

12/22

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: Cba - Halibut Catch ~~2012~~ 2012

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	SEAN MARTIN	North Country CHARTERS
2	GARY AULT	HOMER CHARTER ASSOCIATION
3	Gerri Martin	North self
4	Linda Behrken	ALFA / Halibut Coalition
5	Ricky Geese	KRST
6	Tom Ohaus	Self
7	Candyn Nichols	Self
8	Rhonda Hubbard	Self
9	Stan Malcom	Petersburg Charterboat Assoc
10	Ken LARSON	PWSCBA
11	ANDY MEZROW	SEWARD CHARTERBOAT ASSOCIATION
12	B. Alveon-Sack/Knutson	FVUA-Seattle
13	JOEL HANSON	THE BOAT COMPANY
14	GREG SUTER	ACA
15	Jim Norris	Self
16	Ken Simpson	FV / Lady Simpson
17	Bruce Gabrys	3A
18	Carl Hughes	Aurora Charters
19	Cassie Malone	Self
20	Heath Hilyard	SEABO
21	Wancy Hillstrand	Pioneer Alaska Fisheries
22	Daniel Donich	Daniel's Personalized Guide Service
23	Jim MACKOWAK	SELF
24	Steve Fish	self
25	Malcolm Mike	NPFA

THIS IS ONLY DAY I CAN TESTIFY 12/10

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-6a Halibut ~~CSR~~ 2012

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Art Nelson	self
2	Jeff Stephan	UFMA
3	Kathy Hansen	SEAFA
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December 6, 2011

Eric Olson, Chair
North Pacific Fishery Management Council
Re: Halibut Catch Sharing Plan

Dear Chairman Olson and NPFMC Members:

We, the undersigned residents of Gustavus, Alaska, ask the NPFMC to consider the points below in deliberations regarding the harvest of halibut and regulation of the guided charter industry. Please understand that we do not favor any user group over another. Rather, we support regulation of all users in a fair and equitable manner to foster the health of the halibut resource. With that goal, we generally support the proposed Catch Share Plan (CSP), with the following reservations:

- With the plan that would allow charter operators to lease commercial IFQ, care must be taken to avoid creating a situation that intensifies the charter fishing effort in areas that produce large fish. The average size of halibut caught in the Glacier Bay/ Icy Strait area is substantially greater than the Southeast Alaska (Regulatory Area 2C) average. Data collected by ADF&G in 2010 showed the average halibut caught in Glacier Bay/Icy Strait to be 47.4 pounds, compared to 26.4 pounds for Area 2C. The proposed method of converting leased IFQ pounds to numbers of Guided Angler Fish (GAF) - dividing IFQ pounds by the Southeast average weight - would allow more pounds to be caught in the Glacier Bay/ Icy Strait area than elsewhere. This is especially true because clients harvesting leased IFQ would be allowed the private sport limits of two fish per day of any size. We ask that you revise the IFQ/GAF conversion formula and regulations to assure that the allowable harvest of GAF in pounds is equivalent to the leased IFQ pounds.
- We support the continuance of the one-fish daily bag limit and a maximum size limit for guided charter operators as regulations that have kept this sector within its Guideline Harvest Limit.
- The proposed CSP calls for over-harvests incurred by guided charter operators to be subtracted from both the commercial and guided charter catch quota for the following year. This is unfair. Since the implementation of the halibut IFQ system in 1995 there have been no significant catch overages by the commercial halibut fishery. The charter industry must be responsible for its own excesses over its catch quota. Moreover, an estimate of mortality of released fish should be counted as part of the charter catch, just as it is for the commercial catch.

We are also deeply concerned about the burgeoning "self-guided" subset of the charter industry in our area. International Pacific Halibut Commission biologists warn that halibut stocks are in decline coast-wide, especially in terms of size for age. The large fish available in this area are, for the most part, important breeding females. A one-fish daily bag limit and maximum size limit for these nominally self-guided fishers is needed to protect this important resource.


Thank you for your consideration.


Name (print)


Address

Signature

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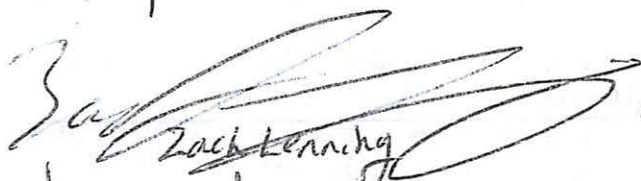
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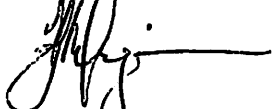
AURIE ROSS 45 GUSTAVUS, AK. 99826


Name(print)

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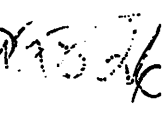
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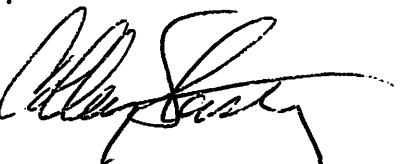
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ROBERT E CHASE	P.O. BOX 206 GUSTAVUS, AK, 99826	Robert E Chase
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Jim Mackovjak " " " " Jim Mackovjak



Eric Olson, Chair
North Pacific Fishery Management Council
Attn: Chris Oliver, Executive Director
604 West 4th Avenue, Suite 306
Anchorage, AK 99501
re: Comments on agenda item C-6(a)

December 10, 2011

Chair Olson and Members of the Council:

I appreciate the opportunity to provide comments in response to the information by the International Pacific Halibut Commission (IPHC) and the Alaska Department of Fish Game (ADF&G) regarding the 2012 staff recommendations and the 2010/2011 sport catch estimates.

My comments address those items while offering how that information influenced the deliberations of the 2C members of the Charter Management Implementation Committee.

On behalf of SEAGO and charter operators throughout Southeast Alaska, we are encouraged by the numbers reported in the IPHC staff recommendation. While the abundance increases in Area 2C are modest, they are encouraging. This improvement allowing for an increase in our Guideline Harvest Level (GHL) to 931,000 lbs. is of particular interest to our operators. After a difficult season in 2011, the prospect of an increased harvest and a liberalized management measure for 2012 have provided our operators some hope of survival and eventual recovery.

We appreciate ADF&G's ongoing work to provide timely and thorough data used to make critical management decisions. More specifically, Mr. Meyer's paper on management options for 2012 was very useful for committee members and the industry as whole to select the best management option. One aspect of Mr. Meyer's paper that causes some concern is the most conservative management scenario that assumes both 45,338 fish and a 20% high-grading rate. We believe the total number of fish caught will decline or remain steady. We understand that Mr. Meyer was providing various models, however we believe that model may be unnecessarily conservative.

This brings me to another point. Some have argued that because there was a slight increase in the total number of fish harvested between 2010 and 2011, that the 37" rule had no effect on angler interest or effort. That suggestion demonstrates a lack of understanding of our industry. If that were the case, operators would not be reporting 20% - 60% declines in their business. What operators have anecdotally reported are anglers, being limited to one small fish per day, generally made a point to catch fish at every opportunity. This differs from previous years when clients were often satisfied to retain fewer fish of a larger size. We are working with ADF&G to capture data on fishing license sales and angler days to provide data to support this theory.



As was presented in the staff report regarding the deliberations of the Charter Management Implementation Committee, the Area 2C members made three recommendations, in order of preference, for the 2012 fishing season. Those are:

- 1) **Day of the week closure** – The committee members recommended a “one-day-a-week” closure on the day that provided the greatest conservation benefit. According to the analysis provided by Mr. Meyer, a Tuesday closure would provide the greatest conservation benefit.
- 2) **Reverse Slot Limit** – A reverse slot limit was the second preference of the SE members. Under the most liberal assumptions the reverse slot limit would be U45/O58 and under the most conservative assumptions U45/O66. Based on input from operators the committee members stipulated that the maximum size for the lower slot should not be smaller than 45”.
- 3) **Maximum Size Limit** – While area operators are concerned about establishing a precedent of being managed under a maximum size limit rule, because size changes annually become increasingly difficult for our industry, we believe that a maximum size limit of a sufficient size (at or about 55”), under certain circumstances could be a reasonable option for the short term.

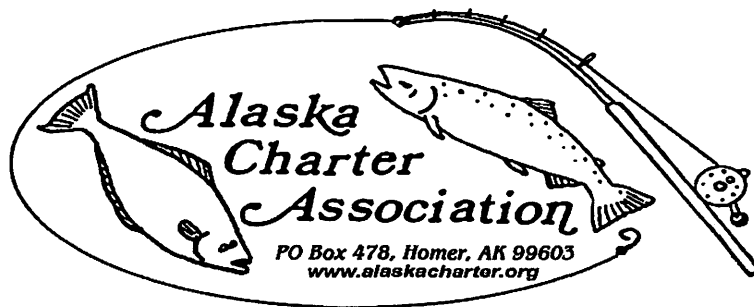
I may provide additional comments on these recommendations under agenda item C-6(b).

Thank you for your time and I appreciate this opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath E. Hilyard". The signature is written in a cursive, flowing style.

Heath E. Hilyard, Executive Director
SEAGO



"To Preserve and Protect the Rights and Resources of Alaska's Sport Fishermen"

December 12, 2011

Re: NPFMC/Agenda item C-6(a)/2012 IPHC Management measures

Dear Mr. Chair,

I am Greg Sutter, president of the Alaska Charter Association (ACA) which is a statewide organization representing over 170 charter and associated businesses. Our mission is to preserve and protect the fishing rights and resources necessary for the Alaskan charter fleet to best serve the recreational angling public.

First and foremost, I wish to commend this Council for creating the Charter Management Implementation Committee, and commend the Council for appointing Mr. Ed Dershum as its Chair. It is a vital step to gaining the input and pertinent information from operators most affected by any regulatory change. This body will assist in achieving the goal of determining the proper recommendations that will likely maximize access to our halibut resource, best preserve existing business models, while maintaining harvests below the established allocation. Thank you for your foresight in establishing this committee.

Based on this committee's findings, ADF&G reports and inputs from our members, the ACA recommends harvest management measures for areas 2C and 3A as follows:

2C/Southeast:

- 1) **Reverse Slot Limit:** One fish under 45" or one fish over 64"

It is our *preferred alternative* consisting of the more conservative "20% high-grading" approached coupled with targeting 90% of the 931,000 pound allocation.

- 2) **Fifty-inch Maximum Size:** One fish under 50"

This also contains a conservative approach of targeting 90% of our allocation.

3A/Southcentral

- 1) **Two fish of any size**
- 2) **Limitations on skipper/crew fish for a portion or all the season.**
- 3) **Annual bag limit**



PO Box 2850, Valdez, Alaska 99686

7 December, 2011

Mr Eric Olson & North Pacific Fishery Management Council
605 West 4th Avenue, Suite #306, Anchorage, AK 99501

RE: NPFMC Agenda Item C-6 Halibut Catch Share Plan (CSP)

Dear Chairman Olson & Members of the Council:

PWSCBA is a small organization of Valdez and Whittier Halibut Charter operators that has experienced a major drop in membership due to the ever-increasing restrictions on the Charter Fleet. In Valdez alone, we have dropped to approximately 12 Charter Halibut Permit operators in 2011, from over 30 operators prior to 2006, and it's still declining as CHP's are denied, or sold and moved.

IPHC's recent admission, that their "retrospective mis-estimations" in their COMFish halibut catch model and the occurrence of "unspecified mortality" may lead to further drops in the 2012 or 2013 Catch Limits, is an understatement! The Halibut Charter Fleet (what little remains of us) is alarmed at any further sport fish restrictions contemplated by IPHC & NPFMC. NOAA's September 2011 decision to delay implementation of a CSP was a reasonable one and should be made permanent, or at least not advanced to a final rule until the many NOAA-identified CSP shortcomings, including allocation incompleteness, can be corrected or eliminated. You need to look at Area 2A's CSP as a much better example of a fair allocation for ALL stakeholders.

The 3A charter fleet has already borne way more than their fair share of cuts in the fishery, as evidenced by the fact that we continue to remain well under our 3.65 Mlbs GHL that was forced on us in 2003. The 2C charter fleet has also already borne draconian cuts to get within their declining GHL. We have also seen our charter fleet forcibly reduced by 35-40% via the Halibut Charter LEP system in 2011. Statewide, a significant number of 2011's CHP's were interim ones on appeal, many of them with 4 Angler Endorsements, and about 2/3rds of those have been denied by NMFS and those operators will be gone in 2012. Can COMFish say the same in light of 2011 being the FIRST year that their Catch Limits actually fell below their 1995 IFQ-issuance Catch Limits?

As a result, we, along with non-guided sport fishermen, should be allowed to retain a two-fish/day limit in Area 3A, along with supporting the following options (until the fishery shows meaningful recovery), with COMFish forced to take more cuts for biological concerns: 1) Continue the GHL program in lieu of the CSP; 2) Establish annual limits of 4 to 8 halibut/angler, to include skipper and crew; 3) Include the non-guided sector into the allocations, with a corresponding rise in our GHL; 4) Eliminate the proposed GAF program as it's totally unworkable and unrealistic; 5) Include a Compensated Buy-back program to re-allocate COMFish IFQ to the Sport and Subsistence sector; In addition, increased enforcement action on trawl and long line operators, as well as "outlaw charter operators", is imperative. Thank you for your consideration.

Ken L Larson
Secretary, PWSCBA

Ken L Larson, Capt, Sanity Charters
1074 Eliz Street, North Pole, AK 99705
(907) 255-2798
larsen_ken@hotmail.com
7 December, 2011

Mr Eric Olson & North Pacific Fishery Management Council
605 West 4th Avenue, Suite #306
Anchorage, AK 99501

RE: NPFMC Agenda Item C-6 Halibut Catch Share Plan (CSP)

Dear Chairman Olson & Members of the Council:

I am a small Halibut & Salmon Charter & Lodge Operator out of Valdez, Alaska, operating there since 1993. IPHC's very recent admission that their "retrospective mis-estimations" in their halibut catch model and that the occurrence of "unspecified mortality" may lead to further drops in the 2012 or 2013 Catch Limits to possibly 15 Mlbs (down from 41 Mlbs in 2011), is an obvious understatement! The Halibut Charter Fleet (what little remains of us) is alarmed at any further sport fish restrictions contemplated by IPHC & NPFMC, like what is proposed in the CSP. Please remember that COMFish's 2011 41.05 Mlbs Catch Limit was the first year that it was actually lower than 1995's 48.42 Mlbs Catch Limit, when IFQ's were first implemented.

NOAA's September 2011 decision to delay implementation of a Catch Share Plan was a good one and should be made permanent, or at least not advanced to a final rule until the many NOAA-identified CSP shortcomings, including allocation incompleteness, can be corrected or eliminated. By comparison, Area 2A's CSP does provide an allocation plan for ALL stakeholders, although it's a much smaller fishery like where we seem to be headed in 2C and 3A.

Over the past 20+ years the COMFish fleet has used their undue influence in IPHC and NPFMC for continuous attacks on the Halibut Charter Fleet as a SMOKE SCREEN to cover up their egregious over fishing and ByCatch and Wastage of the halibut resource. We guided and non-guided sports fishermen have pointed this out time and again and our concerns have fallen on deaf ears. The COMFish Fleet has historically and unfairly controlled approximately 85-90% of the annual halibut catch while they have continued to further limit the 10-15% catch that sport and subsistence fishermen have been forced to accept. Despite the Charter Fleet's continued requests for IPHC and NPFMC to do something to limit the grossly under-reported COMFish ByCatch and Wastage as well as other "unspecified mortality" the COMFish industry has decimated the Halibut Fishery to the point now where they can no longer hide their actions and must bear the brunt of any further restrictions.

The 3A charter fleet has already borne way more than their fair share of cuts in the fishery, as evidenced by the fact that we continue to remain well under our 3.65 Mlbs GHL that was forced on us in 2003. The 2C charter fleet has

also already borne draconian cuts to get within their declining GHL. We also received no increased daily limits during the 2001 - 2005 peak Catch Limit years, while COMFish has been enjoying record profits due to substantial increases in their ex-vessel prices of 20+%/year since 1995. We have also seen our charter fleet forcibly reduced by 35-40% via the Halibut Charter LEP system in 2011.

We, along with non-guided sport fishermen, should be allowed to retain our two-fish/day limit in Area 3A, along with considering the following options (until or if the fishery shows meaningful recovery), with COMFish forced to take any more cuts for biological concerns: I support: 1) Continue the GHL program in lieu of the CSP; 2) Establish annual limits of 4, 6 or 8 halibut, to include skipper and crew--that would put us on a par with the COMFish fleet who have enjoyed "Home Pack" allowances in both the Salmon and Halibut Fisheries; 3) Include the non-guided sector into the allocations, with a corresponding rise in our GHL; 4) Eliminate the proposed GAF program as it's totally unworkable and unrealistic; 5) Include a Compensated Buy-back program to re-allocate COMFish IFQ to the Sport and Subsistence sector; 6) Limit Charter Operators to the same number of trips/day, as demonstrated by their use prior to 2006.

In addition, increased enforcement action on trawl and long line operators, as well as "outlaw charter operators", is imperative. A serious reduction in trawler fleets and/or their catch to ensure ByCatch and Wastage elimination is critical. Common sense and anecdotal evidence leads to the conclusion that recently prosecuted illegal over harvesting was NOT just a onetime occurrence by the COMFish fleet, just that someone was finally caught! In addition, common sense would indicate that to move the quantities of illegal catch involved, it would take participation by other fish processors and retailers, which needs to be investigated. While I believe the vast majority of the Charter and COMFish fleets have tried to play by the rules, a few unscrupulous individuals within the fleets have caused the problems. Again, common sense dictates that when you control 85-90% of the catch, you should bare 85-90% of the cuts!

Thank you for the opportunity to provide my comments on this critical issue.



Ken L Larson

Mr. Eric Olson & North Pacific Fisheries Management Councilors
605 West 4th Avenue, STE #306
Anchorage, Alaska 99501
Re: Agenda Item C-6 Halibut Catch Sharing Plan

Dear Chairman Olson and esteemed members of the NPFMC,

I own a charter business and strongly OPPOSE the current Catch Sharing Plan (CSP). The allocation levels proposed are not fair or equitable. The proposed levels substantially reduce catches for guided anglers at all but the highest levels of abundance. If a rule is to be adopted in the interest of conservation, it is important for all sectors to equally share in those increases or reductions. This includes commercial, subsistence and recreation (which include charter businesses).

I also have problems with delegating authority to set annual bag and size limits to the International Pacific Halibut Commission (IPHC). In my opinion, an international agency should not be able to determine domestic allocation levels.

Furthermore, as has been stated many times, there simply has not been a recent economic analysis to show the impact that the CSP will have on individual charter operators or the communities and businesses dependent on them. Basing a rule of this magnitude on insufficient and outdated economic analysis is simply unacceptable. Businesses and communities will be adversely impacted if this goes through as proposed.

The Guided Angler Fish (GAF) provision appears overly complicated and problematic. There is a basic unfairness in requiring the charter sector, and their clients, to lease back fish taken from them under this allocation methodology. My understanding is that in Area 3A, it will become virtually impossible to properly account for a GAF versus a fish caught under the regular allocation.

Finally, I am concerned what this policy will mean in terms of public safety. It stands to reason that these restrictions on the charter sector will promote increased unguided fishing. I am concerned that sport fishermen will choose to fish unguided, because of these limits, and go out in unsafe boats, unprepared for the rigors and risks of fishing on the open water. The charter sector allows access to the halibut resource in a safe and highly-regulated fashion.

Thank you for the opportunity to provide my comments on this important issue.

Sincerely,
David B. Goldstein, dba Prince William Sound Eco-Charters

David B. Goldstein

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