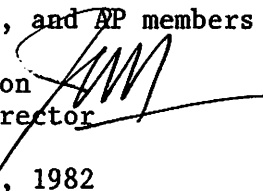


M E M O R A N D U M

TO: Council, SSC, and AP members  
FROM: Jim H. Branson   
Executive Director  
DATE: September 16, 1982  
SUBJECT: Update on Halibut Moratorium

*ACTION REQUIRED*

*Informational.*

BACKGROUND

The NOAA General Counsel in Juneau has drafted a proposed rule to impose a moratorium on entry of certain fishermen into the halibut fishery off Alaska [see Agenda C-5(a)]. Thorn Smith will be available to answer questions concerning the moratorium.

Agenda item C-5(b) is a report on the Nelson Island halibut fishery.

[Billing Code

]

**DRAFT**

DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

50 CFR Part \_\_\_\_\_

Pacific Halibut

AGENCY: National Oceanic and Atmospheric Administration (NOAA)  
Commerce.

ACTION: Proposed rule.

SUMMARY: NOAA proposes a rule imposing a moratorium on the entry of certain fishermen into the halibut fishery in waters under United States jurisdiction in the northern Pacific Ocean (International Pacific Halibut Commission management areas 2C and 3), and that part of the Bering Sea and Aleutians (management area 4) south of 56 degrees north latitude. The proposed rule would forbid any person to harvest and sell halibut from those waters after January 1, 1983, who had not at any time since January 1, 1978 lawfully harvested and sold halibut from those waters. A person would be considered to have lawfully harvested halibut there if that person had served as master or crew aboard a vessel in those waters at a time when that vessel harvested halibut that was later sold. A person would be considered to have sold that halibut if the sale was reported to the extent required by law, and such sale recorded in the name of that person on the document of sale required by law. This action is necessary to discourage a further increase in the number of participants

# DRAFT

in the northern Pacific halibut fishery. This fishery is already so crowded as to provide only a small income to most current participants and to require extremely short seasons which are detrimental to fishermen, to consumers, and probably to the halibut resource itself. This action is expected to discourage a rush of new participants from entering the fishery in 1983 in hopes of obtaining rights under a proposed permanent limited entry system for this fishery.

**DATES:** Comments on the proposed rule must be received on or before \_\_\_\_\_, 1982. The proposed moratorium would go into effect on January 1, 1983 and expire on December 31, 1985.

**ADDRESS:** Comments on the proposed rule should be sent to Robert W. McVey, Director, Alaska Region, National Marine Fisheries Service, P.O. Box 1668, Juneau, Alaska 99802.

**FOR FURTHER INFORMATION CONTACT:** Robert W. McVey, telephone 907-586-7221.

## SUPPLEMENTARY INFORMATION:

### Background

In recent years, the fishery for Pacific halibut (Hippoglossus stenolepis) off the coasts of Alaska and the Pacific Northwest has witnessed a large increase in the number of participating fishermen despite the fact that halibut stocks during this time

# DRAFT

have been at depressed levels of abundance. This has required that halibut fishing seasons in these areas be restricted to periods of as little as one week per year. The resulting combination of many participants, a depressed resource, and short seasons has had a number of undesirable effects:

(1) Fresh halibut, which is greatly superior to the frozen product, is available to consumers only during the few weeks of commercial halibut seasons.

(2) The concentration of halibut fishing effort in very short periods of time each year may result in overharvesting of stocks that happen to be on the fishing grounds during those periods, while leaving underutilized other stocks that are on the grounds at other times of the year.

(3) For the great majority of participants, the halibut fishery no longer generates sufficient income to earn a significant part of their livings. For some participants, this has had the effect of encouraging their diversification into other fisheries. Other participants, however, now must pursue the halibut fishery practically on a hobby basis, earning most of their income from unrelated sources. This is particularly true now that financing for expansion into new fisheries is more difficult to obtain than it was in the past.

# DRAFT

In order to address these problems, the North Pacific Fishery Management Council is investigating the establishment of a limited entry system for the northern Pacific halibut fishery. Major goals of this system would be the extension of the halibut fishery over a longer period of the year, and the encouragement of voluntary arrangements among current participants under which the fishery would be prosecuted by some subset of them on a fully professional basis, perhaps through the trading of alienable authorized harvest shares. The establishment of such a system is authorized by §5(c) of the Northern Pacific Halibut Act of 1982, Pub. L. 97-176, 96 Stat. 78, 79 (Act).

It is feared that the prospect of a limited entry system will cause substantial numbers of people with no previous participation or stake in the fishery to consider entering the fishery for the first time in 1983, solely in the hope of gaining a financially valuable right in the fishery under the limited entry system. A sudden influx of new participants in 1983 would have at least two undesirable effects:

(1) It would in the short term put further pressure on halibut resources and further reduce the harvest shares of individual participants during the 1983 season.

(2) It would in the long term frustrate the current proposal that the limited entry system include all or a high pro-

# DRAFT

portion of current participants, with the reduction of participation left primarily to the voluntary transfer of authorized harvest shares. It would tend to make necessary a much more burdensome system under which many more current participants could be involuntarily excluded from the fishery, at great cost to those participants. A sudden expansion of the fishery in 1983 could also result in harvest shares under the proposed system that would be too small and too numerous to be easily managed and traded.

In order to prevent these inequitable results, the North Pacific Fishery Management Council, under the authority of §5(c) of the Act, has developed a proposed rule that would impose a moratorium on entry into the northern Pacific halibut fishery as of January 1, 1983. Under this moratorium, no person could harvest and sell halibut from waters under the jurisdiction of the United States in International Pacific Halibut Commission (IPHC) management areas 2C and 3, and in that part of IPHC management area 4 south of 56 degrees north latitude, unless that person had at any time since January 1, 1978 lawfully harvested halibut from those waters and sold that halibut, reporting the sale in his name as required by State or Federal law. A person would be considered to have lawfully harvested halibut from those waters if that person had served as master or crew aboard a vessel at a time when that vessel harvested halibut. If the halibut so harvested was sold, any person considered to have harvested that halibut will be

# DRAFT

considered to have sold it if the sale of the halibut was reported to the extent required by State and Federal law, and such sale lawfully recorded on the document of sale required by law in the name of that person. The moratorium would not apply to the part of area 4 north of 56 degrees north latitude in order to implement a provision of §5(c) of the ~~Act authorizing~~ the Council

to provide for the rural coastal villages of Alaska the opportunity to establish a commercial halibut fishery in areas in the Bering Sea to the north of 56 degrees north latitude during a 3 year development period.

The moratorium would expire at midnight on December 31, 1985. By that time it is expected either that the Council will have developed the permanent limited entry system and that system will have been implemented; or that the Council will have determined that a permanent limited entry system should not be developed.

The fact that a person has obtained a Federal, State, or International Pacific Halibut Commission license or permit to fish for or to sell halibut would not affect the application of the moratorium to that person. Unless a person met the criteria for participation in the fishery established by the proposed rule, that person would be forbidden to harvest halibut in the area specified and to sell that halibut, even if he had obtained all necessary permits. Agencies issuing permits to fish for and to

# DRAFT

sell halibut will make no inquiry about the eligibility of permit applicants to participate in the fishery under this proposed rule, although they will take steps to warn such applicants of the moratorium's effect.

~~It should be noted that the Council has not yet determined~~  
whether a limited entry system should ultimately be adopted, or what form any such system might take. In view of the Council's desire to avoid imposing unnecessary interim constraints on the fishery, the proposed moratorium allows every current participant in the fishery, whether master, crew member, or owner of vessels or gear, to continue to participate in that capacity. New masters or crew members may be employed in the fishery, and investment in vessels and gear may continue. Only the harvest and sale of halibut by those who have not harvested and sold halibut at any time during the specified period is prohibited. However, all persons are warned that while the Council has not yet selected criteria upon which to base participation in any limited entry system which might be adopted, such a system is under consideration and additional investment and participation in the halibut fishery in the area specified are undertaken at risk.

## Classification

The NOAA Administrator has determined that this proposed rule is not a "major rule" requiring a regulatory impact analysis under Executive Order 12291, because it will not result (1) in



# DRAFT

an annual effect on the economy of \$100 million or more; (2) in a major increase in costs or prices to consumers, individual industries, Federal, State, or local government agencies, or geographic regions; or (3) in significant adverse effects on competition, employment, investment, productivity, innovation, or on the ability of United States-based enterprises to compete with foreign-based enterprises in domestic or export markets. By discouraging potentially unprofitable investment in and entry into the halibut fishery, and by reducing the number of persons whose participation will have to be considered in the implementation of any limited entry system, this proposed rule can be expected to yield a net benefit to society.

The Assistant Administrator for Fisheries, NOAA, has determined that this rule will not have a significant economic impact on a substantial number of small entities, and thus does not require the preparation of a regulatory flexibility analysis under 5 U.S.C. 603 and 604. The moratorium is specifically designed to avoid the imposition of unnecessary constraints upon the fishery. All current participants in the fishery may continue to participate as they have at any time since January 1, 1978. New masters and crew members may be employed as necessary, and investment in gear may continue. The only restriction is upon those who wish to both harvest and sell halibut from the area specified, and who have not done so since January 1, 1978.

# DRAFT

This proposed rule does not contain an information collection requirement or involve any agency in the collection of information for purposes of the Paperwork Reduction Act of 1980.

An environmental assessment on this proposed rule was filed with the Environmental Protection Agency on ~~\_\_\_\_\_~~. Based upon this assessment, the Assistant Administrator for Fisheries, NOAA, has determined that this proposed rule is not a major Federal action significantly affecting the quality of the human environment and requiring an environmental impact statement under §102(2)(C) of the National Environmental Policy Act.

The Assistant Administrator for Fisheries, NOAA, has determined that this proposed rule will be carried out in a manner that is consistent to the maximum extent practicable with the Alaska Coastal Management Program, in accordance with §307 of the Coastal Zone Management Act of 1972 and its implementing regulations.

List of Subjects in 50 CFR Part \_\_\_\_\_  
Fish, Fishing.

Dated:

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Robert K. Crowell  
Deputy Executive Director  
National Marine Fisheries Service

**DRAFT**

For the reasons set out in the preamble, Part \_\_\_\_\_ is proposed to be added to 50 CFR Chapter VI, to read as follows:

# DRAFT

PART \_\_\_\_\_ - PACIFIC HALIBUT FISHERY

Sec.

\_\_\_\_.1 Moratorium on entry into the Pacific halibut fishery.

AUTHORITY: §5(c), Pub. L. 97-176, 96 Stat. 78,79, 16 U.S.C.  
§773c(c).

§\_\_ .1 Moratorium on entry into the Pacific halibut fishery.

(a)(1) From 12:01 a.m., Alaska Standard Time, on January 1, 1983, until 11:59 p.m., Alaska Standard Time, on December 31, 1985, no person may harvest or sell halibut from the northern Pacific Ocean or that part of the Bering Sea south of 56 degrees north latitude who has not at any time since January 1, 1978 lawfully harvested and sold halibut from those waters and reported such sale to the extent required by law.

(2) For purposes of this section, a person shall be considered to have harvested halibut from the waters referred to in paragraph (a)(1) of this section if that person has served as master or crew aboard a vessel at a time when that vessel harvested halibut from those waters.

If the halibut so harvested was sold, any person who is considered to have harvested that halibut under this paragraph shall be considered to have sold that halibut for purposes of this section if sale of that halibut was reported to the extent

# DRAFT

required by law, and such sale lawfully recorded in the name of that person on the document of sale required by law.

(b) For purposes of this section,

(1) "halibut" means Hippoglossus stenolepis;

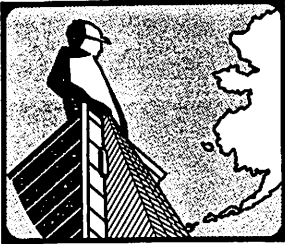
(2) "waters under the jurisdiction of the United States" means the internal waters and territorial sea of the United States and the fishery conservation zone established by the Magnuson Fishery Conservation and Management Act;

(3) "northern Pacific Ocean" means management areas 2C and 3 of the International Pacific Halibut Commission as those areas existed on January 1, 1982;

(4) "Bering Sea and Aleutians" means management area 4 of the International Pacific Halibut Commission as that area existed on January 1, 1982.

(c) The requirements of this section are in addition to all other requirements imposed by law for participation in the fishery for halibut. The issuance to a person of a Federal, State, or International Pacific Halibut Commission license or permit purporting to authorize fishing for or sale of halibut during 1983 or any subsequent year shall neither excuse nor constitute evidence of that person's compliance with paragraph (a) of this section.

AGENDA C-5(b)  
APPENDIX  
September 1982



# Bering Sea Fishermen's Association

805 West 3rd Avenue  
Anchorage, Alaska 99501  
(907) 279-6519

ACTION	DATE	INITIAL
Exec. Dir.		3
Deputy Dir.		4
Admin. Off.		
Ext. Spec.		
Stat. A.		
Stat. B.		
Stat. C.		
Stat. D.		
Stat. E.		
Stat. F.		
Stat. G.		
Stat. H.		
Stat. I.		
Stat. J.		
Stat. K.		
Stat. L.		
Stat. M.		
Stat. N.		
Stat. O.		
Stat. P.		
Stat. Q.		
Stat. R.		
Stat. S.		
Stat. T.		
Stat. U.		
Stat. V.		
Stat. W.		
Stat. X.		
Stat. Y.		
Stat. Z.		

August 25, 1982

Jim Branson, Executive Director  
North Pacific Fishery Management Council  
333 W. 4th Ave. Suite 32  
Anchorage, Ak. 99501

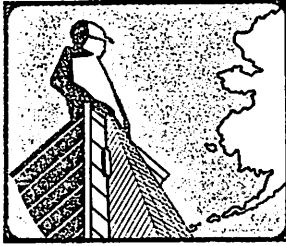
Dear Mr. Branson:

Enclosed is a report on the activities of the Nelson Island Halibut Fishery. Please include it in your information packet for the September Council meeting. Thank you.

Sincerely,

*Paula Cullenberg*  
Paula Cullenberg,  
Extension Specialist

enclosure



# Bering Sea Fishermen's Association

805 West 3rd Avenue  
Anchorage, Alaska 99501  
(907) 279-6519

## FINAL REPORT OF THE FIRST YEAR OF THE NELSON ISLAND HALIBUT FISHERY

Prepared by Paula Cullenberg, Extension Specialist, Bering Sea Fishermen's Association.- August, 1982.

### INTRODUCTION

Halibut fishing is the only commercial fishery accessible to the existing small boat fleet of Tununak, Toksook Bay, Nightmute, Newtok and Mekoryuk, as these villages are not situated on any salmon spawning watercourse system and the Etolin Straits area is closed to the commercial take of herring. In 1981, Federal CETA through the Association of Village Council Presidents, contracted with an experienced halibut fisherman returning from field instruction on the Pribilofs to show village fishermen how to prepare and set commercial halibut longlines.

A description of the prospective fishery was presented at the International Pacific Halibut Commission meeting in Seattle in February by staff of the Bering Sea Fishermen's Association and Mark John of Toksook Bay. As a result, commercial openings in the Bering Sea were established in May, June and July. Support for the developing fishery was expressed by halibut fishermen through the inclusion of the coastal villages in their proposal to the North Pacific Fishery Management Council to limit entry in the fishery.

Funds became available to Nunam Kitlutsisti in spring of 1982 through the Bethel CETA office to contract with Bering Sea Fishermen's Association to provide technical assistance in the areas of fishing technique, handling, record keeping and marketing. Workshops carried out by Paula Cullenberg

of BSFA and Rick Steiner of the Marine Advisory Program, University of Alaska, were held in four villages three times preceeding the opening of the commercial season.

The commercial opening in the Bering Sea in May was unavailable to the Nelson Island fishermen since the Etolin Straits were still frozen. The next commercial opening began on June 9 and lasted until June 28. Fishing was not opened in July since heavy fishing, primarily in the Aleutian and Alaskan Peninsula area obtained the 1.5 million pound quota for the Bering Sea during the June season.

At the completion of the season, 8147 pounds of halibut had been landed by 32 fishermen from Tununak, Toksook Bay and Newtok. Final price paid to the fishermen averaged \$1.03/ lb.. The fishery was essentially economically self sufficient. Fishermen were pleased with the results and are looking forward to expanding the fishery in 1983.



DESCRIPTION OF OPERATION

TRAINING

In the fall of 1981, Al Hoviland carried out a gear workshop in the villages of Nightmute, Tununak and Mekoryuk, funded through AVCP in Bethel. Hoviland, a commercial halibut fisherman, covered rigging, setting and baiting of longlines. Some on-water training was held.

Following up this training in the spring of 1982, a series of workshops in the villages were carried out by Paula Cullenberg, Extension Specialist at Bering Sea Fishermen's Association and Rick Steiner of the University of Alaska's Marine Advisory Program. Since this was the first commercial fisheries venture on Nelson or Nunivak Island, training covered all aspects of a commercial operation from harvest to consumer.

Workshops began in April when fishermen's meetings were held in Nightmute, Toksook Bay, Tununak and Mekoryuk, to assess interest and begin preparation for the June season. Commercial fishing licenses and vessel licenses were distributed and explained. Possible operational setups for landing, weighing, and shipping the fish were discussed. Over twenty fishermen attended the workshops in Nightmute, Tununak and Toksook Bay ( fishermen from Newtok attended the Tununak workshop). Interest was low in Mekoryuk, however, with only 6 fishermen attending the workshop.

CETA funding was used to provide thirty additional half-skates of halibut gear to fishermen in Nightmute, Toksook, Tununak and Newtok. It was felt that no gear should be brought out to Mekoryuk since interest in developing the fishery was low. The second set of workshops, held in May, were located in Toksook Bay with Nightmute residents attending, and Tununak with Newtok fishermen attending that meeting. The main purpose of the workshops was to distribute and rig the longline gear. Fishing techniques, cleaning and handling fish on the boat, weighing and storing the halibut and potential markets were also discussed. A half time manager was hired under CETA funds

in both Tununak (Jimmy Oscar) and Toksook Bay (Peter Julius) to be involved in weighing, chilling, packing the fish as well as completing fish tickets and paying the fishermen. Training for the managers was included in the May workshops although they did not begin working until June 1.

Final pre-season training took place in early June when weighing and storing facilities were set up and final gear rigging was completed. During the actual fishing season, on-water and on-shore training took place. Points covered included: baiting and setting longlines, cleaning and storing fish on board to preserve quality, weighing halibut, completing fish tickets, chilling fish, packing and shipping and final marketing of the halibut. At the end of the season, the two managers came into Bethel to complete final records and calculate final dividends to pay out to fishermen after all bills were paid.

DESCRIPTION OF OPERATION

## FISHING &amp; PROCESSING

About 16, 18-22' wood or aluminum open skiffs were used in the fishery with horse powers ranging from 35-70 hp. Gear used included the half skates of longline gear - each 900' long with 50 hooks as well as traditional jigging gear. Many skiffs fished both the longlines and jigged simultaneously, catching fish by pole and line while the longlines were soaking. Bait used included: herring, capelin and greenlings.

Weather is an important factor in fishing due to the size of the skiffs. During the 1982 June opening, about 5 days were too rough for any fishing to occur. With the many hours of light during June, fishermen made at least two tide or 12-hour fishing trips although some lasted up to 24 hours. All the fishermen worked in the same general area, up to 12 miles off of Cape Vancouver at depths ranging from 30 to 60'.

In general, jigging for halibut was more successful than longlining. This is partly due to a high starfish population eating the halibut bait on bottom. Fishermen were more experienced at jigging and landed halibut more consistently with this method. Fresh bait was used as fishermen continued to catch bait throughout the June opening.

Catch size ranged from 2-5 fish/trip averaging 16.3 pounds. In total, 499 fish at 8147 pounds were caught in the June opening; 6223 lbs in Tununak and 1724 lbs in Toksook Bay. Landings in Toksook Bay were lower due to the building of a sea wall in the village which employed many of the men at a steady income.

The halibut were dressed at sea, laid on the bottom of the boat white side up, and covered with a wet cloth. Individual fishermen brought in a few buckets of snow from nearby cliffs to the storage area and packed their own fish in large fiberglass fish totes. Approximately every other day,

stored fish were headed, washed and packed dry in 100 lb wetlock boxes and flown out on the Seair or Wien mailplanes that come into the villages every day.

#### MARKETING

Markets for fresh halibut were prearranged by staff at BSFA before the beginning of the fishing season. Arrangements were made to ship the halibut to a broker in Fairbanks who would pay \$1.65/lb. FOB Fairbanks.

However, as halibut began to move through Bethel, interest by Bethel residents grew and direct consumer sales began of 100 lb lots at \$1.75/lb. This required the completion of a Catcher-Seller form filed with the Division of Commercial Fisheries for the Alaska Department of Fish & Game. Fishermen were also required to complete a Waiver of Bonding Requirement with the State of Alaska Department of Labor to allow the fishermen to head their fish before shipping them.

By the end of the June opening, over half of the halibut landed in Nelson Island was sold by direct consumer sales to Bethel residents. This was by far the preferred market outlet since the only air freight necessary was from the villages directly to Bethel. It is hoped that next year's market in Bethel will be expanded to buy an even larger % of the catch.

Due to the quick turnover of funds by selling the fish directly in Bethel, a base price of \$.80/lb was paid to the fishermen by the manager during the June opening. Following the fishing season, the books were balanced, air freight and wetlock box bills were paid. Remaining profits were returned to the fishermen in the form of a \$.23/lb dividend resulting in a final price paid to the fishermen of \$1.03/lb. This price was very good considering the

distance of these fish to market. Most halibut fishermen in Alaska received \$.90/lb for fish within Nelson Island's average size class.

OPERATIONAL COST SUMMARY - 1982 Nelson Island Halibut Fishery

EXPENSES (to fishermen)

Managers - Peter Julius, Toksook Bay Jimmy Oscar, Tununak, hired ½ time for one month with ½ time assistant in Tununak.....	\$2500.00 **
Wetlock Boxes .....	1346.50
Wetlock Box Liners .....	139.20
Freight (boxes, liners and fish) .....	<del>2332.75</del>
Miscellaneous (truck rental, plastic bags, tape) .....	265.00
	<u>4083.43</u>

INCOME

Bethel Markets .....	\$7829.93
Fairbanks Markets .....	3899.63
Anchorage Markets .....	656.25
Tununak Markets .....	88.50
	<u>12,474.31</u>

Income - Expenses = Profits

\$12,474.31 - \$4083.43 = \$8390.88

\$8390.88 divided by 8147 lbs. = \$1.03/ lb paid out to fishermen.

\*\* Funded through CETA

## EVALUATION & RECOMMENDATIONS

### TRAINING

Continued training in all areas of the halibut fishing operations is necessary for the expansion of the fishery.

The longlines were not effective in 1982, probably due to a number of factors including bait, setting techniques, hooksize, location, length of set etc. Consultation with experienced longline fishermen may improve the fishing of the longlines, which would greatly increase the catch per unit effort.

Further training of managers in bookkeeping and marketing is essential if the fishery is to be sustained. A few residents of the village must become responsible, with some technical assistance, for developing and meeting the demands of the highest paying markets. Record keeping and reporting must be covered to ensure financial transactions.

The halibut fishery is on the verge of becoming a limited entry fishery. As such, regulations pertaining to halibut fishing are produced by both the International Pacific Halibut Commission and the North Pacific Fishery Management Council. Training to acquaint village fishermen with management and regulatory bodies and techniques is necessary for them to ensure their inclusion in decisions pertaining to their fishery.

### FISHING OPERATIONS

As mentioned, the main problem with fishing techniques was the ineffectiveness of the longlines. While total catch will probably be increased next year with more entry into the fishery and a possibly longer season, catch per unit effort would be greatly increased if the longlines produced more fish.

Fishermen used locally caught bait in the 1982 season, primarily herring and greenling. Since herring is designated for subsistence use only, taking herring as bait for the commercial halibut fishery is against Alaska Department of Fish and Game Regulations. This fall, it will be necessary to propose to the Alaska Board of Fisheries, an exception to this regulation, permitting several tons of herring to be taken for use as commercial halibut bait. If that is not successful, herring will have to be bought, probably from the Goodnews Bay or Cape Romanzoff fisheries. If the bait is purchased, a large storage capacity within the villages, to keep the bait fresh, will be required.

With an expanded fishery and longer season next year, the storage and shipping techniques used this season will not be adequate to handle the increased catch. Local snow was used to chill fish in this year's operation. In spite of the cold winter, snow was limited, and will not be sufficient if next year's snow supply is less or if the fishing season lasts into July. Storage space, i.e. large fiberglass fish totes, was limited. With a larger catch per day, there will not be enough capacity to hold snow and fish. During warm days, rapid melting of the snow necessitated frequent repacking of snow.

Both chilling and storage must be addressed before next season. An ice making machine must be bought or rented. Alternately, it may be more economical to have ice shipped directly to the villages from Bethel. A larger storage space, preferably close to both the airstrip and a convenient fish landing area should be prepared for next year, insulated in some way to reduce ice melt.

Packing and shipping the fish in 100 lb wetlock boxes proved adequate, although a greater inventory of boxes and liners should be on hand at the opening of the season.



The manager working only half time in Toksook Bay, was able to weigh, chill, head, pack and ship the catch landed in that village. However, in Tununak, where the catch was 3 times as large, the half time manager in Tununak was working long hours and eventually hired an assistant. Wages for the managers were \$2500, covered this season by CETA funds. Assuming that no such funds would be available during the 1983 season, fishermen will have to take the expense of hiring an manager into their overall costs. During this season, for example, the fishermen would have had their income reduced by \$.31/ lb if they had been responsible for the managers wages.

#### MARKETING

High quality, fresh halibut give the highest return to the fishermen. As long as Nelson Island halibut can be shipped fresh to markets in either Bethel, Fairbanks and Anchorage, this will bring in the best price.

Bethel is clearly the best market for Nelson Island halibut both in terms of shipping costs and quality. Over half of this year's catch was sold in Bethel, and there is the potential for doubling that amount. Better circumstances such as a location with adequate cold storage and an accurate scale are necessary before expansion of the halibut market in Bethel. A brokers license must be acquired.

Fairbanks appears to be the second best market since their supply of fresh fish is limited and the alternative market, Anchorage, is usually oversupplied with fresh halibut. This year's markets in Fairbanks should be continued and expanded with at least a small steady flow of halibut to retain continuity in the market.

It is anticipated that these two markets will be able to sell the increased catch from Nelson Island in 1983.

## MANAGEMENT AND REGULATIONS

The U.S. halibut fishery is currently regulated by two bodies, the International Pacific Halibut Commission and the North Pacific Fishery Management Council. As both the Nelson Island and the Pribilof Islands halibut fisheries are small but developing, fishermen from these areas must understand the workings of these two management bodies to ensure their inclusion in pertinent regulations.

The IPHC is responsible for designating commercial fishing areas and seasons for the halibut fishery with the goal of successfully biologically managing the fishery. Both seasons and areas produced problems in 1982 for the Nelson Island fishery. Currently, the Bering Sea fishing area includes all of the Bering Sea, north and south of the Aleutian chain and up the Alaska Peninsula to Cape Lutke. Traditionally, fishing within this large area is concentrated along the Aleutian chain and the Alaska Peninsula with a few large boats fishing outside of the Pribilofs. Generally, these boats fish alot of gear and can reach the Bering Sea quota in several weeks. As a result, fishing hundreds of miles north at Nelson Island and the Pribilofs is forced to shut down also. This short fishing time combined with a low CPUE resulted in small catches for the Nelson Island fishermen.

The 1982 seasons for the Bering Sea were not optimal for the Nelson Island fishery. As mentioned, the Cape Vancouver area was frozen during the May opening. The June opening was optimal as the expected July opening would have been if not for the early closure. The best fishing seasons for the Nelson Island fishery would be mid June through July.

A change in both the fishing season and designated open area will be necessary before the Nelson Island halibut fishery can expand. Since the IPHC currently manages by setting catch quotas per fishing area, the first step in increasing the season required to catch a quota would be to divide the

Bering Sea into two or more areas. This would allow the Nelson Island area to have a different quota from the Aleutian area. If heavy fishing obtained the southern Bering Sea quota in a matter of weeks, fishing might still be permitted in the northern Bering Sea.

Another alternative to short fishing seasons might be the share system of limited entry now being considered by the North Pacific Fishery Management Council. Shares, or individual catch quotas, could be allotted by past participation and landings in the fishery. Federal legislation which allowed the NPFMC to devise a limited entry system, specifically provides for three years participation in the fishery by coastal villages before allotting shares for these fishermen. However, until the share system is in effect, the short fishing seasons will make it difficult for fishermen to build up much of a fishing history from which to allot shares.

Probably the optimal fishing regulatory scheme for the Nelson Island fishery would be to divide the Bering Sea into a north-south district with a catch quota in each. Hopefully, fishing effort in the north Bering Sea area would be slow enough to allow considerable fishing time for the Nelson Island fishery. This would permit them to build up a sizeable fishing history before the shares system went into effect for those villages.

Staff at BSFA and fishermen from Nelson Island will be expressing their management and regulatory preferences for the upcoming season by submitting a proposal to split the Bering Sea into two management areas to the International Pacific Halibut Commission and attending their annual meeting in January to discuss seasons. In addition, fishermen will attend public hearings concerning the proposed limited entry plan for halibut by the NPFMC.