


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
Executive Director 

DATE: December 27, 1994

SUBJECT: Halibut Charterboats

ESTIMATED TIME 3 HOURS
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ACTION REQUIRED

- (a) Receive Report from Halibut Charter Working Group.
- (b) Consider next steps.

BACKGROUND

In May 1993, a proposal to cap the guided sport halibut fishery in Alaska at 1992 catch levels was submitted to the Council. The proposal specified that the need for action is a recent increase in the recreational halibut fishery, which has in turn, reduced halibut available to the directed fishery. Under the current system, the sport catch (along with mortality from waste, bycatch, and personal use) is taken off the top of the overall halibut quota, and the directed setline fishery is then allocated the remainder.

In September 1993, the Council addressed this issue and received public testimony. Information indicated that the charter industry has grown and may be fully capitalized, and that some type of limited entry program might be appropriate for this fishery. A control date of *September 23, 1993* was set to notice the industry that a moratorium on the guided sport fishery may be implemented. The date was announced in the Council Newsletter, but not published in the Federal Register. The Council also established a working group comprised of staff, three commercial fishery representatives, one non-guided sport fishing representative, and six charter vessel representatives to examine traditional management tools and identify potential alternatives for managing this fishery.

At the January 1994 meeting, the Council received a report from the Halibut Charter Working Group. The Working Group recommended that the Council evaluate regional management areas and a logbook program for charter vessels, an expanded creel survey, individual annual catch limit (4 to 12 halibut per fishermen per year) for all recreational halibut fishermen, and the legality of restricting exports of recreational caught halibut. The Council requested that the Working Group provide additional detail on these recommendations and tasked the Working Group to provide a clear description of regional charter operations and to develop suitable elements and options for a regional or statewide moratorium on new entry of halibut charter vessels.

The Working Group met in March 1994 to discuss the proposed moratorium and make recommendations to the Council. The more recent Working Group's report, attached as (Item C-1(a)), along with the previous report (Item C-1(b)) should assist the Council with determining whether or not to initiate an analysis of a moratorium or other management measure for the guided sport fishery. Written public testimony regarding this issue is bound separately as Item C-1(supplemental).

**Second Report of the Halibut Charter Working Group  
to the North Pacific Fishery Management Council  
April 1994**

**Background**

In May 1993, the Alaska Longline Fishermen's Association (ALFA) submitted a proposal to the Council requesting that they initiate a Regulatory Amendment to limit harvests taken by the guided sport halibut fishery in Alaska to 1992 catch levels. ALFA used recent increases and projections in the recreational halibut fishery and the commensurate decrease in the halibut available to the directed fishery to justify the action. The allocation scheme for halibut is an issue because sport catch, personal use, and mortalities from bycatch and waste are subtracted from the overall halibut quota before the commercial fleet is allocated the remainder. Thus, when the biomass diminishes at the same time the sport catch grows, the commercial halibut quota is affected.

In September, the Council addressed this issue and received public testimony. Information indicated that the charter industry has grown and may be fully capitalized, and that some type of limited entry program might be appropriate for this fishery. A control date of *September 23, 1993* was set to notice the industry that a moratorium on the guided sport fishery may be implemented. The Council also established a working group comprised of staff, three commercial fishery representatives, one non-guided sport fishing representative, and six charter vessel representatives to examine traditional management tools and identify potential alternatives for limited access. The Working Group met twice in 1993 to discuss these issues.

At its January 1994 meeting, the Council received a report from the Halibut Charter Working Group. The report recommended that the Council evaluate regional management areas, a logbook program for charter vessels, an expanded creel survey, an individual annual catch limit (4 to 12 halibut per fishermen 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 Council requested that the Working Group provide additional detail on these recommendations for the April meeting. The Council also tasked the Working Group to provide a clear description of regional charter operations and to develop suitable elements and options for a regional or statewide moratorium on new entry of halibut charter vessels.

The Halibut Charter Working Group met in Juneau March 10-11 to discuss the issues and provide recommendations to the Council on how to proceed. Membership of the group differed from previous meetings due to substitutions and the addition of two charter representatives (Table 1). The meeting agenda included reports from the Alaska Department of Fish and Game (ADF&G), the Commercial Fisheries Entry Commission (CFEC), the International Pacific Halibut Commission (IPHC), and the National Marine Fisheries Service (NMFS). Public testimony was received from three people.

This report was written to summarize the Working Group's discussions and recommendations to the Council.

**State Legislation** - Paul Krasnowski (Director of Sport Fish Division, ADF&G) and CFEC staff presented a report on the status of state moratorium and licensing legislation. Legislation filed by Senator Taylor was developed to limit entry of charter boats. Problems encountered during legislation development include a lack of historical data on individual charter operators, and constitutional questions pertaining to the State's authority to restrict recreational fisheries. The focus of the bill then shifted to a vessel moratorium for vessels chartering for all species and waters, including freshwater. Again, data was lacking for this type of legislation, and constitutional questions remained unresolved. The draft legislation has been passed off to the House Resources Committee, but has not been formally submitted to the

legislative session.

Rather than continue to pursue moratorium legislation, Representative Williams drafted and filed a bill to require licensing of all sport fish guides. The bill defines sportfish guiding, sets a registration fee for guides, and empowers a committee to adopt administrative regulations to require reporting. The guide licensing bill (HB 496) was drafted specifically to address the lack of available data (e.g. participation records) for guided fisheries. The bill is currently under review by the House Resources Committee. As currently written, the fees collected through guide licenses (\$200 each) would go into the general fund, and then may be appropriated to state agencies for management purposes. Some charter associations support this legislation, but others do not. Associations not supporting the legislation would like to see collected funds dedicated to management of guided fisheries.

Export Limits - Jonathan Pollard (NOAA GC) advised the Working Group that export limits could not be imposed. NOAA CG finds that there is no compelling justification to discriminate against fishermen who want to ship their lawfully landed halibut out of state to other states or countries. Such a regulation raises problems regarding equal protection provided under the 14th amendment to the US Constitution, as well the Halibut Act, which prohibits the discrimination between residents of different states. NOAA GC suggests that regulations be imposed to address problems at the harvesting stage, rather than regulating the distribution of lawfully harvested fish. The Lacey Act criminalizes the transport of unlawfully harvested fish, and imposes marking regulations on all fish and wildlife (including those taken legally) shipped out of State.

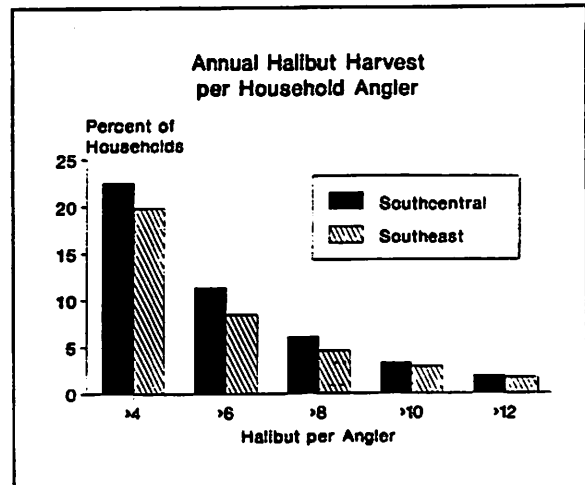
Logbooks - The IPHC and ADF&G staffs are satisfied with existing catch and effort data for the sport halibut fishery. They questioned the objectives of a logbook program and believed that a logbook program would duplicate existing efforts, and that the data collected would probably not be verifiable. For example, dock sampling already provides age, size, sex, and catch rate information for halibut taken by the fleet. Staff also believes the cost of implementing a logbook program, along with data entry and analysis, would be prohibitive given budget constraints of fishery management agencies. While the Working Group deferred to staff with respect to recreational catch and effort data, the group generally wants more refined data on the charter industry that would be important for analyzing allocation issues. In fact, much of this information would be collected under the proposed guide licensing bill (HB 496). Although a logbook program (perhaps funded through Sea Grant) may provide some information on the charter industry, questions remained as to whether the information collected would be verifiable.

Harvest Surveys - The Alaska Department of Fish and Game (ADF&G) collects information about the sport halibut fishery through an annual mail-out survey, angler interviews, and samples of the sport halibut harvests. The mail-out (or postal) survey, is sent out to approximately 30,000 households with licensed anglers. About one-half are returned. The results are used to estimate annual recreational angler effort and their catch and harvest of major target species throughout Alaska. Managers are confident that estimates derived from this survey are accurate. The IPHC uses survey data to assess annual removals of halibut by recreational anglers fishing off Alaska. Additionally, survey data are used to evaluate possible impacts an annual catch limit would have on recreational halibut harvest and the proportion of the harvest and effort that is guided or non-guided at select ports. ADF&G also conducts angler survey interviews at some ports throughout Alaska. Returning anglers are randomly asked about their fishing success, areas fished, and whether they were guided or not. Data from these surveys are used to define areas fished by user groups, analyze effort and harvest by guided and non-guided anglers, and assess possible changes to daily bag limits. Also, a random sample of landed halibut are measured (sometimes weighed) and sexed and ear bones (otoliths) are removed to determine age. These data are used by the International Pacific Halibut Commission to determine the pounds of halibut annually removed by

recreational anglers and to estimate the size of the halibut population. These data are also being used to assess the effects possible size limits may have on recreational harvests.

**Creel Surveys** - A creel survey is a common method for obtaining recreational fisheries data. During creel surveys, anglers are asked about their effort and success and independent surveys of total effort are conducted. When combined, these data can be used to estimate total recreational angler effort and harvest. At some ports in southeast Alaska, the department conducts creel surveys to estimate the number of chinook salmon harvested on a daily or weekly basis. This information is required to implement a management plan which calls for inseason management of this fishery. Because the target of the survey is chinook salmon, the survey is designed to provide accurate estimates of this species. Anglers are asked about their halibut success; however, because the survey is not designed with respect to this species, incomplete or inaccurate estimates may be derived with respect to halibut. Creel surveys are generally expensive; for example, the southeast Alaska chinook salmon creel survey costs about \$500,000 annually. The department does not have plans to implement a creel survey for halibut in the future.

**Annual Harvest Limits** - Doug Vincent-Lang (ADF&G) reported on how many anglers would be affected by instituting annual catch limits ranging from 4 to 12 halibut per angler. Data from the 1990-1992 ADF&G postal surveys were analyzed to assess the average number of halibut harvested by recreational anglers annually. Data indicate that most households (over 78%), that catch any halibut, take 4 or less halibut per angler annually. Annual harvest per household declines thereafter, such that only 2% of the households, on average, harvest more than 12 halibut per angler annually. A complete report on annual harvest limits is available through the Council office. The Working Group had no recommendations on annual harvest limits, but expressed concern about potential impacts on sport anglers who fished for subsistence. It was also noted that annual harvest limits may increase high-grading in the sport fishery.



**IPHC License Trends** - Calvin Blood (IPHC) prepared a summary of IPHC license data from 1989-1993. Licenses categories are commercial, sport, and both commercial/sport. Commercial vessels can be identified as active through the filing of fish tickets, but the IPHC database cannot identify active sport licenses. Trends in licensing of sport and commercial/sport vessels are illustrated in Figure 1. Again, these license trends may not necessarily reflect trends in the number of active charter vessels. A complete report is available through the Council office. It was noted that following the September 22, 1993 control date, 30 sport licenses were issued through the end of 1993. At least some of these 30 licenses were issued to charter operators who were previously operating not knowing they needed a license. Information about the 1994 applicants is not yet available.

**Regional Areas and Fleet Characterization** - Working Group members from the charter industry provided descriptions of the charter fleet in their respective regional areas. Fishing operations are described for most of the major ports. Many other communities (particularly in southeast) also have halibut charters, but little information was available regarding the fishery in these areas. Regional descriptions are summarized below.

**Juneau** - Only 4 boats charter primarily for halibut; most charters target salmon. Although there are 100 boats with IPHC permits to charter for halibut, many of these appear not to be active. Some truly active halibut charters do not have IPHC licenses. Local depletion occurred in the mid-1980's and vessels must now travel out to Icy Strait to get into good halibut ground. A large private fleet also targets halibut in Icy Strait and some local, less productive areas. Much of the charter industry relies on clients from cruise ships, and salmon is the primary target species. Many of the salmon charters hold IPHC licenses so that if a halibut is caught, it can be legally landed. Effort on halibut is not expected to increase with a new regulation of 1 salmon/day bag limit because of longer running times to the halibut grounds. Also, as with all southeast areas, vessels are limited to having only 6 lines in the water at one time. The number of charter operations has apparently not increased over the past 5 years.

**Sitka** - Half of the estimated 50-60 charter boats in Sitka are active full time. Almost all have IPHC licenses. The charter fleet targets both salmon and halibut and operates within 15 miles of town. In addition to lodge and day charters, the fleet take out a limited number of cruise ship clients on 4 hour trips. There are also several large boats making multi-day charters that depart from Sitka area. As with all fishing charters in the region, even the large vessels are limited to 6 lines in the water at a time. Some local depletion of halibut resource may be occurring, as evidenced by decreased sport catch rates. Although 120 vessels are licensed to charter by the IPHC, only slow growth in the number of active charter operations is expected to occur in future years due lack to infrastructure; however, a planned harbor expansion could contribute to new growth.

**Ketchikan** - Although 200 boats have IPHC permits, fewer are thought to be active. Most are day boats that target on salmon and take halibut as incidental bycatch. The "six line limit" restricts effort per vessel. Many of the day boats rely on cruise ships for clients. There are also a number of lodges in the Ketchikan area, including one large lodge that operates up to 24 vessels, and a floating lodge. The representative from Ketchikan reported that many of the vessels licensed were "write off the loss" (IRS) boats that will never become active in the fishery. Growth of the charter industry is constrained by a limited number of available slips, market demand, accessibility, and availability of hotel accommodations.

**Valdez** - A total of 32 boats actively charter in Valdez; 8 of these are full time and provide a primary source of income for their owners. Five vessels offer multi-day charters and the rest operate day trips. Although cruise ships visit Valdez, they do not remain in port long enough for the halibut charter fleet to attract clients from these ships. No fishing lodges exist in Valdez. The best fishing grounds for halibut are out past Montague Island, so fast (and expensive) vessels are required. The fleet expanded following the oil spill, but growth of the charter industry has since slowed.

**Cordova** - Only 2 charter vessels actively operate out of Cordova. A hotel is being built however, and some growth of the fleet may occur with an increase in tourism. Additional growth could occur if Cordova was connected to the road system.

**Whittier** - A total of 9 charter vessels actively operate out of Whittier, yet only 4 vessels focus on fishing; the others offer sightseeing charters. These are all multi-day charters. Productive halibut grounds are located some distance from Whittier. No lodges or other infrastructure is available in Whittier, so that growth in the charter industry is limited. Transportation to Whittier is by train only at this time; however, some growth in the charter fleet would be expected if

Whittier was connected to the road system.

**Kodiak** - There are over 60 boats with IPHC charter licenses in Kodiak, however only 30 have been identified as legitimate operations (those with all required licenses). Three of these are large multi-day vessels. Charters offer a mixed bag of fishing opportunities for salmon, rockfish, lingcod, and halibut. Hunting charters are also made by the fleet. An estimated 18-20 lodges include fishing operations around Kodiak. Although Kodiak also has a large private fishing fleet, it is subject to weather restrictions. Charter boats generally operate within 35 miles of town, but have been moving further offshore to get into higher concentrations of halibut. Growth in the charter fleet is expected due to hard times faced by the commercial salmon industry, and a new harbor expansion that is underway. Limited infrastructure and extra travel costs may offset this growth to some extent.

**Seward** - There are currently 31 active charter operations in Seward; of these, 22 are 6-pack vessels, and 9 carry more than 6 passengers. Nearly all (25) of the vessels are full time. Many (16) of the boats target halibut, and the rest offer combination salmon/halibut trips. There are no fishing lodges in or around Seward. A very large private fishing fleet operates out of Seward targeting halibut, rockfish, lingcod, and salmon. The charter fleet makes day trips only, but is directing effort further from town (to 45 miles) to take advantage of better fishing. Some growth in the charter fleet is expected because cruise ships will be docking in Seward for longer periods beginning in 1994, and a boat harbor expansion has been proposed.

**Homer** - Homer is called the "Halibut Fishing Capital of the World", with an estimated 124 vessels actively chartering for halibut. Of these, 99 are 6-packs (many part time), and 25 carry more than 6 fishermen. All but 2 vessels have IPHC licenses. Nearly the entire fleet operates day charters; only 3 offer multi-day charters. Charters operate less than 45 miles from Homer for fishing, but may travel further for hunting charters. More recently, however, charter boats have travelled further from town to reach better halibut fishing, better sightseeing, and to avoid interaction with the private fleet. Some vessels combine fishing with sightseeing. The private fleet in Homer is very large, and targets halibut and salmon. Growth of the fleet has mirrored growth in infrastructure (i.e. hotels), but due to limited slip space and infrastructure, significant growth in charter services is not expected in the near future.

**Anchor Point** - A total of 13 boats charter for halibut and salmon out of Anchor Point. All of these are 6-pack boats in the 18-26' range. Eleven of these boats operate full time, up to 120 days at sea per year. All but one boat is IPHC licensed. Fishing grounds are located within 20 miles of the mouth of the Anchor River. Growth in the business has been slow and steady.

**Deep Creek** - Deep Creek has been called the "combo- capital of Alaska", with 209 boats actively chartering for both halibut and salmon. Seventy-nine of these boats operate full time. The fishery takes place within 6 miles of the State Park beach. The fishery has grown drastically over the years due to restrictions placed on the Kenai River king salmon fishery and the availability of a tractor boat launching service. Growth is now limited by the number of boats that can be launched and retrieved by the tractors. No infrastructure is available in Deep Creek; clients spend the night in tents, RV's, or out of town, and even camping infrastructure is fully utilized. Significant growth in charter services is not expected at this location.

**Moratorium Evaluation** - Charter and sportfish representatives believe that a moratorium was not a reasonable solution to the problem as identified by ALFA. In fact, they do not feel that a problem even exists. ALFA's original justification for a cap was based on an IPHC report that showed a growing sport fishery rapidly overtaking the commercial fleet's quota. But, charter and sportfish representatives counter that: 1) sport landings of halibut in Alaska have actually declined from 6.0 million pounds in 1991 to less than 5.6 million pounds in 1993; 2) commercial quotas in the Gulf of Alaska halibut regulatory areas 2C and 3A increased from 30.7 million pounds in 1993 to 37.0 million pounds in 1994; 3) implementation of IFQ's in 1995 will make more halibut available through reductions in bycatch and waste; and 4) a revised forecast jointly authored by ADF&G and IPHC predicts slower sport growth than originally reported.

The Council needs to decide on some specific policy directions before industry can engage in a specific discourse. Although continuing evaluation of the halibut charter issue by the Council implicitly indicated that the Council believes a problem may exist, the absence of a problem statement inhibited the Working Group's discussion of appropriate moratorium elements and options. For example, the charter industry defines a moratorium as a "time out" to collect and evaluate data and not as a means to limit entry, whereas a Council definition might seek to address overcapitalization or growth spikes. If additional data were not collected during the time out (which may be the case due to limited agency funding), then charter representatives were not interested in having a time out. The policy goals will determine the purpose for collecting data; is it needed to generate an accurate picture of the industry, to develop participation records, or to evaluate the relationship between removal rates and regional participation.

As part of their evaluation of a moratorium, the Working Group listed the following pros and cons for regional or statewide moratorium. Cons listed are applicable to either a regional or a statewide moratorium.

**Statewide moratorium PROS:**

- establishes a baseline for the fishery
- protects current participants from competition
- requires fewer regulations than regional moratorium
- maximizes use of the regulation as an allocation tool
- forces diversification of the chartering industry
- allows for movement of operations between areas

**Regional moratorium PROS:**

- provides for more fine tuning of moratorium criteria
- addresses only the areas of concern
- prevents unnecessary restrictions
- prevents unnecessary non-retention mortality
- establishes areas for other management measures
- provides areas to compare when assessing impacts

**Moratorium CONS:**

- does not limit the absolute harvest of halibut
- restricts the opportunity for access to halibut for recreational fishermen
- restricts growth of charter industry and infrastructure
- increases non-retention mortality
- increases the impact on other fish stocks such as rockfish and lingcod (for which ADF&G has biological concern in some areas)

- adds additional costs to government for enforcement
- raises legal issues regarding restriction of sport fishermen
- restricts business opportunity for participants
- adds additional costs to government for analysis and management
- increases charter prices to public by lowering competition
- may allow for unrestricted growth in other areas if applied regionally
- if no problem exists, then it is an unnecessary regulation

The Working Group did not reach consensus about a moratorium. Only the Sitka and Kodiak representatives believe their areas are fully capitalized. They argued that a "time out" would be a useful tool to manage the charter fleets in their regions. Other charter representatives disagreed. However, since the Working Group was tasked by the Council to develop suitable moratorium elements and options, they struggled hard to develop some parameters for the Council to consider should they decide to proceed forward with a "time out".

*Length of moratorium* - The group recommends that any moratorium be as short as possible, but the durations may differ regionally. There should be a sunset date with no renewal. Moratoriums in Alaska established by the CFEC are limited to a maximum of 4 years in duration, and cannot legally be extended.

*Qualifying Criteria* - The group believes that a moratorium on vessels would be more appropriate than on entry of new persons. Qualifying criteria could include possession of an IPHC sport or sport/commercial license prior to the control date, or some later date. A later date would allow a window of opportunity for active vessels without IPHC licenses and for those vessels in the pipeline to participate in the fishery during a moratorium. Licenses should be attached to vessels. There should not be a requirement for the owner to be on board, as it would severely impact lodges and operations that lease vessels or operate multiple vessels.

*Replacement of vessels* - The group agrees that it would be important to include a provision for replacement of vessels, but perhaps restrict them to the same client capacity (e.g. 6-packs can be replaced only with 6-packs). In Southeast, due to a six line limitation, replacement criteria may be less restrictive.

*Transferability* - The consensus of the group was that vessels should be able to be sold with or without the license and fishing rights, but time should be limited (2 years?) for unattached licenses to remain in limbo. Sales of licenses would occur privately rather than through a government clearing house. It was also suggested that provisions be included for temporary transfers of licenses from one vessel to another, in case one breaks down. Some considerations should be given to transferability between regions.

Other Issues - Other issues surfaced several times during the Working Group meeting that the Council should note.

1. The charter and sportfish representatives were very concerned that, once implemented, the commercial halibut IFQ program will deplete nearshore halibut stocks and crowd charter and unguided recreational fishermen off their traditional grounds. Charter representatives heard that this situation occurred in Canada subsequent to ITQ implementation there. Charter or sportfish representatives may propose that the Council establish exclusive recreational zones. Note, however, that the IPHC considers halibut in the Pacific Northwest as a single stock and manages it accordingly. They believe that, while local depletions may occur within a season, the single stock biomass evens out again between seasons and that there is not need for concern about biological overfishing.



2. There was some discussion about the State issuing a Halibut Stamp, similar to the stamp required for king salmon throughout Alaska. This stamp would provide a means to collect user fees to fund data collection programs and management of the recreational halibut fishery. Issuance of a halibut stamp would require legislative approval. To date, no legislation has been submitted for consideration to the Alaska legislature.

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Table 1. Membership of the 3/94 Halibut Charter Working Group meeting, and assigned Staff.

**MEMBERS**

*Commercial Representatives:*

Shari Gross (Chair), Halibut Association of North America  
Dan Falvey, Alaska Longline Fishermen's Association  
John Bruce, Deep Sea Fishermen's Union

*Sportfish Representatives:*

Greg McIntosh, Alaska Sportfish Association

*Charter Representatives:*

Tim Evers, Deep Creek Charter Association  
Wayne Carpenter, Seward Charterboat Association  
Eric Stirrup, Kodiak Charter Association  
Darrel Shreve, Valdez Charterboat Association  
Barbara Bingham, Sitka Charter Boat Operators Association  
Bob Ward, Homer Charter Association  
Dan McQueen, Ketchikan Marine Charters  
Ken Parker, Juneau Charter Association

**STAFF**

Steve Kaimmer, International Pacific Halibut Commission  
Jay Ginter, National Marine Fisheries Service  
Doug Vincent-Lang, Alaska Department of Fish and Game  
David Witherell, North Pacific Fishery Management Council

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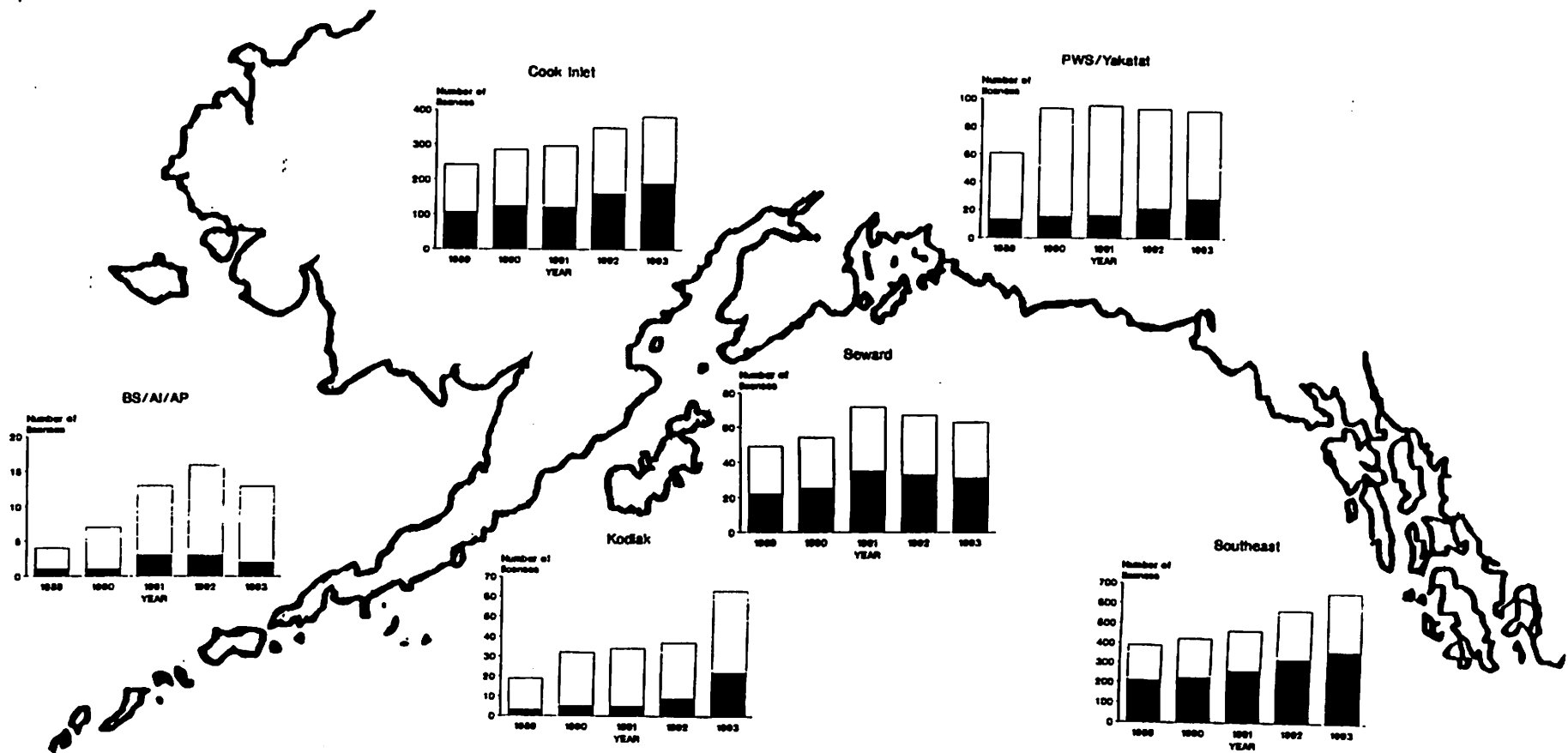


Figure 1. Trends in IPHC halibut charter licenses for six regional areas in Alaska, 1989-1993. Solid bars denote sport licenses, and open bars denote sport/commercial licenses. Note that the Y-axis scale may differ greatly among areas.

**Report of the Halibut Charter Working Group**  
to the North Pacific Fishery Management Council  
January 1994

Background

In May 1993, the Alaska Longline Fishermen's Association (ALFA) submitted a proposal to the Council requesting that they initiate a Regulatory Amendment to limits harvests taken by the guided sport halibut fishery in Alaska to 1992 catch levels. ALFA used recent increases in the recreational halibut fishery and the commensurate decrease in the halibut available to the directed fishery to justify the action. The allocation scheme for halibut is an issue because sport catch, personal use, and mortalities from bycatch and waste are subtracted from the overall halibut quota before the commercial fleet is allocated the remainder. Thus, when the biomass diminishes at the same time the sport catch grows, the commercial halibut TAC is affected.

In September, the Council addressed this issue and received public testimony. Information indicated that the charter industry has grown and may be fully capitalized, and that some type of limited entry program might be appropriate for this fishery. A control date of *September 23, 1993* was set to notice the industry that a moratorium on the guided sport fishery may be implemented. The Council also established a working group comprised of staff, three commercial fishery representatives, one non-guided sport fishing representative, and six charter vessel representatives to examine traditional management tools and identify potential alternatives for limited access. Membership of the group is listed in Table 1. The working group was asked to report back to the Council at its January 1994 meeting.

Working Group Meetings

The Halibut Charter Working Group met November 8 and December 20, 1993 to discuss the issue and make recommendations to the Council on how to proceed. The meeting agendas included an overview of the Council process, review of ADF&G data, and IPHC stock assessments and allocations. Officials from the Alaska State Division of Tourism presented their agency's projections for the growth of tourism in the state. The Halibut Regulatory Amendment Advisory Group's (RAAG) suggested alternatives were examined: 1) status quo, 2) harvest limits, 3) license limitation, 4) individual fishing quotas, and 5) traditional management measures. Both meetings included testimony from the public.

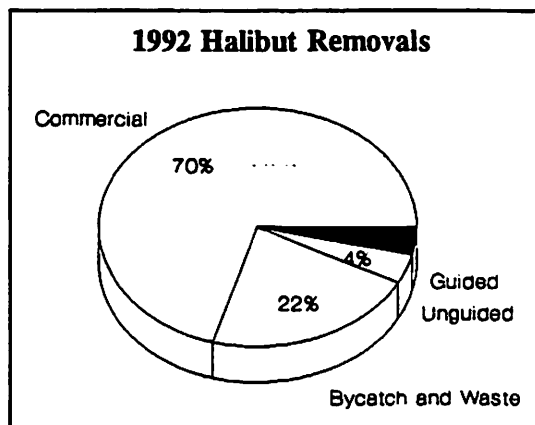
Public testimony provided some insight on the nature of the halibut charter industry. Charter companies typically own one to six or more vessels, which may operate full or part time. Full time vessels may operate 80 to 100 days at sea, depending on weather and the number of clients that can be retained. Prices range from about \$110 to \$170 per person for a daily charter from Homer, Seward, and Valdez. Success rates for individual fishermen have been about 1.75 halibut per angler in these areas. Other primary ports for halibut charters include Kodiak, Deep Creek, Sitka, Juneau, Petersburg, Ketchikan, and others. Regional differences in the operation of these charters exist, primarily due to distance from the fishing grounds, presence of military charters or cruise ships, and local regulations. In 1993, 1,249 vessels were licensed by the IPHC to sport charter for halibut, primarily in Southeast and Cook Inlet (Table 2).

The current sport fishing regulations in Alaska allow for a two halibut daily bag limit, with a two day (4 fish) possession limit. There is currently no minimum size restrictions on sport caught halibut. The legal season runs from February 1 through December 31, although halibut abundance, seasonal tourism, and weather have restricted chartering to May through September. Individual fishermen must be licensed, and are limited to one line with a two hook maximum. These regulations are imposed on guided and non-guided fishermen equally.

## Underlying Differences

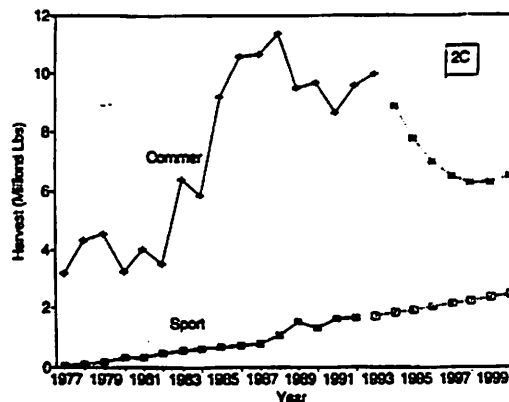
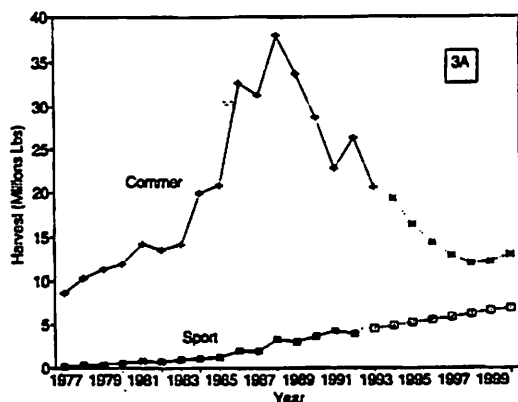
The Working Group divided consistently across industry lines (7 to 3) on most issues, thus often rendering either consensus or majority vote a useless indicator for the Council. The split stemmed from disagreement about three issues fundamental to the sport and charter members, that inhibited serious discussion about any of the alternatives suggested by the Halibut RAAG Committee.

1. The sport and charter members believe that there is no need for a cap on their industry, because it is relatively small. They point to the harvests and compare 6.5 million pound sport catch in 1992 (8% of total halibut removals coastwide) to 59 million pounds (70%) caught by commercial longliners (Figure 1). Assuming that about one-half of the sport harvest is taken by chartered fishermen, total removal of halibut by this user group was about 3.2 million pounds (3.8%) coastwide. For direct comparison, coastwide landings by chartered fishermen totaled about 5% of commercial catch in 1992. The relative proportion of halibut taken by sport fishermen varies regionally; 1992 sport removals were 11% in Area 3A (Southcentral) and 15% in Area 2C (Southeast Alaska).



2. The sport and charter members suggest that if conservation is the problem the proposal seeks to address, and if fairness is a doctrine basic to the Magnuson Act, then the Council should reduce trawl bycatch caps. In 1992, for example, 15.7 million pounds of halibut were removed as bycatch and another 2.5 million pounds classified as waste (Figure 1). The group discussed how implementation of commercial halibut IFQs may help reduce bycatch, waste, and overages, and the sport representatives agreed to join with the commercial industry in finding solutions to reduce bycatch.

3. Many of the Working Group's sport and charter members did not agree with the joint IPHC and ADF&G analysis (attached) of growth projections for the sport fish catch in Alaska. Many questioned the accuracy of the data used in the projections, and cited a decrease in sport landings in 1992. The Division of Tourism's predictions for tourism growth were also met with skepticism by many charter members. Conversely, the Groups commercial representatives, though not dedicated to one rate, believe that tourism will continue to grow and that boat harbors, hotels, plane flights, and other services will develop to meet demand.



### Recommendations to the Council

Despite underlying differences that were problematic to the Working Group, they reached consensus on a number of issues. Specifically, they recommend that the Council:

1. Reduce bycatch in all fisheries. The charter industry has resolved to work with the Council in finding ways to reduce bycatch;
2. Evaluate an individual annual catch limit and reporting system for all recreational halibut fishermen. The charter industry has resolved to promote the wise use ethic in the sport halibut fishery, and suggested analyzing catch limits of 8, 10, and 12 halibut per year;
3. Encourage ADF&G and the IPHC to improve their collection of catch, effort, and age composition of halibut taken by sport fishermen;
4. Develop a logbook program for charter vessels;
5. Recognize that regional differences and varying stages of development in Alaska mandate a flexible regulatory scheme and not one that is uniformly applied throughout the state;
6. Request an opinion from NOAA General Council about the legality of imposing limits on the number of halibut that can be exported out-of-state.

### Other Issues Discussed

Two other issues surfaced several times during the Working Group meetings that the Council should note.

1. The charter fleet generally believes that guided and unguided sport fishermen should remain as a single category and not be regulated separately.
2. The charter associations believe that, once implemented, the halibut IFQ program will deplete nearshore halibut stocks and crowd the recreational fishermen off their traditional grounds. They may recommend that the Council consider establishing exclusive recreational zones in the future.

### Halibut RAAG Alternatives

The Group could not reach consensus on alternatives to recommend that the Council examine. Because most sport and charter representatives do not believe that an allocation problem exists, they recommend that the Council accept status quo. Further, they insist on their absolute need for an uninterrupted season and a two fish per day bag limit to ensure continued economic viability.

Commercial longliners, on the other hand, argued that in the absence of a fixed allocation, the growing sport fishery allocation is increasing annually. They recommend that the Council examine alternatives to limit the growth of the sport fishery.

Given this standoff, the Working Group can only offer the Council the sport and charter members rationale for rejecting all the alternatives except status quo.

*Harvest Limits:* Charter operators rejected the idea of a fixed or floating cap. They were concerned that harvest limits may cause the fishery to shut down prematurely, causing unpredictable seasons and jeopardizing client reservations. They also believed that adjusting season lengths to restrict harvest would have a negative impact on charter operations and support facilities (motels, restaurants, etc.). Commercial committee members concurred with the disruptive effects, but pointed out that the entire commercial fleet has had to learn to live with them for several years.

*License Limitation:* Although a moratorium, "time out", or permit limitation program, was considered acceptable to some, the Group could not agree to analyze these programs.

*Individual Fishing Quotas:* This alternative was soundly rejected by the charter industry. Concerns identified were: 1) the possible migration of quota shares (QS) from the commercial to charter fisheries may negatively impact small communities, 2) analysis of IFQs and allocation of QS would be contentious and time consuming, 3) problems identified in other fisheries which may be solved by IFQs (e.g. safety concern, derby fishery, gear loss), do not exist in the charter fishery, 4) the charter business sells people a fishing experience rather than pounds of fish, 5) charter vessels would target small halibut and/or pressure anglers not to retain fish, and more importantly, 6) monitoring and enforcement would be overly cumbersome, complex, and expensive.

*Traditional Management Measures:* Maintaining current catch levels of the guided sport fishery for halibut by restricting the size of fish caught, seasons, daily bag limits, or possession limits was considered unacceptable to many sport and charter fishermen. Two fish per day was considered a minimum. Although size limits were discussed, no recommendations were made. The sport and charter representatives made a major concession when they agreed to request that the Council analyze individual annual harvest limits for all recreational users. This issue is further discussed above in the Recommendations section of this report.

**Table 1. Membership of the Halibut Charter Working Group, and assigned Staff.**

**MEMBERS**

**Shari Gross (Chair), Halibut Association of North America**

**Dan Falvey, Alaska Longline Fishermen's Association**

**Doug Ogden, Alaska Sportfish Association**

**Ed Dersham, Anchor Point Charter Association**

**Wayne Carpenter, Seward Charterboat Association**

**Eric Stirrup, Kodiak Charter Association**

**Jim Heston / Darrel Shreve, Valdez Charterboat Association**

**Bill Foster, Sitka Charterboat Association**

**Al Johnson, Homer Charter Association**

**Jack Knutson, Fishing Vessel Owners Association**

**STAFF**

**Calvin Blood, International Pacific Halibut Commission**

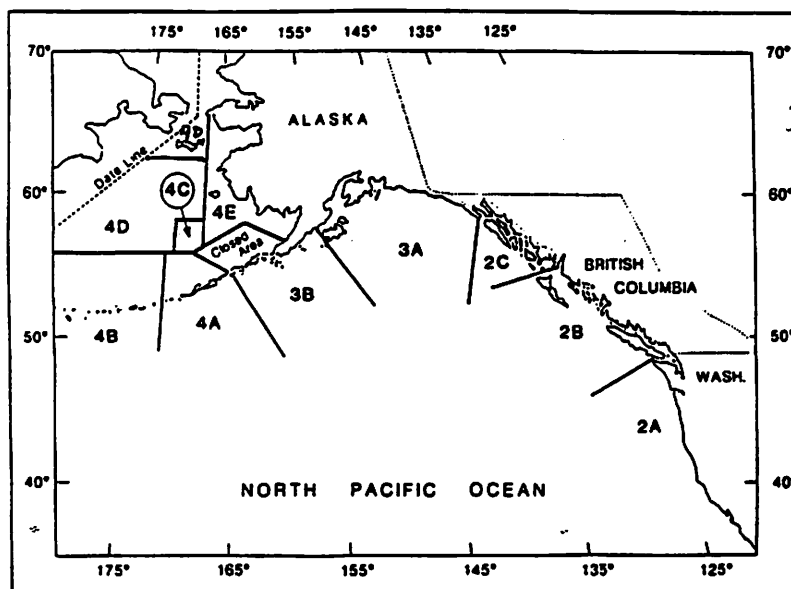
**Jay Ginter, National Marine Fisheries Service**

**Doug Vincent-Lang, Alaska Department of Fish and Game**

**David Witherell, North Pacific Fishery Management Council**

Table 2. Number of vessels licensed by the IPHC in Alaska regions, 1993.

<u>Area</u>	<u>License Category</u>		<u>Total</u>
	<u>Sport</u>	<u>Both</u>	
Cook Inlet	192	186	378
Southeast	357	292	649
PWS/Yakutat	27	64	91
Seward	30	32	62
Kodiak	19	37	56
AP/AI/BS	2	11	13
	-----	-----	-----
	627	622	1,249





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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA  
AND THE UNITED STATES OF AMERICA

AGENDA C-1  
JANUARY 1995  
SUPPLEMENTAL

P.O. BOX 91433  
SEATTLE, WA 98145-2009

TELEPHONE  
(206) 634 1838

FAX  
(206) 632-2983

MEMO

To: Dave Witherell, NPFMC

January 5, 1995

From: Bob Trumble *RT*

Subj: Updated Sport Halibut Data

Enclosed are a set of tables describing changes in halibut licenses, a figure showing sport halibut harvest with projections through 1998, and a table of sport halibut harvest from 1989 to 1993. The first of the tables summarizes number of vessels licensed for both sport and commercial (B), commercial only (C), and sport only (S). Subsequent tables break out each region from the summary table into licenses by port. In general, the number of commercially-licensed vessels is decreasing, and vessels licensed for sport and both are increasing.

The figure shows the estimates of halibut sport harvest in Areas 2B, 2C, and 3A. In both Alaskan areas, catch is continuing to increase, with a substantial jump from 1992 to 1993. Projections of future harvest use a six-year regression of catch in numbers, converted to weight with the most recent average weight for each area.

As general information to go along with the harvest table, we have projected sport harvest at 1.80 million pounds for 1995 in Area 2C, and 5.28 million pounds for 1995 in Area 3A. Also, we projected the 1994 sport harvest as 1.84 million pounds in Area 2C and 4.36 million pounds in Area 3A. While the 1994 2C projection was close, we under projected in Area 3A.

enc.

Region	Port	License Category	1989	1990	Year 1991	1992	1993	1994
	Cook Inlet	B	137	162	178	190	192	218
		C	1055	1056	1020	834	666	628
		S	106	124	120	160	191	281
	Southeast	B	181	199	205	248	294	347
		C	2152	2117	2296	2279	2049	1874
		S	208	223	259	321	364	499
	PWS/Yakutat	B	48	78	79	72	64	76
		C	248	369	434	352	245	220
		S	13	15	16	21	28	39
	Seward	B	27	29	37	34	32	32
		C	112	127	112	100	84	79
		S	22	25	35	33	31	44
	Kodiak	B	16	27	29	28	41	63
		C	530	579	604	532	440	409
		S	3	5	5	9	22	41
	BS/AI/AP	B	3	6	10	13	11	21
		C	310	541	435	396	363	393
		S	1	1	3	3	2	2
	Totals	B	412	501	538	585	634	757
		C	4407	4789	4901	4493	3847	3603
		S	353	393	438	547	638	906

Region	Port	License Category	1989	1990	Year 1991	1992	1993	1994
Anchor Point		B	4	7	8	10	9	11
		C	26	18	21	21	19	19
		S	1	2	3	3	7	9
Anchorage		B	17	17	21	18	20	22
		C	92	99	112	83	63	51
		S	3	4	3	9	11	21
Deep Creek		B	2	2	5	5	7	4
		C	1	1	1		1	
		S	1	3	2	5	6	15
Homer		B	78	87	93	95	89	99
		C	464	462	443	370	302	304
		S	59	61	54	62	73	95
Kasilof		B		3	6	7	8	7
		C	74	78	64	51	41	42
		S	4	3	2	2	2	5
Kenai		B	10	12	16	13	16	20
		C	196	207	202	146	124	112
		S	9	8	12	19	18	24
Ninilchik		B	9	14	14	19	20	21
		C	44	43	47	38	20	26
		S	8	17	16	25	27	42
Seldovia		B	4	4	5	6	5	9
		C	46	40	36	35	25	16
		S	1	1	1	2	2	5
Soldotna		B	3	7	4	7	8	12
		C	32	30	25	27	22	11
		S	13	19	20	21	30	45
Wasilla		B	2	2	1	3	3	3
		C	8	8	11	5	5	7
		S	1	1	2	3	2	2
Others(22)		B	8	7	5	7	7	10
		C	72	70	58	58	44	40
		S	6	5	5	9	13	18
Totals		B	137	162	178	190	192	218
		C	1055	1056	1020	834	666	628
		S	106	124	120	160	191	281

Region	Port	License Category	1989	1990	1991	1992	1993	1994
	Craig	B	4	9	13	17	20	22
		C	65	70	81	78	70	65
		S	3	1	1	2	6	17
	Elfin Cove	B			1	6	6	6
		C	20	26	23	19	20	21
		S	7	8	7	9	9	16
	Gustavus	B	7	10	9	11	10	12
		C	17	21	23	20	16	10
		S	8	4	6	6	8	15
	Juneau	B	28	33	30	37	52	62
		C	604	634	637	657	585	582
		S	43	42	34	40	48	74
	Ketchikan	B	29	31	37	42	50	50
		C	179	168	177	153	138	127
		S	52	78	99	139	150	167
	Killsnoo	B			1	1	1	2
		C	4	4	5	2	1	
		S			8	16	15	15
	Petersburg	B	5	5	10	14	20	27
		C	257	254	300	304	285	240
		S	10	9	13	15	19	20
	Sitka	B	42	44	47	61	79	100
		C	328	302	342	334	293	267
		S	16	16	21	28	41	59
	Thorne Bay	B	2	1	1	1	1	1
		C	6	5	2	4	3	2
		S	3	6	7	8	6	6
	Wrangell	B	18	15	12	11	13	11
		C	138	137	158	157	137	116
		S	7	5	5	5	7	12
	Others(40)	B	46	51	44	47	42	54
		C	534	496	548	551	501	444
		S	59	54	58	53	55	98
	Totals	B	181	199	205	248	284	347
		C	2152	2117	2296	2279	2049	1874
		S	208	223	259	321	364	499

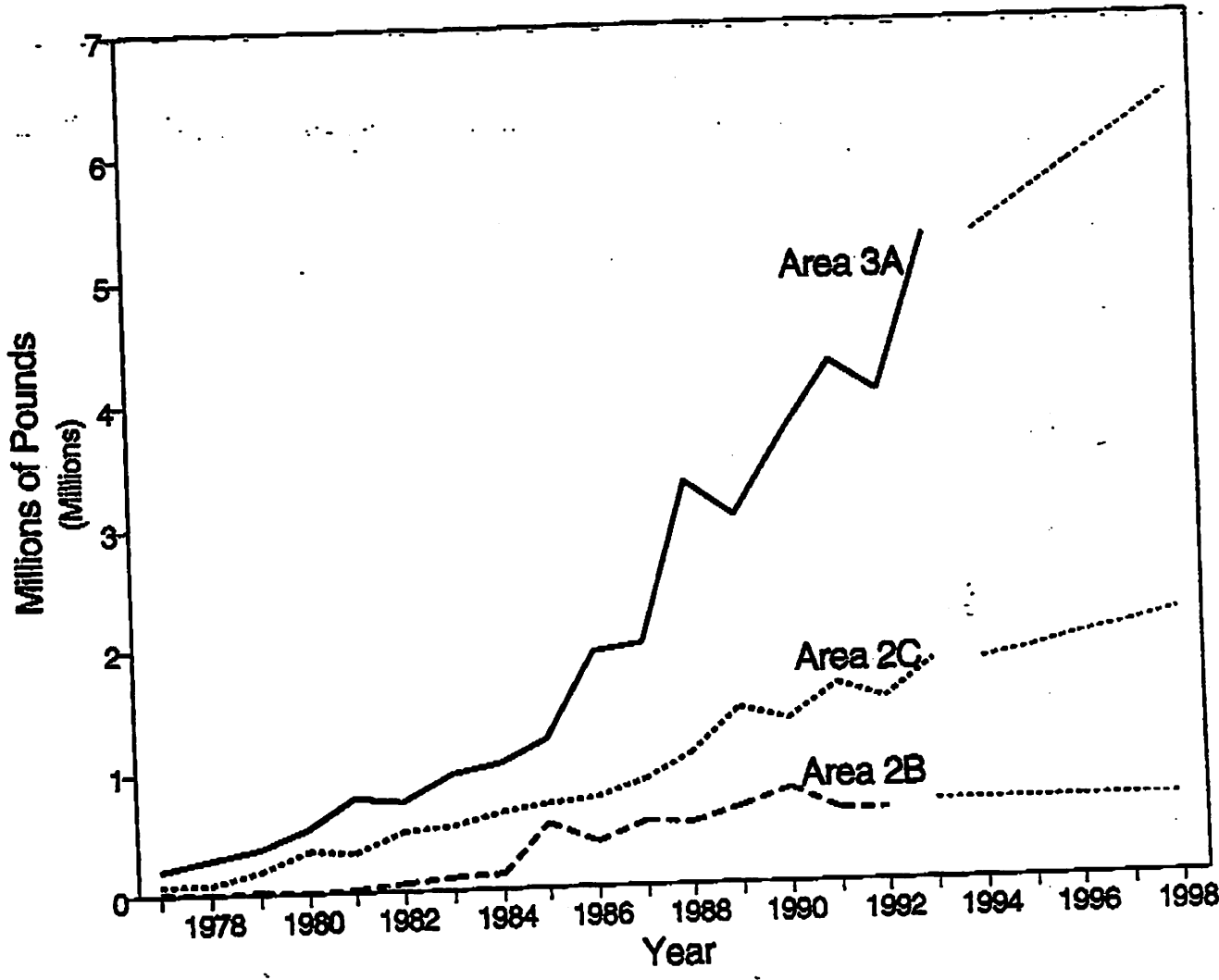
Region	Port	License Category	1989	1990	Year 1991	1992	1993	1994
		B		1	1			
	Cen Alaska (Misc)	C	1	2	1	1		1
		S						
	Cooper Landing	B						
		C			1			
		S	1	1	1	2	2	2
	Day Harbor	B			2	1		
		C						2
		S						
	Seward	B	27	28	34	33	32	32
		C	111	125	110	99	84	76
		S	21	24	34	31	29	42
	Totals	B	27	29	37	34	32	32
		C	112	127	112	100	84	79
		S	22	25	35	33	31	44

Region	Port	License Category	1989	1990	Year 1991	1992	1993	1994
	Kodiak	B	11	21	22	19	27	46
		C	457	492	504	442	379	363
		S	3	5	5	8	19	32
	Larsen Bay	B	1	1	1		2	4
		C	12	15	16	14	7	7
		S						
	Old Harbor	B			2	2	2	2
		C	16	17	21	18	15	17
		S						
	Ouzinkie	B						
		C	14	21	19	17	13	13
		S						1
	Port Bailey	B	1	1	1	1	1	1
		C	2	1	1	1	1	1
		S						
	Port Lions	B	3	3	3	7	7	8
		C	24	24	28	26	16	14
		S					2	4
	Port Williams	B						
		C						4
		S						
	Whale Pass	B					3	2
		C			2	3	1	1
		S				1	1	
	Others(6)	B	1	2	1			1
		C	7	10	14	12	9	7
		S						5
	Totals	B	16	27	29	28	41	63
		C	516	558	585	515	427	409
		S	3	5	5	9	22	41

Region	Port	License Category	1989	1990	Year 1991	1992	1993	1994
	Adiak	B	1	1	1	1	1	1
		C	10	10	9	9	3	
		S	1	1	2	1	1	1
	Dutch Harbor	B				1		
		C	8	11	14	14	12	4
		S			1			
	Mekoryuk	B		2	2	3	2	2
		C	9	98	51	26	28	25
		S				2		
	Naknek	B	1	1	1	1	1	1
		C	6	68	29	29	13	16
		S						1
	North Pole	B			1	1	1	
		C	1		1	2	1	1
		S						
	Sand Point	B			1	2	2	5
		C	81	81	101	97	92	89
		S					1	
	Togiak	B		1	2	2	2	2
		C	11	43	15	6	4	1
		S						
	Unalaska	B			1	1	1	5
		C	13	14	21	20	16	34
		S						
	Others(23)	B						4
		C	169	215	193	192	193	222
		S						
	Totals	B	3	6	10	13	11	21
		C	310	541	435	398	363	393
		S	1	1	3	3	2	2

Region	Port	License Category	1989	1990	Year 1991	1992	1993	1994
	Cordova	B	6	10	7	8	7	9
		C	92	173	220	167	115	99
		S	9	9	2	3	3	5
	Fairbanks	B		2	2	2	2	2
		C	5	10	8	6	4	4
		S	1	1	1		2	2
	Latouche	B						
		C						
		S					1	
	Valdez	B	25	43	46	40	37	41
		C	58	79	87	68	46	46
		S	8	6	9	13	16	20
	Whittier	B	5	9	10	7	6	12
		C	40	43	39	30	26	25
		S				2	3	7
	Yakutat	B	12	14	14	15	12	12
		C	42	48	65	62	41	35
		S	1	5	4	3	3	5
	Others(8)	B						
		C	11	16	15	19	13	11
		S						
	Totals	B	48	78	79	72	64	76
		C	248	369	434	352	245	220
		S	13	15	16	21	28	39





**Halibut Sport Harvest by Area, with Projections.**

**Table 3. Harvest by sport fishers (thousands of pounds) by area, 1989-1993.**

Area	1989	1990	1991	1992	1993 <sup>b</sup>
2A	327	197	158	250	246
2B	635	762	584	579	657
2C	1,559	1,330	1,654	1,668	1,811
3	3,005	3,638	4,236	3,899	5,265
4	24	40	74	40	72
<b>Total</b>	<b>5,550</b>	<b>5,967</b>	<b>6,706</b>	<b>6,436</b>	<b>8,051</b>

<sup>b</sup>Preliminary Estimates




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December 29, 1994

Richard B. Lauber, Chairman  
 North Pacific Fishery Management Council  
 Post Office Box 103136  
 Anchorage, Alaska 99510

Dear Rick:

I believe the Council made two errors at the December meeting in its haste to recommend a vessel moratorium that will be approved. The Council's December agenda and staff memo indicated that the moratorium issue would not be an action item.<sup>1</sup> The Council also neglected to rescind its September final action on the moratorium before voting on the new moratorium. I am writing because the Columbia, a fishing vessel owned by Trident, would be adversely impacted by the Council's December moratorium.

The Columbia was built as a crab vessel. In 1985 it was converted to a trawl vessel. In the spring of 1994, Trident spent approximately one hundred and fifty thousand dollars modifying the Columbia to be a combination crab/trawl vessel. (The vessel will deliver crab during the opilio fishery this winter and would have fished bairdi crab this fall except for the need to work on the main engine.) The Council's June 1992 recommended moratorium allowed "cross-overs" and, at the time Trident modified the Columbia to a crabber/trawler, I expected the 1992 moratorium would be approved. In any event, I could be confident the Columbia would be allowed to fish both crab and groundfish under any moratorium because the vessel has a large catch record in both fisheries.

In August of 1994 the 1992 moratorium was disapproved. At the September 1994 meeting the Council voted to restrict the qualifying years under a moratorium from 1988 through 1992, but cross-overs were permitted. In December the Council was scheduled to receive a status report from the National Marine Fisheries Service on the progress of its September moratorium recommendation. The moratorium issue was presented to the Council on Sunday morning and, in addition to receiving a status report, a motion was made to restrict cross-overs (while maintaining the more narrow restriction on qualifying years).

Active public participation is an important benefit of the council process, especially when a council has given indications it is taking one direction and then changes course. This issue is unique because of length of time between the Council's 1992 moratorium recommendation and its eventual disapproval by the Secretary. Obviously, Trident spent a large sum of money based on the Council's 1992 moratorium. Had we even known that the Council was considering voting to restrict cross-overs at the December meeting we

<sup>1</sup> The Staff Memorandum and the Council agenda indicate that the Council may "comment on proposed rule for revised [September] moratorium", not vote to recommend an entirely new moratorium.

Alaska

★ The American Connection

Washington

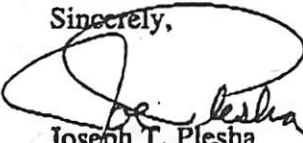
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Richard B. Lauber  
December 29, 1994  
Page Number 2

could have foregone work on the Columbia's main engine and instead fished crab with the vessel.

I do not know if there are others which share my concerns over the Council's December moratorium action, however, I respectfully request that the Council schedule the moratorium issue for final action so that public will be noticed and can give full comment to the Council on how it may be impacted by the proposed action.

Sincerely,

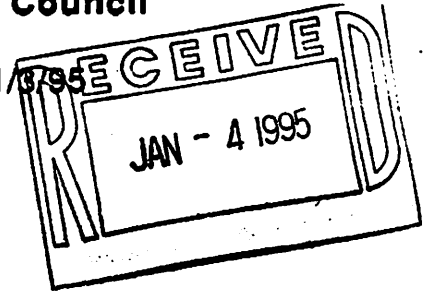


Joseph T. Plesha  
General Counsel

**HALIBUT MANAGEMENT PROPOSAL**  
**North Pacific Fishery Management Council**

**Name of Proposer:** Kathy O'Gara  
**Address:** P.O. Box 3047  
Sitka, AK 99835  
**Phone:** (907) 747-8710

**Date:** 1/3/95



**Brief Statement of Proposal:**

This proposal requests the Council to initiate Regulatory Amendments which:

1) **Sub-divide the Alaskan sport halibut fishery into "guided sport" and "non-guided sport" fisheries. Lodges and other "out-fitters" would be included in the guided sport category**  
2) **Sub-divides IPHC management areas 2C, 3A and 3B into the following zones for guided sport management purposes (see attached maps) [note: referenced areas are based on ADF&G sport fish statistical areas as described in "Harvest, Catch, and Participation in Alaska Sport Fisheries During 1993." ADF&G. Mills, Michael J.. September 1994.]**

- \* **Zone 1, Southeast: ADF&G areas A,B,C,D,E,F,G, and H.**
- \* **Zone 2, Prince William Sound: ADF&G area J.**
- \* **Zone 3, Cook Inlet/Kenai: ADF&G areas K,L,N and P**
- \* **Zone 4, Kodiak: ADF&G area Q**
- \* **Zone 5, Alaska Peninsula: ADF&G area R**
- \* **Zone 6, Bering Sea,:ADF&G areas T, U, V W X, Y and Z**

3) **Places an annual cap, expressed as a percentage of the harvestable surplus available to the commercial fishery, on the guided sport halibut fishery in each zone as follows:**

- Zone 1--120% of '94 guided sport harvest.**
- Zone 2--120% of '94 guided sport harvest**
- Zone 3--120% of '94 guided sport harvest**
- Zone 4--120% of '94 guided sport harvest**
- Zone 5--No limit**
- Zone 6--No limit**

**Objectives of Proposal: (What is the problem?)**

The guided sport halibut fishery in Alaska is currently unconstrained by quotas. The catch of halibut taken by charter operators and outfitters has increased dramatically in recent years. Since the Alaskan halibut resource is fully utilized, this increase has resulted in localized depletion, impacted traditional sport and subsistence halibut fishermen, reduced community stability, and, eroded the historic commercial fisheries.

Additional growth in the guided sport industry is predicted. This growth will exacerbate these problems and increase the attendant social and economic

impacts on historic users. The objective of this Regulatory Amendment is to minimize the impact of the rapidly developing guided sport halibut industry on traditional sport, subsistence and commercial halibut fishermen.

**Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)**

The North Pacific Fishery Management Council is the management body authorized to make allocative decisions affecting the Alaskan halibut fisheries.

**Foreseeable Impacts of Proposal: (who wins, who loses?)**

As stated above, this Regulatory Amendment will minimize the impact of the developing guided sport halibut industry on the traditional sport, subsistence, and commercial fisheries in Alaska. The guided sport halibut operators and outfitters may suffer some economic impacts until measures are implemented to limit growth of this industry. However, the possible negative impacts to the overall halibut sport fishery are mitigated by applying the cap only to the guided sport industry, and by setting the cap at a higher level of harvest than is currently taken.

**Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem.**

1) Capping all sport halibut fisheries: A cap on the recreational sport halibut fishery unnecessary provided growth in the guided sport halibut fishery is constrained.

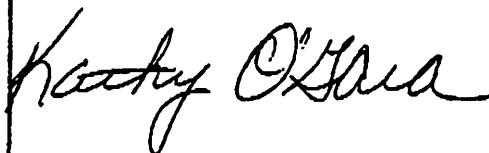
2) A moratorium on the guided sport halibut fishery: A moratorium will not address the developing problems of localized depletion nor economic overfishing which impacts traditional users. Additionally a moratorium will not provide any meaningful protection against the pre-emption of commercial fisheries.

**Supportive Data & Other Information: What data are available and where can they be found?**

The International Pacific Halibut Commission has data documenting the increase in the sport halibut catch. The State of Alaska and ADF&G has data on the growth of the guided sport industry.

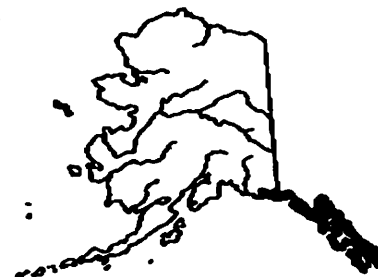
Signature:

Kathy O'Gara

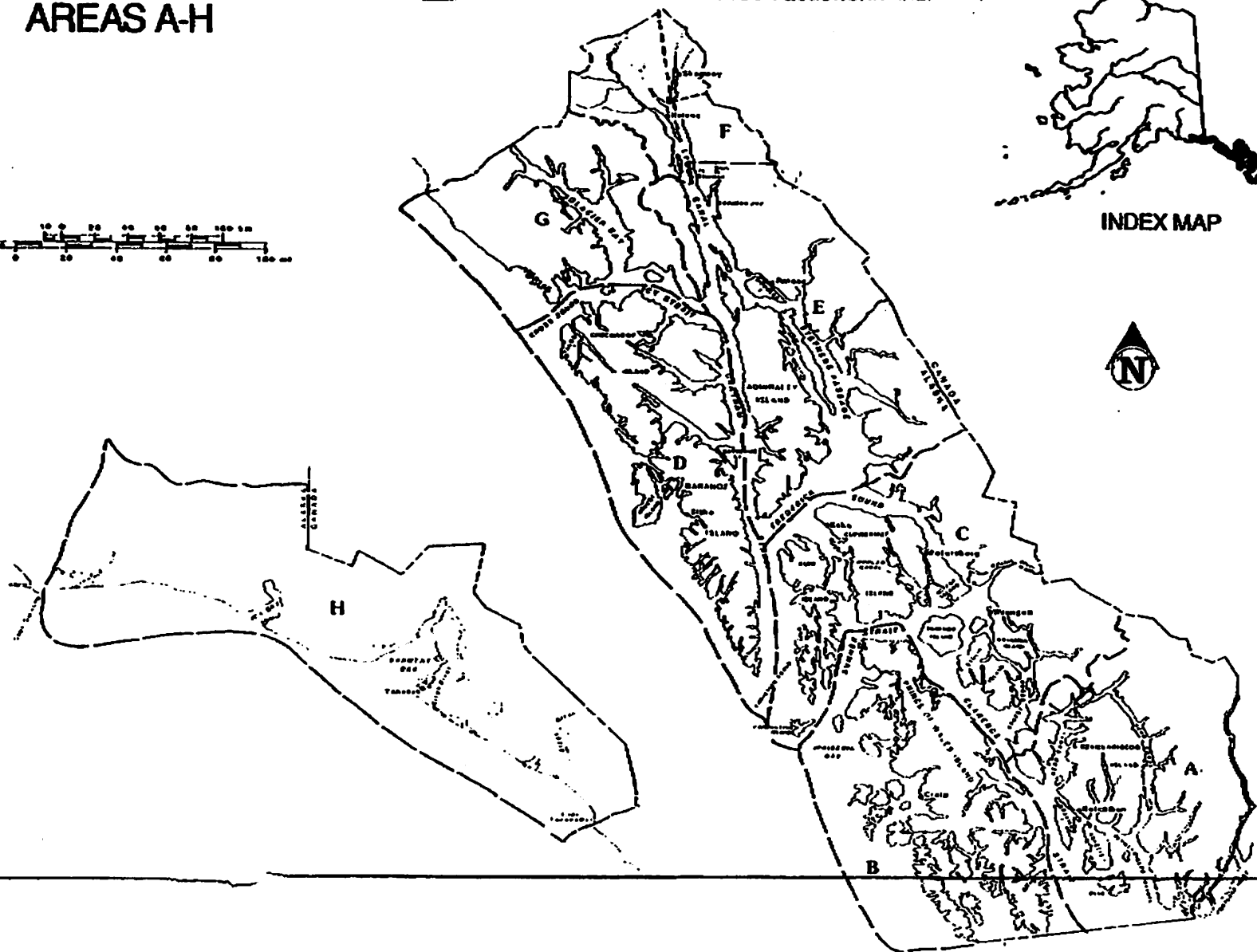
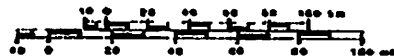


# AREAS A-H

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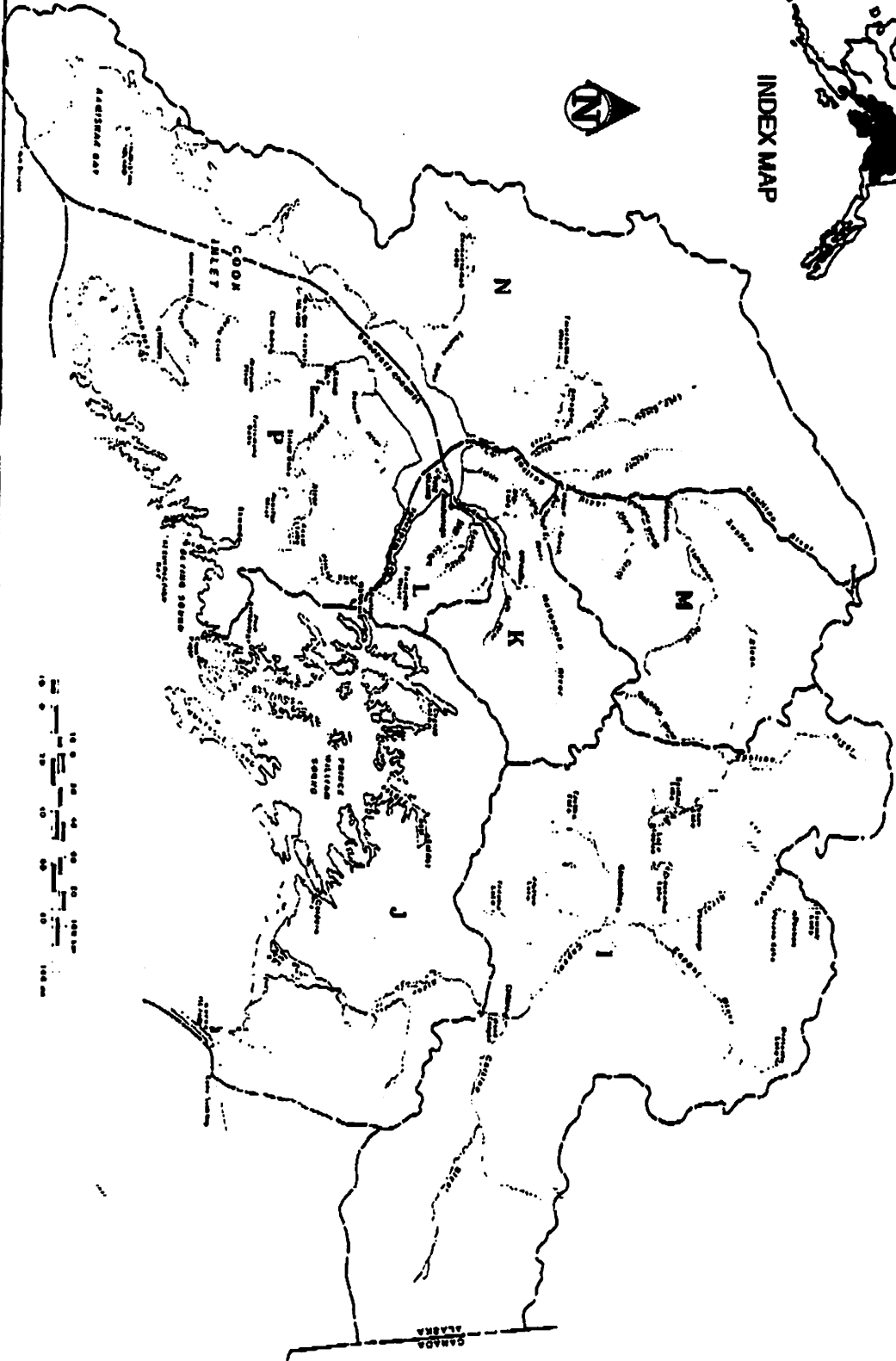
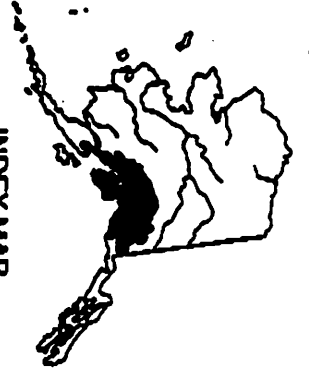
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# AREAS I-P

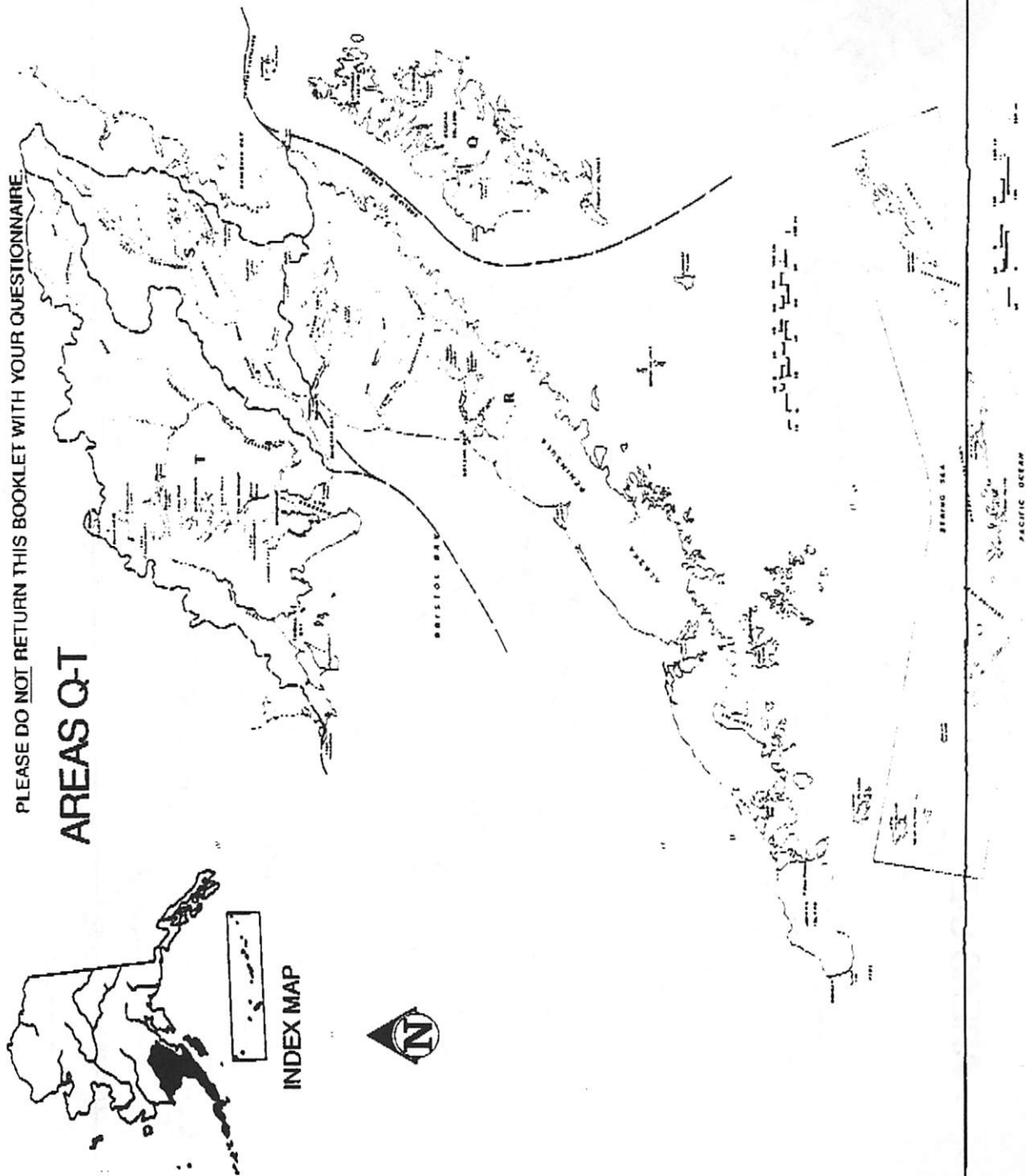
INDEX MAP





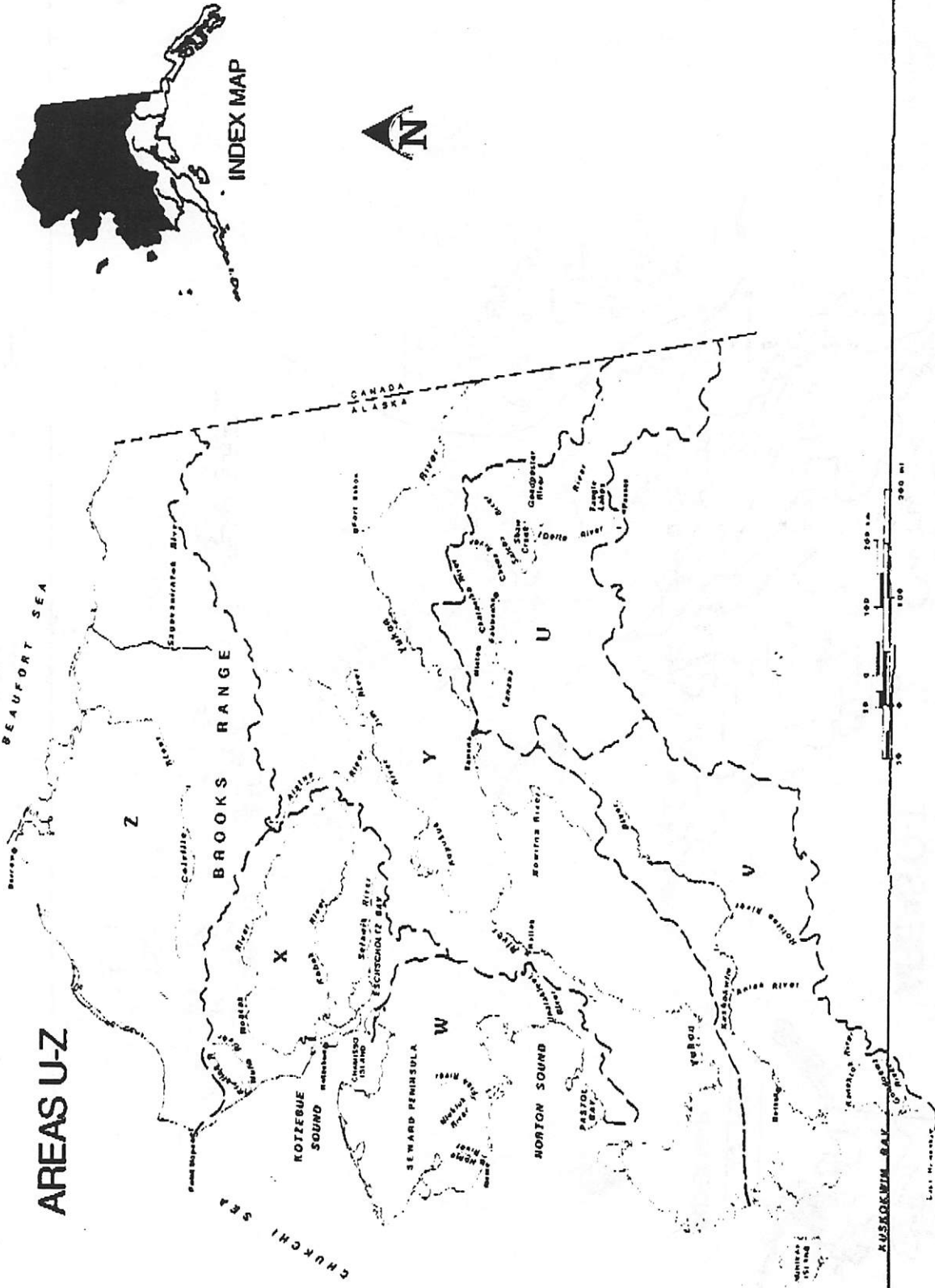
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# AREAS Q-T

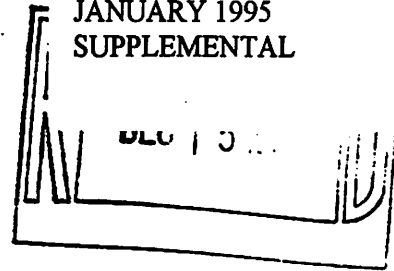


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# AREAS U-Z



AGENDA C-1  
JANUARY 1995  
SUPPLEMENTAL



Matt Langdon  
P.O. Box 635  
Castle Rock, WA 98611

December 7, 1994

Mr. Richard Lauber  
National Marine Fishery Council  
P.O. Box 103136  
Anchorage, AK 99510

Dear Mr. Lauber:

I am a commercial fisherman from Petersberg, Alaska. I have been fishing there for the past four years. I am concerned with our Halibut Fisheries, due to the Charter Boat Industry. I would like to see them have to keep a log book of their daily catch and I also would like to see a size limit of at least 32". What I am asking is if you would help protect everyone's fisheries for the future.

Thank you,

*Matt Langdon*

Matt Langdon

Ronald P. McClain  
P.O. Box 66  
Sitka, AK 99835

Dec. 12, 1994

Rick Lauber, Chair, NPFMC  
P.O. Box 103136  
Anchorage, AK 99510

Dear Mr. Lauber:

I am writing this letter to express my concern about the declining Halibut stocks in the area around Sitka.

I am a sport fisherman as well as a retailer of sporting goods in Sitka. It is apparent both in my personal experience and from listening to hundreds of sport and subsistence users that the number and size of Halibut have sharply diminished.

The primary reason for the decrease in stocks for the Sitka area seems to be tied to the growing Charter Boat fishing fleet.

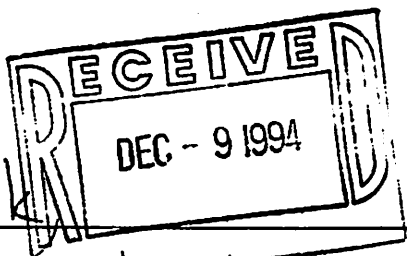
I strongly recommend that the Halibut bag limit be reduced to 1 fish per day for Southeastern Alaska. I think this is the only way we can turn this decline around.

Sincerely,

*Ron McClain*

Ron McClain

YUC -  
Respon



Rick

William Connor  
Box 1124  
Petersburg Ak  
99833

I am deeply concerned with the explosive growth in the Halibut charter industry.

Being a longtime resident of Alaska and involved in the commercial Halibut fisheries since the early 70s. I watched the demise of the fisheries by the expansion of the commercial fleet from 5 months to 2 days. Since the late 80s I've watched the charter fleet both westward and especially southeast grow to tremendous size. Southeast is now infested with individual charter vessels, landbased lodges, floating lodges and traveling lodges. With the advent of 1 King Salmon a day, Halibut has become a major target of these fleets and lodges.

In conversation this summer with a charter skipper, he stated it was a great month for Halibut with some 300 fish to date for clients. This was just June! I was flabbergasted. All these fish for a 6 cabin lodge located in Petersburg. There are now three in Petersburg with more planned. I believe the number for just lodges is around 40. It is common knowledge that the Halibut from late June to the 1st part of September move into the shallows and availability for charter operators increase.

substantially. I know of one charter boat owner operator who has commented about the explosion of new lodges and charter vessels onto the traditional grounds for Halibut, comparing it to booby 10 off the Columbia river.

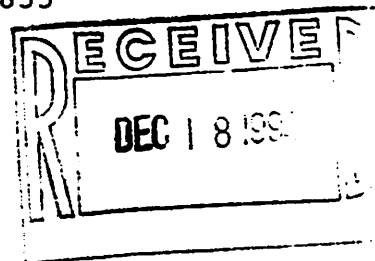
My concern is this new Commercial industry is totally unchecked and unregulated. No one knows for sure what is being harvested. For speculation purpose 40 lodges at 10 fish a day at 25 lb avg? How about the skipped charter vessels take? I've talked with a number of charter skippers who have never been surveyed.

My belief is the Dept. of fish and game does not have a handle on what is being harvested. Dungeness crab fisheries is a good example. In 1983 there were 13 of us in Southeast harvesting. We asked for a moratorium, we were denied, and told there is not a problem. The fishery has since been destroyed. And there were on thimbles of oyster monitor.

We need aggressive action now! Commercial Longline fishermen are required to log the fish they catch and take home. We need to require at least, from this new Commercial industry, with all their hi-tech gear, to do the simple task of logging their catch accurately. If this is not done, we have a catastrophe waiting to happen.

Sincerely, William

Robert Younger  
311 Peterson Ave.  
Sitka, AK 99835  
907-747-6965



Chairman Richard Lauber  
N.P.F.M.C.  
P. O. Box 103136  
Anchorage, AK 99510

December 13, 1994

Dear Chairman Lauber:

I am a commercial and sometimes sport Halibut fisherman. I am concerned about the recent growth of the Halibut Charter industry. Here in Sitka this recent surge of charter businesses has been apparent. New lodges are springing up, new charter vessels are filling the harbors and an ever increasing volume of fish boxes are hitting the airport. I have heard repeatedly from subsistence fishermen that it is getting hard to catch a Halibut for dinner anywhere near town.

Charter Skippers are fishing every day. They know right where to go (or where not to go), and what bait has been working. The guided charters are not just selling a ride to the grounds. They are also selling their fish catching ability which increases with repeated fishing effort.

I believe the charter boats expertise they are selling separates them from the un-guided sportsman. This is supported by the higher catch rates posted for guided charters. A charter business's success is determined by the number of clients they take out. This success directly relates to the number of Halibut taken.

Unfortunately, as more charter businesses form and expand, established commercial and subsistence fisherman are being slowly displaced.

The history of guided sports fisheries consuming quotas should be proof enough that charter businesses are a commercial enterprise.

I think the separation of guided and un-guided sportsman is critical to the future management of the fully utilized Halibut resource.

I understand the need for charter business to meet advanced bookings. It is for this reason I think capping the guided sport segment at the current estimated catch of 3.5 million pounds may be too restrictive.

I believe that a moratorium on new entrants is the best way to get a handle on the growing charter fleet. Limited entry won't stop the growth of the guided fleet. But it will at least slow the flood of new entrants. Existing operations won't be restricted in the making of advanced bookings.

There has also been some support for a moratorium from some segments of the charter fleet.

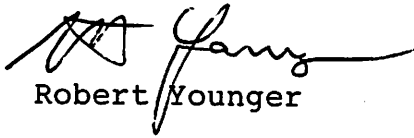
I hope the Council will aggressively pursue this issue in January.

I fear that the continued unregulated harvest privileges will lure even more charter business to profit from our Halibut resource.

With Halibut stocks on the decline, the localized overfishing and displacement of historic users is sure to escalate.

Thank you for considering my concerns.

Sincerely,



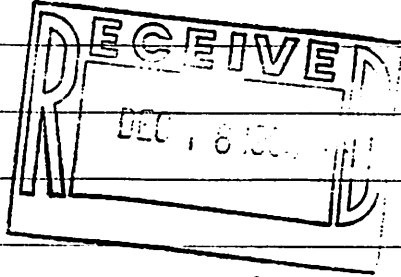
Robert Younger



Chairman Richard Hauber  
NPFMC

Dec 15, 1994

P.O. Box 103134  
Anchorage, AK 99510



Dear Chairman Hauber,

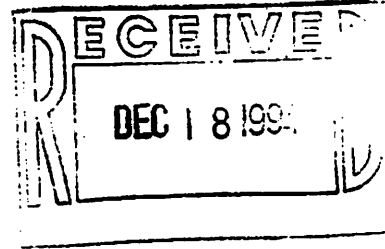
I believe that the separation of guided and unguided sportsmen is critical to the sustained yield management of the fully utilized halibut resource. I urge you to pass a moratorium on new entrants into the sports fishing charter business, effective Jan. 1, 1995, as the only way to get a handle on the growing charter fleet with the outlook toward a restricted access management program for charterboats such as in effect now for commercial halibut fishery. IFQ.

This last two years I have also observed a heinous waste of salmon halibut and rockfish by charter operators. <sup>near in Sitka</sup> Their method of filleting only the choicest part of salmon and halibut for their mostly non-resident clients and discarding a significant portion of the catch constitutes a dirty fishery that percentage wise approaches the factory trawl industry. Similarly rockfish are frequently neglected until they sour, then discarded. I observed a 30 gallon barrel of all species of rockfish in the round, spoiled left by two out-of-state seasonal charter operators who were gone out again with clients catching more. I brought this to the attention of the Protection Agent but no citation was given. The spoiled fish in this barrel would have fed my family for the entire winter.

(This was on about Aug 28, 1994)

Sincerely,  
Bon Mitchell  
128 Davrin  
Sitka, AK 99835

cc-Younger  
cc-Steter Charters



Chairman Richard Lauber  
North Pacific Fishery Council  
P O Box 103136  
Anchorage, Alaska 99510

December 15, 1994

Dear Chairman Lauber:

I writing in regards to the seriously negative effect which the rapidly expanding Charter fleet in Southeast Alaska is having on the traditional subsistence and recreational fishermen, or for that matter the commercial fishermen as well.

It is past time for the council to adopt restrictive management methods which will limit the growth and impact of this new fishing group. It is nothing short of unbelievable that all of the agencies which were put in a position to manage these resources fail to recognize, or more accurately, have failed to respond to recent developments in the charter fishery. The charter fishery is not only out of control, the management has no control. It began with the charter boat operators being able to individually sell licenses to their clients. It continued with the operators and their deckhands being able to retain fish for themselves (or their clients).

This group targets near shore habitat which are the same areas available to local subsistence and recreational fishermen. It is not hard to understand why halibut and lingcod in Sitka Sound have become increasingly difficult to catch. The effect of reduced availability in the sound has forced charter vessels and subsistence and recreational fishermen alike to travel farther from town in search of more productive areas. The effect on the quota Chinook fishery has limited the use of downriggers and the daily catch and possession limits. Lets address the problem. Do the math. Last year there were 77 charter operators registered in Sitka. Approximately 40 of those were active. Lets say a two month period (60 days) each vessel takes 6 clients fishing, 14,400 fishermen. Typically they will start with salmon, 2 fish (chinook or otherwise), then switch to halibut (2 fish) and finish with lingcod (1 fish). The result would be something like 29,000 salmon, 29,000 halibut and 14,000 lingcod. These numbers are conservative and the fact is nobody knows for sure how many fish are being taken. It doesn't take a blind man with a cane to figure out where this is headed.

Although this increasing fleet may not be a concern for the resource as a whole, I can assure you that the effects are very obvious to those of us who once took our children out to the local hole for a morning of fishing and recreation.

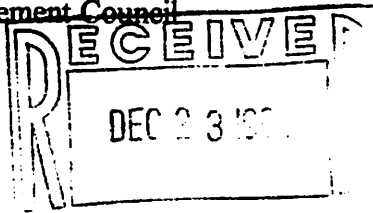
Thank you for listening and taking action now.

Sincerely and Respectfully,

A handwritten signature in dark ink, appearing to read "Craig S. Stewart". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chairman Richard Lauber  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, Ak 99510

12/17/94  
Scott Landis  
F/V Middlepoint  
837 N. Jac Mill rd.  
P.T., Wa. 98368



Dear Chairman Lauber,

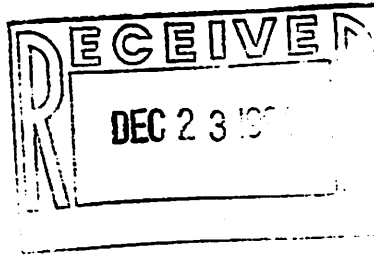
For the past twenty years I have been fishing halibut commercially and thirteen of those years halibut was my primary source of income. Living in Port Alexander, Ak. for those years would have been very difficult without the resource. I have sacrificed over the years for a lack of control of new entrants in the fishery watching the seasons become what they are today a series of derbies. Thank god that is ending. Thanks for your efforts in instituting the IFQ program. But now we have another potential menace in the works. The charter boat fleet. I can not believe the transformation in just the past three years. The CBs are everywhere catching immensely more than is indicated.

The council did a fine job with the IFQ system preserving the small boat character of the fleet etc. but now that is really threatened with the CB activity. They fish the same grounds that I traditionally fished as a start-up skiff fisherman. I was fortunate during the 70's to not have this type of competition. I would not have survived. The grounds have to breathe occasionally without the constant effort. As commercial fishermen we are aware of who is fishing where and when and make our decisions where to fish accordingly. The charter boaters are constantly hammering the good traditional grounds close to the communities essentially displacing the day-boat community oriented commercial fleet.

Please take immediate action to curtail this burgeoning charter boat fleet and preserve the traditional halibut grounds for the people in the small coastal communities who depend upon this resource. You folks did a fine job preserving the traditional qualities of the halibut fishery. Please keep your focus.

Thanks for your hard work,

  
Scott Landis



December 20, 1994

Chairman Richard Lauber  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

Dear Chairman Lauber:

I have been halibut sport fishing in the areas surrounding Juneau and Sitka for the past 10 years and am concerned about the impact the halibut charter fleet is having on the halibut stocks.

Halibut have been harvested by subsistence, sport, and commercial fishermen in a regulated manner for many years and I believe it prudent to extend that regulation and control to the halibut charter fleet. While the fleet operators may claim that they are merely marine taxis transporting sportfishers to fishing areas, they are overlooking the fact that volume is volume regardless of which sector is harvesting the resource. I can appreciate the charter operators position on regulation of their industry, however, a **sustainable** resource is vital to all participants in this fishery and there is simply not enough information about the species or the actual harvest numbers to allow the current harvest to continue. Please do not be influenced by the greed and short sightedness of the vocal few who may not truly have the best interest of the resource and fellow user groups in mind.

In conclusion, I would like to urge the Council to work toward developing a management program for the halibut charter fleet for the upcoming 1995 charter fishing season.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eric F. Bjella". The ink is dark and the signature is fluid.

Eric F. Bjella

RECEIVED  
DEC 17 1994

310 Marine Street  
Sitka, Alaska 99835  
December 19, 1994

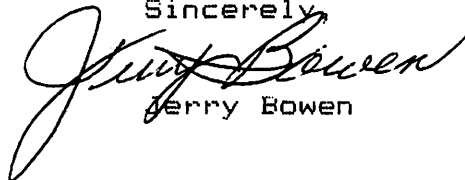
Dear Chairman Lauber,

I am a sports fisherman from Sitka. I am becoming increasingly concerned with the amount of halibut that the charter fleet is taking from the waters adjacent to Sitka. My family, including grown children and grandchildren, have been sport fishing for halibut in our area for over twenty years. During the last several years, the charter fleet has really expanded here. Places you could always count on for a fish or two have been fished out do to the constant pressure from these boats. Those with four hour trips from the cruise ships saturate the near-by waters while those with day charters fish locally or travel to distant areas. You cannot escape the pressure even on over night trips!

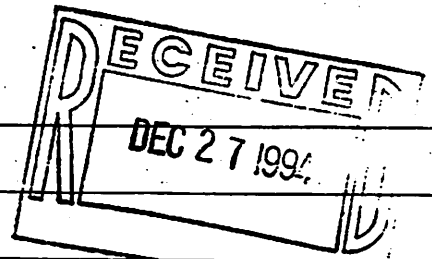
We sport fished when commercial seasons ran the entire summer. The abundance and conflict was not what it is today from the charter fleet. My understanding is that there is going to be some deliberation during your January meeting about the charter fleet. You need to regulate their numbers through quotas or limited entry. What used to be a resource that benefitted all has turned into a resource that benefits a comparatively few.

Your attention to this problem will be appreciated.

Sincerely,

  
Jerry Bowen

CHAIRMAN RICHARD LAUBER.  
North Pacific Fishery Management  
P.O. Box 103136  
Anchorage AK 99510.



DEAR CHAIRMAN LAUBER

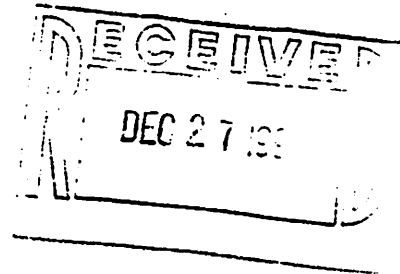
I Am a commercial Fisherman. The Halibut Charter fleet is rapidly expanding. For 7yrs the Halibut fishery has made 1/3 of my income. With IFQ's I might receive a \$7,000 quota, If this is decreased by an ever increasing charter fishery, this would hurt deeply, or could put me out of business. I would like to purchase another \$10,000 quota, but without a set % or amount the charter fishery is taking, this purchase looks unjustifiable. It seems with the change over to IFQ's it is now time to put everything in Black & White, the resource can be managed properly and Fishermen can make a realistic business plan.

I think the charter fleet should be treated fairly, but not allowed unrestricted growth. They should receive a quota based on past % of catch. Each charter boat should receive a punch card. If they need more fish let them purchase it just as I have to do. Charter fish are supposed to be worth many times more than commercial fish, so it wouldn't be any problem for them to purchase all they need. Unrestricted growth of the charter fleet will put 100's of small full time fishermen and families at risk in SE. Alaska. - Thanks for your attention to the serious issue.

Sincerely,  
Ken Bare

Ken BARE  
P.O. Box 6209  
Sitka AK 99835

Mr. Richard Lauber  
Chairman, NPFMC  
PO Box 103136  
Anchorage, AK 99510



12/20/94

Dear Mr. Lauber

I am writing in concern over the increase in charter operations targeting halibut in the Sitka area. I have lived and fished in Sitka for only three years, but two things have been readily apparent. With each passing year it gets harder and harder to catch a halibut in any of the traditional sport fishing/subsistence spots, and at the same time, bigger and fancier new charter boats are operating out of our harbors.

I keep my skiff in Crescent Harbor, and I see charter boats coming back with their catch, every day, several times a day, all throughout the season. These people are not out there practicing "catch and release", and I see their crews routinely filleting fish as small as 5-8 lbs.

There is no question in my mind that this is a commercial business, and that these skippers are taking meat off the tables of local residents and selling it to people from outside. These operations should be regulated the same as any other commercial fishery, with, at the very least, limited entry, and they should not be allowed to raid areas traditionally used for local subsistence.

Sincerely,

A handwritten signature in cursive script that reads "Cliff Tincher". The signature is written in dark ink and is positioned above the typed name.

Cliff Tincher  
202 Observatory Street  
Sitka AK 99835

North Pacific Fishery Management Council

DEC 27 1981

Dear Chairman Lauber,

I've been a commercial halibut fisherman in Alaska for 20 years. I'm concerned about the effect the growing charter fleet will have if they are left to expand with little or no restrictions.

I've read some projections by the IPHC and the ADF+G. They say the current sport catch rate is 20% of the commercial catch. It may reach 35-50% by the end of the decade, mainly due to the increased charter catch.

As you can plainly see this is not going to make the commercial halibut fishermen happy.

Commercial halibut fishermen have worked for years with the NPFMC to develop the IFQ system. Now that we're under IFQ's we aren't going to sit and watch our halibut quotas diminish year after year, as the charter catch increases.

Limiting the growth of the charter fleet will prevent traditional commercial sport & subsistence users from being displaced. Please take steps to deal with this problem at your Jan meeting.

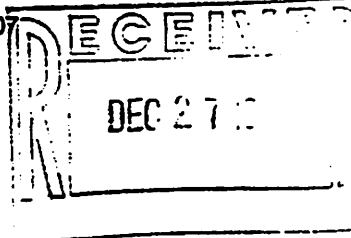
Sincerely, Marty Remind  
Box 8147  
Port Alexander, AK  
99836





## KAKE TRIBAL CORPORATION

P.O. Box 263 • Kake, AK 99830 • (907) 785-3221 • Fax: (907) 785-6407



12/21/94

Mr. Richard Lauber, Chairman  
North Pacific Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

Dear Mr. Lauber:

Kake Tribal Corporation is proud of our developing Fisheries Division which produced about 6.7 million pounds of salmon, black cod, and halibut in 1994. Despite the Individual Fisherman Quota implementation in 1995, halibut and black cod remain an important portion of our production.

We are especially concerned about the Halibut Charter situation in Alaska. We have been monitoring the fishery and have completed research on it. We find that:

- (1) Halibut Charter boats amount to at least 20% of the quota according to the Alaska Department of Fish and Game.
- (2) Halibut Charter boats do not have to report their catches to the Alaska Department of Fish and Game. The 20% catch estimate is exactly that - an estimate. That's all the charter boats provide. They do not have to report real landings.
- (3) Halibut Charter boats accounted for only 4% of the catch 10 years ago. If the trend continues, particularly with no accountability of catch, they may very well represent up to 50% of the quota in ten years.

With this bit of research, the impact, if it is not addressed could be devastating to the fishermen. Lots of us were very concerned about the implementation of IFQ's in 1995 but a sleeper in this whole formula is the Halibut Charter boats. We strongly recommend council address an effective management program for the Halibut Charter fleet. Your immediate action is recommended.

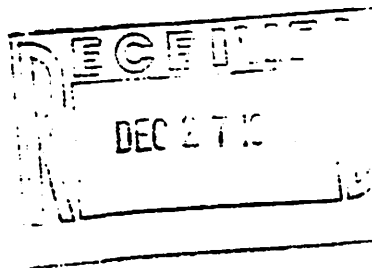
My very best wishes.

Sincerely,

*Gordon Jackson*

Gordon Jackson/President/CEO  
Kake Tribal Corporation

cc: SEAPA Members  
The Honorable Tony Knowles, Governor, State of Alaska  
AFN



Box 1367  
Sitka, Alaska 99835  
December 19, 1994

Richard Lauber, Chairman  
NPFMC

Dear Chairman Lauber:

I am writing concerning the growth of the halibut charter fleet and the resultant detrimental effect it is having on the traditional sport and commercial fisheries. I am both a commercial and sport user of the halibut resource. This past year I commercial fished the June 20 opener and sport fished eleven days.

My concern with the charter catch as it pertains to the commercial fishery is that under the present regulations, the expected sport catch is subtracted from the the total allowable catch for an area and what is left is provided to the commercial fleet. The commercial portion of the catch is on a steep decline. This decline is almost all attributable to the growth of the charter industry—a new industry that uses the halibut resource for commercial gain. Some type of curb needs to be placed on this industry in order to preserve the traditional uses and to preserve the economical viability of the commercial fleet and the communities that have traditionally relied on this resource for income. We need a limited entry type system or a catch quota for the charter fleet.

Under the adopted IFQ program for halibut, the value of shares would continue to decline as the commercial quota for an area is eroded by the increasing charter catch. We all need to be on a level playing field if we are all going to be realizing monetary gain from the resource. Commercial fleets in Alaska will be paying 5.3% of their halibut gross next year to the state and federal government. There is a request in federal legislation for an additional 4%. There may be some justification to some of these assessments if the users are benefiting from the resource where others are not. Presently the only users to pay for the use of the resource are the commercial fleet. Lets put all of us with a profit interest in the fishery on the same regulatory taxation program and the same or similar quota system.

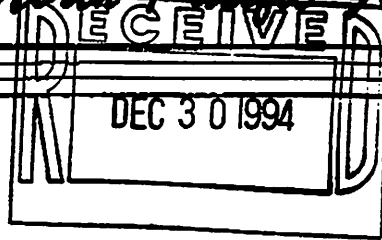
As a sport fisherman-I caught my first halibut near Sitka in 1966-I have seen a large influx of charter boats into our area in the past ten years. These boats have expanded from the traditional halibut sport fish grounds of Sitka Sound to the outside coast of Kruzof Island and through-out the inside waters of our area within a 50 mile radius. They have depleted the available stocks in the vicinity of Sitka to where it has become very difficult for the true sport fisherman to put fish in the freezer for his family. Since they have the advantage of being on the water almost every day and communicate with each other as to fish abundance areas, the charter fleet is taking a large amount of the sport catch. While doing this, they are usurping the catch of the average sports user. We need some controls over this group and some separation of this group from the regular sports person.

I have attended the IFHC regulatory meetings in January for the past three years and have seen the continuous erosion of the resource in the lower 48 from commercial to sports charter use. The fish are still being caught, the money from the resource is simply going into different pockets. We have the opportunity to control this reappropriation in Alaska. Lets do something about it before it is too late.

Thank you for your consideration.

Sincerely,

  
Robert D. Schell

*North Pacific Fisheries Association, Inc.*

HEADQUARTERS:

BOX 796 • HOMER ALASKA 99603

TO : North Pacific Fisheries Management Council

RE : Halibut Sport Charter Issue

DATE : December 30, 1994

The North Pacific Fisheries Association is already on record as stated in letter to the NPFMC dated May 16th, 1993 in favor of a moratorium for new entrants into the Sport Charter industry. We would at this time wish to reiterate our position and speak in favor of the proposal made by the Halibut Charter Associations of Alaska.

NPFA is a multi-gear user group based out of Homer, Alaska and represents commercial fishermen in south central Alaska. We are sensitive to the problems surrounding the charter industry and are all too familiar with unlimited growth in any fishing enterprise.

We support the use of control date 9/23/93 set by the NPFMC and encourage the NPFMC to; "establish a solid base of information with respect to regional catch rates and regional participation..." as stated in the charter associations' proposal.

We would like to add to the NPFMC of considerations several items of importance when developing a limited entry plan.

1.) We believe that for the protection of the participants and to inhibit further expansion, regional zones be incorporated into the moratorium. That no transfer of permits be allowed from one regional zone to another. If transfer were allowed to take place, bonafide qualifiers, who may have been merely speculative in nature, may inadvertently alter existing stability in the fishery, both biologically and economically.

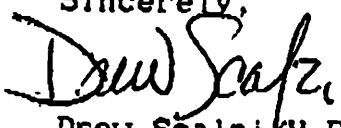
2.) We feel very strongly that vessel licenses be fixed during the moratorium. This is to say that a "six pack" remain a "six pack" and not be allowed to become a twelve or twenty-four pack. Only after sufficient economic study during the moratorium period may upgrading be addressed, if deemed appropriate.

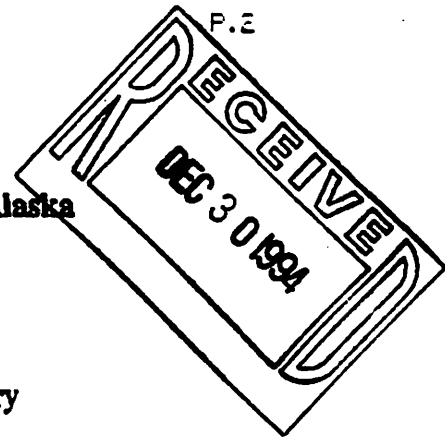
3.) During the moratorium period we feel that the sport charter industry is the best entity to address all the concerns that relate to unchecked growth of their industry. NPFA has made strides to work with our local Homer Charter Association. We feel that during the course of implementing a license limitation program, it would be in the best interest of all parties to have representation by the commercial long line halibut fleet involved at some level. Good communication between user groups is always productive.

4.) There are many conflicting reasons why the sport charter fleet does not have the same distinction of being called a "commercial fishery", as does the traditional commercial longline fleet. There are however many similarities; both user groups depend on a public to purchase product and services, both user groups operate under a profit incentive, both are subject to local, state, and federal taxes, and both depend on a healthy resource.

For these reasons we would like to see a designation classifying the sport charter group as a "commercial venture." This is not a confrontational measure but one to help distinguish between one resource user group and another.

We appreciate your consideration of our continued support of a moratorium on the sport charter industry in the halibut sport fishery, as proposed by the Halibut Charter Associations of Alaska.

Sincerely,  
  
Drew Scalzi, V. Pres



**Sitka Tribe of Alaska - Tribal Government for Sitka, Alaska  
456 Katlian Street - Sitka, Alaska 99835**

**Tribal Council Resolution 94-44**

**Supporting the regulation of the halibut charter industry**

**WHEREAS,** The relationship between the Native people of Southeast Alaska and the resources of the land and sea is so close that an entire culture is reflected in the traditional laws passed on from generation to generation which mandate conservation and the perpetuation of subsistence resources.

**WHEREAS,** halibut, among other species of fish, is undeniably a customary and traditional food of the Alaska Native people in Southeast Alaska as evidenced by such ancient and ingenious inventions as the Alaska Native halibut hook.

**WHEREAS,** the subsistence living of Native people of Southeast Alaska is threatened by over harvesting, waste, and mismanagement of the land and sea resources and disregard for the governmental authority of the Tribe to manage these resources.

**WHEREAS,** the ever increasing levels of harvest by halibut charter industry is a prime example of the over harvesting, waste, and mismanagement of subsistence resources.

**WHEREAS,** the halibut charter industry purports to be "non-commercial" when it is obvious from the number of profitable business enterprises supporting the industry, the huge numbers of fish taken by the industry, and the eventual sale of much of the charter industry's halibut catch to commercial processors that the halibut charter industry is "commercial."

**WHEREAS,** this growth and lack of regulation of the halibut charter industry directly and adversely affects the halibut subsistence fishery by overcrowding traditional fishing sites and over-harvesting the halibut populations and will destroy the subsistence fishery if left unchecked.

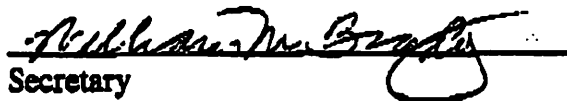
**NOW THEREFORE BE IT RESOLVED** that the Tribal Council of the Sitka Tribe recommends that the North Pacific Fishery Management Council adopt a management plan for the halibut charter fishery at the January 1995 meeting which 1) Classifies the charter fishery as a "commercial" fishery; 2) Sets a cap limit on the take by the halibut charter fishery that protects the subsistence fishery; 3) Adopt any other necessary rules, regulations, and restrictions to effectively manage the halibut charter fishery.

**CERTIFICATION**

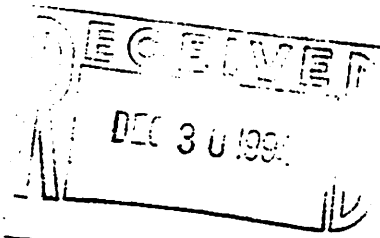
The foregoing resolution was adopted at a duly called and convened meeting of the council of the Sitka Tribe of Alaska held on December 21, 1994, at which a quorum was present, by a vote of 5 IN FAVOR, 0 AGAINST, and 4 ABSENT.

  
Chairman

Attest:

  
Secretary





12/27/94

Dear Mr. Lauber:

As participants in the SE halibut fishery for almost 20 yrs - as a modest family effort, we are writing to ask that serious consideration be given to restricting the Charter Fleets' harvest of the halibut resource.

Through those 20 yrs we saw the Commercial fleet explode into unmanageable numbers, we saw fishermen resist any restrictions (i.e. limited entry etc) until we had a critical problem that required a controversial solution i.e. IFQs. The same pattern seems to be developing in the Charter fleet - Tough decisions need to be made Now to avoid bigger problems between user groups and most important damage to a precious resource.

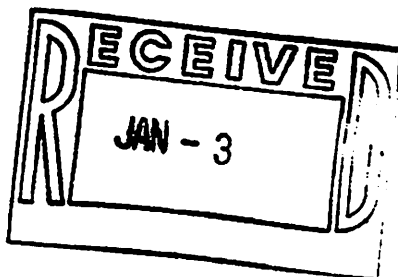
Sincerely,

Maie & Arny  
Johnson

423 Verstorjia  
Sitka AK 99835

Robert L. Swanson  
P.O. Box 924  
Petersburg, Ak 99833

Rick Lauber, Chair, NPFMC.  
P.O. Box 103136  
Anchorage, Ak. 99510



December 31, 1994

Dear Chairman Lauber,

I am a commercial fisherman and the longline fisheries are my main source of income. Continued decline in the halibut resource available to commercial fishermen will have a drastic effect on my family and those of my crewmen.

I do not believe any user group should be allowed to increase their share of the halibut stock at the expense of all others. In this day and age, unchecked expansion of resource use is not an option. The halibut stock is fully utilized, so all user groups have to be regulated and given a share of the quota.

If the charter fleet keeps expanding unchecked, soon they will be taking a majority of the quota at the expense of the resident commercial fishermen. I believe the Council has the opportunity and the obligation to act on this issue. Any delay will have an adverse effect on all user groups.

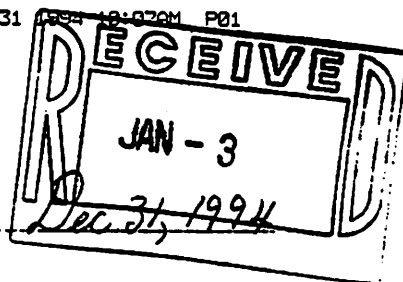
I personally feel the charter fleet is a commercial user of the halibut resource. As such, they should be given a percentage of the quota, be required to log all catch and bycatch, and become responsible users of their share of the halibut.

With the implementation of the IFQ system, the timing is right to deal with the charter issue. If the Council allocated the halibut stock to user groups at present levels, future allocation problems, and future user group conflicts will be avoided.

Thank you for the opportunity to express my views and wishes.

Sincerely,

Robert L. Swanson



Chairman Richard Lauer  
North Pacific Management Council  
P.O. Box 103136  
Anchorage, AK 99510

Dear Chairman Lauer,

I am a commercial fisherman and one of the species we target on is halibut. I would like the Council to address the issue of the halibut charter fleet.

The halibut charter fleet is taking a percentage of the halibut stock and charging people for the use of their services. It is my opinion that deriving an income from a fish stock makes over operation commercial and is distinctly different from subsistence or sport use. The charter fleet is not required to log their catch or their bycatch. I feel it would be impossible management in a time of declining halibut stocks to not recognize a group that is expanding unchecked.

I would urge the Council to recognize the Charter fleet as a commercial gear group, to enact a policy requiring operators to log their

catch and bycatch, and to give the  
charter fleet a percentage of the halibut  
quota based on their historical catch.

Thank you for the chance to comment.

Sincerely,

Brian Randall

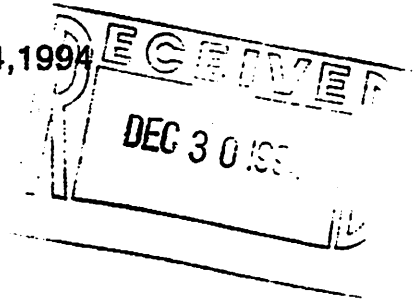
Box 1363

Petersburg, AK

99833

(907) 772-3430

Dec. 14, 1994



Chairman Rick Lauber  
North Pacific Fisheries Management Council  
P.O.Box 103136  
Anchorage, AK 99510

Dear Chairman Lauber,

I am both a sport and commercial halibut fisherman. I am also licensed as a charter boat operator. I am very concerned about the effects the rapidly growing halibut charter fleet is having on the commercial, sport, and subsistence fisheries. I urge the council to act immediately on this issue before it grows even farther out of hand.

I used to enjoy being able to go out in my small open skiff close by my home in Sitka and catch a halibut for my family to eat most any time, but any more it is too far to go to get beyond the local areas that have been fished out by the charter fleet. Have you watched a charter boat as it prepares to start fishing? What do you see? Do you see the client (i.e. the guided sportfisherman) out baiting up their hook and telling the charter boat operator where to go and what to do? NO! You see the charter operator handing the client a fishing pole all ready to go and instructing them just what to do. This is the big difference from the unguided sport fishermen or subsistence fisherman. This knowledge and equipment that the charter operator is using as a means to successful fishing trips for their clients directly equates to dollars. It is my opinion that the guided sport industry is just as commercial as the traditional halibut fleet and should be separated from the unguided sport fishermen.

It is also clearly unfair to the traditional halibut fleet. How does the Council think IFQs are ever going to work if you limit one commercial group (the traditional fleet) while allowing another commercial group (halibut charter) to grow unchecked at the expense of the first in an already fully utilized fishery?

Already there is antagonism and disagreements among the user groups which there never used to be prior to this huge growth in the charter businesses. This is only going to increase as the traditional halibut fleet starts fishing under IFQs and are out on the grounds more than 1-5 days a year and the charter fleet keeps expanding in leaps and bounds.

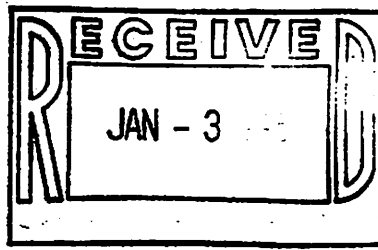
I would like the guided and unguided sport fishermen separated. I would like to see some limits put on the guided sport industry, whether it

be thru limited entry, a moratorium on new entrants, or a separate fixed quota. I think it is high time the guided sport industry had to fill out landing tickets just like the regular commercial fleet so as to get a honest look at their catch rates. If their growth is not affecting anyone as they claim then why is the council being asked to address this issue? If they are not growing then why is the number of fish boxes being transported out on the airlines from the guided sport industry greatly growing? Why are there new custom fish processing businesses complete with dockside pick-up services popping up?

If the Council does not address this problem immediately than they can rest assured that it will only come to the meeting tables with ever increasing problems until it is addressed. It would be nice to see the Council do something now, not after umpteen studies and meetings and the demise of the traditional 100+ year old halibut fleet, unguided sports fisherman, and subsistence users. I hope the Council sees fit to do so.

Sincerely,

Carolyn Nichols  
305 Islander Drive  
Sitka, Ak 99835



Dec 21 1994

Dear Sirs:

As a 25 year resident of the state of Alaska and a crew member on a number of longliners, I'd like to address the issue of sports fishing charters.

I don't have all the facts that are available to you in front of me now, so am speaking from personal observation. In our community of Petersburg I've seen the number of these individuals grow from a couple to over 20 in the last 10 years and the number of lodges in remote areas surrounding Petersburg rise steadily also.

My concerns are both for the conservation of stocks and an occupation that has allowed me to raise a family and make a living in Petersburg.

As to conservation, you have a major user group basically fishing unrestricted, No size limit and a year long season minus the month of January. I'm sure a luggage handler in any Southeastern airport could attest to the tonnage leaving these fishing areas. It's creating a large market for wet-lock boxes but very little in the way of processing jobs and no raw fish tax.

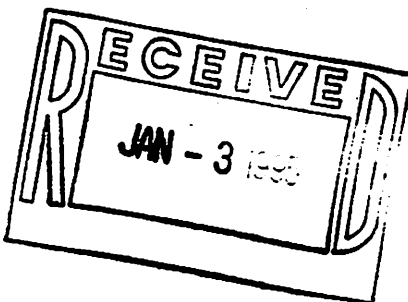
I feel my occupation as a crew member long lining and a vessel owner of a purse seiner unless a poundage cap is established for the sports fishing charter boats on bottom fish and all other species.

We've watched the battle going on over the Kenai River heat up over the years and foresee a situation like that happening in other areas throughout the state unless this issue is addressed immediately.

Sincerely,

James Green  
James Green  
P.O. Box 1154  
Petersburg, Alaska  
99833





December 27, 1994

North Pacific Fisheries Management Council  
PO Box 103136  
Anchorage, AK 99510

Chairman Lauber and Council Members -

**On behalf of the Ketchikan Trollers Committee, I strongly urge the Council to take action to control the expansion of the guided-sport harvest of halibut to protect the integrity of the IFQ system.**

We recommend that this guided halibut-extraction industry be separated from the non-guided "personal use" sport fisheries and then be granted fixed yearly harvest percentages of the various area quotas, based on harvest rates from recent years. With fixed harvest percentages in place, responsible management of the guided sport halibut fisheries can then be accomplished by IPHC and the ADF&G Board of Fisheries.

At present, guided-sport advocates in Alaska are able to avoid close attention to their fisheries by claiming that *any* current forum (whether it is a meeting of NPFMC or ADF&G or IPHC) is not the proper management forum for their industry. For example, at IPHC meetings the charter groups argue that proposals affecting their fisheries should be presented to the Board of Fisheries. Then, sometimes only weeks later, the same groups will testify before the Board of Fisheries that similar proposals should be addressed, *in a year*, to IPHC. Meanwhile, the number of charterboats and lodges continues to expand. **We urge you to take action to place a cap on the harvest from this expansion.**

We also ask you to look skeptically at any information being presented by ADF&G Sportfish Division. The advocacy actions of this supposedly scientific agency have become an embarrassment to many non-biased observers throughout Alaska. During recent years, in meeting after meeting, the ADF&G Sportfish Division representatives have testified that the growth in the lodge and charter industry has slowed or stalled. Meanwhile, the number of charterboats and lodges continues to expand at a dizzying pace. At the next set of meetings, with a new set of Board members, the Sportfish Division "spin" begins again. Please don't let these guys con you into a do-nothing delay.

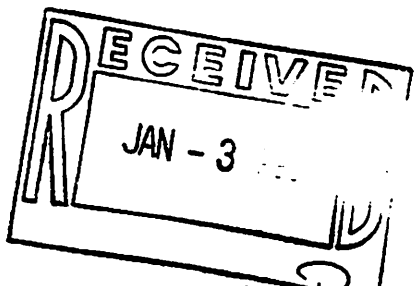
We believe that all commercial users of Alaska's fishery resources must be responsible for their actions. There should be no free rides in the commercial fish-extraction world. At present, the guided-sport industry acts like an over-grown teenager in desperate need of some "tough love" and some limits. We ask the Council to do some overdue parenting and set these "kids" on the road to fishing maturity.

Thank you for this opportunity to advocate our views. Ketchikan Trollers Committee is a grass-roots support group for salmon trollers in southern Southeast Alaska. Current paid KTC membership is 282. Most of our members own and operate small vessels and are very dependent on the halibut fishery (and the coming IFQ system) to supplement their incomes. (Please note that KTC is an independent organization, separate and distinct from the Alaska Trollers Association.)

Sincerely,

A handwritten signature in black ink, appearing to read "L. Haughton". The signature is fluid and cursive, with a large initial "L" and a long horizontal stroke extending to the right.

Lonnie Haughton - Secretary/Treasurer  
Ketchikan Trollers Committee  
PO Box 3006  
Ketchikan, AK 99901  
(907) 225-1289 and (907) 225-0600 *fax*



1635 WHISPEN Pines Dr  
SEASIDE, OR 97138  
24 Dec 94


CHAIRMAN RICHARD LAUBER  
N.P.F.M.C.  
ANCHORAGE, ALASKA

DEAR MR LAUBER:

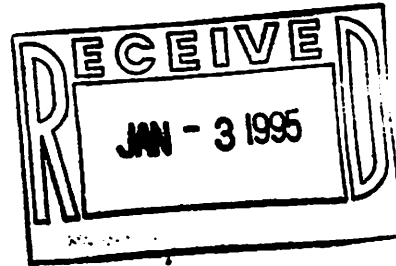
I AM A COMMERCIAL HALIBUT FISHERMAN. I AM VERY CONCERNED ABOUT THE GROWING HALIBUT CHARTER FISHERY. I HOPE THAT THE N.P.F.M.C. WILL ADDRESS THIS ISSUE ASAP.

AS A VESSEL OWNER I HOPE SOME CONCERN ON OUR P. & I. RESPONSIBILITIES WILL BE DISCUSSED IN THE NEAR FUTURE. WE SHOULD NOT BE RESPONSIBLE FOR AN INDIVIDUAL WHEN HE IS OFF THE VESSEL, ESPECIALLY IN HIS HOME PORT, ON A HUNTING TRIP IN THE EASTERN PART OF THE STATE.

HAVE A GOOD 1995 AND  
THANK YOU FOR SERVING ON THE COUNCIL.

  
JOHN A. SVENSSON  
F/V LIVELY JANE

BARBARA K. DESROCHERS  
P.O. BOX 184  
ESTER, ALASKA 99725  
PHONE: (907) 474-8821  
FAX (907) 479-4871



TO: ATTN: DAVE W. THERALL. DATE: 1-3-95  
TIME: \_\_\_\_\_  
FAX: 271-2817

I DO NOT AGREE WITH HAVING MORE CONTROLS ON SPORTFISHING CHARTER GUIDES & PUBLIC SPORTFISHING. INSTEAD REGULATE STIFFER CONTROLS AND/OR FINES ON BYCATCH WHICH IS APPROX. 3,250,000 INDIVIDUAL FISH NOW. THE INDIVIDUAL HALIBUT CATCH BY ALL THE PUBLIC AND SPORTFISHING CHARTER GUIDES IN ALASKA IS APPROX. 310,000 INDIVIDUAL FISH. THESE FIGURES SPEAK FOR THEMSELVES! THE PUBLIC HAVE A RIGHT TO CATCH HALIBUT AND WE DO NOT NEED MORE CONTROLS THAN WE ALREADY HAVE.

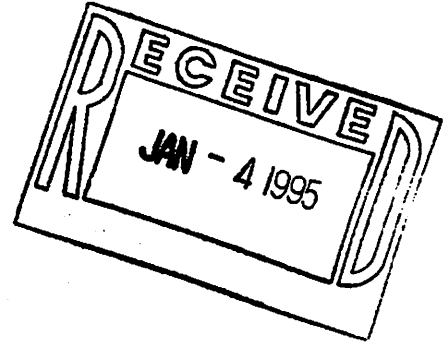
FROM: BARBARA K. DESROCHERS

Barbara K Desrochers

NUMBER OF PAGES INCLUDING COVER: 1

# PETRE'S CHARTERS

5901 Boondox Drive  
Salcha, Alaska 99714  
907-488-4589  
Fax 488-4589



1/1/95

TO: Mr Richard B. Lauber  
Chairman North Pacific Management Council

FROM: Dennis D. Petre

I am writing you at this time to express my concern over the attempt by the Sitka Long Liners to have IFQ'S imposed on the Charter Boats of the State of Alaska. This really bothers me that you may try to regulate me because someone else said there might be a problem which doesn't exist. Where is the evidence? The Doug Vince Lange report was proved to be false..... But you are right there are things we must address.

1. Why are there no voting members on the council that represent the charter boat operators? The council was established by the Magnuson and all user groups where supposed to be represented. This is the only council that is made up of all commercial fisherman.

2. The IFQ'S for Halibut where set up as an experiment to see if they would work. Why didn't you put the sable fish IFQ'S out first to see if they would work first? You never even did a study of the Halibut IFQ'S to see what kind of impact that it would have on the Charter Boat Industry. If you did a study on the Charter Boats and the Tourist Industry I would like to see it.

3. Commercial fisherman catch fish by the pound and uses the fish for resale and for his own personcl use. A charter boat has customers who are allowed to catch 2 fish per day and have a total of 4 in possession . How do you develop an IFQ using that information?

4. Why are you even bothering with this issue? Ninety-five percent of the Charter Boats fish in state controlled waters and have a state controlled bag limits. The fish which are taken are for personnel use by their customers which has the highest priority as a user group. Should we discriminate between resident sport fisherman by denying them access to go halibut fishing because they don't own a boat? Will people who want to go halibut fishing have rent small boats in order to go fishing? Just think of the safety aspect of this. Who will be responsible for their safety?

5. The commercial fishing industry needs to clean up its own act before it takes on some else. By-catch and waste, over fishing and over capitalization are just part off the problems facing the commercial industry. The North Pacific Management Council has let these get out of hand which only proves a point that

commercial fisherman can not govern them selves how can they govern any one else.

6. The Commercial IFQ'S should not be used to catch sport halibut. The whole idea of allowing commercial fisherman to use their IFQ'S to sport fish is a bad idea. A commercial IFQ should be used for commercial fishing only.

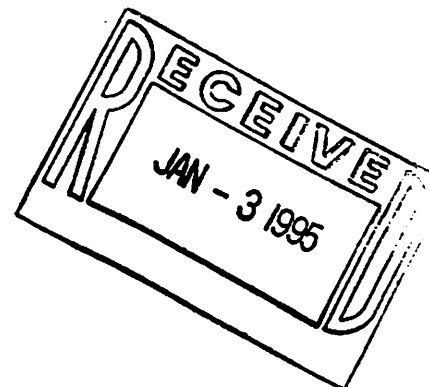
I would like to hear for you on these subjects when you have time.

Sincerely:



Dennis D. Petre

KODIAK CHARTER ASSOCIATION  
1424 BARANOF STREET  
KODIAK, ALASKA 99615



NPFMC  
Atten: Dave Witherall  
P.O.Box 103136  
Anchorage, Alaska 99510

December 31, 1994

Dear Council Members,

This letter is to reaffirm the Kodiak Charter Association's support of the September 23, 1993 moratorium date, concerning the IPHC sport charter halibut licenses.

Since the date was announced the Kodiak Island area alone, has seen an increase from 23 to approximately 104; an approximate 450% increase in the IPHC Sport Charter licenses. These numbers are based on figures supplied to us by IPHC on December 29, 1994. We believe that these figures alone should be enough to support implementation of September 23, 1993 as the control date.

As the numbers increase, the potential for conflict with other user groups rises. We are not interested in specific allocations for the charter fleet, however, left unchecked, the sport charter catch will eventually be an issue again in the future. Uncontrolled growth in the charter industry can only lead to conflict with other user groups.

Even though the number of licenses has increased in the Kodiak area, the number of participants in the charter industry has not. This leads us to believe that the majority of these licenses have been obtained purely on speculation. If fully utilized these licenses can only have a detrimental effect on an individual's IFQ shareholdings. Since the implementations of IFQ's, the sport charter fishery is the only halibut fishery left open for entry. If left unchecked at what rate will these licenses increase in the coming years.

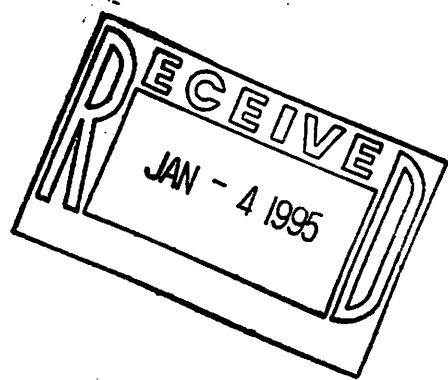
We feel that considering the fact that there are over 700 sport charter licenses in Area 3A alone, the potential for re-apportionment of the fishery is a real concern. We feel that if the council takes action on the Sept. 23, 1993 date, and implements that as the control date for entrance into the sport charter halibut fishery, that many of our expressed concerns will have been addressed, and the status quo among user groups will be maintained.

Kodiak Charter Association  
President  
David Rugni

*David Rugni*

January 2 1995

Chairman Richard Lauber  
North Pacific Fisheries Management Council  
P.O. Box 103136  
Anchorage AK 99510



Dear Chairman Lauber;

I am a commercial and sport halibut fisherman. I am concerned about the halibut charter industry growing in unlimited leaps and bounds. And yet there is no accurate accounting of how much fish is actually being taken. If this kind of management scheme were used in the commercial fisheries, utter chaos would surely erupt.

In Sitka the near-town grounds are being seriously depleted. Once an easy task to go out and catch a halibut, becomes increasingly difficult, making it necessary to travel further from town or to "go without" Many local subsistence halibut fisherman have small, slow boats unable to travel very far. The charter fleet going to larger and faster boats able to range farther still in rougher seas.

The local halibut charter fleet has doubled in the past year. These boats fish from may to september, alot of boats fishing 100 days per season and more. More than one run per day being the norm. In Homer, when days are long they go out late at night and return early in the morning able to take two days worth of limit in one short trip. This kind of activity will only increase unless something is done NOW!!

Some kind of management scheme is necessary for the halibut charter industry, there is none now. I urge you to take effective action, before other traditional users are displaced.

Thank you

Sincerely  
James T Swift  
P.O. Box 1725  
4319 Valhalla Drive  
Sitka AK 99835  
907-747-3156  
Fax 747-3462

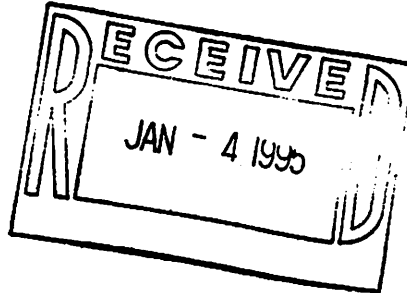


## ***Goodhand Fishing Charters***

winter: P.O. 218, Ester, Alaska 99725 ph. 907-479-5562  
summer: P.O. 970, Valdez, Alaska 99686 ph. 907-835-4333

January 2, 1995

Clarence Pautzke  
NPFMC  
P. O. Box 103136  
Anchorage, Alaska 99510



Dear Sir,

I have grave concerns about possible controls being put on the sportfishing charter guides. First, IFQ's for comm-fish will affect sport and sport charter fishing, by conflicts on traditional sportfishing grounds. When IFQ's go into effect, the tendency is for the small commerical fisherman to fish closer in, which will cause a hardship to sportfishing. Charter operators in the past have stayed in port during a commerical opener, and for 3 to 5 days afterwards, because of being "fished out" by halibut long liners.

Now we will have this threat every day; holidays, weekends, etc. We see definite "comm-fishing attitudes" every July 4th weekend with pink salmon seiners, who surround "Winnepago Point" in Valdez, and take every pink right in front of hundreds of sportfishermen who can not reach other places to fish. My point is lack of concern for the public, who own the halibut resource.

My second concern is the public access to their resource. By controls on the charter fleet service, any person without a boat could find they are denied equal opportunity to this resource.

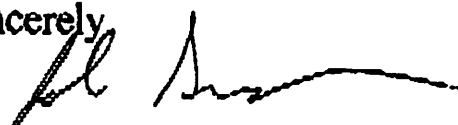
Third, if you want to save halibut resource, please look some place logical, and not slap the public. Make a statement to the public by looking at the Trawl Fleet. The NPFMC has recommended a Prohibited Species Catch of 3,775 metric tons, or 8,322,365 pounds, in the Bering Sea/Aleutian Islands, in this area alone. When you consider the average size of individual halibut caught by trawlers in this area is 2-3 pounds each [this is

generous - 1 pound and smaller is more real], this quantity is now 3,328,946 individual fish. If allowed to grow to a minimum size of 14 pounds each, that could be 46,605,244 pounds, or equal to about one years TAC.

When compared to 313,147 individual halibut caught by ALL sportfishing in Alaska, well, it becomes easy to see where more effort is needed. When you keep in mind this does not account for even half of the commercial bycatch in Alaskan waters, sportfishing is small potatoes, so get this issue into the round file where it belongs.

Reduction of bag limits will only put more pressure on rock fish and other species on the decline.

Sincerely



John Goodhand

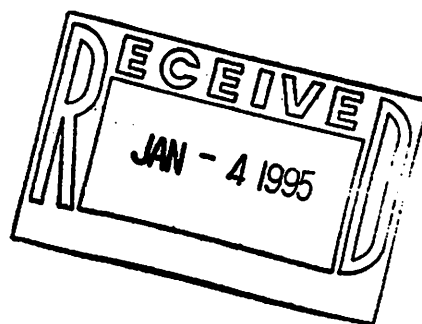
Sources cited:

"The Recreational Halibut Fishery in Southcentral Alaska"  
#94-1 by Scott C. Meyer ADF&G

NPFMC "Newsletter" of 12/20/94

Pacific Associates 5/93 "Discards in groundfish"

Randy Henderson  
PO Box 1125  
Petersburg Alaska 99833  
(907) 772-4656  
e-mail: Captain R @ aol.com.



To: North Pacific Fisheries Management Council  
Richard Lauber, Chairman

re: Halibut Commercial/ Sport Fisheries

Chairman Lauber and Council Members:

Thank you for this opportunity to comment on the halibut allocation issue. I've been a crewman on halibut longliners since 1980 and have operated a sportfish charter business for the past three years. My main concern is for the integrity of the resource, as I expect harvesting halibut will play a significant role in my future income, as it has in the past. With the changes in the fishery that are coming I am trying to adjust so that I can continue to support my family and live where I choose. That is why I have entered the sport charter industry, and that is why I am actively pursuing the purchase of IFQ's.

As I become more aware of what's going on in the sport charter fleet, I am realizing that there are some grave problems that I hope can be addressed by you, in cooperation with the State Dept. of Fish and Game and the Halibut Commission. My first concern is that no one has a good idea as to what the sport take of halibut in Alaska really is. I know that NMFS, the Halibut Commission, and ADF&G all have estimates, but my feeling is that no one has a good handle on this. There are many remote lodges, floating fish camps, and independent operators like myself, and virtually no system for reporting catches. It could very easily be significantly higher or lower than the estimates. If by chance it is significantly higher than current estimates, the future of the resource could be in grave danger. I urge you to immediately take measures to get an accurate estimate of the sport take of halibut.

One thing that everyone seems to agree on is that the sport charter fleet in Alaska is growing every year, and with it the sport take of halibut. I feel pretty certain that at some point the sport catch will be capped at a certain poundage level. It is not fair to other user groups that have poundage caps to see this user group expanding unilaterally at their expense. However as a charterboat captain I have hopes of someday expanding my own business, and I suppose most charterboat owners and lodge owners in the state would hope to do the same at some point in their future. Can you realistically allow for growth within the current industry and still invite new participants to enter in unlimited numbers? We are dealing with a finite resource, and I wonder if we are nearing the finite number of harvesters the resource can support. Therefore I support and urge you to immediately implement the moratorium

on new entrants into the halibut charter industry. This would give everyone time to look for answers to the questions that have been raised over the past couple of years and come up with solutions that will insure a healthy resource, while allowing current sport industry businesses the chance to grow. I'm aware that some sport groups would prefer to forego the moratorium and encourage studying the problem while allowing unimpeded growth in the industry. I think this is a dangerous alternative, and one that makes the problem harder to resolve in the future, as you know from experience in other fisheries.

I am very concerned about the future of the halibut resource due to the uncertainty of the sport catch and how it will be managed in the future. I hope the council will make some decisions at the January meeting that will help all user groups to be able to better plan for their future.

Thank you for the opportunity to address this issue.

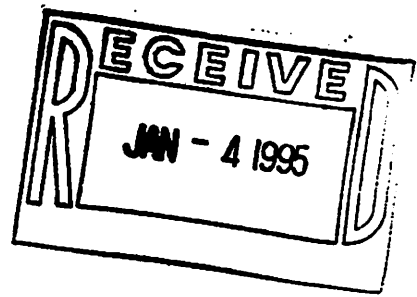
Sincerely,

Randy Henderson

**JOHN H. LEWIS**

4157 Raspberry Road  
Anchorage, Alaska 99502  
(907) 248-0791

January 2, 1995



Mr. Richard B. Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4th Avenue  
Anchorage, Ak. 99501

Re: C-1 Halibut Charterboats I.F.Q.

Dear Chairman Lauber:

We sportfishers believe this proposal should be voted down.

1. The International Pacific Halibut Commission has increased the Total Allowable Catch for Halibut long liners. (no biological reason.)
2. The trawlers are still not deck-sorting by-catch. (wanton waste of resource.)
3. The bycatch and waste in Area 3A is greater than sport-caught halibut. (This is the area of most halibut sport fishing. Ref: Special Publication #94-1, Department of Fish and Game, dated September 1994.)

We believe that before any restriction is placed on sport anglers, the commercial fishers should clean up their act. The economic impact of this I.F.Q. would be disastrous to communities such as Homer, Seldovia, Seward and Valdez.

The only justification for this proposal is the Greed of the halibut long liners.

VOTE DOWN C-1 HALIBUT CHARTERBOATS I.F.Q.!

Very truly yours,

A handwritten signature in cursive script, appearing to read 'John H. Lewis', written over the typed name 'John H. Lewis'.

RECEIVED 12 OF THESE FORM  
LETTERS, 11 FROM SITKA, 1  
FROM PETERSBURG.

Chairman Richard Lauber  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

Dear Chairman Lauber,

I am a commercial sport subsistence (circle appropriate) halibut fisherman. I am concerned about the effect the growing halibut charter fleet is having on historic halibut fishermen and Alaskan coastal communities. I am writing to urge the Council to address this issue immediately.

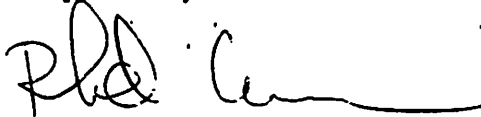
Coastal communities throughout Alaska have developed a cultural and economic dependence on the halibut resource. Traditional sport and subsistence fishermen have harvested the resource sustainably for generations, demonstrating a strong commitment to conservation. Commercial fishermen have supported restrictive quotas, adopting additional conservation measures as necessary. Under this regime, the halibut resource has remained healthy and abundant. This history of wise stewardship must be continued.

The halibut charter fleet is expanding with little or no restrictions. The impact of this fleet is far greater than catch data indicate. Charter boat effort is concentrated in near-shore areas, reducing the availability of halibut to local residents and disrupting sport and subsistence activities. The fleet is ranging farther and farther from towns, using high-powered vessels to find still productive grounds. Although localized depletion in near-town areas may or may not present a conservation concern for the resource as a whole, the cultural and socioeconomic impacts are substantial. Responsible management of the halibut resource dictates that the expanding charter fleet be controlled.

I urge the Council to develop an effective management program for the halibut charter fleet. Limiting the growth of the charter fleet will prevent traditional sport, subsistence and commercial users from being displaced. Your immediate action on this issue is critical.

Thank you for the opportunity to comment.

Sincerely,

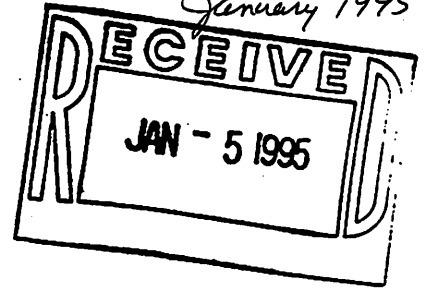


Richard Curran

Box 1336

SITKA, ALASKA, 99835

*Agenda C-1  
Supplemental  
January 1995*



Chairman Richard Lauber  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

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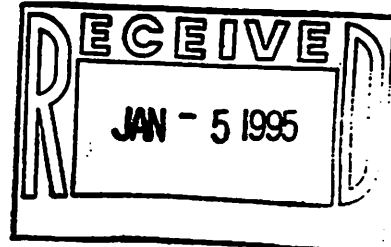
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Thank you for the opportunity to comment.

Sincerely,

*[Handwritten Signature]*  
RICHARD G. URIAS  
612 BORKA  
SITKA, AK 99835

Chairman Richard Lauber  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510



Dear Chairman Lauber,

I am a commercial /sport/ subsistence (circle appropriate) halibut fisherman. I am concerned about the effect the growing halibut charter fleet is having on historic halibut fishermen and Alaskan coastal communities. I am writing to urge the Council to address this issue immediately.

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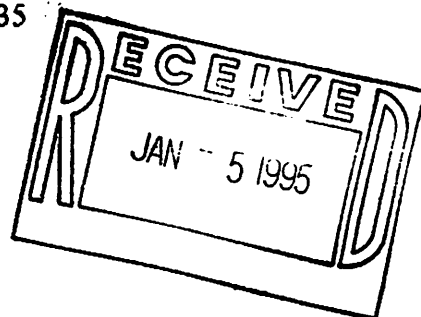
Thank you for the opportunity to comment.

Sincerely,

*Thomas S. Lauber*



William G. Ferguson  
P.O. Box 2575  
Sitka, Alaska 99835  
January 4, 1995



Rick Lauber, Chair  
NPFMC  
Box 103136  
Anchorage, AK 99510

Dear Mr. Lauber,

This letter is written to voice my concerns over Halibut take by the charter fleet in Southeast Alaska and particularly in the Sitka waters. I am a sport and subsistence fisherman. In recent years as the charter fleet in Sitka has grown, the old holes which produced Halibut on a regular basis are no longer productive and the talk of the locals is that there is no Halibut available "in close". It has become extremely frustrating to go to the fishing grounds at 4 AM in the summer and see 2 local "true" sport fishing boats with one or two people on board and 15 to 20 charter boats with 4-6 people on board. It's even more frustrating to realize that these charter operations are managed under the same rules as local sport and subsistence fisherfolk but often provide 3 and 4 trips to clients per day.

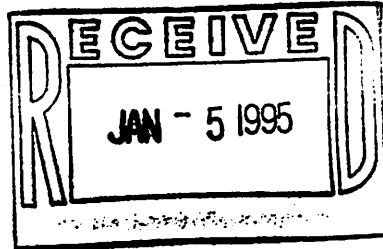
At the very least, I would like to have some accountable numbers as to the charter fleet harvest. I believe that they are having a very strong negative impact on the Halibut grounds in this area and would prefer to see them managed differently with some potential quota or stopping point.

My family and I rely on Halibut for subsistence. It has historically been one of our staples. It further troubles me to think that many of these Halibut are taken by tourists who do not know how to prepare it and the fish is stored in a freezer until it develops freezer burn and is then wasted.

I see our Halibut stock diminishing more and more. Small boats have to go to more open and dangerous waters and further from land. Without proper management, we will rape the resource. I think some limitations need to be applied to the charter fleet with a different approach to management than that of the "true" sports fishers already in place. I urge the council to act on this issue as soon as possible. Thank you for the opportunity to be heard.

Sincerely, *William G. Ferguson*

William G. Ferguson  
cc: Tony Knowles, Governor  
Carl Rosier



1-5-95

To.

Mr. Rick Jamber,

I have commercial fished in the Sill-Noyes - Coronation - Barrow of Inland outer coastal waters for 31 years.

The halibut charter fleet needs size limits, bag limits and also restrictions from the near shore "chicken patches", as from my own observations they are targeting the easiest catch that is in the areas of heavy concentration of juveniles.

Also in the Cray area this fleet goes unchecked as are taking tons of juveniles every week.

Get them out of the small fish zone & have boarding parties to insure laws are complied with, please do it soon!

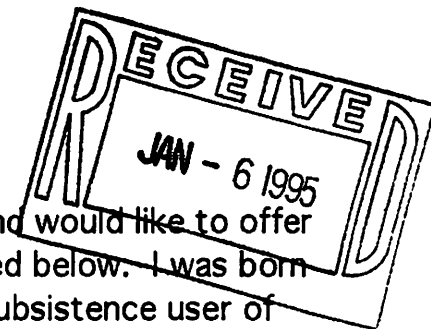
Robert J. Hall  
105 Behaver Court  
Sitka, Alaska 99835

907-747-7623

907-747-7624 FAX

Rick Lauber, Chairperson,  
• North Pacific Fishery Management Council  
(907)271-2817

1/6/95



I hear that you are having a meeting during the week of Jan 9-13, and would like to offer some input if I may? My name is Gary Olson, residence address listed below. I was born in Sitka 41 years ago, and have never left. I am also an infrequent subsistence user of halibut. When I feel the urge to eat and preserve halibut, that is when I fish for them. Once or twice a year, and never have the halibut denied my efforts. Until this year. I do not ask for much, but having one halibut in my freezer during the winter is very important. But now the halibut are simply not there to catch! What is happening?? I am truly afraid this trend will continue if nothing is done!

Two possibilities I have for the decrease of halibut and neither of the ideas are mine, nor are they shared only by me. The first, most obvious, would be the increase of charter boat operators, and the number of trips each make (per: day, week, month, year). The second is something I read somewhere, that when the sac roe fishery takes place, the carcass of the herring is dumped out in Sitka Sound! Isn't that amazing! There is so much food, that the carcass rots, and halibut nor bass, crab or whatever can eat it all and keeps the healthy animals away. I do not know if this is possible, but it sounds probable to me.

Two simple actions need to take place. Limit the number of charter boat operators to the level it was in 1990, and quit allowing the sac roe processors to dump [the carcass of the herring. If they cannot use **ALL** the herring, they should not have any of it.

Thank you for allowing me to testify by the written word. The halibut need more respect than we have been giving them.

Gary Olson  
2006 Cascade Creek Road  
Sitka, Alaska 99835

Alaska Sportfishing Association  
3605 Arctic Blvd. #800  
Anchorage, Ak 99503

North Pacific Fisheries Management Council  
Attn: Mr. David Witherall

Via Fax

Dear Mr. Witherall,

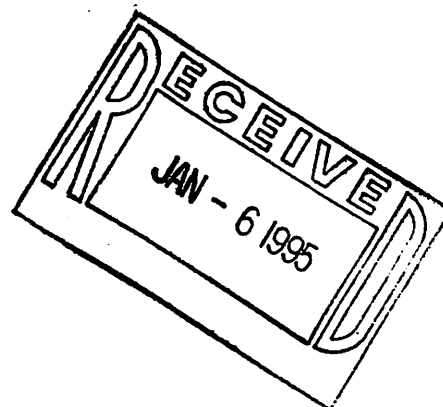
The Alaska Sportfishing Association (ASA), Alaska's largest sport fishing group, would like to take this opportunity to offer its written comments in regards to the ALFA proposal which asks the NPFMC to place limits on **guided halibut sport charter operations** .

ASA is opposed to any action which would implement any limitations at this time for the following reasons:

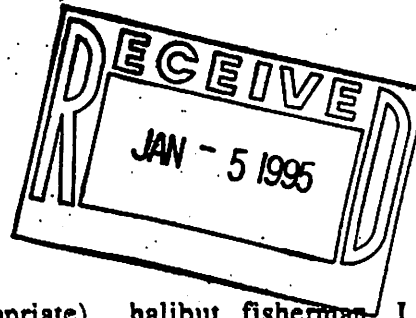
- we oppose any effort to have differing regulations between guided and unguided sport fishing no matter where the venue.
- we don't think that its prudent to initiate additional new regulations on a fishery that will be undergoing significant changes under the impetus of other new regulations (IFQs) until the Council has some real-life feedback as to the impacts of the other Regs.
- we frankly feel that the ALFA proposal was ill-conceived and is a thinly veiled attempt to redirect the Council's attention away from doing its job of managing the much larger lucrative commercial halibut fishery.
- ASA is a strong supporter of minimizing incidental catch in our fisheries; be it by sport fishers or commercial fishers. Since the incidental catch of halibut in the commercial fisheries far exceeds the harvest by sport fishers, its seems that we could obtain a higher return for our efforts if we emphasized a program aimed at reducing the incidental catch.

Thank you

Phil Cutler, President



Chairman Richard Lauber  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510



Dear Chairman Lauber,

I am a commercial / sport / subsistence (circle appropriate) halibut fisherman. I am concerned about the effect the growing halibut charter fleet is having on historic halibut fishermen and Alaskan coastal communities. I am writing to urge the Council to address this issue immediately.

Coastal communities throughout Alaska have developed a cultural and economic dependence on the halibut resource. Traditional sport and subsistence fishermen have harvested the resource sustainably for generations, demonstrating a strong commitment to conservation. Commercial fishermen have supported restrictive quotas, adopting additional conservation measures as necessary. Under this regime, the halibut resource has remained healthy and abundant. This history of wise stewardship must be continued.

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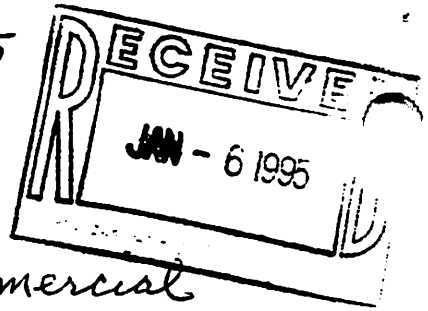
I urge the Council to develop an effective management program for the halibut charter fleet. Limiting the growth of the charter fleet will prevent traditional sport, subsistence and commercial users from being displaced. Your immediate action on this issue is critical.

Thank you for the opportunity to comment.

Sincerely,

*Robin A. Stedman*

1-1-95



Dear Chairman Lauber,

I am a resident Alaskan Commercial Halibut fisherman. I am writing to express my concern over the unregulated, rapid expansion of the so called guided-sport harvest halibut charter fleet.

The catch rate of this Commercial Charter fleet, and they are a Commercial enterprise, is allowed to grow with no restrictions, as to the number of boats fishing and no size limit on the Halibut caught. It also appears that the 2 Halibut per day is a gray area, with many loop-holes to circumvent the law.

Responsible management of the Halibut resource dictates that the Charter fleet be controlled. I would urge the Council to separate the sport fishermen from the Charter fleet, and then place a limit on the Charter fleet harvest. If you have ADF&G Commercial numbers, you are a Commercial fisherman.

Thank you.

Sincerely  
Harold E. Kelfrich  
P.O. Box 6278  
KETCHIKAN, AK. 99901

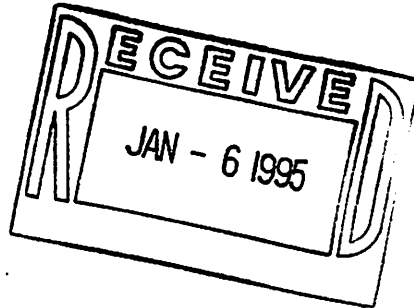


# SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

January 6, 1995

Richard Lauber, Chairman  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510



Dear Chairman Lauber,

The 350 member fishermen of the Seafood Producers Cooperative are very concerned about the rapidly expanding halibut charter fleet, and its' effect on the halibut resource in Alaska.

Commercial fishermen have harvested halibut in Alaska for many years under a management system that has kept the resource healthy and abundant. They have supported quotas, and have adopted other conservation measures whenever the resource was threatened.

In recent years the halibut charter fleet has grown rapidly with virtually no restrictions on their harvest. The impact of this fleet on the halibut resource is far greater than current catch data indicates, and must be considered a very real threat to the health of the entire halibut fishery in Alaska.

We urge the Council to develop an effective management program for the halibut charter fleet. The program should limit the growth of the fleet, and make the fleet subject to the same restrictions and conservation methods that commercial fishermen in Alaska have practiced for many years.

Thank you for your consideration.

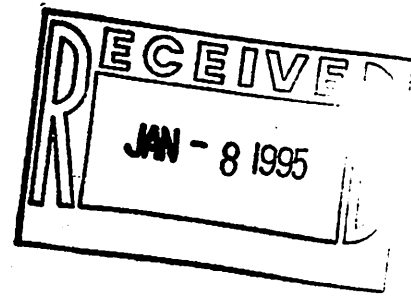
Sincerely,

SEAFOOD PRODUCERS COOPERATIVE

  
Barry S. Lester  
General Manager/C.E.O.

North Pacific Fishery Mgt. Council

Re; Halibut Charter Industry.



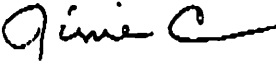
As an operator/owner of a charter boat we are aware of a push to regulate our part of the industry, we agree that some regulation is needed, but feel that we should have a voice in setting any regulations.

We request that the State Board Of Fish be given regulatory authority over the Alaska Halibut Charter Industry, and to register with the State to establish a data base to determine an extent of a problem if any.

Also instate a size limit window (ie. 30"to60") and maybe limit the number of lines in the water to paying customer's and skipper's and deckhands not take daily limits.

Also set off further deliberation until the April 95 meeting of the N.P.F.M.C. or better yet until the Halibut ~~Charter~~ Boat industries are represented on the advisory council and the board.

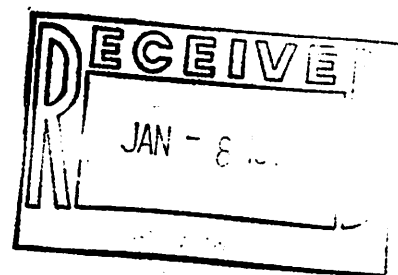
Thank you for any help that you can give us, as you as a group hold all of our future's in your hands.

Jimi Carlsen  
  
owner/operator  
Charter Connection  
Seward Alaska



Rick Lauber, Chairperson  
North Pacific Fishery  
Management Council  
1-907-271-2817

1/6/94



Mr. Lauber;

I CAN'T BELIEVE MY EYES! An article appeared in the Sitka Sentinel tonight that I could not believe! Barbara Bingham is quoted as saying "...it's not a crisis situation", referring to the apparent disappearance of halibut in Sitka Sound last year. If your child or brother or sister disappeared for a year, would you be worried? I would. I AM!

She also said "...it's members (Charter Boat Operators) are in a 'pretty good position' right now to make recommendations on problems before they get out of hand."

I am a subsistence user, Mr. Lauber, and the idea of going out and catching 1 or 2 halibut a year is very important to me. This year I could not do that, because there were no fish, in close, to catch! I don't have a big 28 or 32 footer that can go out to the Cape (Edgecumbe) every day to catch fish. This is where all the boats had to go, further away from Sitka than ever before, since I can remember. I was born here 41 years ago, and have never left.

If you could pick ANY DAY in June or July, and go to the airport between 11 am and 1 pm, you would be sickened, by the very thought of how much fish is being shipped out on the jet, belonging to individuals who just got done chartering a boat. The place stinks, and just imagining the AMOUNT of fish going out, is sickening. The plunder continues through August.

I am embarrassed that people would abuse a fishery like this. It is not the only one, and like the others it will be abused until no one can make a living with it except big business (ie the most luxurious charter, or the most IFQ's). The little guy, who believes the halibut have just as much reason to live as we do, will be shoved aside.

Rather than make this letter one total complaint, I should add also my ideas for a remedy. First the IFQ's: They should be non-transferable. If anyone gets them, the State should. They can be willed, but other wise they go to the State.

**CHARTER BOATS:** All permits issued after 1/1/90 should be recinded. The last 4 years have seen a marked increase in disrespectful, highly skilled fish killing machines.

I don't think that "...the perspective is a little skewed" as Barbara Bingham put it. I think the halibut are in big trouble. I think her thinking is a "little skewed" because she knows she will make money, at least for the next few years. Until the people who rent Charter boats realize there is no fish left in Sitka, Alaska.

Thank you very much for letting me offer my opinion.

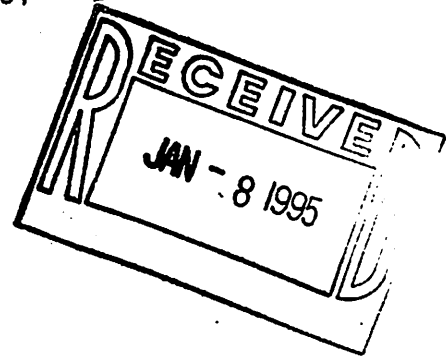
Jary Olson  
2006 Cascade Creek Road  
Sitka, Alaska 99835

SEWARD CHARTERBOAT ASSOCIATION  
P.O. BOX 3125  
SEWARD, ALASKA 99664

January 5, 1995

To: North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510-3136  
FAX # 271-2817

From: Seward Charterboat Association  
P.O. Box 3125  
Seward, AK 99664  
FAX # 224-2026



We respectfully request that deliberations concerning the Halibut Charter Fleet and its potential regulation be set off until the April 1995 meeting. Further, we request that consideration be given to allowing the State of Alaska Board of Fish to regulate this industry.

Specifically, we propose that all halibut charter operators register with the State of Alaska, and that data be gathered for a time to determine the extent of the problem, if any.

Further, the Alaska Halibut Charter operators agree to limit the number of lines in the water to the number of paying customers aboard the vessel. Sport guides and deck hands will no longer take daily limits of fish for their personal use during charter for hire activities.

We believe that a control date and moratorium are invalid with the current data base. Should a moratorium become necessary, it should issue forth from the date of the regulatory decision. Licenses should not be held or acquired for speculative purposes. If licenses are not put into service within a reasonable time (to be determined), they should be forfeited.

Respectfully,

SEWARD CHARTERBOAT ASSOCIATION

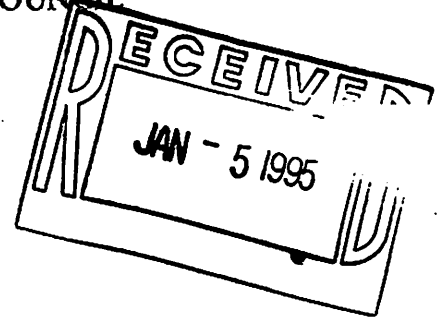
By: Wayne A. Carpenter  
President

WDC:fh

COPY TO NPFMC ADVISORY PANEL

**HALIBUT CHARTER AMENDMENT PROPOSAL****NORTH PACIFIC FISHERY MANAGEMENT COUNCIL**

**Name of Proposer:** Homer Charter Association  
**Date:** January 9, 1995  
**Address:** P. O. Box 148 Homer, Alaska 99603  
**Telephone:** (907) 235-2282

**FISHERY MANAGEMENT PLAN****Brief Statement of Proposal:**

1. We request a 3-5 year moratorium be placed on new entrants into the Sport Halibut Charter industry using the 9-23-93 control date as proposed by Clem Tillion at the September 23, 1993 NPFMC meeting. During the moratorium establish a solid base of information with respect to regional catch rates and regional participation utilizing information from ongoing studies and surveys by Alaska Department of Fish & Game.
2. Establish regional zones for study.
3. Allow the State of Alaska to Develop a management plan for Sport Halibut Charter businesses.

**Objectives of proposal: (What is the problem?)**

The problem is the commercial fishing interests perceive the Sport Halibut Charters as unregulated in their catch and industry growth. The problem can be solved by holding the Sport Halibut Charter Industry to its 9/23/93 level with no growth for a 3-5 year study period to determine the Sport Halibut Charter impact on the Halibut resource, as well as the economic and social impact on local and state economies.

**Need and Justification for Council Action: (Why can't the problem be resolved through other channels?)**

The North Pacific Fishery Management Council is the management body authorized to make allocative decisions affecting the Alaskan Halibut Fisheries.

**Foreseeable Impacts of Proposal: (who wins, who loses?)**

1. The moratorium would prevent speculative entry into the Sport Halibut Charter industry.
2. With an unbiased study we should be able to establish the value of the Alaska Sport Halibut Charter Industry and its impact on the Halibut resource. If it is shown after the 3-5 year study period that controls are needed for the health of the resource then a management system could be implemented.
3. By allowing the State of Alaska to manage the Sport Halibut Charter industry would relieve the NPFMC of this contentious matter.

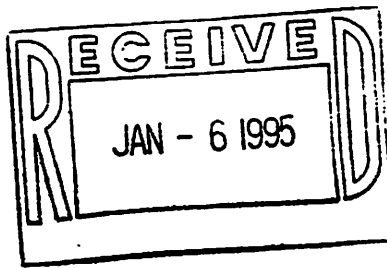
**Are There Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?**

The representatives of several Sport Halibut Charter Industry groups can identify no other workable solutions at this time which would not disrupt the recreational fishery.

**Supportive Data & Other Information: What data are available and where can they be found?**

IPHC, AK D F & G and NPFMC studies and other information available from the Halibut Charter Association of Alaska.

*Sean Martin*  
 Sean Martin  
 Homer Charter Association



January 4, 1995  
714 Sirstad St.  
Sitka, Alaska  
99835-7231

Dear Mr. Lauber,

I am a sport and subsistence halibut fisherman here in Sitka. I am writing to you to address concerns I have about the explosive growth of the halibut charter industry in Sitka, and the resultant rapid decline of the halibut stocks in the Sitka Sound area.

The halibut charter industry has rapidly expanded in the last few years. Less than a decade ago, there were few, if any, charter boats in Sitka, and now there are more than a hundred.

They are taking hundreds of halibut out of a very small area every day, day in and day out. It has become very difficult for someone who owns a small boat, such as myself to find any halibut at all in areas that are accessible to me. It is not uncommon to see 40 or 50 charter boats working the area around Vitskari Rock every day. This used to be a good place to catch halibut, and now it has been stripped clean.

Since the closure of salmon fishing off the coasts of Oregon and Washington, many of their charter operators have moved to Sitka, increasing the pressure on the local stocks.

I feel that the growth of the charter fleet is directly responsible to the decline of the halibut stocks in the Sitka Sound area. There are very few large fish left. As you know, these are the spawning females, and they are the prime target of the charter fleet.

The charter fleet has fished the Sitka Sound area to the point where it does not have any halibut left. Now, they are going outside of Cape Edgecumbe, and fishing the areas offshore

of Kruzof Island. This in and of itself should be a strong indicator that the halibut stocks are depleted, when they can no longer be found in their traditional areas.

Such predation has been seen before. The halibut stocks were almost totally wiped out by winter commercial halibut openings, until the openings were stopped. Only then, did the halibut stocks begin to rebuild.

It is nothing more than commercial greed that is causing this problem, and it must be addressed and stopped immediately, before it is too late. As it is, it will take more than a decade for the halibut to rebuild.

I feel that the charter fleet must be regulated, both as to when they can fish, where they can fish, and how many fish they can keep. Right now, a 6 pack charter boat can keep 16 halibut a day, counting the owner and a crewman. And sometimes they make 2 trips a day. That's if they stick to the limit, which is assuming a lot.

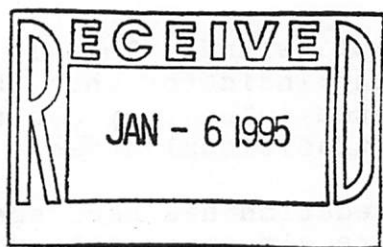
I feel the boats should be limited to one fish per person, excluding captain and crewman, and a 32" size limit like the commercial fleet has. I also feel that charter operations should be regulated as a part of the commercial fleet. No matter how you define it, they are fishing for money, and that makes it commercial.

Regardless of what action is taken, I think drastic action is needed immediately to save our declining halibut stocks, and to prevent the overfishing of the salmon and rockfish stocks as well. These operations are as big a threat to our fish stocks as the drift netters were, and they need to be controlled.

Sincerely,

*Bill Peters*

1-5-95



Mike Trana (TRAINOR)  
105 Barlow  
Sitka Alaska  
99835

Mr Rick Lauba  
N.P. F. M. C  
Box 103136  
Anchorage Ak 99510

Dear Mr Lauba

I live in Sitka. I am a sport  
and subsistence fisherman. Quite simply I  
fish to feed my family and enjoy  
doing it. In years passed I have  
always caught halibut. Here in Sitka  
we have seen a huge increase in  
the charter fleet. Because of this  
it is now rare to catch Halibut  
in Sitka Sound. Please stop  
this uncontrolled cancer. If one wants  
to charter to take people sightseeing,  
whale watching etc. Fine!! But there  
must be a limit on charter <sup>fishing</sup>. How  
about lowering their catch to one →

Habitat per day and the crew should not  
be allowed to keep fish.

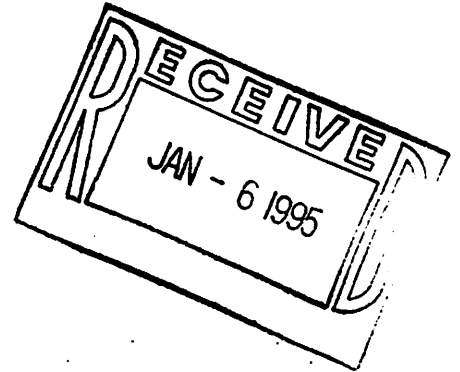
You also need to know that many  
Charter people already have good State and  
Federal jobs. Limited their Chartering will  
not take food out of their mouths.

These people are making lots of money  
despite what they tell you.

Sincerely Mike Trana

# Luck of the Irish Charters

P.O. Box 55194  
North Pole, Alaska 99705



January 2, 1995

Richard Lauber  
Chairman  
North Pacific Management Council  
P. O. Box 103136  
Anchorage, Alaska 99510

Dear Mr. Lauber

I am quite concerned by possible recommendations from the North Pacific Management Council to the International Pacific Halibut Commission. Hopefully you will respond with a letter of explanation on any position taken by the council you chair.

Like many Alaskans my family and I own and operate a small business. We have worked very hard for over ten years to build our charter business and we depend upon it to supply the family income. We have our entire lifes savings invested in a vessel and equipment.

The charter industry is a growing industry and I can understand your reasons for concern. However the current rate of growth for the charter industry would take decades to come close to the current bycatch of the modern trawler fleet. Limiting the charter operators to possible IFQs or other catch limiting methods would hurt the economy of Alaska, and present a very unfair, if not unlawful, burden on non boat owning individuals.

I provide an opportunity for the tourist and the Alaskan residence to catch

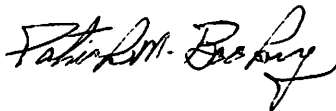


personal use fish. The income from this activity feeds my family as well as makes jobs at the local stores, gas stations, hotels, restaurants, and a host of other services required by the tourist industry and the year round resident. Field and Stream's magazine and The Washington Times state that a sport caught personal use fish delivers over \$400 to the local economy per fish, where as the commercial fishermans fish might deliver \$30 to the same economy.

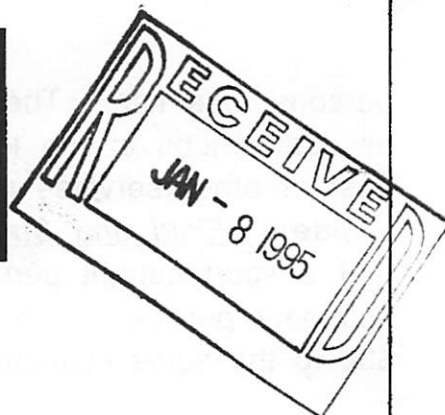
It is my belief bycatch is primary evil to our fishing resource and everything possible must be done to clean up this method of harvest. Personal use fisherman may start to demand their state and federal legislators work to stop this wasteful practice within United States waters.

Hopefully some kind of solution can be worked out at a future date. More input from the personal use fisherman and other user groups is needed. I feel they need to have been made fully aware of the issues and had proper time to respond.

Sincerely



Patrick M. Bookey



TO : North Pacific Fisheries Management Council  
RE : Halibut Sport Charter Issue  
FROM : Robert Candopoulos Saltwater Safari Co. Inc.  
DATE : 1/6/95

I agree with the proposal drafted by the Homer Charter Association on all but two counts.

First, I do believe in a moratorium on new entrants yet, I am compelled to ask; What is the definition of a "new entrant"? If by placing a moratorium that includes charter services such as mine in this category and removing the possibility for my service to one day purchase another boat and expand my operation, then I strongly disagree with this moratorium proposal.

I have invested my life in my business, not to mention over 1.5 million dollars in equipment and advertising in the excess of 50,000.00 per year in promoting Alaska. I feel that I would be more willing to accept a moratorium if a study were to be conducted on present day permit holders and find out how many of these permit holders are actually using these permits or if they are holding them as a future investment.

I feel that we should look at all aspects of who, how and when permits are issued. For instance, what is to keep a large tour outfit with 8 or 9 vessels that carry several hundred passengers each, from securing permits now and putting them on the block in the future for operators such as myself to purchase at exuberant prices? What is to keep every commercial fisherman or private boat owner from doing this as well?

I interpret a moratorium as being a means for interests outside the charter realm as having the potential to one day control legitimate charter operations in the future. Before a moratorium is enacted all possible avenues protecting the present day charter operator should be focused on. There are dozens of charter services in the Seward harbor that are permit holders, yet never fish for halibut. But to keep current they renew their licenses year after year. 99% of my operation is halibut fishing and to regulate me to a standstill in expansion because operators who don't need permits have them is unjust. This doesn't seem conducive to my operation, any other halibut charter service or to the state as a whole.

I feel that the term 'new entrants' should not include halibut charter services that are presently in operation and whose livelihood is based on the right to do whatever is needed to keep their business strong. I feel that each charter operation that wants a permit for this halibut fishery and that can show an active history in this fishery should be given first priority in the issuance of a permit. If we don't take heed to this problem now we are going to see a lottery type mentality overwhelm our industry. Everyone who owns a boat will go out and apply for a permit to cash in on it in the future.

These are my personal concerns in regard to the moratorium issue and I feel they make a strong case. If a moratorium is enacted I feel that issuance of permits should be conducted on a case to case basis and that operators who have created a legitimate history in this fishery should be given priority in the issuance of further permits if needed. Applicants that cannot show a viable involvement in this fisheries history should be included in the 'new entrant' classification.

I attended many of last years meetings regarding this issue and have come to only one major conclusion, and that is ; we have a long way to go before we all see eye to eye on these issues. But, while we are beating each others heads against the wall the real problem at hand is being pushed aside. That is, what do we do right now to protect the future of our sport and commercial fishery for halibut? I don't want to see Alaska end up like the rest of the West Coast with charter operations going bankrupt and people losing their livelihoods. Why not look at preserving our stocks in a more productive way.

For instance, I don't feel that a charter skipper and crew should be given the opportunity to catch their limit of halibut every day of the week. In the case of my operation that is running two boats a day with a captain and two deckhands on each boat, that equates to 12 halibut a day or 360 halibut a month. That is a substantial amount of fish I feel we could give back to this fishery.

What ever happened to the proposal from last year regulating the annual take per fisherman? That made alot of sense to me. It was pretty black and white. An annual limit being placed on all sport fishermen of say 10 halibut per season would be alot easier to regulate than the proposed I F Q plan and it would be more cost effective to regulate as well. Similar to deer or moose tags we would be able to keep data on how many fish were harvested each season , the region they were taken in , their size, sex ,weight and the means used for taking them i.e., charter boat , private boat ,etc.

To me that appears to be a very viable way to regulate the annual take of sport caught halibut as well as a great way to create funding that could be used to study and enhance this fishery in the future.

I feel that proper management and further study of the proposed moratorium is needed prior to implementation combined with a direct fisheries management plan such as the two aforementioned is the direction we should be headed.

Sincerely,

Capt. Robert Candopoulos  
President

Table 1. International Pacific Halibut Commission harvest estimates (thousands of pounds) of Pacific halibut by sport fishers by Regulatory Area, 1977-1994<sup>1</sup>

Year	Regulatory Area						Total
	2A	2B <sup>2</sup>	2C	3A	3B	4	
1977	13	17	72	196			298
1978	10	9	82	282			383
1979	15	18	174	365			572
1980	19	11	332	488			850
1981	19	23	318	751		12	1,123
1982	50	66	489	716		11	1,332
1983	63	103	553	945		3	1,667
1984	118	124	621	1,026		13	1,902
1985	193	525	682	1,210		8	2,618
1986	333	372	730	1,908		20	3,363
1987	446	527	780	1,989		30	3,772
1988	249	504	1,076	3,264		36	5,129
1989	327	635	1,559	3,005		24	5,550
1990	197	762	1,330	3,638		40	5,967
1991	158	584	1,654	4,236		74	6,706
1992	250	579	1,668	3,899		40	6,436
1993	246	657	1,811	5,265		72	8,051
1994	186	657	1,805	5,281		88	8,017

<sup>1</sup>Harvest estimates for 1994 are based on the last six years of harvest, except for Area 2A (California, Oregon, and Washington) and Area 2B.

<sup>2</sup>The harvest from 1993 onward is the product of the average catch in numbers between 1987 and 1992 and the average weights from Ketchikan in northern British Columbia waters and Neah Bay in southern British Columbia waters.

Testimony of Eric W. Jordan to the Advisory Panel and North Pacific Fisheries Management Council the second week of January, 1995 on halibut conservation.

Chairman Richard Lauber, Council members, Advisory Panel members, and the interested public,

I had planned to be here personally but facing a conflict between this meeting and watching my sons play basketball in Petersburg I have decided to go cheer them on.

Nevertheless I want you to know that I am deeply concerned about halibut management in the era of Individual Transferable Quotas, and a rapidly growing guided sport halibut harvest. I see and hear evidence of localized depletion in the areas I fish around Sitka. I also see other charter operators moving into offshore areas to catch halibut. They tell me it is because they cannot find halibut near town like they used to.

You should know that I do not own any halibut ITQ's. I hold a 6 pack license and do 2 or 3 halibut charters a year but make most of my income Power Trolling salmon.

Because I am concerned about localized depletion I recommend capping the guided sport catch of halibut at recent historical levels. I also recommend that the Council set in place a system to allow transfer of longline ITQ halibut to halibut sport fish guides.

This is the fairest way to allow halibut to move to the guided sport fishery if that is where they are the most valuable. Allowing the guided sport fishery to continue to expand at the expense of local abundance and vested commercial fishermen is patently unfair and serves to defeat conservation incentives for both user groups.

Sincerely,

Eric W. Jordan  
A.P. member 1978-1986

F/V Kariel  
Steve Fish  
P.O. Box 6448 Sitka, Ak. 99835

January 6, 1995

Richard Lauber, Chairman  
North Pacific Fisheries Management Council  
P.O. Box 103136  
Anchorage, Ak. 99510

Dear Chairman Lauber,

I am concerned about the rapidly expanding halibut charter fleet in the Alaskan coastal communities. The impact of this growth is having a negative impact on the traditional users of the halibut resource. The subsistence, true or unguided sport, and commercial fishermen are all feeling the pinch as the halibut charter fleet fishes with little accounting of their true catches and continues to grow without plan or consideration of other users.

As a commercial halibut fisherman since 1975, I am part of a responsible resource user group which has always initiated and supported conservative management practices for the halibut resource. With IFQ's we have taken another step toward reducing waste and improving our stewardship of this resource. It makes one wonder why a rapidly expanding group which has stubbornly avoided even an accurate accounting of the fish they are catching, and has absolutely no incentive for conservation other than unenforced bag limits, should preempt the relatively responsible commercial users as the projected sport catch comes off the top of the TAC each year.

This preemption will be felt even more with IFQ's. Before, as the halibut quota was reduced, an individual fisherman still had a good chance of making a decent season by fishing harder and increasing efficiency. Now, with individual quotas, as the TAC is carved away by the expanding charter fleet each commercial fisherman's catch is directly reduced.

The halibut charter fleet naturally targets inshore areas close to towns and with the increasing intensity of their efforts has depleted those easy-to-catch stocks at the expense of the traditional sport and subsistence users. Not only elbowed out of old favorite spots by the aggressive style and increased numbers of the charter boats, sport and subsistence fishermen are finding it hard to find fish without travelling farther from town, which many can't do with their small skiffs. Even when they can, the charter boats seem to be there first.

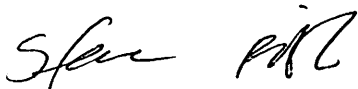
The halibut charter operators are not sport fishermen simply providing a ride to visiting sport fishermen. They are a service business with a direct stake in how much fish their clients catch. The operator, not the client, decides where to go and the style in which to fish in order to maximize the return for the client. They are commercial fishermen who in many areas are three times more efficient than their true sport counterparts.

It is a well-known fact that illegally high catches, under-reporting, and avoidance of the "creel survey" are common. The charter fleet has raised eyebrows and hackles at airline ticket counters, custom freezing services, on the docks, on the grounds, and with their own employees. It is time to shift gears from a free-for-all at others' expense to a responsible management scheme.

I urge the council to develop an effective management program for the halibut charter industry. Any plan should meet the following criteria: The plan should relieve the near-shore depletion now hurting the sport and subsistence fishermen; It should limit the amount of halibut that the charter fleet can take at the expense of the commercial fleet; and it should address the lack of hard data available on just how much fish these boats are taking.

Efforts are now being made by some more proactive charter groups to seek solutions to these problems. It is not good for our respective user groups or our towns or economies to be at each others' throats. This issue is on the table and it is time for a good-faith effort at a rational solution.

Thank You for your consideration.



1-6-95

Chairman Lauber,

I am a commercial fisherman from Sitka, AK. And I am writing this letter in regards to my concern over the growth of the charter fleet and it's inaccurate accounting of halibut landings.

Halibut fishing was, and still is, a very vital part of the economic source for communities all over Alaska. This includes Sitka.

Through good management the fishery has survived. It's had ups and downs but still an important part of the subsistence sport and commercial fishermen's harvest.

And now with I.F.Q.'s going into effect I would hope this should remain the same for years to come.

But it's been brought to my attention through a few different sources, the growth of the charter boat fleet and the growth of their catch.

One of those sources, who wishes to remain anonymous, is a charter boat operator, friend, and my summer time house-sitter during the spring and summer fishing seasons. He is a Washington resident and spends May through Sept. here.

He has told me how many, if not most, of his clients are more meat hunters.



his wishes or suggestion the clients insist on catching and keeping enough halibut to fill box after box of halibut fillets to take home.

This goes on day after day and he tells me this is common practice throughout the charter fleet. They're just trying to please their customers.

I realize this information is all second hand and no way to verify what I say is true and accurate. At least there is no way ~~at~~ at the present time that's why I would stress the boards' importance on addressing this issue. And have some sort of accurate accounting done before there is some serious damage done to the stocks.

I realize the profiting charter boat fleet has a right to access this resource as do the other commercial fishing boats. What I can't understand is why after all of the effort and time and money has gone into setting up and activating the I.F.Q. program the charter fleet may potentially be given, in time, up to 50% of the halibut quota. When a crewman or skipper of a fishing boat has to buy shares to be able to fish in this new system and then those same shares may be cut in as much as half and not by stock decline but because of growth of another commercial user group.

I hope you are able to understand and appreciate my concerns. And I hope the council acts by putting some sort of lid on the growth of this industry or at least some sort of accurate accounting of fish

# Homer Charter Association

---

P. O. Box 148 Homer, Alaska. 99603 (907) 235-2282 phone/fax.

January 11, 1995

North Pacific Fishery Management Council  
P O Box 103136  
Anchorage, AK. 99510

Mr. Chairman,  
Members of the Council,

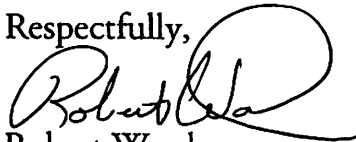
The Homer Charter Association supports option 3 and we urge the council to start the move forward so that we start catch reporting beginning in April 1995.

Without a year or two of catch reporting we can't support option 1.

The Homer Charter Association supports a 3 year regional study moratorium based on the 9/23/93 control date and we do this with the knowledge that it may become permanent rather than temporary.

In area 3A most of the sport halibut catch is by Alaskan anglers. Sure there are a lot of outside tourists who fish in area 3A but because of the access by the road system Alaskans are the majority user of the resource through charterboats in this area. We would hope the State of Alaska will take a dim view of any restrictions that limits the sportsmen of Alaska access to a public resource.

Respectfully,



Robert Ward  
Sec/Tres

January 11, 1995

North Pacific Fishery Management Council  
P O Box 103136  
Anchorage, AK. 99510

Mr. Chairman,  
Members of the Council,

I am committed to the conservation of the halibut resource. I have been a halibut charter operator in Homer for 18 years and am concerned about the viability of my fishery for the long term. I have 2 sons whom may want to enter the fishery. My concerns are that wastage in the longline fleet, the terrible bycatch problem and uncontrolled growth in my own fishery will essentially kill my livelihood.

I support a management plan that includes a moratorium on new growth. I urge the Management Council study an IFQ system for charter boats with consideration to the long time professional charter operator. I am not interested in any plan that gives away any IFQ to a speculator so I want to see 9/23/93 used as the control date.

I understand the Management Council is mandated to allocate the resource. If we don't go with an IFQ system, I would like to see the state be the micro managers. They are used to dealing with fisheries on a small regional basis.

I request that the Management Council implement a log book program in such a way that accurate catch rates can be determined starting in April 1995.

Thank You,

*Sean Martin*

THE HALIBUT CHARTER ASSOCIATION OF ALASKA

January 11, 1995

North Pacific Fishery Management Council  
P O Box 103136  
Anchorage, AK. 99510

Mr. Chairman,  
Members of the Council,

It is apparent from its wording that the Advisory Panel Problem Statement is conjecture. For example, it is stated in number one - "Pressure by charter operations, lodges and outfitters may be contributing to localized depletion." Not only is there no hard data to support this, but surely, the commercial fleet may be contributing as well. We ask that any analyses include all possible causes of the stated problems.

In addition, there are two points we wish the council to keep in mind.

1. Any action taken by the council on the halibut charter issue could have a significant impact on the public's access to the resource.
2. A charter business is by definition a service. Sport *and* subsistence fishermen hire boats and guides to transport them to fishing grounds and the fish caught by the legally licensed angler belong to the angler. This distinction will be more clearly made with the approval of the Alaska Dept of Fish and Game proposals 298 and 299 to the State Board of Fish in March 1995.

We ask the council to consider a plan that would begin with the collection of catch and effort data. Catch records as outlined by the Advisory Panel in option three (3) of their problem statement and information provided by the Dept of Fish and Game guide registration proposal will contribute a large part of this information.

A working group made up of council members, state officials and industry representatives would utilize study results to select from options such as status quo, traditional management tools applied to the recreational fishery on a regional and/or area, or a guide licensing program which could include restrictive aspects.

State proposal 299 mandates that the number of fishing lines equal the number of paying passengers and prohibits the skipper and crew from retaining fish. The Halibut Charter Association of Alaska believes that the elements in this proposal are a significant starting point in the reduction and/or stabilization of the guided recreational fishery.

Respectfully,

John Goodhand  
President

TRIBAL GOVT FOR SITKA  
SYA FEDERALLY RECOGNIZED  
HALIBUT CONCERNS

CO ORD  
SYA SUBSISTENCE COMM  
CULTURE, HEALTH  
TRADITIONAL SUBP PROGRAM

FISHING IN ALASKA IS A MATTER OF  
SUBSISTENCE + ~~TRADITION~~ HISTORY

SUBSISTENCE IS C/T C/T PRACTICES USES VALUES  
HISTORICAL IS COMMERCIAL FISHING  
THE CHARTER INDUSTRY IS NEITHER

OUR C/T WAYS HAVE EVOLVED FROM A  
WAY OF LIFE TO A LIFESTYLE.

WE RECOGNIZE OUR INBORN INHERENT  
RIGHT TO HARVEST ALL FORMS OF SUBSISTENCE  
FOODS + MEDICINES - HERBS. WE RECOGNIZE  
THESE NOW AS OUR ANCESTORS DID FOR  
THEIR QUALITIES OF PIETARY, NUTRITIONAL  
AND SPIRITUAL VALUES.

BEFORE ANY ALLOCATIONS BE MADE, WE  
WOULD LIKE TO SEE OUR CONCERNS TO BE  
ADDRESSED FIRST. REGULATIONS PUT ON  
ONE USER GROUP TO ENHANCE ANOTHER  
IS UNCONSTITUTIONAL

WE WISH FOR YOU ~~TO~~ TO  
RECOGNIZE OUR INDIGENOUS RIGHTS

TRIBAL COUNCIL HAS PASSED A  
RESOLUTION ON THE RETURN OF  
THE INDUSTRY

WE NEVER GAVE UP OUR  
ABORIGINAL RIGHTS

THERE IS A PRESIDENTIAL DOCUMENT  
WHICH URGES DEPT / AGENCIES TO WORK  
WITH TRIBAL GOV'TS

WE ARE ALSO AWAITING FOR THE  
RESULTS OF THE KATIE LUTIN CASE  
SITKA TRIBE SUPPORTED JUDGE HOLLANDS  
~~DECISION~~ RULING ON NATIVE SUBSISTENCE RIGHTS

WE HAVE GATHERED INFO FROM  
ELDERS, CARETAKERS OF KNOWLEDGE, INFORMATION  
FROM ANTHROPOLOGISTS AND ALSO FROM  
BOOKS.

WE ARE ALSO WORKING WITH  
U.S. F & W SERVICE IN DETERMINING  
C/T

## PARTICIPATION & DOCUMENTATION

WE ARE NOT SPORT OR COMMERCIAL  
MY PROGRAM PROVIDES FOR ELDERLY  
DISABLED.

PROVIDER AS APPLIED TO THE  
PROXY SYSTEM SITKA IS  
SUBSISTENCE #1 PRIORITY RURAL

THE THLINGIT Indians of Sitka  
BY GEORGE EMMONS - DE LAGUNA

SITKA TRIBE of ALASKA  
HISTORIC PRESERVATION PLAN

POSSESSORY RIGHTS OF THE NATIVES  
OF SOUTHWEST ALASKA  
BY Goldschmidt - HAAS

THE THLINGIT  
BY WALLACE M. OLSON

AN INVENTORY OF THE S.E. ALASKA NATIVE  
AUDIO-VIDEO TAPE RECORDINGS SITKA, AK  
BY S.E. ALASKA INDIAN CULTURAL CENTER

PLACE NAMES ON MAPS CHARTS

# Presidential Documents

Federal Register

Vol. 59, No. 85

Wednesday, May 4, 1994

Title 3—

The President

Memorandum of April 29, 1994

## Government-to-Government Relations With Native American Tribal Governments

### Memorandum for the Heads of Executive Departments and Agencies

The United States Government has a unique legal relationship with Native American tribal governments as set forth in the Constitution of the United States, treaties, statutes, and court decisions. As executive departments and agencies undertake activities affecting Native American tribal rights or trust resources, such activities should be implemented in a knowledgeable, sensitive manner respectful of tribal sovereignty. Today, as part of an historic meeting, I am outlining principles that executive departments and agencies, including every component bureau and office, are to follow in their interactions with Native American tribal governments. The purpose of these principles is to clarify our responsibility to ensure that the Federal Government operates within a government-to-government relationship with federally recognized Native American tribes. I am strongly committed to building a more effective day-to-day working relationship reflecting respect for the rights of self-government due the sovereign tribal governments.

In order to ensure that the rights of sovereign tribal governments are fully respected, executive branch activities shall be guided by the following:

(a) The head of each executive department and agency shall be responsible for ensuring that the department or agency operates within a government-to-government relationship with federally recognized tribal governments.

(b) Each executive department and agency shall consult, to the greatest extent practicable and to the extent permitted by law, with tribal governments prior to taking actions that affect federally recognized tribal governments. All such consultations are to be open and candid so that all interested parties may evaluate for themselves the potential impact of relevant proposals.

(c) Each executive department and agency shall assess the impact of Federal Government plans, projects, programs, and activities on tribal trust resources and assure that tribal government rights and concerns are considered during the development of such plans, projects, programs, and activities.

(d) Each executive department and agency shall take appropriate steps to remove any procedural impediments to working directly and effectively with tribal governments on activities that affect the trust property and/or governmental rights of the tribes.

(e) Each executive department and agency shall work cooperatively with other Federal departments and agencies to enlist their interest and support in cooperative efforts, where appropriate, to accomplish the goals of this memorandum.

(f) Each executive department and agency shall apply the requirements of Executive Orders Nos. 12875 ("Enhancing the Intergovernmental Partnership") and 12866 ("Regulatory Planning and Review") to design solutions and tailor Federal programs, in appropriate circumstances, to address specific or unique needs of tribal communities.



The head of each executive department and agency shall ensure that the department or agency's bureaus and components are fully aware of this memorandum, through publication or other means, and that they are in compliance with its requirements.

This memorandum is intended only to improve the internal management of the executive branch and is not intended to, and does not, create any right to administrative or judicial review, or any other right or benefit or trust responsibility, substantive or procedural, enforceable by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

The Director of the Office of Management and Budget is authorized and directed to publish this memorandum in the Federal Register.

*William Clinton*

THE WHITE HOUSE,  
Washington, April 29, 1994.

[FR Doc. 94-10877  
Filed 5-2-94; 3:49 pm]  
Billing code 3110-01-M

Editorial note: For the President's remarks to American Indian and Native Alaska tribal leaders see the *Weekly Compilation of Presidential Documents* (vol. 30, issue 18)

**Sitka Tribe of Alaska - Tribal Government for Sitka, Alaska  
456 Katlian Street - Sitka, Alaska 99835**

**Tribal Council Resolution 94-44**

Supporting the regulation of the halibut charter industry

**WHEREAS,** The relationship between the Native people of Southeast Alaska and the resources of the land and sea is so close that an entire culture is reflected in the traditional laws passed on from generation to generation which mandate conservation and the perpetuation of subsistence resources.

**WHEREAS,** halibut, among other species of fish, is undeniably a customary and traditional food of the Alaska Native people in Southeast Alaska as evidenced by such ancient and ingenious inventions as the Alaska Native halibut hook.

**WHEREAS,** the subsistence living of Native people of Southeast Alaska is threatened by over harvesting, waste, and mismanagement of the land and sea resources and disregard for the governmental authority of the Tribe to manage these resources.

**WHEREAS,** the ever increasing levels of harvest by halibut charter industry is a prime example of the over harvesting, waste, and mismanagement of subsistence resources.

**WHEREAS,** the halibut charter industry purports to be "non-commercial" when it is obvious from the number of profitable business enterprises supporting the industry, the huge numbers of fish taken by the industry, and the eventual sale of much of the charter industry's halibut catch to commercial processors that the halibut charter industry is "commercial."

**WHEREAS,** this growth and lack of regulation of the halibut charter industry directly and adversely affects the halibut subsistence fishery by overcrowding traditional fishing sites and over-harvesting the halibut populations and will destroy the subsistence fishery if left unchecked.

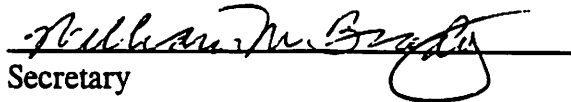
**NOW THEREFORE BE IT RESOLVED** that the Tribal Council of the Sitka Tribe recommends that the North Pacific Fishery Management Council adopt a management plan for the halibut charter fishery at the January 1995 meeting which 1) Classifies the charter fishery as a "commercial" fishery; 2) Sets a cap limit on the take by the halibut charter fishery that protects the subsistence fishery; 3) Adopt any other necessary rules, regulations, and restrictions to effectively manage the halibut charter fishery.

CERTIFICATION

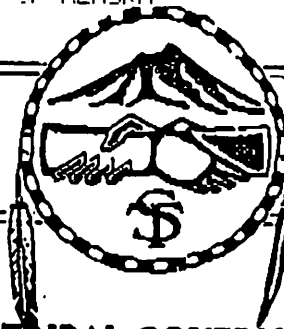
The foregoing resolution was adopted at a duly called and convened meeting of the council of the Sitka Tribe of Alaska held on December 21, 1994, at which a quorum was present, by a vote of 5 IN FAVOR, 0 AGAINST, and 4 ABSENT.

  
Chairman

Attest:

  
Secretary

**Sitka Tribe of Alaska**  
Tribal Government for Sitka, Alaska



456 Katlian Street • Sitka, Alaska 99835  
(907) 747-3207 • 1-800-746-3207  
FAX 907-747-4915

Design by Albert A. Hida

**SITKA TRIBE OF ALASKA • TRIBAL GOVERNMENT FOR SITKA, ALASKA**

456 Katlian Street • Sitka, Alaska 99835  
Tribal Council Resolution 94-14

Support for Judge Holland's Ruling on Native Subsistence Rights  
in Katie John v. U.S.

WHEREAS, The protection and integrity of subsistence rights are essential to the physical, economic, traditional, cultural and sovereign political existence of Alaskan Natives as a people,

WHEREAS, The State of Alaska under the Hickel administration has continually and expressly disregarded the sovereignty and subsistence rights of Alaskan Native governments by mismanaging subsistence fishing on public lands and waters,

WHEREAS, Katie John and Doris Charles, among others, challenged these illegal state actions in federal court and were vindicated when Judge Holland issued a principled decision honoring Alaskan Native subsistence rights in Katie John v U.S. (A-90-0-484 Civ.),

WHEREAS, The Sitka Tribe of Alaska, hereinafter referred to as STA, being a sovereign nation, asserts self-determination, exercises powers and privileges to promote the welfare of tribal members on local, federal, and state issues which may affect the welfare of tribal citizens,

BE IT RESOLVED, STA declares its support for the principled decision in Katie John v. U.S. because it properly interprets federal and tribal law honoring subsistence rights and tribal sovereignty,

BE IT FURTHER RESOLVED, STA will file suit in support of Katie John and Doris Charles in an amicus brief if the State of Alaska appeals Katie John v. U.S. to the 9th Circuit Court of Appeals.

**CERTIFICATION**

The foregoing resolution was adopted at a duly called and convened meeting of the Tribal Council of the Sitka Tribe of Alaska held of April 13, 1994, at which a quorum was present, by a vote of 8 IN FAVOR, 2 AGAINST, and 1 ABSENT.

Attest:

*Jessica Dutey*  
Secretary

*James A. Williams*  
Chairman

## Subsistence Program

### Key:

1: Fresh	A: Baked
2: Frozen	B: Fried
3: Canned	C: Boiled
4: Smoked	D: Barbeque
5: Pickled	E: Deep Fried
6: Raw	F: Steamed
7: Salted	G: Flavoring
8: Dried	H: Juice
9: Indian	I: Fireside Roasting
10: Corned	J: Minced
11: By-products	

### Spring:

SEAL 1,2,3,4,11,B  
SEA WEED 1,4, 8,C  
RED RIBBON 1,4,8,B  
CLAMS 1,2,B,F,G,H,J  
COCKLES 1,2,4,F,G,H,J,  
GEODUCKS 1,B,F,J,  
MUSSELS 1,10, F  
SHRIMP 1,2,E,F  
SEA CUCUMBER 1,C,B,J  
STEAMER CLAMS 1,4,6, B,F,  
SMELT 1,3,4,B  
HERRING 1,5,B,C  
HERRING EGGS 1,2,6,7,8,C  
KING SALMON 1,2,3,4,5,8,9,A,B,C,D .  
STEELHEAD 1,2,4,9,A,B,D  
DOLLY VARDEN 1,2,4,A,B,D  
HALIBUT 1,2,3,8,A,B,C,D,E  
LING COD 1,2,A,B,E,  
ROCK FISH 1,2,A,B,C,E  
BLACK COD 1,2,4,7,C,F  
GROUSE 1,2,A,B  
SEA OTTER 11

**Key:**

1: Fresh	A: Baked
2: Frozen	B: Fried
3: Canned	C: Boiled
4: Smoked	D: Barbeque
5: Pickled	E: Deep Fried
6: Raw	F: Steamed
7: Salted	G: Flavoring
8: Dried	H: Juice
9: Indian	I: Fireside Roasting
10: Corned	J: Minced
11: By-products	

**SUMMER:**

SEAL 1,2,3,4,11,B  
SEAGULL EGGS 1,C  
SEA URCHIN 1,6  
BERRIES: SALMON, BLUE, HUCKLE, GOOSE, CURRANT, THIMBLE, GRAY: 1,2,6  
KELP 1,5  
SHRIMP 1,2,E,F  
ABALONE 1,2,B,F,J  
GUMBOOTS 1,2,5,F,J  
CHINA SLIPPER 1,6  
ROCK SCALLOP 1,6,F  
RAZOR CLAM 1,2,B,F  
SALMON EGGS 1,2,3,C,G  
KING SALMON 1,2,3,4,5,6,7,8,9,10,A,B,C,D  
SOCKEYE 1,2,3,4,8,10,A,B,C,D  
PINK 1,2,3,4,8,A,B,C,D  
SILVER 1,2,3,4,8,A,B,C,D,  
CHUM 1,2,3,4,8,10,A,B,C,D  
HALIBUT 1,2,3,4,8,A,B,C,D,E  
LING COD 1,2,A,B,E  
ROCK FISH 1,2,A,B,C,G  
OCTAPUS 1,5  
SEA OTTER 11

**Key:**

1: Fresh  
2: Frozen  
3: Canned  
4: Smoked  
5: Pickled  
6: Raw  
7: Salted  
8: Dried  
9: Indian  
10: Corned  
11: By-products

A: Baked  
B: Fried  
C: Boiled  
D: Barbeque  
E: Deep Fried  
F: Steamed  
G: Flavoring  
H: Juice  
I: Fireside Roasting  
J: Minced

**FALL**

DEER 1,2,3,4,10,11,A,B,C,D  
SEAL 1,2,3,4,11,B  
STEAMERCLAMS 1,4,6,B,F  
CLAMS 1,2,B,F,G,H,J  
COCKLES 1,2,4,F,G,H,J  
GEODUCKS 1,B,F,J  
MUSSLES 1,10,F  
SHRIMP 1,2,E,F,J  
CRAB 1,2,F,J  
KING SALMON 1,2,3,4,5,6,7,8,9,10, A,B,C,D  
SALMON EGGS 1,3,C,G  
SILVERS 1,2,3,4,8,A,B,C  
CHUM 1,2,4,8,A,B,C,D  
HALIBUT 1,2,3,8,A,B,C,D,E  
BLACKCOD 1,2,4,7,C,F  
ROCK FISH 1,2,A,B,E  
SEA OTTER 11

**Key:**

1: Fresh  
2: Frozen  
3: Canned  
4: Smoked  
5: Pickled  
6: Raw  
7: Salted  
8: Dried  
9: Indian  
10: Corned  
11: By-products

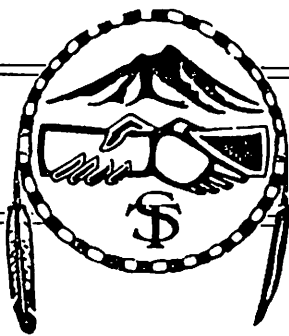
A: Baked  
B: Fried  
C: Boiled  
D: Barbeque  
E: Deep Fried  
F: Steamed  
G: Flavoring  
H: Juice  
I: Fireside Roasting  
J: Minced

**WINTER**

DEER 1,2,3,4,10,11,A,B,C,D  
SEAL 1,2,3,4,B  
CLAMS 1,2,B,F,G,H,J  
COCKLES 1,2,4,F,G,H,J  
GEO DUCKS 1,B,F,J  
MUSSELS 1,,10, F  
SHRIMP 1,2,E,F,J  
CRAB: BOX TANNER, DUNGENESS 1,2,F,J  
STEAMER CLAMS 1,4,6,B,F,J  
SMELT 1,3,4,B  
HERRING 1,5,B,C  
KING SALMON 1,2,3,4,5,6,7,8,9,A,B,C,D  
HALIBUT 1,2,3,8,A,B,C,D,E  
LING COD 1,2,A,B,E  
ROCK FISH 1,2,A,B,C,E  
HUDSON BAY TEA 1,8  
SEA OTTER 11



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Tribal Government for Sitka, Alaska



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Design by Albert A. Nells

The Sitka Tribe of Alaska Health Committee is comprised of STA Tribal Council members, STA staff, representatives from the Sitka Pioneers Home, Sitka Senior Center, SEARHC, and concerned and knowledgeable citizens from the Sitka community. These members together recognize the value and importance of traditional subsistence foods for their quality of dietary, nutritional, and spiritual well-being.

As the STA Health Committee, we are in business to ensure that each Native member of the Sitka community have available to them, healthy dietary and lifestyle options from which to choose from. We recognize that since it has been difficult for many communities, families, and individuals to maintain a subsistence food diet, and have had to turn to store-bought processed foods, significant health problems have developed among our Native population. Heart disease, diabetes, and hypertension have increased at distressing rates, due in large part to the processed and high cholesterol diets found in stores today.

As our Native people prefer traditional foods for taste and health, we support the right of our Native citizens to harvest all forms of subsistence foods, including salmon, bottomfish, rockfish, cod, aquatic plants, shellfish, birds, animals, mammals, berries, and herbs of medicinal value. As our ultimate goal is to have our Native people be allowed to achieve a healthy lifestyle, we see our convenient access to these foods as critical.

If you have any questions or comments regarding our activity as a Health Committee, please feel free to contact me in Sitka.

Sincerely,

A handwritten signature in cursive script that reads "Terry K. Baines".

For the STA Health Committee  
Terry Baines, Project Director for STA Health Program

Sitka Tribe of Alaska  
Job Description  
Department of Social Services

**Position Title:** Traditional Foods Program Coordinator

**Supervisor:**

**Salary range:**

**Status:**

**Hours:**

**Job Description:**

Preserve and pass on knowledge of customary and traditional foods through identifying, gathering, harvesting, processing, putting up and disbursing to various individuals and agencies within the Sitka Tribe and others.

**Job Duties:**

1. Attend meetings and conferences pertaining to Customary Traditional Foods.
2. Advocate for Customary Traditional Foods gathering rights.
3. Create and maintain list of seasonal traditional foods and methods of putting up and preparing them.
4. Maintain donation list of individuals, groups, and agencies.
5. Work with eligible GA recipients for assistance with putting up and dispersing foods.
6. Document harvesting, processing, and disbursing through photographs and statistics of traditional foods gathered.
7. Gathering and preparing foods using youth and adults in the community to teach them traditional harvesting methods. Youth are not limited to STING and UNITY members.
8. Prepares monthly reports as required.
9. Handles other duties as assigned by Director of Social Services or General Manager or Chairman.

**Qualifications:**

High school diploma or equivalency required. Extensive knowledge of Traditional foods is necessary.

3/94

**To:**

**Date:**

**From:** Helen Hooper Drury, R.D., M.S.

**Subject:** Native Foods

The mission of the Southeast Alaska Regional Health Corporation is to improve health status, promote health awareness and encourage healthy lifestyle choices of the people of Southeast Alaska...

The role of the Nutrition Services department of SEARHC in that regard is to ensure that the people of Southeast Alaska are aware of proper dietary choices, both within the hospital and community setting, with cultural relevancy. We have worked closely with the Sitka Tribe of Alaska in identifying and analyzing traditional subsistence foods for nutritional value and the importance of these foods to the well being of the consumer.

SEARHC Nutritionists are presently very concerned by the alarming increase in diabetes, heart disease and hypertension among the Native population. This can be attributed to their increased consumption of "white man's foods" (i.e. highly processed foods as well as the high cholesterol meats). Native people prefer their traditional foods and all attempts should be made to encourage and enable their consumption.

I, as a Nutritionist at SEARHC, feel it critical that the Native members of the Southeast communities be given a healthy choice when it involves their diet and general lifestyle. I support STA's efforts in re-establishing what has been a long-standing Native tradition - the enjoyment of a healthy, subsistence diet.