Ste 306  
Anchorage, Alaska 99501-2252

November 30, 1999

Re: 125% Halibut Allocation to Charter Industry

Dear Council Members,

The Sitka Tribe of Alaska enjoys a Government to Government relationship with the U.S. Federal Government and its various agencies. So we would like to state that we are strongly opposed to the allocations currently under consideration to the charter fleet and our reasoning will follow in a subsequent document. This new user group should be allocated no more than an average of their catch over the past five years. With the recent allocation request by the Department of Fish and Game to allocate 125% of the 1998 charter halibut sport quota to the charter industry, the Tribe is concerned that the implications to its' citizens that rely on this resource will be severe. The lack of communication and responsiveness from the NPFMC is troubling when dealing with native concerns.

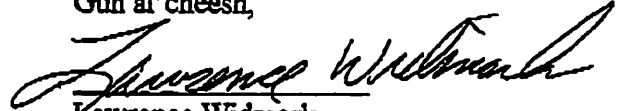
The Tlingit and other coastal Indians of southeast Alaska have utilized halibut in many forms for millenia to the extent that the halibut hook was invented and there are halibut crests that adorn clanhouses and totem poles alike. Chaatl' Hit is the name of the Halibut house. A long connection between the peoples of the Pacific Northwest and the sea embodies their Customary and Traditional gathering lifestyles.

Sitka Sound is already experiencing a depletion in halibut abundance. So much so that local user groups assembled to draft up a plan to reduce the impact that commercial fishing and the charter industry are having on local stocks. This local management plan is a unique management style being copied by other communities around coastal Alaska. The impacts that Individual Fishing Quotas and the mushrooming Charter industry are having on the halibut resource are being and will continue to be realized.

The Sitka Tribe vigorously opposes the Alaska Department of Fish and Game request for a fixed allocation of the halibut resource for the guided charter fleet, which is already fully exploited, and does not fluctuate directly with abundance. The whole idea flies in the face of proper resource management and equal participation in conservation and concensus by the other user groups. A new commercial fishery should not receive precedence, with Fish and Game support, over historical users such as the commercial longliners, resident sport and Customary and Traditional user groups.

We hope you take our comments with the weight of a community that has a long history of halibut use and concern over its continued availability to our citizens. This issue bears a long deliberation about what exactly the outcome should be in regards to whose piece of this resource "pie" should be bigger.

Gun al'cheesh,



Lawrence Widmark  
Tribal Chairman

- cc: Senator Murkowski
- Senator Stevens
- Congressman Young
- Governor Knowles
- Alaska Department of Fish and Game
- Commissioner Frank Rue
- Halibut Coalition



# Sitka Tribe of Alaska

Tribal Government of Sitka, Alaska

The Sitka Tribe has these points to make about the proposed allocation and the difficulties already being experienced by those living with the charter industry.

- \* The halibut resource is already being fully exploited by groups with precedence and historical leverage. The longline and resident user groups are already stressed to find sufficient amounts of halibut for local industry and local use. The Sitka Tribe believes that there should be **NO** allocations away from existing fisheries.
- \* Allocations and Quotas should be based on abundance and not on political favoritism. The interest and conservation of the resource should take precedence over use, and precedented fisheries should have the priority.
- \* 97 percent of the halibut charter clientele is from outside the state of Alaska and many residents are feeling that Alaska is becoming the "colonial" playground for the rest of the nation. Promoting an exorbitant allocation to guided commercial charter interests only promotes this alienation.
- \* The attitude of many clients and guided charters is product quantity oriented (how many fish can we catch and keep) and in reality it should be experience quality oriented (we're fishing in Alaska!).
- \* The creel census is laughable as there is no way regulating agencies are accounting for the majority of the landings. It is mostly conjecture and best guess.
- \* Increased charter effort is causing conflict on the grounds where guided charter boats anchor in the middle of known commercial "drags". According to the law, commercial vessels have the right of way.
- \* Law enforcement often targets local resident boats often assuming that nearby charter boats must be on the "up and up".
- \* We live and vote here! The charter industry is seasonal and often nonresident during the winter months when resident Alaskans are perousing their freezers for halibut to eat that is increasingly not there.
- \* Charter boats that have a sixpack license are fishing in offshore waters in search of halibut and other species greater than three miles in violation of Coast Guard regulations requiring them to have an offshore certificate, an EPIRB, and in violation of their insurance policies that they must remain in nearshore waters. It will take a

catastrophe or two, where clients are injured and charter guides are sued for negligence before this is enforced.

- \* The introduction of the charter industry has brought about a very noticeable decline in the local halibut stocks. Many residents are complaining about the total lack of halibut in well known and secret "honeyholes". An allocation of this magnitude will only exacerbate this problem.

The Tribe realizes that there are very ethical charter operators in Alaska. Unfortunately, the bad apples of the group get most of the attention and it is often negative at that. It is felt by many that the charter industry is unregulated and some charter operators are allowed to make up their own rules, and they figure out ways to please the client and not follow the laws others have to follow, or the rights of their respective co-users of the resource.

The Tribe has some suggestions to put forth to the charter industry to try and alleviate some of the conflicts.

- \* Lower daily bag limit to one halibut for non-residents. Non-residents get two halibut tags per year. Once filled, catch and release.
- \* Buy IFQ's from commercial fishermen.
- \* Law enforcement that actually monitors the compliance of the charter industry instead of assuming that they must be doing so because they have a charter license.
- \* Floating and remote lodges get inspected on a regular basis. Public knowledge of their freezer capacity.
- \* Reduce non-resident possession limit; define possession limit to be fish in possession in any form until you return to your place of permanent out of state residence.
- \* An upper and lower size limit. 32 inches to protect juvenile stock, and release of 100+ pound fish to protect spawners.
- \* Instead of highest catch of the best year, average the last five years and allocate 100% of the average.
- \* Halibut are to be filleted only in port and not on the grounds. Commercial guys can't do it.
- \* Recognize the guided sport industry for what it is, a lucrative commercial industry and regulate it as such.

P.O. Box 39309  
Ninilchik, AK 99639  
November 28, 1999

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

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

Dear Sir,

Below is a copy of a letter that I sent to Gov. Tony Knowles expressing my views concerning the idea of a fixed poundage of halibut being allotted to the guided sports charter industry.

I have Individual Fishing Quotas (IFQs) for halibut in 3A (Cook Inlet-Seward area) both purchased and awarded on fishing history. With all the controversy over Cook Inlet Salmon, I sold my Cook Inlet Salmon Permit in 1996 and invested in halibut IFQs in order to help stabilize my fishing income. This was based on the IFQ program which was implemented in 1995 with a guideline harvest program that was divided at that time on a fixed percentage of allocation between commercial and sport harvest.

My feelings are that in times of abundance and in times of scarcity, that all user groups would all share at the same percentage using the tenets of Pacific fishing treaties. An example is The Pacific Salmon Treaty negotiated with Canada based on the abundance management system. Can't that concept be used here?

I take issue to your statement that commercial fishermen can adapt easier to reduced harvest levels than the charter industry. We have to make our payments, meet our expenses, and have enough to provide a living for our families just as the charter industry people.

A lot of money has been borrowed by the commercial fishing industry and lent by private, State of Alaska, and federal lending institutions for a stable economic environment that will benefit the state. With the changes proposed by your office and the State Dept. of Fish and Game, Sport Fish Division, this will cause economic hardship for the commercial fishing industry. What is



your reasoning for proposing the changes from the 1995 status? How do you propose that the commercial fishing industry repay these loans on shrinking percentages of quota? Why is the State of Alaska involved with allocation issues?

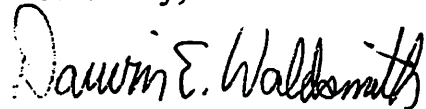
These are some of the questions posed by the concept of giving a fixed poundage to the charter industry. Everyone involved in the fishery has been working under the original concept of the IFQ program implemented in 1995 which was based on fixed percentages of the halibut resources allotted to user groups. The commercial fishing fleet which uses the 1995 IFQ concept has not been allowed to grow one iota. Meanwhile, the charter industry fleet has grown at an exceptional rate even beyond expectations. Why should the commercial fleet subsidize this growth?

Other groups of people will suffer under a fixed poundage concept. Both the subsistence and recreational sport fisherman will be in competition with the charter industry to find fish. In the areas close to large charter fleets, the fish resources will be overtaxed because the charters will be able to keep fishing until their quota is caught. Their efforts are in a small area and will be in competition with the sport and subsistence user groups.

I urge to reconsider the concept of fixed poundage and instead promote the idea of a fixed percentage of quota as it was proposed in 1995.

Thank you for taking time to read my thoughts on this matter.

Yours truly,



Darwin E. Waldsmith

907-271-2817

Nov. 30, 1999

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DEC - 1 1999

N.P.F.M.C

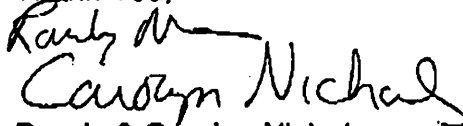
To: NPFMC

I am for an abundance based management program for the guided sport fleet. I have watched the guided sport fishing industry grow very quickly and feel that with the longline fleet under the restrictions of the IFQ management program that it is odd that you would allow another commercial sector to grow unchecked at the longline, non-guided sport, and subsistence fleets expense. It seems too me that the guided charter fleet should have an allocation based on abundance just like all other fisheries in Alaska.

My family longlines for halibut under the IFQ program. We fished for many years under the previous management system as well. I feel that if resource based cuts need to be made that all user groups should bear the burden of conservation. I hear Governor Knowles say that the guided sport industry cannot adjust to quota changes as easily as the longline fleet. This idea seems pretty odd in that both our crew and ourselves depend on these jobs to feed our families and pay our bills. We live and work in Alaska and I do not see how the guided charter operators have any needs that are more special than the continued welfare of our families.

I definitely would like to see the Council adopt the Guideline Harvest Level previously passed. The state harvest data and the charter logbook program both show a DOUBLING of catch from 1997 to 1998 in area 2C. I feel that this growth allowed to continue unchecked is discrimination against all other user groups of the halibut resource.

Thank You,



Randy & Carolyn Nichols  
305 Islander Drive  
Sitka, AK 99835

November 18, 1999

Chairman Richard Lauber  
North Pacific Fishery Management Council  
605 W. 4th Ave.  
Suite #306  
Anchorage, Alaska 99501-2252

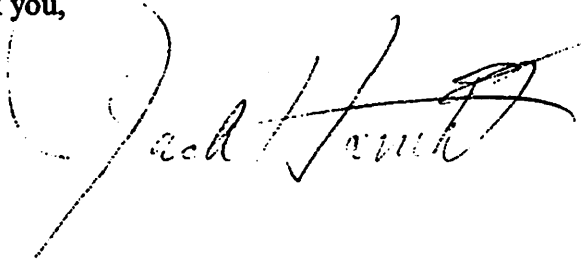
Dear Chairman Lauber,

I am writing to you as an Alaskan resident and commercial fisherman. I am totally opposed to the halibut sport-charter industry getting a fixed poundage allocation. Let them figure out a solution within the existing 1997 agreement. If the charter fleet feels this allocation is insufficient, let them buy quota as the vast majority of the commercial fleet has done.

Both charter and commercial users access a public resource for economic gain. Both user groups serve the public. Many forget "the public" is not only subsistence, sport, and those aboard a charter, but also includes those people patronizing restaurants and grocery stores the commercial fleet supplies. The charter industry has had several years to prepare a solution to the problem many have seen coming. Their three point solution? 1) Stall 2) Take from someone else 3) Don't share in conservation.

Meanwhile, the commercial fleet has bought into a program the Council approved and the State has promoted. Contrary to popular belief, most of us were not made wealthy by a large windfall, but have mortgaged homes, boats, and property to buy into the IFQ program. The IFQ program cut commercial longline numbers by almost half. Initially, nobody got to catch what they were accustomed to catching. To be viable we had to buy in or get out. Fine, those of us that remain have accepted these painful and costly transitions. The charter business needs to make some tough decisions now also. I hope both yourself and the other Council members remember these points as you try to resolve the charters' problem.

Thank you,



Jack Hank  
4002 KACHANAKUMY  
HARR, ALASKA 99603

**RECEIVED**

DEC - 1 1999

**N.P.F.M.C**NPFMC  
Richard Lauber, ChairmanDavid R. Martin  
71605 Sterling Hwy.  
Clam Gulch, Alaska 99568  
Nov. 30, 1999

Dear Board Members,

I am strongly opposed to any action by ADFG, Sportfish Division, and the North Pacific Fishery Management Council that would give a fixed poundage allocation to the halibut charter fleet.

First off the ADFG, Sportfish Division has absolutely no business supporting, let alone drafting, halibut management plans and options that are strictly allocation. What is even worse in this case is that they are promoting a fixed allocation that is not even subject to abundance base management. Where is the responsible biological management in this? There is none! It is both unprecedented and inappropriate for the Sport Fish Division to be an advocate on allocation issues. Their job is to biologically manage the States fisheries using the best scientific information available which definitely means abundance base management.

Everyone that fishes for halibut must also do their part as stewards of the resource and be managed on abundance base. What if the halibut charter fleet was not based on abundance base management? There would be a halibut harvest that would hammer the near shore and localized halibut stocks. This would create localized and near shore stock depletions. Who would suffer? The halibut sports fisherman, subsistence fisherman, the small boat commercial fisherman, the charter industry, the local economies and most importantly the local halibut stocks would be fished out. This is no way to manage a fishery. When the stocks are abundant then everyone catches more. When the stocks have declined then everyone catches less. This is the only way to professionally manage the fishery on a sustained level.

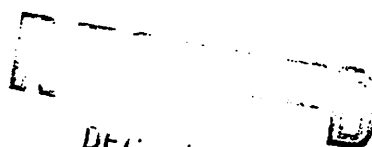
The charter allocation should be set at 125% of the 1995 harvest because this was a very generous compromise by the council in 1997 the allowed reasonable growth. Just like the commercial industry knew the qualifying years for IFQ was 1985 to 1990 the charter industry knew the set year for their catch percentage was 1995. To change either now would not be professional or fair.

My family has invested heavily into IFQs. We did this because the IFQ program gave stability to the fishery and the government promised this stability. Reducing the commercial harvest will brake this promise and reduce the value of IFQs and vessels. It will also cause some fishermen to go broke and make for financial hardships on others to repay their boat and IFQ loans. This is neither right nor fair.

Commercial halibut fishing provides many jobs for the local communities and greatly benefits the state. Thank you for your time, consideration and professionalism.

Sincerely,

  
David R. Martin



DEC - 1 1999

N.P.F.M.C.

December 1, 1999

The Honorable Rick Lauber

Dear Sir:

I am a fifty year Alaskan resident with thirty five years of sport, commercial and subsistence fishing experience. I also am a licensed guide in the sport charter business, currently for Wood Hook Charters.

I would like to address the proposal by the ADF&G Sport Fish Division asking for 25% of the halibut quota in ares 2C and 3A.

The sport-subsistence sport-charter groups are now allowed to catch two halibut a day 335 days a year. In theory a person could catch 670 halibut, with no size restriction, per year. This is more than enough to satisfy any sport or subsistence need.

If the sport-charter group still feels it needs more fish perhaps they should be allowed to buy quota as other groups are allowed to do. The benefit of this approach would be that no-one would be hurt financially or forcefully displaced from a fishery.

This proposal is not based on need rather on greed and is not responsible.

Respectfully:

Mike Douville

P.O. Box 68

Craig, Alaska 99921

cc. Alaska Gov. Tony Knowles

fax: 907 465 3532

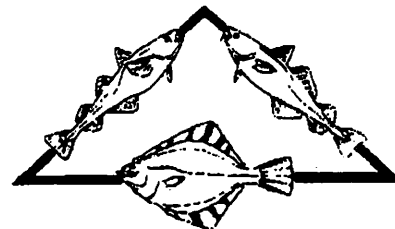
# Alaska Groundfish Data Bank

P.O. Box 2298 • Kodiak, Alaska 99615

TO: RICK LAUBER, CHAIRMAN  
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

RE: COMMENTS ON CHARTER VESSEL GHL

DATE: DECEMBER 1, 1999



## AGDB COMMENTS ON CHARTER VESSEL GUIDELINE HARVEST LEVEL (GHL)

### AGENDA ITEM C-3

Many members of Alaska Groundfish Data Bank (AGDB) own halibut IFQ's and/or use charter vessels for sport fishing. AGDB members hope restraining the halibut catch of charter vessels through a Guideline Harvest Level strengthens the charter industry.

AGDB's membership does, however, oppose setting any Guideline Harvest Level as a fixed tonnage level instead of a percentage historic share of the annual allowable catch. A percentage share assures that all users enjoy the benefits when the halibut biomass is large and preserves the diversity of users when the halibut biomass is low. To designate any one user group as more important than any other user group creates discord in communities. The loss of any user group effects the entire infrastructure of a community.

Thank you for considering our comments.

  
Chris Blackburn, Director  
Alaska Groundfish Data Bank

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N.P.F.M.C.

Folder: Inbox

Message 2 of 101 (OLD)



Date: Wed, 01 Dec 99 11:32AM AHST

From: Nkatel@aol.com [redacted]

To: halibutcoalition@usa.net

Subject: halibut IFQs  
[redacted]

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DEC - 1 1999  
M.P.F.M.C.

I am writing on behalf of all commercial fishermen, Native fishermen and myself, to protest the continuing loss of fishing rights in our communities. Like many coastal villages, the commercial fishing economic base of Ouzinkie, Alaska has been decimated by government regulations. On December 6, 1999, the ADF&G will hold a meeting in Anchorage to discuss further losses of halibut poundage allotted to commercial fishermen, to the advantage of the Sportsfish Division.

Ten years ago most families in the village supported themselves by fishing on small boats. Because the IFQ system favors big boats, the fishermen here were completely put out of business. Now most people in Ouzinkie are unemployed. This situation exists in all coastal (i.e. Native American) communities. By taking away our livelihood, the government has reduced independent, hard-working people to lives of poverty. We pay the cost of the overfishing of big boats, even though our small boats harvested fish in a more efficient, more ecologically harmonious way.

The efforts on the part of charter boat operators to increase their quotas at the expense of commercial fishermen will directly affect small boat fishermen. Those of us that are still able to support our families on the meagre IFQs allotted to us, will be put out of business.

It is virtually impossible for village residents to find or create new jobs and economic possibilities. Additional catch percentage being awarded to sportfishermen will advance the destruction of our way of life, and result in rural ghettos. The ultimate cost to Alaska in terms of tax dollars as well as ruined lives should be taken into account before giving our fish to visitors who come for a few months of the year. Please keep in mind that the financial and human costs involved include increased welfare payments, homelessness, alcoholism and foster care. Are the tourist dollars worth it?

Sincerely, Nick Katelnikoff  
owner/operator F/V Cape Horn,  
3A Halibut IFQ holder



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Message 5 of 101 (NEW)



Date: Wed, 01 Dec 99 09:54AM AHST

From: Dwight Downer <jddowner@juno.com>

To: ricklauber@aol.com, halibutcoalition@usa.net

Subject:

Dear Mr. Chairman,

My family and I are commercial fishermen who depend heavily on the 2c halibut resource for our income. We have over \$200,000 invested in the fishery and are very nervous as the Council debates a fixed allocation to the charter fleet. I believe that a fixed allocation for any user group in this fishery defys logic and goes against the grain of a (so far) very successful management program. I believe that a fixed allocation to the charter fleet (a relatively new user group) would gut the commercial fishery in 2c and 3a, destroying the values of IFQ shares and further eroding an already weak vessel market.

My family's income depends on the bit of stability that the IFQ program gave the fishery. Please don't destroy what so many worked so hard to achieve.

In case there is any doubt—I am ADAMANTLY opposed to a fixed allocation to any user group of the halibut fishery.

Sincerely,

J. Dwight Downer  
F/V Sea Miner  
Box 1045  
Haines, Ak 99827  
907-766-2053

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DEC - 1 1999  
N.P.F.M.C



19300 Villages Scenic Pkwy  
Anchorage, AK 99516

December 1, 1999

Rick Lauber, Chairman  
NPFMC  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

RECORDED

DEC - 1 1999

N.P.F.M.C

Dear Mr. Lauber,

Enclosed are my comments regarding the halibut charter GHL that is before the Council for initial review.

HALIBUT CHARTER GHL MANAGEMENT ALTERNATIVES FOR ANALYSIS

At this time, I'm unable to provide any specific comments on the proposed alternatives for halibut charter GHL management. Notwithstanding the excellent work usually done by NPFMC staff, the analysis of the alternatives posted on the NPFMC website is so confusing that the consequences of the different alternatives are unintelligible.

HALIBUT CHARTER GHL LEVEL

I support the original halibut charter fishery GHLs adopted by the Council in 1997, based on 125% of their 1995 catch, the highest ever recorded by the sport charter fleet. This GHL was both generous and appropriate since it allowed for continued growth of the charter fleets until agreeable management measures could be established. I also support the original intent of the Council not to close the sport charter fleet upon reaching the GHL, but to impose management measures the following year to bring the sport charter harvest within the GHL.

Any increase in the halibut charter GHL above the levels adopted by the Council in 1997 would have a significant impact on all IFQ holders who have invested in quota shares in Areas 2C and 3A, and would undermine the financial basis for those investments. An increase in the halibut charter GHL would also have a disproportionate impact on the hundreds of Alaskans who have invested in the halibut IFQ fisheries, as income from traditionally profitable fisheries such as salmon and herring has declined. According to the RAM Division's 1999 Report to the Fleet, at the end of 1998 about 600 Alaskans who were not originally issued halibut quota shares had invested in the fishery, and held about 5 million pounds of the total quota for that year. These individuals accounted for about 76% of all new entrants into the fishery.

Many Alaskans received loans from the State of Alaska to purchase their halibut quota shares. Obviously the Council is not responsible for the State of Alaska's fisheries policies. But I hope that Council members representing Alaska will consider the gross inconsistencies in reallocating halibut to the sport charter fleet, while the Department of Commerce and Economic Development provides loans to Alaska residents to purchase halibut quota shares. What is the rationale behind this kind of public policy decision?

There is also reason to be concerned that an increase in the halibut charter GHL above the levels adopted in 1997 could undermine the conservation incentives inherent in the halibut IFQ fishery as a "rights-based" fisheries management system. If IFQ holders come to believe that their quota can be easily reallocated, and that the fundamental economic principles of the IFQ system are at risk, the likelihood of overharvesting and highgrading could increase as fishermen try to make up for income lost in the reallocation of the resource.

FIXED HARVEST LEVELS

I oppose any management measures, including allocation ranges, which do not strictly adhere to an abundance-based approach to management. In an era of heightened public awareness about the state of the nation's living marine resources, it is unconscionable to abandon the conservation principles that have historically guided the Council's decisions. And it is particularly alarming to do so at a time when the halibut population is expected to decline.

It is also inconsistent for the State of Alaska to push the U.S. Section of the Pacific Salmon Commission to adopt abundance-based management as a basis for negotiating the Pacific Salmon Treaty, and then dismiss it as unnecessary with respect to halibut management. Note that on the ADF&G website an op-ed titled "Alaska's Salmon Management: A Success Story" specifically touts abundance-based management as a long term approach to rebuilding wild chinook stocks and maintaining them at healthy levels. The op-ed states that (with respect to chinook salmon) "For the first time on the Pacific coast, fixed quotas are replaced with an active program responsive to stock status and conservation needs".

Furthermore, there is absolutely no basis for the argument that "the guided halibut charter industry may not be able to adapt to sudden changes in harvest levels as easily as the commercial fleet", as Governor Knowles suggested in a letter to a Sitka resident. Keep in mind that a halibut charter operator can have a successful trip and satisfied clients without limiting out on halibut, if the weather is good, and there are other species to catch, and whales, seals, sea otters, and other marine life to see. The halibut charter fleet (and the Alaska sport charter fleet in general) has focused so singularly on marketing their abilities to produce fish for the freezer, that they have lost sight of some of the more traditional values the public places on sportfishing. In this regard, the sport charter fleet is able to adapt to changes in harvest levels far better than the commercial fleet.

If the Council adopts fixed halibut harvest levels for the sport charter fleet, perhaps the language justifying the action could read "For the first time on the Pacific coast, abundance-based management is replaced with fixed harvest levels that are responsive to the economic needs of a user group, regardless of stock status and conservation needs".

If the Council decides to provide a fixed harvest level to the sport charter fleet, based on the need for economic stability, will it also be more willing to accommodate these kinds of proposals from other user groups in other fisheries in the future?

I did not receive an initial allocation of halibut quota shares, but invested in the fishery four years ago to diversify my fishing business. The IFQ program has provided many fishermen like me the opportunity to develop a fishing business that is based on the demands of the market and the rational use of my time and resources. Longlining halibut is now my primary fishery, and accounts for over two thirds of my fishing income. I also gillnet salmon out of Cordova. Like myself, many other Cordova fishermen who are also anxious about markets, and allocation and management problems associated with the salmon industry, have invested in the halibut IFQ fishery. Our combined landings are a tremendous boost to processors and secondary businesses in this fisheries dependent community.

Sincerely,



H. Daniel Hull

CC: Governor Tony Knowles  
Frank Rue, ADF&G

Kari Johnson  
P.O. Box 6448  
Sitka, Alaska 99835  
(907) 747-6042

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DEC - 1 1999

N.P.F.M.C

Honorable Rick Lauber, Chair  
North Pacific Fisheries Management Council  
Anchorage, Alaska

Re: Halibut Guided Sport

Dear Chairman Lauber,

I am a commercial halibut longliner and quota share owner in area 2C. I am also married to a longliner, and mother of three living in Sitka, Alaska.

I value the participation of a guided sport (charter) industry in the economies of our coastal towns in Alaska, but you've got to draw a line somewhere. They are commercial harvesters just like we are, and should live with the same responsibilities to the resource and to other resource users. I would like to see a viable charter industry maintained without it being at the expense of other users of the resource.

I realize that the issues are complex. In some areas like Sitka, we have a fully developed charter industry, and much support for a moratorium on new entrants. In other areas, they are just recognizing the possible benefits of that type of tourism and would like to be able to expand to realize that potential. There are many more difficult issues, the resolution of which will demand a new willingness to adapt on the charter segment of the commercial fishing industry and a sensitivity on the part of management to the unique needs of that segment of the industry.

Not all the issues will be addressed in the first step but that first big step needs to be taken, and it needs to be an allocation to the guided sport industry which reflects the abundance of the resource. This allocation also recognizes the distinction of the charter industry as just that. An industry, another commercial user. They have their public to serve, and we have ours. "Our" public which has been served by responsible stewards of the resource for over 75 years is not having their interests looked after with the erosion of accessible quota toward that part of the public which chooses to, and can afford to take the trip and catch the fish themselves.

The Council members and staff have done a lot of work, the momentum is there, please take this step now before things get worse.

Sincerely,

*Kari Johnson*

cc: Governor Tony Knowles  
Senator Ted Stevens  
Senator Frank Murkowski

Representative Don Young  
Lt. Governor Fran Ulmer  
Mr. David Benton

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DEC - 1 1999

N.P.F.M.C

December 1<sup>st</sup>, 1999  
Robert W. Bowser  
P.O. Box 420 Burley  
Wa 98322

**North Pacific Council Members:**

Having been involved in the North Pacific fisheries for the last 27 ears I believe that everyone must give and take to make the fisheries work. However the continuing debate over guided sport caught halibut must come to an end.

First of all the fishery is a commercial one and should be treated as such.

The allocation given to the commercially guided sport fisheries should be tied to the halibut TAC. Everyone in commercial fishing would love to be able to count on the same catch year after year. Unfortunately this isn't the nature of the business and guarantee to one user group at another user groups expense shouldn't be tolerated.

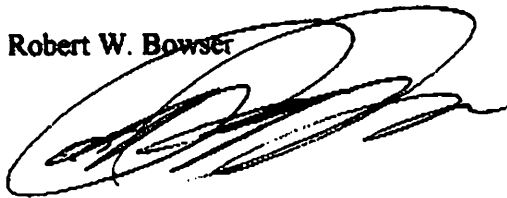
If this is a sport fishery why must every client fly out with 200 lbs of fillets? I have flown out of Sitka numerous times with sport fisherman and heard them talk about how much fish they have. I know my family doesn't eat 200 lbs of halibut in a year and we eat a lot of fish.

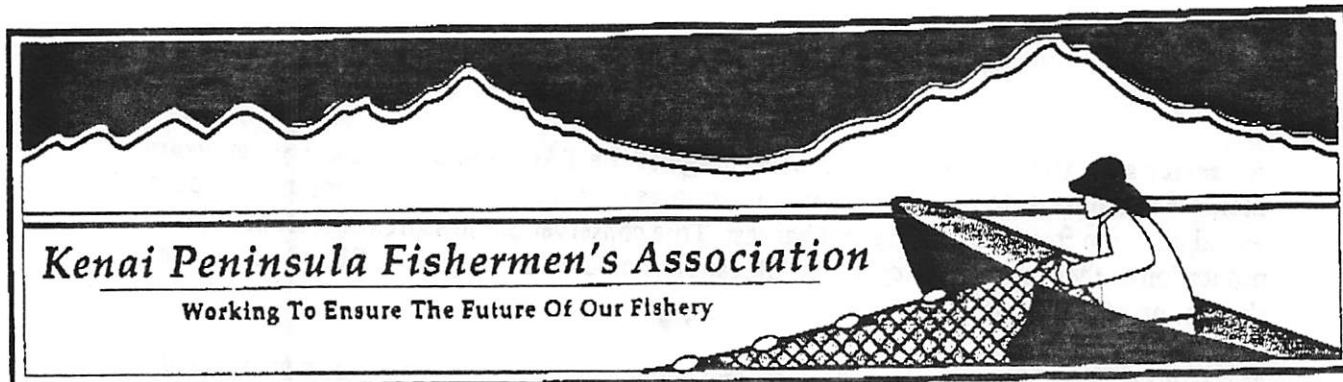
Finally as one who owns IFQ shares I strongly resent the continued fish grab by sport fisherman. I was originally issued only 5000 lbs, but through sound business practices now own 16000of quota. I believe that if the charter operators manage their operations soundly they can also enjoy a viable business.

I didn't buy into the halibut fishery to see it given to someone else at my expense.

Sincerely,

Robert W. Bowser





43961 Kalfornsky Beach Road • Suite E • Soldotna, Alaska • 99669  
 (907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

December 1, 1999

Rick Lauber  
 Chairman  
 North Pacific Fisheries Management Council  
 605 West 4<sup>th</sup> Ave, Ste 306  
 Anchorage, AK 99501

RECEIVED

DEC - 1 1999

N.P.F.M.C

Chairman Lauber,

Kenai Peninsula Fishermen's Association (KPFA) represents the interests of approximately 400 Cook Inlet commercial salmon fishers. The majority of our members are setnetters and those who hold Halibut IFQ predominately have small #s of 3A D class shares. **While by no means "heavy hitters" in the Halibut fishery these fishermen's shares were generally earned pulling by hand and they would hate to loose a portion of them to a slight of hand.**

As an annual participant in the triennial Alaska Board of Fish (BOF) process KPFA is more than familiar with the advocacy role played by the ADF&G sportfish division in allocation matters. Charged with providing opportunity for sportfishers they have been more than willing to advocate for allocation increases and conservation plans borne on the backs of commercial fishermen. It appears as though their success at the BOF level has emboldened them to push the envelope in their recent proposal to the NPFMC.

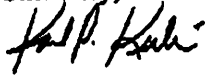
**The ADF&G sportfish division proposal to establish a fixed allocation for the guided sport industry equal to 125% of their 1998 landings barring a "significant stock decline" is a stretch even for the masters of advocacy. They appear to have abandoned the States policy of abundance-based management. Even the Kenai River Late Sockeye Salmon fishery, one of the states most popular and controversial fisheries, is allocated in an abundance-based manner. The switch to 1998 as the base year for allocation is a direct grab at additional resources and should be looked at by the Council as a direct allocative question. However not having the charter allocation expressed as a percentage of the TAC in any given year is an idea that should be dismissed as unsound as well as unfair.**

**A charter allocation not based on a percentage of the TAC would make any given years biomass estimate a de-facto allocation decision as well. Fish needed for conservation purposes would all come from the commercial harvest. True conservation measures take from all users in proportion to their harvest percentage. Allocation should be done by the NPFMC not by the fluctuation of halibut stocks.**

**The NPFMC should not grant a relatively new commercial industry (charters) a guaranteed harvest. If all harvesters wait for the January TAC announcement with equal trepidation we will all fish in June with equal respect for the resource.**

**Thank you for your consideration of KPFA's comments.**

Sincerely,



**Karl Kircher  
Executive Director**



Wind and Tide, Inc.

P.O. Box 6282, Sitka, Alaska 99835 - (907) 747-3107  
windtide@ptialaska.net

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DEC - 1 1999  
N.P.F.M.C.

Rick Lauber, Chair  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage AK 99501-2252

November 30, 1999

Dear Mr. Lauber and Members of the Board,

I am writing in opposition to the amazing proposal put forth by the Alaska Department of Fish and Game to the North Pacific Fisheries Management Council that would establish a priority preference for the guided sport industry over all other users of the halibut resource. This proposal would award the guided sport industry a *fixed* allocation of halibut equal to 125% of their 1998 landings. It contains an option that in years of low abundance would essentially shut down the commercial fishery in Area 2C, yet leave the guided sport industry untouched.

I am one of those folks that did not receive a significant quota share when the IFQ system was implemented. Instead, I purchased quota—using a loan from the State of Alaska—thinking that investing in the halibut fishery was one way to stabilize my fishing enterprise and supplement my salmon trolling income. I currently owe the State of Alaska \$88,000 for my IFQ loan, and nearly \$100,000 for my fishing vessel loan. My total capital investment in my fishing enterprise is around \$350,000. Proceeds from halibut comprise roughly 30% of my gross income. This proposal for a *new* allocation could significantly affect my ability to repay my loan obligations.

The ADFG Sportfish Division proposal would give the guided sport industry a fixed allocation *in pounds*. This is an extreme departure from the State of Alaska's stated goal of using abundance-based management for *all* users. Establishing a priority preference for guided sport threatens not only the commercial industry, but the local sport and subsistence users as well.

I am a member of the Alaska Seafood Marketing Institute, and I direct market my own catch. From a marketing standpoint, one obstacle the Alaska seafood industry faces is inconsistent supply. Increased production of farmed halibut is in our future, and we must do all we can to maintain a strong market presence. Natural fluctuations in supply due to abundance are enough of a challenge, without the added (and possibly fatal) factor of political reallocation of the resource.

Finally, it is inappropriate for a Division of ADFG to advocate on allocation issues. ADFG should stick to management, not allocation.

I appreciate the time and effort that went into 1997 adoption of a Guideline Harvest Level for the Guided Sport sector, and the hard work that goes into the Council process. Thank you for your careful consideration of this very important issue.

Sherry Tuttle

Mark Hofmann  
F/V Ocean Oasis  
3900 Twilight Lane  
Anchorage, AK 99516

Rick Lauber, Chair  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage AK 99501-2252

November 30, 1999

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DEC - 1 1999  
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I am one of those folks that did not receive a significant quota share when the IFQ system was implemented. Instead, I purchased quota—using a loan from CFAB—thinking that investing in the halibut fishery was one way to stabilize my fishing enterprise and supplement my salmon trolling income. I currently have \$130,000 invested in halibut quota share, and my total capital investment in my fishing enterprise is around \$400,000. Proceeds from halibut comprise roughly 40% of my gross income. This proposal for a *new* allocation away from the commercial fleet could significantly affect my ability to repay my loan obligations.

The ADFG Sportfish Division proposal would give the guided sport industry a fixed allocation *in pounds*. This is an extreme departure from the State of Alaska's stated goal of using abundance-based management for *all* users. Establishing a priority preference for guided sport threatens not only the commercial industry, but the local sport and subsistence users as well.

I am licensed as a processor with the State of Alaska, and I direct market my own catch. From a marketing standpoint, one obstacle the Alaska seafood industry faces is inconsistent supply. Increased production of farmed halibut is in our future, and we must do all we can to maintain a strong market presence. Natural fluctuations in supply due to abundance are enough of a challenge, without the added (and possibly fatal) factor of political reallocation of the resource.

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Mark Hofmann





December 1<sup>st</sup>, 1999  
Richard Johnson  
Box 1476  
Anacortes, WA  
98221

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DEC - 1 1999

N.P.F.M.C

**North Pacific Council Members:**

Having been involved in the North Pacific fisheries for the last 25 years I believe that everyone must give and take to make the fisheries work. However the continuing debate over guided sport caught halibut must come to an end.

First of all the fishery is a commercial one and should be treated as such.

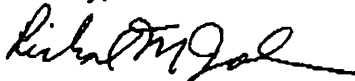
The allocation given to the commercially guided sport fisheries should be tied to the halibut TAC. Everyone in commercial fishing would love to be able to count on the same catch year after year. Unfortunately this isn't the nature of the business and guarantee to one user group at another user groups expense shouldn't be tolerated.

If this is a sport fishery why must every client fly out with 200 lbs of fillets? I have flown out of Sitka numerous times with sport fisherman and heard them talk about how much fish they have. I know my family doesn't eat 200 lbs of halibut in a year and we eat a lot of fish.

Finally as one who owns IFQ shares I strongly resent the continued fish grab by sport fisherman. I was originally issued only 5000 lbs, but through sound business practices now own 30000 lbs of quota. I believe that if the charter operators manage their operations soundly they can also enjoy a viable business.

I didn't buy into the halibut fishery to see it given to someone else at my expense.

Sincerely,



Richard M. Johnson

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NOV 29 1999

N.P.F.M.C

Honorable Rick Lauber, Chair, NPFMC

Dear Mr. Lauber,

I am very concerned by the intentions of the Alaska Department of Fish and Game and the North Pacific Fishery Management Council to set a fixed annual poundage for the halibut charter fleet, rather than an allocation based on stock abundance.

I have been involved in the commercial halibut fishery for almost 25 years and it constitutes a large percentage of my family's annual income. Indeed, almost the entire community of Petersburg relies heavily on commercial halibut dollars. Fish processors, grocery stores, hardware stores, boat repair shops, electronic shops, airlines and many others, all receive a share of the commercially caught halibut. Both my son and I have invested a considerable amount in halibut IFQ'S and reducing the commercial harvest will make it much harder to pay IFQ loans as well as reducing the value of our boat and IFQ'S.

I think history shows this fishery has been based on stock abundance[at least since 1923 under rules adopted by the International Halibut Commission]. Management based on abundance has made halibut a viable fishery and this management must remain in place. In 1997, the North American Fishery Management Council recommended the charter allocation should be set at 125% of the 1995 charter harvest. I think this is a generous and fair allocation and the one that should be used now.

Mr. Lauber, please do not let the North Pacific Fishery Management Council adopt a fixed poundage allocation for the halibut charter fishery. Thank you.

Sincerely,

*Peter A. Nilsen*

Peter A. Nilsen  
F/V SEAFORTH  
P.O.Box 427  
Petersburg, Alaska 99833

cc.Mr. Joe Kyle  
Senator Ted Stevens  
Senator Frank Murkowski  
Lt. Governor Fran Ulmer

Commissioner Frank Rue  
Dep. Commissioner David Benton  
Representative Don Young

November 28, 1999

Dear Members of the North Pacific Fisheries Management Council:

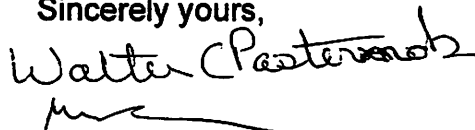
My wife and I started fishing halibut from a 16-foot aluminum skiff in 1976. We bought our current 41-foot longliner/troller in 1980 and have been fishing her for halibut ever since. In 1997 we bought \$90,000 worth of Area 2C and 3A halibut shares as part of the IFQ program. The halibut fishery in 2C and 3A has been very important to my family for 24 years.

In the spring of this year, the Alaska Department of Fish and Game had the gumption to ask you members of the council to give guided charter operators in areas 2C and 3A 125% of their best year's catch, as reported by those same operators via logbooks. Accuracy of their data is dubious, at best. I question the use of data from their 1998 logbooks.

This guided harvest fishery has been a growing problem for the past five years as the effort and catch rates of it have been left unregulated. I am urging you to implement slow-down restrictions and a cap of 125% of their 1995 harvest record on the guided charter fleet for areas 2A and 3C.

In closing I would like to say taking halibut away from the historic commercial fleet and giving it to the ever-expanding and unregulated commercial charter operators is not an option.

Sincerely yours,



Walter C. and Megan R. Pasternak  
F/V Lory  
Box 830  
Sitka, AK 99835  
(907) 747-5943  
[mwpstnk@ptialaska.net](mailto:mwpstnk@ptialaska.net)

*Duplicate*

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DEC - 1 1999

N.P.F.M.C

December 1, 1999

The Honorable Rick Lauber

Dear Sir:

I am a fifty year Alaskan resident with thirty five years of sport, commercial and subsistence fishing experience. I also am a licensed guide in the sport charter business, currently for Wood Hook Charters.


I would like to address the proposal by the ADF&G Sport Fish Division asking for 25% of the halibut quota in ares 2C and 3A.

The sport-subsistence sport-charter groups are now allowed to catch two halibut a day 335 days a year. In theory a person could catch 670 halibut, with no size restriction, per year. This is more than enough to satisfy any sport or subsistence need.

If the sport-charter group still feels it needs more fish perhaps they should be allowed to buy quota as other groups are allowed to do. The benefit of this approach would be that no-one would be hurt financially or forcefully displaced from a fishery.

This proposal is not based on need rather on greed and is not responsible.

Respectfully;



Mike Douville

P.O. Box 68

Craig, Alaska 99921

cc. Alaska Gov. Tony Knowles

fax: 907 465 3532

**F/V CHERRY**  
**TODD & TAMI BAYNE**  
P.O. BOX 3036  
SITKA, AK 99835

December 1, 1999

NPFMC  
Richard Lauber, Chairman  
605 W. 4th Ave., Suite 306  
Anchorage, AK 99501

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DEC - 1 1999

N.P.F.M.C

Dear Mr. Chairman,

We are a small family operation, which includes our two children as deckhands and future commercial fisherman. We were forced to buy into the IFQ system to continue our way of life. We had hoped by buying into this fishery we would have a career for our family and a future for our children. This way of life is now being threatened by the proposed fixed allocation of Halibut poundage to the Charter boat industry.

I would like to make a comment in regards to Governor Knowles' response to the economic hardship of the Charter industry. Mr. Knowles states "The guided halibut charter industry may not be able to adapt to sudden changes in harvest levels as easily as the commercial fleet." What kind of garbage is that? Where does he get the impression that the commercial industry will be able to bounce back so easily. Do we not have boat payments? Do we not have IFQ loan payments? As well as the operating costs of commercial fishing. When our quota goes down our payments stay the same!

When you look at the commercial fisherman, the majority of us have fished our whole lives, that is all we know. We do not have other jobs to fall back on. If you look at the majority of Charter boat operators, they have other jobs. Their season is for four months. This allows them the flexibility to have their regular jobs, such as school teachers, non-resident seasonal workers, construction trades, etc..

If the Charter industry is a true sport fishery, they would be willing to practice hook and release, such as is done in most other states and countries during periods of low stocks. But if they are a commercial industry hiding behind the label of "Sport fisherman", they will need massive wetlock boxes for their non-resident clients. This is hardly a decent reason to sell out the commercial fishing industry in Alaska.

Please consider the economic hardship on all user group before making your decision on this issue.

Thank you for your time,

*Todd & Tami Bayne*

The Bayne Family  
cc: Governor Tony Knowles

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DEC - 1 1999

N.P.F.M.C

Nov. 30, 1999

2843 Jorgans #3

Katolukew, Conn.

Habitat Coalition

P.O. Box 22073

Jensen, OR. 97502

Please do whatever you can  
to prevent the raising of the  
Habitat Quotas for Charter Fisheries.  
We have IFO for Area 2C.

Sincerely,

Margaret Fisher  
Mansell Fisher

copy: Governor Knowles

Chairman Lusher, NPFMC

ADFG

Delegation

November 26 - 99

To Governor Knowles, Chairman Lamber

I am an Alaskan Commercial fisherman, I have been fishing halibut and salmon since 1947 after returning from military duty in the Aleutian Islands. For years we had no concerns about occasional sport or subsistence halibut caught. But times have changed.

Just read the Alaska magazine! See the advertisements. Many charter outfits want to take thousands of customers out to catch halibut. They are easy fish to catch for sports and put up a good fight.

Charter boat operators do not consider the fact that halibut fishing has been regulated for years for and by commercial halibut fishermen to save the resource from total destruction. They are going for total destruction as long as they get in a few years of good reaping. Most of them do not live in Alaska.

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DEC - 1 1999

N.P.F.M.C

Charter boat operators should pay the state to have the licenses and various fish that were caught checked by state employed personnel. I have noticed in Sitka that there are not enough personnel to check them all. Commercial halibut fishermen are checked thoroughly.

Maybe sports boat Captains should keep a log - Name and address of all clients and their licence numbers and the size and type of every fish caught and deposit the information in a locked box where they unload. It would be easier for the state to get the information that way. Halibut (commercial) fish boats are closely controlled. Daily logs, and location - plus helicopter overhead and the fish are weighed and graded. I hope this information and suggestions will help get the problem under control.

Regards, Angelita Aute  
 7V. "Aquila" of Sitka  
 710 Monastery St, Apt 2, Sitka, AK 99835



Steve Fish  
P.O. Box 6448  
Sitka, Alaska 99835  
(907) 747-6042

RECEIVED

DEC - 1 1999

Honorable Rick Lauber, Chair  
North Pacific Fisheries Management Council  
Anchorage, Alaska  
Re: Halibut Guided Sport

N.P.F.M.C

Dear Chairman Lauber,

I am a commercial halibut fisherman and I am writing to ask you to stop the open-ended re-allocation of halibut from commercial longliners to commercial guides for sport fishermen. This issue has been before the council since 1993 and though we have all benefited from the dialog in the time since then, it is now time for the council to act.

This is no "greedy resource grab" by the longliners. The halibut quota had been fully prosecuted for decades by both sport and commercial fishermen before the relatively recent growth of the guided sport (charter) industry allowed what amounted to a re-allocation of halibut quota to a new commercial user group. Longliners have already given up a percentage of the quota. We have shown our willingness to give more, with the GHIL previously approved by the council, to allow for continued growth and flex in the charter business.

The relatively new halibut charter industry in general has been good for our local economies here in Alaska and elsewhere in the country. So too do the long established harvesting, processing, shipping, marketing, and retailing industries, and most important, the fish-eating public depend upon a healthy longline industry. The charter industry and the longline industry are both groups of professional fishermen who ultimately depend upon the health of the resource and access to it. And we both have a public to serve.

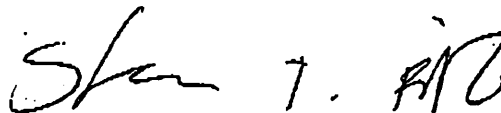
All user groups have unique needs. I respect the need of the charter businesses to know what they may be allowed to provide for their clients who book a year in advance. Perhaps a compromise can be reached whereby any regulatory changes necessitated by reaching the GHIL in a given year would not come into effect until 2 years hence instead of the following year. Or, with a fixed charter quota, if there were more ratchet-downs starting at a higher total quota level it may be a more equitable sharing of the conservation responsibility in years of low abundance.

It should be noted here that we in the longline industry are not ultimately adaptable and have experienced much hardship as a result of operating within the constraints of falling sablefish quotas, with bankruptcies and delayed and defaulted loan payments. This is the cost of conservation. We don't have to like it, but we do have to operate under it.

I feel that there is a compromise solution which would include improved data gathering from the charter boats and an allocation which gives them a degree of stability they can work with. They will need to be willing to take adaptive measures to accommodate a higher standard of accountability. Action is needed now to bring stability to all users of this resource and to maintain management practices which assure its long-term viability.

Thank you for your consideration of these points and for your dedication to this decision making process.

Sincerely,



Cc: Governor Tony Knowles  
Senator Ted Stevens  
Senator Frank Murkowski

Representative Don Young  
Lt. Governor Fran Ulmer  
Mr. David Benton

# Petersburg Vessel Owners Association

P.O. Box 232  
Petersburg, Alaska 99833  
Phone (907) 772-9323 Fax (907) 772-4495

November 30, 1999

Mr. Rick Lauber, Chairman  
NPFMC  
605 West 4th Avenue, Suite 306  
Anchorage, Alaska 99501-2252

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

Re: C-3 Halibut Charter GHL: Initial Review of Analysis and Alternatives.

Dear Chairman Lauber and Members of the Council,

On behalf of Petersburg Vessel Owners Association, I am providing comments on the alternatives including suggestions for deletions and additions.

This is a very important issue for PVOA and Petersburg fishermen in general. PVOA represents sixty vessel owners and crew members as well as twenty associated businesses. Every member of PVOA is halibut fishermen. Two hundred and fifty-five Petersburg residents hold approximately five million pounds of halibut Quota Share predominately in 2-C and 3-A. Halibut landings in Petersburg in 1999 were 2.3 million pounds including 22% of the 2-C catch.

In considering this issue, the Council needs to recognize that the public has three methods of "opportunity" in access to the halibut resource. The public can fish unguided; the public can fish on a charter boat; or the public can buy commercially caught halibut. The majority of the public that utilizes the halibut resource, buys commercially caught halibut.

## SUMMARY

1.) This issue has been in front of the Council since 1993. At this time, the Council is supposed to be considering appropriate management measures to implement the GHL as passed in 1997. While the Council must give full consideration of the issue, the Council needs to make progress and not re-invent the wheel, i.e. by re-analyzing the GHL itself.

2.) PVOA supports the 1997 GHL based (125% of 1995) as expressed as a percentage of the combined commercial quota plus the charter catch. This was a compromise that recognized historic charter catch plus unprecedented allowance for growth opportunity. As a percentage, the charter catch would vary with abundance, as does the longline fishery. In the parlance of the alternatives, we support a "cap". It should be recognized

that in other fishery forums, such as the Board of Fish and the Pacific Salmon Treaty, an "allocation" does not necessarily mean an in-season closure. The Council may receive comments from fishermen advocating for an allocation when in reality they mean a "cap" as described in the alternatives.

3.) PVOA supports the original intent of the Council in which the GHL is a trigger. Once the GHL trigger is reached, management measures would be taken the following year. This premise only works with meaningful management measures and if ADF&G Sportfish turns the data around in a timely fashion, i.e., the next year and not two years later. With these two caveats, the charter fishery could have an uninterrupted season of historic length. That uninterrupted season could be jeopardized by lack of meaningful management measures or data problems. We support the goal of a continuous season, but recognize along with the SSC, the lack of meaningful measures could precipitate an in-season closure in the year after reaching the GHL trigger.

4.) PVOA would like to see the alternatives with fixed harvest amounts deleted from the analysis as they do not answer the problem statement as to open-ended reallocation from the longline fleet nor to local depletion. If the Council chooses to include these alternatives that are not responsive to abundance, the impacts should be fully noted. The reductions proposed for years of significant stock decline are ineffectual.

5.) PVOA would like to add the following management measures to the "toolbox": prohibition on retention by mates and skippers on charter boats; and prohibition on use of downriggers. These are measures that have been quantitatively assessed previously in the SEAK Chinook Salmon Management Plan. The SSC

6.) PVOA encourages the Council to consider management measures by area. Conditions and use patterns in 2-C and 3-A are different and abundance changes could vary. Different bag limits could be utilized. In 2-C, at high abundance, the average client is catching one halibut while in 3-A, the average client is catching 1.66 halibut per trip.

7.) PVOA strongly encourages the Council to drop consideration of proposals based on the 1998 data particularly in 2-C. The doubling of the harvest pounds comes largely from an unprecedented weight gain in the average size halibut. The increase in catch did not come from an increase in abundance nor effort. The average size fish grew 37% only in 2-C and only in 1998. This size gain is contrary to preceding years (1995-97) in 2-C; is contrary to any year in 3-A including 1998; and is contrary to trends observed by the IPHC in the halibut survey and commercial catch. If one uses the average size fish from 1995-97 in 2-C (in lieu of 1998), the charter catch is substantially reduced. Logbooks also overstated harvest of numbers of fish as compared to the creel census in three ports in SEAK. Overestimations ran from 8% in Sitka, to 19% in Ketchikan, and to 31% in Juneau. Due to differences in magnitude, the average overestimation is 11%. If this "blarney factor" is deducted from the harvest (along with the weight gain), the 2-C charter catch becomes 1.2 M pounds. This translates to 10% of the combined TAC, well below the 12.76% GHL.

8.) In regards to moratorium, PVOA recognizes that this can be a long contentious process. We also note in BOF proposals in regards to such moratoriums, that the proposal for a moratorium would be withdrawn if the GHF went away. This is not a chicken or the egg argument. The GHF provides the incentive, i.e. the GHF must happen first. If the moratorium process unduly delays implementation of the GHF, Council should examine what measures address the problem statement of "open-ended reallocation" and "local depletion".

9.) PVOA requests the Council to initiate a discussion paper separate from the GHF process to address the concern raised by the SSC. "The SSC notes that even in the unlikely event that an initial allocation between charter and commercial operations is optimal, changes in ex-vessel price, factor costs, willingness to pay for charter trips, etc. will render that allocation suboptimal in subsequent periods. One mechanism that would allow the allocation to self-correct would be an IFQ. While this is not an option defined by the Council, it is an option that deserves consideration." IFQs would allow transfer between the two sectors without re-negotiating the allocation every year conditions change.

10.) The Council has received many letters in regards to this issue. Many of these letters solicited from the charter fleet cite inaccurate numbers, so in part these mailings were generated under false pretenses.

a.) Contrary to assertions from the Alaska Sportfish Council, Alaska residents do NOT comprise 36% of the charter clients. It is 3% in 2-C and 33% in 3-A, but the aggregate is 20% due to differences in magnitude.

b.) Contrary to the Recreational Fishing Alliance, the commercial fleet does not catch 60 M pounds in 2-C/3-A. This is a 71% overstatement. Contrary to what the RFA reports as the charter catch (3.5 M pounds), that is a 33% understatement.

c.) The Council is only considering bag limits on guided sport and not all sport as reported by the Alaska Sportfish Council and the RFA.

Thank you for your consideration,



Gerry Merrigan  
Director, PVOA

# Petersburg Vessel Owners Association

P.O. Box 232

Petersburg, Alaska 99833

Phone (907) 772-9323 Fax (907) 772-4495

November 30, 1999

## GHL Roadmap

**Figure 1:** The Council has already passed a GHL in 1997. A Halibut Charterboat Committee was formed to develop management measures.

**Figure 2:** The Council has a long history with this issue since 1993 prior to passing the 1997 GHL.

**Figure 3:** While the Council has been considering this issue, the charter halibut harvest has almost doubled in 2-C/3-A according to ADF&G Sportfish.

**Figure 4:** Most of this increase occurred in 2-C. Total pounds comes from the number of fish X the average weight sport caught halibut. The numbers of fish comes from logbooks and the Statewide Harvest Survey. The average weight comes from the creel census.

**Figure 5:** Is the 1997 GHL constraining the charter fleet? In 2-C, the charter catch exceeded the GHL. However, the average size halibut increased 37% in 2-C in 1998. The pounds therefore increases 37% without catching any additional fish from the previous year. This size increase is not found in any other year in 2-C or 3-A. If the 1995-1997 average weight from 2-C is used, the GHL was not reached in 1998 in 2-C.

**Figure 6:** The GHL has not been reached in 3-A.

**Figure 7:** IPHC is predicting a decline in halibut abundance.

**Figure 8:** Commercial longline quota history for 2-C. In the early 1980's, the quota was 3.5 million pounds.

**Figure 9:** Commercial longline quota history for 3-A. Similar pattern as 2-C

**Figure 10:** The Halibut GHL Committee returned few significant management measures. The Council added bag limits. From the Oct. 1999 NPFMC meeting, the SSC minutes state, "The SSC is concerned that lack of in-season management measures may limit the ability to manage this fishery and further concerned that alternatives being analyzed provide limited opportunity to effectively constrain recreational harvest, leaving the Council without sufficient controls should they choose to exercise them." The GHL Committee did adopt the ADF&G Sportfish proposal of a fixed harvest.

**Figure 11:** The major problems with the alternatives are the use of a fixed harvest, the use of 1998 data in 2-C, and the lack of meaningful management measures.

**Figure 12:** The fixed harvest proposal gives the charter fleet half the combined TAC (commercial quota plus charter catch) in 2-C in years of low abundance. If abundance declined to 1980's levels (3.5M), the charter fleet would take two-thirds of the combined TAC. In any historic abundance level, the fixed harvest exceeds the 1997 GHL.

**Figure 13:** The maximum reduction proposed in years of significant stock decline do very little to address conservation or the open-ended reallocation from the longline fleet to the charter fleet at any level of abundance.

**Figure 14:** The fixed harvest proposal in 3-A gives the charter fleet one-third the quota in years of low abundance. The 1997 GHL is exceeded in average to low abundances.

**Figure 15:** Again the maximum reduction proposed in years of significant stock decline does very little to address conservation or reallocation.

**Figure 16:** The use of 1998 data is problematic in 2-C, where the average size sport caught halibut increased 37%. This is an exception to the trend observed by the IPHC in their survey and the commercial setline catch.

**Figure 17:** The average size sport caught halibut did not go up in 3-A. The average size fish in 2-C declined slightly from data presented at the Oct. '99 NPFMC meeting from the Feb. '99/April '99 NPFMC meetings. The opposite occurred for 3-A though the anomaly in 2-C is still quite evident. The average of 1995-1997 in both 2-C and 3-A yields very similar results well below the 1998 2-C data. Again, the only inconsistent data is 2-C in 1998.

**Figure 18:** The charter harvest increase in poundage came from three factors: an actual increase in the number of fish harvested, an increase in the reported number of fish harvested ("Blarney Factor"), and increase in the average weight of the fish. If the preceding two factors are discounted, the adjusted harvest drops to 1.2 M with a 10% GHL (below the 12.76%). The "Blarney Factor" is the average difference between logbooks and the creel census in 1998 in Sitka (+8%), Juneau (+315), and Ketchikan (+19%) as presented at the Oct. 1999 NPFMC meeting.

**Figure 19:** Factoids from the logbooks and comparison statistics.

**Figure 20:** Considerable finger-pointing has been conducted at the commercial by-catch. By-catch mortality in the longline fleet is low. Charter boats also have a level of mortality associated with catch and release.

FIBRICE L

# Federal Register Notice

3/10/1998

“ The Council’s recommended GHGs for the guided sport fishery IPHC Areas 2-C & 3-A would be based on the guided sport fleet receiving 125% of its 1995 catch, expressed each year as a percentage of each year’s combined commercial and guided sport harvest levels. The percentages are: **12.76** percent for 2-C and **15.61** percent for 3-A.”

“ The Council’s stated purpose for recommending these GHGs was to place an upper limit on the future harvest of halibut by the guided sport industry.”

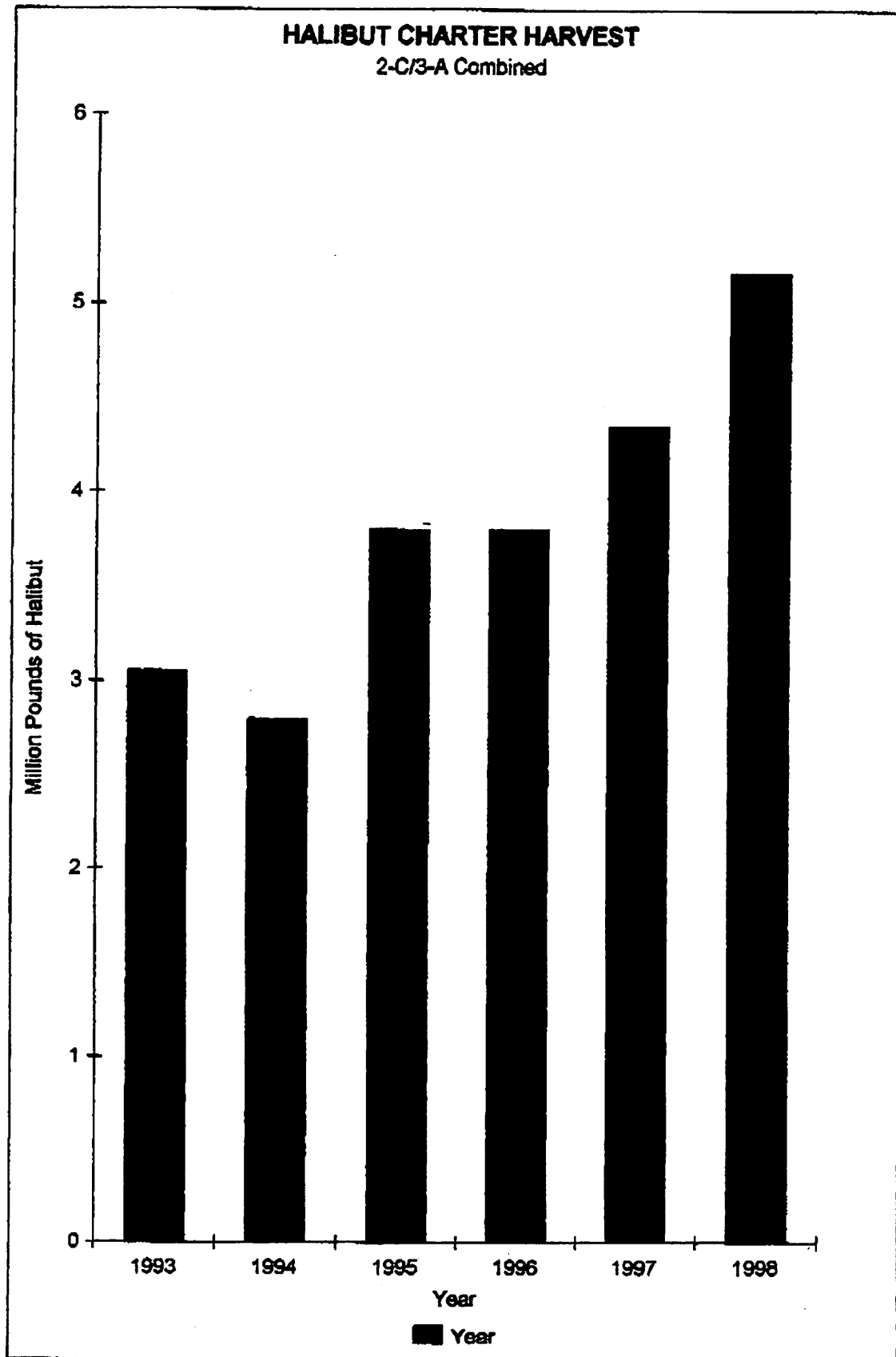
“The Council.....decided to form a Halibut Charterboat Committee. The Committee is tasked with developing management measures to keep guided sport catch under the established GHGs in IPHC Regulatory Areas 2C and 3A.”

**FIGURE 2****NPFMC and the Halibut Charter GHL**

- 1993: GHL first proposed. HCWG formed. Charter harvest = 3.05 M pounds.
- 1994: HCWG meets twice, reports to Council. Charter harvest = 2.8 M pounds.
- 1995: Council adopts Draft Problem Statement. Charter harvest = 3.8 M pounds
- 1996: Council redefines alternatives. Charter harvest = 3.8 M pounds.
- 1997: Council adopts GHL. NMFS requests management measures. GHL Committee. Charter harvest = 4.35 M.
- 1998: First year of mandatory logbooks. Charter harvest = 5.16 M pounds.
- 1999: Management measures for the GHL.

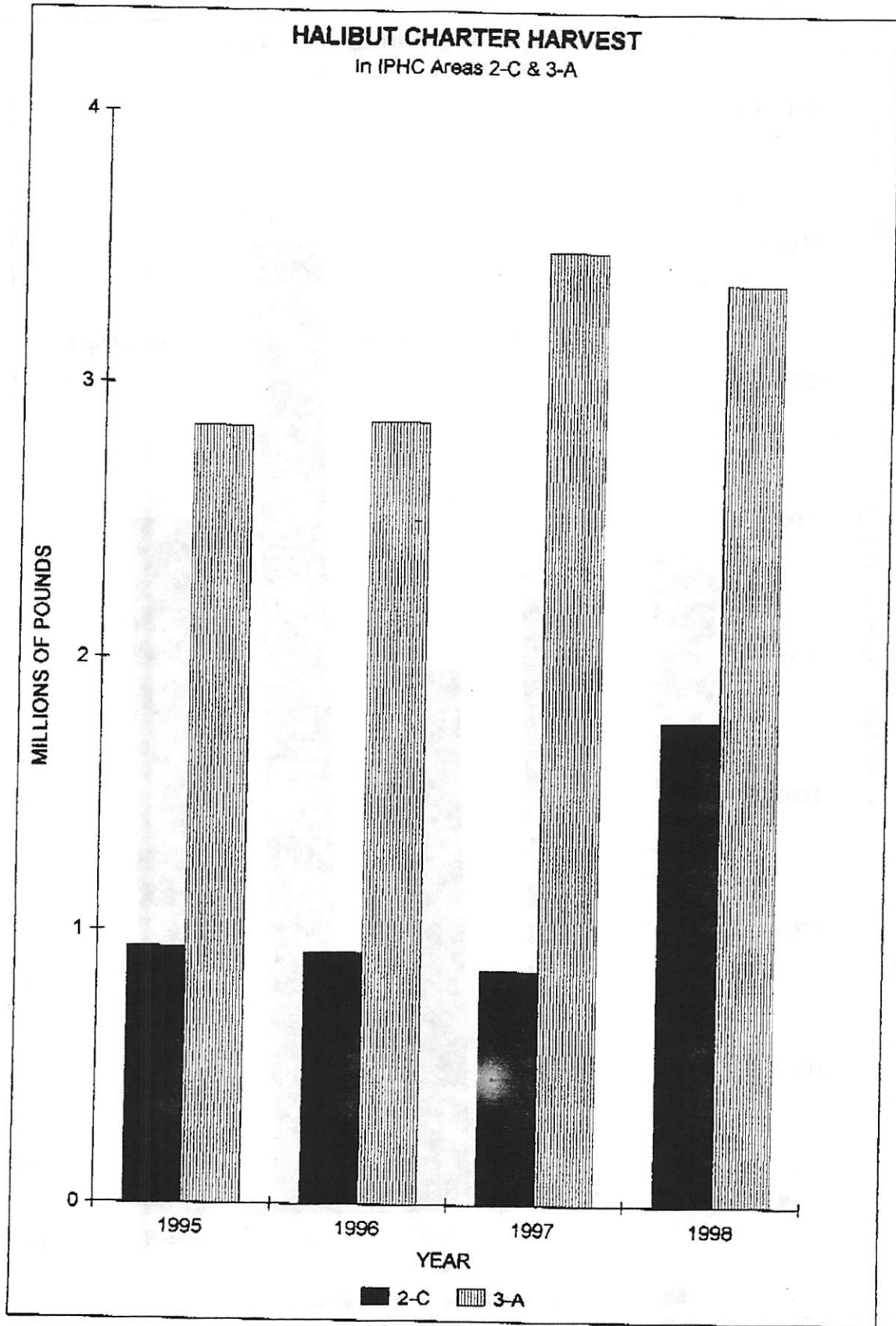


FIGURE 3



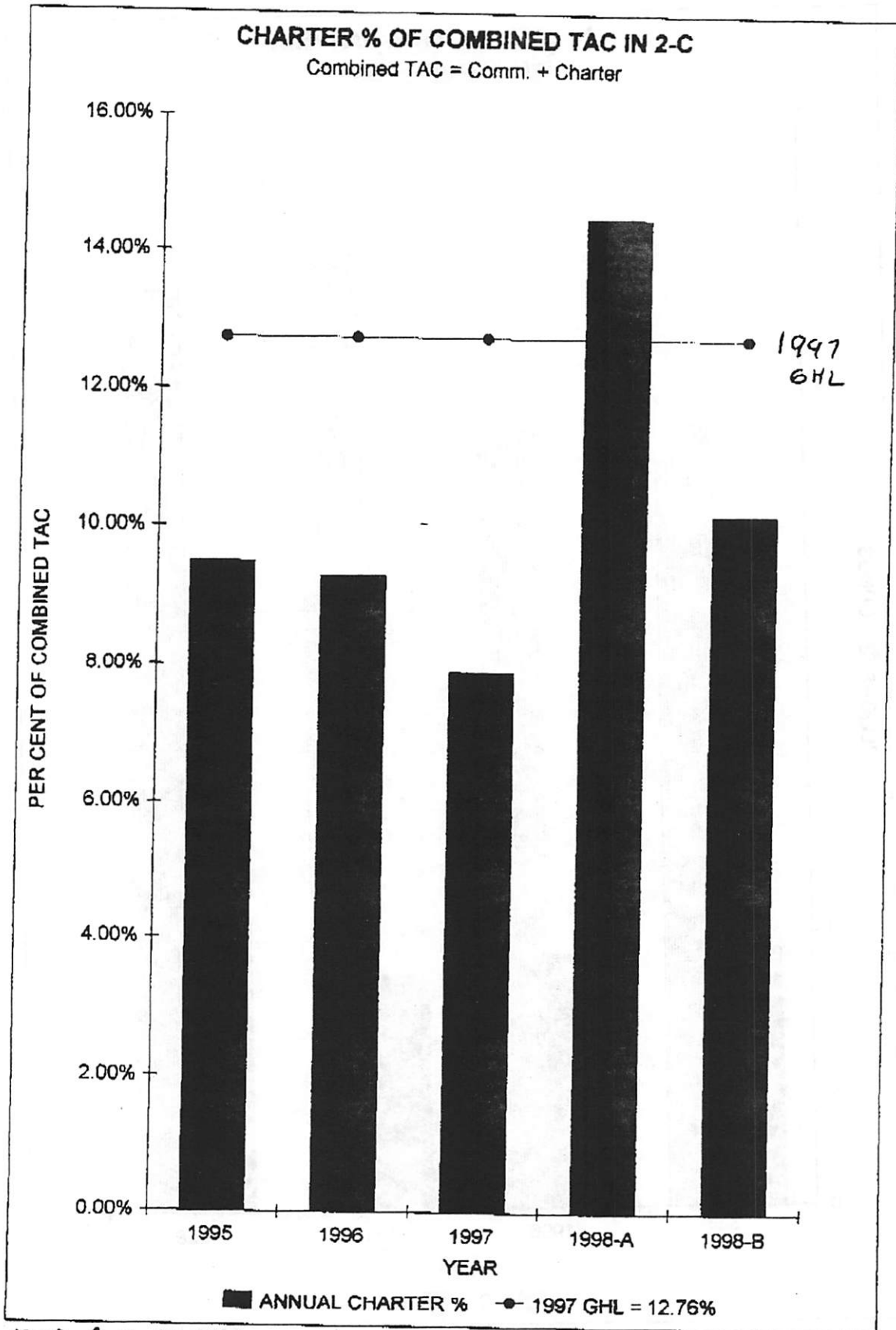
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Figure 4



④

FIGURE 5

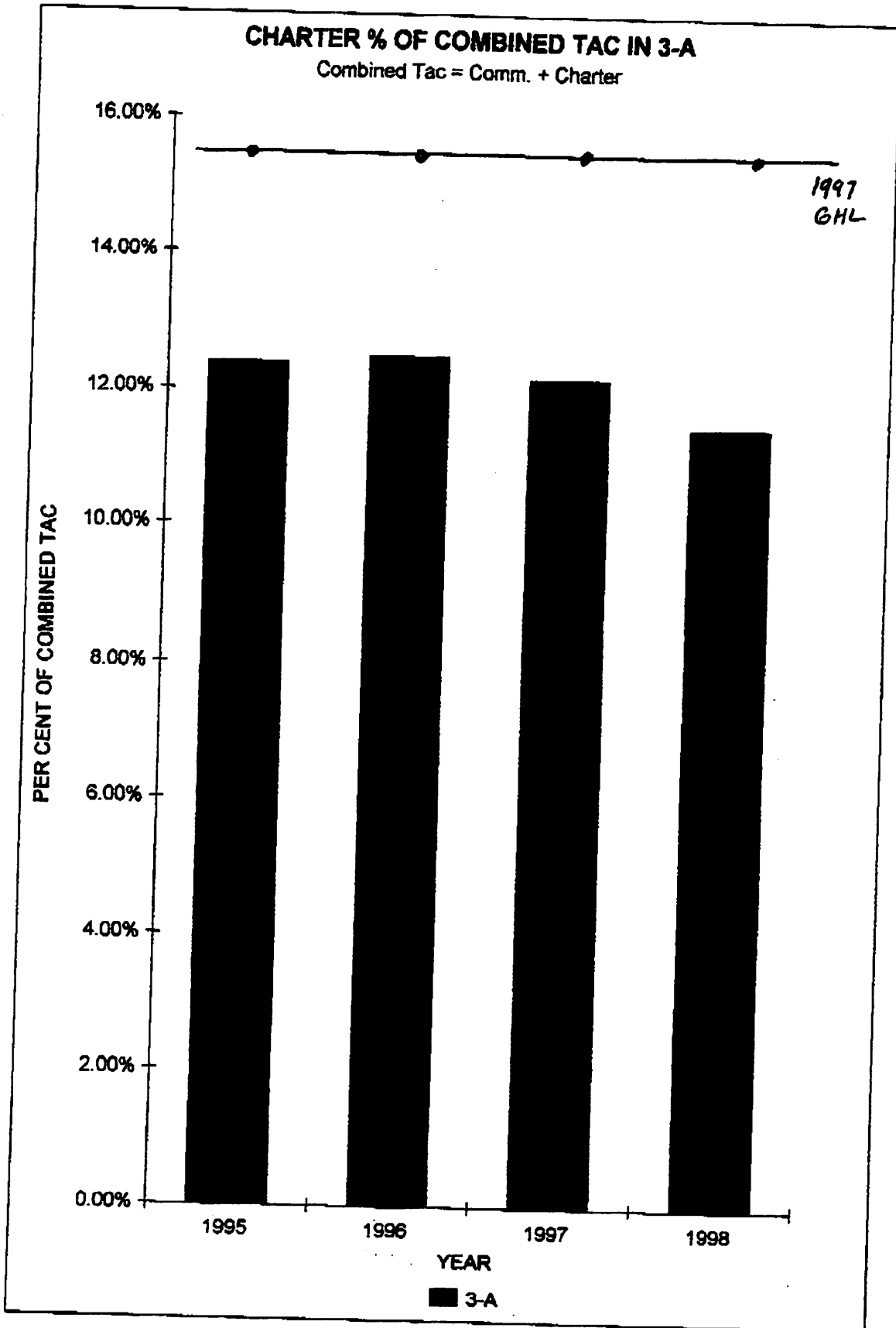


1998 A = UNADJUSTED - USES 1998 AVERAGE WEIGHT

1998 B = ADJUSTED - USES 1995-97 AVERAGE WEIGHT

5

FIGURE 6



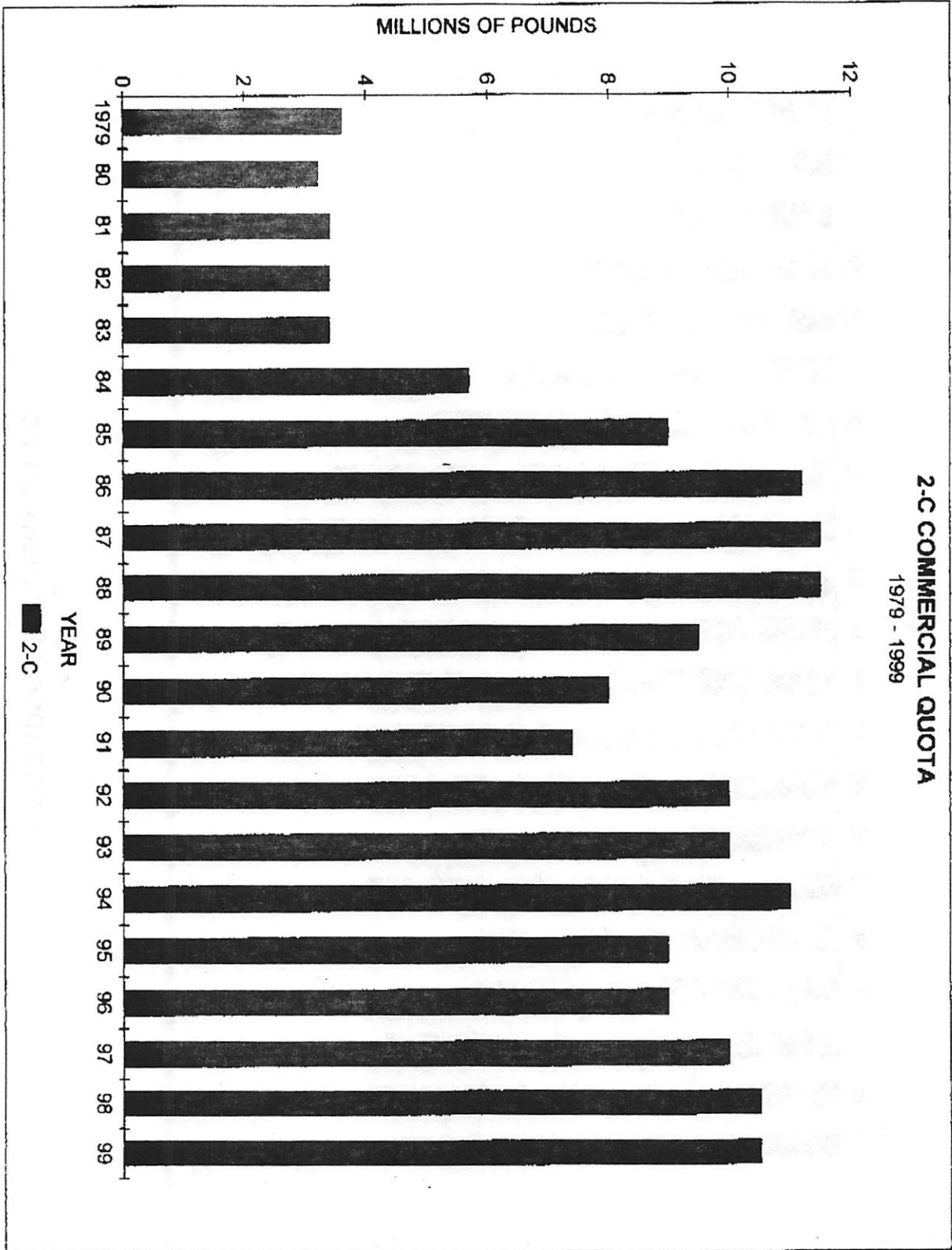
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1 104:12 /

## **from IPHC Report: 1999 Catch Limit Recommendations**

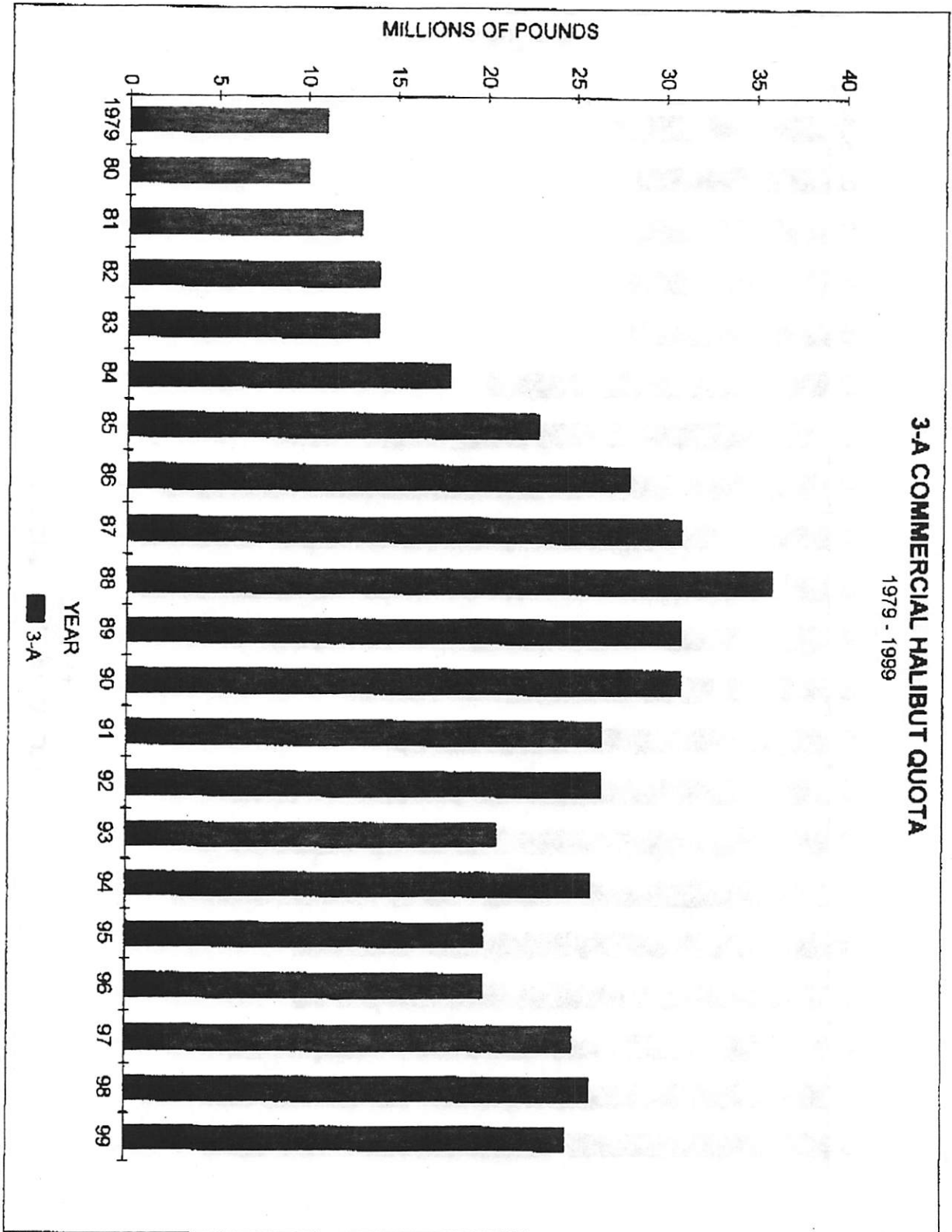
“The present levels of halibut biomass and the associated setline yields are likely not sustainable. Halibut stocks are at a high level because recent exploitation rates have been low and a strong year class has recruited to the exploitable stock. The stock biomass is expected to decline, as a result of natural fluctuations in recruitment. This decline is expected to occur over the next 3 to 5 years and may lead to lower estimates of available yield.”

Figure 8



8

FIGURE 9



9

FIGURE 10

## Halibut GHL Committee Recommendations

- 1.) Update Problem Statement (logbooks)
- 2.) Add as an alternative: consideration of an area-wide moratorium.
- 3.) Add as an alternative: ADF&G Sportfish Division Proposal of a fixed harvest amount.
- 4.) GHL should be in net weight from reported number of fish X average weight as reported by ADF&G Sportfish
- 5.) "The committee continues to affirm its recommendation that a halibut GHL is not needed."

Management measures considered: line limits, boat limits, annual angler limits, vessel trip limits, rod permits, exclusive registration, sportfish reserve, sport catcher vessel only area. Did not include bag limits.



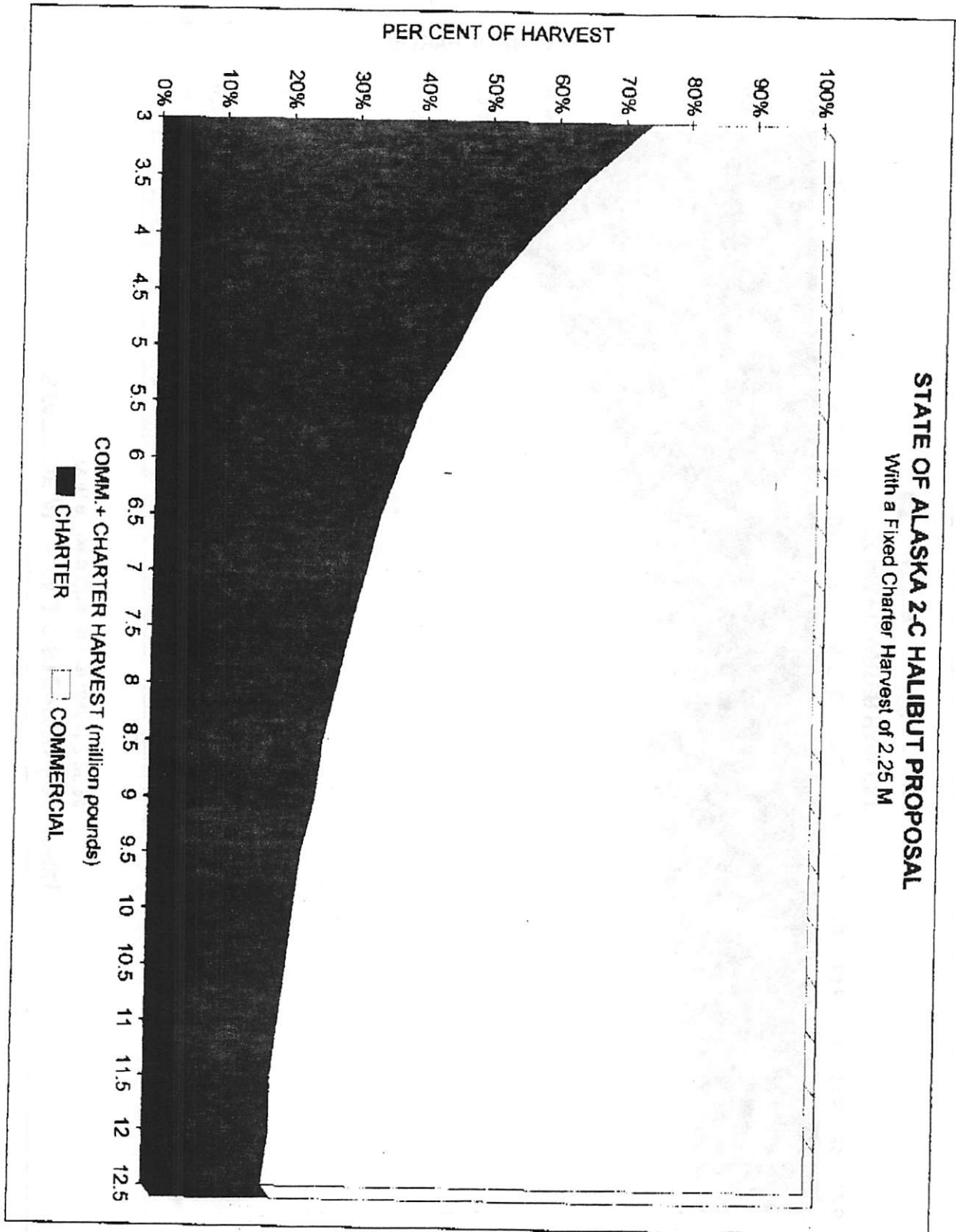
Figure 11

## **Problems With the Alternatives**

- 1.) Fixed Harvest Amount: Does not vary with abundance. In years of low abundance, the charter fleet would be allocated half the quota.**
  
- 2.) Basing the GHL on the 1998 Charter Harvest: The 1998 logbook data contains many anomalies. It doubles the 2-C charter harvest.**
  
- 3.) Inadequate Management Measures: If less than meaningful measures are adopted, the GHL will be repeatedly exceeded and this issue will be continually on the Council agenda.**

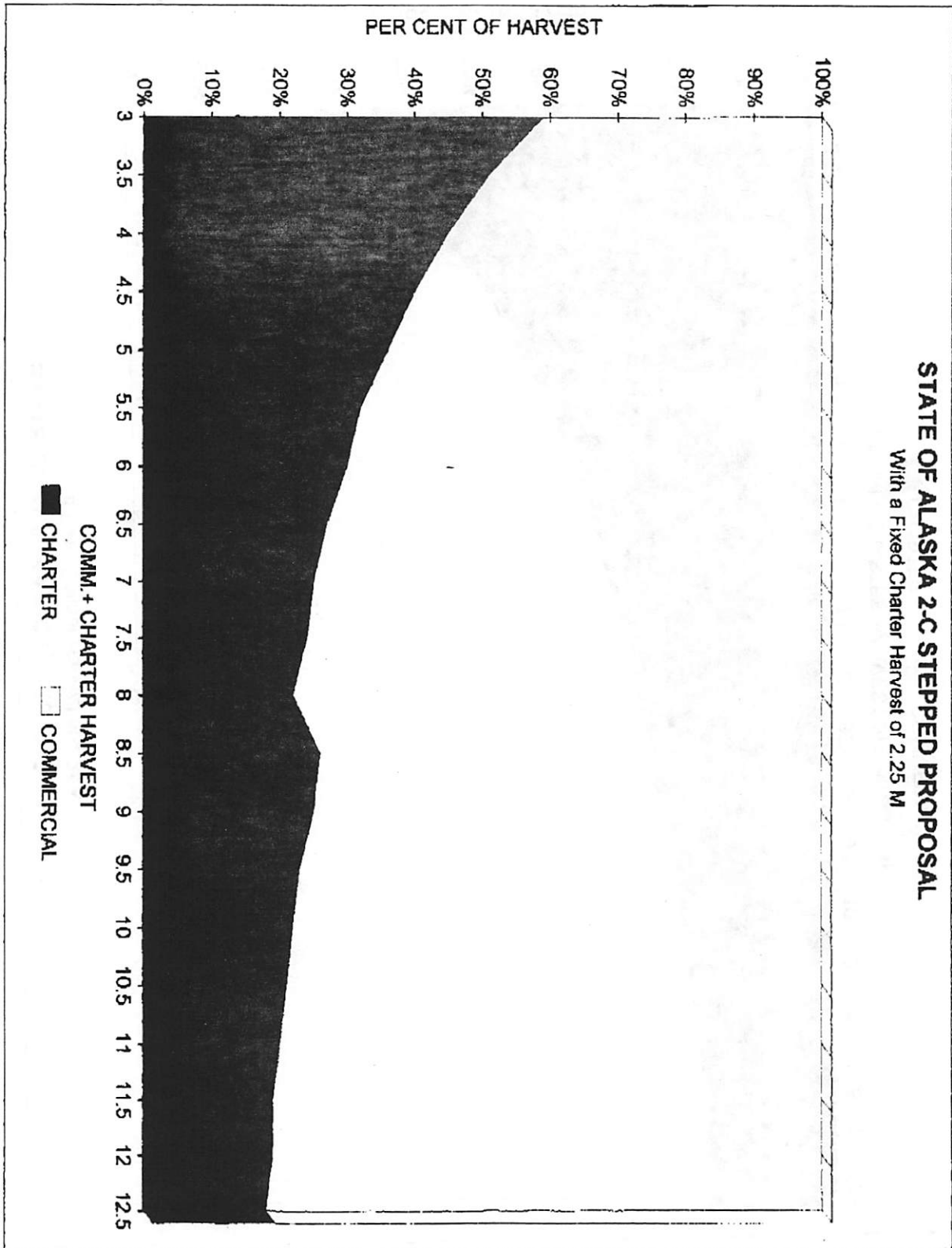
(11)

FIGURE 12



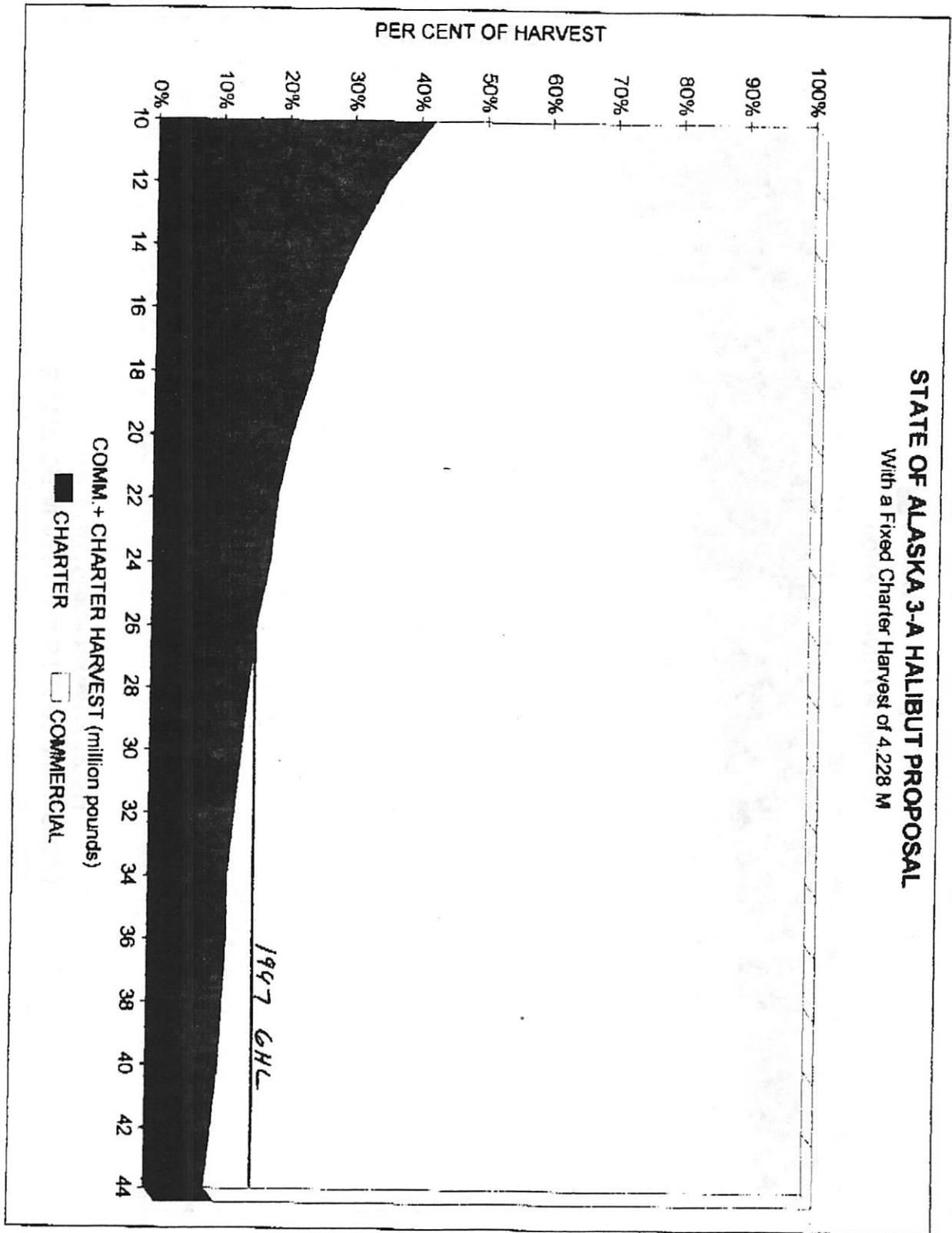
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FIGURE 13



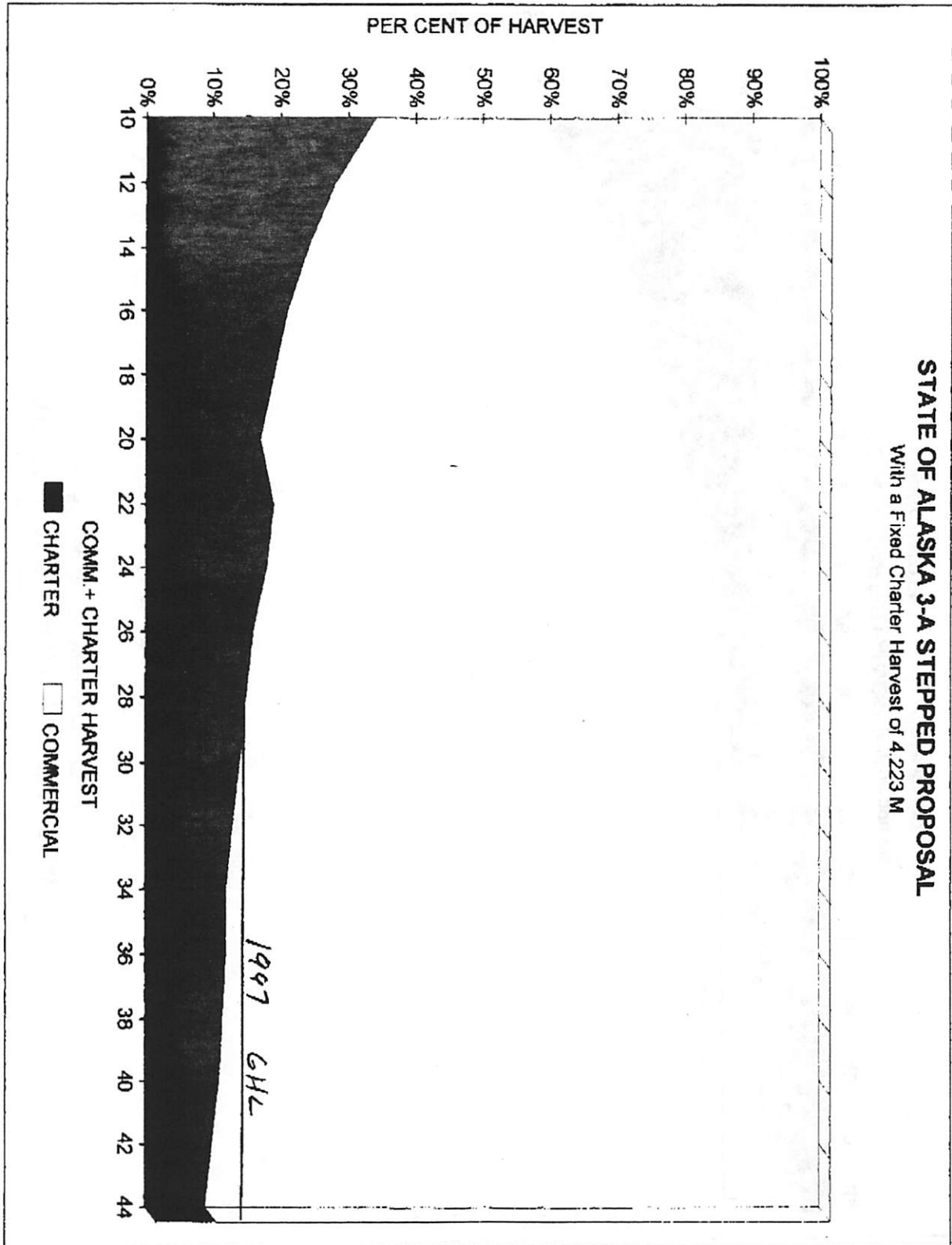
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FIGURE 14



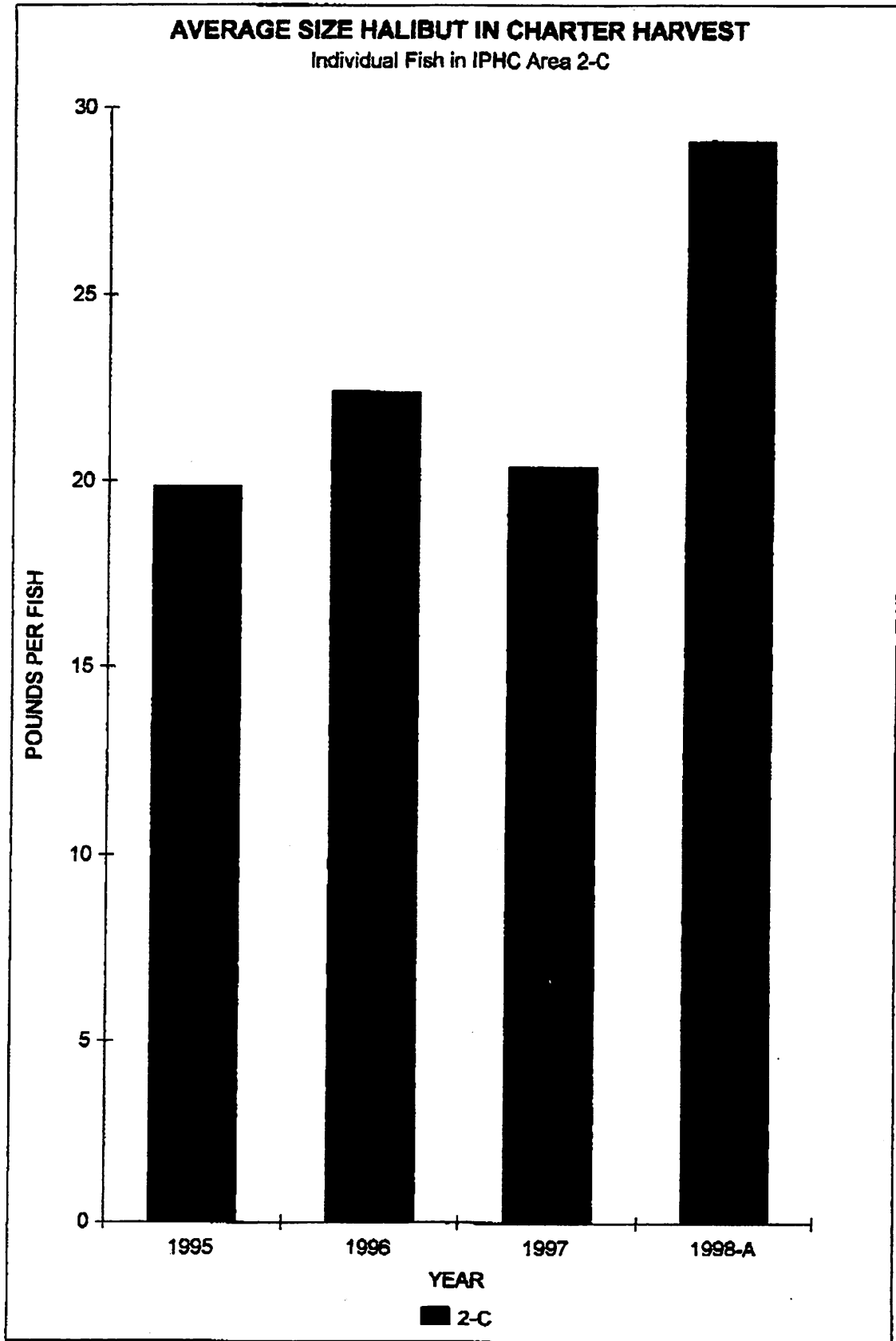
(14)

FIGURE 15



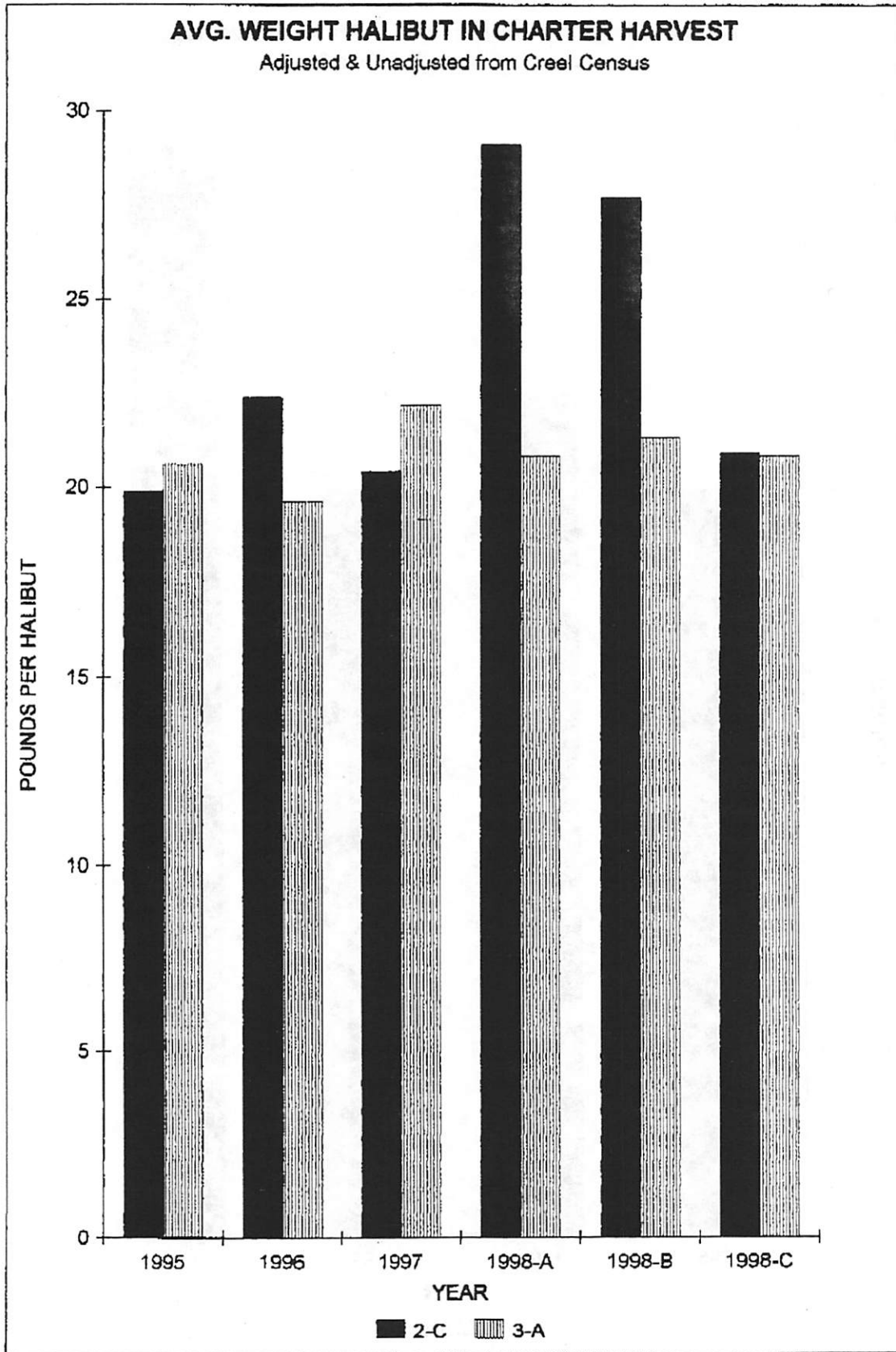
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Figure 16



(16)

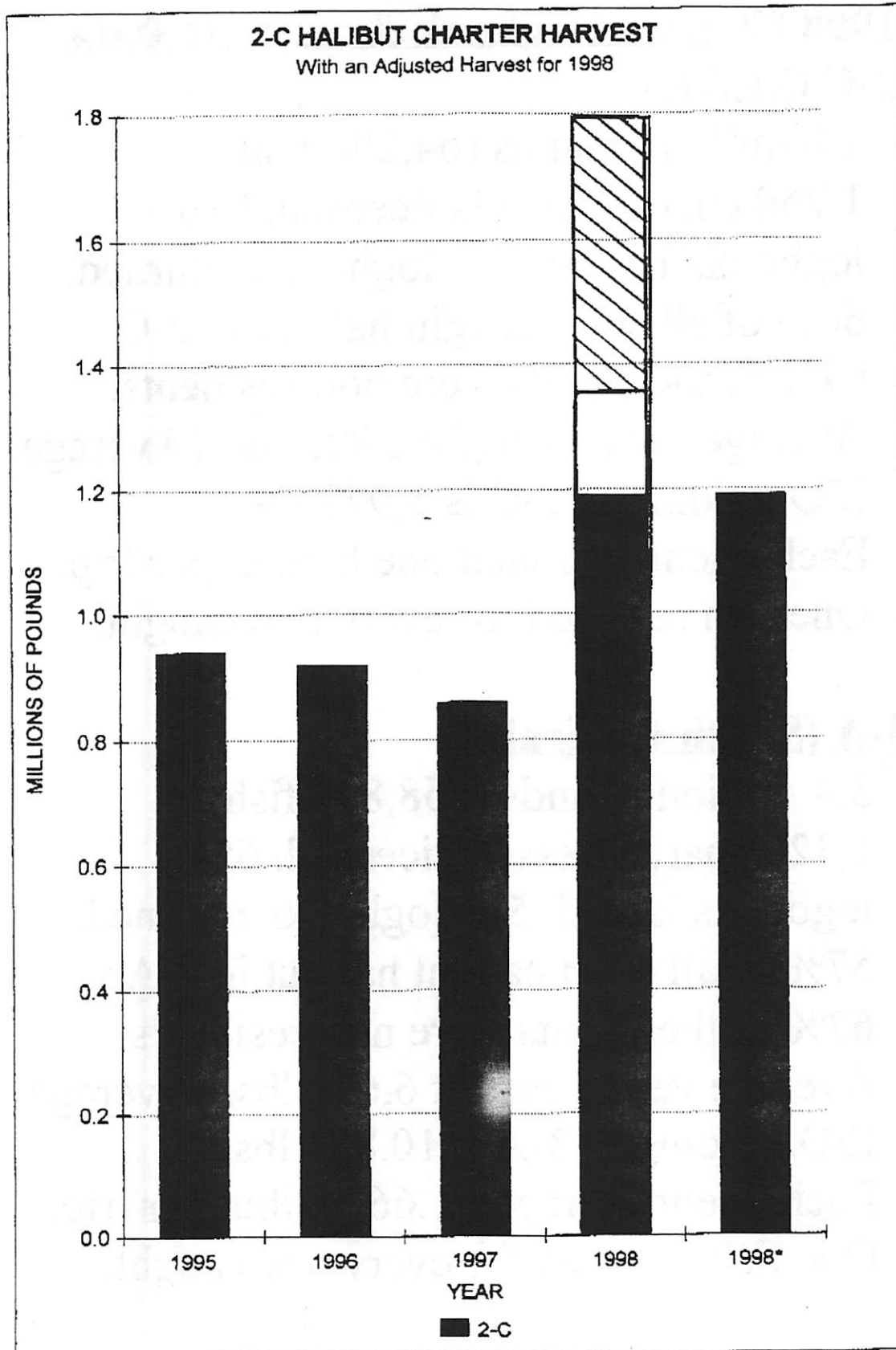
FIGURE 17



1998 A = LOGBOOK NUMBERS AND CREEL CENSUS - FEB/APRIL NPFMC  
 1998 B = LOGBOOK / STATEWIDE HARVEST SURVEY & CREEL CENSUS - OCT 99  
 1998 C = LOGBOOK / STATEWIDE HARVEST SURVEY PLUS AVG. WT. 1995-97

(17)

Figure 18



= WEIGHT GAIN IN 1998

= BLARNEY FACTOR (MINIMUM ESTIMATE)

(18)



71642K 19

## **1998 Charter Logbook & Harvest Data** **2-C (SEAK)**

- 1.8 million pounds (64,204 fish).
- 1,250 charter vessels licensed. 910 logbooks issued. 625 logbooks returned.
- 60% of all sport caught halibut in 2-C.
- 97% of the clients were non-residents.
- Average vessel caught 2,825 lbs. (Average IFQ holding in 2-C is 5,972 lbs.)
- Each client averaged one halibut per trip.
- One fish released for every two caught.

## **3-A (South Central)**

- 3.4 million pounds (158,890 fish).
- 1,320 charter vessels licensed. 655 logbooks issued. 518 logbooks returned.
- 57% of all sport caught halibut in 3-A.
- 67% of the clients were non-residents.
- Average vessel caught 6,637 lbs. (Average IFQ holding in 3-A = 10,883 lbs.)
- Each client averaged 1.66 halibut per trip.
- One fish released for every one caught.

Figure 20

## **IPHC Report on Incidental Catch and Mortality of Pacific Halibut: 1962 - 1998**

### **Bycatch Mortality**

**“Most of the decrease [in bycatch] is attributed to the introduction of Individual Fishing Quota (IFQs) in the Alaskan sablefish fishery...”**

**“Much of the bycatch mortality in Area 2-C has been eliminated with the introduction of IFQs in 1995.”**

# Petersburg Vessel Owners Association

P.O. Box 232

Petersburg, Alaska 99833

Phone (907) 772-9323 Fax (907) 772-4495

## Halibut Charter Catch: How Much Is Enough?

Two commercial groups, charter and longline, are competing for the same resource - halibut. Longliners have individual and overall annual catch limits. There are no such limits for the overall harvest by charter boats. At the December and February meetings of the North Pacific Fisheries Management Council, the NPFMC will be considering a Guideline Harvest Level (GHL) for the guided sport industry along with appropriate management measures. ADF&G Sportfish Division has a proposal that would give the half the quota to the charter fleet in years of low abundance.

**How does this effect commercial fishermen?** Every pound caught by a charter boat comes directly off the commercial TAC (Total Allowable Catch) in the following year. Any gain in economic activity in one sector is offset by losses in the other sector.

**Is there room for both industries?** Yes, but only with a GHL that places an upper limit on the charter catch. A reasonable GHL should be based on historic use and expressed as a percentage of the TAC. The allowable charter catch would then rise and fall with abundance as does the longline catch. This would level the playing field and provide long-term stability for the charter and longline industries.

**Is the playing field level in other aspects?** There is no raw fish tax on the charter harvest as there is on the longline harvest. There is no assessed fee to manage the charter fleet as does exist for the longline fleet (3% tax). There are no costs of purchasing IFQs or comparable permit fees for the charter fleet as exists for the longline fleet. In Petersburg, there is no sales tax on charters, though in a recent advisory vote, voters strongly urged that this exemption be dropped. All other exemptions were retained.

**Will the GHL limit unguided sport anglers?** No, the GHL is only being considered for guided anglers in IPHC areas 2-C & 3-A. In Southeast (2-C), 97% of the charter clients are non-residents. In 3-A, 67% of the charter clients are non-residents. In contrast, 85% of the commercial quota share in 2-C is held by Alaskans (source: ADF&G/CFEC).

**Is the charter catch significant?** The charter catch was 5.2 million pounds in 1998 (Areas 2-C & 3-A), a doubling since 1994. The largest increase occurred in Southeast (2-C), with a charter harvest of 1.8 million pounds in 1998, or twice the 1997 catch (source: ADF&G Sportfish). The 1998 charter catch data is questionable.

**What happens in the year when the charter fleet reaches the GHL?** Nothing. The original intent of the NPFMC was that no action would take place in-season in that year. Management measures would be implemented in the following year. The intent of the

NPFMC is to employ measures that would keep the charter fleet under the GHL while providing a stable season of historic length. Additionally the charter fleet would have pre-season knowledge of imminent management measures, prior to booking trips.

**What will the GHL be?** In 1997, the NPFMC passed a GHL that gave the charter fleet its largest catch to date (1995) plus an other 25% for growth, i.e. 125% of the 1995 catch. This was a reasonable compromise. In subsequent years, this poundage would be converted to a percentage of the resource, fluctuating with abundance. However, even though the GHL was published in the Federal Register, it is not in place at this time.

**Why isn't the GHL currently in place?** The National Marine Fisheries Service (NMFS) did not issue regulations for the GHL pending identification of specific management measures. The NPFMC then formed a committee of charter boat representatives to identify these management measures. After two years of meetings, the committee reported back to the NPFMC with very few meaningful management measures. The GHL committee stated that they did not want a GHL. The committee also adopted a proposal by ADF&G Sportfish Division that would allow the charter fleet to exceed the GHL. The Council is analyzing this proposal as well as the original GHL passed in 1997.

**What was the ADF&G Sportfish Division proposal?** Sportfish Division proposed a fixed harvest amount to the charter fleet. This fixed amount would not vary with abundance. In the years ahead of declining abundance (as forecast by the IPHC), the charter fleet would be increasing its harvest percentage. The burden of conservation would be solely on the longline fleet. In years of low abundance, the charter fleet would take half the quota. Additionally, Sportfish Division based its proposal on 125% of the 1998 charter catch, which is double the 1995 catch. Contrary to Sportfish Division's proposal, Governor Knowles has stated a firm commitment to abundance based management.

**What doubled the 1998 charter harvest in 2-C?** 1998 was the first year of self-reported logbook data from the charter fleet. Logbooks report the number of fish caught (as does the Statewide Harvest Survey). The average weight of the fish comes from the creel census. In 1998, the average halibut suddenly grew 37% from previous years but only in Area 2-C. This results in a 37% increase in charter catch poundage without any increase in the number of fish caught. However, the number of reported fish caught by charter boats also has increased, but there exists a discrepancy between the logbooks and the creel survey. Logbooks have inflated catch numbers up to 30% and an average of 11% higher than the creel survey. With these apparent inconsistencies in the 1998 data, it is problematic to advance a proposal based on the 1998 charter catch.

**Why is ADF&G Sportfish Division advocating for the charter fleet?** Good question. ADF&G normally remains neutral in all other fishery allocation issues. Sportfish Division has placed itself in the dubious position of advocating for the charter fleet while at the same time verifying and providing the data.

November 17, 1999

Chairman Richard Lauber  
North Pacific Fishery Management Council  
605 W. 4th Ave.  
Suite #306  
Anchorage, Alaska 99501-2252

RECEIVED  
NOV 18 1999  
M.P.

Form Letter submitted by the list attached.

Dear Chairman Lauber,

I am writing to you as an Alaskan resident and commercial fisherman. I am totally opposed to the halibut sport-charter industry getting a fixed poundage allocation. Let them figure out a solution within the existing 1997 agreement. The charter industry has had several years to prepare a solution to the problem many have seen coming. Their three point solution? Stall, don't share in conservation, take from someone else. Meanwhile, the commercial fleet has bought into a program the Council approved and the State has promoted. Contrary to popular belief, most of us were not made wealthy by a large windfall, but have mortgaged homes, boats, and property to buy into the IFQ program. The IFQ program cut commercial longline numbers by almost half. Initially, nobody got to catch what they were accustomed to catching. To be viable we had to buy in or get out. Fine, those of us that remain have accepted these painful and costly transitions. The charter business needs to make some tough decisions now also. I hope both yourself and the other Council members remember these points as you try to resolve the charter's problem.

Thank you,



R. Ohivas  
P.O. BOX 778  
HEMER AK 99603

Thank you,

J. R. Mink

Anna Borland-Luy

Jim Miewela

P.O. Box 2382

Homer, AK

99603

Thank you,

Collin S. MacCarty

MacCarty  
Box 109  
99603

Clay B. Moravee

Nov 17 - 1999

~~David Erik~~

404 Baranza Ave

Homer, AK

99603

Clay Moravee

PO Box 607

Homer Alaska

99603

Thank you,

Robert G. Naulty  
PO Box 2794  
Homer AK 99603

Thank you,

~~addw~~ <sup>TU</sup>  
Alexander N STUART III.  
His Catch Value added Products  
Box 770  
Homer AK 99603

Thank you,

Tom TEMPLE  
488 Elderberry  
HOMER AK  
99'603

Thomas W. [Signature]

Thank you,

[Signature]  
404 Bonanza Ave  
Homer, AK 99603

Thank you,

Collin S. Mac Carty

Mike Cost  
Box 109  
99603

Thank you,

Clay B. Morawe  
Nov 17 - 1999

Clay Morawe  
PO Box 607  
Homer Alaska  
99603

Thank you,

J. R. Miewela

Sin Miewela  
P.O. Box 2382  
Homer, AK.  
99603



RECEIVED  
NOV 23 1999

CHRIS CONDER  
POBOX 210954  
AUK BAY AK  
99821

Richard Lauber  
321 Highland Drive  
Juneau, Alaska 99801

N.P.F.M.C

Form Letter submitted by the list attached.

Dear Mr. Lauber:

I operate a sportfishing charter business in the Juneau area and am a member of the Juneau Charter Boat Operators Association (JCBOA). Our group has 40 members representing some 60 or so boats operating in our area. I am writing in opposition of the action taken by the North Pacific Fishery Management Council (NPFMC) which would place a harvest guideline (GHL) cap on the harvest of guided sport anglers.

The NPFMC is the only such management council in this country that has **NO** representation in voting seats from the recreational fisheries. This federally supported regulatory body which is dominated by commercial interests should not be involved in regulating (restricting) a small sport fishery that competes for the same public resource.

Alaska has 100,000 to 200,000 guided sport halibut anglers who take about 5 million pounds of fish annually, while Alaska's 3,700 commercial halibut IFQ holders take over 60 million pounds. Bycatch of halibut runs 12 to 14 million pounds annually and there are several million additional pounds of halibut wasted in conduct of commercial fisheries. Restricting or capping guided sport harvest of halibut should not even be considered until the sport harvest is at least equal to the commercial bycatch and wastage of this important Alaskan Sportfish.

Abundance-based management works in commercial fisheries where there are relatively few fishermen, each with a tremendous potential to harvest. However, in sport fisheries where you have hundreds of thousands of fishermen, each with a minute potential to harvest, such abundance-based management programs **DO NOT WORK**. Sportfisheries need stability and, in regard to Alaskan halibut, that equates to continuation of the existing bag limit which has been in existence for 25 years. That is the opportunity to catch two fish per day of any size per person. Sport anglers should not be expected to share the "pain" of decreased stock abundance (unless that abundance reaches the historic lows of the 70's) because sport anglers never had the opportunity to share the "gain" associated with increased abundance as did commercial harvesters. The sport halibut limit of two fish per person per day has been in existence for 25 years!

Given the high social and economic values of Alaska's guided halibut sportfishery and its low level of harvest, the only reasonable management plan is to continue the current plan. Simply subtract bycatch, commercial wastage, and projected sport harvest from total exploitable business and you have the amount available for commercial harvest. Local area management plans can be implemented to solve local issues.

Thank you for the opportunity to comment. Please put my name on your distribution list for information on this issue.

Respectively,



Doug Unruh  
Box 32214  
Juneau, AK 99803

Orea Enterprises  
PO Box 35431  
Juneau, Alaska 99803  
P(907)-789-6801  
888-733-ORCA (6722)  
Email: whales@ptialaska.net



Mike Belter  
PO Box 21080  
Auke Bay, AK 99821

Leanne Pilcher  
12020 Glacier Highway  
Juneau, AK 99801

**Chatham Strait Charters**  
**P.O. Box 210206**  
**Auke Bay**  
**Alaska 99821**

Tim Lemp  
PO Box 35621  
JUNEAU AK 99801



**KEITH & DEBBY STEPHENS**  
**PO Box 32083**  
**Juneau, AK 99803**



**Marvin H. & Sandra Walter**  
**1340 Fritz Cove Rd.**  
**Juneau, AK 99801-6808**

**RECEIVED**

T. Suss  
POB 211147  
AUKE BAY ALASKA  
99821

**Big Jim's Charters**  
**PO Box 210336**  
**Auke Bay, Alaska 99821**

*Wild Pad Charters*  
**MIKE & LILI KNIGHTLINGER**  
**PO Box 32505**  
**Juneau, AK 99803**

**AJ Charter Services**  
**1335 Mendenhall Peninsula Rd.**  
**Juneau, AK 99801**



**James R. Peters**  
**P.O. Box 33161**  
**Juneau, AK 99803-3161**

**INSIDE PASSAGE CHARTERS**  
**10006 CRAZY HORSE DR.**  
**JUNEAU, AK 99801**

3401 W. LAWTON ST  
SEA WA. 98199

RECEIVED

NOV 23 1999

N.P.F.M.C

October 29, 1999

Mr. Rick Lauber, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501-2252

Dear Chairman Lauber:

The following signatures represent crewmen, vessel owners, processing workers and others directly dependent on the IFQ fisheries in Alaska. The following individuals support a fair allocation between charter operators and commercial IFQ interests based on the historical landing history from each group. Additionally, the allocations to both user groups should float up and down (equally) with the rise and fall of resource abundance.

Jessy Thompson ACCOUNTANT SEA.WA,

Rita Adair IFQUOTA FISHERWOMAN

[Signature] IFQ FISHERMAN

[Signature] SEATTLE, WA insurance - PSVOA

[Signature] PSVOA ASVOA-EX DIRECTOR

Russell B. Flynn Marine Supply

[Signature] Quota Fisher

Peter Schonberg IFQ Fisherman

Matt Schulz IFQ Fisherman

Christopher Franklin IFQ Fisher

Howard Lawson  
Lynn Martin  
Michael A. Cisney  
Mary Cisney  
Denny Anthon  
Kierth Klackubajuk  
Leo S. Smeed  
Maxine Traversetti  
Leo Johnson  
Jack D. Annetson

John A. Kristovich  
John M. Kristovich  
Bernice Spry  
Edy Gagnia  
M. Lynn  
Art Lovelace  
Dennis Smith  
Dennis Johnson  
Patricia Hollander

William Miller (Nauticus Seafoods)

Nick Delaney Alaskan Leader Fisheries

~~John Wilson~~ NAUTICUS SEAFOODS, INC.

Lisa Ford - Nauticus SFS, Inc

~~John E. Delaney~~ NAUTICUS SEAFOODS, INC.

Alicia Delaney F/V Heritage

Nicole Delaney F/V Heritage

Meagan Delaney F/V Heritage

Nick Perovich F/V Restless C

Jim Prain F/V Restless C

Kim P. Smith  
Valerie Smith

Tom Martin  
Joy Martin

Robert Paoli

Kris Warbel

PAT BAKER

Mike Peterson  
Marshall C. Ross

Jan [unclear]  
Beverly [unclear]

Judd [unclear]

Tommy [unclear]

Calvin [unclear]

David [unclear]

Burger & Kuder

W. A. [unclear]

[unclear]

Carl [unclear]

Doris [unclear]

Connie Kennedy

Kay Hautanen

Nelson Hautanen

Nathan [unclear]

J. W. [unclear]

John [unclear]

Catherine [unclear]

Emeline [unclear]

Paula L. [unclear]

Gene [unclear]

[unclear]

Gary Cook

Pete Spivey FV MARTIN

STEVE GILLMAN

Kim Murray FV Kelsie K

Pat Ann FV Martin

Rocky Dadlowski FV Martin

~~Pat Ann~~  
~~Pat Ann~~  
Karl W. Kasken

Sonnes Murphy

Sue Gahr

Bruce L. Gery

Kurt Naetting

Voy Hall

David Allen

Juan Mitchell

EJ Taylor

Dean Adams, FV Quest

Patty Swapper

Arthur W. Hodges FV Ariza

William C. Sumner

Robert Caughie

Arne Fuglveg

David L. Munnick

MC Kingbaum

F.V. SEA PRIDE

F

Nichelle Gyo Eder

Dylan Eder

Sue Jansson

Maree Jangaard

MA Smith

Just L. Struff

Jenny Maden

John Mun

John Mun

Jett Munson

Jon S. Act

Nichelle Y. Beaver

~~Misha Ask~~

~~Matt H. DeS~~

Gloyd R. Coway

Gail W. Coway

Walter L. Coway

Angela Smith

Ronald A. Olson

Jennifer N. Young



Claire Connor

John McHenry Flu Seaman

Michael Brown

Ann Sullivan

in. E. Hall H.V. Argosy

Elaine Elyse

Alta Henry

Jim Rogers

Melley Kautz

MB Kautz

Antoinette C. Sneyden <sup>F/O</sup> Onaka

Bob [unclear]

George A. Wilson

Wayne Mitchell

John [unclear]

Jana Helen

Jeremy S Cook

Leslie [unclear]

Amida Lee

Maury



Slightly over 5,700 of these cards were received  
at the Council office.

Dear Mr. Lauber:

I purchased an Alaska Sportfishing license and fished for halibut out of  
PETERSBURG. It was a great experience and the expenditures  
I made to pursue this PUBLIC resource contributed substantially to local and state  
economies, especially given the small amount of resource taken. I sportfish not only for  
fun, but also for food for my family.

As a stakeholder and user of this PUBLIC fishery resource, I am concerned about the  
guideline harvest level (cap) proposals being considered for the guided sportfishery by  
the North Pacific Fishery Management Council. The commercial halibut fleet pur-  
suing this restriction takes over 60 million pounds annually while the guided sport  
fishery subject to this potential restriction takes only 3-4 million pounds. Further,  
13 million pounds of halibut are wasted annually as commercial bycatch.

Given the strength of the halibut resource and the small sport harvest, I am opposed  
to any proposals which would restrict the guided sport harvest of halibut at this  
time. These restrictive proposals are based only on economic allocation, which is in  
conflict with the Magnuson/Stevens Act.

I ask for your assistance in insuring that recreational angler access to this strong PUBLIC  
resource is not restricted only to provide a few more halibut for commercial harvest.

Respectfully,

William M. Zerkel

I SPORTFISH - I VOTE!

Mr. Oliver,

I had written to you earlier concerning the fact that, due to financial difficulties, I was unable to operate my charter boat business during the 1998 season and, therefore, never obtained a 1998 log book. Your response is above. I have since made my situation and feelings on this issue known to the council through letters as per your suggestion. To reiterate, I have been in operation since 1993 and have IPHC licenses for 1993, '94, '95, '96, and '97. I was forced to sell my boats in 1998 and did not operate that season as we were blessed with twin boys and our financial situation forced me to obtain full time employment in Anchorage. However, I fully intended to return to fishing when we were financially able to do so (1999 or 2000). Through the urging of NPFMC staff members that I talked to on the phone I have returned to charter boat fishing as fast as I could and purchased a new boat (the "Alasking 1") and moved my family to Homer; not without some financial stress. After finishing preparational work on my boat, I was able to operate full time during the 1999 season and have submitted a 1999 log book. The net outcome of this is that I have missed one season since 1993 - the "key" season of 1998. Of course, had I known that my continued participation in the fishery may depend on operating at least one week in 1998 I would have made sure that happened. Sir, I have a history in this fishery and am currently fully vested in the fishery. The Halibut GHJ Discussion Paper states that there are many grey areas yet to be encountered as far qualification criteria for the fishery. I believe my situation is one of those grey areas. Basing qualification on just one season's data is unfair and in my opinion very inaccurate. Only by collecting data for several seasons can one obtain accurate, statistically useful data concerning the actual participation and growth rate of the industry. Were not the commercial IFQs based on data from multiple seasons? At any rate, I would appreciate any information as soon as it is available on the appeals process if that route becomes necessary for me. Also, are there any discussions of government financial assistance for people that are shut out of the fishery similar to government assistance for commercial fishermen when their fisheries are shutdown or cut short? I am currently poised and ready to operate during the 2000 season. Please let me know if you believe that there is anything else I should be doing, or any one else I should contact to insure my future place in the fishery.

Thankyou for your time,

Captain Mike Field  
Alasking Charters

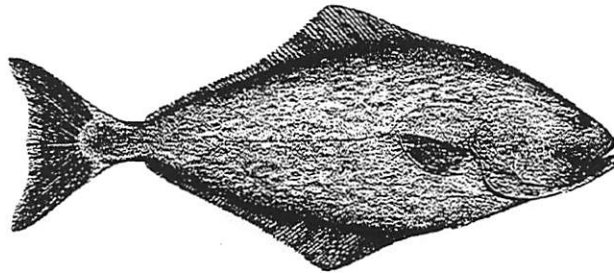
**DRAFT FOR COUNCIL REVIEW**

**ENVIRONMENTAL ASSESSMENT/REGULATORY IMPACT REVIEW**

**OF**

**A REGULATORY AMENDMENT**

**TO REVISE HALIBUT POSSESSION LIMITS**



prepared by

Staff

North Pacific Fishery Management Council

September 11, 1997

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## EXECUTIVE SUMMARY

The Council has initiated this analysis to review the halibut possession limits for Alaska as a result of three requests: (1) a proposal submitted by the Alaska Longline Fishermen in 1993 to limit the guided halibut sport fishery and is an offshoot management action to proposed action to limit the halibut charterboat fishery; (2) a letter submitted by the Valdez Charterboat Association to the International Pacific Halibut Commission to increase the guided and non-guided sportfish bag limit for Pacific halibut from the current 2 fish per day and 4 fish in possession, to 3 fish per day and 6 in possession to allow the sport fishery to mirror the 36% increase in harvests projected for the 1997 commercial fishery; and (3) a motion by the Council representative from the State of Washington to revise the federal possession limit language to mirror revisions to Washington State regulations and IPHC regulations for landings 'on land.'

Critical to the Council's review of this management issue is an understanding that policy as well as regulations are being requested to be reexamined. National Marine Fisheries Service Enforcement Division, Alaska Department of Fish and Game and Department of Public Safety, Division of Fish and Wildlife Protection have found the current halibut possession limit to be unenforceable since federal policy on 'possession' is not clearly defined. If the Council intends the possession limit to extend until an angler has transported the harvested fish to the primary residence, the regulations describing 'possession' need to be revised under Alternative 2. If the Council intends that the current or potentially revised possession limits apply on land as well as at sea, a recommendation to the IPHC to revise the regulations needs to be approved under Alternative 2. And lastly, if the Council intends that multiple possession limits are legal, it may intend to limit those harvests under an annual possession limit under Alternative 3. ADFG survey data indicate that 43% of anglers harvested two or fewer halibut each year between 1990-95, and 73% harvested four or fewer. Without examining the costs associated with an angler's willingness to pay to harvest additional fish, the 4-fish possession limit appears to satisfy nearly ¾ of all sport halibut anglers.

The management alternatives are listed below:

Alternative 1. Status quo. Do not revise halibut possession limits in Alaska.

Alternative 2. (a) Redefine the current possession limit of two daily bag limits to require that the possession limit is in effect until all affected halibut are processed at the angler's place of permanent residence.  
(b) Redefine halibut possession limits such that they also apply on land adjacent to federal waters off Alaska.

Alternative 3. Redefine the halibut possession limit per angler per year to not exceed:  
a) 4 fish;  
b) 6 fish;  
c) 8 fish;  
d) 10 fish; or  
e) 12 fish.

The North Pacific Fishery Management Council is considering management alternatives to revise halibut possession limits in Alaska. This document is the Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) for a regulatory amendment to make such a revision. The National Environmental Policy Act (NEPA), Executive Order (E.O.) 12866, and the Regulatory Flexibility Act (RFA) require a description of the purpose and need for the proposed action as well as a description of alternative actions which may address the problem. Section 2 contains a discussion of the environmental impacts of the alternatives. Section 3 contains a Regulatory Impact Review (RIR) which addresses the requirements of both E.O. 12866 and the RFA that economic impacts of the alternatives be considered.

Initial review of this EA/RIR is scheduled for September 1997. Final action to adopt such changes is scheduled for December 1997.

### 1.1 Management Background

The domestic fishery for halibut in and off Alaska is managed by the International Pacific Halibut Commission (IPHC) as provided by the "Convention Between the United States and Canada for the Preservation of the Halibut Fishery of the Northern Pacific Ocean and the Bering Sea" (Convention) signed at Washington March 29, 1979, and the Northern Pacific Halibut Act of 1982 (Halibut Act), P.L. 97-176, 16 U.S.C. 773 c (c). The Convention and the Halibut Act authorize the respective North Pacific Fishery Management Council (Council) established by the Magnuson-Stevens Act to develop regulations governing the Pacific halibut catch in U.S. waters which are in addition to but not in conflict with regulations of the International Pacific Halibut Commission.

The IPHC is responsible for conducting biological assessments of the halibut resource and setting catch limits to protect the resource and maximize yield in the Bering Sea, Aleutian Islands, and Gulf of Alaska. The North Pacific Fishery Management Council has the responsibility of allocating fishing privileges among U.S. fishermen. McCaughran and Hoag (1992) provide a discussion of management authority of the IPHC and the Council relating to halibut.

The Council does not have a fishery management plan (FMP) for halibut, however, the Council developed a limited access system involving individual fishing quotas (IFQs) and community development quotas (CDQs) for the halibut fishery. This system is implemented by federal regulations under 50 CFR part 679, Limited Access Management of Fisheries off Alaska under authority of the Magnuson Fishery Conservation and Management Act of 1975, P. L. 94-265, 16 U.S.C. 1801. Federal regulations implemented under the Halibut Act can be found at 50 CFR part 300, subpart E, Pacific Halibut Fisheries.

The Council has received three requests to examine this management issue. In September 1993, the Council's Halibut Regulatory Amendment Advisory Group (RAAG) reviewed a proposal submitted to the Council from the Alaska Longline Fishermen's Association (ALFA) to limit the guided halibut sport fishery. Their justification was that the growth in the charter industry had reduced the amount of halibut available to the directed commercial fishery. The RAAG recommended that the Council proceed with an analysis of five management alternatives: (1) status quo; (2) license limitation; (3) individual fishing quotas for charter boats; (4) capping charter boat landings to recent harvest levels; and (5) limiting charter landings with traditional management measures, such as restricting the size of fish caught, seasons, daily bag limits, or possession limits. Alternatives 1- 4 are included in the EA/RIR/IRFA for limiting the halibut charter boat fishery, which is scheduled for final action in September 1997. RAAG Alternative 5 is included in this EA/RIR.

In its January 1994 minutes, the Halibut Charter Working Group also recommended that the Council evaluate an individual annual limit (4 to 12 halibut per fisherman per year) for all recreational halibut fishermen (whether guided or not), and the legality of restricting the amount of recreationally caught halibut that can be exported out-

of-state. The meeting minutes also reported, "[T]he sport and charter representatives made a major concession when they agreed to request that the Council analyze individual harvest limits for all recreational users."

Secondly, an industry proposal was also submitted to the IPHC for its January 1997 meeting; it was referred to the Council in February 1997. The Valdez Charter Boat Association proposal recommended an increase in the guided and non-guided sportfish bag limit for Pacific halibut from the current 2 fish per day and 4 fish in possession, to 3 fish per day and 6 in possession (Appendix I).

Thirdly, at its February 1997 meeting, the Washington State Council representative made the motion to reinitiate development of this EA/RIR to mirror changes to the State's possession limit regulations and Area 2A federal halibut regulations that added possession limits for 'on land' as well as at sea.

The Council is also scheduled for final action on two other halibut allocation issues: (1) Sitka Sound local area halibut management plan in September 1997, and (2) subsistence/personal use fishery in February 1998.

## 1.2 Purpose and Need for Action

As a complement proposed actions for halibut charter fishery management and local area plans, in February 1997 the Council initiated an analysis of halibut possession limits in coastal waters off Alaska. Enforcement of federal and state possession limit regulations have been stymied since the possession limit is not clearly specified in federal (or state) regulation and may warrant clarification. Current regulations may be interpreted to allow unlimited export of frozen halibut by sport anglers. The Council discussed the need for a potential revision in federal halibut fishing regulations on possession limits. In general, possession limits are intended to restrict the number of halibut trips that sport anglers may take so that the harvest is better distributed among sport users.

The lack of clarity in the current federal regulation regarding the duration of the possession limit has allowed anglers to take multiple possession limits of sportfish while camping, boating, vacationing at private lodges or cabins, etc. Those who have access to these types of vehicles, boats, or buildings may gain from an unequal sharing of the resource. Many anglers transport these sport-caught fish to their primary residence for private consumption, but some also sell or market fish from private residences or campers while traveling. The Council is reviewing current possession limit regulations to determine if this aspect of the halibut fishery results in waste of the public resource, with social and economic implications on users abiding within single possession limits. The Council needs to balance the rights of anglers to keep a fair share of the resource and a "fish hog" mentality with regards to the resource.

## 1.3 Current State and Federal Regulations

In all waters off Alaska (IPHC Areas 2C through 4E), the halibut sport fishing season runs from February 1 through December 31, although halibut abundance, seasonal tourism, and weather have restricted chartering to May through September. The daily bag limit is two halibut of any size per day per person. The State of Alaska also has imposed a 6-line limit for charter boats in Southeast Alaska (Area 2C) since 1984 to prevent 'headboats' from relocating from the Lower 48. The State further limits possession, "such that sport-caught fish, their parts, and articles manufactured from such fish may be possessed within the state by any person at any time, and may be transported within and exported out of the state by any person at any time." State of Alaska regulations for halibut apply to at-sea and on land.

The State of Alaska definition of "possession" of sport-caught fish means that sport-caught fish, their parts, and articles manufactured from such fish may be possessed within the state by any person at any time, and may be transported within and exported out of the state by any person at any time, except that no person may possess any unprocessed fish, or part of one, not legally taken by himself. The term "processed" means that halibut must be: cooked, canned, smoked, salted (minimum salting of 20% of the weight of the fish, drying, or freezing.

"Preserved" means 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, and does not include unfrozen fish temporarily stored in coolers that contain ice, dry ice, or fish that are lightly salted.

In all waters off British Columbia (IPHC Area 2B), the season also runs from February 1 - December 31. The daily bag limit is two halibut of any size per day per person. The possession limit is three halibut and is applicable to an individual angler for his/her entire trip, regardless of its length, and nationality of the angler. Under the North Pacific Halibut Treaty Act of 1982, Canada and the United States have a reciprocal sportfishing agreement.

**NOAA General Counsel Alaska Regional Office staff has suggested that halibut possession limits off Alaska may not have the force of law on land and may be enforceable only at-sea.** Possession limits implemented through the Area 2A (Washington, Oregon, and California) catch sharing plan are implemented for land and sea (FR 12759). The Pacific Fishery Management Council and IPHC revised the Area 2A possession limits for 1996 to resolve regulatory discrepancies between Pacific Coast states and the IPHC. The Council adopted a measure that would ensure a consistent application of possession limits in the subareas north and south of Cape Falcon, Washington. These possession limits apply to all halibut possessed, regardless of the condition of the fish (e.g., frozen, fresh).

The Area 2A CSP regulations (Federal Register March 18, 1997, Vol. 62, No. 52, pp. 12759-12767) report the following possession limits for Alaska through California:

- (7) The possession limit for halibut in the waters off the coast of Alaska is two daily bag limits.
- (8) The possession limit for halibut in the waters off the coast of British Columbia is three halibut.
- (9) The possession limit for halibut in the waters off the coast of Washington, Oregon, and California is the same as the daily bag limit.
- (10) The possession limit for halibut on land in Area 2A north of Cape Falcon, OR is two daily bag limits.
- (11) The possession limit for halibut on land in Area 2A south of Cape Falcon, OR is one daily bag limit.

Note that the Pacific Council sets a direct allocation to halibut sport anglers and possession limits are intended in this case to better distribute the allocation among sport anglers and allow for longer seasons because the quota would not be achieved as quickly (Scordino, pers. commun.). An allocation to the halibut guided charter fishery is under final review by the North Pacific Council at its September 1997 meeting.

The Washington Fish and Wildlife Commission has initiated a regulatory action to revise the Pacific Council's Area 2A catch sharing plan to revise the possession limit language. The Pacific Council will recommend that the IPHC consider adopting complementary federal regulations for 1998. Possession limits restrict the amount of fish an angler may have in possession while in transit or in the field. The Commission recently adopted new definitions. In-the-field means anywhere other than an ordinary residence. Dockside fish cleaning facilities, boat ramps, and cold storage lockers are "in-the-field." Ordinary residence means an ordinary residential dwelling where a person normally lives, with associated features such as address, telephone number, utility account, etc. A motor home or camper parked at a campsite are not considered to be an ordinary residence.

In all waters off California, Oregon, and Washington, all sport fishing is managed on a 'port of landing' basis. The daily bag limit for these areas is one halibut per day per person. Washington Department of Fish and Wildlife (WDFW) seasons and minimum size limits for 13 sport fish management areas are listed in Table 1. WDFW possession limits for halibut is two daily limits in any form, except only one limit while aboard a vessel. Oregon Department of Fish and Wildlife regulations limit an angler to one halibut > 32 inches per day when fishing north of Cape Falcon. The bag limit is one halibut > 32 inches and one halibut > 50 inches for south of Cape Falcon to the California boundary. The Oregon halibut possession limit is equal to one daily bag limit. In the area off the California coast, the fishing season runs May 1 through September 30. The daily bag limit is one halibut > 32 inches.



Table 1. 1997 Washington Department of Fish and Wildlife Regulations for Pacific Halibut

Marine Area	Season	Minimum Size	Daily Limit	Additional Rules
Ilwaco	May 1-Sep 30	32"	1	Season may close early if quota is taken.
Westport - Ocean Shores	May 1-Sep 30	None	1	Season may close early if quota is taken
LaPush	May 1-quota July 1-quota	None None	1 1	Closed on Sundays and Mondays. Note closure area.
Neah Bay east of Bonilla-Tatoosh west of Bonilla-Tatoosh	May 22-Aug 10 May 1-quota July 1-quota	None None None	1 1 1	Note special area closure. Closed on Tue/Wed Closed on Sun/Mon Closed on Sun/Mon
Sekiui & Pillar Point	May 22-Aug 10	None	1	Closed on Tues/Weds
East Juan de Fuca Strait	May 22-Aug 10	None	1	Closed on Tues/Weds
San Juan Islands	May 22-Aug 10	None	1	Closed on Tues/Weds
Deception Pass, Hope Island, & Skagit Bay	May 22-Aug 10	None	1	Closed on Tues/Weds
Port Susan & Port Gardner	May 22-Aug 10	None	1	Closed on Tues/Weds
Admiralty Inlet	May 22-Aug 10	None	1	Closed on Tues/Weds
Seattle/Bremerton Area	May 22-Aug 10	None	1	Closed on Tues/Weds
Tacoma-Vashon Island	May 22-Aug 10	None	1	Closed on Tues/Weds
Hood Canal	May 22-Aug 10	None	1	Closed on Tues/Weds
South Puget Sound	May 22-Aug 10	None	1	Closed on Tues/Weds

#### 1.4 Description of the Fishery

The halibut fishery is subdivided into ten IPHC regulatory areas (Figure 1). The 1995 halibut sportfish harvest of 1,759,000 lb declined about 12% from 1994 in Southeast Alaska (Area 2C). Sport halibut harvests in Area 2C had been relatively stable at around 70,000 fish from 1989 through 1992, but increased regional harvests since 1993 were due primarily to increases in sport effort and harvests in the Prince of Wales area (Beers and Suchanek 1996). A harvest of 91,778 halibut set a new record, indicating a decrease in the average size of fish (Table 2). Average weight ranged from a high of 26.9 lb in Sitka to a low of 14.2 lb in Ketchikan.

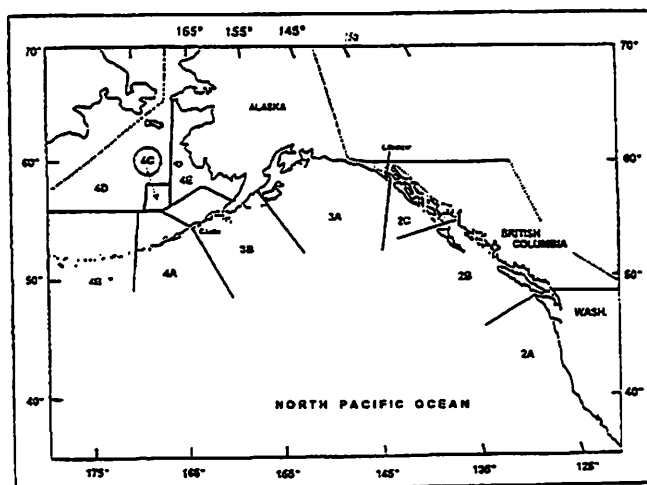


Figure 1. Regulatory areas for the Pacific halibut fishery.

Since 1991, harvests in outer coastal waters have been higher than those in inside waters (Juneau, Ketchikan, Petersburg/Wrangell, and Haines/Skagway). Outside water harvests appeared to level out and inside waters harvests increased in 1996. Overall harvest-per-unit-effort and average size of halibut in the Juneau, Ketchikan, and Petersburg/Wrangell areas have been stable or increasing in recent years, perhaps suggesting good survival of recent recruits into the fishery. Juneau stocks may be improving and recovering from a low seen in 1993. Compared to previous five year averages, the Ketchikan halibut fishery is growing, with bottom fish effort redistributed at Cape Chacon at the southern tip of Prince of Wales Island and to the west shore of Duke Island. Total effort and harvest by the halibut charter boat fleet in the Ketchikan area were well above average in 1995.

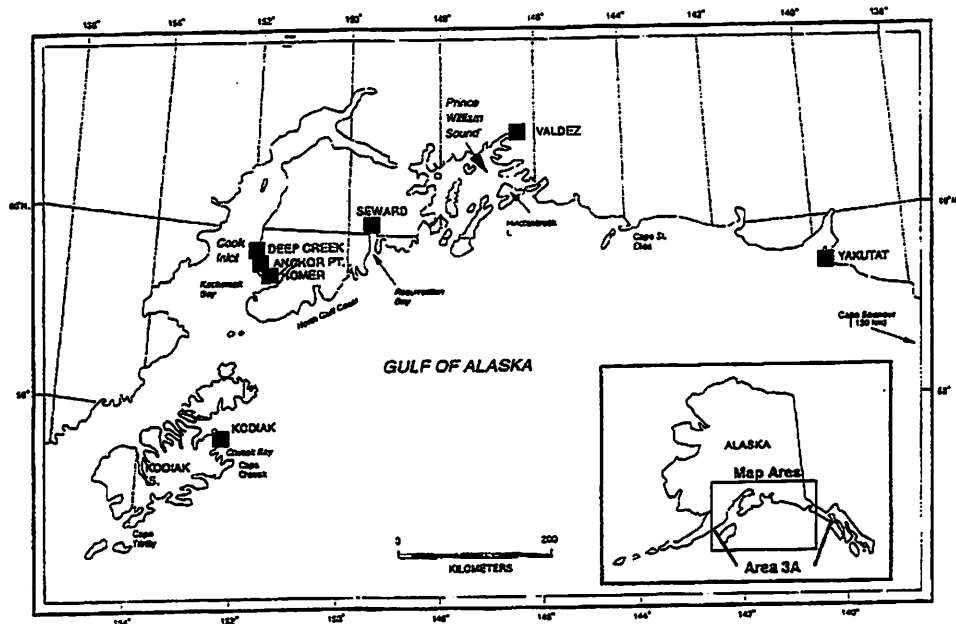
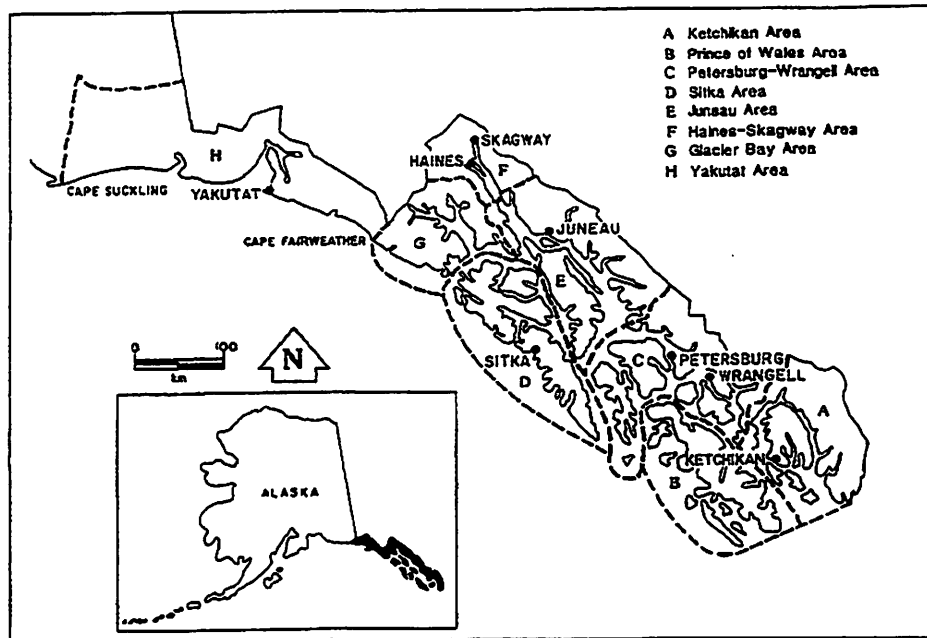


Figure 2. Primary ports for the recreational Pacific halibut fishery in IPHC Regulatory Area 2C (above) and Area 3A (below).

Craig anglers enjoy some of the best halibut fishing in the southeastern region and it appears the halibut sport fishery is continuing to grow. A limited creel survey monitoring effort in the Petersburg/Wrangell area suggests a consistent but slowly developing charter effort is growing. Part of this growth may be attributed to below average spring sport fishing for chinook salmon in 1995 (from Blood 1996).

Chartered anglers continue to take a larger percentage of the harvest, particularly in Sitka and Craig where catch rates of chartered anglers are three times higher than for non-chartered anglers (from Beers and Suchanek 1996). Creel surveys indicate that Juneau and Sitka anglers continue to travel further from normal fishing grounds to maintain high halibut catch rates (from Blood 1996).

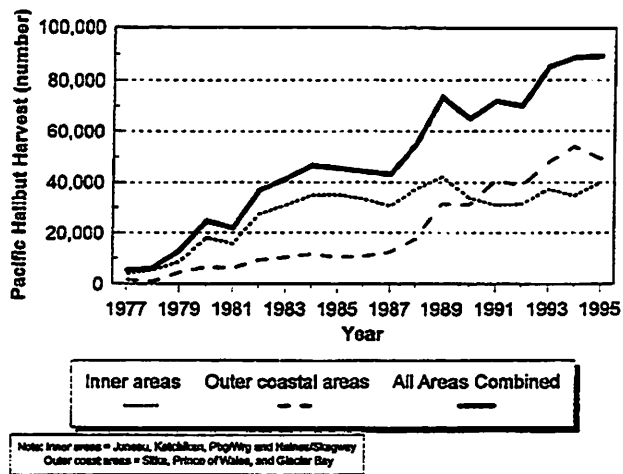


Figure 3a. Estimated recreational harvests of halibut in Area 2C from 1977-95 (Beers and Suchanek 1996).

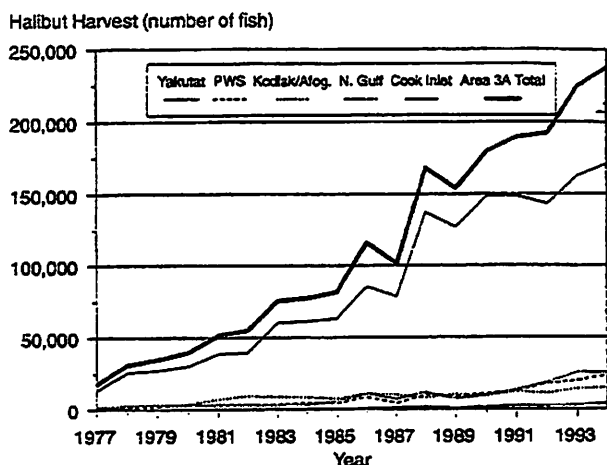


Figure 3b. Estimated recreational halibut harvest in Area 3A, 1977-1994 (Mills 1979- 94, Howe et al. 1995).

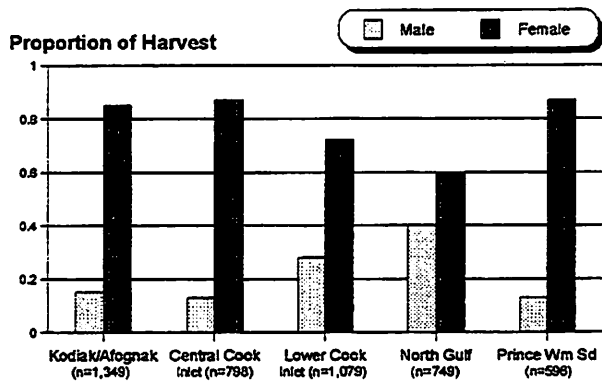


Figure 4. Estimated sex composition, by subarea, of the 1994 Area 3A recreational halibut harvest.

The Southcentral Alaska (Area 3A) 1995 halibut harvest was nearly identical to 1994 levels in numbers of fish (233,389) and weight (4,488,000 lb). Average weight increased from 18.9 in 1994 to 19.3 lb in 1995. The mean weight varied from a high of 27.5 lb in Kodiak to a low of 15.5 lb in central Cook Inlet. The 1988 and 1987 year classes continued to dominate the fishery in 1995 and ranged from 30 to 53% of the catch in numbers. As in Southeast Alaska, anglers continue to travel longer distances from the major ports to maintain acceptable catch rates. The lower Cook Inlet area, where Homer is the major port, has had a fairly stable harvest since the late 1980s. A developing fishery in central Cook Inlet in recent years has likely intercepted some of the Homer-bound fishermen. This diversion typically takes place at Deep Creek, some 40 minutes closer to Anchorage than Homer and offers combination trips for halibut and king salmon, shorter boat rides to the fishing grounds, and more half-day charters (from Blood 1996).

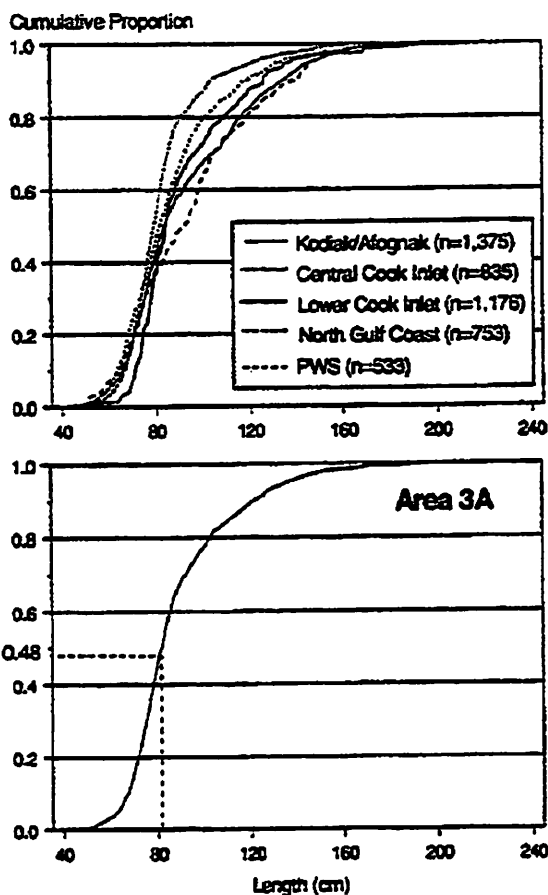


Figure 5. Estimated length composition of the 1994 recreational halibut harvest in each subarea (upper graph) and all of Area 3A (lower graph).

**Table 2 Alaska sport Pacific halibut harvests, 1985-1995, and catch, 1995, by region and area.**

Area Fished	Harvest											Catch 1995
	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	
<b>Southeast</b>												
Ketchikan	12,600	11,014	9,676	11,544	13,699	9,872	9,733	9,455	12,763	15,313	14,483	22,231
Prince of Wales Island	3,073	2,902	2,760	2,778	9,213	10,264	11,875	11,661	22,501	24,465	20,808	31,313
Kake, Petersburg, Wrangell, Stikino	4,757	3,624	3,039	3,877	5,548	5,768	6,433	6,153	5,984	7,992	9,488	15,291
Sitka	6,091	6,617	7,545	10,572	17,727	17,492	20,283	22,092	19,366	23,701	21,452	35,842
Juneau	16,695	16,574	14,382	18,697	20,273	16,248	13,637	14,850	16,340	10,362	15,145	25,838
Haines-Skegway	1,023	2,189	3,567	3,201	2,588	1,972	1,199	926	2,195	1,058	856	905
Glacier Bay	1,355	1,331	2,184	4,238	4,484	3,415	8,766	4,863	5,878	5,849	7,090	13,511
Yakutat	520	777	1,194	1,673	772	1,459	2,112	1,861	2,752	3,577	2,456	3,411
<b>Total</b>	<b>46,114</b>	<b>45,028</b>	<b>44,347</b>	<b>56,580</b>	<b>74,304</b>	<b>66,490</b>	<b>74,038</b>	<b>71,861</b>	<b>87,779</b>	<b>92,317</b>	<b>91,778</b>	<b>148,342</b>
<b>Southcentral</b>												
Glennallen	0	0	0	0	0	0	0	0	0	0	0	0
Prince William Sound	4,527	8,331	4,379	9,845	8,697	10,851	12,733	17,855	19,716	23,487	24,771	43,246
Knik Arm Drainage	0	0	0	0	0	0	0	0	0	0	0	0
Anchorage	0	0	0	0	0	0	0	0	0	0	0	0
East Susitna River Drainage	0	0	0	0	0	0	0	0	0	0	0	0
West Cook Inlet-W Susitna River Drainages	510	1,072	869	1,192	1,224	1,685	1,576	984	2,507	2,725	3,236	6,173
Kenai Peninsula	68,582	94,479	84,733	147,756	132,944	156,353	160,888	160,705	185,431	193,085	188,597	359,248
Kodiak	7,303	10,960	9,869	7,749	10,435	9,134	12,089	10,860	14,169	14,910	13,989	27,598
Naknek River Drainage-Alaska Peninsula	536	1,015	1,596	1,984	1,412	2,545	5,199	2,643	3,491	2,402	2,796	5,728
Kvichak River Drainage	0	0	0	0	0	0	0	0	0	0	0	0
Nushagak	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>81,458</b>	<b>115,857</b>	<b>101,446</b>	<b>168,526</b>	<b>154,712</b>	<b>180,568</b>	<b>192,485</b>	<b>193,049</b>	<b>225,314</b>	<b>236,609</b>	<b>233,389</b>	<b>441,993</b>
<b>Arctic-Yukon-Kuskokwim</b>												
Tanana River Drainage	0	0	0	0	0	0	0	0	0	0	0	0
Kuskokwim River Drainage	62	0	36	0	0	144	0	33	54	45	21	53
Seward Peninsula-Norton Sound	0	0	0	0	0	0	0	0	0	75	0	0
Northwest Alaska	0	0	0	0	0	0	0	0	0	0	0	0
Yukon River Drainage	0	0	0	0	0	0	0	0	0	0	0	0
North Slope Brooks Range	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>62</b>	<b>0</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>144</b>	<b>0</b>	<b>33</b>	<b>54</b>	<b>120</b>	<b>21</b>	<b>53</b>
<b>Alaska Total</b>	<b>127,634</b>	<b>160,885</b>	<b>145,829</b>	<b>225,106</b>	<b>229,016</b>	<b>247,202</b>	<b>266,523</b>	<b>264,943</b>	<b>313,147</b>	<b>329,046</b>	<b>325,188</b>	<b>590,388</b>

Area 3A ports (Kodiak, Homer, Deep Creek, Anchor Point, Seward, and Valdez) accounted for nearly 75% of the number of all halibut harvested by recreational anglers in 1995, with the Kenai Peninsula representing over 80% of Area 3A landings (Table 2). The 1993 Area 3A harvest accounted for about 60% by weight of the recreational harvest on the west coast of North America (Blood 1994). Anglers in Southeast Alaska (Area 2C), with recreational fishing ports in Ketchikan, Petersburg, Sitka, and Juneau, harvested nearly all of the remaining 25% of halibut in 1995 (from Meyer 1996).

A steady increase in estimated recreational halibut harvest for Area 3A subareas is depicted in Figure 3b. Harvests approached 250,000 fish in 1994. Mean lengths and weights for the same subareas are listed in Tables 7 and 8; the largest halibut occur in the Kodiak area. Between 60% (North Gulf) and 87% (Prince William Sound) of the harvest were females (Figure 4). About 48% of the recreational harvest was under the 32 inch commercial minimum size (Figure 5).

The 1995 Area 3B halibut harvest is small (16,000 lb) and concentrated at Sand Point and Popof Strait. The Area 4 harvest declined by over 20% in 1995 (41,000 lb), but reflects the separation of Area 3B harvest for the first time in 1995. The harvest is primarily from Dutch Harbor, which has produced a few halibut over 400 lb, and Adak. A 20.3 lb average weight derived from length data provided from military charters on Adak was used to extrapolate the catch in pounds for both Area 3B and Area 4 (from Blood 1996).

### 1.5 Management Action Alternatives

#### Alternative 1. Status Quo. Do not revise halibut possession limits in Alaska.

The status quo alternative would not offer any additional protection to the social and economic interests of users of the halibut resource. As halibut sport anglers are not exceeding the limits of current regulations due to their ambiguity, the Council may determine that possession limits are not being exceeded and do not need to be revised.

- Alternative 2. (a) Redefine the current possession limit of two daily bag limits to require that the possession limit is in effect until all affected halibut are processed at the angler's place of permanent residence.
- (b) Redefine halibut possession limits such that they also apply on land adjacent to federal waters off Alaska.

Alternative 2 would further define "possession" and "processed" in federal regulation in terms of halibut transported to the angler's place of permanent residence. The State of Alaska definition of "possession" of sport-caught fish means that sport-caught fish, their parts, and articles manufactured from such fish may be possessed within the state by any person at any time, and may be transported within and exported out of the state by any person at any time, except that no person may possess any unpreserved fish, or part of one, not legally taken by himself. The term "processed" means that halibut must be: cooked, canned, smoked, salted (minimum salting of 20% of the weight of the fish, drying, or freezing. "Preserved" means 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, and does not include unfrozen fish temporarily stored in coolers that contain ice, dry ice, or fish that are lightly salted.

Current IPHC regulations on possession limits for halibut harvested in Alaska are unclear. Current regulations stipulate only that the possession limit on the water is the same as two daily bag limits and do not address possession limits on land. Enforcement by federal and state fisheries agencies are problematic as a result.

In 1995, the Pacific Council recommended modifying the federal regulations at 50 CFR 301.21(h) for Area 2A so that the IPHC regulations on the water were matched by a complementary possession limit on land. The Area 2A possession limit on land was intended to restrict the number of halibut trips that a sport fisherman can make so that the sport allocation is better distributed among sport users and would allow for longer seasons because the quotas would not be taken as quickly. Prior to 1995, the halibut possession limit in Area 2A was equal to the daily bag limit. Halibut possession limits differed from possession limits for other species in Washington

where it excluded fish in a frozen or processed state. In Oregon, the possession limit was one bag limit regardless of the condition of the fish. However, fish in a permanent residence were excluded from the possession limit. In California, the possession limit is identical to the bag limit, without qualifications as to the condition or location of the catch. Thus, all three states did (and continue to have) different possession limits with Oregon and Washington possession limits differing from those of the IPHC (PFMC, 1995).

The Pacific Council considered and rejected modifying the IPHC possession regulations so that fish in a processed form do not count as part of the possession limit. It also rejected adopting a change that would match IPHC regulations for Alaska which define the possession limit as two daily bag limits. The Council approved a measure that ensured a consistent application of possession limits in the subareas north and south of Cape Falcon. These possession limits apply to all halibut regardless of the condition of the fish (e.g., frozen, fresh, etc.) and were chosen to mirror those in state regulations. The Area 2A possession regulations are listed in Section 1.3.

Alternative 3. Redefine the halibut possession limit per angler per year to not exceed:

- a) 4 fish;
- b) 6 fish;
- c) 8 fish;
- d) 10 fish; or
- e) 12 fish.

Alternative 3 would redefine the halibut possession limit to be a certain number of halibut (between 4 and 12) that an individual may possess in a calendar year. The current possession limit is four halibut, however, the time period for which the possession is intended is unspecified. The Council's Halibut Charter Working Group, in its January 1994 minutes, recommended that the Council evaluate and examine an individual annual limit and reporting system for all recreational halibut fishermen. Charter industry representatives on the working group suggested analyzing limits of 8, 10, and 12 halibut per year.

This alternative would require purchase of either a punch card or stamp, as required for king salmon, whereby an angler must punch his card and/or sign his fishing license at the point of landing. The bag limit would remain at two halibut per angler per day.

## 2.0 NEPA REQUIREMENTS: ENVIRONMENTAL IMPACTS OF THE ALTERNATIVES

An environmental assessment (EA) is required by the National Environmental Policy Act of 1969 (NEPA) to determine whether the action considered will result in significant impact on the human environment. If the action is determined not to be significant based on an analysis of relevant considerations, the EA and resulting finding of no significant impact (FONSI) would be the final environmental documents required by NEPA. An environmental impact statement (EIS) must be prepared for major Federal actions significantly affecting the human environment.

An EA must include a brief discussion of the need for the proposal, the alternatives considered, the environmental impacts of the proposed action and the alternatives, and a list of document preparers. The purpose and alternatives are discussed in Section 1. Section 2 contains a discussion of the environmental impacts of the alternatives. Section 3 contains the RIR. Section 6 contains the summary and conclusions of the analysis. The preparer is listed in Section 7.

The environmental impacts generally associated with fishery management actions are effects resulting from (1) harvest of fish stocks which may result in changes in food availability to predators and scavengers, changes in the population structure of target fish stocks, and changes in the marine ecosystem community structure; (2) changes in the physical and biological structure of the marine environment as a result of fishing practices, e.g., effects of gear use and fish processing discards; and (3) entanglement/entrapment of non-target organisms in active or inactive fishing gear.

None of the proposed alternatives would have a significant impacts on the environment.

## 2.1 Impacts on Endangered or Threatened Species

Endangered and threatened species under the ESA that may be present in the Gulf of Alaska and the Bering Sea and Aleutians Islands include:

### Endangered

Northern right whale	<i>Balaena glacialis</i>
Sei whale	<i>Balaenoptera borealis</i>
Blue whale	<i>Balaenoptera musculus</i>
Fin whale	<i>Balaenoptera physalus</i>
Humpback whale	<i>Megaptera novaeangliae</i>
Sperm whale	<i>Physeter macrocephalus</i>
Snake River sockeye salmon	<i>Oncorhynchus nerka</i>
Short-tailed albatross	<i>Diomedea albatrus</i>
Steller sea lions (western stock)	<i>Eumetopias jubatus</i>

### Threatened

Steller sea lion	-	<i>Eumetopias jubatus</i>
Snake River spring and summer chinook salmon		<i>Oncorhynchus tshawytscha</i>
Snake River fall chinook salmon		<i>Oncorhynchus tshawytscha</i>
Spectacled eider		<i>Somateria fischeri</i>

None of the management alternatives is expected to have an effect on endangered or threatened species for the same reasons cited above.

## 2.2 Finding of No Significant Impact

None of the alternatives negatively impacts the halibut population in Alaska. Alternatives 2 and 3 proposes to redefine the halibut possession limit in Alaska to enhance enforcement of the current four halibut limit. A slight reduction in the number of sport-caught halibut is expected under either of the two proposed alternatives.

None of the alternatives is likely to significantly affect the quality of the human environment; preparation of an environmental impact statement for selection of any of the alternatives as the proposed action would not be required by Section 102(2)(C) of the National Environmental Policy Act or its implementing regulations.

## 3.0 REGULATORY IMPACT REVIEW

This section provides information about the economic and socioeconomic impacts of the alternatives including identification of the individuals or groups that may be affected by the action, the nature of these impacts, and quantification of the economic impacts where possible.

The requirements for all regulatory actions specified in E.O. 12866 are summarized in the following statement from the order:

In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to

consider. Further, in choosing among alternative regulatory approaches, agencies should select those approaches that maximize net benefits (including potential economic, environment, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.

This section also addresses the requirements of both E.O. 12866 and the Regulatory Flexibility Act to provide adequate information to determine whether an action is "significant" under E.O. 12866 or will result in "significant" impacts on small entities under the RFA.

E.O. 12866 requires that the Office of Management and Budget review proposed regulatory programs that are considered to be "significant." A "significant regulatory action" is one that is likely to:

- (1) Have an annual effect on the economy of \$100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal governments or communities;
- (2) Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;
- (3) Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or
- (4) Raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in this Executive Order.

A regulatory program is "economically significant" if it is likely to result in the effects described above. The RIR is designed to provide information to determine whether the proposed regulation is likely to be "economically significant."

The proposed action would revise the possession limits for halibut in the guided and unguided sport fishery.

### 3.1 Economic and Social Impacts of the Alternatives

**Alternative 1. Status Quo. Do not revise halibut possession limits in Alaska.**

The status quo alternative would have no social and economic impact on the halibut resource or its users. This alternative would allow the continued harvest under current regulations that have been deemed unenforceable by federal and state enforcement agencies.

**Alternative 2.** (a) Redefine the current possession limit of two daily bag limits to require that the possession limit is in effect until all affected halibut are processed at the angler's place of permanent residence.  
(b) Redefine halibut possession limits such that they also apply on land adjacent to federal waters off Alaska.

Possession of sport-caught fish means that sport-caught fish, their parts, and articles manufactured from such fish may be possessed within the state by any person at any time, and may be transported within and exported out of the state by any person at any time, except that no person may possess any unpreserved fish, or part of one, not legally taken by himself. No person may possess halibut that were not legally taken. Additionally, until brought to shore and offloaded, no person may fillet, mutilate, or otherwise disfigure a halibut in any manner that prevents the determination of the number of fish caught or possessed.

The term "processed" would mean that halibut must be: cooked, canned, smoked, salted (minimum salting of 20% of the weight of the fish, drying, or freezing. "Preserved" fish means 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, and does not include unfrozen fish temporarily stored in coolers that contain ice, dry ice, or fish that are lightly salted. The preceding language is modeled after State of Alaska regulations.

Alternative 2 attempts to clarify the intent of the current halibut possession limits. Some halibut fishermen may misunderstand or flagrantly ignore the intent of the current possession limit that halibut may not be retained above the possession limit until such halibut are processed as stated above at their place of permanent residence.

Under this alternative, anglers may not possess more than four halibut that are not processed and stored at their place of permanent residence. This requirement would be aimed at preventing all anglers (local Alaskans, guided tourists, guests of private lodges, etc.) from exceeding the four fish limit during any one trip away from their place of permanent residence.

Alternative 3. Redefine the halibut possession limit per angler per year to not exceed:

- a) 4 fish;
- b) 6 fish;
- c) 8 fish;
- d) 10 fish; or
- e) 12 fish.

Alternative 3 proposes to redefine the halibut possession limit to a certain number of halibut (between 4 and 12) that an individual may possess in a calendar year. Alternative 3 would require receipt or purchase of either a punch card or "halibut conservation stamp," as required for king salmon, whereby an angler must punch his card or sign his/her license immediately at the point of landing. A halibut angler may be required to return his/her properly filled out permit report by the due date, even if he/she did not fish for halibut. Persons not returning the completed report may not be issued a permit the following year. Note that lower annual limits may result in increased highgrading.

An analysis of ADFG mail survey information for 1990-95 indicated that 43% of households of anglers take two or fewer halibut per angler per year, and 73% take four or fewer (Figure 6). The percent of angler households reporting halibut decreases as the number of fish increases, such that only 4% of households reported harvesting more than 11 halibut per angler. Harvests are reported for resident and nonresident anglers (Table 3). Since most anglers comply with the current legal bag limit of two halibut each day, it is unknown how harvests may be affected if anglers are limited under an annual cap. The 2-fish daily bag limit would still apply

Figure 6. Number of anglers harvesting "x" halibut

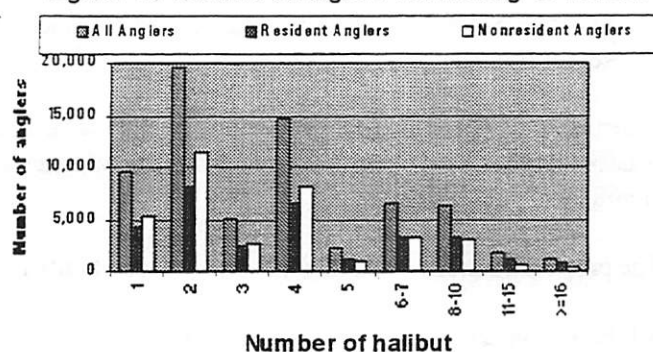


Table 3. Number of halibut per angler, 1990-95

No. of Halibut	All Anglers	%	Resident Anglers	Nonresident Anglers
1	9,534	14.2	4,220	5,314
2	19,529	29.1	8,170	11,360
3	5,057	7.5	2,469	2,588
4	14,789	22	6,573	8,216
5	2,289	3.4	1,257	1,032
6-7	6,566	9.8	3,345	3,221
8-10	6,426	9.6	3,364	3,062
11-15	1,758	2.6	1,218	541
>=16	1,152	1.7	843	309
Total	67,100		31,458	35,642

While there is a strong element of recreational enjoyment to sport fishing, many fishermen also 'sport' fish for halibut to feed their families. There are no federal allowances for subsistence or personal use fisheries for Pacific

halibut, although the Council will be considering creation of a 'food fishery' category for rural residents in February 1998. Current sport fish data include harvests taken for recreational, subsistence, and personal use purposes. Data presented in Table 5.3 in the EA/RIR for Creating and Defining a Halibut Subsistence/Personal Use Fishery Category (1997) indicates an average consumption of 17.6 lb of halibut per rural resident. Subarea consumption rates vary (2A - 26 lb; 3A - 14.5 lb; 3B - 22.5 lb; Area 4A-D - 44.5 lb; and Area 4E - 3.3 lb). Assuming consumption rates based on the needs of rural residents and that an angler is feeding a family of four, the current four fish possession limit appears to be adequate (average of 30 lb in Area 2C and 19.3 lb in Area 3A). Note that the status quo is not an annual limit, and that multiple possession limits may be retained so long as the harvests fish are transported to the angler's primary residence, thereby allowing greater opportunity for the 4 fish possession limit to meet the needs of anglers to feed their families. It is not likely that non-resident anglers who incur the expense of traveling to Alaska to sport fish are reliant on those fish to feed their families.

### 3.2 Other Management Alternatives

Other management alternatives may also be considered by the Council for limiting halibut possession and maximizing yield to the fishery. The following are not considered management alternatives at this time but have been discussed by the HAAG and working group in the past. The Council may find merit in some or all of the following management tools.

#### 3.2.1 Minimum Size

Since 1973, the IPHC has set a coast-wide minimum size limit of 32 inches (81 cm) for commercial halibut. The size limit was based on a study by Myhre (1974), who calculated yield per recruit for various ages of recruitment to the commercial fishery assuming a release mortality rate in the range of 0.2-0.4. Clark and Parma (1995) reaffirmed the appropriateness of the 32 inch minimum size and are planning to reanalyze the minimum size in context with an observed reduction in halibut growth and a shift of the maturity schedule to smaller sizes in 1997.

The following discussion of the commercial minimum size for halibut is taken from Clark and Parma (1995). There is currently no minimum size in the sport halibut fishery, except off Oregon. Fish less than the commercial minimum size account for about half the sport caught fish by number, but only about a quarter of the weight coast-wide. In some areas, however, the sport catch consists mostly of small fish.

Hooking mortality of halibut released by anglers and length selectivity of the sport fishery has been estimated to be quite similar to that in the commercial fishery. Few fish under 60 cm occur in the sport catch, with the mode around 80 cm, and large fish are well-represented. Therefore, the estimation of halibut landed in the sport fishery is similar to that in the commercial fishery.

The discard mortality rate used in 1995 was 16% in all areas and was based on the bycatch discard mortality observations in 1992 and 1993 in the BSAI sablefish hook and line fishery where the pace of fishing is similar to quota fisheries (IPHC 1996). The 1997 DMR for the GOA sablefish longline fishery is 27%. The amount of sublegal halibut caught in the commercial fishery was estimated from the catch ratio of sublegal to legal pounds from the survey data (IPHC 1996). The ratio of sublegal to legal for Area 4 was estimated from setline surveys between 1989 and 1994. Sublegal mortality was estimated to be 5% in Area 4 for 1995. The recommended rates for 1998 are 16% for the BSAI and 24% for the GOA sablefish longline fisheries.

IPHC staff determined that yield-per-recruit from the sport fishery was slightly higher than that in the commercial fishery in Area 2B and was no different in Area 3A. Spawning biomass per recruit was also unaffected by removing the size limit. On this basis, IPHC staff reported that there was no reason to impose a minimum size on the sport fishery.

Establishing a minimum size could still be considered by the Council for the guided and unguided halibut sport fishery, either matching the commercial minimum size or choosing another. Its effect, however, would be allocative instead of conservative. For example, length frequency data indicate that a 32-inch minimum size limit

for sport caught halibut could reduce the number of halibut harvested in Southcentral Alaska by up to 30%. A minimum size for guided fishermen only would reduce the number of halibut harvested by up to 15%. Impacts of minimum size limits would differ among ports, with Seward having the largest reductions (as of 1993). Impacts would be greater for military charters and non-guided anglers in private boats which traditionally retain smaller sized halibut. Harvest reductions would depend on the extent that fishermen are able to recover potential losses by catching and retaining halibut over the minimum size. A minimum size would likely result in highgrading, with an increase the mean weight of sport-caught halibut and the total pounds of halibut landed by the sport harvest (Vincent-Lang and Meyer 1993).

Another size limit option would be to allow the retention of one halibut of any size plus a second halibut of a larger minimum size (e.g., 40 inches or other size chosen by the Council).

### 3.2.2 Maximum Size

The IPHC staff has considered a maximum size and slot size for halibut in the past. IPHC staff comments on this issue follow (R. Trumble, pers. commun.). Female halibut mature at about age 12, 3-4 years after they recruit to the fishery. The current halibut fishery, including sport and commercial catch, harvests lots of large fish, and therefore removes a large amount of spawning potential. The IPHC compensates for the heavy harvest of females and their lost spawning potential by lowering the exploitation rate (the proportion of exploitable biomass allowed for harvest). A maximum size limit of 130-140 cm would shift more harvest to males, allow more egg production, and probably let us raise the exploitation rate. However, a maximum size limit would make biological and management sense only if applied to both sport and commercial fisheries on a coast-wide basis. Bringing large halibut on board a commercial vessel to measure them causes serious injury that would offset and possibly reverse the benefits of release.

There is no biological reason for requiring the release of large halibut. However, many fishermen prefer to release them, and the IPHC started a tagging program in 1994 at the request of the sport charter industry. Reasons for releasing large halibut vary considerably with individual fishermen. Some want to release halibut to avoid wasting fish that won't be eaten, or because the large fish are females that release millions of eggs. Others like to participate in the tagging program to help provide more information on halibut. The IPHC tagging program is completely voluntary. Over 90% of halibut carefully released by sport fishermen survive.

### 3.2.3 Bag limits

The Council may also wish to consider redefining the bag limit restriction to be the first two halibut caught by an angler. This would reduce the instances of highgrading on charter vessels. In 1993, the RAAG recommended that the Council consider reducing the bag limit to one halibut per person per day. A one fish bag limit could reduce landings by up to 40%, assuming a harvest rate of 1.7 halibut per angler per trip. Harvest reductions will depend on the number of fishermen who will hire a charter for only one halibut. A one fish limit is likely to reduce the number of customers willing to pay for a charter, adversely impacting the charter industry from a reduction in charters or by shifting effort to other species (e.g., salmon, rockfish). Possession limits less than twice the bag limit may impact those charter operations offering overnight or multi-day charters.

In 1997, the IPHC forwarded to the Council a proposal submitted by the Valdez Charter Boat Association to raise the halibut guided and non-guided sport fish bag and possession limits to 3 fish per day and 6 fish in possession. Its justification for the proposal was to allow the sport fishery to mirror the 36% increase in harvests projected for the 1997 commercial fishery. The Association further suggested that commercial fishing practices are resulting in smaller halibut in the sport fishery, reducing the yield of halibut taken home by the general public. An increase of one fish to the bag limit would increase the halibut harvests and have a positive economic effect on charter revenue. The effects of reducing the bag limit to one fish are discussed by Meyer (1994).

**Table 4 Statewide and regional participation in Alaska sport fishing by residency, 1991-1995.**

Region	1991					1992				
	Residents of Alaska		Nonresidents of Alaska		Total	Residents of Alaska		Nonresidents of Alaska		Total
	Number	Percent	Number	Percent		Number	Percent	Number	Percent	
<b>Anglers</b>										
SE <sup>a</sup>	37,018	39.8	55,896	60.2	92,914	36,835	37.8	60,616	62.2	97,451
SC <sup>b</sup>	199,225	62.5	119,639	37.5	318,864	198,034	62	121,316	38	319,350
AYK <sup>c</sup>	38,237	82.4	8,189	17.6	46,426	34,328	80.6	8,264	19.4	42,592
TOTAL	252,116	59.3	172,909	40.7	425,025	246,108	57.4	182,660	42.6	428,768
<b>Days Fished</b>										
SE <sup>a</sup>	251,954	55.5	202,397	44.5	454,351	247,014	52.7	221,578	47.3	468,592
SC <sup>b</sup>	1,270,319	71.3	511,736	28.7	1,782,055	1,364,454	72.2	525,476	27.8	1,889,930
AYK <sup>c</sup>	190,772	86.7	29,150	13.3	219,922	156,924	86.3	24,928	13.7	181,852
TOTAL	1,713,045	69.7	743,283	30.3	2,456,328	1,768,392	69.6	771,982	30.4	2,540,374
<b>1993</b>										
Region	Residents of Alaska		Nonresidents of Alaska		Total	Residents of Alaska		Nonresidents of Alaska		Total
	Number	Percent	Number	Percent		Number	Percent	Number	Percent	
<b>Anglers</b>										
SE <sup>a</sup>	35,320	36.6	61,152	63.4	96,472	36,041	31.5	78,198	68.5	114,239
SC <sup>b</sup>	194,313	59.5	132,405	40.5	326,718	193,054	57.6	141,841	42.4	334,895
AYK <sup>c</sup>	33,802	76.8	10,202	23.2	44,004	33,102	78.0	9,346	22.0	42,448
TOTAL	237,452	55.7	189,062	44.3	426,514	241,438	52.5	218,766	47.5	460,204
<b>Days Fished</b>										
SE <sup>a</sup>	258,612	54.9	212,591	45.1	471,203	259,109	47.7	283,830	52.3	542,939
SC <sup>b</sup>	1,301,567	69.7	565,666	30.3	1,867,233	1,318,825	67.0	648,160	33.0	1,966,985
AYK <sup>c</sup>	187,973	85.1	32,999	14.9	220,972	176,627	84.1	33,360	15.9	209,987
TOTAL	1,748,152	68.3	811,256	31.7	2,559,408	1,754,561	64.5	965,350	35.5	2,719,911
<b>1995</b>										
Region	Residents of Alaska		Nonresidents of Alaska		Total					
	Number	Percent	Number	Percent						
<b>Anglers</b>										
SE <sup>a</sup>	36,001	33.3	71,958	66.7	107,959					
SC <sup>b</sup>	187,452	54.7	155,374	45.3	342,826					
AYK <sup>c</sup>	41,181	76.0	13,003	24.0	54,184					
TOTAL	240,566	51.2	228,870	48.8	469,436					
<b>Days Fished</b>										
SE <sup>a</sup>	271,069	51.0	260,921	49.0	531,990					
SC <sup>b</sup>	1,308,126	65.9	677,413	34.1	1,985,539					
AYK <sup>c</sup>	222,720	82.4	47,421	17.6	270,141					
TOTAL	1,801,915	64.6	985,755	35.4	2,787,670					

<sup>a</sup> Southeast

<sup>b</sup> Southcentral

<sup>c</sup> Arctic-Yukon-Kuskokwim

### 3.2.4 Export limits

The Council and its Halibut Charter Working Group has also discussed using export limits to limit the amount of halibut shipped out of the State of Alaska. NOAA General Counsel has advised that there is no compelling justification to discriminate against fishermen who want to ship lawfully landed halibut from Alaska to other states or countries. Such regulations raise problems regarding equal protection provided under the 14th Amendment to the U.S. Constitution, as well as the North Pacific Halibut Act which prohibits the discrimination between residents of different states. NOAA GC has suggested that regulations be imposed to address problems at the harvesting stage, rather than regulating the distribution of lawfully harvested fish, and imposes marking regulations on all fish and wildlife (including those taken legally) shipped out of state (January 1994 minutes of the Halibut Charter Working Group).

### 3.3 Identification of the Individuals or Groups that may be Affected by the Proposed Action

Of more than 469,000 sportfish anglers in 1995, 51% of were Alaska residents and 49% were nonresidents (Figure 7). The number of anglers who fished specifically for halibut is unknown. More than 73% of anglers fished in Southcentral Alaska (Area 3A) (Table 4). More than 71% of days fished also occurred there. A total of 298 charter vessels were considered active in Area 2C in 1996 (Beers and Suchanek 1996). Of the 298, 193 (65%) targeted halibut. Nearly all vessels targeted both halibut and salmon.

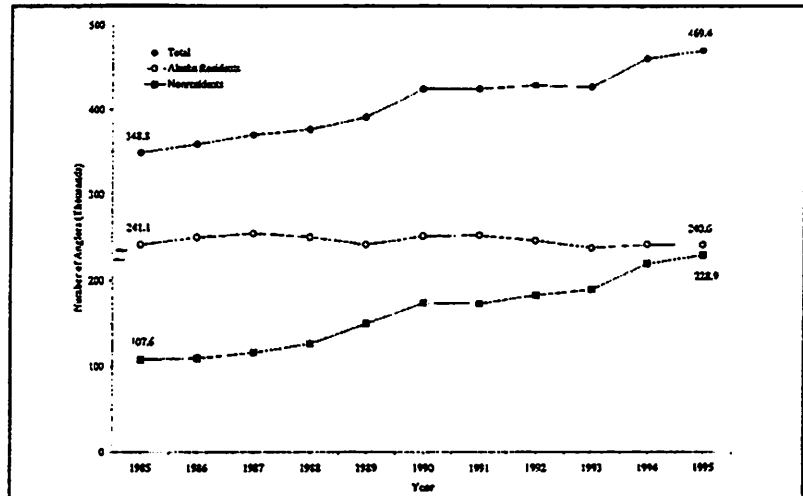


Figure 7. Anglers who sport fished in Alaska by area of residence, 1985-95.

### 3.4 Economic and Social Impacts of Proposed Action

The growing recreational halibut fishery is of vital economic importance to the region. Halibut fishing draws vast numbers of tourists and local derbies raise money for community projects and organizations (Denny 1990). In 1986, anglers spent \$18.5 million in southcentral Alaska in pursuit of halibut and indicated a willingness to pay an additional \$25 million to ensure the continued availability of halibut fishing opportunity (Jones and Stokes 1987). Charter boats are the primary means of providing access to the fishery for residents and nonresidents, and most coastal communities support charter fleets ranging in size from a half-dozen to over 100 boats. The Homer halibut charter boat industry generated \$9.1 million in gross income and the equivalent of 64 full-time year-round jobs in the Homer economy in 1985 (Coughenower 1986) (from Meyer 1996).

The economics of the guided and unguided charter fishery was recently described in the EA/RIR/IRFA for the regulatory amendment to manage the guided sport fishery for halibut off Alaska (NPFMC 1997). Chapter 3 of the analysis prepared by staff of the University of Alaska's Institute for Social and Economic Research (ISER) is excerpted below. Table and figure references are maintained from the original source to allow the reader to cross-reference the two documents as needed.

### 3.4.1. Overview of the Halibut Sportfish Fishery

#### 3.4.1.1 Number of Anglers

Growth in the number of sport anglers in Alaska is best demonstrated by the growth in the number of sport fishing licenses, recognizing that not all anglers are required to obtain licenses. In particular children under 16 and senior citizens are exempt from licensing requirements. Since 1961 the growth rate of licenses has been 6.6% annually (all growth rates in this chapter are calculated using regression analysis), but over time that rate has fallen. Since 1985 the growth rate has been 3.4% and since 1990, 2.9% (Table 3-2).

During this entire period 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 3-1). Since the mid-1980s, there has been essentially no increase in the number of resident licenses while non-resident licenses have continued to increase at 6.7%. The result is that 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%.

Growth in the number of resident licenses is correlated with the Alaska population which has grown since 1961 at 3.1% but the relationship has not been constant. Over this entire period on average 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 now fallen to 29% from its high of 34%. The reason for this decline may be due to the changing demographics of the population, but its cause is not clear.

Growth in the number of non-resident licenses is related to the growth in the number of visitors to the state which has averaged 5.1% annually since 1985. The percentage of visitors who obtain a sport fishing licence has remained fairly constant since visitor counts began at about 20%. 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% annual rate compared to 6.3% for visitors in total. In 1995 24% of visitors were cruise ship passengers.

#### 3.4.1.2 Sportfish Angler Days

The average number of days fished per angler has increased slightly since 1990. For resident anglers the mean number of days in 1995 was estimated to be 6.81 while for non-residents it was 4.1 days.

For residents the increase in the number of days fished more than offset the decline in the number of anglers so the total number of days fished totaled 1.802 million in 1995. For non-residents the number of days fished was .986 million in 1995. The number of resident anglers in this table exceeds that of non-residents because of the inclusion of resident anglers not required to obtain a license. The table also shows that over 70% of angler days occur in Southcentral Alaska, about 20% occur in Southeast Alaska, and the remainder occur in the Arctic region as defined by the Alaska Department of Fish and Game.

There is no information on the number of angler days specifically devoted to halibut (the target species was halibut), or to the number of days during which one of the targets was halibut--either because the day was specifically a combination trip involving, most commonly, halibut and salmon, or because there was an incidental effort devoted to halibut. (The ADF&G collects information on catch by trip, but since not all trips that target halibut catch halibut, this data would not tell us the number of angler days during which halibut was a target.)

The 1993 ISER statewide sport angler surveys identified the share of household angler trips which targeted halibut. A household angler trip could involve several anglers and extend over several days, so the measure is not directly comparable to the number of angler days. Of resident household angler trips 10% targeted halibut and 1% were halibut/salmon combination trips. (This was before the development of Deep Creek as a charter location offering primarily combination trips.) Of saltwater trips 28% targeted halibut, 3% targeted a combination

of halibut and salmon, 63% targeted salmon, and the remainder targeted some other species. Of non-resident household angler trips, 15% targeted halibut, and 8% targeted halibut and salmon in combination. Of saltwater trips, 35% targeted halibut, 18% targeted a combination of halibut and salmon, 41% targeted salmon, and the remainder targeted some other species.

The ADF&G data on the number of licenses and the number of angler days, in combination with their data on the halibut harvest, gives some indication of the effort in the halibut sport fishery. Table 3-2 shows the calculation of the ratio of halibut harvest to the number of sport licenses. This ratio has increased from .43 in 1983 to a high of .81 in 1993. It was most recently .78 in 1995. The accompanying graph (Figure 3-2) shows the stepwise increase in that ratio and the fact that its growth appears to have slowed or stopped in recent years.

The harvest per 1000 angler days is calculated in the next table (Table 3-4) which shows an increasing intensity for the state, the ADF&G regions, and the ADF&G areas, but again indicating that the intensity may have reached a maximum in recent years. In Southeast Alaska the harvest per 1000 anglers peaked at 186 in 1993 and in Southcentral Alaska it peaked in the same year at 120.

This evidence suggests that the share of total angler days, angler trips, and household trips which target halibut is significant and has been increasing in the past. The growth in the number of angler trips targeting halibut exceeded the growth in the number of anglers in past years, but the number of trips targeting halibut per angler may now be stabilizing. Although the apparent relationship between anglers and angler days targeting halibut could be due to an increase in the harvest rate of halibut per angler, the other available data on catch per unit effort from the ADF&G suggest that this is not the cause as the catch per unit effort has not trended upward (and certainly not at the rate required to account for the relationships observed here) nor has the retention rate (the % of catch harvested).

### 3.4.1.3 The Sport Halibut Harvest

#### 3.4.1.3.a Number of Sport Halibut Caught and Harvested

The ADF&G is the source of information on the number and weight of the sport catch and harvest of halibut in Alaska. Data on the catch and harvest by location comes from their annual mailout survey which goes to resident and non-resident sport anglers. Data on mean weight comes from their onsite and creel surveys taken within the season at various port locations in Southeast and Southcentral Alaska.

The historical harvest information by ADF&G region and area is shown in Table 3-5. The harvest is self reported by anglers by location within these areas and aggregated. About 72% of the harvest was taken in Southcentral Alaska in 1995 with most of the remainder taken in the Southeast. The harvest in 1995 was 325,188 halibut, down marginally from the peak harvest of 329,046 the year before. Data for 1996 will not be available until later in the year because the survey is mailed out at year end.

The annual average growth rate for the entire state for the period from 1983 to the present is 10 percent, but there is considerable variation in that rate across the areas of the state, ranging from a high of 25.9% for the Prince of Wales area in Southeast Alaska to a low of -4.6% in Haines-Skagway. The harvest in the Southwest-Arctic region is insignificant.

The growth rate has not been constant over time. Even after smoothing the harvest by taking the moving average over 3 years to reduce some of the year to year fluctuations in the harvest data, the growth rates, when graphed, display considerable variation. The IPHC 2C and 3A regional growth rates are shown on the next two graphs (Figure 3-3). There is an identifiable downward trend in the growth rates in both regions, which when calculated for the period from 1990 through 1995 result in annual average growth rates of 6.4% and 6.3% respectively for IPHC areas 2C and 3A. The trend is punctuated by periods when the rate is considerably above or below that trend. Because of the absence of a model for estimating the harvest, we cannot say why the growth rate displays such variation from year to year. (In particular we cannot say the extent to which it is due to real factors such as

the health of the fishery and the availability of competing fisheries, and the extent to which it is merely an artifact of the fact that the estimate is based upon a sample of anglers.) But the fact that the growth rate does vary so much cautions against using the change in one or two years to make inferences about the longer term growth of the harvest. In interpreting the declining trend in the growth rate, we can relate it to the plateauing of the harvest per angler and in the plateauing of the harvest per angler trip as noted in the previous section. The annual growth rates at the area level display the same general pattern, albeit with more year to year fluctuations. Again this variation cautions against using the change in one or two year to make inferences about the longer term growth of the harvest.

#### 3.4.1.3.b Mean Net Weight of Sport Harvested Halibut

Annual estimates of the mean net weight of sport caught halibut by location in Alaska are made by the ADF&G using onsite and creel surveys. This estimate is the mean net weight (or dressed weight) which is the halibut without the head. It is assumed that the weight of the head equals one fourth of the total (round) weight. Therefore, a halibut with a net weight of 20 pounds would have a round weight of just over 26 pounds. The survey data is extrapolated to locations not surveyed to yield mean estimates for the region and for the state as a whole. This information for IPHC regions 2C and 3A is summarized in the next graph (Figure 3-7) which shows the mean weight increasing through the 1980s, and since then fluctuating around 20 pounds. The mean weight has been estimated to be about the same in each region for most years. The graph also shows that the mean weight can vary considerably from year to year. Most recently the estimate for 2C increased from 18.3 to 21.7 pounds net weight between 1994 and 1995, a change of 19% in a single year.

#### 3.4.1.3.c Total Weight of Sport Harvested Halibut

Combining the harvest and mean net weight data yields that total net weight of sport harvested halibut in Alaska -- IPHC sport removals. The historical summary of the number of halibut harvested by sport anglers as well as the average net weight of sport harvested halibut, both taken from ADF&G documents and most recently from memoranda, is presented in the next table (Table 3-7) along with the most recent estimate of sport removals from the IPHC. The IPHC halibut sport removal figure comes directly from the ADF&G data, and it does correspond closely to the sport removals calculated as the product of harvest and mean net weight, except for the two most recent years--1994 and 1995. The IPHC data shows a drop in 1994 followed by growth in 1995 whereas the recreation using the ADF&G data shows a larger drop in 1994 followed by a small further decline in 1995.

The difference is significant and it underscores the danger of basing allocation policy on data which is not accurate. Not only are the 1995 figures from the two sources different by .650 million pounds, the short term implications of the two sets of figures for growth are inconsistent. Based on the recreated ADF&G data, sport removals fell 13% between 1993 and 1995. Based on the IPHC data sport removals fell only 4% and actually increased between 1994 and 1995 by 4.5%. (The 1995 ADF&G data is from ADF&G memos and published reports.)

The differences appear to be the result of the IPHC using preliminary estimates of mean net weight in their estimates of total removals, and perhaps not revising their figures when better estimates become available from the ADF&G, although those estimate revisions may not be directly communicated to the IPHC. The reality however is that it takes more than a year from the end of the season to get an accurate estimate of sport removals because information on the halibut harvest comes from the mailed survey. Data on mean weight is available much earlier. In the analysis that follows, we assume that the IPHC removal estimates will eventually be revised to be consistent with the most current mean net weight estimates of the ADF&G. Thus our estimate of the total sport removals in 1995 is 6.187 million pounds rather than the 6.836 million pounds currently reported by the IPHC.

Growth in sport removals of halibut, the total mean net weight, as estimated by the IPHC using data provided by the ADF&G, has been at an annual rate of nearly 20% between 1977 and 1995 (before downward correction of the estimates for 1994 and 1995). Because of the stability of the mean net weight estimate in recent years, this



growth rate has declined since the mid 1980s, and the growth rate of total sport removals more closely tracks the growth rate of the number of halibut harvested.

#### 3.4.1.4. Guided and Unguided Anglers

##### 3.4.1.4.a Shares of Harvest and Residence of Anglers

Data on the guided sport harvest of halibut by location is available only for the most recent three years from the ADF&G based on a combination of information from the mailed survey (for the Kenai Peninsula) and the onsite and creels surveys (for the major ports in the state). In the most recent year, 1995, the guided harvest was 190,015 out of a total harvest of 325,188, or 58% of the total. The guided share appears to be growing since it was calculated to be 50% in 1993, but these shares are based on estimates of the guided harvest and subject to some error which may overestimate the growth in the guided share. However growth in the number of visitors, a major source for guided halibut charter business, has been strong during the early 1990s. The bulk of the guided harvest is taken in Area 3A. In 1995 of the total guided harvest, 73% was taken in Areas 3A. Virtually all the rest was taken in Area 2C. (Of the unguided harvest, 70% was taken in Area 3A.) Within the regions there is also considerable variation by location. For example, in 1995 in Prince of Wales 72% of the sport harvest was reported as taken by guided anglers, whereas the share was only 20% in Skagway.

The tables also show that in 1995 76% of the guided halibut were taken by non-residents. In Area 2C, the share was 95% and in 3A it was 68%. The distribution by location is shown in Figure 3-9. The non-resident shares also appear to be increasing as the share of licenses and angler trips taken by non-residents continues to grow. In contrast the share of unguided halibut taken by non-residents was 36%. In Area 2C, the share was 47% and in 3A it was 31%. The total share of the halibut harvest taken by non-residents was 59%. In Area 2C, the share was 74% while in 3A it was 53%. The relationship among resident and non-resident harvest as well as guided and unguided harvest as estimated for the last 3 years is presented in the next set of graphics (Figure 3-10). These estimates suggest that the growth in the harvest in the last 3 years has been mostly among the non-resident guided harvest.

Note that the total net weight estimates for 1994 and 1995 using these detailed weight and harvest figures are not identical to those presented in an earlier table. Using this data we estimate that in 1995 the guided sport removals were 3.9 million pounds, and the unguided sport removals were 2.5 million pounds for a total sport removal of halibut from Alaskan waters in 1995 of 6.4 million pounds. This estimate is based on location specific estimates of the mean net weight of halibut and further underscores the range of uncertainty surrounding the current methods of estimating the annual weight of sport removals. (The differences between this table and the earlier presentation is confined to the estimates for 2C.)

A longer time series exists on the guided and unguided shares of the halibut harvest for the Kenai Peninsula. This data shown in the next figure (Figure 3-11) shows the growth of the charter harvest in contrast to the relative stability or very modest decline in the non-charter harvest. The charter share of the harvest has increased from 30 to 60% of the total over the last 10 years.

##### 3.4.1.4.b Other Angler Characteristics

Limited data from onsite surveys in Southeast and Southcentral Alaska suggests that the harvest rate for guided anglers is higher than for unguided anglers. The next table (Table 3-10) shows a comparison produced for 1994 for ports in Southcentral Alaska based on ADF&G onsite surveys. The halibut harvest per angler was consistently higher for charter trips. For example in the Lower Cook Inlet area the rate for charter trips was 1.86 halibut per angler while the rate for private trips was 1.1 halibut. (This data may be influenced by the fishing activity of the crew of the charters who may allocate their catch to the clients.)

In 1993, the guided angler catch rates per hour were three times the non-guided catch rates in Ketchikan and Juneau, and more than twice as high in Sitka and Petersburg. However in 1992 the differences were not nearly

as great. In Southcentral Alaska the share of the guided harvest in 1993 and 1994 was larger than the share of the guided angler days, but the difference suggests a smaller differential in the harvest rates than the Southeast catch rates suggests.

The 1993 ISER sport angler surveys found the halibut retention rates to be 68% for non-resident charter clients and 64% for resident charter clients. For private anglers the retention rates were 78% for non-residents and 61% for residents.

Charter clients catch slightly larger halibut than private anglers based on data collected intermittently by the ADF&G using onsite and creel surveys. For example in 1995 ADF&G estimated the mean net weight of the guided harvest at 20.5 pounds and that of the unguided harvest at 18.4.

A number of items of information from various surveys help to provide some idea of the characteristics and motivations of non-resident anglers with respect to halibut fishing, but picture that emerges from the limited data is not precise. The picture which emerges is one of two groups of non-resident charter clients; one of which is composed of avid fishermen with a definite plan for the types of fishing they want to do while in the state, and the other composed of those who may participate in a guided halibut trip, but their visit to Alaska is not determined by the fishing opportunities in the state.

The ISER survey of non-resident anglers indicated that 48% of those non-residents who took a halibut fishing trip while in the state considered themselves avid anglers, defined as a person who would not have visited Alaska if he/she had been unable to fish (Table 3-11). The survey also indicated that of those non-residents who took a halibut charter trip, 29% had extended their visit to Alaska because of fishing, although not necessarily because of halibut fishing. The remaining 52% of halibut anglers considered themselves casual fishermen.

When given a list of characteristics of fishing trips, 72 of these non-resident anglers indicated that catching a lot of fish was very important to them (and somewhat important to an additional 23 percent) while 11% indicated that obtaining food was a very important reason for fishing. Together these responses suggest that a significant group of non-resident anglers are serious about their halibut fishing.

The Jones and Stokes survey of non-resident anglers in Southeast Alaska asked them what was important in their decision of where to fish in Southeast Alaska. The percentages rating the following characteristics as important were (this information was not differentiated by species targeted):

being in an area of exceptional beauty	55%
being in an area with few other anglers	39%
being in a wilderness area	36%
a good chance to catch our limit	35%
availability of guiding services	30%
a good chance to catch trophy sized fish	30%
an area with fly-in access	25%
not having to travel a long time	23%
availability of campground / cabin facilities	22%
not having to cross rough water	20%
availability of package tour	19%

The survey also found that 62% of non-resident anglers (fishing in Southeast Alaska) took fish home with them when they left Alaska.

The most recent visitor survey of the Division of Tourism asked visitors what they had planned to do in Alaska that they did not have time to do. Fishing was the second most often identified response, made by 15% of respondents.

The survey of non-resident anglers who fished in Cook Inlet found that respondents felt that with better fishing on the Kenai River 16% of those who did fish would have increased the length of their Alaskan visit by a mean time of 4.8 days (maximum set at 7 days).

The motivations and expectations of non-resident charter clients in Alaska may be somewhat different than charter clients in other locations who may be less interested in harvesting a fish than of simply experiencing a trip to the shore and having some activity to engage in with friends at the destination. For example, a study of the Lake Superior charter fishery in 1987 found that 76% of clients visited the shore solely or primarily to fish, but that relaxation, enjoying nature, getting away, excitement, companionship, and family togetherness all ranked above catching fish as the reason to take a charter (Minnesota Sea Grant Extension Program, Research Report 27).

Information from charter brokers, the ISER surveys, and interviews all suggest that the share of cruise ship passengers who charter for halibut is very small due to the distance from the major cruise ship ports to the good halibut fishing grounds and the fact that the typical cruise passenger activity while in port is generally limited to 4 hours. Virtually all take half day charters because of the schedule of the cruise ship--all meals are prepaid on board so clients tend to engage in half day activities while in port. Most cruise ship passengers taking fishing charters do not fish for halibut. Salmon is the preferred fish since it is generally faster to get to the salmon fishing grounds than the halibut fishing grounds. The ISER survey estimated that cruise ship passengers made up 3% of halibut charter passengers statewide and 18% in Southeast. Cruise passengers made up 6% of halibut / salmon combination trips statewide, and 7% in Southeast. As a percentage of cruise ship passengers, somewhere between 3 to 5% took a halibut charter, based on information from brokers and others.

The distribution of residence and halibut sportfishing activity of Alaska residents is shown in the next figure (Figure 3-12) which demonstrates that resident halibut charter trips are primarily a Southcentral Alaska phenomenon. Because of the distribution of the population sport anglers are concentrated in the Alaska railbelt including the cities of Anchorage and Fairbanks and the surrounding areas of the Kenai and Matanuska-Susitna Boroughs. More than 75% of the Alaska resident sport anglers who took halibut charter trips in 1993 were residents of the two railbelt cities of Anchorage and Fairbanks. Residents of the Matanuska-Susitna Borough were the only other group that took a share of guided halibut trips greater than their numbers would suggest. In contrast the share of Southeast Alaska sport anglers taking a halibut charter trip was extremely small.

### 3.4.1.5 The Guide and Charter Industry

#### 3.4.1.5.a Overview

The only comprehensive overview of the guide and charter industry in Alaska is based on the ISER survey done in 1993 which identified 1,151 firms which received payment for either accompanying and directing anglers for any portion of a sport fishing trip, or for providing transportation to a fishing location visited on a sport fishing trip. (Because it includes those firms merely providing transportation to a fishing location, this definition of the industry is broader than that of the ADF&G registration file.) These businesses generated gross receipts of \$110 million and employed 4,230 people during the sportfishing season or about 1,250 on an annual equivalent basis. The survey probably underestimated the size of the industry because there was no government agency at that time which could provide a complete and accurate list of the number of firms operating in the industry. This estimate excludes guide and charter operations that do not provide services to sport anglers, for example those firms only providing sightseeing services.

These firms provided a wide variety of services. For example some firms were wilderness lodges in Southeast or Southwest Alaska providing a full week long package of services at a premium price. At the other extreme were part time operators offering a spot on a 24-foot vessel out of Deep Creek with a minimum of amenities. In between were fly-in fishing operators based in Anchorage, small charter operators working through a broker, perhaps with a bed and breakfast on the side, larger operators with several boats, and an endless variety of other combinations. In addition to guiding and chartering services many firms provided transportation, food, lodging,

equipment rental, sales of equipment, and other services. Some firms provided services only to anglers, while others served a wider clientele, typically hunters and people pursuing other leisure time activities. Respondents estimated that 73% of their business--including all services provided--came from sport anglers. This was substantiated by the earlier Jones and Stokes survey of sport fishing related businesses in Southeast Alaska which found that of the businesses providing sport fishing guide services, 49% offered sightseeing, 22% offered hunting and 7% offered other services in addition to sportfish guiding.

Those firms specifically providing charter halibut services also offer a variety of services to a variety of clients as well, as demonstrated by the brochures and Internet advertisements summarized in Appendix G. For example the brochure of one halibut charter operator lists the following services offered: sport fishing, pleasure cruise, nature viewing, marine research, business seminars, fisheries studies, cold water diving, game hunts, sea duck hunts, kayak dropoffs, whale watching, cabin dropoffs, and crabbing. Halibut charters can be grouped roughly into the following categories: pure halibut day charters typical of Homer, combination day charters targeting both salmon and halibut typical of Deep Creek, day charters targeting either halibut or salmon depending upon the season and the desires of the client typical of some Southeast Alaska locations, lodge operations targeting halibut on one day of a multi day stay typical of some Southeast and Southwest Alaska locations, overnight charters designed to maximize the harvest of halibut and other species by allowing two days of fishing in a short period of time, bare boat charters where the client rents a boat but is not actively guided, and charters where halibut is not the target but where there is an incidental catch, for example if the salmon are not biting a charter may throw in a line for halibut to satisfy a client.

The heterogeneous nature of the industry is reflected in the wide distribution of size of firms. This is an industry with a large share of very small, seasonal, and probably marginal operations. For the 74% of guide and charter firms that reported owning boats in the ISER study, the reported mean gross receipts was \$82,000. However one quarter of the firms reported gross receipts under \$10,000, half reported gross receipts under \$28,000 (the median), and 75% reported gross receipts of less than \$77,000. Of approximately 200 firms with gross receipts over this amount, only 3 exceeded \$1 million. The larger firms were more likely to be providing lodging and other services in addition to guiding and chartering alone. Although the survey does not provide direct information on the composition of total income of the participants in this industry a large share clearly must not depend on guiding as their sole means of financial support.

Of those operations that reported owning a boat, 67% had one, 20% had two, 8% had three, 4% had four or five, and the remaining 1% had more than five for a total of 1,320, and a mean of 1.55. The mean cost of boats was \$45,400, but 50% were reported to cost less than \$23,500 and 75% were reported to cost less than \$53,000. 86% had been purchased within the preceding 6 years.

Of the operators with boats, 77% indicated halibut was one of the species targeted. This is in contrast to 84% that reported targeting salmon. (Since some respondents reported targeting more than one variety of salmon, this is a slight overestimate of the percentage of operations targeting salmon.). Clearly a large share of the firms target both halibut and salmon.

The survey also showed that the residence of guide and charter industry employees varied with the location of the firm. For the state as a whole 13% of the employee months were attributable to non-resident workers. The share was lowest in Southcentral where 4% employee months were attributable to non-resident workers, and highest in the Southwest where 36% of the employee months were attributable to non-resident workers.

#### 3.4.1.5.b Size of the Alaska Halibut Charter Fleet and Historical Growth Pattern

Calculating the size of the Alaska halibut charter fleet is complicated by data and definitional problems. As already discussed, the data generated through the licensing and registration activities of the government agencies involved in overseeing and regulating the charter industry and the halibut harvest do not allow us to determine the number of vessels, the number of firms, the number of owners, or the number of operators involved in the industry. In addition there is no clear definition of what it means to be involved in the halibut charter industry.

There is a continuum of levels of involvement ranging from the exclusively halibut single boat charter firm through those firms that target halibut for a portion of the season to firms that might take a few halibut charter trips in a year and the charter that may take an occasional halibut while targeting other species, or at the special request of a client. The exclusive halibut charter is relatively easy to identify and include in a count of firms or vessels, but the others become increasingly difficult to find and quantify because of their increasing invisibility as one moves out the continuum toward lower levels of involvement.

With the exception of the IPHC licenses there is no consistent time series on the number of vessels or firms in the industry. Two estimates of the size of the fleet are available for previous years. In 1993, the ADF&G estimated 428 charter vessels in Southcentral Alaska. In 1994, the NPFMC guided charter working group estimated approximately 500 vessels statewide in the fishery with 200 described as full time.

#### 3.4.1.5.c Charter Fleet Operating Characteristics

Information on the operating characteristics of the guided charter fleet comes from the ADF&G onsite and creel surveys, the interviews with the charter operator informants, and the IPHC license file. Because of the source of most of this information, it is more representative of the more active operations and may not represent the less active operations as well. Based on this information, the operating characteristics of the fleet vary across locations so that some error is introduced into analyses that must extrapolate from one location to another, which may be geographically close.

The season length for halibut is approximately 4 months with a peak in July when about 36% of the harvest is taken, followed by about 24% in each of the adjoining months. In some locations halibut is available throughout the season while in others there are times during the season when halibut is the target and others when salmon is the target. In some locations the season begins later than in others.

Bookings begin months before the season begins. Some operators get a large share of their customers through advance bookings, while others primarily serve walk-in customers. No information is available on the percent of customers that book in advance although a survey of charter boat customers in Michigan found that 86% of customers had booked in advance and of these 69% had booked more than one month in advance (Mahoney, Brunke, and Pistis, Michigan State University, 1986).

The typical operator does not have a trip every day during the season both because the industry is demand driven and because weather forces cancellation on some days. Ninety days of operations during the season is probably the maximum realistic number. Although halibut is a directed fishery, for most operators not all trips would be targeting halibut, and both the share and the timing of the halibut trips will vary by port. Thus it is difficult to generalize about the dependence of the charter fleet on halibut as a target species. For example in Petersburg 73% of the charter trips in 1996 reportedly targeted halibut while in Sitka only 6% targeted halibut, but 44% targeted halibut and salmon in combination for a total of 50%. (The information on the share of charter effort devoted to each target species is not always consistent, perhaps because there are several ways to estimate effort--catch, harvest, hours, trips, etc.) The preferred target species is partially a function of the distance to the fishing grounds. In Southeast Alaska halibut is a more popular target in the ports facing the open ocean--Sitka and Craig, relative to the ports which require several hours of travel to reach the open ocean--Juneau and Ketchikan.

Data on the mean number of trips actually taken per vessel is not available, but a comparison of the halibut harvest with the number of active vessels estimated by port suggests some variation. However the data is inconsistent for some ports (suggesting more trips than are logically possible for the number of active vessels to catch the reported harvest) so we cannot place much confidence on estimates of the mean number of trips targeting halibut per vessel in different locations. There is no information on the distribution of number of trips across the fleet, either statewide or by location.

The vast majority of charter trips are day trips although the length of trip varies with conditions and customer demand. Some operators may make more than one trip in a day, particularly during the season peak. A few operators offer overnight trips which allow an angler the opportunity of two days worth of harvest on one trip. The majority of boats have a capacity of 6 passengers, popularly known as a 6-pac because its operation as a charter requires a Coast Guard 6 passenger license. This is especially the case in Southeast Alaska since there is a limit of 6 fishing lines in the water on charter vessels so larger capacity vessels for charter fishing have no advantage. In Southcentral Alaska there are charter boats with a larger capacity. Whereas the mean vessel length for the sport category licensed fleet in Craig is 22.8 feet, in Valdez it is 34.1 feet. There is also variation among vessels within ports. In Homer, for example, the majority of vessels have a capacity of six passengers, but there are a number of vessels with a capacity of 20 or more passengers.

Many operators indicate a preference for operating with less than a full boat because it is more comfortable. Of course even if an operator wanted to take a full boat every day, demand determines the mean number of passengers per boat. Operators indicate 4 passengers is a typical load for a 6-pac boat. This is supported by data from the ADF&G for Southeast Alaska. For Southcentral Alaska the mean anglers per boat trip is larger because of the larger capacity of the mean vessel, but there is considerable variation across ports from a low of 4.4 in Kodiak to a high of 8.3 in Seward (1994).

The majority of firms are single vessel operations. Among the sport category vessels, 512 are associated with single vessel firms (based on the vessel owner who in some instances may lease his vessel or services to another operation). Ninety-four multi-vessel firms had a mean of 3.4 vessels each. Some of the multi vessel firms are lodges.

Six-pac vessels may operate with or without a crew member to assist the captain. Larger vessels will generally require a crew. The mean crew size for the sport category of IPHC licensed vessels is 1.5.

IPHC license filings, ADF&G registrations, and informant interviews suggest that most vessel operators (not necessarily including crew) are residents of Alaska. Only 57 of 2,055 IPHC licenses were issued to vessels homeported outside Alaska in 1996. Because some non-residents will list a home port in Alaska the true non-resident share is higher, perhaps as much as 10%. Although the non-resident share appears to have fallen over time, this is not necessarily the case since prior to 1994 IPHC licenses were not location specific so all licenses were valid for Alaska. That is no longer the case.) A slightly larger share, 72 of 1,578 ADF&G registrations went to vessels homeported outside Alaska. In Southeast most residents live in the homeport of their vessel, but in Southcentral Alaska many resident captains and owners live in the Railbelt and operate in Cook Inlet or Prince William Sound.

The IPHC license file permits analysis of the continuity of license holders over time. Figure 3-17 shows the percentage of license holders who remained in the license file after each year for the entire sport category of license. Independent of the year when a license was first obtained, the proportion of license holders remaining after 4 years is less than 50%. Fifty percent of sport license holders have held licenses continually for 3 years or more counting 1996. An additional indicator of the turnover in the industry is suggested by the experience in conducting the ISER survey of guides and charters in 1993. Of 1,983 listings provided by ADF&G in the belief they were guide and charter operations and contacted by ISER, 1,178 responded and of those 29% indicated they were not engaged in guide and chartering of sport anglers.

### 3.4.2 The Economics of the Guided Halibut Fishery

#### 3.4.2.1 The Direct Effect of Charter Operations

The total economic activity directly associated with the guided charter halibut fleet can only be estimated based on the guided halibut harvest in conjunction with assumptions about the mean harvest per angler trip, the mean anglers per trip, and the mean price of a charter trip. In addition the share of halibut harvested on trips including

other target species, essentially halibut/salmon combination trips, must be identified and an arbitrary attribution of the share of the price of such combination trips between halibut and salmon must be made.

The number of guided halibut angler trips in 1995 is estimated to be 123,093 of which 47% are halibut only and 53% are combination halibut/salmon trips. This analysis assumes that all halibut charter trips result in the harvest of halibut. If some trips occur without the harvest of a halibut these estimates are too low, and the estimated charter gross revenues are also too small.

We arbitrarily attribute 50% of the price of a combination trip to halibut, and use data from the ADF&G onsite and creel surveys on mean harvest per angler trip, mean anglers per trip and share of halibut harvested during combination trips where available and assumptions where the data is unavailable. Assuming the 1995 guided halibut harvest, the gross revenues to the charter industry in 1996 dollars attributable to halibut is \$14.493 million. The ports with the largest gross revenues are Homer, Deep Creek, Seward, Sitka, and Valdez respectively. This estimate of gross receipts is less than the gross receipts of all charter trips during which a halibut was harvested. If we included the entire price of combination trips the total estimated gross receipts would have been \$19.695 million.

#### 3.4.2.2. The Economic Significance on the Community and State

Adding the visitor associated expenditures to the direct charter expenditures produces an estimate of the total expenditures directly attributable to halibut charter activity in 1995 (in 1996\$) of \$28.986 million. Of this total, 25% is accounted for by Alaska residents and 75% by non-resident visitors.

The total economic significance of the guided halibut fishery includes not only the amount that anglers spend on charters directly, and the amount of other spending in association with charter trips. Both the charter expenditures and other expenditures on food, lodging, transportation, processing, and incidentals purchased during the trip on which the charter takes place create additional economic activity in the community. This additional activity results through the spending in the community by the charter operations, both on equipment and supplies for operations and for living expenses, and by the spending in the community by the visitor service businesses which make sales to the visitors for transportation, food, lodging, and other expenses. How much recycling takes place depends upon the type of expenditure, the residence of the charter operators and crew members, and the level of support activities offered within the local economy. The size of the total economic effect, or multiplier, is generally higher for those expenditures which are associated with labor intensive activities such as fish processing rather than expenditures for the purchase of goods and supplies such as fuel or electronics equipment. This is because labor is supplied within the community and the income of the person supplying the labor thus gets another opportunity to circulate in the community. Most goods on the other hand are manufactured outside the state and expenditures for their purchase leave the community and thus have no opportunity to recirculate locally.

From the perspective of the Alaska maritime community with a charter industry, most of the expenditures for chartering are brought in from outside the community, either by residents or non-residents, and consequently all can be considered as contributing to the economic health of the community. In Table 3-30 we calculate the total personal income generated at the community level from halibut charter activity. This is slightly less than the sales generated by visitor expenditures since some of the sales of businesses to visitors do not convert to income of local business owners or employees but rather to sales of goods and services of businesses outside the region.

From the perspective of the Alaska economy as a whole only the charter related expenditures of non-residents represent new money added to the economy. The charter related expenditures of Alaska residents would, in the absence of halibut charter opportunities, mostly be spent on other activities within the state. Thus the measure of the statewide economic impact of the halibut charter activity is the portion attributable only to non-residents. We estimate that total for 1995 to be \$17.453 million.

From the perspective of the U.S. economy as a whole the economic impact of the charter related expenditures is essentially zero, except for those expenditures that can be traced to visitors who are not residents of the U.S. This is because in the absence of halibut charter opportunities, U.S. residents would substitute spending on other activities for the spending now devoted to halibut charter trips. Only if some anglers would choose to take a trip outside the U.S. (Canada, for example) in the absence of domestic halibut charter opportunities could we conclude that from the national perspective the economic impact of halibut charter trips was non-zero.

In addition to income we can also calculate an indicator of the employment associated with halibut related expenditures. Based on the average annual wage by region the number of annual average equivalent jobs associated with halibut charter related expenditures in 1995 was 715 and 532 if only the non-resident expenditures were considered. Since most of this employment is seasonal, we can also estimate that if these jobs all occurred within the summer season the totals would double to 1,530 and 1,064.

### 3.5 Administrative, Enforcement, and Information Costs

No significant additional administrative, enforcement, or information costs are expected either under the status quo (Alternative 1) or from the proposed action (Alternatives 2 or 3).

## 4.0 SUMMARY AND CONCLUSIONS

The Council has initiated this analysis to review the halibut possession limits for Alaska as a result of three requests: (1) a proposal submitted by the Alaska Longline Fishermen in 1993 to limit the guided halibut sport fishery and is an offshoot management action to proposed action to limit the halibut charterboat fishery; (2) a letter submitted by the Valdez Charterboat Association to the International Pacific Halibut Commission to increase the guided and non-guided sportfish bag limit for Pacific halibut from the current 2 fish per day and 4 fish in possession, to 3 fish per day and 6 in possession to allow the sport fishery to mirror the 36% increase in harvests projected for the 1997 commercial fishery; and (3) a motion by the Council representative from the State of Washington to revise the federal possession limit language to mirror revisions to Washington State regulations and IPHC regulations for landings 'on land.'

Critical to the Council's review of this management issue is an understanding that policy as well as regulations are being requested to be reexamined. National Marine Fisheries Service Enforcement Division, Alaska Department of Fish and Game and Department of Public Safety, Division of Fish and Wildlife Protection have found the current halibut possession limit to be unenforceable since federal policy on 'possession' is not clearly defined. If the Council intends the possession limit to extend until an angler has transported the harvested fish to the primary residence, the regulations describing 'possession' need to be revised under Alternative 2. If the Council intends that the current or potentially revised possession limits apply on land as well as at sea, a recommendation to the IPHC to revise the regulations needs to be approved under Alternative 2. And lastly, if the Council intends that multiple possession limits are legal, it may intend to limit those harvests under an annual possession limit under Alternative 3. ADFG survey data indicate that 43% of anglers harvested two or fewer halibut each year between 1990-95, and 73% harvested four or fewer. Without examining the costs associated with an angler's willingness to pay to harvest additional fish, the 4-fish possession limit appears to satisfy nearly ¾ of all sport halibut anglers.

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Table 3-2

INDICATORS OF DEMAND FOR ALASKA SPORT HALIBUT

	ALASKA SPORTFISH LICENSES			ITEM: FOREIGN NON-RESIDENTS	ITEM: ALASKA POPULATION	ITEM: ALASKA VISITORS	ITEM: ALASKA CRUIERSHIP VISITORS	SHARE OF POP PURCHASING FISHING LICENSE		ALASKA HALIBUT SPORT HARVEST			HALIBUT HARVEST PER LICENSE	
	RESIDENT	NON-RESIDENT	TOTAL					RESIDENT	NON-RESIDENT	TOTAL	GUIDED	UNGUIDED		
1961	41,120	14,444	55,564		239,700			0.17						
1962	42,016	14,783	56,799		242,600			0.17						
1963	43,180	15,977	59,157		249,600			0.18						
1964	45,355	15,627	60,982		253,200			0.18						
1965	46,421	19,489	67,910		265,200			0.18						
1966	60,267	21,289	71,556		271,600			0.19						
1967	60,357	26,694	76,951		277,900			0.19						
1968	69,344	32,221	90,565		284,900			0.20						
1969	62,646	38,777	92,323		294,900			0.21						
1970	71,711	41,682	113,393		308,600			0.23						
1971	76,952	39,649	116,601		319,600			0.24						
1972	82,088	42,347	124,435		328,600			0.25						
1973	69,629	38,179	128,002		339,400			0.27						
1974	95,485	39,416	124,900		348,100			0.27						
1975	101,900	45,621	147,521		384,100			0.27						
1976	116,679	59,194	177,873		409,600			0.29						
1977	121,919	55,621	177,540		418,600			0.29						
1978	129,760	65,491	195,251		411,600			0.32						
1979	130,459	72,090	202,549		419,700			0.32						
1980	132,109	74,699	206,802		419,800			0.31						
1981	139,764	67,417	207,181		424,300			0.32						
1982	169,324	108,014	251,339		484,300			0.34						
1983	169,761	102,471	272,232		499,100			0.34						
1984	177,659	116,127	293,786	9,443	624,000			0.34		117,042			0.49	
1985	176,725	127,077	303,802	9,970	649,900	729,300	149,600	0.32	0.17	124,970			0.43	
1986	177,481	131,011	308,472	9,694	659,700	784,200	174,100	0.32	0.17	127,834			0.42	
1987	179,417	138,691	317,108	10,765	641,300	781,600	171,400	0.33	0.19	160,853			0.62	
1988	179,976	169,959	349,934	6,348	638,000	789,700	166,700	0.33	0.21	146,829			0.48	
1989	174,942	183,088	358,040	13,124	639,900	809,600	167,000	0.32	0.20	225,108			0.63	
1990	160,214	182,779	342,993	13,689	659,124	659,900	194,800	0.33	0.21	229,016			0.65	
1991	184,613	161,192	345,805	14,727	669,889	925,800	195,100	0.32	0.20	247,202			0.68	
1992	182,245	208,616	390,761	13,919	697,328	899,000	212,000	0.31	0.23	289,623			0.73	
1993	181,649	205,720	387,369	19,362	697,889	1,099,916	247,000	0.30	0.20	284,943			0.69	
1994	183,189	227,088	410,274	18,446	692,900	1,190,000	285,100	0.30	0.20	313,147	166,616	167,276	0.81	
1995	176,429	236,021	414,449	17,142	699,600	1,176,200	289,660	0.29	0.20	329,048	166,652	166,652	0.80	
										326,188	169,947	136,241	0.78	
GROWTH RATE	6.16%	6.85%	6.60%	6.63%	3.03%	6.12%	6.63%							
65+	0.29%	0.73%	3.42%	7.11%	1.30%	6.12%	6.68%			0.62%				6.20%
60+	-0.39%	6.63%	2.69%	4.90%	1.60%	6.34%	9.93%			0.40%				3.41%

SOURCE: Alaska Department of Fish and Game  
Alaska Visitor Statistics Program, Department of Commerce and Economic Development

Figure 3-1

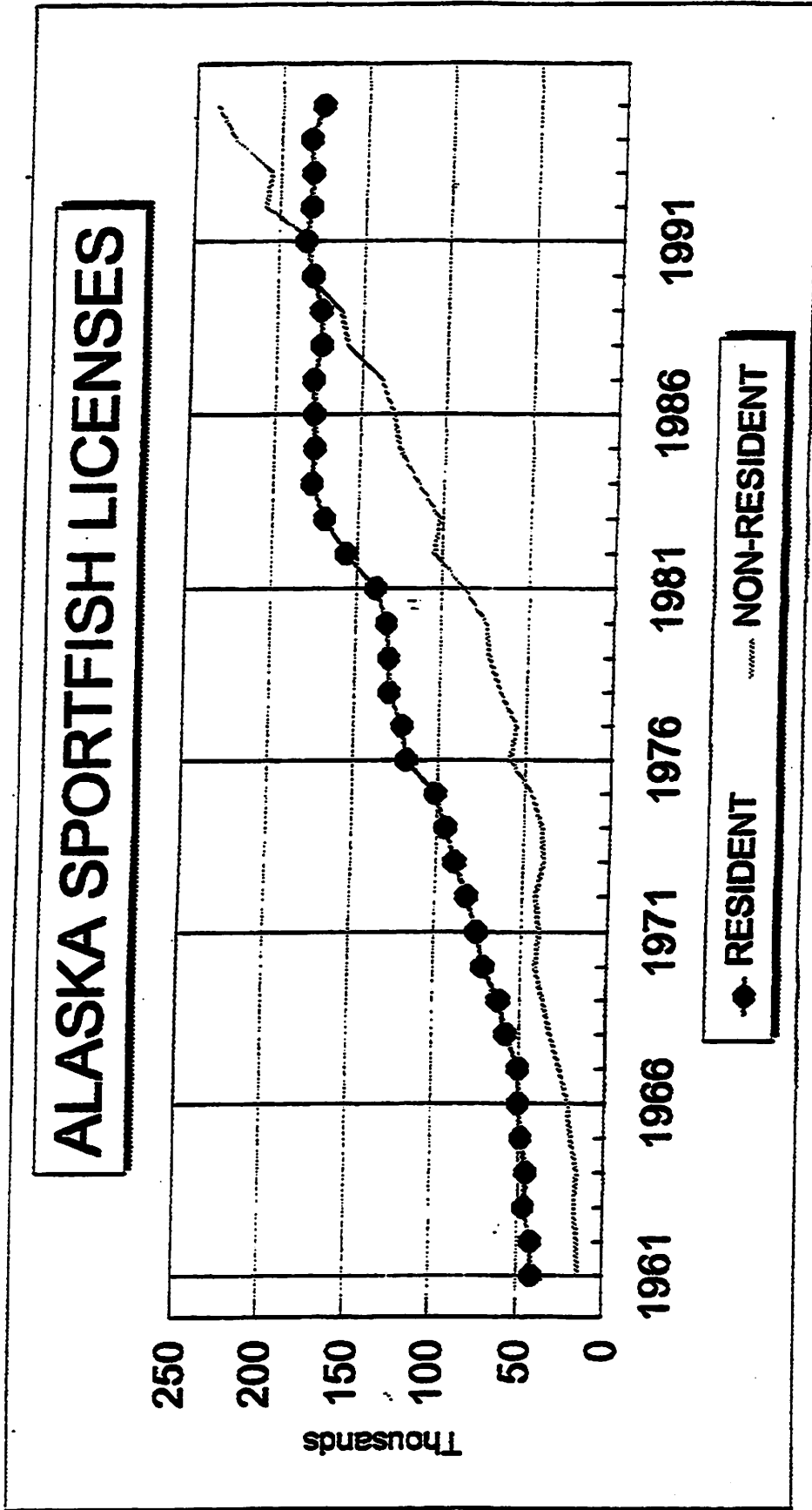


Table 3-3

ALASKA SPORT FISHING PARTICIPATION

	NUMBER OF RESIDENTS				NUMBER OF NON-RESIDENTS			
	SOUTHEAST	SOUTH CENTRAL	ARCTIC	STATE	SOUTHEAST	SOUTH CENTRAL	ARCTIC	STATE
<b>ANGLERS</b>								
1991	37,018	199,225	38,237	274,480	55,896	119,639	8,189	183,724
1992	36,835	198,034	34,328	269,197	60,616	121,316	8,254	190,196
1993	35,320	194,313	33,802	263,435	61,192	132,405	10,202	203,799
1994	36,041	193,054	33,102	262,197	78,198	141,841	9,346	229,385
1995	36,001	187,452	41,181	264,634	71,958	155,374	13,003	240,335
<b>GROWTH RATE</b>								
	-0.77%	-1.46%	1.13%	-0.99%	7.89%	7.03%	11.05%	7.51%
<b>DAYS FISHED</b>								
1991	251,954	1,270,319	190,772	1,713,046	202,397	511,736	29,150	743,283
1992	247,014	1,384,454	156,924	1,768,392	221,578	525,476	24,928	771,982
1993	258,612	1,301,567	187,973	1,748,152	212,591	565,666	32,999	811,256
1994	259,109	1,318,825	176,627	1,754,561	283,830	648,160	33,360	965,350
1995	271,069	1,308,126	222,720	1,801,915	260,921	677,413	47,421	985,756
<b>GROWTH RATE</b>								
	1.96%	0.25%	4.37%	0.94%	7.89%	8.01%	13.48%	8.20%
<b>AVG DAYS FISHED</b>								
1991	6.81	6.38	4.99	6.24	3.62	4.28	3.56	4.05
1992	6.71	6.89	4.57	6.57	3.66	4.33	3.02	4.06
1993	7.32	6.70	5.56	6.84	3.48	4.27	3.23	3.98
1994	7.19	6.83	5.34	6.69	3.63	4.57	3.57	4.21
1995	7.53	6.98	5.41	6.81	3.63	4.36	3.65	4.10

note: anglers may participate in more than one region of Alaska.

appendix 27  
Harvest, Catch, and Participation in Alaska Sport Fisheries: Annual, Alaska Department of Fish and Game

Figure 3-2

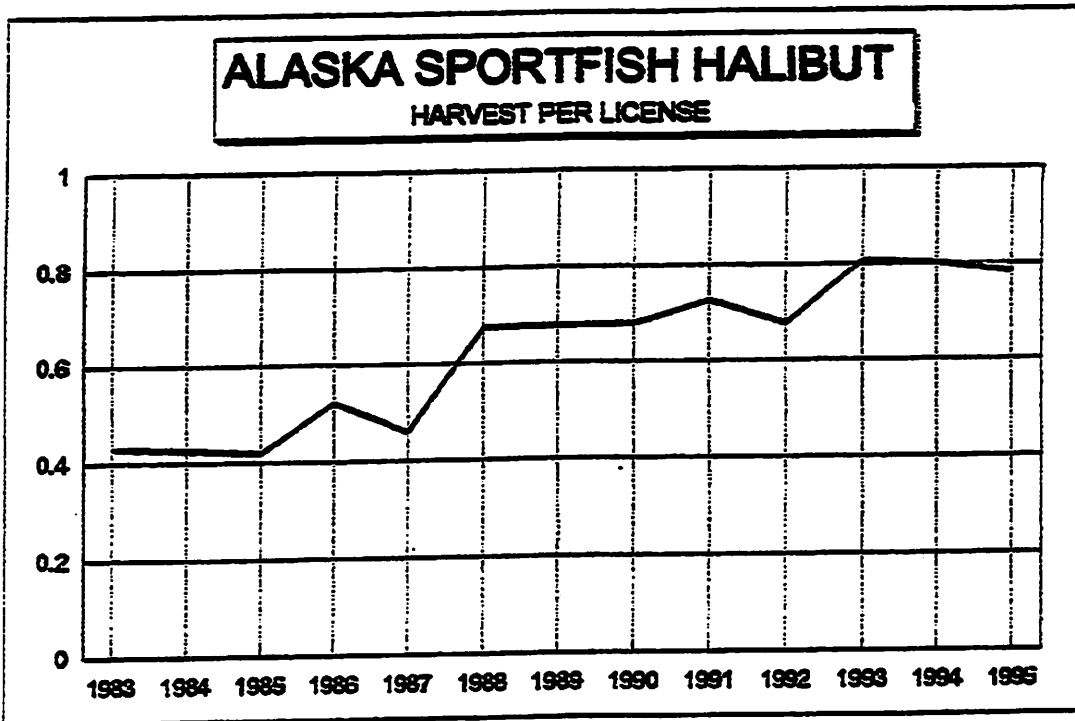
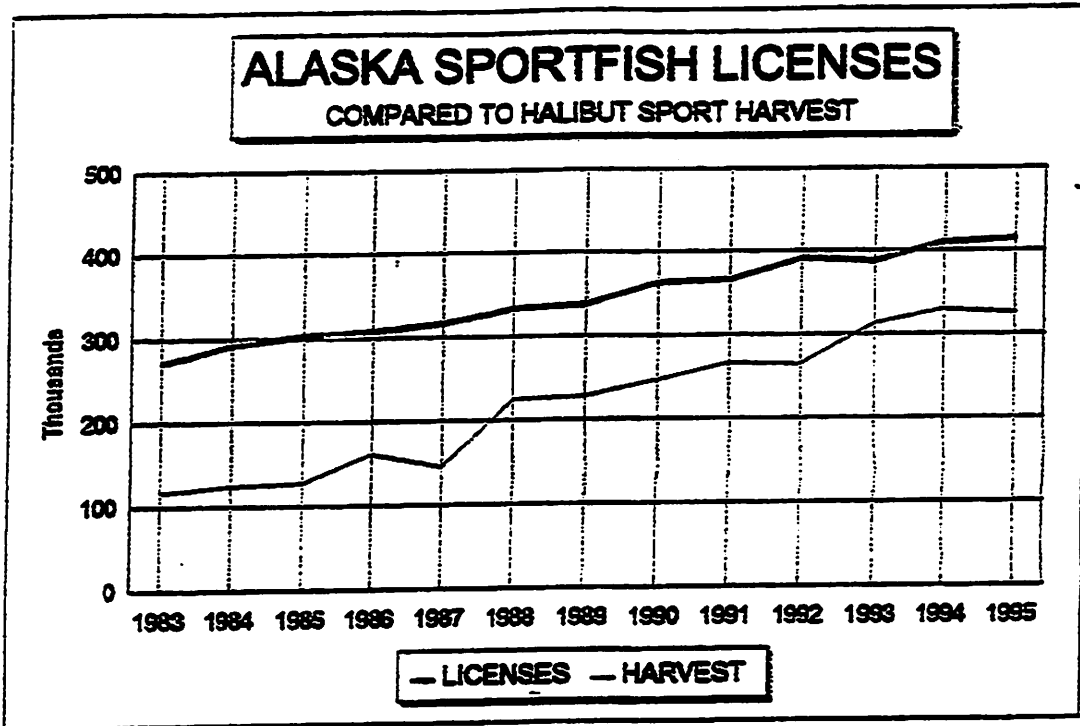


Table 3-4

**ALASKA SPORT HALIBUT HARVEST INTENSITY :  
HARVEST PER 1000 ANGLER DAYS BY REGION AND AREA**

	TOTAL ALASKA	TOTAL SOUTHEAST	Kachikan	Prince of W	Kala, etc.	Sitka	Juneau	Malina-Stra	Chukchi Bay	Yakutat
1983	67.58	131.03	99.21	63.99	149.42	179.92	172.42	47.25	153.30	70.35
1984	86.94	143.88	162.51	109.02	162.80	204.67	144.60	62.05	221.11	23.64
1985	85.88	131.85	154.96	126.94	159.37	166.43	135.97	25.31	347.35	48.51
1986	77.87	125.78	132.84	116.07	118.81	166.42	136.91	49.90	344.46	70.51
1987	87.74	116.79	115.81	89.48	81.74	165.52	125.33	77.52	304.26	82.48
1988	97.38	142.23	117.60	78.10	99.40	217.17	171.75	79.69	456.88	92.60
1989	101.15	168.53	147.86	181.86	102.83	289.29	175.74	53.90	504.10	63.58
1990	108.78	143.75	188.33	204.41	96.19	282.56	133.13	34.75	434.64	115.02
1991	108.50	162.95	99.03	251.57	133.98	297.44	119.71	30.26	399.09	123.73
1992	104.29	153.35	111.92	262.22	109.28	282.21	99.41	35.76	318.28	128.38
1993	122.36	186.29	165.44	359.76	126.29	258.41	122.04	52.69	390.46	148.09
1994	128.88	178.03	169.46	351.65	125.69	219.47	75.17	32.46	321.04	157.16
1995	118.85	172.52	189.12	343.64	179.85	212.11	93.93	24.82	280.08	123.25
GROWTH RATE	5.99%	2.88%	1.91%	15.09%	-0.22%	3.42%	-4.64%	-4.24%	3.47%	11.63%

	TOTAL SOUTH-CENTRAL	Chisana	PWS	Kat.Am Drainage	Anchorage	East-Sitka R	W. Cook Inlet W. Sushum	Kemai Peninsula	Kodiak	Naknek River Drainage	Krichuk River Drainage	Northwest
1983	61.87	0.00	73.36	0.00	0.00	0.00	0.00	105.84	98.84	6.86	0.00	0.00
1984	58.17	0.00	76.94	0.00	0.00	0.00	0.00	96.49	98.95	24.55	0.00	0.00
1985	57.92	0.00	62.30	0.00	0.00	-0.00	5.32	92.26	86.08	15.43	0.00	0.00
1986	78.29	0.00	129.60	0.00	0.00	0.00	10.23	116.86	142.03	21.78	0.00	0.00
1987	65.19	0.00	53.91	0.00	0.00	0.00	8.41	102.18	130.46	33.28	0.00	0.00
1988	100.32	0.00	115.86	0.00	0.00	0.00	10.68	168.23	111.78	37.79	0.00	0.00
1989	97.70	0.00	91.26	0.00	0.00	0.00	10.64	166.30	120.86	31.30	0.00	0.00
1990	103.47	0.00	102.62	0.00	0.00	0.00	15.19	174.43	111.93	37.88	0.00	0.00
1991	108.01	0.00	112.57	0.00	0.00	0.00	12.97	184.99	125.30	75.34	0.00	0.00
1992	102.15	0.00	157.39	0.00	0.00	0.00	8.46	170.01	128.10	43.07	0.00	0.00
1993	129.67	0.00	188.49	0.00	0.00	0.00	13.41	195.96	151.83	68.27	0.00	0.00
1994	128.29	0.00	192.00	0.00	0.00	0.00	21.71	192.35	150.41	52.31	0.00	0.00
1995	117.54	0.00	179.25	0.00	0.00	0.00	48.89	180.74	163.56	63.37	0.00	0.00
GROWTH RATE	7.01%	-	9.37%	-	-	-	-	6.83%	3.92%	15.83%	-	-

	TOTAL ARCTIC-YUK	Tanana River Drainage	Katukhina R. Drainage	Seward Peninsula / Norton Sound	Northwest Alaska	Yukon River Drainage	North Slope Brooks Range
1983	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1984	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1985	0.33	0.00	5.48	0.00	0.00	0.00	0.00
1986	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1987	0.17	0.00	2.02	0.00	0.00	0.00	0.00
1988	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1989	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1990	0.59	0.00	9.08	0.00	0.00	0.00	0.00
1991	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1992	0.18	0.00	2.29	0.00	0.00	0.00	0.00
1993	0.24	0.00	3.72	0.00	0.00	0.00	0.00
1994	0.57	0.00	2.48	3.96	0.00	0.00	0.00
1995	0.08	0.00	1.29	0.00	0.00	0.00	0.00
GROWTH RATE	ERR	-	ERR	-	-	-	-

Table 3-5

## ALASKA SPORT HALIBUT HARVEST BY ADF&G AREA

TOTAL ALASKA	TOTAL SOUTHEAST	Kachikam	Ptine of W	Kita, etc.	Sika	Jones	Malina-Sia	Glacier Bay	Yukon	
1982	177,042	41,935	6,760	1,849	4,147	7,945	18,651	1,426	535	682
1984	124,870	46,925	11,719	2,724	5,649	8,197	15,618	2,029	748	241
1985	127,637	48,117	12,600	3,073	4,757	6,094	16,695	1,023	1,355	520
1986	160,595	45,028	11,014	2,902	3,624	6,617	16,574	2,189	1,331	777
1987	145,829	44,347	9,676	2,760	3,039	7,545	14,382	3,567	2,124	1,194
1988	225,108	56,590	11,544	2,778	3,877	10,572	18,697	3,201	4,238	1,673
1989	229,016	74,304	13,689	9,213	5,548	17,727	20,273	2,588	4,494	772
1990	247,202	66,490	9,872	10,264	5,768	17,492	18,248	1,972	3,415	1,459
1991	268,523	74,038	9,733	11,875	6,433	20,288	13,537	1,199	8,766	2,112
1992	284,943	71,861	9,455	11,661	6,153	22,092	14,860	926	4,863	1,861
1993	313,147	87,779	12,763	22,901	5,994	19,366	16,340	2,195	5,878	2,752
1994	329,048	92,317	15,313	24,465	7,992	23,701	10,362	1,058	5,849	3,577
1995	325,188	91,778	14,483	20,808	9,488	21,452	15,145	866	7,050	2,456

GROWTH RATE

83-95	10.01%	7.54%	2.90%	25.86%	6.29%	12.84%	-2.15%	-4.57%	23.29%	18.87%
90-95	8.40%	7.32%	10.76%	19.92%	9.30%	3.95%	-3.04%	-9.99%	7.80%	13.97%

TOTAL SOUTH-CENTRAL	Chukchi	PNS	Kik Am Drainage	Average	East-South	W. South	Kani Peninsula	Stofit	Malina River Drainage	Kachik River Drainage	Northwest
1983	75,047	0	3,493	0	0	0	62,745	8,545	264	0	0
1984	78,045	0	4,423	0	0	0	64,469	8,179	969	0	0
1985	81,458	0	4,527	0	0	510	68,532	7,303	536	0	0
1986	115,857	0	8,331	0	0	1,072	94,479	10,960	1,015	0	0
1987	101,446	0	4,379	0	0	969	84,733	9,869	1,596	0	0
1988	168,526	0	9,845	0	0	1,192	147,756	7,749	1,984	0	0
1989	154,712	0	8,697	0	0	1,224	132,944	10,435	1,412	0	0
1990	180,569	0	10,851	0	0	1,685	155,353	9,134	2,546	0	0
1991	192,485	0	12,733	0	0	1,576	160,838	12,089	5,199	0	0
1992	193,049	0	17,355	0	0	984	160,705	10,860	2,646	0	0
1993	225,314	0	19,716	0	0	2,507	185,431	14,189	3,491	0	0
1994	236,609	0	23,487	0	0	2,725	193,055	14,910	2,402	0	0
1995	238,389	0	24,771	0	0	3,236	188,597	13,989	2,796	0	0

GROWTH RATE

83-95	11.19%	-	18.24%	-	-	-	11.00%	5.15%	19.01%	-	-
90-95	6.05%	-	18.91%	-	-	18.18%	4.78%	9.03%	-4.38%	-	-

TOTAL	ANADYUK	Tuzena River	Kachikam R.	east Ptine	Northwest	Yukon River	North Slope
Drainage	Drainage	Drainage	North-South	Alaska	Drainage	Drainage	Drainage
1983	0	0	0	0	0	0	0
1984	0	0	0	0	0	0	0
1985	62	0	62	0	0	0	0
1986	0	0	0	0	0	0	0
1987	36	0	36	0	0	0	0
1988	0	0	0	0	0	0	0
1989	0	0	0	0	0	0	0
1990	144	0	144	0	0	0	0
1991	0	0	0	0	0	0	0
1992	33	0	33	0	0	0	0
1993	54	0	54	0	0	0	0
1994	120	0	45	75	0	0	0
1995	21	0	21	0	0	0	0

GROWTH RATE

83-95	-	-	-	-	-	-	-
90-95	-	-	-	-	-	-	-

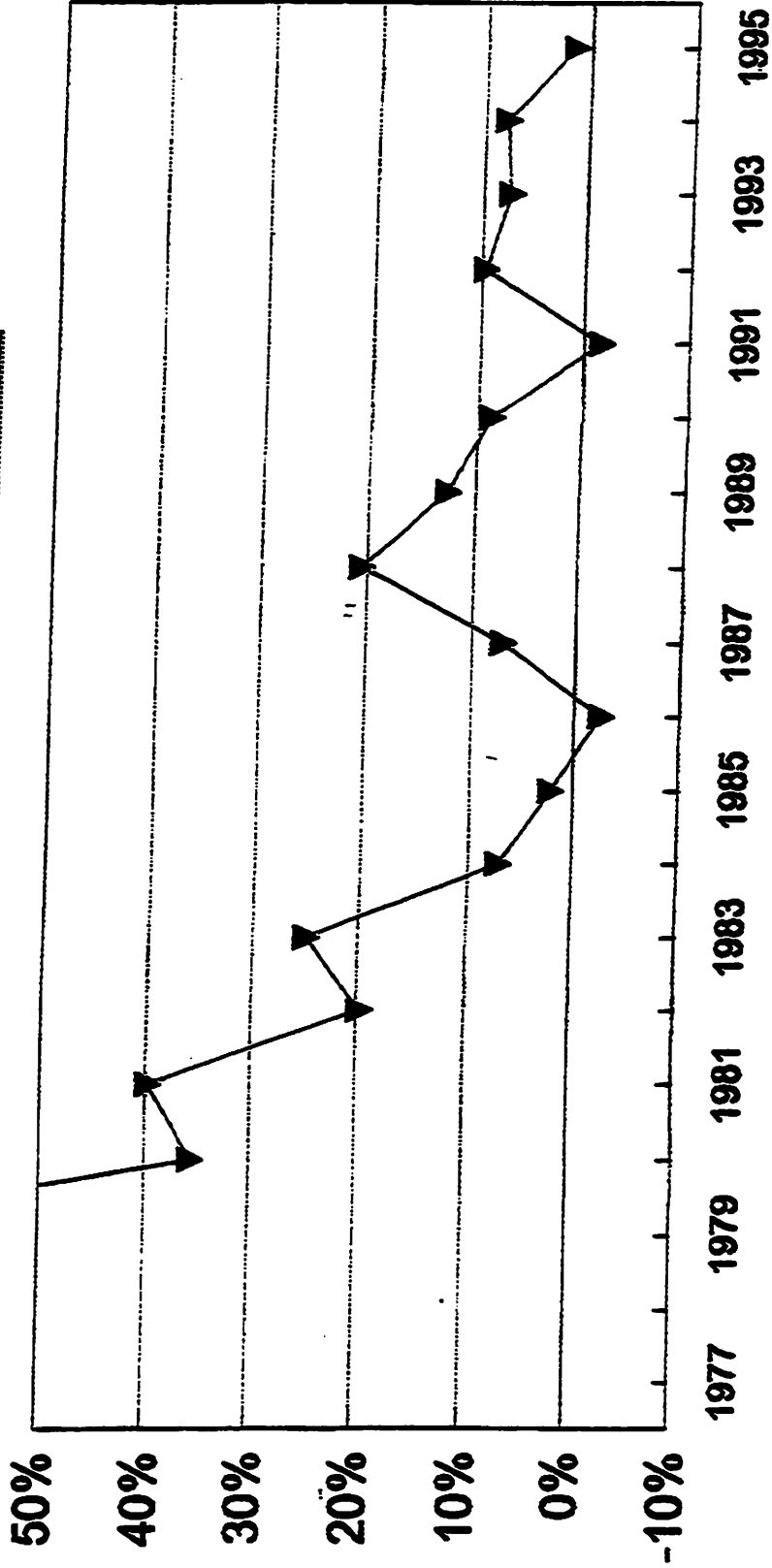
APPENDIX A46

Harvest, Catch, and Participation in Alaska Sport Fisheries : Annual, Alaska Department of Fish and Game



Figure 3-3

**HALIBUT SPORT HARVEST  
ANNUAL GROWTH RATE: MA3**



▼ 2C

Figure 3-3 continued

**HALIBUT SPORT HARVEST  
ANNUAL GROWTH RATE: MA3**

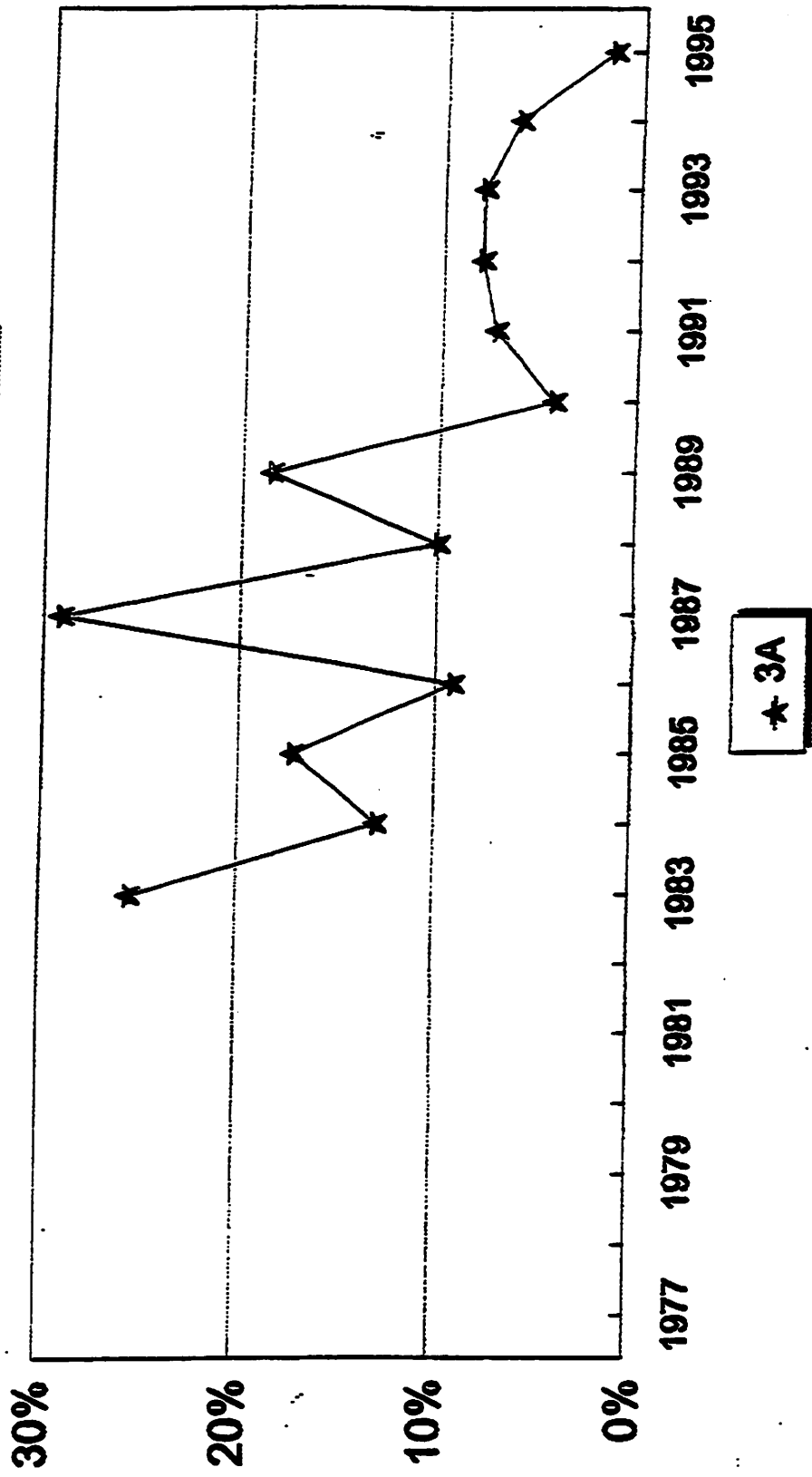
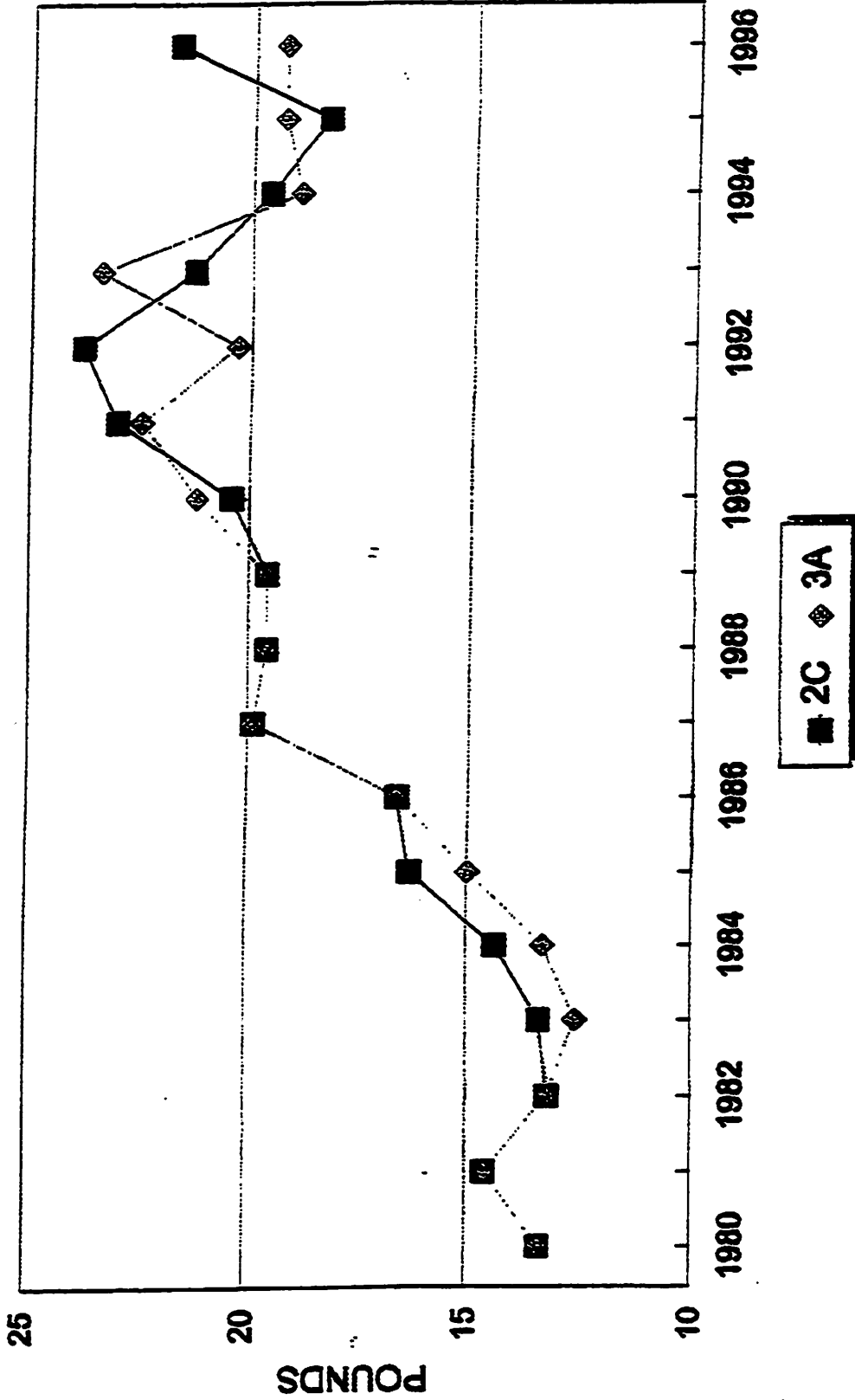


Figure 3-7

# ALASKA SPORT HARVESTED HALIBUT: AVG NET WEIGHT



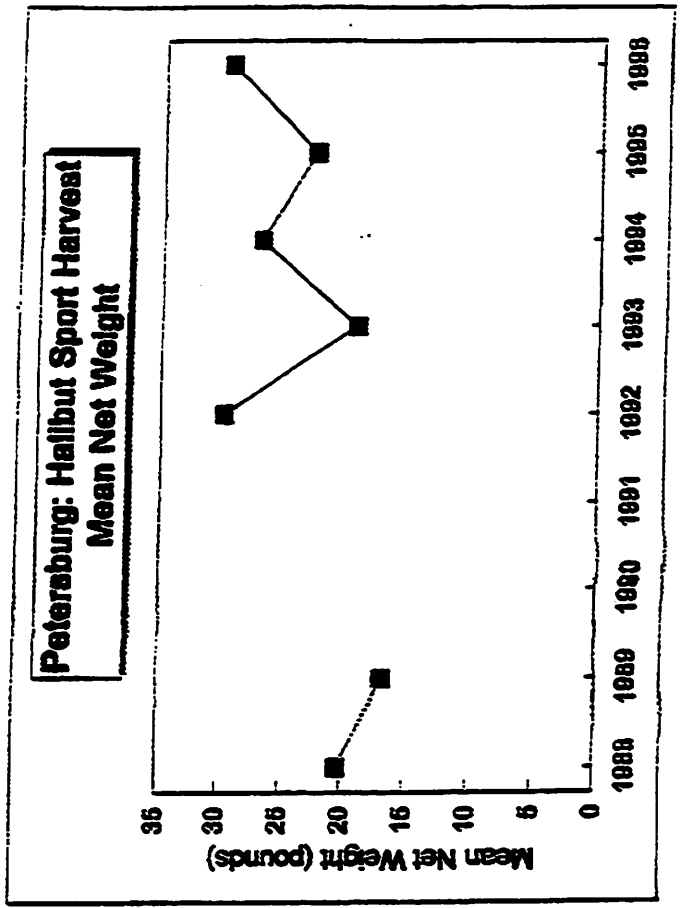
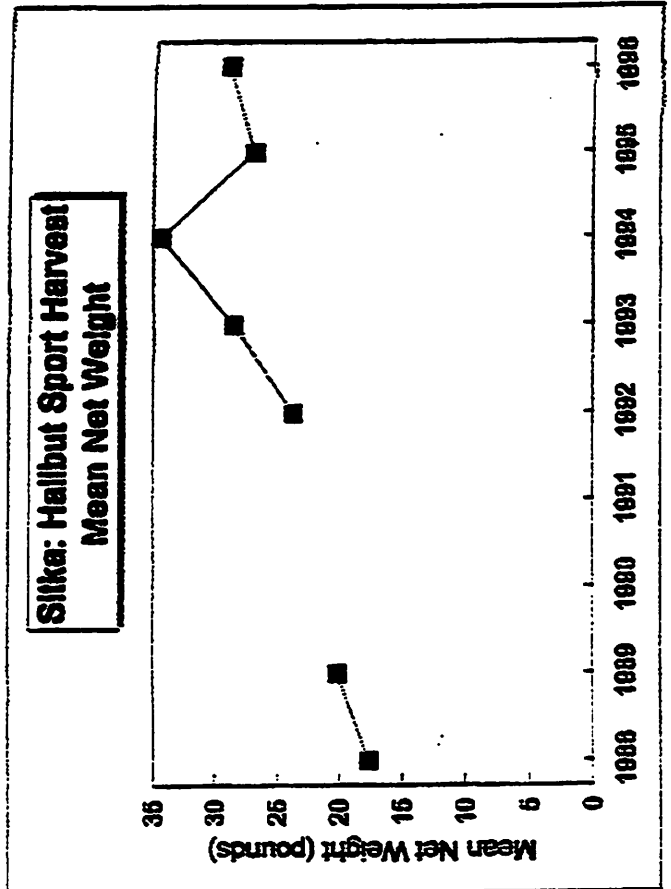
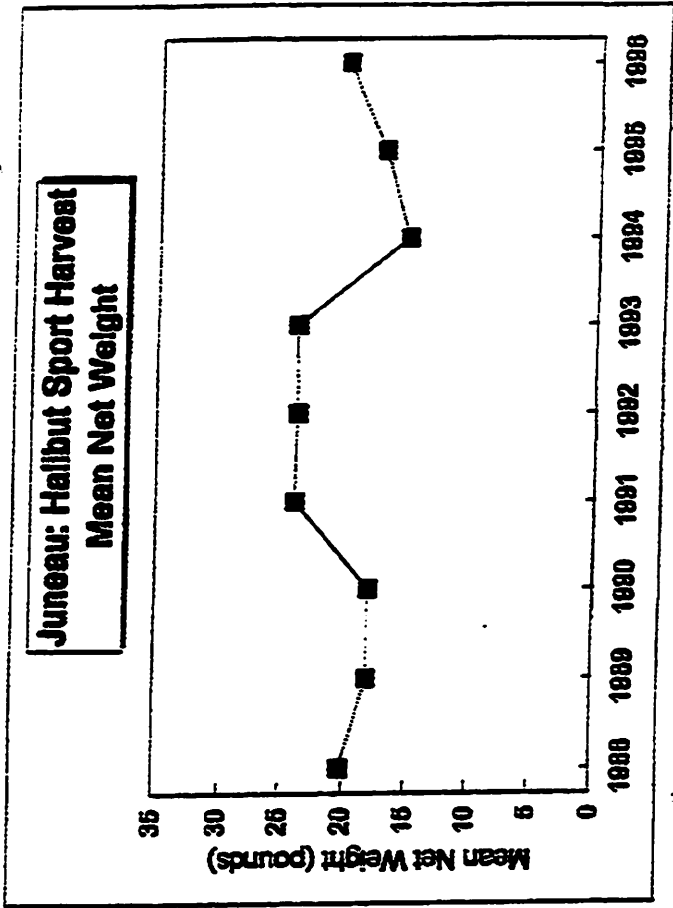
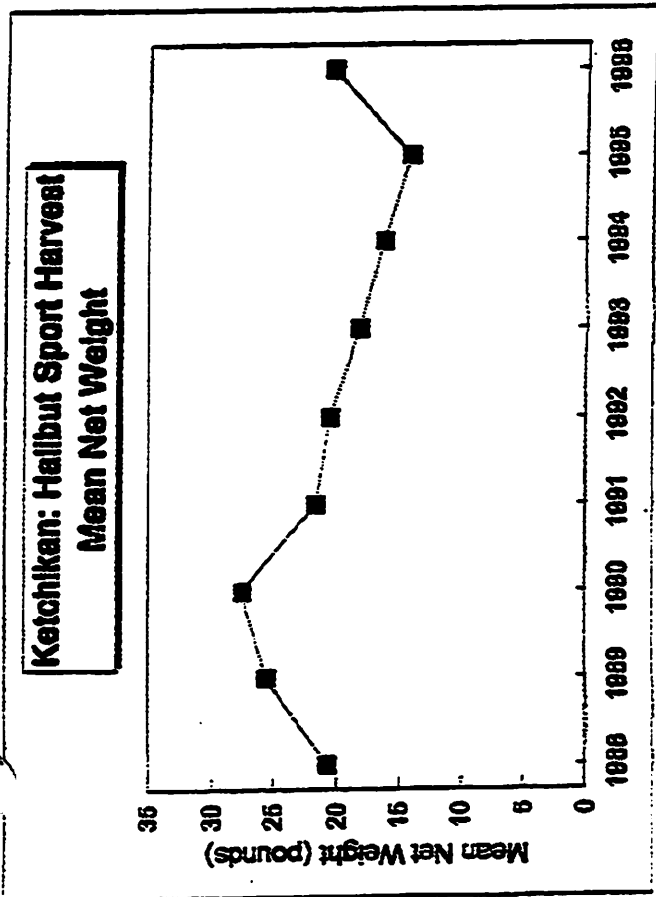


Figure 3-9

**1995 GUIDED HALIBUT HARVEST  
BY RESIDENCE OF ANGLER**

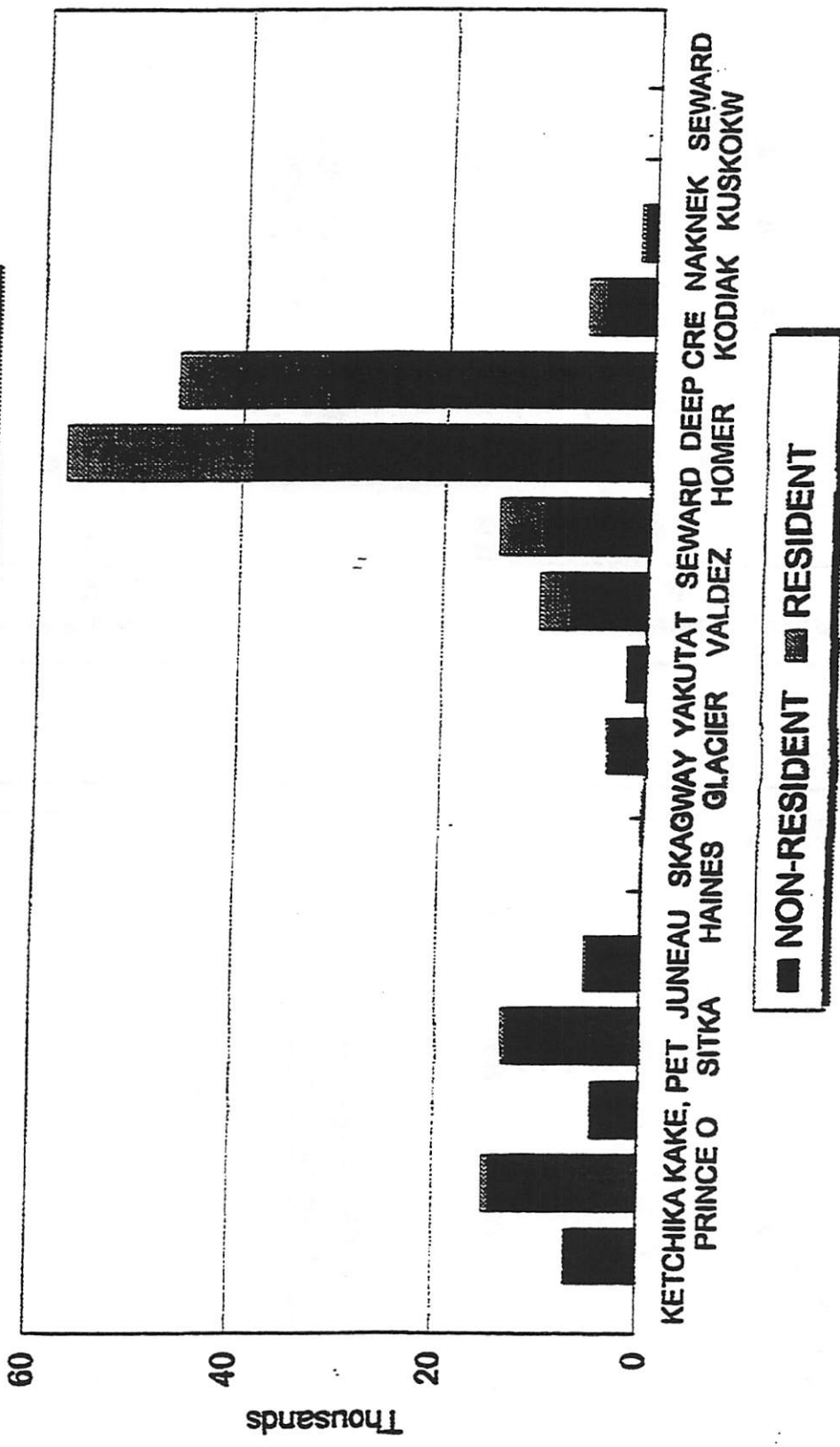


Figure 3-10

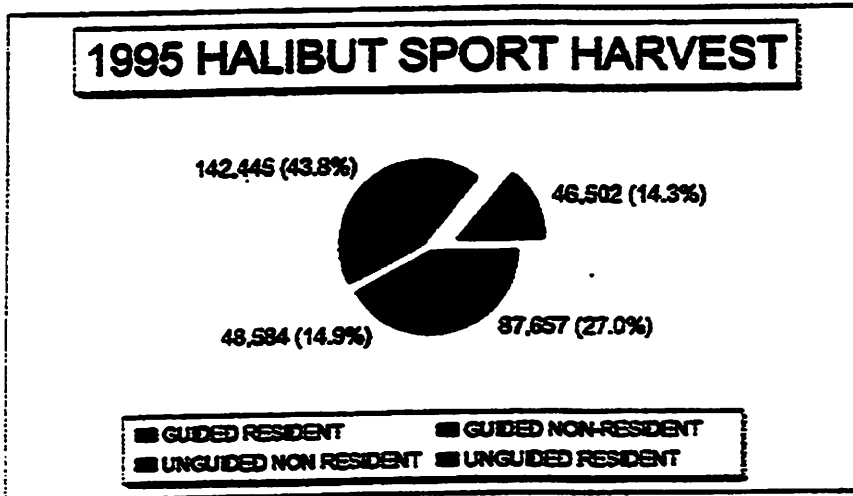
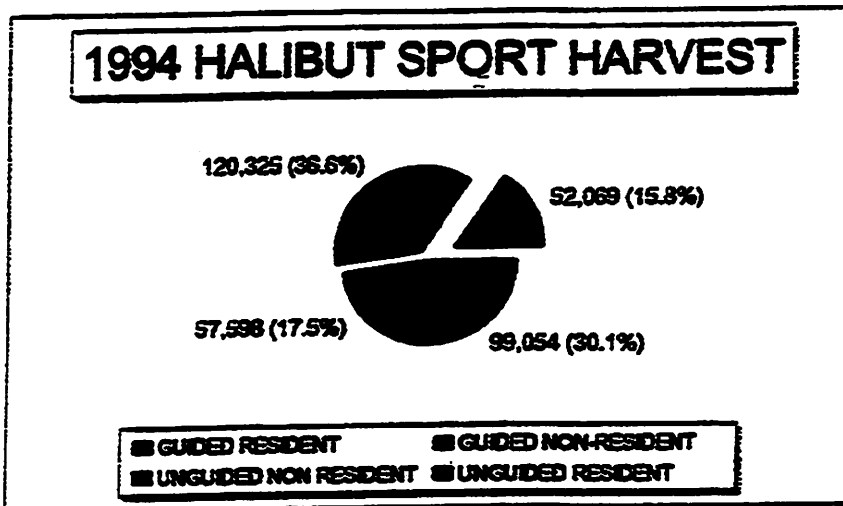
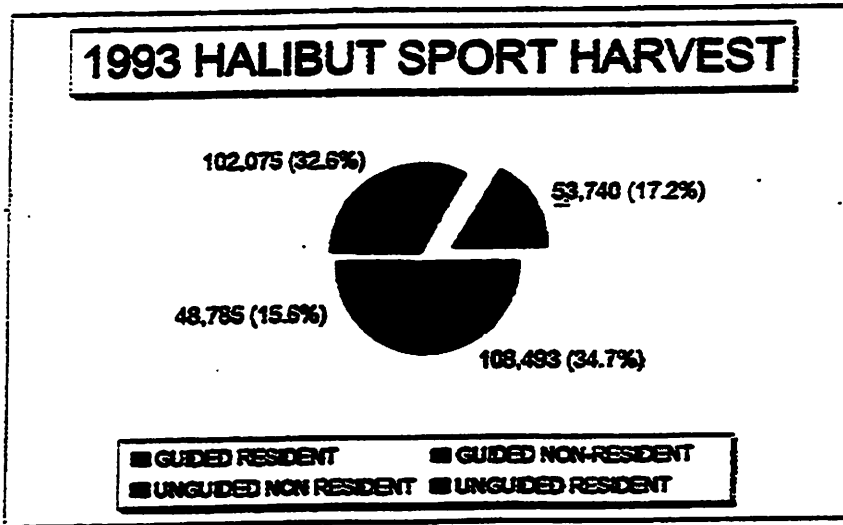


Figure 3-11

**KENAI PENINSULA**

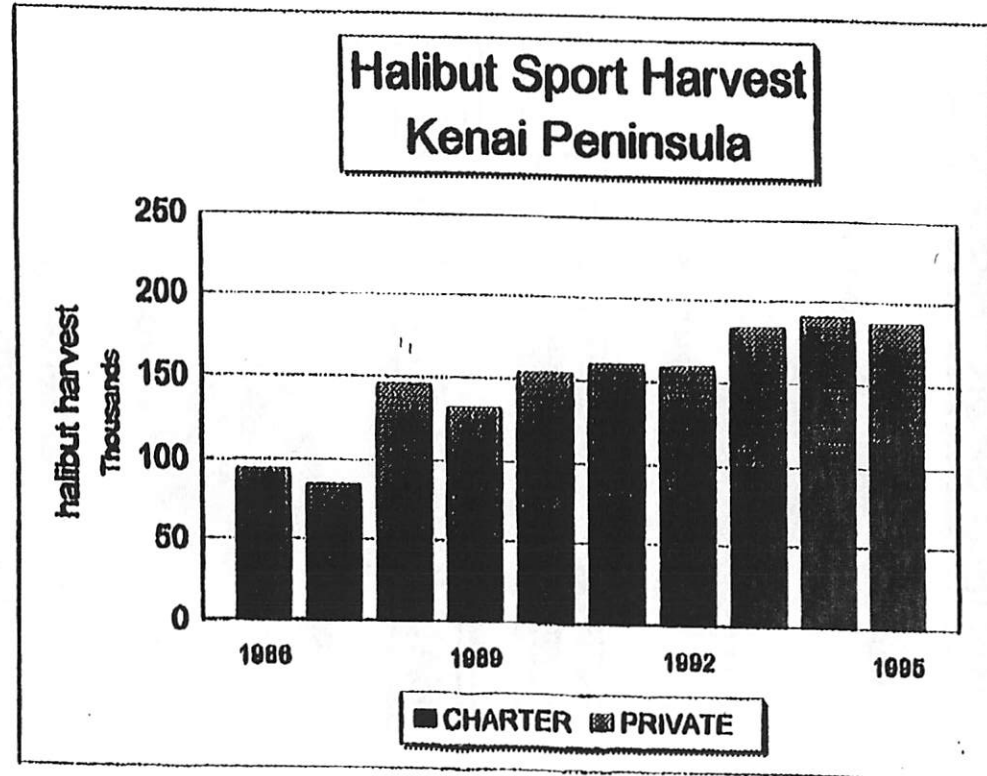
SEWARD, HOMER, DEEP CREEK, NINILCHIK, ANCHOR POINT

**HALIBUT HARVEST**

	charter	non-charter
-	-	42,486
1983	-	62,745
1984	-	64,469
1985	-	68,582
1986	27,736	66,743
1987	26,858	57,875
1988	55,462	92,294
1989	51,553	81,391
1990	70,076	86,277
1991	78,664	82,224
1992	83,157	77,548
1993	99,191	86,240
1994	107,907	85,178
1995	114,468	74,129

**GROWTH RATE**

86-95	17.7%	1.9%
90-95	10.8%	-1.5%



42

Table 3-10

# HALIBUT SPORT HARVEST

## DATA ON ANGLERS AND HARVEST SOUTHCENTRAL PORTS

1993	boat trips	angler days	harvest	anglers per boat	harvest per boat	harvest per angler
lower cook inlet	213	1310	2123	6.15	9.97	1.62
central cook inlet						
kodiak	429	1349	1215	3.14	2.83	0.90
seward	311	1411	1223	4.54	3.93	0.87
seward military	822	7292	6487	8.87	7.89	0.89
valdez	346	1627	1717	4.70	4.96	1.06
whittier						
cordova						
<b>1994 Private Trips</b>						
lower cook inlet	220	741	818	3.37	3.72	1.10
central cook inlet	236	724	863	3.07	3.66	1.19
kodiak	380	1106	987	2.91	2.60	0.89
seward	288	844	950	2.93	3.30	1.13
seward military	924	8169	6129	8.84	6.63	0.75
valdez	198	647	523	3.27	2.64	0.81
whittier						
cordova						
<b>1994 Charter Trips</b>						
lower cook inlet	291	2249	4173	7.73	14.34	1.86
central cook inlet	103	523	898	5.08	8.72	1.72
kodiak	116	507	631	4.37	5.44	1.24
seward	121	1008	1220	8.33	10.08	1.21
seward military						
valdez	210	1315	1756	6.26	8.36	1.34
whittier						
cordova						



Table 3-11

**1993 NON-RESIDENT SPORTFISHING TRIPS**

**HOUSEHOLD TRIPS TO SALTWATER SITES**

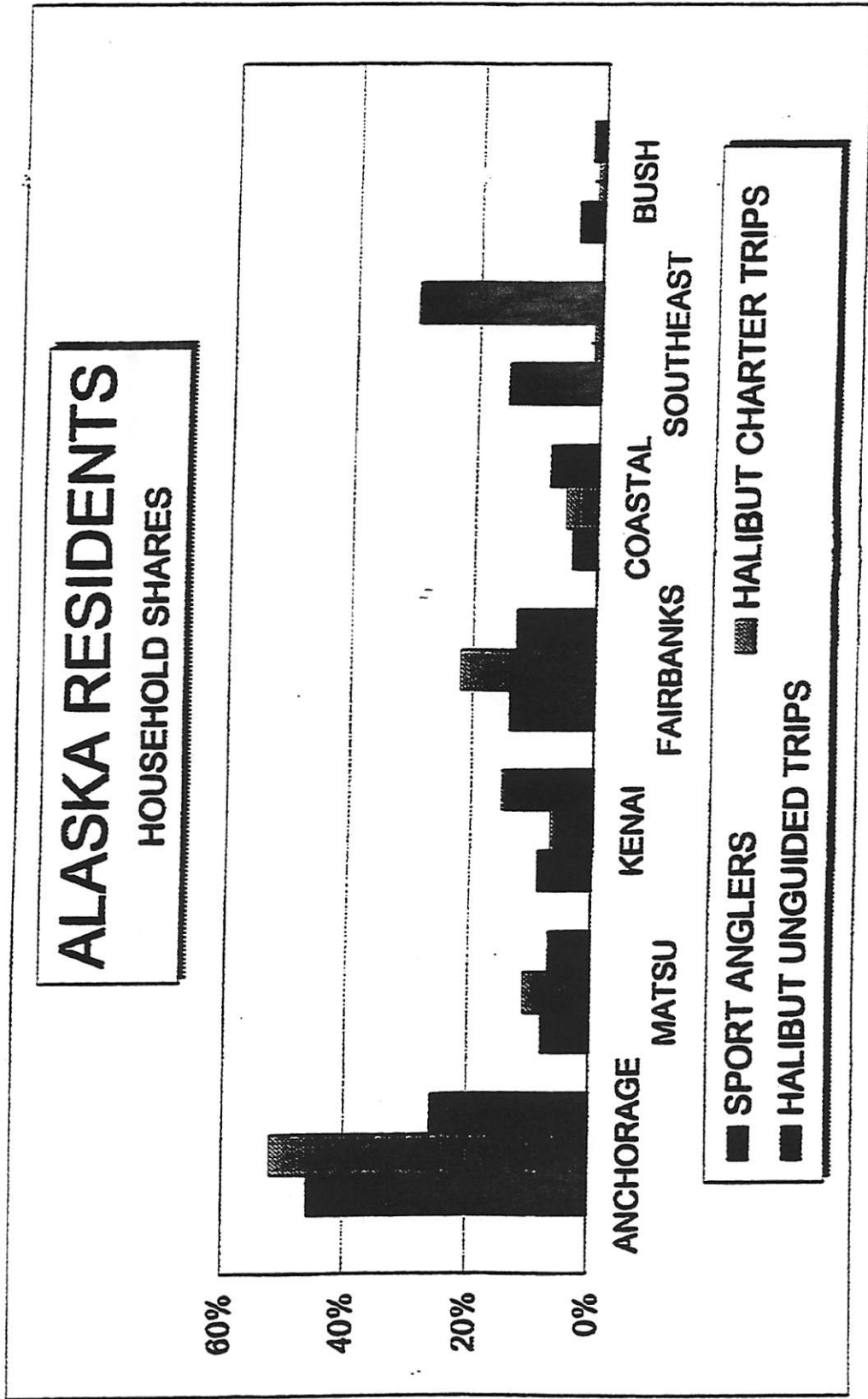
					% OF TOTAL		
		NON- GUIDED	GUIDED	TOTAL	NON- GUIDED	GUIDED	TOTAL
<b>SALT WATER TRIPS</b>							
HALIBUT	CASUAL	7,365	12,755	20,120	19.1%	33.0%	52.1%
	AVID	6,511	12,008	18,519	16.9%	31.1%	47.9%
	TOTAL	13,876	24,763	38,639	35.9%	64.1%	100.0%
OTHER	CASUAL	12,728	9,900	22,628	36.1%	28.1%	64.2%
	AVID	7,658	4,937	12,595	21.7%	14.0%	35.8%
	TOTAL	20,386	14,837	35,223	57.9%	42.1%	100.0%
TOTAL	CASUAL	20,093	22,655	42,748	27.2%	30.7%	57.9%
	AVID	14,169	16,944	31,113	19.2%	22.9%	42.1%
	TOTAL	34,262	39,599	73,861	46.4%	53.6%	100.0%

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HALIBUT9.WK4

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Figure 3-12



**APPENDIX I**

**Valdez Charterboat Association Proposal  
12/14/96**

# **Halibut Management Proposal International Pacific Halibut Commission**

**12/14/96**

**Page 1**

## **Proposed by:**

**Valdez Charter Boat Association  
P.O. Box 2850  
Valdez, Alaska 99686  
Contact ph. # 907-479-5562**

## **Brief Statement of proposal:**

**This proposal requests the commission to restore guided and non guided sportfish bag limits from the current 2 fish per day and 4 in possession, to 3 fish per day 6 in possession.**

## **Objective of Proposal: (what is the problem?)**

**With the proposed increase in commercial catch by the proposed 36%, this would be the only way to allow Sportfishermen to increase their catch. Sportfishermen simply can not excess the increase in harvest any other way.**

## **Need and Justification for Commission Action: (Why can't the problem be resolved through other channels?)**

**The International Pacific Halibut Commission is the management body authorized to instruct the Department of Fish and Game of the State of Alaska for sportfish bag limits changes.**

**Further, the smaller size of the average halibut, due to commercial fishing practices, is reducing the meat in the freezer for the general public.**

# **Halibut Management Proposal International Pacific Halibut Commission**

**12/14/96**

**Page 2**

**Proposed by:**

**Valdez Charter Boat Association  
P.O. Box 2850  
Valdez, Alaska 99686  
Contact ph. # 907-479-5562**

**What Will Happen if Nothing is Done?**

**Sportfishermen will not be able to harvest their fair share of the halibut stocks. This will also be a windfall to commercial fishermen.**

**Who is Likely to Benefit?**

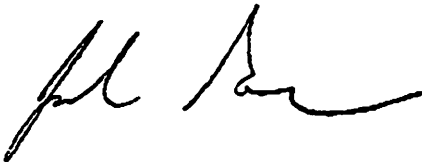
**The general public.**

**Who is Likely to Suffer?**

**No one, due to the health of the bio-mass.**

**Other Solutions Considered:**

**No increase to any user groups over 1996 levels.**



**John Goodhand, President  
Valdez Charter Boat Association**

From: Don N. Bunker  
F/V Rio Bravo  
P.O. Box 604  
Anchor Point, Ak. 99556

Didn't appear -  
not handed out

C-3

To: North Pacific Fishery Management Council  
605 W. 4th # 306  
Anchorage, Ak. 99501-2252

Subject: Halibut and the Guided Sport Fishing Fleet

Dear council members:

I fish out of the Homer Small Boat Harbor. I started chartering halibut in 1990. I also own halibut QS and fish halibut commercially. When the IFQ system of harvesting Halibut was implemented in the commercial fleet, Quota Shares and subsequently IFQ pounds were issued on very accurate records gathered from fish tickets. The fish tickets reflect only the pounds and not the number of fish. IPHC bases the biomes on pounds. The guided sport fleet started using log books during the 1998 season and reported number of fish and not pounds. Two different measuring systems are used. This information is very likely not accurate, it is not verifiable, and could be biased. It should be highly suspect knowing the information would be used to establish some form of harvest limits such as IFQ, etc. in the future .

I foresee several problems if the guided halibut sport fleet is allocated pounds. How will any plan be enforced? It will require many enforcement officers to verify the catch of each charter before it is off loaded. Using pounds as a unit to limit halibut harvested by the charter fleet will encourage the harvest of small fish. A visit to the Homer Small Boat Harbor during the summer will indicate hundreds if not thousands of Chicken Halibut (less than 32") harvested by the charters daily. This is a gross waste of the resource. If the Charter fleet is allocated X number of pounds, they could kill the same number of fish as the commercial fleet and harvest only a small percent of pounds.

The skippers and deck hands on sport charter vessels are allowed to catch their daily limits. The charter companies place these fillets in the freezers. This represents thousands of pounds of halibut fillets annually. It is very easy for this sport caught halibut to migrate into the wholesale market. Please consider a regulation that prohibits skippers and deck hands from retaining fish when chartering.

The commercial halibut fleet has a minimum legal size of 32". I urge you to please implement a minimum size limit of 32" for all user groups. Allow the baby halibut to gain weight and mature. This will have positive long reaching affects including increased brood stock, increased pounds to the biomass, and the charter clients will be more pleased catching larger fish for their freezer.

I feel the most simple, logical, and enforceable method of controlling the halibut sport charter fleet is a limited entry permit or a moratorium. These are the traditional systems used by the State of Alaska.

Thank you for you time.

Sincerely

Don N. Bunker

**FRANK H. MURKOWSKI**  
ALASKA

**COMMITTEES:**

**CHAIRMAN**

**ENERGY AND NATURAL RESOURCES**

**FINANCE**

**VETERANS' AFFAIRS**

**INDIAN AFFAIRS**

**United States Senate** C-3

WASHINGTON, DC 20510-0202

(202) 224-6685

(202) 224-5301 FAX

222 WEST 7TH AVENUE, BOX 1  
ANCHORAGE, AK 99513-7570  
(907) 271-3735

101 12TH AVENUE, BOX 7  
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(907) 456-0233

P.O. Box 21647  
JUNEAU, AK 99802-1647  
(907) 586-7400

130 TRADING BAY ROAD, SUITE 350  
KENAI, AK 99811-7716  
(907) 283-5808

109 MAIN STREET  
KETCHIKAN, AK 99901-6489  
(907) 225-6880

851 E. WESTPOINT DRIVE, SUITE 307  
WASILLA, AK 99654-7142  
(907) 376-7665

November 17, 1999

Mr. Otto Florschutz  
Post Office Box 547  
Wrangell, AK 99929

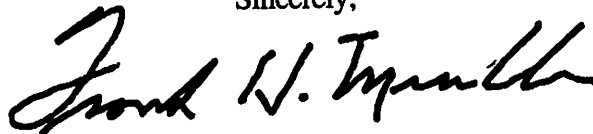
Dear Otto:

I thank you for contacting me to share your comments on the North Pacific Fishery Management Council's review of possible action on halibut charter vessels. I am aware that this matter has generated a great deal of controversy.

I understand the suggestion of a fixed allocation for charter operators was made by the director of the State Division of Sport Fish. For my part, I do not believe that is appropriate. This is, at bottom, an allocation dispute between two types of commercial business operators with the potential for conflict in some areas. I believe the Council is the appropriate arena for this discussion, but to give one party a guarantee of a certain catch level while the other party remained responsible for all reductions necessary for conservation is both unbalanced and unfair.

Thank you again for contacting my office.

Sincerely,



Frank H. Murkowski  
United States Senator

PUBLIC COMMENT OF BRUCE J. GABRYS GIVEN AT NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL MEETING ON DECEMBER 11, 1999 C-3

Good (morning/afternoon) Mr. Chairman and committee members, thank you for this opportunity to speak today. My name is Bruce Gabrys, representing myself, and my fishing family. I've lived in Eagle River for twenty years and have fished Cook Inlet and the Gulf of Alaska as a sport and commercial fisherman the entire time.

I have commercially fished halibut before it became a "Derby" fishery, during the "Derby" years, and continue to fish halibut under the IFQ system. Implementation of the IFQ system has provided a significant level of economic stability to the industry that did not previously exist. Because of this stability we have invested heavily in halibut IFQ. The economic stability of the halibut fishery is particularly important today with the commercial salmon industry in economic disrepair. I, like many other fishermen, cannot afford an economic derailment of the halibut fishery.

I attended both the SSC and AP sessions on the "Council Review Draft." In order to continue the public process, I ask that the Counsel release the document for public review but accompany it with the comments from the SSC and the AP.

I am in favor of a viable and professional Halibut Charter Fleet for a couple of reasons. First of all, we are neighbors in the community and on the water. Good neighbors work together and help each other. Second, I want halibut charter clients to have the best experience possible, so that ever time they go to a restaurant and see halibut on the menu, or halibut in the cooler at the store, they have this positive mental image of the product and buy it! Probably will give them a reason at dinner to tell that fish story again, as well.

A positive image of the halibut industry, both charter and commercial, come from the participants in the fishery that demonstrate a conservation minded, efficiently managed fishery which provides for harvests levels based upon the abundance of the resource. A prolonged decision process on the GHL/Moratorium alternatives will only serve to hurt the industry.

In February I'll be back asking that you approve the GHL as set by the council in 1997 and that it be set as a percentage of the annual available biomass. With implementation of a GHL, the Halibut Charter Fleet located in overcapitalized areas of the state (i.e. Kenai Peninsula and South East) will need the protection provided by a moratorium. Approval of the "local moratorium" option in these areas is appropriate.



As a final comment, I ask that the Council consider an additional step in the evolution of the Halibut Charter GHL. Once the GHL is established, there appears to be no method to adjust the relative amount of harvest dedicated to either the commercial fleet or the charter fleet. Economics drive the demand for fish products harvested by the commercial fleet, and the demand for charter boat services. The people's willingness to pay for these goods or services should drive allocation. If the GHL could be converted into some form of Individual Fishing Quota (IFQ) for each charter operator, then the "Free Market" would allow the industry to move to economic efficiency. Additionally, I believe that quota shares should be transferable, by open market sales, between the charter and commercial fleets. This would allow the "Free Market" to determine the appropriate allocation of the resource based upon demand of the consumer.

Thank you for your time and attention. May God bless all of you and have a very Merry Christmas.

# Petersburg Vessel Owners Association

d-3

P.O. Box 232  
Petersburg, Alaska 99833  
Phone (907) 772-9323 Fax (907) 772-4495

December 11, 1999

## **C-3: Halibut Charter GHL: PVOA Recommendations on Initial Review of Analysis**

### **PVOA Supports:**

- 1.) Council intent as expressed in the GHL as passed in 1997 after four years of Council consideration. This GHL is an abundance based percentage of the combined commercial quota and charter harvest based on 125% of the 1995 charter harvest.
- 2.) The GHL passed in 1997 is not presently constraining the charter fleet in 3-A nor 2-C (subject to data qualifications) and allows for growth room.
- 3.) Council intent is to use the GHL to trigger management measures in the following year(s) once the GHL is reached. The management measures are intended to keep the charter fleet under the GHL while providing an uninterrupted season of historic length.
- 4.) These two goals require effective and appropriate management measures. In October, the SSC noted their concern as to the effectiveness of management measures under consideration as well as the lack of in-season management measures.
- 5.) Management and moratorium measures may differ by area to take into account different abundances and use patterns. Duration for review of measures should be tied to the existence of the duration of the GHL.

### **PVOA Does Not Support:**

- 1.) Status quo or no action. Council needs to move forward.
- 2.) Fixed directed harvest amounts unrelated to abundance.
- 3.) GHL based on 125% of the 1998 harvest particularly in 2-C.
- 4.) Use of anomalous 1998 data such as the average weight of charter halibut in 2-C.
- 5.) Excessive banking or accumulation of reserves of uncaught fish.

### **Recommended Additions to the Analysis:**

1.) Additional management measures such as those in the SEAK Chinook Mgmt. Plan. Measures should be assessed quantitatively (if possible) and qualitatively. These measures are to be used only if necessary to stay under the GHL and provide a continuous season:

- a.) Prohibit guides and crew from retaining halibut while on charter.
- b.) Prohibit guides and crew from fishing and retaining halibut while on charter.
- c.) Ban use of downriggers.
- d.) Changes in possession limit.

2.) A table comparing proposed alternatives and relationship of effectiveness in addressing the elements of the problem statement.

3.) Analysis of allocational impacts on the longline sector from a fixed charter harvest (unrelated to abundance) and particularly in years of low abundance.

4.) Analysis of impacts as to local depletion from a fixed charter harvest (unrelated to abundance) in years of low abundance (such as experienced in the 1980's).

5.) Equitable and comparable assessment of socio-economic impacts of alternatives on both sectors. In general, there is much more information provided in the analysis regarding the charter fishery than the commercial fishery. The SSC notes "Overall, the analysis does not provide as comprehensive an evaluation of the commercial sector." This imbalance can lead to the improper assumption that the charter fishery provides greater economic benefits simply because more data is presented.

**Example:** The status quo alternative of no limit on charter harvest ( i.e. no GHL, no moratoriums, no LAMPs etc.) only includes a minimal estimate of loss of ex-vessel value on the commercial longline fleet. This does not take into account the loss of IFQ value and equity, effect on outstanding loans, loss of raw fish taxes for communities, etc.

**Recommended Deletions from the Analysis:**

1.) Consideration of alternatives based on fixed harvest amounts unrelated to abundance.

2.) Consideration of alternatives based on 125% of 1998 harvest particularly in 2-C.

**General Recommendations:**

1.) Move the analysis forward with suggested modifications for public review.

2.) Incorporate modifications including those suggested by the SSC and AP.

3.) At an appropriate time, initiate a separate discussion paper on the SSC recommendation to consider IFQs in the charter industry. An appropriate time may be subsequent to final action and also depends upon staff work load.

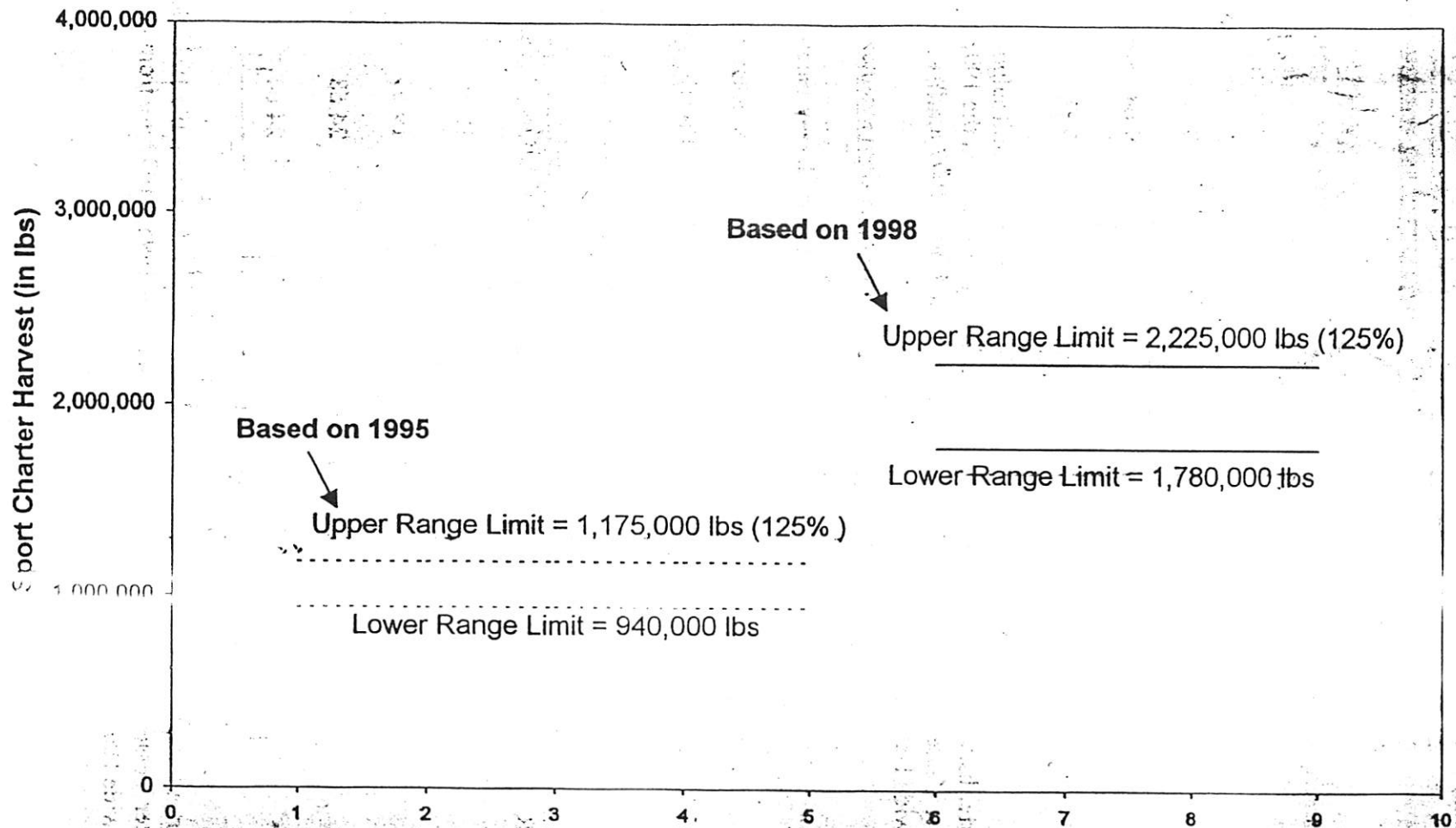
## Problems With the Alternatives

1.) Fixed Harvest Amount: Does not vary with abundance. In years of low abundance, the charter fleet would be allocated half the quota.

2.) Basing the GHL on the 1998 Charter Harvest: The 1998 logbook data contains many anomalies. It doubles the 2-C charter harvest.

3.) Inadequate Management Measures: If less than meaningful measures are adopted, the GHL will be repeatedly exceeded and this issue will be continually on the Council agenda.

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



2-C COMMERCIAL QUOTA

1979 - 1999

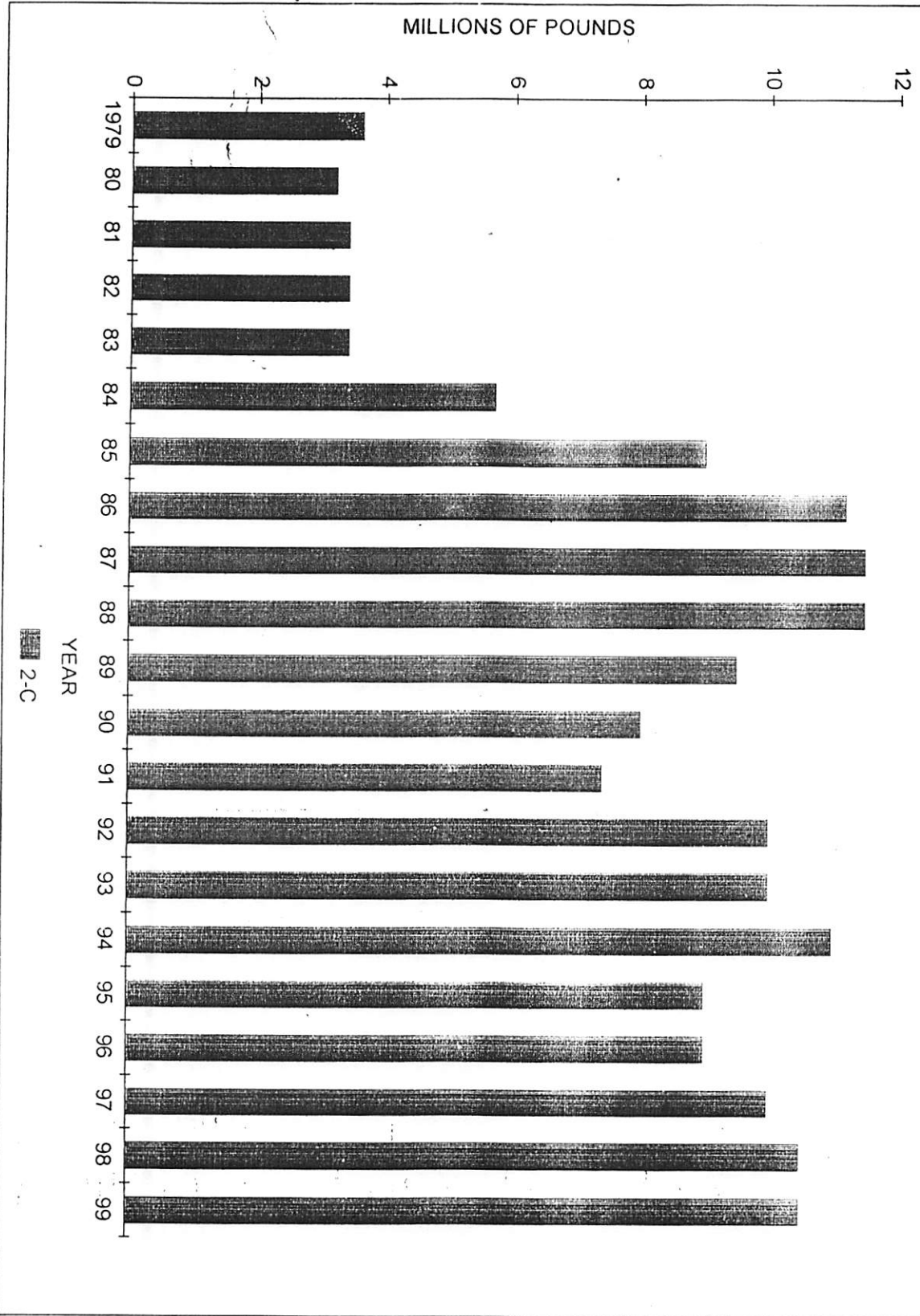
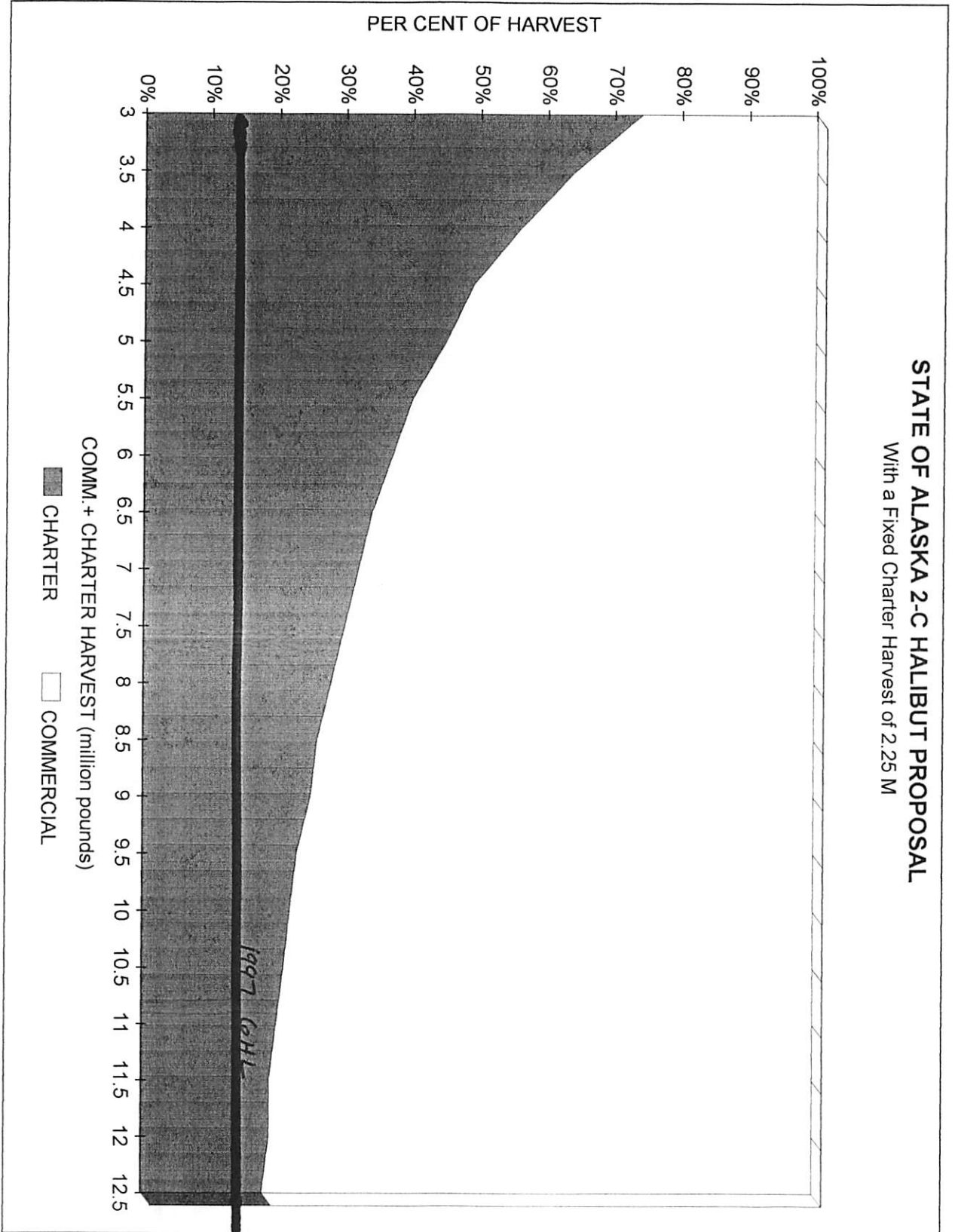


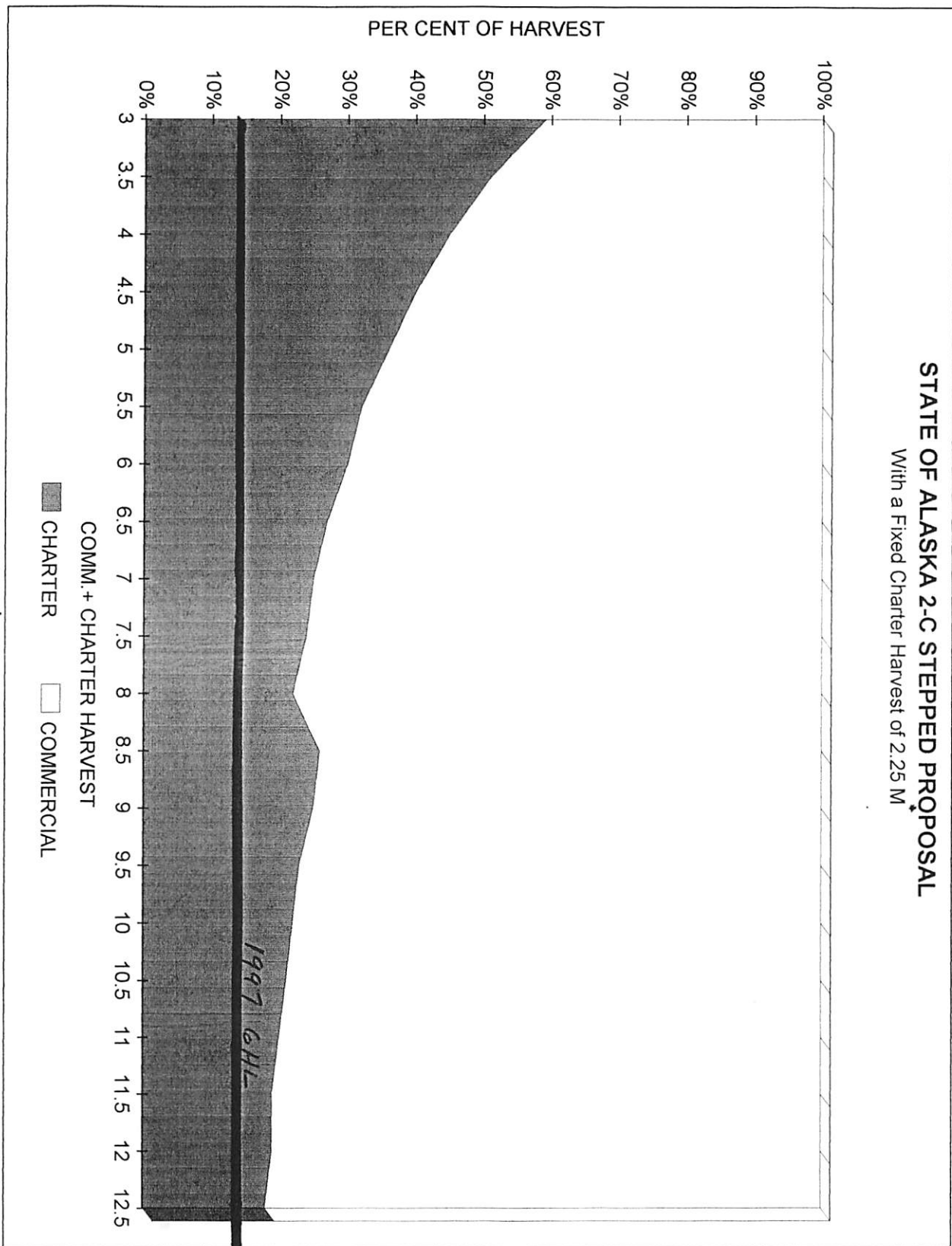
FIGURE 12



(12)

1997  
GHL

Figure 13

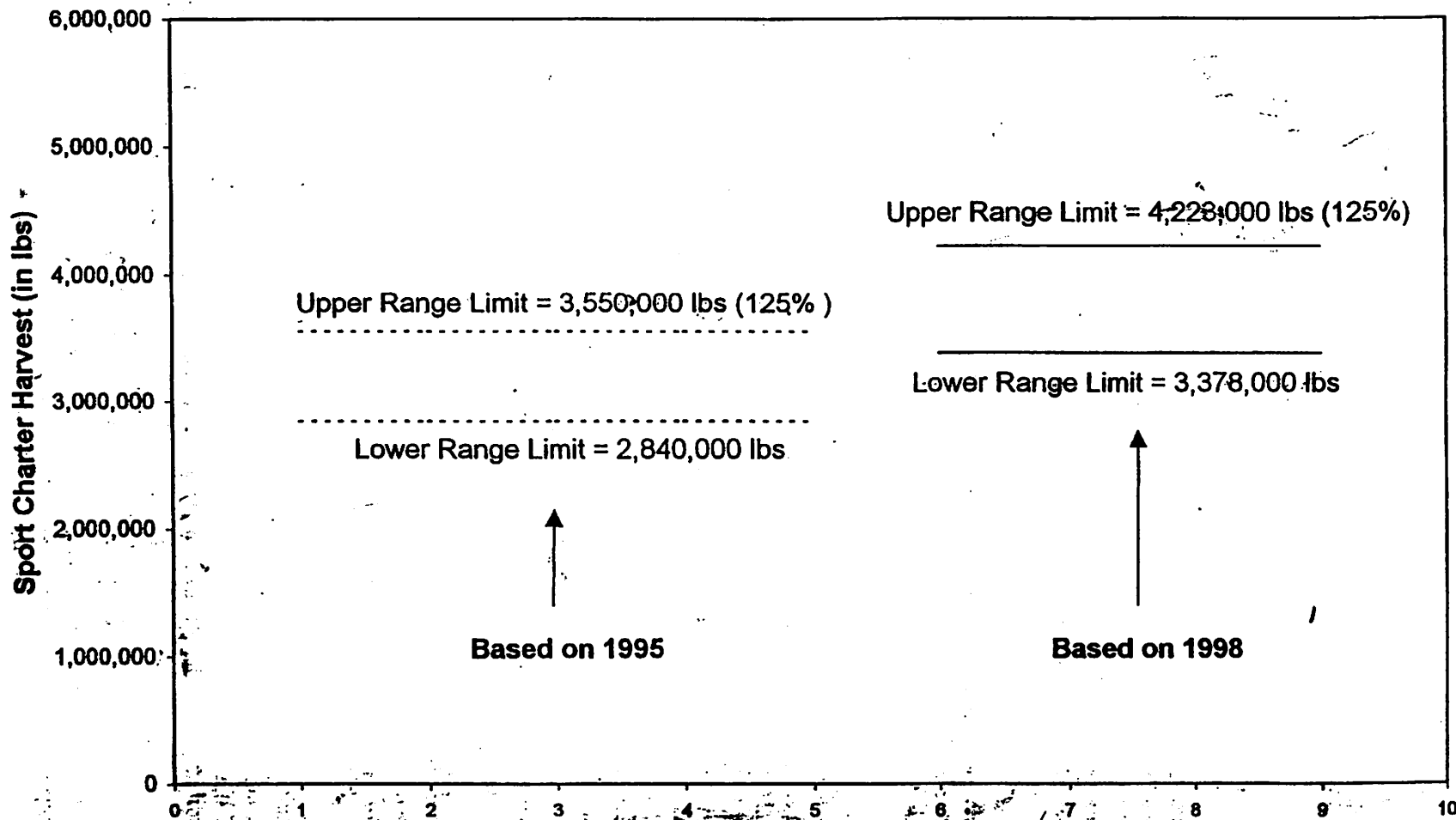


1997  
CHL

(13)



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



3-A COMMERCIAL HALIBUT QUOTA  
1979 - 1999

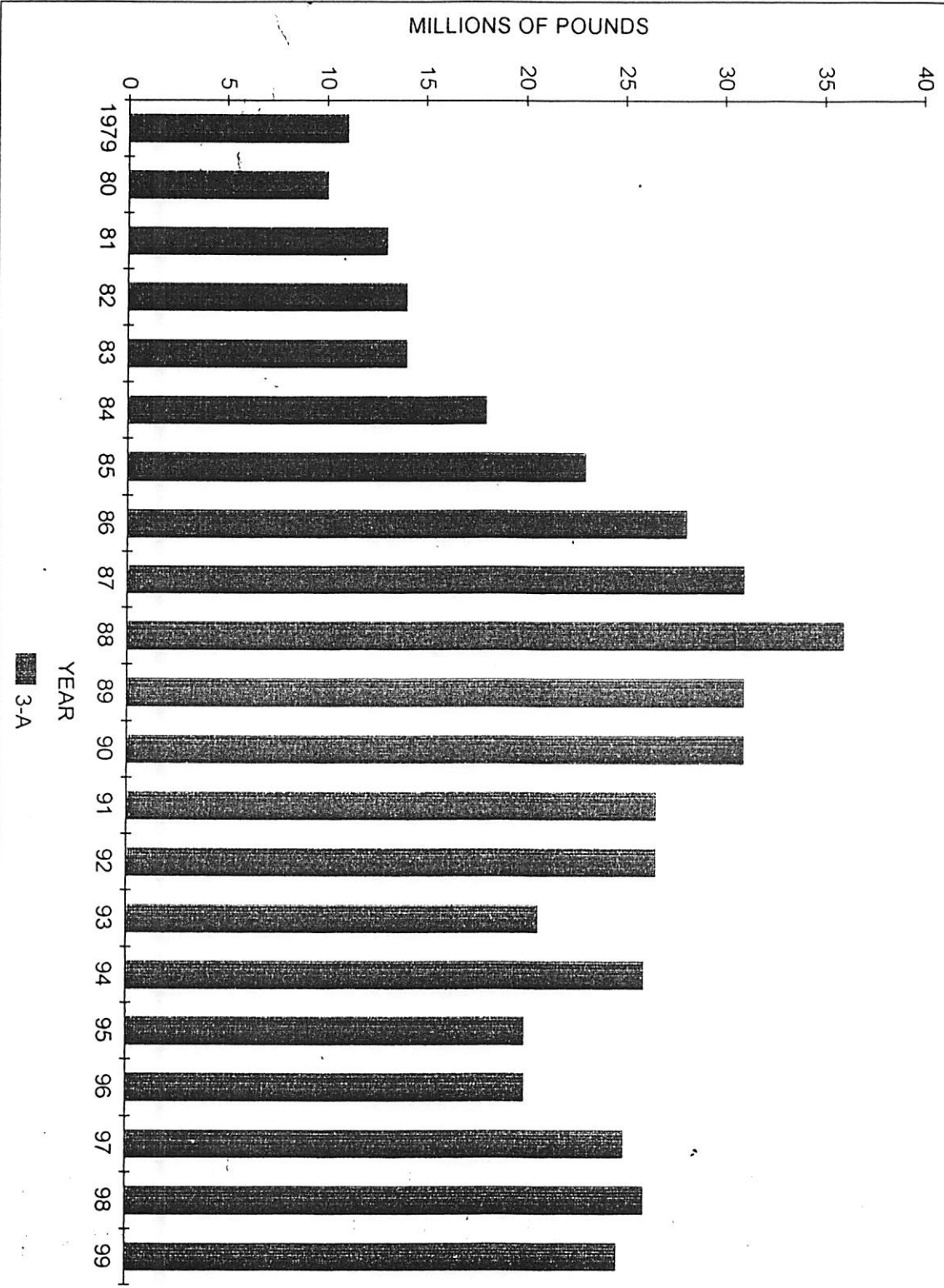
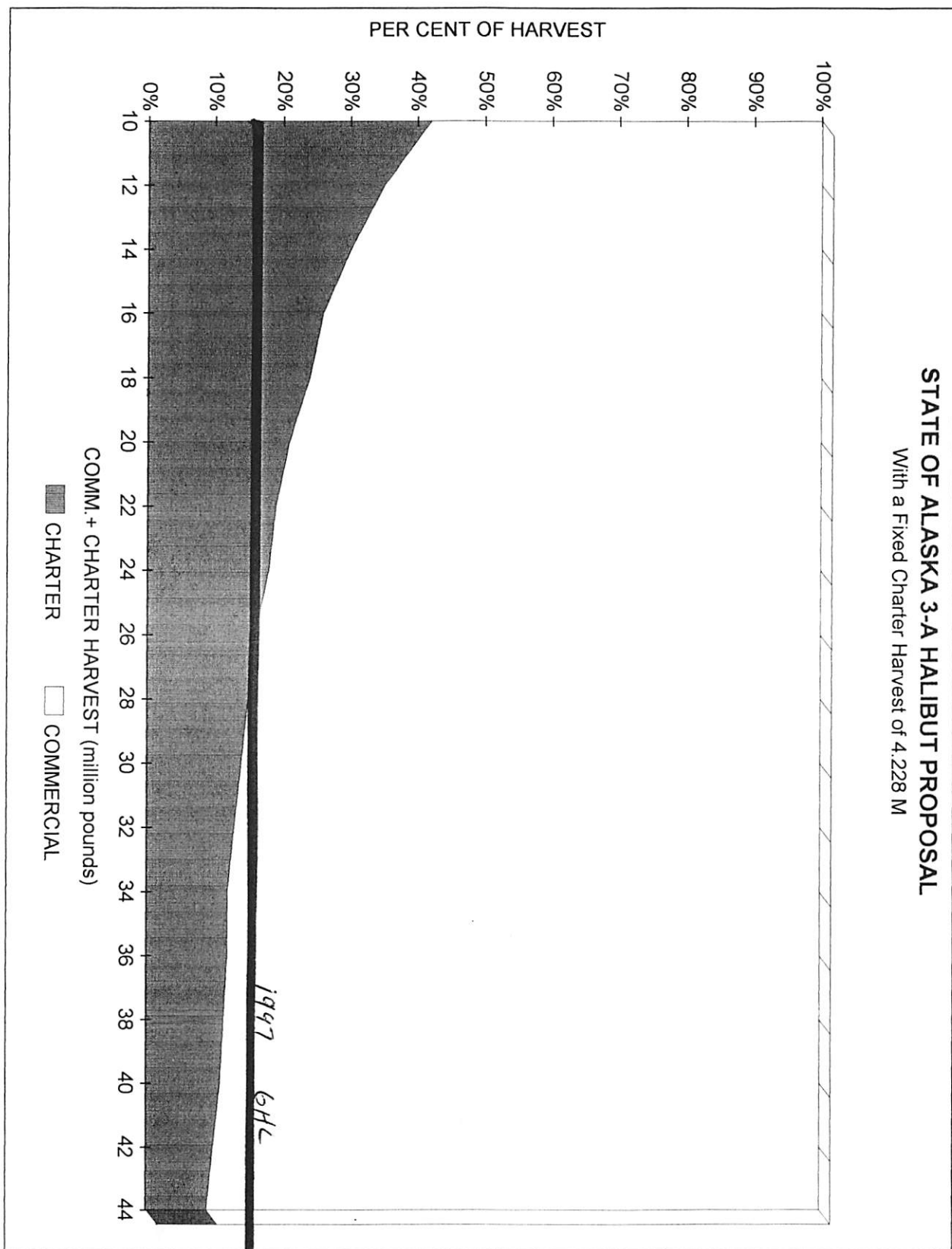


FIGURE 14

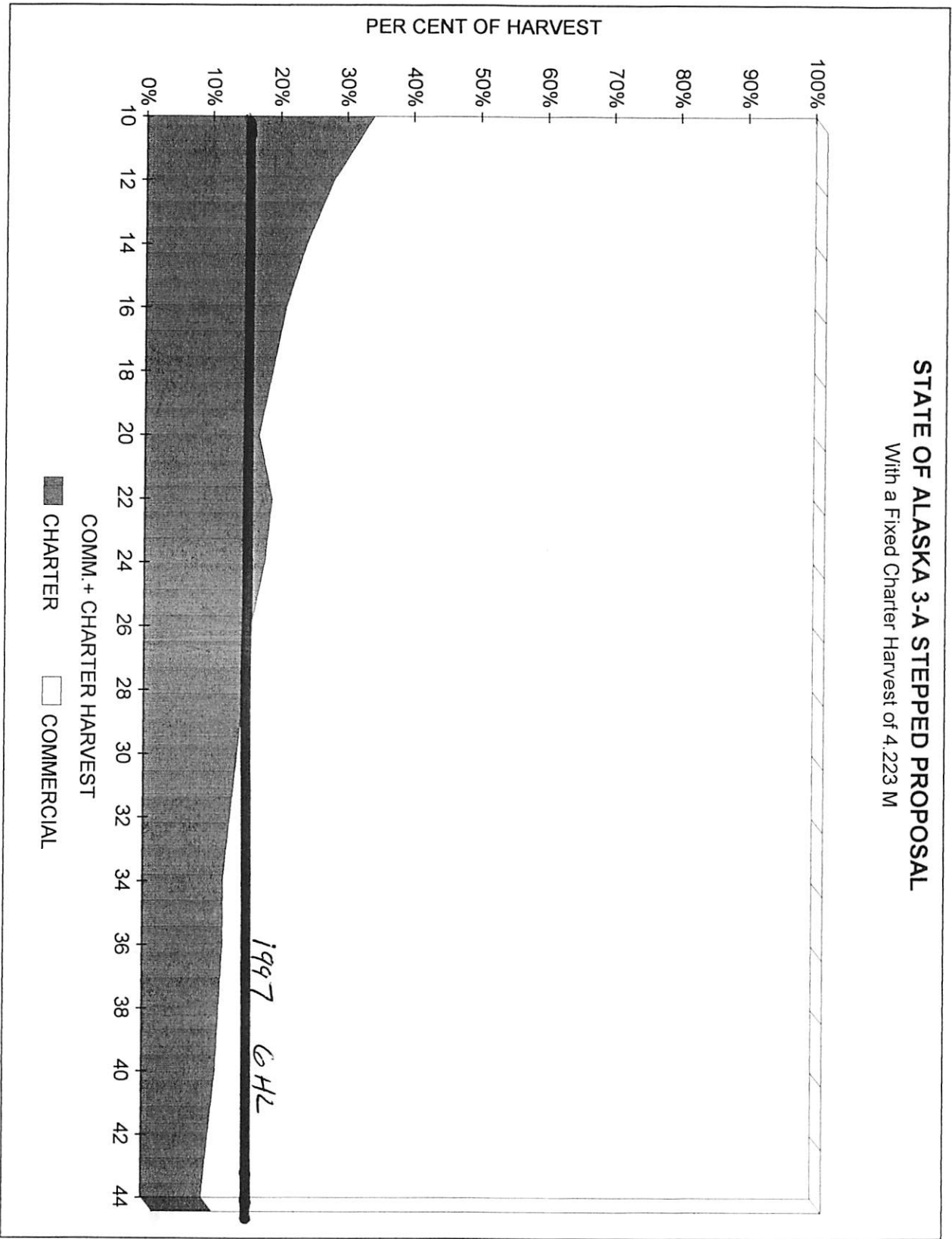


(14)

1997  
GHL

FIGURE 15

STATE OF ALASKA 3-A STEPPED PROPOSAL  
With a Fixed Charter Harvest of 4.223 M

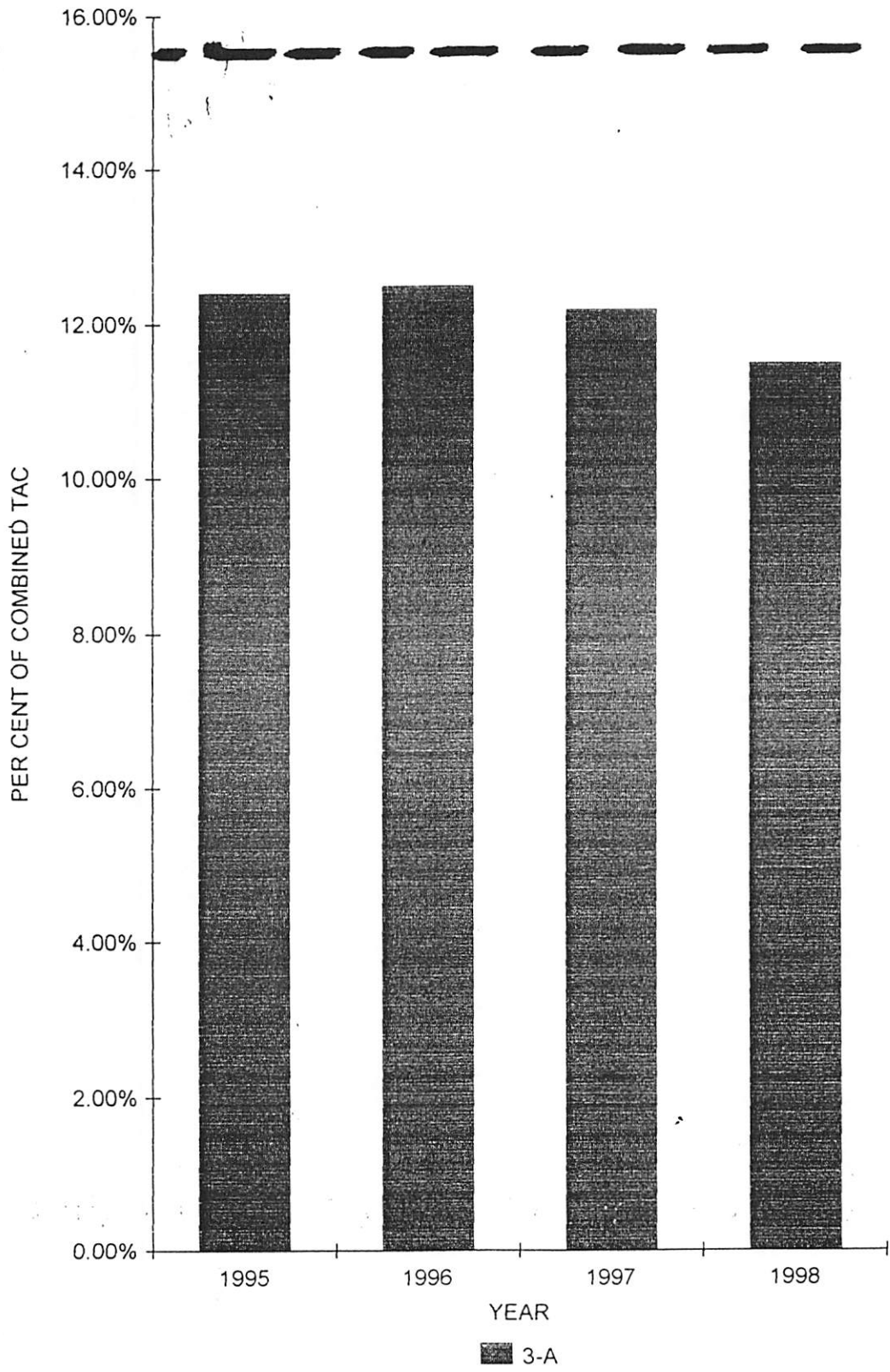


1997  
GH2

15

CHARTER % OF COMBINED TAC IN 3-A

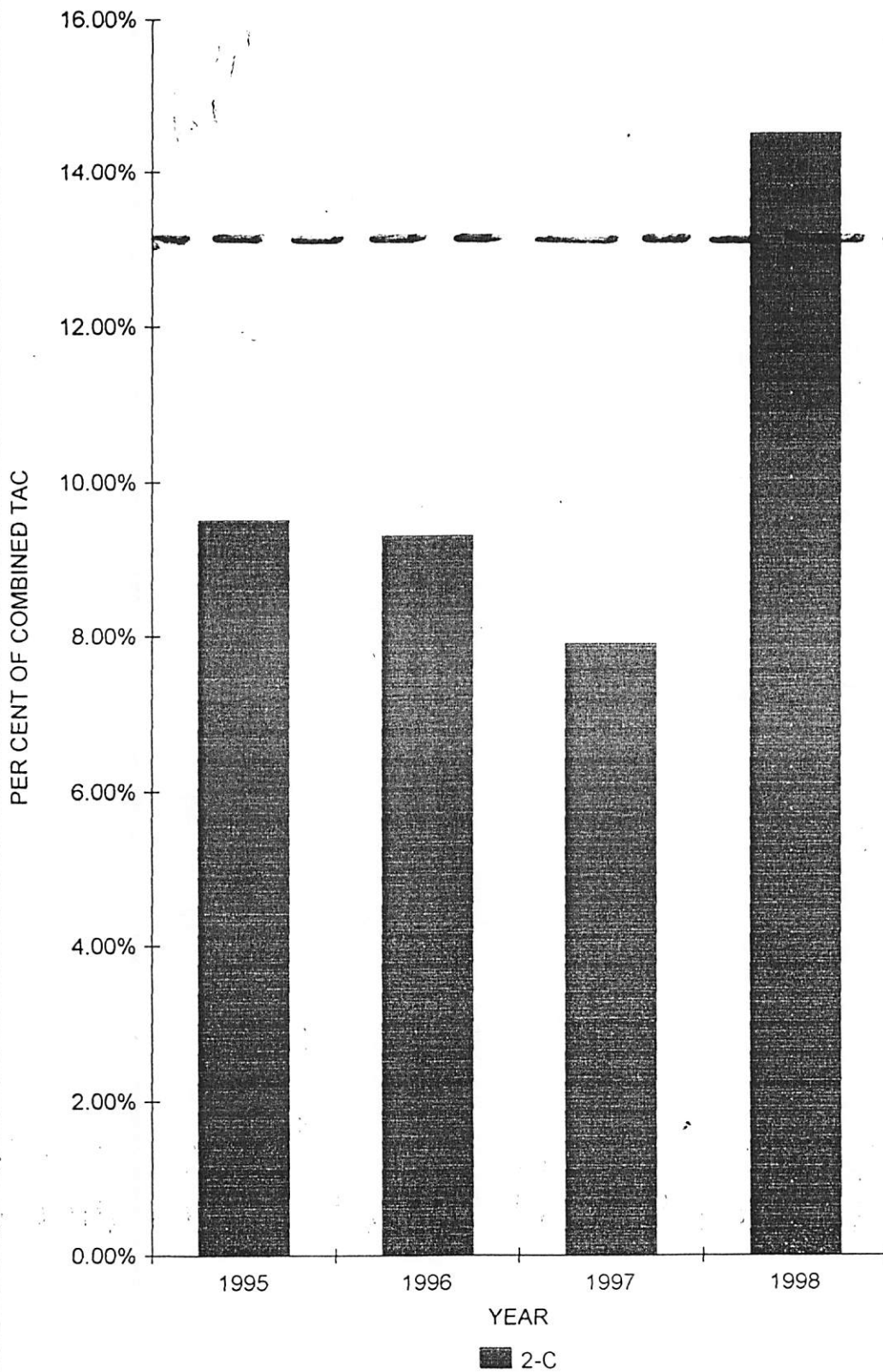
Combined Tac = Comm. + Charter



1997  
GHL

### CHARTER % OF COMBINED TAC IN 2-C

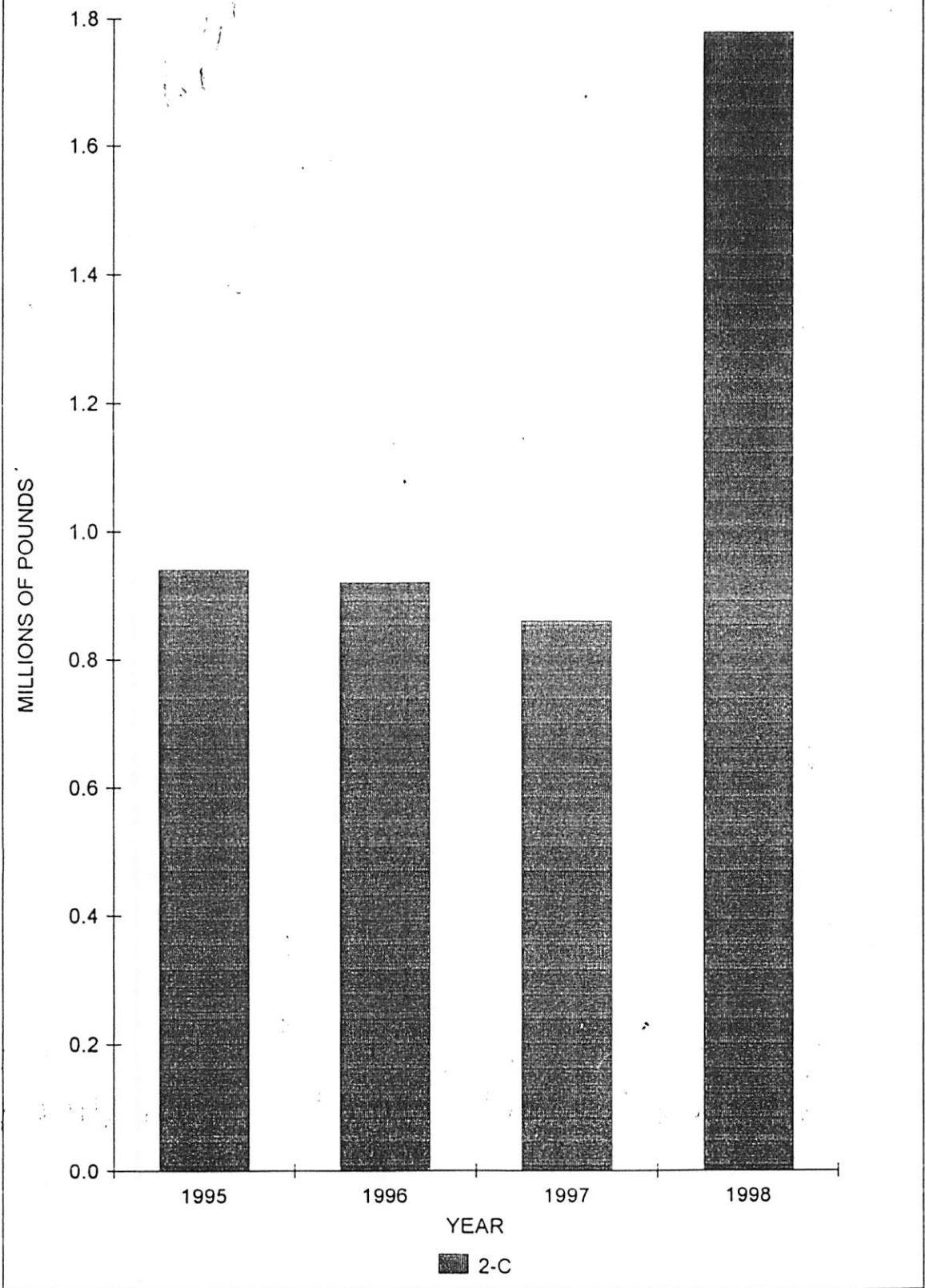
Combined TAC = Comm. Quota + Charter



1997  
GHL

# 2-C HALIBUT CHARTER HARVEST

Millions of Pounds



# AVERAGE SIZE HALIBUT IN CHARTER HARVEST

Individual Fish in IPHC Areas 2-C & 3-A

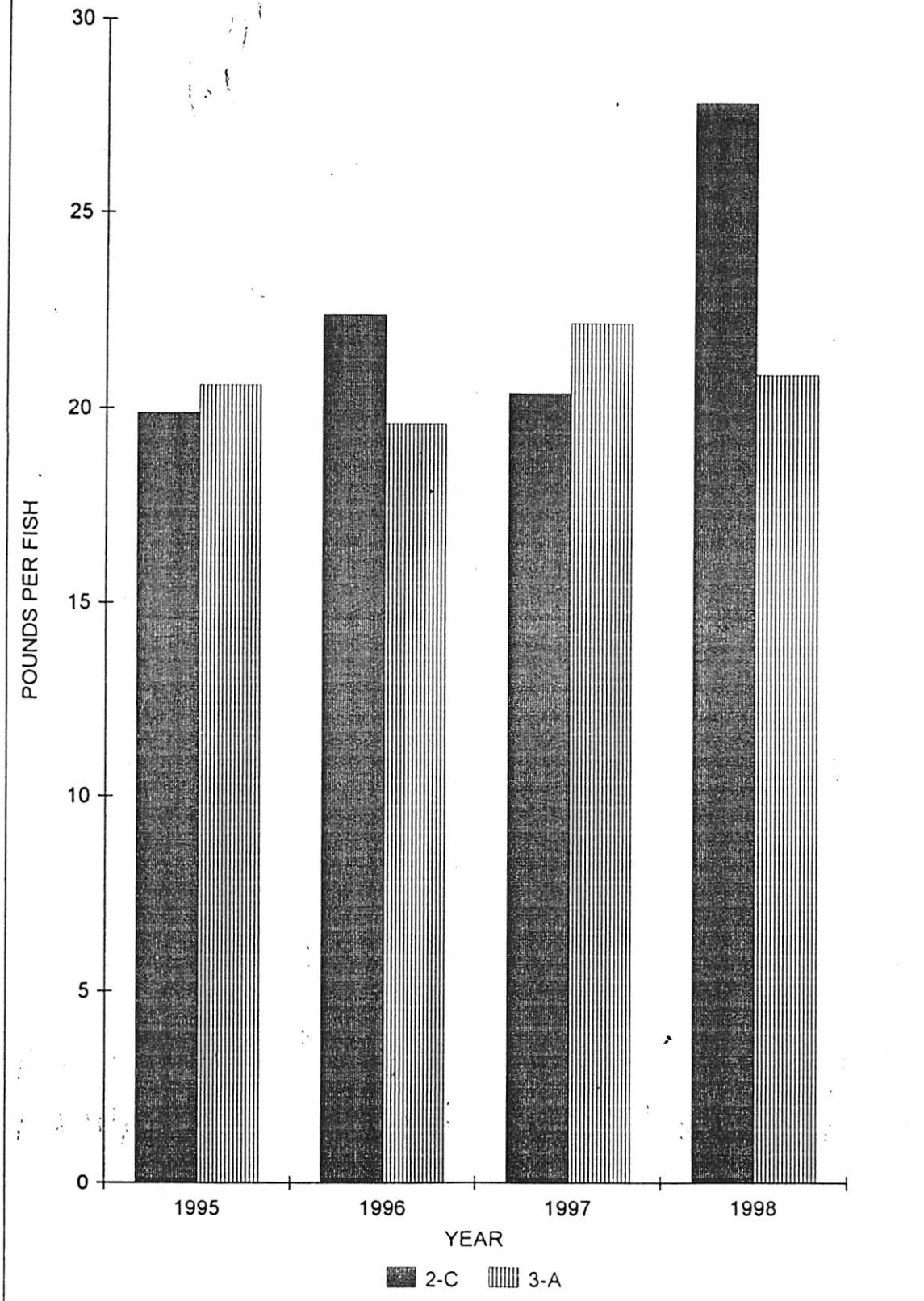
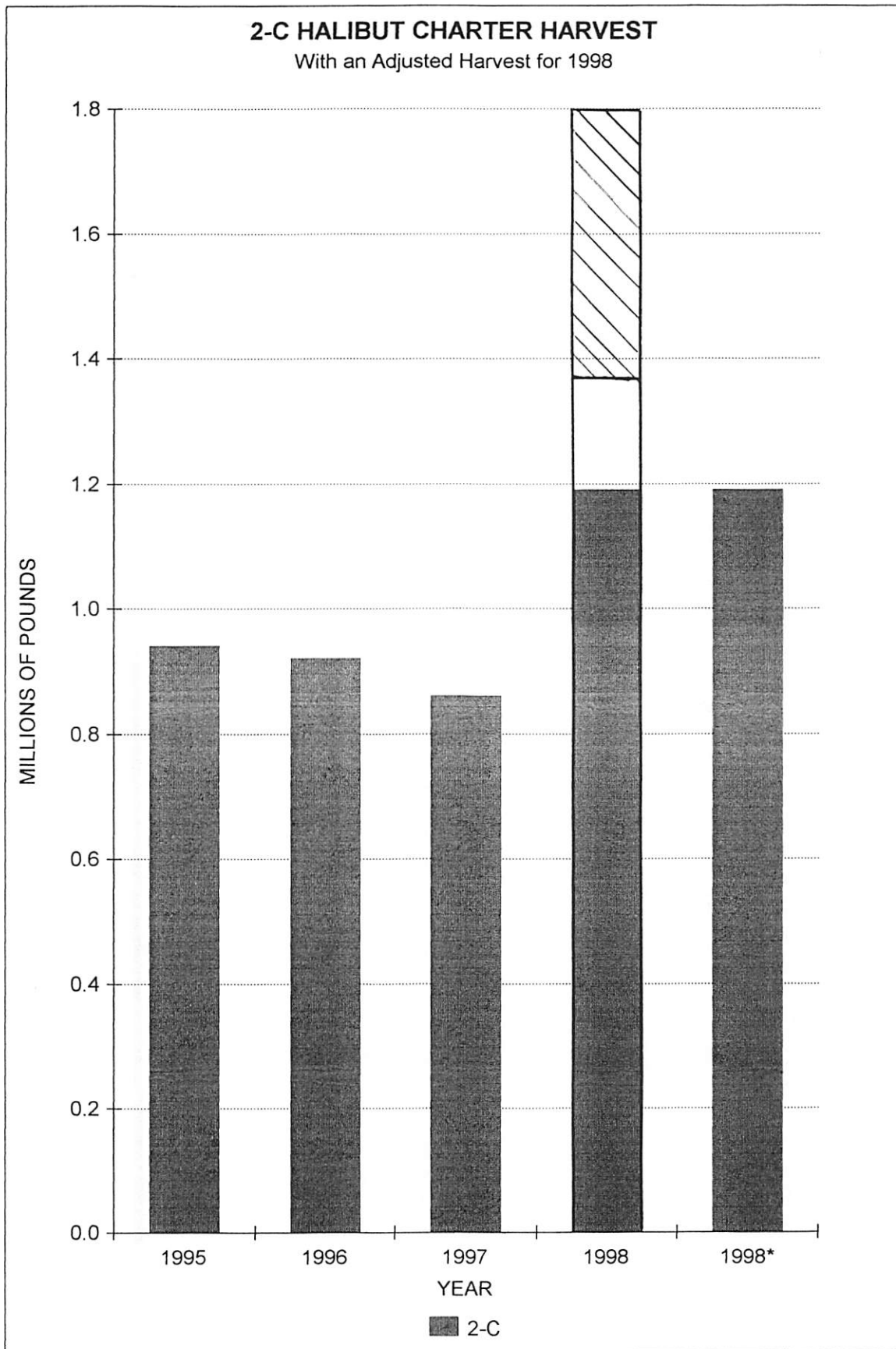

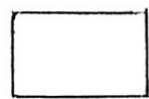




FIGURE 18

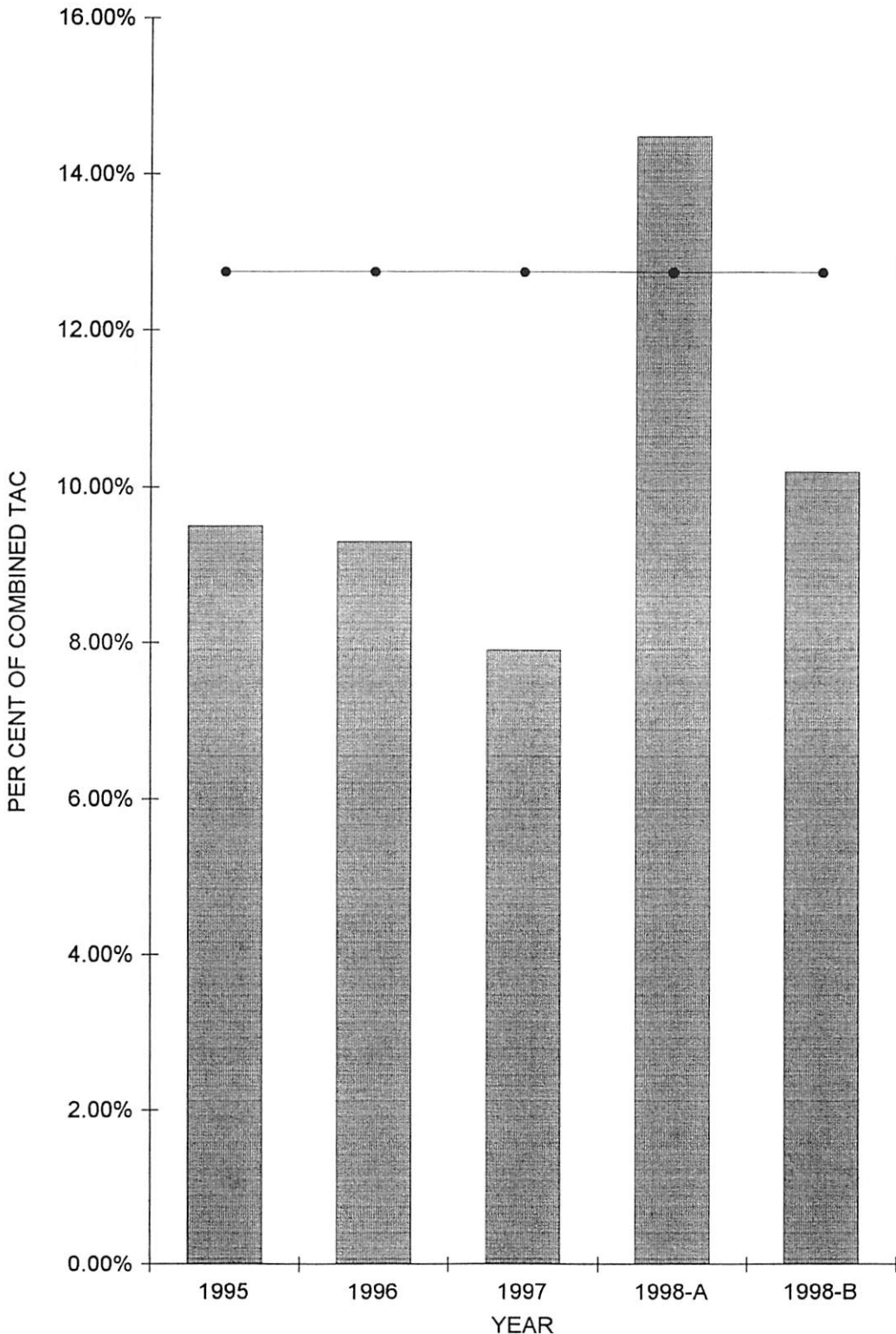


 = WEIGHT GAIN  
IN 1998

 = BLARNEY FACTOR  
(MINIMUM ESTIMATE)

### CHARTER % OF COMBINED TAC IN 2-C

Combined TAC = Comm. + Charter



← 1997  
GHL

1998-A = uses 1998 AVG. WEIGHT  
1998-B = uses 1995-97 AVG. WEIGHT

## Board of Fisheries Management Measures in the SEAK Chinook Management Plan

- no retention by charter captains and crew
- reduction in bag and possession limits on charter vessels
- size limits
- prohibition on the use of downriggers on charter vessels
- prohibition on the use of downriggers on all sport vessels
- reduction in bag and possession limits on all sport vessels
- reduction in bag and possession limits for all vessels during times and in areas where a salmon derby is occurring

## **1998 Charter Logbook & Harvest Data** **2-C (SEAK)**

- 1.8 million pounds (64,204 fish).
- 1,250 charter vessels licensed. 910 logbooks issued. 625 logbooks returned.
- 60% of all sport caught halibut in 2-C.
- 97% of the clients were non-residents.
- Average vessel caught 2,825 lbs. (Average IFQ holding in 2-C is 5,972 lbs.)
- Each client averaged one halibut per trip.
- One fish released for every two caught.

## **3-A (South Central)**

- 3.4 million pounds (158,890 fish).
- 1,320 charter vessels licensed. 655 logbooks issued. 518 logbooks returned.
- 57% of all sport caught halibut in 3-A.
- 67% of the clients were non-residents.
- Average vessel caught 6,637 lbs. (Average IFQ holding in 3-A = 10,883 lbs.)
- Each client averaged 1.66 halibut per trip.
- One fish released for every one caught.

**IPHC Report on Incidental  
Catch and Mortality of Pacific  
Halibut: 1962 - 1998**

**Bycatch Mortality**

“Most of the decrease [in bycatch] is attributed to the introduction of Individual Fishing Quota (IFQs) in the Alaskan sablefish fishery...”

“Much of the bycatch mortality in Area 2-C has been eliminated with the introduction of IFQs in 1995.”

C-3

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Representing: The Afognak Native Corporation, Koniag, Inc., Kodiak Native Tourism Association and the Gulf of Alaska Coastal Communities Coalition

**Testimony to the  
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
Regarding HALIBUT CHARTERBOAT MANAGEMENT**

**DECEMBER 11, 1999**

My name is Gale Vick. I am a 32 year resident of Alaska and salmon driftnetter in Prince William Sound. My primary business is working with rural Alaska communities on fisheries regulatory issues and tourism development.

I am speaking today on behalf of the six rural communities of Kodiak Island, Afognak Native Corporation, Koniag, Inc., the Kodiak Native Tourism Association and the Gulf of Alaska Coastal Communities Coalition. Our membership includes commercial fishermen, lodge owners, charter operators, subsistence users, and guided and non-guided sports users in IPHC areas 3A, 3B and 2C. We have many stakeholders with varying concerns in the halibut charterboat issue.

As we deliberate over the increasingly complicated options before us, we need to keep in mind that we want to successfully create an agreement between halibut resource users on how best to manage the relationship and conservation of use. The issue of managed growth within the halibut charterboat industry is not just a question of allocation conflicts between charter boat operators and commercial halibut fisherman; it is an issue of recognizing the completely different nature of the two industries with very different management needs AND an issue of recognizing the differences in charter operations from one region to another.

We are not going to be successful with the application of a formula that seeks to treat both industries and all areas alike. While the commercial side needs to deal in absolutes and standard applications, the charter side needs flexibility in the pursuit of the same goals - managed growth (up or down) and protection of the resource. While Kachemak Bay may need to utilize one mechanism for harvest management, Kodiak Island may need to apply a completely different management tool.

The development of Local Area Management Plans (LAMPs) is the only way local areas are going to be able to address application of conservation measures which serve each area best. Population stresses, tourism patterns, geographical differences, market saturation versus underdevelopment, gear conflicts, and most specifically, the condition of near-shore stocks, vary enormously from area to area. A GHM can drive the need for resolution, but it is the local areas themselves which must work out - from the various management options that this

group can suggest (but not limited to) - how best to affect the end result. LAMP groups can work from sub-LAMPs within their own boundary areas and can work with other LAMP groups on the issues of "shared waters" and definitely the impacts of a shared GHL.

For instance, it may seem like a simple task to apply an area-wide moratorium but this could, as page 142 of the GHL Analysis suggests, conflict with local area management tools, creating a much greater problem. Further, an area-wide application will not necessarily address the issue of near-shore depletion nor create dialogue among the multitude of users groups that impact local stocks nor even necessarily inhibit what is perceived to be uncontrolled growth. Area-wide application of a moratorium is a sure fire way to pit well-established, over-capitalized areas against under-developed areas looking for ways to create better economic opportunity while also managing growth and maintaining the health of their near-shore stocks. (For example, charter operators can educate both their crew and clients on low mortality catch and release methods and sparing large breeder fish.) I was particularly struck by the table on page 133 of the Analysis which clearly emphasizes how an area-wide moratorium would benefit one sector at the expense of many others. Under each of the four options available for moratoria criteria, outlying communities on Kodiak Island and other areas would be huge losers.

Data recorded through local area plans will give us a much better understanding of both use and growth patterns. Earlier this week, the SSC was concerned that the Analysis drew on data from a high impact area and cautioned that this data cannot be fairly extrapolated over an entire IPHC area nor between areas 3A and 2C. For the last year, we have heard that the shift in data gathering mechanisms both through the IFQ system and the ADF&G charter log book entries combined with creel census, has created a new "historical" comparison and that all of this data is too new for us to really get a handle on patterns.

We don't want to delay this process unnecessarily, so, even though we would like to see an analysis of Kodiak Island conditions appropriately compared to Kachemak Bay or Prince William Sound as a whole (not using the Kenai model) enough of that data may not exist right now. It may be sufficient to footnote the Analysis stating that "this model cannot be utilized for all of 3A," suggesting that local area management plans would be the appropriate place to define boundaries for dating collection<sup>1</sup>.

On page 141 of the GHL Analysis, staff wrote that "LAMPs have the 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 GHL 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 requires significant monitoring and enforcement costs, but LAMPs do have the advantage of heightened local attention, especially if the LAMP was developed through community consensus."

I would suggest that ANY management system we use will require "significant monitoring and enforcement costs" but it is infinitely better to have that ability at the local level. A shared GHL is going to force inter-LAMP cooperation within each IPHC area.

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<sup>1</sup> It might be useful to factor in the declining percentage rate of visitors to Alaska, as noted by the Alaska Visitor's Association in the Council testimony yesterday.

Several potential LAMP groups have been in the process of defining geography. Kodiak Island - Area K - is really a definitive management area. It makes a lot of sense both politically and geographically and we are all in agreement that this should be the boundary. We are getting closer to solutions reached by consensus with other LAMP groups. However, before we proceed any further, we need the Council to take final action on the GHL issue with the following considerations:

- NO area-wide moratorium
- Use of harvest management tools within LAMPs only
- Establishment of a GHL which is
  - flexible
  - abundance-based,
  - a guideline, NOT a cap or an allocation<sup>2</sup>
  - fair and implementable
- NO in-season closures
- Manage the GHL based on a 3-5 year weighted and regular rolling average<sup>3</sup>
- Creation of a line of authority which would facilitate implementation of management measures

In conclusion, we reiterate the following position. Some of this may be redundant to action already taken but I think it bears repeating. We therefore respectfully request:

- (1) That the North Pacific Fishery Management Council establish a FAIR guideline harvest level (GHL)<sup>4</sup> for halibut charterboat operators in IPHC Area 3A but defer geographical boundary decisions, moratorium issues and options regarding implementation of harvest restriction to the Alaska Board of Fish, in accordance with the protocols established between the Council and the Board of Fish for this very purpose.
- (2) That the North Pacific Fishery Management Council authorize the Alaska Board of Fish to manage Local Area Management Plans (LAMPs)<sup>5</sup> for the near-shore areas of 3A in order to protect near shores areas from temporal and spatial halibut depletion, and that these areas be commensurate, for reporting purposes, with existing Alaska Department of Fish and Game salmon management areas,<sup>6</sup> with sub-LAMP

<sup>2</sup> We strongly oppose any measure which would create an in-season shut-down capability. On page 3 of the October 20, 1999 NPFMC staff-prepared "Update on Analytical Design of the Halibut GHL/ Moratorium Analysis", it is noted that "A closure is the distinguishing feature of an allocation. For example, NMFS sets a groundfish allocation and closes that fishery when the allocation is reached. Without a closure, the fishery is managed within a guideline but is not shut down in-season."

<sup>3</sup> We fully support the AP's request for analysis on this

<sup>4</sup> We are not taking a position on GHL options at this time. We need time to go through the current analysis and see what position, if any, that we might take during Final Rule.

<sup>5</sup> Here again, in accordance with existing protocols.

<sup>6</sup> Area K is all waters south of a line extending east from Cape Douglas (58 51.10' N. lat) West of 150 W long, North of 55 30.00' N. lat., and east of a line extending south from the southern entrance of Imuya Bay near Kilokak rocks (156 20.22' W long.) The waters immediately north of Shuyak Island would be included but the waters immediately adjacent to the Barren Islands could be considered "common grounds."



areas. (For Kodiak Island this would be Area K. and the sub-lamps<sup>7</sup> would be Kodiak, Port Lions / Ouzinkie, Old Harbor, Akhiok, Larsen Bay and Karluk.

- (3) That all stakeholders are included in the development of local area halibut management plans.
- (5) That the Alaska Board of Fish and the North Pacific Fishery Management Council consider halibut charterboat moratoriums ONLY within the context of local area management plans.
- (6) That the North Pacific Fishery Management Council formally adopt a measure which would specify that any reduction measures necessary to maintain the guideline harvest level would not shut the charter industry down in-season but would be deferred for implementation in the following year.
- (7) That the North Pacific Fishery Management Council continue to work toward additional reductions in halibut bycatch from other fisheries.

We further pledge that we are committed to adopting measures that would encourage a healthy near-shore population of halibut stocks that would, in turn, provide for continued shared use and stable local economic development.

Thank you for your time and consideration.

cc: A.A. Ole Olsen, President, Afognak Native Corporation  
Dennis Metrokin, President, Koniag, Inc.  
Freddie Christiansen, Chairman, Gulf of Alaska Coastal Communities Coalition

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<sup>7</sup> Sub-lamps should be for the management of near-shore depletion, not super-exclusive registration.