

**Comments on NPFMC Public Review Draft of EA/RIR/IRFA of
Management Measures to Implement a Guideline Harvest**

by

Robert J. Johnston

Jon G. Sutinen

Department of Environmental and Natural Resource Economics

University of Rhode Island

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The Halibut Coalition

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Introduction

This second draft of the NPFMC's Public Review Draft of EA/RIR/IRFA is much improved. It contains more information and analysis, and it provides a more complete analysis of the expected effects of the proposed regulations. Despite these improvements, this version of the report can still benefit from further revisions and extensions. We detail below some of the more important shortcomings and recommend ways in which the economic analysis can be improved.

Before discussing the report's shortcomings, we would like to acknowledge the constraints of limited time and information that the Council staff has faced in putting together this report. As is the case in most Fishery Management Councils, the staff often is required to produce analysis under almost impossible conditions. Our purpose here is *not* to impugn the competence or motives of the staff members who produced this report. Rather, our purpose is to improve the value of this report as a policy tool. We recognize that the preparation of EAs, RIRs and IRFAs for fisheries management is an evolving skill. With the changes we recommend below, we believe that this report can come closer to becoming a useful decision-support document.

General comments

There are two basic management decisions under consideration and two associated sets of economic information. The first basic management decision is whether to implement a guideline harvest level (GHL). The second basic management decision is what management measures to implement in order to achieve or comply with the GHL.

The first decision – whether to implement an GHL – should consider the marginal (incremental) economic gains and losses that are expected to occur if (i) the GHL were implemented and (ii) if it were not implemented. Implementation of the GHL will generate marginal benefits to the commercial sector (in the form of losses avoided by limiting harvests of an otherwise expanding recreational sector), and limit gains to or impose losses on the charter boat sector. The extent of the losses imposed on the charter boat sector will, of course, depend on what management measures are implemented.

The report should explain to readers that it is these marginal or incremental values that should, ideally, be estimated, and explain the implications of marginal values for each of the two basic management decisions noted above. As a general rule, most useful information for decision-making concerns marginal values, not total values. It is not relevant whether one sector of the fishery is more valuable *in total* than another when examining the proposed alternatives. Instead, it is the marginal or incremental effects of the alternative—the change in total values that would occur as a result of a policy alternative. Unfortunately, the size of marginal or incremental effects may not be correlated or related to the size of the baseline (original) total value. Accordingly, relying on total baseline values (or economic benefits) as an indicator of the economic consequences of policy changes can result in highly misleading results.

The Draft EA/RIR/IRFA presents data concerning both marginal and total economic outcomes. The most prevalent is information indicating the *current status* of expenditures and/or benefits associated with the charter and commercial halibut sectors—or total values. This information is

useful as background context, from which one may gain a general understanding of each sector.¹ Although its presence is required in fishery EA/RIR/IRFA reports, this first type of information provides nothing that allows one to forecast the impact of policy changes on expenditures or net benefits. The second type of presented economic information illustrates the marginal impact of policy changes—it indicates the changes in economic expenditures or net benefits that are expected if allocation or harvest policies are changed in a particular manner. The report provides much less of this type of information, in large part due to a lack of necessary data. Although this type of information is much less common in the report, where it is present, it is critical that it be accurate, reliable, valid, and interpreted properly.

Policy Issues and Implications for Appropriate Economic Analysis

As explained above, the relevant decision context is that the implementation of a policy alternative will result in *incremental (marginal) economic gains or losses* for the commercial and charter sectors of the fishery. A comprehensive economic analysis, at its best, would estimate the magnitude of the expected gains and losses and forecast how those gains and losses would be distributed throughout the fishery and the rest of society.

For each decision alternative and management option, the report should specify the relevant incremental gains and losses that need to be estimated. If adequate data and analysis are not available for such estimation, simply state that as the case. Nonetheless, the report should make clear that the most critical pieces of economic information for policy decisions characterize incremental *changes* in economic benefits that result from various policy options. Note also that the size of these incremental changes need not be related to the magnitude of current total economic benefits or expenditures generated by a particular sector.

Within this policy context, there are some critical areas of the report that require revision, improvement, or outright deletion. Topic areas and section numbers for these areas include:

- 1] The impact of charter growth on quota share value (Sections 4 & 6).
- 2] The implications of a bag limit for participation in the charter fishery (Section 6).
- 3] Appropriate calculation of expenditure estimates for the charter fishery (Sections 3 & 4).

Charter Growth and Quota Share Values: Implications for Net Economic Benefits in the Commercial Fishery

The discussion in section 4.1.4 on the relationship between quota share prices and net benefits to producers is misleading. First, the market value of quota approximates the amount of resource rent from the fishery. Quota share holders own an asset and the value of the asset varies with the market. If the owner received the quota share free, then the entire value is a net benefit. If he purchased the quota share, his net gain in *wealth* is the difference between its market value and the amount paid for the asset (where all values are properly discounted and adjusted for inflation). The owner's annual net benefit from this asset is the interest income on his wealth gain. For example, suppose I purchased a quota share for \$400,000, which today is worth \$500,000. My wealth has increased by \$100,000. Assuming the normal rate of return on

¹ Important caveats regarding the use and interpretation of expenditure data to assess the economic characteristics of the halibut fishery are discussed by Johnston and Sutinen (1999).

investment is 10%, my annual net gain from the quota share is \$10,000. The interest income on the \$400,000 that I paid for the quota share is being earned by the person from whom I purchased the quota.

The net benefits to a commercial halibut fisherman is the difference between his gross revenues and costs, where his costs include the opportunity cost of the quota share. Suppose I am a commercial halibut fisherman and grossed \$1.0 million in revenues in a year. My costs would include my operating costs (\$900,000) and the opportunity cost of my quota share (\$50,000). My net benefits from fishing – my producers surplus – is \$50,000 (\$1,000,000 – \$900,000 – \$50,000). This amount also is the amount of net income that I would receive if did not own quota and instead were fishing under another person's quota share. But, since I own quota, my total net annual benefits from the fishery are \$60,000 (\$50,000 from fishing, added to the \$10,000 benefit resulting from the ownership of a quota share, as calculated in the paragraph above).

Extending this issue, it is important to note the implications of unrestrained charter growth (i.e., as might occur in the absence of a GHL) on the value of quota shares in the commercial fishery. Section 6.2.1, second paragraph assumes that sport removals will increase by 9% and 4% in areas 2C and 3A over the next five years. If this occurs, won't commercial removals almost certainly have to be reduced by comparable amounts in order to stay within in prescribed CEY? If this is indeed the case, then we recommend *stating explicitly* the expected amounts by which commercial removals would decrease if sport removals were to rise unchecked. Such decreases in commercial removals would reduce total revenues (which may be able to be estimated, since ex-vessel demand elasticities are available), producers surplus and the value of quota shares in the commercial fishery, other things constant. In particular, the value of quota shares held (and in many cases purchased) by commercial operators represents the value of expected resource rent that the quota allows the operator to realize. If the charter sector consumes a larger percentage of total harvest, each quota share held by the commercial sector will permit a smaller quantity of harvest and represent a decreased future flow of resource rent. As a result, the current wealth of quota share holders in the commercial sector will decrease.

The previous draft & the conclusion to section 6 of the report state that if that rate of growth in noncommercial harvest were to occur, the ex-vessel revenues to the commercial fishery would drop by 4% per year. This amounts to decreases of \$7.1 million in Area 2C and \$13.4 million during the period 2000 through 2005. Was this information removed because comparable information on the gains by sport sector are not available? We recommend leaving this information in the report, but stating explicitly that the comparable information on the sport sector is not available.

As it now stands, the report is unclear regarding the marginal implications of unrestrained charter growth on net economic benefits in the commercial sector. As this growth would likely become reality in the absence of a GHL, it is important that the report clearly identify and, where possible, quantify the economic implications of this alternative.

Implications of a Bag Limit for Participation in the Charter Fishery

The implications of a GHL for the charter sector will depend largely on the management tools applied to implement the GHL. Of those models (or pieces of information) within the report that allow forecasting of economic policy implications of those management tools, one stands out as particularly misleading. This analysis and its interpretation are included in Section 6.2.2.2.1, the

discussion of the impacts of bag limits on angler participation in the charter fishery. The results provided in this section rely on the misuse and misinterpretation of a model designed for other applications. As a result, the predicted change in angler participation is highly inconsistent with participation changes that have been predicted in properly applied models that forecast the impact of bag limit changes in other fisheries (e.g., Layman, Boyce, and Criddle 1996; Holiman 1999). Moreover, the model used in this section likely provides an exaggeration of the true impact that one might expect in the halibut fishery.

Forecasting the Impact of a Bag Limit Change on the Charter Halibut Fishery

The economic benefits of the charter fishery relate directly to participation in charter trips, and not to the sale of halibut products. Angler participation in charter fishing provides consumer surplus (i.e., their willingness to pay for fishing, minus their actual payments), and payments to charter operators provide the gross revenues from which producer surplus is derived. As halibut harvested by charter anglers is (in general) not bought or sold in organized markets, a change in the quantity of halibut harvested by charter anglers *only* results in an economic impact if this change causes a subsequent change in angler participation (and willingness to pay) in the charter fishery. Accordingly, the economic impact of a bag limit is directly related to anglers' choice of participation in the charter fishery. The predicted change in charter *harvest* (noted on page 179 of the report) has no *direct* economic implications for the charter fishery, although it may have indirect effects in that it may influence the participation of charter anglers, or (alternatively) anglers' willingness to pay for charter halibut fishing trips.

Assessment of the economic implications of a change in the bag limit requires a model specifically designed to assess the *impact of bag limits on participation*, such as that provided for the Gulkana River Chinook fishery by Layman, Boyce, and Criddle (1996). Such an analysis is currently unavailable for the halibut fishery. In its stead, the presented analysis applies Lee et al.'s (1999) model of angler participation in the Kenai Peninsula marine sport fishery (salmon and halibut), which forecasts the hypothetical impact of *catch rate* changes on participation. Although Lee et al.'s (1999) model incorporates appropriate theory—for its intended use—there are two critical reasons why the use and interpretation of the model (applied to bag limits) are inappropriate, and most likely lead to exaggerated estimates of changes in angler participation. These two reasons are detailed below:

1. The analysis does not distinguish between a decrease in catch rate and a decrease in the bag limit.

Two issues are of concern here. First, the participation rate changes provided in Section 6.2.2.2.1 are based on a misuse of Lee et al.'s (1999) model. Second, this misuse likely results in a substantial overestimation of participation changes, leading to a (potentially) highly biased estimate of economic impacts on the charter sector. This conclusion is supported by the results of models that explicitly address the implications of bag limits (Layman, Boyce, and Criddle 1996; Holiman 1999).

A catch rate indicates the total quantity of halibut that will be caught by an angler, per day. This is distinct from a bag limit, which does not necessarily limit catch, but rather only the portion of the catch that may be kept (Swallow 1994). The participation rate model (Lee et al. 1999) forecasts changes in angler participation caused by changes in expected *catch rates*. Note that within the participation rate model, as specified, an angler who catches and releases two halibut

is *just as likely* to participate in the fishery as one who catches and keeps two halibut. In an appropriate use of this model, a bag limit could cause zero impact on participation, because a bag limit does not directly limit the catch rate.² The draft report attempts to side-step this issue with various assumptions. However, at its core, the participation rate model is not designed to address the effect of bag limits. The reason is simple—a bag limit does not constrain catch rate, and Lee et al.'s (1999) model only forecasts the impact of catch rates, *not* bag limits.

This does not mean that a bag limit will have zero impact on participation. Rather, it simply means that the catch rate model, used properly, does not in any way indicate the specific impact of bag limits on the decision to participate in charter fishing. The report's forecasts of changes in participation resulting from a change in catch rate (ranging from 75.2% to 92.8%, depending on the group considered and on model assumptions), is only appropriate if one considers changes in catch rate. It is not appropriate for an analysis of bag limits.

Since anglers presumably have some value (WTP) for fish that are caught and then released, the inappropriate use of Lee et al.'s (1999) model likely results in a significant overestimate of participation rate changes. Why? Simply put, a limit on the catch rate is more constraining to the angler. A limit on the catch rate affects *both* the quantity of fish harvested and the quantity of fish kept (you cannot keep a fish that is not harvested). A change in the bag limit *only* limits the quantity of fish kept. Accordingly, if an angler has any value whatsoever for harvesting a fish that is caught-and-released, then the impact of a change in catch rate will have a larger impact on his/her value of a trip (compared to a change in the bag limit). For example, the willingness to pay (WTP) for a trip in which 5 fish are harvested would be expected to be larger than that for a trip in which 1 fish is harvested—even if the angler could only keep one fish in both cases. To many anglers, the act of catching fish has significant value, even if the fish are not kept. Accordingly, a change in the catch rate (affecting the number of fish harvested) will have a larger impact on value and participation than a change in the bag limit (which only affects the number of fish that may be kept).³

The results of models specifically designed to address the impacts of bag limits on participation and value also suggest that the current draft's estimates overestimate of the impacts of change in the bag limit. For example, Layman, Boyce and Criddle (1996) estimate that a change in the Gulkana River Chinook bag limit, from one to two fish, would cause the average angler to increase fishing trips from 2.67 to 3.19—a change of 19.5%. However, at the same time, anglers stated that they would decrease their number of days per trip. The net result was that an increase in the bag limit from 1 to 2 days actually led to a predicted decrease in fishing days, from 14.68 to 12.17 (17.09%). Extrapolating from these results, tightening the bag limit from 2 to 1 fish in the Chinook fishery would be predicted to cause a moderate (<20%) *decrease* in total trips, and a moderate and more-than-offsetting *increase* in the number of fishing days per trip. The net effect is that anglers are predicted to spend *more* days fishing under a more strict bag limit.⁴

Of course, one might expect differences between angler behavior in the halibut and the salmon fishery—particularly given that salmon is prized both as a sport fish and for its food value, while halibut is primarily valued as a food-fish. Unfortunately, it is not clear whether these differences

² Moreover, there are no variables in Lee et al.'s (1999) model that address bag limits.

³ This, of course, is a generalization based on the assumption that anglers will have greater participation rate in fisheries that offer greater utility benefits, holding all else constant.

⁴ The model estimates a decrease in consumer surplus resulting from a tightening of the bag limit, as one might expect.

would lead to greater or lesser participation changes. For example, a bag limit might have a greater impact on angler behavior in the halibut fishery, because the fish is valued for its meat more than for its "sport value"—and the meat of a halibut is not available to anglers if they must release the fish. Hence, a high proportion of the consumer surplus (and participation) attributed to the fishery may be related to the food value of the fish. However, one might expect other, offsetting behavioral differences, such as a tendency to "high-grade", or spend additional time fishing in order to obtain a particularly large, high quality fish (as the bag limit would only allow one fish to be kept). One might also spend additional days fishing to reach some minimum desired number of "take-home" halibut, given that only one fish could be kept per day. Despite this, it is clear that the appropriately specified bag limit model provides estimates of participation change far lower than that provided by the misuse of Lee et al.'s (1999) model in the draft report.

An alternative approach to estimating the impact of bag limits is taken by Holiman (1999), in his analysis of the Gulf of Mexico Red Snapper fishery. Holiman (1999) asks anglers to predict their reactions to a reduction in the Red Snapper bag limit from *five to zero* fish per trip. Even in this extreme case (in which the bag limit is reduced to zero), just over 30% of red snapper anglers indicated that they would stop fishing for red snapper, and approximately 7% indicated that they would stop fishing entirely.⁵ Although these results do not indicate the impact of the bag limit change on total trips (or days fishing), it does suggest that decreases in participation of 74-92% range suggested by the draft report (resulting from a change in the halibut bag limit from two to one fish per day) are most likely unrealistic and misleading.

The critical issue here is that a properly applied bag-limit model (albeit for chinook salmon) predicts participation changes in the 15-20% range, and in some cases predicts increases in participation due to tightened bag limits. Similarly, Holiman's (1999) results suggest only a moderate change in participation in fishing participation, particularly if one considers substitution possibilities among species. These results are in stark contrast to the draft report which, based on misuse of the Lee et al. (1999) model, predicts participation changes ranging from 74-90%. *Given that there is no apparent justification for the predictions provided in the draft report, and these numbers predict changes as much as five times greater than those predicted by appropriate bag limit models in other fisheries, the existing predictions should be dropped from the report entirely.* These numbers provide little in terms of realistic projections, and serve primarily to mislead and confuse readers. If more appropriate numbers cannot be estimated for the halibut fishery, the report should reference past experiences in other fisheries, or published, peer-reviewed models such as Layman, Boyce, and Criddle's (1996)⁶, to provide ballpark estimates of participation impacts.

2. *The draft analysis is based on a hypothetical stated preference model*

Lee et al.'s (1999) model is based on a "contingent behavior" or a "hypothetical travel cost" methodology. That is, surveyed anglers are asked to predict how their recreational fishing participation would change, given hypothetical changes in trip costs, catch rates, and other factors. Although NOAA and other government agencies accept such models as providing

⁵ The predicted effect is somewhat larger if one considers all Gulf of Mexico anglers (Holiman 1999), with approximately 55% indicating that they would stop fishing for the species. However, of these, an undetermined number would substitute fishing for other species, causing the effect on overall fishing participation to be smaller.

⁶ Unlike Lee et al.'s (1999) model, the approach of Layman, Boyce, and Criddle (1996) has been published by a national economics journal (*Land Economics*), and has therefore undergone strict peer-review.

Memorandum

To: Chuck Hamel, NPFMC

From: Todd Lee, AFSC

Date: 02/04/2000

Re: Estimating participation rate bounds for a decrease in the halibut bag limit

The purpose of this memorandum is to explain how upper and lower bounds may be placed on the effect of changing the halibut bag limit from two (2) to one (1). The reason why only bounds can be estimated is that the data were collected under the current bag limit regulations of two (2) fish per day per licensed angler. I should point out that the bounds I present are based on logical constructs, rather than statistical sampling theory (i.e., they are not statistical confidence limits).

In order to construct bounds some assumption must be made about the effect of the regulation on the catch rate. Your GHL analysis states that the 1997 average catch per day per angler for charter trips is 3.61 for Alaska residents and 3.45 for non-residents. To demonstrate the range of possible outcomes I will discuss and calculate bounds under two different assumptions or scenarios: (1) the total catch remains constant; and (2) the total catch decreases by one fish per day.

It is interesting to note that if the marginal utility of catch is constant the problem is greatly simplified. Under this assumption, the utility derived from catching additional fish is constant, and consequently, the marginal utility of keeping equals the marginal utility of releasing. If this were true, then it is possible to directly calculate the correct point estimate under each of the above scenarios. However, the results from my working paper¹ strongly suggest that the marginal utility of catch is decreasing in catch. We therefore must investigate placing bounds on the point estimate.

I will use Figure 1 to demonstrate the bounds you used in the GHL analysis, how those bounds relate to the two catch rate scenarios, and how those bounds may be improved. Suppose that the estimated, conditional, indirect utility of halibut catch has been estimated and is the curve OY . This function is conditional since it depends on the levels of other relevant variables like fish size and trip cost. The utility function depicts the decreasing marginal utility of catch result discussed above. The results of course apply to any utility function that is concave in catch. By way of example, assume that an angler catches three (3) halibut per day before the keep limit is reduced.

The utility of catching and being allowed to keep 1 fish is d . The utility of catching and being allowed to keep 2 fish is b . The utility associated with catching three halibut (catching and being allowed to keep 2 fish, and catching and releasing 1 fish) is a . Thus the marginal utility of catching and releasing 1 fish conditional on catching and being allowed to keep 2 fish is $a - b$. You established the upper bound by measuring the quantity $-(a - b)$ for the appropriate initial catch, and translating it into a change in probability using the link function I provided in the working paper. This is clearly an upper bound for the scenario where total catch is reduced by one fish. It measures the marginal utility of a fish the angler must release, rather than the marginal

utility of a fish the angler is allowed to keep (given that they would both be the second and last fish caught). Also note that if the marginal utility of catch were constant this would provide the correct measure of the change in utility associated with a 1 fish reduction in the bag limit (under the scenario that total catch is reduced by one fish).

You established the lower bound by decreasing catch to 1 fish. Assuming again that the angler's catch was initially 3 fish, the change in utility is $-(a - d)$. This is clearly a lower bound under both scenarios, an overstatement of the effect of a 1 fish bag limit, since it measures the effect of (1) reducing the number of fish that an angler catches and is allowed to keep by 1 fish; and (2) the number of released fish to 0.

I will now describe a better method to measure the lower bound. This method is "better" because it provides a smaller overstatement of the effect. I will first show this for the second scenario where total catch remains constant. The bound is constructed by assuming that the marginal utility of catch-and-release fishing is independent of whether an angler is allowed to keep 1 or 2 fish. Under this assumption a new utility function (OZ) can be constructed by moving the line segment XY in a southwesterly direction until it intersects with point W. This is equivalent to removing the second fish caught that the angler was allowed to keep, the line segment WX. Now, for example, an angler who catches 3 fish is allowed to keep 1 of the fish and must release the other two. The angler would receive a utility level equal to c . The change in utility is therefore $-(a - c)$. This is almost certainly still a lower bound however since it is extremely likely that the marginal utility of catching-and-releasing is a decreasing function of the number of fish an angler is allowed to keep. It is interesting to note that if this is not the case (i.e., the marginal utility of catching-and-releasing does not depend on the number of fish caught and allowed to keep), $-(a - c)$ is an exact measure of the change in utility. A special case of this would be a utility function that is linear in catch. Under this condition this lower bound provides an exact measure of the change in utility.

A lower bound under the first scenario (total catch is reduced by 1 fish) is measured by the reduction in utility from the initial position, a , to where the angler is allowed to keep 1 fish and release one fish. This utility level is given by e in Figure 1. Thus $-(a - e)$ is the lower bound. Like the previous case, this is almost certainly a lower bound since it is extremely likely that the marginal utility of catching-and-releasing is a decreasing function of the number of fish an angler is allowed keep. Otherwise, this too is an exact measure.

The last bound that remains to be constructed is an upper bound for the scenario where total catch is unchanged. Establishing this upper bound takes a slightly different approach. I will examine the magnitude of two different marginal utilities. The first is the marginal utility of catching and being allowed to keep a fish conditional on having already kept one fish. The second is the marginal utility of catching and having to release a fish conditional on having already kept one fish. It is almost certain that the former is larger in magnitude than the later. It therefore follows that replacing the former with the later in the utility function will provide an upper bound to the effect of the regulation. This can be shown graphically (though I don't to avoid too much clutter) if you imagine that line segment VY is copied and moved in a southwesterly direction until it meets point X. The difference between this new utility function and a is the measure of the change in utility.

I have estimated the new lower bounds and an additional upper bound using the average characteristics of Alaskan and Non-Alaskan anglers as defined in my working paper¹, and using

¹ Lee, S.T., M. Herrmann, K. Criddle, and C. Hamel. 1999. *The Effect of Fishery Attributes on Participation Rates: the Kenai Peninsula Marine Sport Fishery*. Working Paper. November.

the catch, size and price attributes you reported in your analysis. These are contained in Table 1. Please note that these estimates are based on average angler characteristics and do not follow the sample enumeration method. From my experience with this data and model the difference is quite small, but should be noted nevertheless.

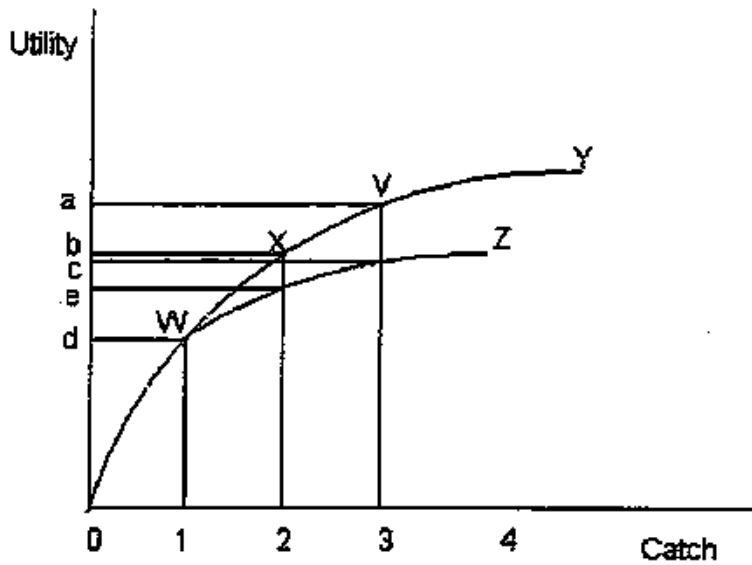
Please let me know if you have any questions or comments.

Table 1. Calculated bounds of the change in participation rate under different scenarios.

	Upper Bound	Lower Bound
Total Catch Unchanged		
Resident	-7.5%	-66.2%
Non-Resident	-8.2%	-59.4%
Total Catch Reduced by 1 Fish		
Resident	-18.7%*	-66.8%
Non-Resident	-26.3%*	-62.8%

* From NPFMC GHL analysis.

Figure 1. Utility of Halibut Catch.



Fishery Management Plan Amendment Proposal
North Pacific Fishery Management Council
February 2, 2000

Guided Sport Fishery Halibut IFQ

Proposers:

Robert Ward
P. O. Box 631
Anchor Point, AK. 99556
907-235-7014

Mike Bethers
P. O. Box 32323
Juneau, AK. 99803
907-789-7234

REVISED
2/3

Brief Statement of Proposal:

This program would integrate the halibut charterboat industry into the existing halibut IFQ plan for the setline fishery in IPHC areas 2C and 3A. Quota shares would be based on the current removals as demonstrated by the 1998 and 1999 charterboat logbook data.

IFQ shares would be converted to numbers of fish (by average size fish harvested) instead of pounds and would be used in number of fish increments. Quota shares would be fully transferable within the charterboat industry and with the commercial fishery share for share. The initial charterboat allocation would be based on the average of the vessel s 1998 and 1999 logbook data plus 25% for the following reasons: many operators will enter with small amounts of quota, total halibut abundance has just dropped in area 3A by 25% and in area 2C by 10%, lack of small blocks of quota available on the open market now, with only a 2 year qualifying period some buffer to offset the short qualifying period.

Object of the proposal:

To establish an allocation to the Alaskan charterboat industry that provides for adjustments to the level of access through transfer of quota shares by either fishery.

Need and Justification:

The NPFMC is charged with management of halibut fisheries in the North Pacific. The NPFMC is considering adopting a Guideline Harvest Level for the guided recreational fishery which could have detrimental impacts on public access to the halibut resource and the stability of charter businesses targeting halibut. This proposed charterboat industry IFQ program would place an initial cap on the halibut harvest at current levels but would provide the charter industry with a mechanism to adjust the amount of access by each operator through transfer of quota shares

from other quota share holders in either fishery. This program would fulfill the concerns of the Alaska Longline Fisherman s Association, and would provide industry stability to the fisheries involved.

Foreseeable Impacts of Proposal:

Total halibut charterboat harvests would be capped to prevent further erosion of the commercial quota shares, overcapitalization concerns may be mitigated through consolidation of charterboat quota shares, and public access can be adjusted to the current needs through purchase and transfer of quota shares.

Are there Alternative Solutions?

The Guideline Harvest Level will achieve the commercial sector s desire to limit the guided recreational harvest but may cause instability to the charterboat fleet, restricted access by the recreational public, and no mechanism for adjusting access level. This is not acceptable to the recreational fishermen and the charterboat industry.

Supportive Data & Other Information:

The 1998 and 1999 Saltwater Charter Vessel Logbook data documents individual vessel activity for determining initial issue. The AK F & G Creel survey and Port Sampling will continue to monitor the harvest of halibut by the guided recreational fishery to determine the average size of all fish harvested. Quota usage would be monitored through verification of logbook entries at point of off loading by enforcement personnel.

Signatures:



o-ward.vcl

BENTON

Area 2C: 1995 Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1995 plus 125% 1995	0.99	1.23	49,615	62,019
6-8	Less 10%	0.89	1.11	44,654	55,817
4-6	Less 10% more	0.80	1.00	40,188	50,235
Less than 4	Less 10% more	0.72	0.90	36,169	45,212

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1995 plus 125% 1995	0.99	1.23	49,615	62,019
6-8	Less 15%	0.84	1.05	42,173	52,716
4-6	Less 15% more	0.72	0.89	35,847	44,809
Less than 4	Less 15% more	0.61	0.76	30,470	38,087

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1995 plus 125% 1995	0.99	1.23	49,615	62,019
6-8	Less 20%	0.79	0.98	39,692	49,615
4-6	Less 20% more	0.63	0.79	31,754	39,692
Less than 4	Less 20% more	0.51	0.63	25,403	31,754

Area 3A: 1995 Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1995 plus 125% 1995	2.84	3.55	137,843	172,304
16-20	Less 10%	2.56	3.20	124,059	155,074
10-15	Less 10% more	2.30	2.88	111,653	139,566
Less than 10	Less 10% more	2.07	2.59	100,488	125,610

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1995 plus 125% 1995	2.84	3.55	137,843	172,304
16-20	Less 15%	2.41	3.02	117,167	146,458
10-15	Less 15% more	2.05	2.56	99,592	124,490
Less than 10	Less 15% more	1.74	2.18	84,653	105,816

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1995 plus 125% 1995	2.84	3.55	137,843	172,304
16-20	Less 20%	2.27	2.84	110,274	137,843
10-15	Less 20% more	1.82	2.27	88,220	110,275
Less than 10	Less 20% more	1.45	1.82	70,576	88,220

Area 2C: 1995-1999 Avg Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.12	1.40	50,636	63,295
6-8	Less 10%	1.01	1.26	45,572	56,966
4-6	Less 10% more	0.91	1.13	41,015	51,269
Less than 4	Less 10% more	0.82	1.02	36,914	46,142

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.12	1.40	50,636	63,295
6-8	Less 15%	0.95	1.19	43,041	53,801
4-6	Less 15% more	0.81	1.01	36,585	45,731
Less than 4	Less 15% more	0.69	0.86	31,097	38,871

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.12	1.40	50,636	63,295
6-8	Less 20%	0.90	1.12	40,509	50,636
4-6	Less 20% more	0.72	0.90	32,407	40,509
Less than 4	Less 20% more	0.57	0.72	25,926	32,407

Area 3A: 1995-1999 Avg Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.13	3.91	149,512	186,890
16-20	Less 10%	2.82	3.52	134,561	168,201
10-15	Less 10% more	2.54	3.17	121,105	151,381
Less than 10	Less 10% more	2.28	2.85	108,994	136,243

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.13	3.91	149,512	186,890
16-20	Less 15%	2.66	3.33	127,085	158,857
10-15	Less 15% more	2.26	2.83	108,022	135,028
Less than 10	Less 15% more	1.92	2.40	91,819	114,774

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.13	3.91	149,512	186,890
16-20	Less 20%	2.50	3.13	119,610	149,512
10-15	Less 20% more	2.00	2.50	95,688	119,610
Less than 10	Less 20% more	1.60	2.00	76,550	95,688

Area 2C: 1995-1998 Avg Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.14	1.43	48,572	60,715
6-8	Less 10%	1.03	1.28	43,715	54,644
4-6	Less 10% more	0.92	1.15	39,343	49,179
Less than 4	Less 10% more	0.83	1.04	35,409	44,261

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.14	1.43	48,572	60,715
6-8	Less 15%	0.97	1.21	41,286	51,608
4-6	Less 15% more	0.82	1.03	35,093	43,867
Less than 4	Less 15% more	0.70	0.88	29,829	37,287

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.14	1.43	48,572	60,715
6-8	Less 20%	0.91	1.14	38,858	48,572
4-6	Less 20% more	0.73	0.91	31,086	38,858
Less than 4	Less 20% more	0.58	0.73	24,869	31,086

Area 3A: 1995-1998 Avg Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.12	3.90	149,512	186,890
16-20	Less 10%	2.81	3.51	134,561	168,201
10-15	Less 10% more	2.53	3.16	121,105	151,381
Less than 10	Less 10% more	2.27	2.84	108,994	136,243

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.12	3.90	149,512	186,890
16-20	Less 15%	2.65	3.32	127,085	158,857
10-15	Less 15% more	2.25	2.82	108,022	135,028
Less than 10	Less 15% more	1.92	2.40	91,819	114,774

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.12	3.90	149,512	186,890
16-20	Less 20%	2.50	3.12	119,610	149,512
10-15	Less 20% more	2.00	2.50	95,688	119,610
Less than 10	Less 20% more	1.60	2.00	76,550	95,688

Area 2C: 1999 Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.06	1.33	65,268	81,585
6-8	Less 10%	0.95	1.19	58,741	73,427
4-6	Less 10% more	0.86	1.07	52,867	66,084
Less than 4	Less 10% more	0.77	0.97	47,580	59,475

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.17	1.47	65,268	81,585
6-8	Less 15%	0.99	1.25	55,478	69,347
4-6	Less 15% more	0.85	1.06	47,156	58,945
Less than 4	Less 15% more	0.72	0.90	40,083	50,103

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1999 plus 125% 1999	1.17	1.47	65,268	81,585
6-8	Less 20%	0.94	1.18	52,214	65,268
4-6	Less 20% more	0.75	0.94	41,772	52,214
Less than 4	Less 20% more	0.60	0.75	33,417	41,772

Area 3A: 1999 Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.15	3.94	169,282	211,603
16-20	Less 10%	2.84	3.54	152,354	190,443
10-15	Less 10% more	2.55	3.19	137,118	171,398
Less than 10	Less 10% more	2.30	2.87	123,407	154,259

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.05	3.81	169,282	211,603
16-20	Less 15%	2.59	3.24	143,890	179,863
10-15	Less 15% more	2.20	2.75	122,306	152,883
Less than 10	Less 15% more	1.87	2.34	103,960	129,951

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1999 plus 125% 1999	3.05	3.81	169,282	211,603
16-20	Less 20%	2.44	3.05	135,426	169,282
10-15	Less 20% more	1.95	2.44	108,340	135,426
Less than 10	Less 20% more	1.56	1.95	86,672	108,341

Area 2C: 1998 Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1998 plus 125% 1998	1.77	2.21	60,810	76,013
6-8	Less 10%	1.59	1.99	54,729	68,412
4-6	Less 10% more	1.43	1.79	49,256	61,571
Less than 4	Less 10% more	1.29	1.61	44,330	55,413

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1998 plus 125% 1998	1.77	2.21	60,810	76,013
6-8	Less 15%	1.50	1.88	51,689	64,611
4-6	Less 15% more	1.28	1.60	43,935	54,919
Less than 4	Less 15% more	1.09	1.36	37,345	46,681

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 8	1998 plus 125% 1998	1.77	2.21	60,810	76,013
6-8	Less 20%	1.42	1.77	48,648	60,810
4-6	Less 20% more	1.13	1.41	38,918	48,648
Less than 4	Less 20% more	0.91	1.13	31,135	38,919

Area 3A: 1998 Base Year

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1998 plus 125% 1998	3.24	4.05	155,244	194,430
16-20	Less 10%	2.92	3.65	139,720	174,987
10-15	Less 10% more	2.62	3.28	125,748	157,488
Less than 10	Less 10% more	2.36	2.95	113,173	141,739

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1998 plus 125% 1998	3.24	4.05	155,244	194,430
16-20	Less 15%	2.75	3.44	131,957	165,266
10-15	Less 15% more	2.34	2.93	112,164	140,476
Less than 10	Less 15% more	1.99	2.49	95,339	119,404

Total Removals (Pounds)	Allocation Basis	Harvest Range Pounds		Harvest Range Numbers	
		lower	upper	lower	upper
Greater than 20	1998 plus 125% 1998	3.24	4.05	155,244	194,430
16-20	Less 20%	2.59	3.24	124,195	155,544
10-15	Less 20% more	2.07	2.59	99,356	124,435
Less than 10	Less 20% more	1.66	2.07	79,485	99,548

THE PREVIOUS TABLE WAS INCORRECT. This is the corrected version.

IPHC Area 2C					1995 base year	1998 base year				
Year	Commercial Catch Limit (x1000)	Commercial Catch (x1000)	Charter Catch (x1000 lb)	Charter Catch (fish)	Charter GHL @ 125% (x1000)	Net Wt (lb) per Total Sport / Charter Fish (ADF&G)	GHL in Numbers	GHL as % of Catch Limit + Sport Charter	GHL (numbers) based on 12.76% of Catch Limit + Sport Charter	GHL (numbers) based on 18.01% of Catch Limit + Sport Charter
1995	9,000	7,760	986	49,615	1,233	18.30	67,400	12.35%	69,600	98,300
1996	9,000	8,800	936	41,864	1,170	21.70	53,900	11.78%	58,400	82,500
1997	10,000	9,890	852	42,001	1,065	21.60	49,300	9.81%	64,100	90,500
1998	10,500	10,230	1,767	60,810	2,209	25.80	85,600	18.01%	60,700	85,600
1999	10,490	10,202	1,060	58,889	1,325	18.00	73,600	11.47%	81,900	115,600
Average (95-99)	9,798	9,376	1,120	50,636	1,400	21.08	65,960	12.68%	66,940	94,500
Average (95-98)	9,625	9,170	1,135	48,573	1,419	21.85	64,050	12.99%	63,200	89,225
Average (98-99)	10,495	10,216	1,414	59,850	1,767	21.90	79,600	14.74%	71,300	100,600
Average (97-99)	10,330	10,107	1,226	53,900	1,533	21.80	69,500	13.10%	68,900	97,233

IPHC Area 3A					1995 base year	1998 base year				
Year	Commercial Catch Limit (x1000)	Commercial Catch (x1000)	Charter Catch (x1000 lb)	Charter Catch (fish)	Charter GHL @ 125% (x1000)	Net Wt (lb) per Charter Fish (ADF&G)	GHL in Numbers	GHL as % of Catch Limit + Charter	GHL (numbers) based on 15.61% of Catch Limit + Charter	GHL (numbers) based on 13.85% of Catch Limit + Charter
1995	20,000	18,340	2,839	137,843	3,549	19.30	183,900	15.54%	184,700	163,900
1996	20,000	19,690	2,885	147,133	3,606	19.30	186,800	15.76%	185,100	164,200
1997	25,000	24,680	3,512	157,828	4,390	20.20	217,300	15.40%	220,300	195,500
1998	26,000	25,870	3,238	155,244	4,048	18.90	214,200	13.84%	241,500	214,300
1999	24,670	25,287	3,152	175,111	3,940	18.00	218,900	14.16%	241,300	214,100
Average (95-99)	23,134	22,773	3,125	154,632	3,907	19.14	204,220	14.94%	214,580	190,400
Average (95-98)	22,750	22,145	3,119	149,512	3,898	19.43	200,550	15.13%	207,900	184,475
Average (98-99)	25,335	25,579	3,195	165,178	3,994	18.45	216,550	14.00%	241,400	214,200
Average (97-99)	25,223	25,279	3,301	162,728	4,126	19.03	216,800	14.47%	234,367	207,967

LB moved

FuglV06

AREA 2-C

<u>Required Reduction</u>	<u>Management Tool</u>	<u>Estimated Result</u>
< 10%	Trip Limit	< 10%
10% - 15%	Trip Limit No Harvest by Skipper & Crew	<10% <u>3%</u> <13%
15% - 20%	Trip Limit No Harvest by Skipper & Crew Annual Limit of 7 Fish	<10% 3% <u>8%</u> <21%
20% - 30%	Trip Limit No Harvest by Skipper & Crew Annual Limit of 6 Fish	<10% 3% <u>18%</u> <31%
30% - 40%	Trip Limit No Harvest by Skipper & Crew Annual Limit of 5 Fish	<10% 3% <u>*24%</u> <37%
40% - 50%	Trip Limit No Harvest by Skipper & Crew Annual Limit of 4 Fish	<10% 3% <u>39%</u> <52%
>50%	Trip Limit No Harvest by Skipper & Crew Annual Limit of 4 Fish One Fish Bag Limit in Aug.	<10% 3% 39% <u>12%</u> <64%

* interpolated

Fishery Management Plan Amendment Proposal
North Pacific Fishery Management Council
February 2, 2000
Guided Sport Fishery IFQ

Proposers:

Bob Ward
P.O. Box 631
Anchor Point, AK. 99556
907-235-7014

Mike Bethers
P.O. Box 32323
Juneau, AK. 99803
907-789-0165

Brief Statement of Proposal:

This program would integrate the halibut charter boat industry into the existing halibut IFQ plan for the setline fishery in areas 2-C and 3-A. Individual quota shares would be based on removals as demonstrated by 1998 and 1999 charter logbook data. IFQ shares would be converted to numbers of fish (by average size of fish harvested) instead of pounds and would be used in number of fish increments. Quota shares would be fully transferable within the guided halibut sport fishery and within the commercial fishery-share for share. Original guided sport allocation would be based on 1998 data +30%, to eliminate the need for a qualifying period, which was provided, to the commercial sector.

Object of the proposal:

To establish an allocation to the Alaskan halibut charter industry that provides for adjustments to the level of access through transfer of quota shares by either fishery.

Need and Justification:

The NMFS is charged with management of halibut fisheries in the North Pacific. The NPFMC is considering adopting a GHL for the guided halibut sport fishery, which could have detrimental impacts on public access to the halibut resource and the stability of the charter businesses targeting halibut. This proposed charter boat industry program would place an initial cap on the guided sport harvest, but would provide the charter industry a mechanism to adjust the amount of access by each operator through transfer of quota share from other quota share holders in either the charter or commercial fisheries. This program would fulfill the concerns of the Alaska Longline Fisherman's Association, and would provide industry stability to fisheries involved.

Foreseeable Impacts of Proposal:

Total guided sport harvest would be temporarily capped to prevent erosion of the commercial quota shares; over capitalization concerns may be mitigated through consolidation of guided sport quota shares, and public access can be adjusted to the public demand through transfer of quota shares.

Are there Alternative Solutions?

The Guideline Harvest Level will achieve the commercial sector's desire to limit the guided recreational harvest but may cause instability to the charterboat fleet, restricted access by the recreational public, and no mechanism for adjusting access level. This is not acceptable to the recreational fishermen and the charterboat industry.

Supportive Data & Other Information:

The 1998 and 1999 Saltwater Charter Vessel Logbook data documents individual vessel activity for determining initial issue. The AK F & G Creel survey and Port Sampling will continue to monitor the harvest of halibut by the guided recreational fishery to determine the average size of all fish harvested. Quota usage would be monitored through verification of logbook entries at point of off loading by enforcement personnel.

Signatures:

Robert [Signature]

Mike [Signature]

COMMISSIONERS:
RICHARD J. BEAMISH
NANAIMO, B.C.
RALPH G. HOARD
SEATTLE, WA
KATHLEEN PEARSON
SKIDGATE, HADZA QIVAN
STEVEN PENNOYER
JUNEAU, AK
ANDREW P. SCALZI
HOMER, AK
JOHN SECORD
VANCOUVER, BC

INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

February 2, 2000

DIRECTOR
BRUCE M. LEAMAN

AGENDA C-1(e)
FEBRUARY 2000

TELEPHONE
(206) 634-1888

FAX:
(206) 632-2983

Dr. Clarence Pautzke, Executive Director
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: February 2000 Meeting - Agenda Item C-1 Halibut Charter **GHL**

Dear Clarence:

The staff of the International Pacific Halibut Commission has reviewed the January 10, 2000 draft of the EA/RIR/TRFA for the proposed Guideline Harvest Level (GHL) management plan for Areas 2C and 3A under consideration by the North Pacific Fishery Management Council (Council). We recognize that the primary goal of the proposal is to allocate the harvest of halibut between the commercial and guided sport fisheries in Areas 2C and 3A, which is within the Council's jurisdiction. As such, we have no recommendation for a preferred option. However, we are concerned with the effectiveness of the GHL. We find that the proposal intersects with our management of the fishery and resource, which leads us to highlight five areas of concern.

(1) **Stock Projections.** The halibut resource has been declining since the late 1980s, when biomass was at historically high levels. Although biomass in Areas 2C and 3A has declined three and five percent annually, respectively, since the 1980s, in more recent years the rate of decline has ranged from 10 to 15 percent. The EA/RIR uses projections of stock decline of 3 to 5 percent, which we believe is too conservative for the short term. A more reasonable assumption would be 10 to 15 percent. The implication for the Council is that GHL adherence may be required sooner than is believed.

(2) **A Preferred Decision-Making Process for Allocation.** We believe that a proper decision making process for allocating halibut among users should include full allocation of all removals. All user groups should participate in conservation. User groups should be held accountable for removals under their control. Attached, you will find a chart depicting our preferred decision-making process for the Council to consider. Under such a process, which is predicated on an effective monitoring and enforcement program for a GHL, personal use and bycatch mortality are subtracted from the total available yield. The Commission would decide upon a combined catch limit for sport and commercial users after discussing recommendations from the staff, Conference Board, and the Processor Advisory Group. The Council would allocate between the sport and commercial sectors according to a GHL or other type of catch sharing plan. (The asterisk next to the GHL Split box is simply to note that a split which incorporates non-guided sport would use different percentage values than are in the present EA/RIR.) This is similar to the process shared by IPHC and the Pacific Fishery Management Council for allocations in Area 2A. We suggest the Council consider such an arrangement for Area 2C and 3A if it decides to explicitly allocate among sport and commercial groups.

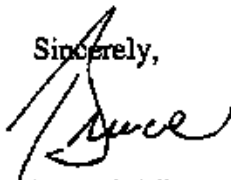
(3) Effectiveness of Proposed Management Measures. The EA/RIR contains discussion about eleven management measures available to constrain the sport catch with a GHL and effectiveness of such measures. We agree that only bag limits and possibly prohibiting vessel crews to catch halibut are the only meaningful measures available, and the actual impact of reducing the annual bag limit will likely result in greater reductions than are needed. However, if fishing effort increases in response to lower bag limits, the savings projected from lower bag limits may not be fully realized. Most of the other measures, e.g., boat limits, possession limits, line limits, angler limits, will result in redistributing effort or have little effect due to the few fishing trips conducted by individual harvesters. Also, we find the concept of a sport fish reserve to be biologically unsound: uncaught fish in one year are not available in subsequent years at the same level of productivity. We recommend the Council consider measures that are more effective at achieving its management goals, such as allowing the bag limits to change by time of year.

(4) Enforcement. We are very concerned about the need for large increases in enforcement required by the GHL program given the difficulty NMFS Enforcement has had in meeting IFQ enforcement goals. Management measures imposed on the guided sport fishery to constrain the catch within a GHL would require additional enforcement to ensure compliance, yet there is no assurance given in the EA/RIR that such enforcement would occur. The EA/RIR only discusses NMFS access to State data, but we believe that on-water enforcement is even more critical to achieving success with a GHL. We recommend that the Council require an enforcement plan which seeks verification of catches and accountability of harvesters before adopting a GHL plan for Areas 2C and 3A. Also, IPHC would need assurances of an appropriate enforcement and monitoring plan to ensure that catches do not exceed catch limits.

(5) GHL Management. We have identified two issues which we wish to bring to the Council's attention. First, we recommend that GHL management be conducted in terms of weight and not numbers of fish. This would be consistent with our management and assessment procedures. It is also the way all other halibut removals are counted. A simple conversion from weight to numbers of fish could be constructed from data on average weight for industry monitoring and compliance. Second, we would advise against choosing alternatives with rolling averages, such as the 3-year rolling average in Alternative 2, Issue 1, Option 3. Rolling averages have a high potential for over-harvest, thus creating a conservation problem.

A member of our staff will be attending the meeting and will be available to address questions the Council may have on these recommendations.

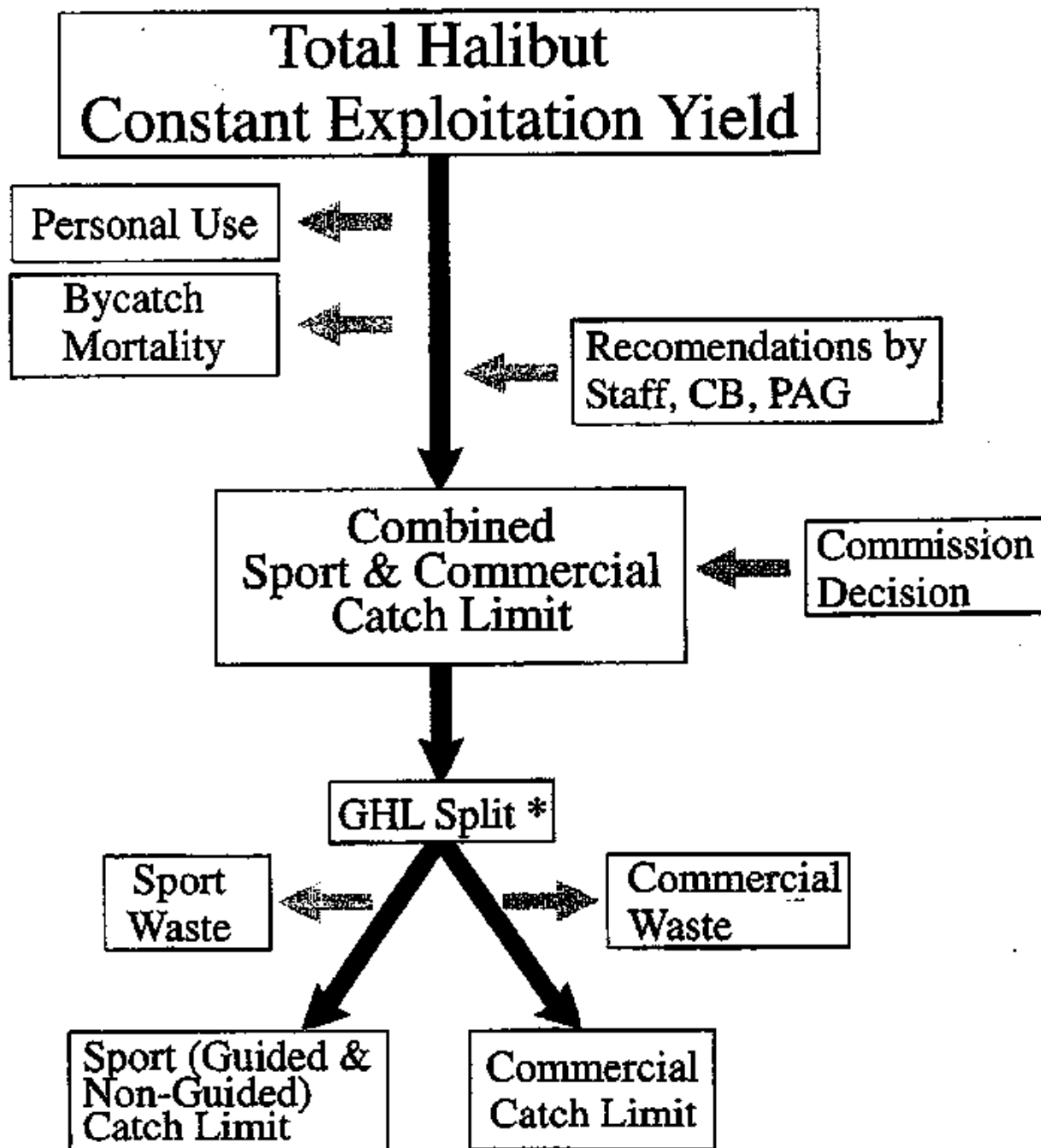
Sincerely,



Bruce M. Leaman
Executive Director

cc: IPHC Commissioners

Preferred Decision-Making Process with Sport and Commercial Allocations (Areas 2C and 3A)




UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

 Office of General Counsel
 P.O. Box - 21109
 Juneau, Alaska 99602-1109

 AGENDA C-1(d)
 FEBRUARY 2000

December 4, 1995

MEMORANDUM FOR: North Pacific Fishery Management Council

THROUGH: Lisa Lindeman
 Alaska Regional Attorney *Lisa Lindeman*

FROM: Jonathan Pollard *Jonathan Pollard*
 Attorney-Advisor

SUBJECT: State regulatory authority over the Pacific
 halibut fisheries

QUESTION PRESENTED:

Is State authority to regulate fishing for Pacific halibut in Convention waters preempted by the Convention Between the United States and Canada for the Preservation of the Pacific Halibut Fishery of the Northern Pacific Ocean and the Bering Sea ("Convention") and the Northern Pacific Halibut Act, 16 U.S.C. §§ 773-773k?

BRIEF ANSWER:

Yes. State authority to regulate fishing for Pacific halibut in Convention waters is preempted by federal law. The Convention and the Northern Pacific Halibut Act amount to comprehensive and pervasive federal regulation of, and a dominant federal interest in, direct and uniform regulation of the Pacific halibut fishery in Convention waters.

SHORT DISCUSSION:

A preemption question requires examination of Congressional intent. First, Congress explicitly may define the extent to which its enactments preempt State laws. Second, preemption may be inferred through Congress' occupation of a given field to the exclusion of State law. Such an inference may be drawn when --



the pervasiveness of federal regulation precludes supplementation by the States, or

the federal interest in the field is sufficiently dominant, or

the object of the federal law and the character of the obligations imposed by it reveal the same purpose.

See Pacific Gas and Electric Co. v. State Energy Resources Conservation and Development Commission, 461 U.S. 190, 204 (1982). The Supreme Court repeatedly has held that where Congress has exercised exclusive jurisdiction over a general and inclusive area of activity, the very delegation of regulatory power to an administrative agency will supersede any State action over that area. See Ray v. ARCO, 435 U.S. 151, 157 (1978); Bethlehem Steel v. New York Labor Relations Board, 330 U.S. 767 (1947). Such a comprehensive arrogation of governmental powers nullifies looser or stricter direct State regulation of the subject matter. See Ray v. ARCO, 435 U.S. 151 (1978); Huron Portland Cement v. Detroit, 362 U.S. 440 (1960).

Finally, even where Congress has not entirely displaced State law in a particular field, State law is preempted to the extent that it actually conflicts with federal law. Such a conflict will be found when --

it is impossible to comply with both State and federal law, or

the State law stands as a obstacle to the accomplishment of the purposes and objectives of Congress.

See Pacific Gas and Electric Co. v. State Energy Resources Conservation and Development Commission, 461 U.S. 190, 204 (1982).

Although the Convention and the Halibut Act do not expressly preempt State laws directly regulating the Pacific halibut fishery in Convention waters, the Convention and the Act amount to a pervasive scheme of federal regulation occupying the field to the exclusion of all State laws that are not identical to the federal regulations. Article I of the Convention states that all

fishing for Pacific halibut in Convention waters (including State waters) is prohibited except as expressly provided in the Convention. Further, persons may fish for Pacific halibut only in accordance with the Convention and the approved regulations of the International Pacific Halibut Commission. The Commission has broad authority to adopt regulations to develop and maintain the stocks of Pacific halibut pursuant to Article III of the convention. Article I, paragraph 2, states that each "Party" (the United States and Canada) may establish additional regulations governing the taking of Pacific halibut that are more restrictive than those adopted by the Commission.

The Halibut Act implements the Convention, and provides that the Secretary of Commerce has general responsibility to carry out the Convention and the Halibut Act, and that the regional fishery management councils may develop Pacific halibut fishery regulations that are in addition to, and not in conflict with, Commission regulations. Council regulations can be implemented only with the approval of the Secretary of Commerce.

Taken together, the Convention and the Halibut Act and implementing Commission and federal regulations constitute a comprehensive and pervasive regulatory scheme that completely occupies the field of Pacific halibut fishery regulation, including research, open and closed areas, gear limitations, quotas, allocation and more. Furthermore, this conclusion is also supported by the possibility of collision between Pacific halibut fishery regulations adopted by Alaska, Washington, Oregon and California and those adopted by the Commission and the federal government. When State regulations could affect the ability of the federal government to regulate comprehensively and uniformly or presents the prospect of interference with the federal regulatory power, then State law will be preempted even though collision between State and federal law may not be an inevitable consequence. Scheidewind v. ANR Pipeline Co., 485 U.S. 293, 310 (1988); Northern Natural Gas Co. v. State Corporation Commission of Kansas, 372 U.S. 84, 91-92 (1963).

In conclusion, States have no authority to directly regulate aspects of the Pacific halibut fishery in Convention waters that have been preserved by the Convention and the Halibut Act to the exclusive regulatory jurisdiction of the Commission, the regional

fishery management councils and the Secretary of Commerce¹ - such matters as research, designation of open and closed areas, gear limitations, quotas, and allocation of fishing privileges. Consequently, States have no regulatory authority in this area to which the regional fishery management councils and the Secretary of Commerce may defer.

Of course, every State law that has some indirect effect on the regulation of the Pacific halibut fishery within Convention waters is not preempted. Cf. Metropolitan Life Insurance Co. v. Massachusetts, 471 U.S. 724, 753-756 (1985). However, State regulations that directly regulate matters that Congress intended the Commission, the regional fishery management councils and the Secretary of Commerce to regulate are preempted within Convention waters.

cc: Jay Johnson
Steve Pennoyer
Eileen Cooney

¹ Compare section 306(a)(3) of the Magnuson Act, 16 U.S.C. § 1856(a)(3), which provides that a State may not directly or indirectly regulate any fishing vessel outside its boundaries, including waters of the EEZ, unless the vessel is registered under the laws of that State. Here Congress actually preserved a regulatory role for the States in the comprehensive federal fishery regulatory scheme implemented by the Magnuson Act. See also the Pacific Salmon Treaty Act, 16 U.S.C. §§ 3631 - 3644, and the Interjurisdictional Fisheries Act, 16 U.S.C. §§ 4101 - 4107, which both provide a regulatory role for the States. Neither the Convention nor the Halibut Act preserve any regulatory role whatever for the States, even within State waters.

ADDENDUM
TO THE
PUBLIC REVIEW DRAFT OF THE HALIBUT CHARTER GHL ANALYSIS

This addendum contains the following changes to the halibut charter GHL analysis:

- Part I. adds a suboption to Issue 3, Option 2, Suboption 2:
"or an amount proportionate to the reduction in abundance (indicated by the CEY)"
- Part II. updates Section 3.1 to incorporate new biological information from the IPHC 1999 halibut stock assessment
- Part III. updates Section 6.3 by providing additional information from agency staff on implementation and enforcement issues.
- it includes a proposal to add temporal adjustments to bag limits to the list of management measures

Prepared by

Staff

North Pacific Fishery Management Council
Alaska Department of Fish and Game

February 1, 2000

PART 1: ERRATA, ISSUE 3, OPTION 2, SUBOPTION 2 (p. 197)

ISSUE 3: Under varying halibut abundance.

Option 1: Status quo. The GHL fixed percentage varies on an annual basis with area halibut abundance.

Option 2: Reduce area-specific GHL ranges during years of significant stock decline. The following suboptions may be instituted in a stepwise fashion, and/or used in combination.

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

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

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

or an amount proportionate to the reduction in abundance (indicated by the CEY)

The bolded text above was added to the trigger levels under Issue 3, Option 2, Suboption 2 but was inadvertently omitted from the public review draft. The language was approved by the Council during its deliberations in December 1999. The intent of the additional trigger level is to link a proportionate reduction of an area-specific GHL range with that of the area-specific CEY determined in the IPHC halibut stock assessment. Staff interprets the time frame to be from one year to the next, i.e., compare the 2001 CEY to the 2000 CEY and adjust the range of fish proportionate to that change in CEY, if the change was negative. A positive change in CEYs would not result in a proportionate increase in the range of fish.

Under this suboption, the GHL range of fish would be adjusted by the decline in CEY. Historical CEYs are presented in Table 1; however, the 1999 CEY reflects the IPHC's current understanding of stock abundance and recruitment. The Area 2C total CEY was reduced by 34% between 1999 and 2000. The Area 3A total CEY was reduced by 40%.

To illustrate its effectiveness, a proportionate reduction to the range of fish by area would be:

For Area 2C, the fixed range of fish associated with the 1995 base year (50 - 62 thousand fish) would be reduced to 33 - 41 thousand fish. This compares to 38 - 50 thousand fish when the combined charter and commercial quota was 6.97 M lb under the 15% suboption, 4.92 M lb under the 20% suboption, and 3.69 M lb under the 25% suboption.

For the 1998 base year, the fixed range of fish associated with the Area 2C 1995 base year (61 - 76 thousand fish) would be reduced 40 - 50 thousand fish. This compares to 46 - 61 thousand fish when the combined charter and commercial quota was 12.52 M lb under the 15% suboption, 8.84M lb under the 20% suboption, and 6.63 M lb under the 25% suboption. A broader discussion of of Suboption 2 is found on p.197 of the public review draft of the GHL analysis.

For Area 3A, the fixed range of fish associated with the 1995 base year (138 - 172 thousand fish) would be reduced to 83 - 103 thousand fish. This compares to 104 - 138 thousand fish when the combined charter and

commercial quota was 5.61 M lb under the 15% suboption, 3.96 M lb under the 20% suboption, and 9 3.6 M lb under the 25% suboption.

For the Area 3A 1998 base year, the fixed range of fish associated with the 1995 base year (155 - 193 thousand fish) would be reduced to 93 - 116 thousand fish. This compares to 116 - 155 thousand fish when the combined charter and commercial quota was 10.01 M lb under the 15% suboption, 7.07 M lb under the 20% suboption, and 5.30 M lb under the 25% suboption. A broader discussion of of Suboption 2 is on p.198.

Table 1A. Estimated setline CEY, staff recommended catch limits, and catch limits of Pacific halibut by IPHC regulatory area (in thousands of pounds, net weight), 1993 - 1999.

Regulatory Area	Estimated Setline CEY						
	1993	1994 ¹	1995 ²	1996	1997	1998	1999
2A	460	490	520		930	1,050	690
2B	9,810	8,320	9,520		15,990	15,380	11,210
2C	10,410	12,660	8,540	Skipped Between Models	11,410	15,480	10,490
3A	23,130	27,020	16,870		33,550	38,710	24,670
3B	4,070	3,580	3,660		11,490	30,990	26,830
4A						11,110	8,420
4B	Area 4	Area 4 =	Area 4 =		Area 4 =	10,210	6,710
4CDE	5,590	5,000	5,920		25,290	13,280	9,800
Total	53,470	57,070	45,030		98,660	136,210	98,820
Regulatory Area	Staff Recommendation						
	1993	1994	1995	1996	1997	1998	1999
2A	460	500	450	520	700	820	690
2B	9,810	9,500	8,500	9,520	12,500	13,460	11,210
2C	10,410	12,000	8,500	9,000	10,000	11,800	10,490
3A	23,130	26,000	20,000	20,000	25,000	29,570	24,670
3B	4,070	4,000	3,700	3,700	9,000	16,300	13,370
4A	2,020	1,800	2,000	1,950	3,000	5,640	4,240
4B	2,020	2,100	1,600	2,310	3,200	5,700	3,980
4CDE	1,520	1,500	2,300	1,660	2,800	3,000	4,130
Total	53,440	57,400	47,050	48,660	66,200	86,290	72,780
Regulatory Area	Catch Limits						
	1993	1994	1995	1996	1997	1998	1999
2A	600	550	520	520	700	820	760
2B	10,500	10,000	9,520	9,520	12,500	13,000	12,100
2C	10,000	11,000	9,000	9,000	10,000	10,500	10,490
3A	20,700	26,000	20,000	20,000	25,000	26,000	24,670
3B	6,500	4,000	3,700	3,700	9,000	11,000	13,370
4A	2,020	1,800	1,950	1,950	2,940	3,500	4,240
4B	2,300	2,100	2,310	2,310	3,480	3,500	3,980
4CDE	1,720	1,500	1,660	1,660	2,580	3,500	4,450
Total	54,340	56,950	48,660	48,660	66,200	71,820	74,060

¹ Average of standard and alternative (conservative) assessments

² From 1995 on, CEY based on projected rather than lagged ebio

PART II: REVISED SECTION 3.1, IPHC UPDATE (p. 30)

The proposed alternatives in this analysis address an allocation of halibut between the commercial fixed gear and recreational charter sectors. The two main criteria that determine if and when the GHs, as presented in this analysis, will be reached or exceeded are: (1) the status of the halibut biomass and future biomass projections, and (2) charter effort and projected growth of harvest. This section provides the baseline data from the IPHC halibut stock assessment and descriptions of halibut harvests and participation by fishery sector and area that are used in Sections 4 - 6 to prepare the RIR. Lastly, halibut biomass and charter fishery projections as presented to the Council in 1993 and 1997, from the 1999 IPHC stock assessment and as currently updated for the 2000 fishing year, are discussed.

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

3.1.1 Method of Quota Calculation (from Clark and Parma 1998, 1999)

The halibut resource is healthy and total removals were at record levels in 1999, which ranked in the top five highest years at over 98 million lb (Table 3.1). Record high sport fisheries occurred in 1998 and commercial fisheries in 1999. The 1998 and 1999 total removals of halibut off the Pacific coast for all areas by commercial catch, sport harvest, bycatch mortality, personal use and wastage that were used by the IPHC in its stock assessment are presented in Figure 3.1.

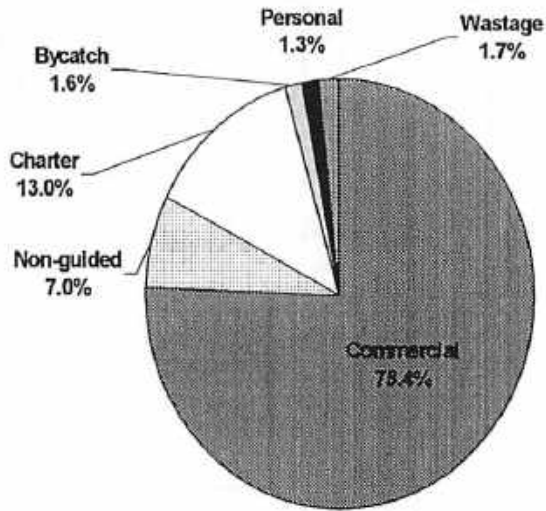
Table 3.1a. Pacific halibut removals by regulatory area and sector in 1998 (thousand lb net wt.)

Area	2A	2B	2C	3A	3B	4	Total
Commercial	464	13,139	10,228	25,874	11,346	9,150	70,201
Sport	383	657	2,708	5,176	23	61	8,400
Bycatch Mortality:							
Legal-sized fish	381	108	218	1,490	744	3,645	6,586
Sublegal-sized fish	233	135	143	1,362	730	3,915	6,518
Personal Use	15 ¹	300	170	74	20	162	741
Wastage:							
Legal-sized fish	3	53	51	155	57	46	365
Sublegal-sized fish	4	378	180	580	290	176	1,608
Total	1,483	14,770	13,698	34,711	13,210	17,155	94,419

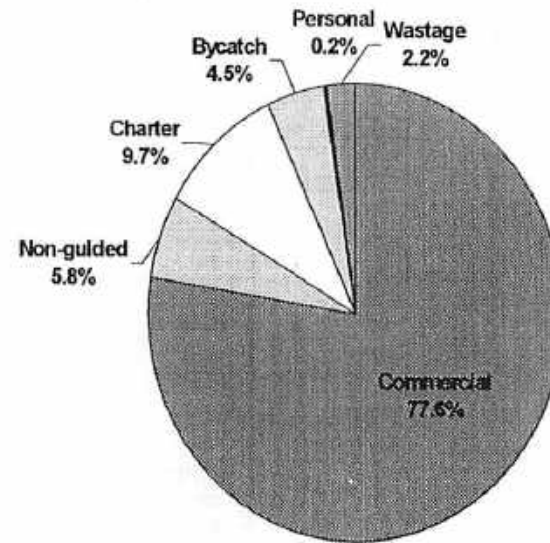
Table 3.1b. Pacific halibut removals by regulatory area and sector in 1999 (thousand lb net wt.)

Area	2A	2B	2C	3A	3B	4	Total
Commercial	446	12,732	10,202	25,287	13,873	11,878	74,418
Sport	338	1,582	1,830	5,243	22	108	9,122
Bycatch Mortality:							
Legal-sized fish	380	110	230	1,600	880	3,460	6,660
Sublegal-sized fish	234	94	123	1,287	786	3,712	6,236
Personal Use	15	300	170	74	20	170	734
Wastage:							
Legal-sized fish	6	38	72	101	69	107	393
Sublegal-sized fish	2	330	162	421	253	155	1,323
Total	1,421	15,186	12,789	34,013	15,903	19,590	98,886

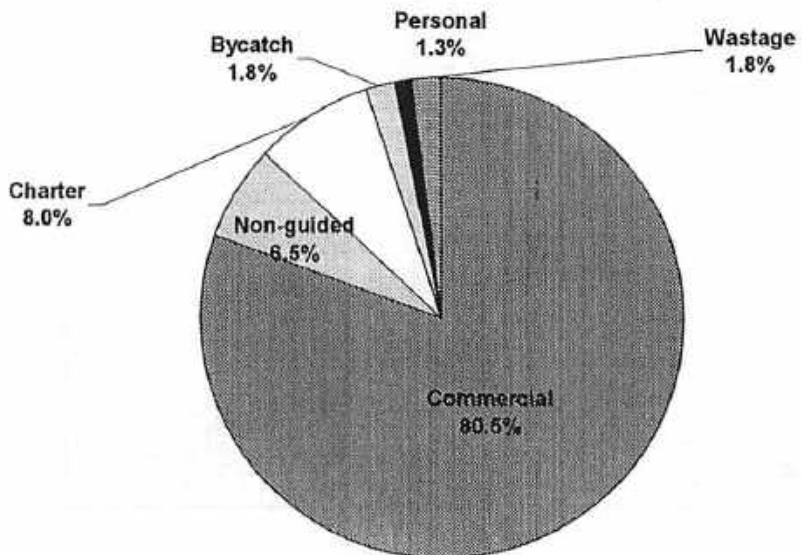
Removals of Pacific Halibut in Area 2C, 1998



Removals of Pacific Halibut in Area 3A, 1998



Removals of Pacific Halibut in Area 2C, 1999



Removals of Pacific Halibut in Area 3A, 1999

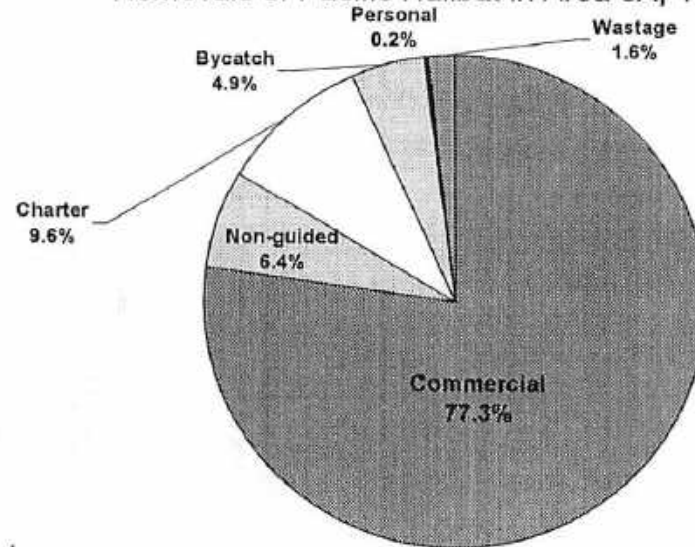


Figure 3.1. Pacific halibut removals in Areas 2C and 3A, 1998-99.

Each year the IPHC staff assesses the abundance and potential yield of Pacific halibut using all available data from the commercial fishery and scientific surveys. The exploitable biomass (yield) is estimated to set quotas for ten regulatory areas by fitting a detailed population model to the data from that area (Figure 3.2). A biological target level for total removals is then calculated by multiplying a fixed harvest rate—presently 20%—to the estimate of exploitable biomass. This target level is called the “constant exploitation yield” or CEY for that area in the coming year. The CEY therefore changes annually in proportion to the exploitable biomass. Each CEY represents the total allowable harvest (in lb) for that area, which can not be exceeded. The IPHC then estimates the sport and personal use/subsistence harvests and wastage and bycatch mortalities for each area. These are subtracted from the CEY and the remainder may be set as the catch quota for each area’s directed commercial setline (longline) fishery. Staff recommendations for quotas in each area are based on the estimates of setline CEY but may be higher or lower depending on a number of statistical, biological, and policy considerations. Similarly, the Commission’s final quota decisions are based on the staff’s recommendations but may be adjusted for conservation considerations.

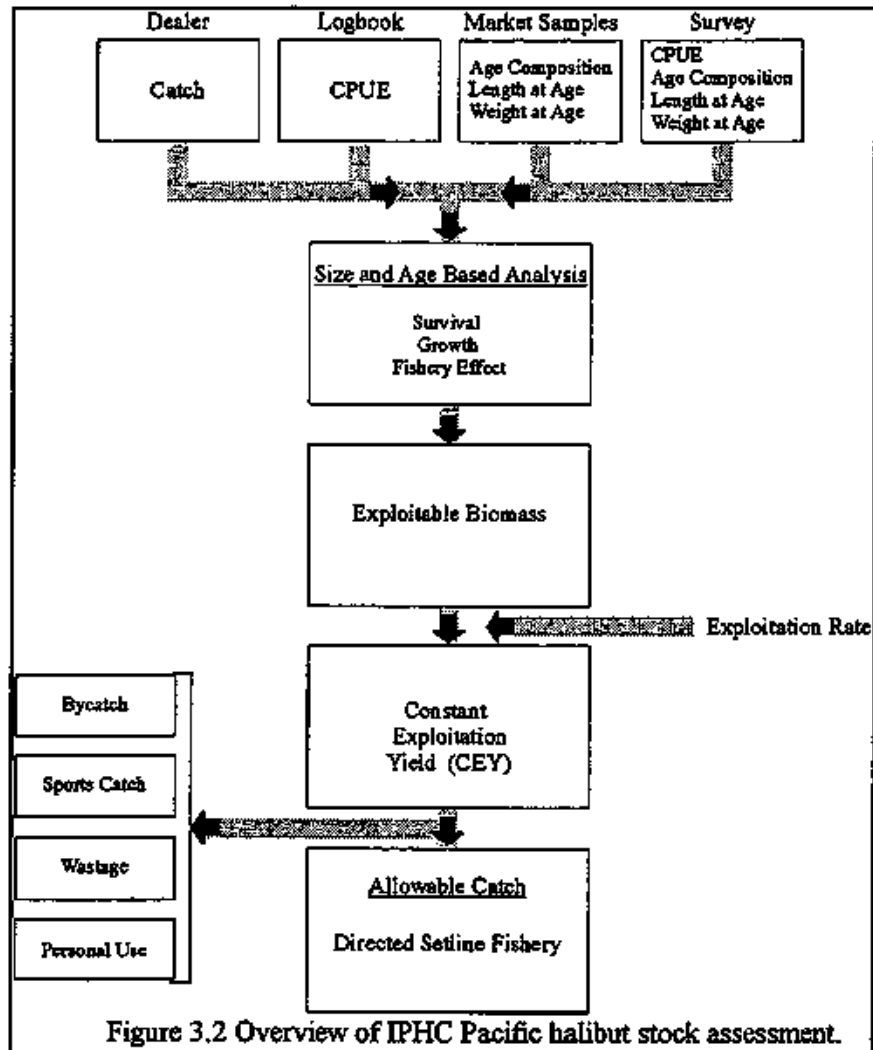


Figure 3.2 Overview of IPHC Pacific halibut stock assessment.

From 1982 through 1994, stock size was estimated by fitting an age-structured model (CAGEAN) to commercial catch-at-age and catch-per effort data. In the early 1990s it became apparent that age-specific selectivity in the commercial fishery had shifted as a result of a decline in halibut growth rates, which was more dramatic in Alaska than in Canada. An age- and length-structured model was developed and implemented in 1995 that accounted for the change in growth. It also incorporated survey (as well as commercial) catch-at-age and catch-per effort data. The survey data contain much more information on younger fish, many of which are now smaller than the commercial size limit, and are standardized to provide a consistent index of relative abundance over time and among areas.

At first the model was fitted on the assumption that survey catchability and length-specific survey selectivity were constant, while commercial catchability and selectivity were allowed to vary over time (subject to some restraints). The resulting fits showed quite different length-specific survey selectivities in Area 2B and 3A, however, which suggested that age could still be influencing selectivity. To reflect that possibility, the new

model has been fitted in two ways since 1996: by requiring constant length-specific survey selectivity (as in 1995), and by requiring constant age-specific survey selectivity. The age-specific fits generally produce lower estimates of recent recruitment and therefore present abundance, and to be conservative the staff has used those estimates to calculate CEY's.

With either fitting criterion, the abundance estimates depend strongly on the natural mortality rate M used in the population model. Until 1998, the estimate $M = 0.20$ had been used in all assessments. This estimate is quite imprecise, and an analysis done by the staff suggested that a lower working value would be appropriate. The value $M = 0.15$ was chosen and used as a standard, which lowered abundance estimates in the 1998 assessment by about 30%.

The only significant change to the assessment in 1999 was introducing an increase in setline survey catchability, beginning with the 1993 survey data, to account for a change in bait between the 1980s and the 1990s. When setline surveys resumed in 1993 (after being suspended since 1986), chum salmon was adopted as the standard bait, whereas in the 1980s the bait was herring and salmon on alternate hooks. Experiments done within the last year showed that salmon bait catches 50-150% more halibut than herring. Further experiments are planned for this summer in which mixed bait will be compared directly with salmon. In the meantime, a working value of 100% was used in the assessment. This translates to a 33% increase in overall survey catchability after the 1980s. (For every two hooks, in terms of hooks baited with salmon, the survey switched from the equivalent of $1\frac{1}{2}$ hooks to 2 hooks, an increase of one third.)

Increasing survey catchability by 35% in the 1990s to account for the bait change has the effect of reducing the apparent increase in halibut abundance since the 1980s by 25%, but it does not reduce the estimates of 1999 biomass by the same amount because other things play a role, including commercial catch per effort. As a result, the estimate for 1999 for Area 2C decreased by about 20% and for Area 3A decreased by almost 30%.

The addition of the 1999 commercial data can affect the 1999 estimates through the commercial CPUE, the age composition of the catch, and the mean weight at age in the catch. The only sizable effect was a large decrease in the Area 3A estimate caused almost entirely by an ongoing decline in the mean weights. It appeared to have leveled off in the mid-1990s, but it has resumed in Areas 2C and 3A since 1997, reducing biomass estimates in Alaska by a full 20% over the last two years.

When the estimated numbers at age are projected forward to 2000 (using the 1999 mean weights to calculate biomass), the change in the biomass estimate depends on the estimated abundance of all the year-classes in the stock, which at ages 8 to 20 in 2000 will be the 1980 through 1992 year-classes. Generally the year-classes coming into the stock are now weaker than the ones passing out of it, so the projections for 2000 are lower than the 1999 estimates. The drop is bigger in 3A (20%) than in Area 2C (10%) because the assessment shows that recruitment to 3A peaked in 1980 and has been declining steeply, to levels that are now on a par with the mid-1970s. In Area 2C, the 1987 and 1988 year-classes were strong, and the most recent ones appear to be mediocre but not as poor as in Area 3A.

In summary, this year's estimates are substantially lower than last year's because of the allowance for increased survey catchability, lower mean weights at age, and recent declines in recruitment. A change to the data going into the model for 2000 lowered the setline survey catch rates from the 1990s to account for a bait change, which reduced the population estimates by 20-30% in the eastern and central Gulf of Alaska (Areas 2 and 3A). A continuing decline in size at age also affected the estimates in Area 2C and Area 3A. Very low estimated recruitment in Area 3A in recent years implies a rapidly declining biomass in that area, but trawl surveys indicate continuing high abundance of 60-80 cm fish in that area, so more data is need to verify these estimates. However, it does now appear that recruitment has declined from the high levels of 1985-1995. In Alaska (2C and 3A) the cumulative effect is a 35-40% reduction in biomass.

A review of Pacific halibut biology and biomass can be found in IPHC (1998). Further details on the history of IPHC assessment methods and harvest strategy are given below and in a detailed account of the 1997 assessment (Sullivan et al. 1999) (see box below).

RECENT CHANGES IN IPHC ASSESSMENT METHODS AND HARVEST POLICY

1982-1994: stock size was estimated with CAGEAN, a strictly age-structured model fitted to commercial catch-at-age and catch-per-effort data. Because of a decrease in growth rates between the late 1970s and early 1990s, there were persistent underestimates of incoming recruitment and total stock size in the assessments done in the early 1990s.

Until 1985, allowable removals were calculated as a proportion of estimated annual surplus production (ASP), the remaining production being allocated to stock rebuilding. In 1985 the Commission adopted a constant harvest rate policy, meaning that allowable removals are determined by applying a fixed harvest rate to estimated exploitable biomass. This harvest level is called the Constant Exploitation Yield, or CEY. The fixed harvest rate was set at 28% in 1985, increased to 35% in 1987, and lowered to 30% in 1993.

1995: a new age- and length-structured model was implemented that accounted for the change in growth and was fitted to survey as well as commercial catch-at-age and catch-per-effort data. The new model produced substantially higher biomass estimates. In Area 3A this resulted from accounting for the change in growth schedule. In Area 2B, where the change in growth had been much less than in Alaska, it resulted from fitting the model to survey catch-per-effort, which showed a larger stock increase since the mid-1980s than commercial catch-per-effort. Quotas were held at the 1995 level to allow time for a complete study of the new model and results,

1996: differences in estimated selectivity between British Columbia and Alaska led to the consideration of two alternatives for fitting the model, one in which survey selectivity was a fixed function of age and the other in which it was a function of length. Spawner-recruit estimates from the new model resulted in a lowering of the target harvest rate to 20%. Quotas were increased somewhat, but not to the level indicated by the new biomass estimates.

1997: setline surveys of the entire Commission area indicated substantially more halibut in western Alaska (IPHC Areas 3B and 4) than the analytical assessment. Biomass in those areas was estimated by scaling the analytical estimates of absolute abundance in Areas 2 and 3A by the survey estimate of relative abundance in western Alaska. CEY estimates increased again, and quotas were increased again, but still to a level well below the CEY's.

1998: the working value of natural mortality was lowered from 0.20 to 0.15, reducing analytical estimates of biomass in Areas 2 and 3A by about 30%. At the same time setline survey estimates of abundance in Areas 3B and 4 relative to Areas 2 and 3A increased, so biomass estimates in the western area decreased by a smaller amount.

1999: setline survey catch rates in the 1990s were adjusted downward to account for the effect of changing to all-salmon bait when the surveys resumed in 1993. This reduced biomass estimates by 20-30%.

3.1.2 Current Estimates of exploitable biomass and CEY (from Clark and Parma 1998, 1999 and Gilroy 1999)

The target harvest rate of 20% was chosen on the basis of calculations of stock productivity that used a coastwide average of the estimates of commercial selectivity from the age-specific fit of the model, so the biomass estimates from the age-specific fits are used to calculate exploitable biomass and CEY. Overall the estimated setline CEY is approximately 63 million lb (Table 3.2), down from 99 million lb in 1998 and 136 million lb in 1997.

Table 3.2. Exploitable biomass estimates and catch limit recommendations.

Area	2A	2B	2C	3A	3B	4A	4B	4CDE	Total
1999 exploitable biomass (from the 1998 assessment)	5.36	61.64	64.00	159.00	138.33	46.11	34.98	58.83	568.25
1999 Setline CEY (from the 19998 assessment)	0.69	11.21	10.49	24.67	26.83	8.42	6.71	9.80	98.82
1999 quota	0.76	12.10	10.49	24.67	13.37	4.24	3.98	4.45	74.06
2000 exploitable biomass (from the 1999 assessment)	4.44	51.06	42.20	94.90	96.80	36.10	35.10	35.10	395.70
Total CEY at 20%	0.89	10.21	8.44	18.98	19.36	7.22	7.02	7.02	79.14
Non-commercial removals									
Bycatch	0.38	0.11	0.23	1.60	0.88	0.58	0.22	2.83	6.83
Sport catch	0.34	1.58	1.83	5.24	0.02	0.10	0.00	0.01	9.12
Personal use	0.00	0.30	0.00	0.10	0.04	0.08	0.00	0.01	0.53
Wastage	0.01	0.04	0.07	0.10	0.07	0.04	0.04	0.04	0.39
2000 Setline CEY	0.54	8.18	6.31	11.94	18.36	6.42	6.77	4.13	62.65
2000/1999 total CEY	0.83	0.83	0.66	0.60	0.70	0.78	1.00	0.60	0.70
2000/1999 setline CEY	0.79	0.73	0.60	0.48	0.68	0.76	1.01	0.42	0

3.1.3 Analytical estimates of abundance in 1999 (from Clark and Parma 1999)

The IPHC stock assessment shows a strong 1987 year-class. The age- and length-based models show a drop in recruitment after that year-class, but these age-groups (ages 8-10 in 1998) are still estimated imprecisely.

Figure 3.3 shows estimated recruitment at age 8 and total biomass of fish aged 8 and older for both models. The two results are very similar in Area 2C and Area 3A until the last few years. An important change from the 1997 assessment is that in 1998 both the age- and length-specific fits in Area 3A show a downturn in recruitment after the 1987 year-class. The 1997 results showed that the length-specific fit indicated recruitment would continue at approximately the level of the 1987 year-class. The change resulted mainly from the screening and heavier weighting of size-at-age data.

Biomass changes in Areas 2C and 3A have occurred as a result of changes to the stock assessment model more than as a result of biological changes. In the absence of model changes, short-term fluctuations in exploitable biomass, and therefore in quotas, should be small.

Recruitment represents a small fraction of the exploitable biomass, and has a small annual effect. Increased selectivity over ages 8- to 12-yrs accounts for the majority of biomass added annually to offset natural mortality. The very large exploitable biomass relative to recruitment buffers the population from changes. However, because exploitable biomass has been at a high level, and because recruitment has declined over the past several years, lower exploitable biomass is more probable than higher exploitable biomass for the next five years.

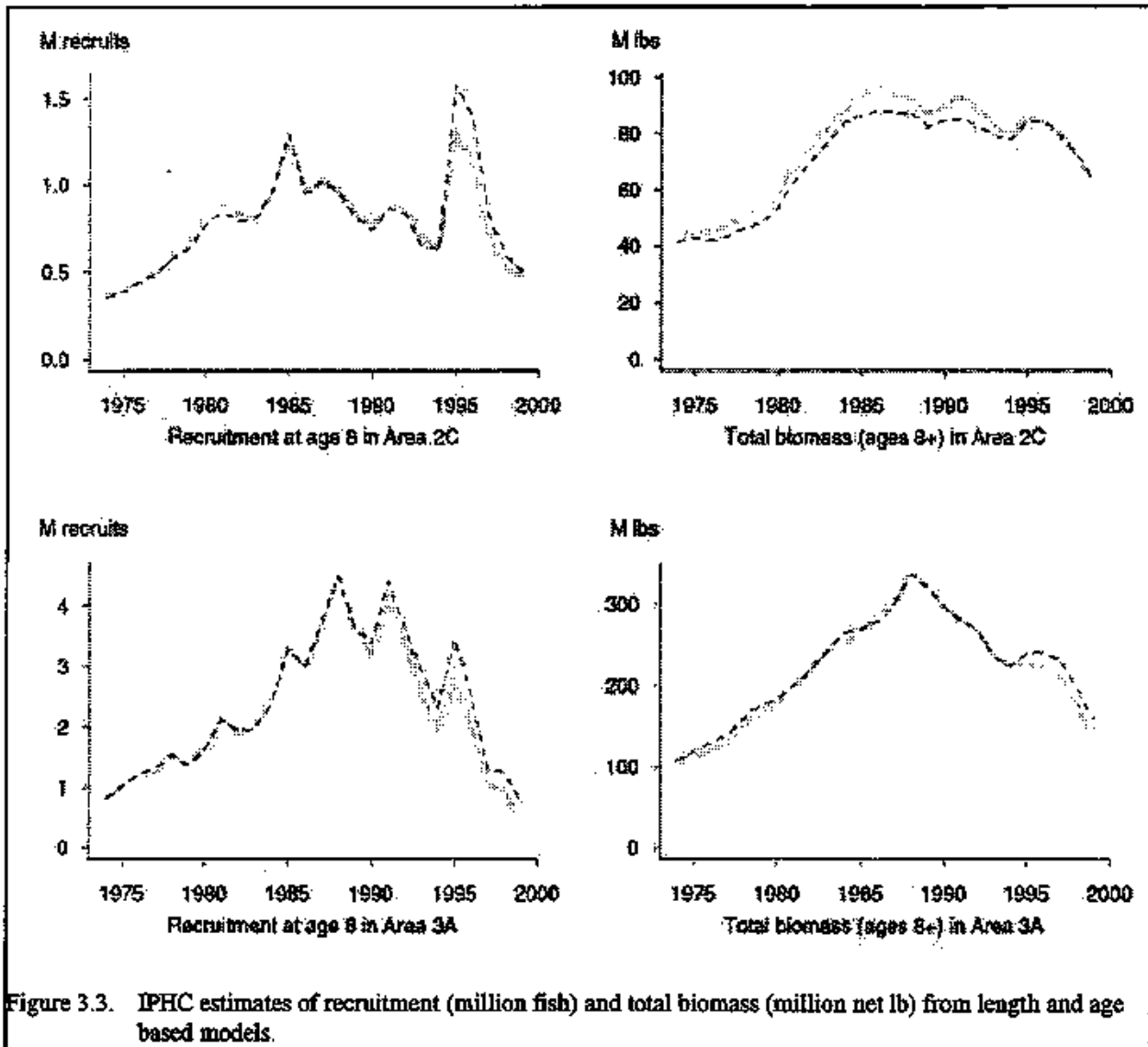


Figure 3.3. IPHC estimates of recruitment (million fish) and total biomass (million net lb) from length and age based models.

3.1.4 Halibut biomass and quotas projections in Areas 2C and 3A (NPFMC 1997, Clark and Parma 1999)

Vincent-Lang and Trumble (1993) jointly reported that the coast-wide exploitable halibut biomass declined by 25% from 359 to 266 million lb during 1988 -92, while the sport harvest increased about 40%. In 1993, exploitable biomass was declining at about 10% per year. During 1993-97, biomass was predicted to continued to decline at annual rates of 9, 7, 5, 3, and 1% per year. Halibut biomass was then predicted to increase from 1998 through 2000 at 1, 3, and 5% per year, respectively, due to increasing recruitment (Table 3.3, labeled '1993 Projections'). Commercial harvests were characterized as a function of declining halibut biomass and increasing sport harvest. The 1999 exploitable biomass was projected in 1993 to be 175 M lb. In 1999, IPHC staff estimated it to be 396 M lb.

Table 3.3. Comparison of 1993 and 1997 projections of exploitable biomass with 1999 IPHC data (millions of lbs).

Year	1993 Projections ¹		1997 Projections ²			1999 Biomass ³
	1993 projections of % biomass change	1993 exploitable biomass projections	1997 expected value	1997 lower bound	1997 higher bound	Actual exploitable biomass
1993	-9	198				456
1994	-7	185				456
1995	-5	175				447
1996	-3	170				454
1997	-1	168				451
1998	1	170	429	295	563	433
1999	3	175	412	270	555	396
2000	5	184	388	260	516	380
2001			363	255	470	365
2002			341	246	436	350
2003			323	233	414	336
2004			311	219	403	323
2005			302	203	402	310
2006			297	189	404	298
2007			293	177	409	286
2008			292	167	416	274

¹1993 Projections represent exploitable biomass for state of Alaska (Trumble and Vincent-Lang 1993).

²1997 Projections represent exploitable biomass for combined Areas 2A, 2B, 2C, 3A, and 3B (NPFMC 1997).

³Estimates of actual exploitable biomass based on 1998 IPHC assessment data for combined Areas 2A, 2B, 2C, 3A, and 3B.

⁴Projections represent exploitable biomass reduced by an average 4%.

It now appears likely that coastwide recruitment has declined from the high levels of the 1985-95 period, and size at age is still going down. Thus while abundance in number is still quite high relative to the levels of 1975 or 1980, biomass levels are not as good and the prospect is for a continuing decline as relatively strong year-classes pass out of the stock and relatively weak ones enter (and grow more slowly).

The prospect is worst in Area 3A, but the apparent near-failure of recruitment there may not be real. NMFS trawl surveys indicate a much higher abundance of 8-year-old halibut in Area 3A than the IPHC analytical assessment based on setline data. This is a puzzle, because for legal-sized halibut trawl and setline surveys agree reasonably well on trends in relative abundance, but since 1990 trawl survey catch rates of sublegal halibut have greatly outpaced setline survey catch rates.

Another cause for suspicion is the re-emergence of a retrospective pattern in the Area 3A estimates, with the estimate of exploitable biomass in a given year increasing in each succeeding assessment. This is consistent with an over-estimate of the selectivity of young fish, whose abundance is consequently underestimated initially. The estimate is then corrected in later assessments as the year-class moves through the fishery. In the past this pattern was caused by declining size at age, but size at ages 8 and below has changed very little, so some other factor must be at work. It therefore seems very possible that exploitable biomass in 3A is underestimated and that incoming recruitment will turn out to be no worse in 3A than in 2AB and 2C. But even that would be low by recent standards. Biomass projections for 2000 are predicted to decline by 9% overall, and 14% for Area 2C and 21% for Area 3A. These will likely result in even lower commercial quotas in 2001.

Since the development of the 1993 projections, major changes in our understanding of the status of the halibut stock have occurred. In 1995, a new age- and length-structured model was developed by IPHC to account for an apparent 20% decrease in the length-at-age of halibut. It produced substantially higher biomass estimates. In 1996, revised spawner-recruit estimates resulted in lowering the target harvest rate to 20%. Quotas were increased somewhat, but below the level indicated by the new biomass estimates. In 1997, biomass estimates and quotas increased again, but still well below levels the IPHC model allowed. In 1998, the estimate of natural mortality was lowered from 0.20 to 0.15, reducing biomass estimates in Areas 2 and 3A by about 30%. In 1999, setline survey catch rates in the 1990s were adjusted downward to account for the effect of changing to all-salmon bait when the surveys resumed in 1993, which reduced biomass estimates by 20-30%.

In 1997, Council staff prepared an analysis that differed from the 1993 reports in its projections of future halibut biomass. The 1997 Council analysis projected that, using an overall exploitation rate of 18% in 1998 and 20% every year thereafter, the expected halibut biomass would decrease by 32% between 1998 and 2008, from an estimated 429 to 292 million lb for the combined Areas 2A-3B.

The stock recruitment model used to generate the projections allowed for a great deal of unpredictable variability induced by the environment; thus, the projections had very wide confidence intervals. Regardless, they represented a substantially slower decline in exploitable halibut biomass than originally estimated in the 1993 report. The coastwide schedule used in the 1980s and early 1990s had higher selectivity-at-age among the younger age groups and so would produce higher estimates of exploitable biomass if applied to the present estimates of numbers-at-age (Clark, pers. commun.).

The projections of exploitable halibut biomass made in 1993 (Vincent-Lang and Trumble) and 1997 (NPFMC) are compared with actual levels in 1994-99 (Table 3.3). Estimates of exploitable biomass from the 1999 IPHC assessment are calculated using the coastwide fixed selectivity schedule which was adopted in 1996. Actual levels appear to fall within the projected range for 1997 and 1998 from the 1997 Council analysis. In fact, the actual 1999 exploitable biomass level (396 M lb) is only slightly below its expected value (412 M lb) from the 1997 projections, but is considerably higher than predicted in 1993 (175 M lb).

Over the last 20 years halibut growth and recruitment rates in Alaska have varied widely, apparently because of changes in the environment rather than any effects of fishing. As a result, projections incorporating a reasonable range of values for growth and recruitment success always diverge rapidly from estimates of present stock size, in both directions. The IPHC staff has calculated such projections from time to time for the purpose of evaluating the robustness of alternative harvest rates, but it does not do so routinely because the projections are so variable (Clark, pers. commun. 1999).

Recruitment represents a small fraction of the exploitable biomass and has a small annual effect. Increased selectivity over ages 8- to 12-yrs accounts for the majority of biomass added annually to offset natural mortality. The very large exploitable biomass relative to recruitment buffers the population from changes. However, because exploitable biomass has been at a high level, and because recruitment has declined over the past several years, lower exploitable biomass is more probable than higher exploitable biomass for the next five years.

Exploitable biomass in Areas 2C and 3A are predicted to decline by 14% and 21% respectively between 1999 and 2000. Applying those rates of decline over the next five years, would predict that Area 2C may be as low as 35 M lb by 2003 and Area 3 may be as low as 62 M lb (Figure 3.4). There is no scientific justification to extend next year's projected decline out for five years, it was done to illustrate the range of potential future exploitable biomasses for Areas 2C and 3A based on the information that is currently available. Therefore, the 1997 analysis projections continue to appear appropriate for estimating future exploitable biomass levels in the near term.

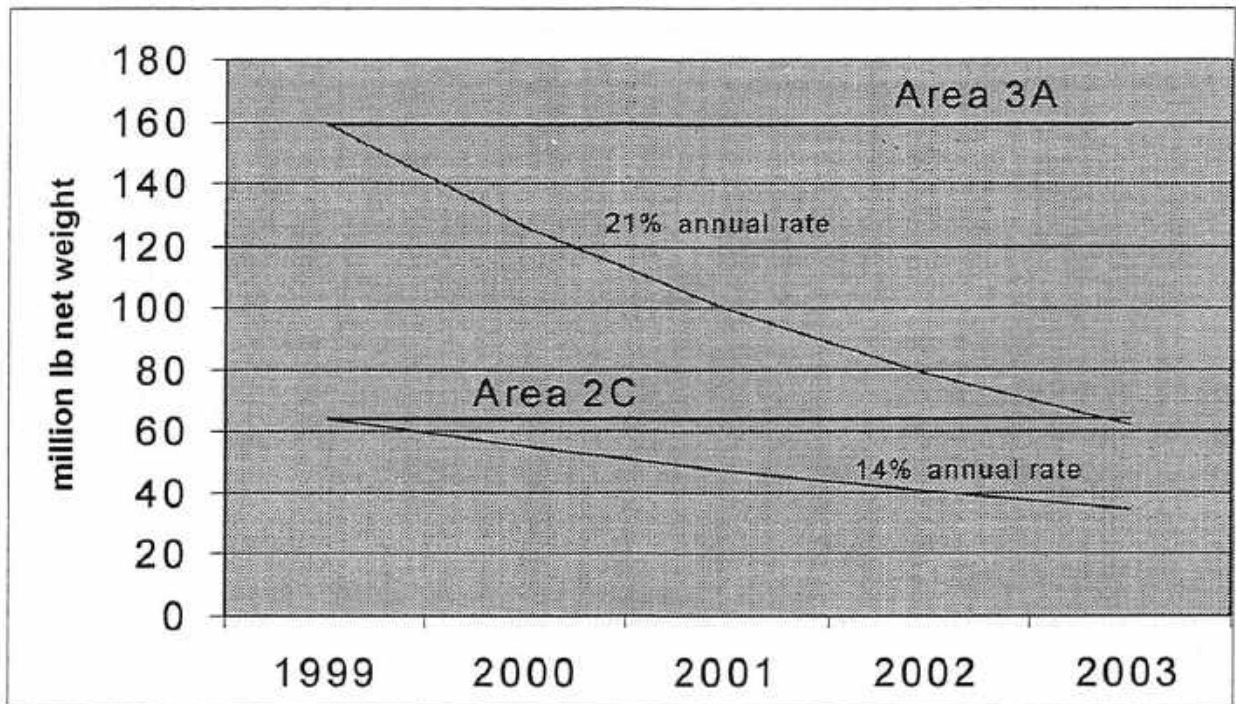


Figure 3.4 Five year projected biomass scenarios under constant and declining assumptions. (14% decline for Area 2C and 21% decline for Area 3A).

Summary

The halibut resource is healthy and total removals are at record levels, however, recruitment and biomass have peaked. Changes for Areas 2C and 3A over the past several years occurred as a result of changes to the stock assessment model more than as a result of biological changes. The Area 2C quota was set at 8.4 M lb, down from 10.5 M lb in 1999. The 2000 Area 3A quotas was set at 18.3 M lb, down from 24.7 M lb in 1999 (Table 3.4). Quotas should not change appreciably over the next few years (Clark and Parma 1999).

Halibut harvests in 1998 in Area 2C totaled 13.0% and 75% of total removals for the charter and commercial fisheries, respectively. In 1999, charter harvest was 8.0% and commercial harvest was 81%. In Area 3A, those fisheries harvested 9.7% and 78%, respectively, in 1998 and 9.6% and 77% in 1999. Non-guided sport halibut anglers harvested 7.0% in 1998 and 6.5% in 1999 in Area 2C and 5.8% in 1998 and 6.4% in 1999 in Area 3A.

The 1997 projections of halibut exploitable biomass appear to accurately reflect current levels. It would be appropriate to continue to apply those projections in the short term.

Lastly, to illustrate the effect of declining size at age, assume the Council set the GHL at 12% in numbers of fish set during a period of peak halibut abundance (either 1995 or 1998 base year). Further assume that the average weight in the charter catch is about the same as the average weight in the commercial catch. During the mid to late 1990's, commercial catches have averaged about 1 million fish. At 12%, the charter fleet would be awarded 136,000 fish ($136,000 / (1,000,000 + 136,000) = 12\%$) to take in perpetuity. Over the past few years, the average weight of fish ages 10-15 (which constitute the bulk of the catch) is around 25 pounds. In the mid-1970s, the average weight was slightly greater than 50 pounds. Should a return occur to low productivities that were seen in the mid 1970s and with commercial quotas at around 10 million lb (200,000 fish), it is possible that the charter fleet, having been awarded 136,000 fish (using a 1995 base year) would then be allocated 68% of the combined charter/commercial quota.

Table 3.4. Total removals of Pacific halibut (thousands of pounds, net weight) in IFHC Areas 2C and 3A																
	Area 2C				Area 3A				TOTAL	Persead Use	Wastage	Non-ch	Charter	Sport	Wastage	Persead Use
	Catch Limit	Comm Catch	Legal-Size Bysatch	Sport	Catch Limit	Comm Catch	Legal-Size Bysatch	Sport								
1977		3,190	410	72	n/a	n/a	3,672	8,640	3,370	196	n/a	n/a	n/a	n/a	n/a	n/a
1978		4,320	210	82	n/a	n/a	4,612	10,300	2,440	282	n/a	n/a	n/a	n/a	n/a	n/a
1979		4,350	640	174	n/a	n/a	5,344	11,340	4,490	365	n/a	n/a	n/a	n/a	n/a	n/a
1980		3,240	420	332	n/a	n/a	3,992	11,970	4,930	488	n/a	n/a	n/a	n/a	n/a	n/a
1981	3,400	4,010	400	318	n/a	n/a	4,728	14,220	3,950	751	n/a	n/a	n/a	n/a	n/a	n/a
1982	3,400	3,900	200	489	n/a	n/a	4,189	13,330	3,200	716	n/a	n/a	n/a	n/a	n/a	n/a
1983	3,400	6,400	200	553	n/a	n/a	7,153	14,110	2,080	945	n/a	n/a	n/a	n/a	n/a	n/a
1984	5,700	5,850	210	621	n/a	n/a	6,681	19,970	1,510	1,026	n/a	n/a	n/a	n/a	n/a	n/a
1985	9,000	9,210	200	682	n/a	n/a	10,092	20,850	800	1,210	n/a	n/a	n/a	n/a	n/a	n/a
1986	11,200	10,610	200	730	n/a	n/a	11,540	28,100	670	1,908	n/a	n/a	n/a	n/a	n/a	n/a
1987	11,500	10,680	200	780	n/a	n/a	12,188	31,000	1,590	1,989	n/a	n/a	n/a	n/a	n/a	n/a
1988	11,500	11,370	200	1,076	528	n/a	13,023	36,000	2,130	3,264	n/a	n/a	n/a	n/a	n/a	n/a
1989	9,500	9,330	200	1,559	377	n/a	11,635	33,730	1,800	3,005	n/a	n/a	n/a	n/a	n/a	n/a
1990	8,000	9,730	680	1,330	346	n/a	12,214	31,000	2,630	3,638	n/a	n/a	n/a	n/a	n/a	n/a
1991	7,400	8,650	550	1,654	474	n/a	12,091	26,600	3,130	4,264	n/a	n/a	n/a	n/a	n/a	n/a
1992	10,000	9,820	570	1,668	477	n/a	12,820	26,600	2,640	3,899	n/a	n/a	n/a	n/a	n/a	n/a
1993	10,000	11,290	330	1,811	392	n/a	13,900	20,700	1,920	5,265	n/a	n/a	n/a	n/a	n/a	n/a
1994	11,000	10,380	400	1,986	361	n/a	15,244	26,000	2,350	4,511	n/a	n/a	n/a	n/a	n/a	n/a
1995	9,000	7,760	240	1,751	384	n/a	11,631	20,000	1,570	4,501	2,537	1,938	1,652	539	97	97
1996	9,000	8,800	230	1,651	129	n/a	12,518	20,000	1,400	4,825	2,839	1,662	587	587	97	97
1997	10,000	9,890	240	1,712	186	n/a	13,737	25,000	1,550	5,641	2,885	1,940	744	744	97	97
1998	10,500	10,230	220	2,788	183	n/a	12,720	26,000	1,490	5,176	3,512	2,129	735	735	74	74
1999	10,490	10,202	233	1,920	231	n/a	12,759	24,670	1,595	5,242	3,238	2,090	522	522	74	74
2000	8,400				234	n/a	18,310									

Source: IFHC and AIF&G (1994-99 sport harvest)

PART III: SECTION 6.3, IMPLEMENTATION AND ENFORCEMENT (p. 200)

Implementation Strategies

It is essential that the Council adopt a strategy that is implementable and cost effective, allows for the use of the best available information, and provides for adaptability. Three significant questions exist with regard to implementation of any Halibut Charterboat GHL option currently under consideration by the NPFMC. These are:

- (1) What information will be used to assess harvest?
- (2) How will specific management measures be selected and implemented?
- (3) How should the management objective for harvest be stated?

Harvest Estimation: At the present time, several data collection programs are fielded by the Alaska Department of Fish and Game to assess charter fishery performance including:

1. *Statewide Mail Survey.* This mail survey is used to estimate sport fishing and harvest on a statewide basis. Within these estimates are estimates of the charter and non-charter recreational harvest and release of halibut.
2. *Statewide Guide Registration.* This statewide registration program is used to track the number of sport fishing guides and guide business that are operating in Alaska's fresh and marine waters annually. Within this database are the number of businesses and guides that target halibut.
3. *Statewide Marine Logbook.* This logbook provides estimates of recreational effort and harvest on marine charters operating off the coast of Alaska. Included are estimates of halibut harvests and participation by charters in the halibut fishery.
4. *Port Sampling.* This program provides estimates of the average size and age of the recreationally caught halibut in the major ports of landing in Areas 2c and 3A.
5. *Creel Surveys.* The Division uses creel surveys in select areas to estimate recreational effort and harvest. One such survey is used to estimate king salmon harvest in southeast Alaska. This survey also provides partial estimates of halibut harvest. Similar surveys are used selectively in southcentral Alaska and provide partial estimates of halibut harvest.

Each of these programs has strengths and limitations. Creel surveys provide valuable first hand observations of the fishery but they are very expensive and lack full geographical coverage. Port sampling provides biological information and important fishery statistics including areas of landings and fishing effort, but is expensive and does little to help assess total area harvest. The Department's charter logbook program shows great promise but this is a very new program and the need still exists to build a longer time series of data, ground truth it, and evaluate the accuracy of the estimates. The Statewide Mail Survey, a postseason survey, is a long time series data set that provides excellent geographical coverage, is reasonably accurate and cost effective but the estimates of harvest are not available for up to one year after the fishing season in question. In total, the Alaska Department of Fish and Game currently spends about \$300,000 to \$350,000 annually in these programs to collect information on the halibut sport fishery.

Because no specific management program has been in effect for the halibut charter fishery, it should be recognized that none of these assessment programs have demonstrated utility under the allocation/management options under consideration. Until such time as each tool's utility is proven, it will be necessary for harvest estimates to be based on an aggregation of the best available information.

Management measure selection: The Council has identified 11 management measures which could be used to adjust harvest in an effort to maintain the charter fishery within the allocation provided under a GHL or other harvest allocation plan. These are: line limits, boat limits, annual angler limits, vessel trip limits, bag limits, super-exclusive registration, sport catcher vessel only areas, sport fish reserves, rod permits, possession limits, and restrictions on retention of halibut by skipper and crew.

One additional measure involves temporally adjusting bag limits pre-season. This option was not considered in the public review draft EA/RIR/IFRA distributed on January 10, 2000. It was generally discussed by the Council during their deliberations of this issue and is being recommended by the state as another management option for Council consideration. Based on the ADFG logbook program, it is estimated that enactment of a one fish bag limit during specific periods of the open season could potentially reduce harvest 1% to 45% in Areas 2C and 3A (Table 6.18). Smaller reductions would be realized by limiting the bag limit to 1 during May and June with larger reductions being realized by limiting the bag limit to 1 during the peak months (June, July, or August) of the fishery (Figures 6.5 and 6.6). A total season restriction of the bag limit to 1 would reduce harvest by about 40% in Area 2C and 45% in Area 3A.

Each of the above management measures will have a different and unique effect on harvest potential. Additional information is provided for different levels of line limits in Table 6.19. This effect will likely vary from area to area and will be influenced by changes in stock abundance. Each tool must be continually evaluated in context of the level of action required, the stock abundance, and the regulatory area. Market factors such as participation levels and willingness to pay for the opportunity to sport fish for halibut will also influence future harvest potential and will need to be taken into consideration when shaping a regulatory strategy.

Determining the best management measure, or combination of measures, to use should be based on the best, most current information available. For this reason, it is preferable to make a list of tools available to managers from which a manager may select one or more of the tools listed. This is the approach used to manage the recreational chinook salmon fishery in southeast Alaska. However, as noted above, final rule making may preclude such flexibility. As such, the measures may need to be periodically evaluated by the Council.

Table 6.18. Estimated percentage of total harvest reduction by month obtained by implementing a 1-fish bag limit in Areas 2C and 3A during 1998 and 1999.

Area	Month	1998	1999
2C	May	2	1
	June	12	10
	July	14	14
	August	10	14
	September	1	1
	Total	39	40
3A	May	5	4
	June	14	13
	July	17	16
	August	7	10
	September	1	2
	Total	44	45

Table 6.19. Estimated harvest reduction by implementing annual limits on anglers fishing from charter vessels

ANNUAL LIMIT	HARVEST REDUCTION (PERCENT)	
	2C	3A*
4	39	25
6	18	15
7	8	10
10	2	6

* The original calculations were done for nonresidents only. The assumption was made that residents fishing from charter vessels in 3A had the same harvest patterns as nonresidents. Therefore, the harvest reductions in 3A were increased by 1/3 to account for reductions in resident harvest also. Since less than 5% of charter clients in 2C are residents, no changes were made to the original harvest reduction estimates.

ESTIMATED PERCENTAGE OF TOTAL HARVEST REDUCTION, BY MONTH, THROUGH IMPLEMENTATION OF A ONE FISH BAG LIMIT IN 2C DURING 1998 AND 1999

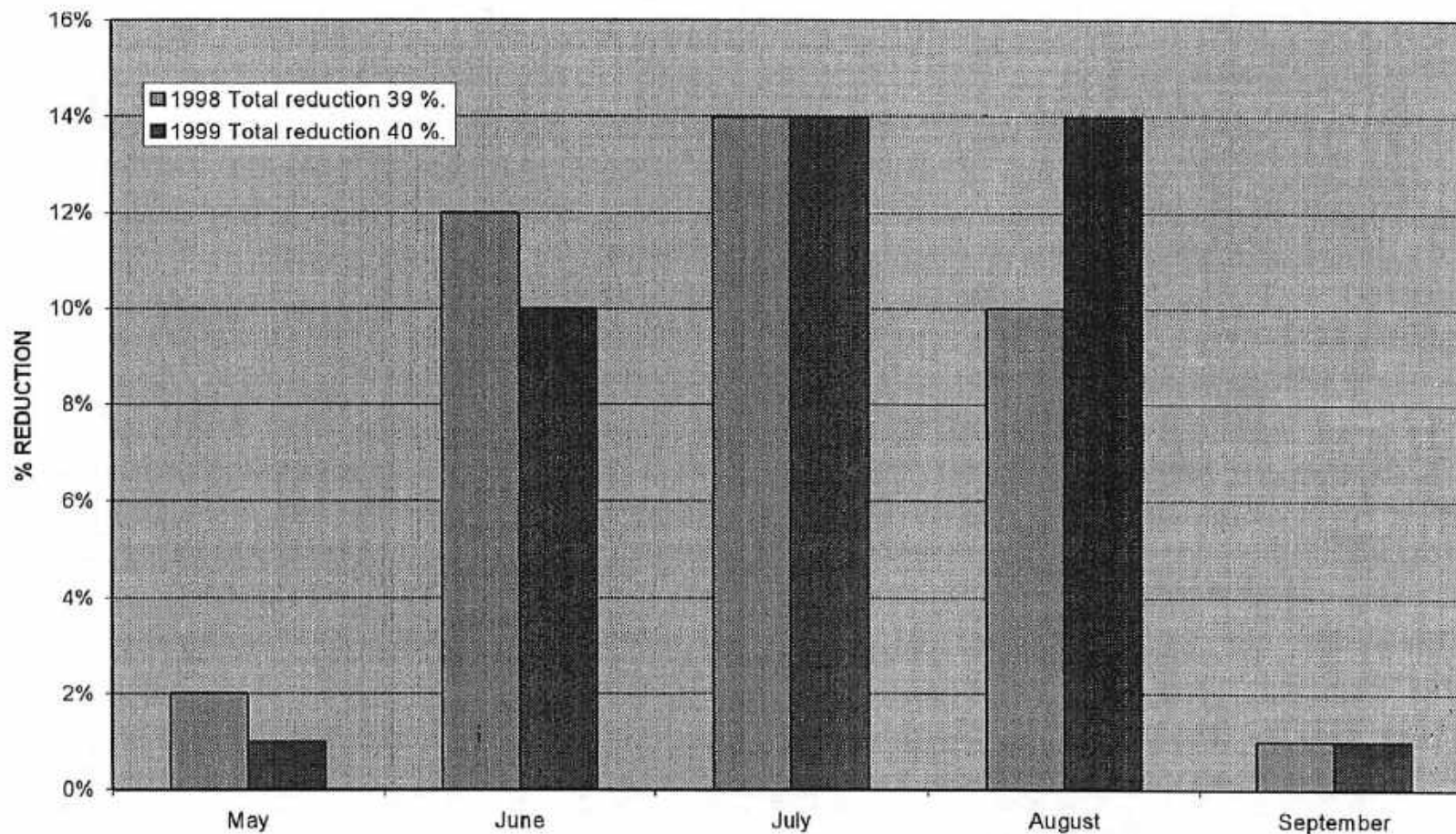


Figure 6.5. Estimated percentage of total harvest reduction, by month, obtained by implementing a 1 fish bag limit in Area 2C, 1998 and 1999.

ESTIMATED PERCENTAGE OF TOTAL HARVEST REDUCTION, BY MONTH, THROUGH IMPLEMENTATION OF A ONE FISH BAG LIMIT IN 3A DURING 1998 AND 1999

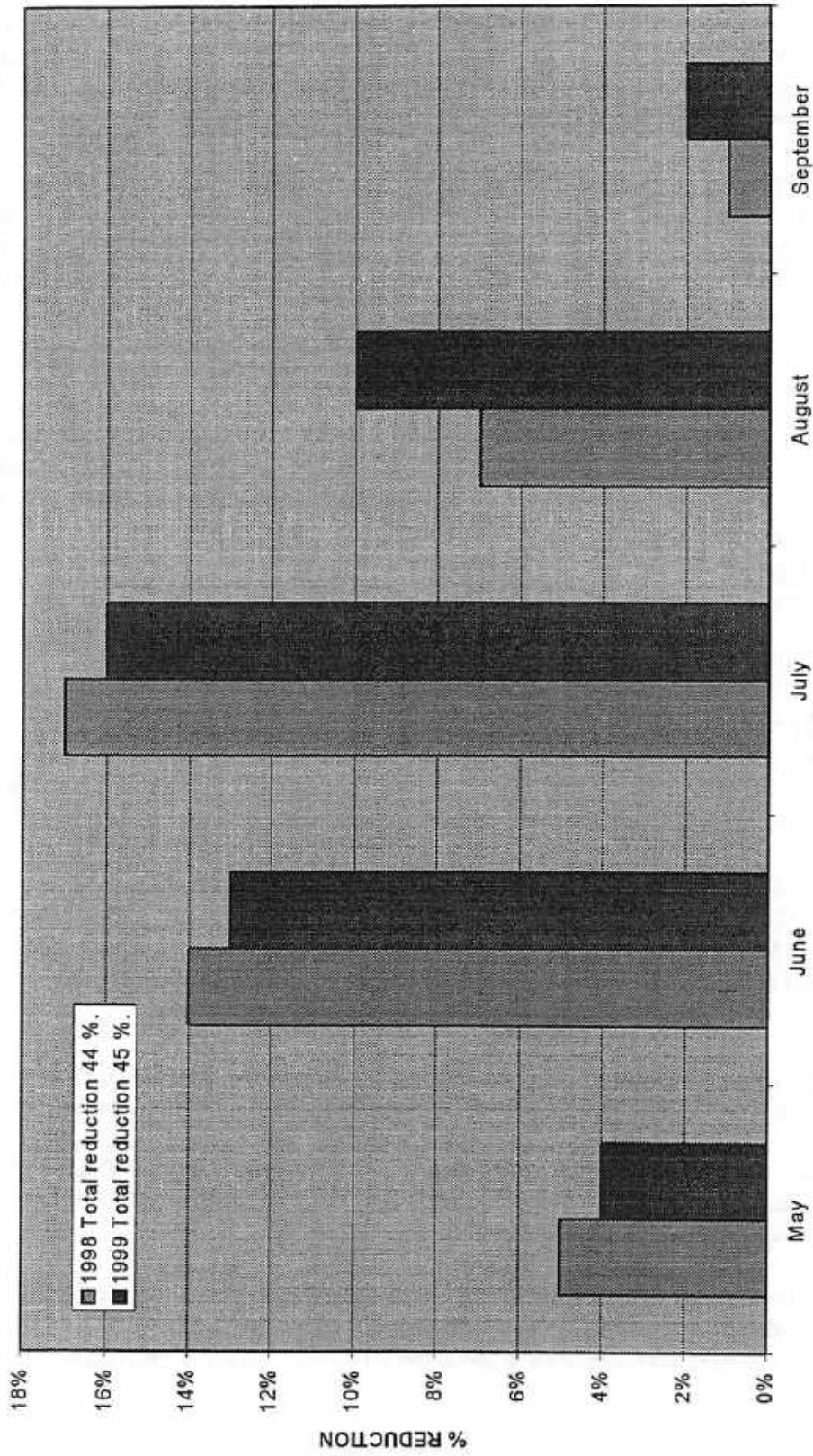


Figure 6.6. Estimated percentage of total harvest reduction, by month, obtained by implementing a 1 fish bag limit in Area 2C, 1998 and 1999.

Framework management matrices depicting how the above management measures could be employed to manage a GHL or other allocation scheme for Areas 2C and 3A are depicted in Figures 6.7 and 6.8, respectively. These matrices are "sample" implementation strategies that show how various measures could be employed to reduce harvest in both areas. They are presented as placeholder frameworks to facilitate discussion, and are not intended as "the" proposed implementation strategy. Different matrices are provided for Areas 2C and 3A to account for differences in fishery performance in the two areas and to remind the public of the Council's ability to select different management measures in each area.

The potential harvest reductions presented in the matrix were calculated based on performance statistics of the halibut charter fishery during 1998 and 1999. Various factors, such as changes in halibut stock abundance, local area plan management, and changes in fleet behavior or clientele to imposed regulations, could affect the realized harvest reduction potential. For example, if halibut stock size was to decrease as speculated by the IPHC, effects of an annual limit or reduced daily bag limit are likely to be less than noted. Also, the management measures in each harvest reduction category may not be independent and therefore may not be additive.

Structure and Stability of the Management Objective for Harvest. A management objective for harvest should be stated in such a manner as to take into account the management precision of the assessment program. Stating the objective in the form of a range can provide for this acknowledgment. In addition, the more stable the management objective for harvest is the more likely the objective will be achieved. An annually shifting allocation has a high probability of requiring annual adjustments that are small enough to be beyond the precision of the management tools and ability to evaluate.

Timing of Implementation

Currently the ADFG provides the IPHC a preliminary estimate of that year's sport harvest in December based on logbook, creel survey, and port sampling information. The IPHC uses this estimate to project the harvest in the sport fishery for the next year. At the end of the next year, ADFG provides a final estimate of the previous year's sport fishery based on the results of the statewide mail survey.

NMFS identified that perhaps as little as six weeks may be needed (dependent upon staff availability) between public notice of charter harvests exceeding the GHL (e.g., December) and public notice to implement triggered management measures for a non-discretionary decision by the NMFS Regional Administrator (mid-February). Such a process would utilize a closed framework action based on an analysis of the proposed action (this EA/RIR/IRFA).

Alternatively, an open frameworked action whereby the RA exercises his discretion in selecting to implement a triggered management measure(s) may be as long as 4 months (e.g., April). In this case more time is needed for notice for public comment and final notice (the 30 day comment may be waved to reduce the time needed to 3 months) (March). A trailing regulatory amendment may be required in the open framework process if sufficient time has rendered the analyses obsolete to the time of his decision or staff must develop the rationale for his decision in choosing from numerous measures.

The Council has intended a desire to minimize disruption to the charter industry. In this case a one year notice may be desirable. In this case, triggering a management measure the following season may meet industry needs. This has the benefit of basing management measures on final estimates of charter harvest.

HARVEST REDUCTION REQUIRED	MANAGEMENT TOOL	ESTIMATED HARVEST REDUCTION POTENTIAL
< 10%	PROHIBIT HARVEST BY SKIPPER AND CREW	3%
10 – 20%	PROHIBIT HARVEST BY SKIPPER AND CREW	3%
	ANNUAL LIMIT OF 6 FISH	18%
	TOTAL	21%
20 – 30%	PROHIBIT HARVEST BY SKIPPER AND CREW	3%
	ANNUAL LIMIT OF 6 FISH	18%
	REDUCE BAG LIMIT TO ONE FISH/DAY IN AUGUST	12%
	TOTAL	33%
30 – 40%	PROHIBIT HARVEST BY SKIPPER AND CREW	3%
	ANNUAL LIMIT OF 4 FISH	39%
	TOTAL	42%
> 40%	PROHIBIT HARVEST BY SKIPPER AND CREW	3%
	ONE FISH/DAY BAG LIMIT FOR ENTIRE SEASON	40%
	TOTAL	43%
<p>Implementation of management tools to achieve harvest reductions from 0 – 20% could take place the season following the overage.</p> <p>Implementation of management tools to achieve harvest reductions above 20% could take place one year following the overage to give charter industry more time to adjust.</p>		
<p>Figure 6.7. Management measure matrix for reducing harvest in Area 2C.</p>		

HARVEST REDUCTION REQUIRED	MANAGEMENT TOOL	ESTIMATED HARVEST REDUCTION POTENTIAL
< 10%	PROHIBIT HARVEST BY SKIPPER AND CREW	8%
10 – 20%	PROHIBIT HARVEST BY SKIPPER AND CREW	8%
	ANNUAL LIMIT OF 7 FISH	10%
	TOTAL	18%
20 – 30%	PROHIBIT HARVEST BY SKIPPER AND CREW	8%
	ANNUAL LIMIT OF 4 FISH	25%
	TOTAL	33%
30 – 40%	PROHIBIT HARVEST BY SKIPPER AND CREW	8%
	ANNUAL LIMIT OF 4 FISH	25%
	REDUCE BAG LIMIT TO ONE FISH/DAY IN AUGUST	8%
	TOTAL	41%
> 40%	PROHIBIT HARVEST BY SKIPPER AND CREW	8%
	ONE FISH/DAY BAG LIMIT FOR ENTIRE SEASON	45%
	TOTAL	53%

Implementation of management tools to achieve harvest reductions from 0 – 20% could take place the season following the overage.

Implementation of management tools to achieve harvest reductions above 20% could take place one year following the overage to give charter industry more time to adjust.

Figure 6.8. Management measure matrix for reducing harvest in Area 3A.

Enforcement

Enforcement issues: Enforcement is a key component of any fishery harvest management scheme. The NMFS, USCG, ADPS, and ADFG all report that they do not have enforcement programs specifically directed at the recreational charter fishery. Instead, enforcement occurs on an opportunistic basis. All agencies agreed that some level of additional enforcement would be needed under a GHL system, depending upon the allocation and implementation scheme adopted. Also, the decision to allocate additional enforcement to this program would properly entail an evaluation of the public interest in doing so, versus the trade offs in doing less enforcement somewhere else.

Staff discussed GHL enforcement issues, especially the implications of activating the various measures like line, bag, and trip limits. Although a state enforcement officer was not present, the other agencies essentially reported that additional enforcement resources would not be forthcoming to support this program.

Having said that, there are characteristics of the recreational charter fishery that suggest a different and lesser level of enforcement may be needed to ensure an adequate level of compliance with the program. Several characteristics of the fishery differentiate it from other fisheries and work to the advantage of regulators:

- a. The recreational charter boat fishery operates in the public eye. Requiring operators to prominently post GHL control measures like bag limits and line limits onboard charter boats would help to promote compliance. The state could further support this by requiring those businesses selling sport-fishing licenses to do the same.
- b. The recreational charterboat fishery is highly competitive. And while there are some operations in isolated locations, many boats tie up and operate in close proximity to other charter boats. It is reasonable to expect that those operators who are following the rules would be quick to notice another operator seeking to "steal" customers by offering a better trip with higher bag or rod limits.
- c. Charterboat operators are required to have a current Coast Guard license to operate. One of the conditions of the license requires the operator to comply with *all* federal regulations. Charter boat operators potentially risk losing their Coast Guard license if they violate federal fisheries regulations. It is reasonable to conclude that because of the nature of the Coast Guard license, inferring a trust and responsibility to the licensee, as well as the double jeopardy implications, charter boat operators would likely have a higher rate of compliance with GHL measures than might otherwise be expected.

These three factors, along with the current system of opportunistic enforcement may provide a level of compliance sufficient to ensure the GHL measures have the desired effect in controlling the fishery.

The Coast Guard has taken the position that where the above does not hold true, if there is sufficient public interest and concern in the conduct of the recreational charter fishery, it could respond by shifting effort from other areas to focus on the charter fleet. A highly publicized focus operation, of short duration, may have sufficient impact to raise compliance back up to an acceptable level, while only requiring a modest shift of enforcement effort. These operations could be done periodically through the region and season, under an overall strategy of raising compliance to an acceptable level. This approach is different from one that attempts to identify the law enforcement resources necessary to check all fishery participants or apprehend all violators.

Summary

In summary, staff discussed the importance of implementation and enforcement of whatever the Council chooses as its preferred action. Staff identified the lack of an appropriate and effective management measure to implement once an area GHL is reached. As a solution, ADF&G staff identified a pre-season temporal adjustment to the bag limit as a new management measure for Council consideration. A question arose as to whether the Council could take action on such measures that are not explicitly included in the public review analysis in February, although the appropriate data was included in the analysis. Since: (1) this proposal is being circulated prior to the February Council meeting and will be presented and discussed during the staff presentation of this agenda item; and (2) the public will have the opportunity to comment on the proposal and all other aspects of the GHL analysis during : (a) final action in February; and (b) during the public comment period associated with publication of the proposed rule once the regulatory amendment package is submitted to the Secretary, it is the staff recommendation that the Council may consider this new measure during final action at February meeting.

become constraining on harvest. Only when latent capacity is filled would a moratorium become effective at maintaining harvest within the GHL.

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

Administration

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

SUMMARY OF SECTION 7

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

MEMORANDUM

TO: Council, SSC, and AP Members

FROM: Clarence G. Pautzke *CO*
Executive Director *Sec*

ESTIMATED TIME
20 HOURS

DATE: February 2, 2000

SUBJECT: Halibut Charterboat Management

ACTION REQUIRED

Final action on halibut charterboat GHL and management measures.
Discussion of an Individual Fishing Quota Program for the halibut charter fleet.

BACKGROUND

Final action

In December 1999, the Council approved for public review the analysis for implementing a guideline harvest level (GHL) and management measures to keep harvests under the GHL for the halibut charter fishery in Gulf of Alaska Areas 2C and 3A. It adopted the restructured alternatives as proposed by the staff to simplify the decision-making process and added to the analysis: (1) possession limits as a possible management tool; (2) a 3-year rolling average for determining whether an area GHL is exceeded; (3) an option to apply the GHL as a percentage to the constant exploitation yield (CEY) by area after non-guided sport and personal use deductions are made, but prior to deductions for commercial bycatch and wastage; (4) additional discussion of available baseline economic data for Area 2C; (5) clarification of the participation rate model's application to the bag limit analysis; (6) a suboption to reduce the GHL range of fish by an amount proportionate to a reduction in the CEY; and (7) additional discussion of implementation and enforcement issues.

The public review draft of the GHL analysis, which included revisions addressing # 1 - 5 (above), was distributed on January 14, 2000. The current list of alternatives scheduled for final action (Agenda C-1(a)) and the executive summary (Agenda C-1(b)) are attached. An addendum, which addressed # 6 - 7 and the results of the IPHC halibut stock assessment, was distributed on February 1 and is also attached under Agenda C-1(c). It includes a new proposal for preseason temporal bag limit changes and a framework for an implementation schedule. A 1995 NOAA General Counsel memo clarifying that State authority to regulate fishing for Pacific halibut in Convention waters is preempted by federal law is under Agenda C-1(d). Comments by the IPHC are attached under Agenda C-1(e). Public comments received are bound separately and identified as Agenda C-1 Supplemental.

IFQs

The Council requested that a discussion be scheduled at this meeting of changes to the halibut individual fishing quota program which would allow the purchase of IFQs by the charter fleet. Some individuals in the charter industry have also proposed the development of an IFQ program based on charter harvests in lieu of the GHL. Such a program would be based, for example, on fishing history as reported on the State logbooks for the period 1998-1999 (as an initial allocation) and then allow transfers of quota shares across sectors. There is some question as to whether this would be considered a "new" IFQ program or simply a change to the existing program. In any case, the current Congressional moratorium does not preclude the Council from discussion and development at this time. A more detailed proposal for such a program is included in your notebooks under Agenda C-1(f).

Halibut GHL Alternatives for final action in February 2000

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

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

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

Option 1: Fixed percentage annually expressed in pounds.

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

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

Option 2: Fixed range in numbers of fish.

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

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

Option 3: Manage GHL as a 3-year rolling average

Option 4: Apply the GHL as a percentage to the CEY by area after non-guided sport and personal use deductions are made, but prior to deductions for commercial bycatch and wastage.

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

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

ISSUE 3: Under varying halibut abundance.

Option 1: Status quo. The GHL fixed percentage varies on an annual basis with area halibut abundance.

Option 2: Reduce area-specific GHL ranges during years of significant stock decline. The following suboptions may be instituted in a stepwise fashion, and/or used in combination.

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

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

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

or an amount proportionate to the reduction in abundance (indicated by the CEY)

ISSUE 4: GHL or allocation

- Option 1: Under a GHL and the current IPHC setline quota formula, halibut not harvested by the charter fleet in one year are rolled into the commercial setline quota the following year.
- Option 2: Unharvested halibut would remain unharvested under a direct allocation to the charter sector.
Suboption: unharvested halibut banked in a sportfish reserve

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

- Option 1: Establish an area-wide moratorium
- Option 2: Establish a local moratorium
Suboption: Prohibit new charter licenses upon attainment of the GHL.

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

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

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

<u>Area 2C Options</u>	<u>Area 3A Options</u>
4 million lb	10 million lb
6 million lb	15 million lb
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Option 1: Under a GHL and the current IPHC setline quota formula, halibut not harvested by the charter fleet in one year are rolled into the commercial setline quota the following year.

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

Suboption: unharvested halibut banked in a sportfish reserve

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

Option 1: Establish an area-wide moratorium

Option 2: Establish a local moratorium

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

The criteria for an area-wide halibut charter moratorium are:

Years of participation

Option 1: 1995, 1996, and 1997 IPHC and CFEC licenses and 1998 logbook

Option 2: 2 of 3 years (1995-97) plus 1998 logbook

Option 3: 1 of 3 (1995-97), plus 1998 logbook

Option 4: license or logbook in any one year (1995-98)

Owner vs Vessel

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

Option 2: vessel

Evidence of participation

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

Vessel upgrade

Option 1: license designation limited to 6-pack, if currently a 6-pack, and inspected vessel owner limited to current inspected certification (held at number of people, not vessel size)

Option 2: allow upgrades in southeast Alaska (certified license can be transferred to similar sized vessel)

Transfers will be allowed

Duration for review

Option 1: tied to the duration of the GHF

Option 2: 3 years

Option 3: 5 years (3 years, with option to renew for 2 years)

SUMMARY OF SECTION 2

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

EXECUTIVE SUMMARY**SUMMARY OF SECTION 1**

This analysis for a regulatory amendment assesses the potential economic and social impacts of implementing management measures to limit harvests by anglers in the halibut charter fisheries in International Pacific Halibut Commission (IPHC) Areas 2C (Southeast Alaska) and 3A (Southcentral Alaska). Currently there is no limit on the annual harvest of halibut by anglers utilizing charter boats, lodges, and outfitters. Therefore, the status quo results in an open-ended reallocation from the commercial fishery to a growing recreational charter fishery.

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

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

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

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

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

In April 1999, the Council identified for analysis: (1) a suite of GHL management measure alternatives; (2) alternatives that would change the GHL as approved in 1997; and (3) area-wide and LAMP moratorium

options under all alternatives. Recognizing that (1) reliable in-season catch monitoring is not available for the halibut charter fishery; (2) in-season adjustments cannot be made to the commercial longline individual fishing quotas (IFQs); and (3) the Council's stated intent to not shorten the current charter fishing season resulted in the Council designing the implementing management measures to be triggered in subsequent fishing years.

During initial review in December 1999, the Council added: (1) a change in possession limits to the management measures that it would consider to limit charter halibut harvests under the GHL; (2) an option to apply the GHL as a percentage to the CEY by area after non-guided sport and personal use deductions are made, but prior to deductions for commercial bycatch and wastage; (3) an option to manage GHL as a 3-year rolling average. Lastly, the Council deleted an option that would close the charter fishery in-season if the GHL was reached or exceeded. The Council further adopted the restructured alternatives as proposed by staff. The options are not mutually exclusive and may be combined when the Council makes its final decision in February 2000.

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

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

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

Option 1: Fixed percentage annually expressed in pounds.

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

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

Option 2: Fixed range in numbers of fish.

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

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

Option 3: A 3-year rolling average

Option 4: A percentage to the CEY by area after non-guided sport and personal use deductions are made, but prior to deductions for commercial bycatch and wastage.

Under any option, management measures would be triggered 1-2 years after attainment of the GHL, but prior to the start of the charter fishery season for industry stability.

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

ISSUE 3: Under varying halibut abundance.

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

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

SUMMARY OF SECTION 3

The two main criteria that determine if and when the GHLs, as presented in this analysis, will be reached or exceeded are: 1) the status of the halibut biomass and future biomass projections and 2) charter effort and projected growth of harvest. Section 3 provides the baseline data from the 1998 IPHC halibut stock assessment and descriptions of halibut harvests and participation by fishery sector and area from ADF&G statewide harvest surveys that are used in Sections 5 and 6 to prepare the RIR. Lastly, halibut biomass and charter fishery projections as presented to the Council in 1993 and 1997, and as currently updated in 1999, are discussed. **A separate report on the findings of the 1999 IPHC halibut stock assessment and 2000 halibut quotas will be provided prior to final action in February 2000 and will be incorporated into the final analysis prior to submission for Secretarial review.** This report will also include revised biomass projections which will likely modify the current projections of when the GHLs may be reached.

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

The halibut resource is healthy and total removals are at record levels. The 1998 IPHC stock assessment models show a strong 1987 year-class. No strong year-classes are following, indicating that recruitment and ultimately, biomass, have peaked. Changes for Areas 2C and 3A over the past several years occurred as a result of changes to the stock assessment model more than as a result of biological changes. In the absence of model changes, short-term fluctuations in exploitable biomass, and therefore in quotas, should be small. The final analysis will be revised pending the results of the 1999 IPHC stock assessment.

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

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

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

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

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

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

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

Current charter harvest levels and projected growth

The expected pattern for the halibut charter fishery is continued growth in the number of halibut taken, but little change in average weight. Little change occurred in charter halibut harvest (in pounds) from Area 2C during 1994-96 (an average of 970,000 lb net weight). A 12% drop to 853,000 lb occurred in 1997, followed by a near doubling of harvested biomass (1.77 million lb) in 1998. The 1998 logbook data confirmed this estimate. Two significant changes occurred in the Area 2C halibut charter fishery between 1997 and 1998: 1) the number of halibut harvested increased by 45%; and 2) the average weight of halibut increased by 43%. Less change occurred in the Area 3A halibut charter fishery between 1998 and 1999 than occurred in Area 2C: 1) the number of halibut harvested was approximately the same despite a decrease of 20% in client angler-days; and 2) the average weight of halibut decreased by only 6%.

Current charter participation and projected growth

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

A cursory comparison of businesses and vessels actively participating in the halibut charter industry would indicate that growth is flat, despite only two years of logbook data and the newness of the mandatory logbook requirement. A more detailed examination of active vessels in Section 5, however, identifies approximately 350 of the 1999 vessels as unique to that year (175 in each area). This indicates considerable exit and entry in this fishery between 1998 and 1999.

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

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

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

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

The actual growth rate for the halibut charter and non-charter fishery from 1990-95 was similar to the 6.4% growth rate reported in the 1997 Council analysis. From 1990-95, the combined sport fishery in Area 2C had a growth rate of 7.1%. This analysis updates this information; the average annual growth rate based on SWHS for Area 2C for 1994-98 was actually 10.8%, with wide variance between years. Halibut harvest increased 45% between 1997 and 1998. The 1998 logbook verified this estimate, but the logbook program did not exist in 1997 to verify the 1997 SWHS estimate. It is believed the SWHS may have underestimated charter catch and harvest in earlier years.

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

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

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

Baseline economic data for charter fishery

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

Angler expenditures

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

Average angler expenditures for Cook Inlet marine sport fisheries

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

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

Applications to 3A

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

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

Applications to 2C

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

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

Commercial fisheries

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

Current commercial harvest levels and projected growth

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

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

Current commercial participation

A total of 1,734 persons held quota share (QS) in Area 2C at the end of 1998, down 27% from initial issuance in 1995 (2,386 persons). More than half of Area 2C QS holders hold QS in amounts \leq 3,000 (1998) pounds. The number of shareholders decline with increasing size of QS: 28%, 15%, and 4% hold QS between 3-10 thousand lb, 10-25 thousand lb, and > 25 thousand lb, respectively. The majority of consolidation has occurred in persons holding less than 3,000 pounds of quota. Some consolidation of QS was expected when the IFQ

program was approved. However, the Council did implement measures to ensure that small participants remained in the fishery. Those measures appear to have been successful.

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

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

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

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

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

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

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

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

Background Economic Information on the Commercial Halibut Fishery

Ex-vessel prices for halibut in the commercial fishery increased statewide from 1992-96. The statewide average price of halibut in 1992 was \$0.98 and increased to \$2.24 in 1996. In 1997 the price dropped slightly

to \$2.15, then fell sharply to \$1.26 in 1998. The large decrease in price for the 1998 fishing year reflected an overall decrease in fish prices that year were at least partially a result of weak Asian economies.

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

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

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

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

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

SUMMARY OF SECTION 4

Data limitations and time constraints prohibit the development of a full complement of quantitative models to estimate net benefit and impact assessments of the halibut charter and commercial fisheries. Section 4 assimilates data and results collected from a number of ongoing studies that shed some light on the current economic characteristics of the commercial and sport charter halibut fisheries. Findings relating to the charter fishery are limited in geographic scope to the Cook Inlet portion of the Kenai Peninsula. This information may sufficiently characterize the Area 3A fishery; however, it is not appropriate to extrapolate these findings to 2C. While the information provides only a fragmented description of the economics of the halibut charter and commercial industries, it helps point out the directional implications of benefits and impacts affected by a GHL and/or moratorium.

Demand for commercially caught halibut

Herrmann (1999) reviewed the available literature on demand studies for commercially caught halibut. Applying these results to describe present day conditions is problematic not only because the data relied upon

is dated, but also because of recent structural changes in the fishery, effects of which are difficult to isolate. These include adoption of a quota style management regime and drastic increases in the TAC.

To explain and describe current halibut demand at the exvessel level, Herrmann begins with a simple model for expository purposes and later updates and adapts a demand model from Lin et al. (1988) to generate more reasonable measures of elasticity, and the inverse of price elasticity: flexibility. Price flexibility, that is the relative change in price resulting by a change in quantity, is useful for predicting how quantity changes affect total revenues to harvesters. Herrmann found commercial demand at the exvessel level to be relatively inflexible, meaning that an increase in harvests would be met, all else the same, with a less than proportional decrease in price. This implies that the halibut market is not yet saturated at the exvessel level. However, without better information on operator costs, we cannot conclude that increased total revenues due to increased harvests will translate into a net revenue gain.

Estimating demand at the consumer level is theoretically possible given the exvessel demand and sufficient information on marketing margins and the price and quantities of the various product forms at the retail level. However, the scarcity of such data precludes accurate estimation of retail level demand.

Stated preference (contingent valuation) model for marine sport fishing off of the Kenai Peninsula

The value of a sport caught halibut off of the Kenai Peninsula is the topic of a forthcoming work that relies on data elicited by survey in Lee et al. (1999a). Results of two methodologies will be compared to provide a range for the value of sport caught halibut. These results will not likely be available until early 2000.

Participation rate model for recreational halibut fishing off of the Kenai Peninsula

A working paper by Lee et al. (1999b) provides a model that predicts how angler participation changes in response to changes in fishing attributes, such as the cost of the average trip and/or the expected catch and size of halibut and salmon. The results of simulations where price (cost) and catch were varied is presented, as well as elasticity estimates derived from these simulations. Overall, anglers are predicted to respond inelastically to changes in per day fishing costs. For all prices, Alaskans respond more sensitively to price changes than do non-residents. Likewise, changes in halibut catch effect a relatively inelastic response in participation.

Angler net benefits

The participation rate model can also be used to estimate the average net benefit to anglers of fishing for halibut, although we can't isolate charter related benefits from all other halibut opportunities. The average Alaskan angler in the Cook Inlet halibut fishery off the Kenai Peninsula realizes \$61 worth of benefits above and beyond their daily costs, whereas non-residents gain \$59 of net benefits on average. These figures are used to arrive at an aggregate measure of net benefits for charter boat clients in the Cook Inlet portion of the Kenai Peninsula fishery given estimates of resident and non-resident effort. In 1998, the combined net benefits are estimated at \$3,603,929. Given annual angler expenditures of \$19,320,943, the total value of this fishery is estimated at \$22,924,872. In order to derive net benefits from the fishery, we would have to subtract the costs associated with providing charter trips. Marginal cost data is not currently available, making it difficult to estimate the net benefits to charter operators.

Quota share prices as proxy for expected net benefits to commercial fishing sector

Though adequate cost data for the commercial sector is not available, a measure of the capitalized net benefits expected by commercial operators can be gleaned from the market price of halibut quota shares. However, even though the price of quota shares can be related to the present value of expected producer surplus, it does not necessarily reflect the accrual of that surplus to quota share holders because only some of these were awarded quota (and hence received a windfall) whereas others purchased it. Therefore, this complicates estimation of total producer surplus.

Expenditure based economic impacts of the Cook Inlet halibut charter fishery to the western Kenai Peninsula

Based on expenditure data collected in the Lee et al. (1999a) survey, input-output (I/O) modeling was performed to gauge the impacts of angler expenditures attributable to the halibut charter fishery on the western Kenai Peninsula. After accounting for the direct, indirect, and induced effects of angler expenditures, the fishery contributes a total of \$22,560,637 worth of sales (output), \$9,259,417 worth of income, and 738 jobs to the regional economy (western Kenai). Note that these jobs are not full-time equivalents, but include seasonal and part-time positions. The economic impacts of incremental changes to halibut catch and the average daily cost of taking a trip are also provided in tabular form.

SUMMARY OF SECTION 5

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

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

The alternatives under consideration would qualify between 497 and 694 vessels, if 1998 logbook participation is required. These numbers are substantially less than the numbers actually participating in 1998 and 1999, based on the logbook information. Option 4 only requires participation in any year 1995-1998 and would qualify 2,073 vessels. Allowing supplementary information for qualification (other than IPHC license and/or 1998 logbook) could increase the number of qualifying participants.

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

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

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

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

A moratorium would likely help promote economic stability for existing charter operators, particularly in areas where dramatic increases in participation have occurred recently. However, the issue of who receives the permit will also play an important role in determining future stability. Some of the benefits derived by charter operators from a moratorium would come at the expense of losses to the charter clients in terms of potential price increases for charter trips, which would result in reduced net angler benefits.

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

There is still uncertainty in the accuracy of the logbook reports. The State has recommended a minimum 3-year time series of logbook data to compare with data collected in the statewide harvest and creel surveys.

SUMMARY OF SECTION 6

Alternative 1, no action, would result in continued unconstrained charter halibut harvests and a *de facto* reallocation of halibut from the commercial sector to the charter sector. This analysis assumes that sport halibut removals will increase by approximately 9% in Area 2C and 4% in Area 3A for the charter sector and 1 percent in the unguided sector over the next 5 years. If that rate of growth does occur in future years, the ex-vessel gross revenues to the commercial fishery in areas 2C and 3A would decline given an elastic demand curve at the ex-vessel level. Net benefits to consumers of commercially caught halibut would also decline. There is not enough information to discern whether these losses would be offset by the increases in net benefits to charter operators and guided anglers. Nor is there enough information to compare the loss of regional economic activity associated with the commercial sector against the respective gain for the charterboat sector.

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

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

- halibut biomasses are at peak abundances, but likely to decline by 3-5% each year in the short-term;
- quotas are likely to remain steady according to the 1998 IPHC stock assessment;
- charter harvests are continuing to increase, but at declining rates;
- commercial quotas decline as charter harvests increase.

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

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

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

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

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

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

The Council also added two options for applying the GHL that may be chosen in combination with either Options 1 or 2 and each other.

Option 3: Manage GHL as a 3-year rolling average

The Council's new option to manage the GHL on a 3-year rolling average may result in delaying the imposition of management measures by up to 3 years to generate the average. The Council may instead choose to manage an annual average in the event the GHL is greatly exceeded.

- Option 4: Apply the GHL as a percentage to the CEY by area after non-guided sport and personal use deductions are made, but prior to deductions for commercial bycatch and wastage.

An addendum will be provided prior to final action which will address the impacts of 2000 quotas, revised biomass projections, and changes to the IPHC procedure for calculating charter/commercial quotas.

Under any option, management measures would be triggered 1-2 years after attainment of the GHL, but prior to the start of the charter fishery season for industry stability.

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

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

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

- the reduction in harvest effected by a bag limit could exceed the actual decrease in halibut that can be kept assuming that effort does not change. This is because effort can be expected to change as anglers react to the change in quality of the average halibut trip. The magnitude of effort change is difficult to quantify and is likely to vary across region according clientele usage patterns.
- boat limits would result in the same amount of halibut being harvested on a trip as the bag limit alternatives, and, in fact, may result in higher harvests under the proposed "collective" or party fishing definition.
- line limits may redirect fishing effort between vessels, but is unlikely to further restrict harvest. A 6-line limit and restrictions of lines to number of paying passengers currently exists in Area 2CA; additional restrictions would limit vessels to a 4-packs or 5-packs. Nearly 90% of Area 2C charters took four clients in 1998, therefore, a 4-line limit may not result in adequate reductions to stay within the GHL. Area 3A charter vessels traditionally fish up to 27 lines. A floating scale for line limits may address traditional fishing patterns on larger sized vessels. A prohibition of fish harvested by crew may result in adequate harvest reduction to keep the harvest within the respective GHLs. Enforcement of lines "fished" would also be difficult.

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- most charter clients take either two or four halibut in a year. A small percentage of avid anglers exceed that, indicating that annual angler limits will have less impact on total halibut removals compared with impacts on the amount of halibut taken by a few fishermen.
- only 4% of Areas 2C and 3A trips would be affected by limiting a vessel to one trip each day. If an average trip results in an average harvest, then a vessel trip limit may result in a harvest reduction of 4%. Recognizing the overcapacity of the fleet, clients will likely charter on another available vessel.
- superexclusive registration and Sport Catcher Vessel Only Areas may redistribute fishing effort but are unlikely to reduce halibut removals. They may be valid management tools to be included within a LAMP.
- a rod permit program does not exist in Washington or Oregon upon which to model the Alaska halibut fishery.
- The sportfish reserve would nullify the constraining effect of the GHL by reallocating halibut from the commercial sector to the charter sector when the GHL would trigger a reduction.
- possession limits will not be an effective management tool since most fishermen harvest only one or two halibut per year; however, proposed changes would enhance federal enforcement of current possession limits.
- prohibiting halibut harvested by the captain and crew may limit the charter harvest to below the GHL; however, enforcement may be difficult on multi-species charters since it would be in effect for halibut only.

Relative effectiveness of proposed management measures

Proposed measures	no	+	++	+++
line limits				
boat limit				
annual angler limit				
vessel trip limit			--	
bag limits				
super-exclusive registration				
sport catcher vessel only area				
sportfish reserve				
rod permit				
possession limits				
prohibit crew-caught fish				

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

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

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

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

ISSUE 4: Determine whether a GHL or allocation

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

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

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

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

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

- The alternatives would qualify between 497 and 694 vessels, if 1998 logbook participation is required. These numbers are substantially less than the numbers actually participating in 1998 and 1999, based on the logbook information. Option 4 only requires participation in any year 1995-1998 and would qualify 2,073 vessels. Allowing supplementary information for qualification (other than IPHC license and/or 1998 logbook) could increase the number of qualifying participants.
- Although the total harvest capacity of the fleet is difficult to estimate, the currently licensed fleet (based on 1998 logbooks) has a harvest capacity well above the current harvest level, and even the currently active fleet is probably not operating at its maximum capacity. The presence of excess harvest capacity reduces the effectiveness of a moratorium and the ability to predict when it may

reliable information on economic value and behavioral change, contingent (hypothetical) survey results of all kinds are subject to a wide range of biases that can influence validity, accuracy, and reliability (Arrow et al. 1993). Although hypothetical surveys can provide information regarding the demand and willingness-to-pay for public and private goods, the NOAA Blue Ribbon Panel on Contingent Valuation indicates that "bias(es) must be expected to occur in CV studies." (Arrow et al. 1993, p. 4610). Accordingly, the panel suggests that such models, even when applied appropriately, be used as a "starting point," not as an automatic indicator of changes in economic values. Moreover, a significant body of literature has demonstrated that CVM approaches tend to overestimate willingness to pay (WTP) for improvements in resource quality or quantity (e.g., an increase in the bag limit) (Arrow et al. 1994). For example, Spencer et al. (1998) estimate that hypothetical WTP for water quality monitoring is approximately four times greater than real WTP (estimated using real money experiments).

Layman, Boyce, and Criddle (1996) argue that methodologies such as the hypothetical travel cost method avoid some of the biases associated with other contingent valuation formats. However, it must be recognized that participation rate changes predicted by Lee et al.'s (1999) model are based on a hypothetical survey methodology, and thus should be interpreted with caution (Cummings et al. 1996). This issue, of course, is minor compared to the fact that the draft report misuses Lee et al.'s (1999) model, as described above.

Appropriate Estimation of Baseline Expenditure Estimates (Section 3)

This section provides the baseline biological and economic information on halibut and describes halibut harvests and participation in the charter and commercial fisheries through 1998. This section provides a massive quantity of data, and in general could benefit from selective editing to make the section more "user friendly." Moreover, some of the sections should be deleted altogether. Specific comments are as follows:

Pages 69-74, total angler expenditures in the Cook Inlet marine sport fishery for salmon and halibut assuming that 100% of trip is attributable to fishing: This section should be removed, as there is another section that makes more realistic assumptions about these expenditures. The report states that the assumption underlying this section (that 100% of angler expenditures are related to charter fishing) is likely unrealistic. As a result, they provide a model later in Section 3 that makes more reasonable assumptions regarding expenditures. Why illustrate an inferior model when a better one is included in the same report? Also, note that all numbers include both salmon and halibut anglers, so expenditure data is averaged over these two groups.

Page 69 (paragraph 1): Authors note a later model that applies average expenditure data (calculated for halibut only trips) to approximate expenditures on halibut only trips. Why not simply use this model? Why provide three different models to estimate the same thing?

Note on calculations of expenditures by Alaska residents: The report estimates a specific percentage (depending on the model) of expenditures by Alaska residents that would occur as a result of charter fishing trips. However, the critical question is whether those expenditures would occur in other Alaska markets if the charter fishery did not exist—this is the appropriate measure of economic impact used in the travel and tourism literature (McHone and Rungeling 2000). This is a critical idea when one measures the impact of specific "events" (such as fishing) on expenditures. The report assumes that (for example) "89.1% of the Kenai living and transportation expenditures can be attributed to the fishing component of the trip, as can 79.3%

of the living and transportation expenditure in Alaska." (p. 79). These numbers are based on the percentage of expenditures that would not occur (in fishing communities) if residents cancelled the predicted number of fishing trips. The report assumes that these expenditures then simply disappear. However, it is just as possible that these residents would spend those same dollars in other recreational pursuits in Alaska. Accordingly, the total expenditures *resulting from the presence of the charter fishery* are likely much less than the total expenditures related to the fishing component of resident trips. There is a recent paper in the *Journal of Travel Research* (McHone and Rungeling, JTR 38(3), Feb. 2000) that covers such topics in greater detail. They are also covered in a white paper by Tyrrell and Johnston (2000).

In general, the expenditure estimates are based on a relatively crude framework, and fail to account for many of the complexities associated with accurate calculation of expenditures related to particular events or industries. The key issue in calculating total expenditures is: If the charter fishery were to disappear, how much would total expenditures change? The report estimates do not answer this question. Rather, they indicate the total *charter fishery related* expenditures that would disappear, not accounting for the fact that these would be at least partially offset by gains in other industries in Alaska (and elsewhere).

The economic intuition underlying correct expenditure calculations can be complex; as a result such mistakes are common when expenditures are estimated in an over-simplified model. However, the frequency of such errors does not justify their presence—particularly in documents designed as tools for policy-making.

Conclusion

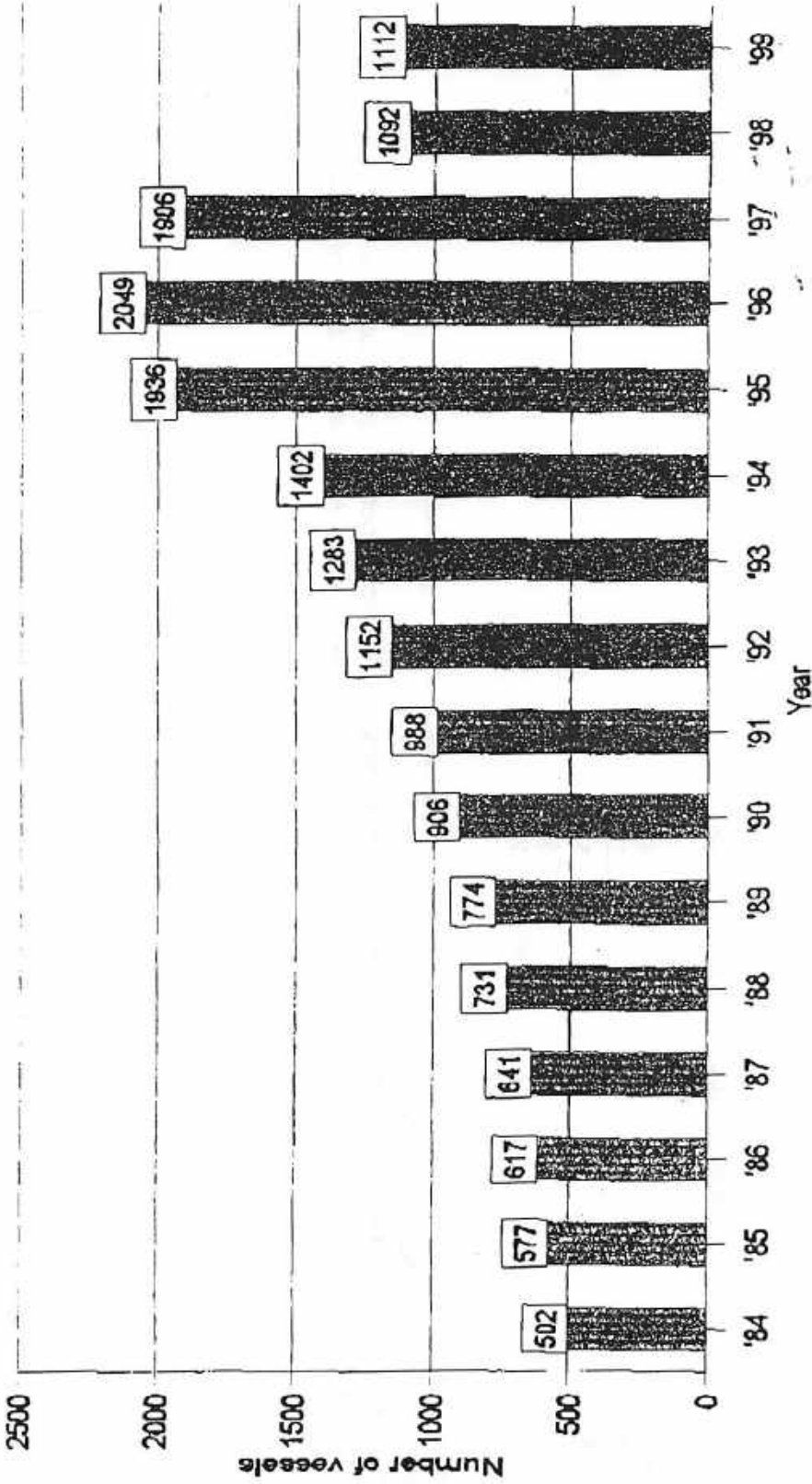
In many instances, the NPFMC Draft Report (EA/RIR/IRFA) provides acceptable analysis given the limited data available. Moreover, the report in most cases indicates those instances in which appropriate analysis is not possible due to data limitations. It also details the caveats associated with the various analyses and results presented. In most cases, the report makes good use of available data. However, there is still room for improvement in the report. In some cases, these improvements represent simple wording or other changes to add to the clarity of the document. However, there are other instances in which the report includes misleading information, or fails to provide important information. The first primary limitation of the document is that it fails to specify clearly the implications of the first policy decision: whether to implement a GHL. This decision will have important economic implications for both sectors of the fishery. The commercial sector will be impacted in terms of future harvests, producer surplus, and the value of their quota share assets. The economic implications for the charter sector will depend on the specific management tools applied.

The second critical limitation of the report is that it provides misleading estimates of the impact of one of the (potentially) more effective management tools to implement the GHL—bag limits. The analysis of bag limits found in Section 6.2.2.2.1 does not provide satisfactory or appropriate analysis. The results of this section are based, for the most part, on the misuse of a model designed for other purposes. Although the literature concerning bag limits is limited, assessment of appropriate models of participation given bag limit changes suggests that the draft estimates overestimate (by a wide margin) actual impacts that might be expected. Given this, the inappropriate use and interpretation of Lee et al.'s (1999) participation rate model should be purged from the report.

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Halibut Charter Vessel Registrations in Alaska



Data from 1984-1996 from IPHC registrations of sport only and sport/commercial registrations
Data from 1997 is from ADFG registration
Data from 1998-1999 from ADFG logbook program (bottomfish only plus salmon & bottomfish combination trips, combination trips may not include halibut since rockfish caught while salmon fishing is listed as bottomfishing); 1999 data preliminary

Table 1. Charter Vessel Registrations and Activity Levels in Alaska

	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995
Registrations/Logbooks	502	577	617	641	731	774	906	988	1152	1283	1402	1936
1-5 charters												
6-25 charters												
26-50 charters												
51-100 charters												
>100 charters												
	1996	1997	1998	1999								
Registrations/Logbooks	2049	1906	1092	1112								
1-5 charters			75	95								
6-25 charters			227	221								
26-50 charters			227	243								
51-100 charters			325	343								
>100 charters			238	210								

Data from 1984-1996 from IPHC registrations of sport and sport/commercial registrations
 Data from 1997 is from ADFG registration
 Data from 1998-1999 from ADFG logbook program (bottomfish only plus salmon & bottomfish combination trips; combination trips may not include halibut since rockfish caught while salmon fishing is recorded as bottomfishing)
 Data from 1999 is preliminary

FVOA
ALVERSON

Issue 1 support AP recommendation of 12.76% in 2C and 15.61% in 3A.

FVOA would also support a blind of 1995, 1997, 1998 percentages

Issue 2 support the AP recommendation, which is as follows:

- a. Apply management measures as identified in Figure 6.7 of the supplemental analysis for area 2C and in figure 6.8 in area 3A
FVOA recommends the specific measures of bag limits, prohibit crew caught fish and boat limits as the most workable options to accomplish this.
- b. 0-20% reduction measures would be implemented in the season following the overage.
- c. In years of 20% plus overage, the 0-20% measures would be implemented in the following season, and additional measures implemented one year latter to allow for verification of Guided sport catch.
- d. Establish an annual framework process to review and adjust the management measures, which would be implemented in the event of an overage.

3 year rolling average, FVOA testified in support of this option providing the years being considered were not years beyond 2000.

Issue 3

FVOA supports the AP recommendation of option 1 The GHL percentage varies on an annual basis with area halibut abundance.
Apply this percentage to the CEY setting process as outlined below in flow chart provided by the AP minutes

Issue 4 GHL or allocation

FVOA supports the AP recommendation of option 1, this represents current practices and is consistent with the Magnuson Stevens Act objective of achieving OY

Issue 5 establish a moritorium

FVOA advises establishing a cut off date for consideration for participation in an IFQ guided sports fishery and develop a IFQ amendment to the existing IFQ program. To develop a moritorium and a IFQ program will require a tremendous amount of the agency and council activity that are needed in other fisheries.

Public Comment of BRUCE J. GABRYS Given at NPFMC Meeting Held During the Week of February 7, 2000.

Good morning/afternoon Mr. Chairman and Counsel members, thank you for this opportunity to speak today. My name is Bruce Gabrys, representing myself and my fishing family. First, I want to commend the Council Staff for their work on the GHL analysis done since the December meeting. Thanks for a job well done.

I am one of the many small boat fishermen in Alaska that depend upon multiple fisheries to remain economically viable. With the commercial salmon industry in financial disrepair, my family and I are heavily dependent upon the halibut fishery for our economic survival. We have borrowed over \$200,000 to purchase halibut IFQ in addition to the \$250,000 we have invested in the fishery. With biomass declines expected to continue, we are compelled to borrow even more money to stay in business. The ability to obtain financing for IFQ is extremely difficult with the GHL issue hanging unresolved.

I urge you to approve the Guideline Harvest Level (GHL) as a fixed percentage, based on abundance, and expressed in pounds. A fair compromise to set the percentage is to average the 1995 and 1998 harvest levels.

I do not support the proposal to set the GHL prior to deductions for bycatch and wastage. If adjustments for bycatch and waste are to be used in setting allocations, the February 2nd letter to the Counsel from Mr. Leaman of the IPHC outlines an appropriate method to hold user groups accountable for removals under their control.

I am extremely pleased to see the bilateral support from Charter and Commercial operators for converting a Charter GHL into some form of Charter Boat IFQ system. This would shift reallocation decisions out of the Council and into the marketplace. This is the right solution, however development of a charter IFQ system will take a considerable amount of time and a lot of effort and cooperation among the Halibut Charter Boat stakeholders.

I urge the Counsel take final action and approve a Guideline Harvest Level (GHL) with a supporting suite of management measures. As a follow-on task, this Counsel needs to lay the groundwork for the development of a Charter boat IFQ system. The GHL should remain as a guideline and be converted into an allocation upon implementation of the IFQ system.

I support the use of a moratorium to protect the established Halibut Charter operators from a surge of speculative new entrants seeking to cash in on a developing IFQ system. Because each area of the state is unique, with various levels of charter industry development, the local moratorium option is appropriate.

I am in favor of a viable and professional Halibut Charter Fleet for a couple of reasons. First of all, we are neighbors in the community and on the water. Good neighbors work together and help each other. Secondly, I want halibut charter clients to have the best and safest experience possible. The development of a positive public image of the halibut industry, both charter and commercial, benefits us all. Thank you for your time, attention, and dedication.

North Pacific Fisheries Management Council

Distinguished Chair and Members,

Once Again I sit before you, as you consider the issue of GHL.

If you go forward with this plan 1998 logbook data is the only hard numbers you have that are not a guess they are for real.

It sounds as if the only ones that have loans and mortgages are commercial long liners and deckhands. Myself as a stakeholder also have loans and mortgages. For my boat didn't grow on a tree and my advertisement did not pop out of thin air.

I am not a rocket scientist.

But I would like to propose a conclusion to the decline of the halibut resource from an article in the Feb 2000 Alaska Fisherman Journal relating to stock assessment's survey and the responsibility of the commercial long line fleets reduction of the resource. Though no fault of their own the long line fleet may have triggered the accelerated decline of the resource (near shore) in both 2C&3A by removing too much biomass which has caused a decline in eight year old fish. The stock assessment survey halted in 1986 and resumed in 1993. 6 years had passed without any knowledge of what it was doing. In 1993 the surveys were renewed using a different bating scheme that flawed the stock assessment. If you look at the overhead and count any eight years on the chart you start to see increases in the catch rate from the start which probably accounts for the eight year old exploitation.

Then the council started the IFQ program for fishermen based on those surveys that were flawed and allowed between 50-150% more fish to be removed than were there

Therefore I feel as a stake holder that I should not be held responsible for the IHPC change in the model that wasn't as anticipated in setting the TAC that allowed the long line fleet to remove an excessive amount of resource that did not accurately represent the biomass.

Thank you
Donald E. Westlund

FRANK H. MURKOWSKI
ALASKA

COMMITTEES:

CHAIRMAN
ENERGY AND NATURAL RESOURCES
FINANCE
VETERANS' AFFAIRS
INDIAN AFFAIRS

United States Senate

WASHINGTON, DC 20510-0202
(202) 224-8665
(202) 224-5301 FAX

Karen
JOHNSON

222 WEST 7TH AVENUE, BOX 1
ANCHORAGE, AK 99513-7570
(907) 271-3735

101 12TH AVENUE, BOX 7
FAIRBANKS, AK 99701-6278
(907) 456-0223

P.O. Box 21847
JUNEAU, AK 99802-1847
(907) 588-7400

130 TRADING BAY ROAD, SUITE 350
KENAI, AK 99511-7716
(907) 283-5608

108 MAIN STREET
KECHICAN, AK 99901-8489
(907) 225-6880

861 E. WESTPOINT DRIVE, SUITE 307
WASILLA, AK 99654-7142
(907) 378-7665

December 17, 1999

Amy and Moe Johnson
423 Verstovia
Sitka, AK 99835

Dear Amy and Moe:

Thank you for contacting me to share your comments on the North Pacific Fishery Management Council's review of possible action on halibut charter vessels. I am aware that this matter has generated a great deal of controversy.

While other options are also under consideration, the Guideline Harvest Level was suggested as a way of providing assurance to charter operators that they would not be forced to accept in-season reductions during a given year, but would allow the charter harvest to be adjusted during subsequent seasons. It was set at a level higher than currently being taken by charter operators in order to provide a cushion for limited future growth. One reason for this approach was to provide a period during which charter operators could suggest more compatible methods.

I understand the suggestion of a fixed allocation for charter operators was made by the director of the State Division of Sport Fish. For my part, I do not believe that is appropriate. To argue that any user-group should be immunized against its conservation responsibilities is contrary to good resource management. This is, at bottom, an allocation dispute between two types of commercial business operators with the potential for conflict in some areas. I believe the Council is the appropriate arena for this discussion, but to give one party a guarantee of a certain catch level while the other party remained responsible for all reductions necessary for conservation is both unbalanced and unfair.

Thank you again for contacting my office.

Sincerely,



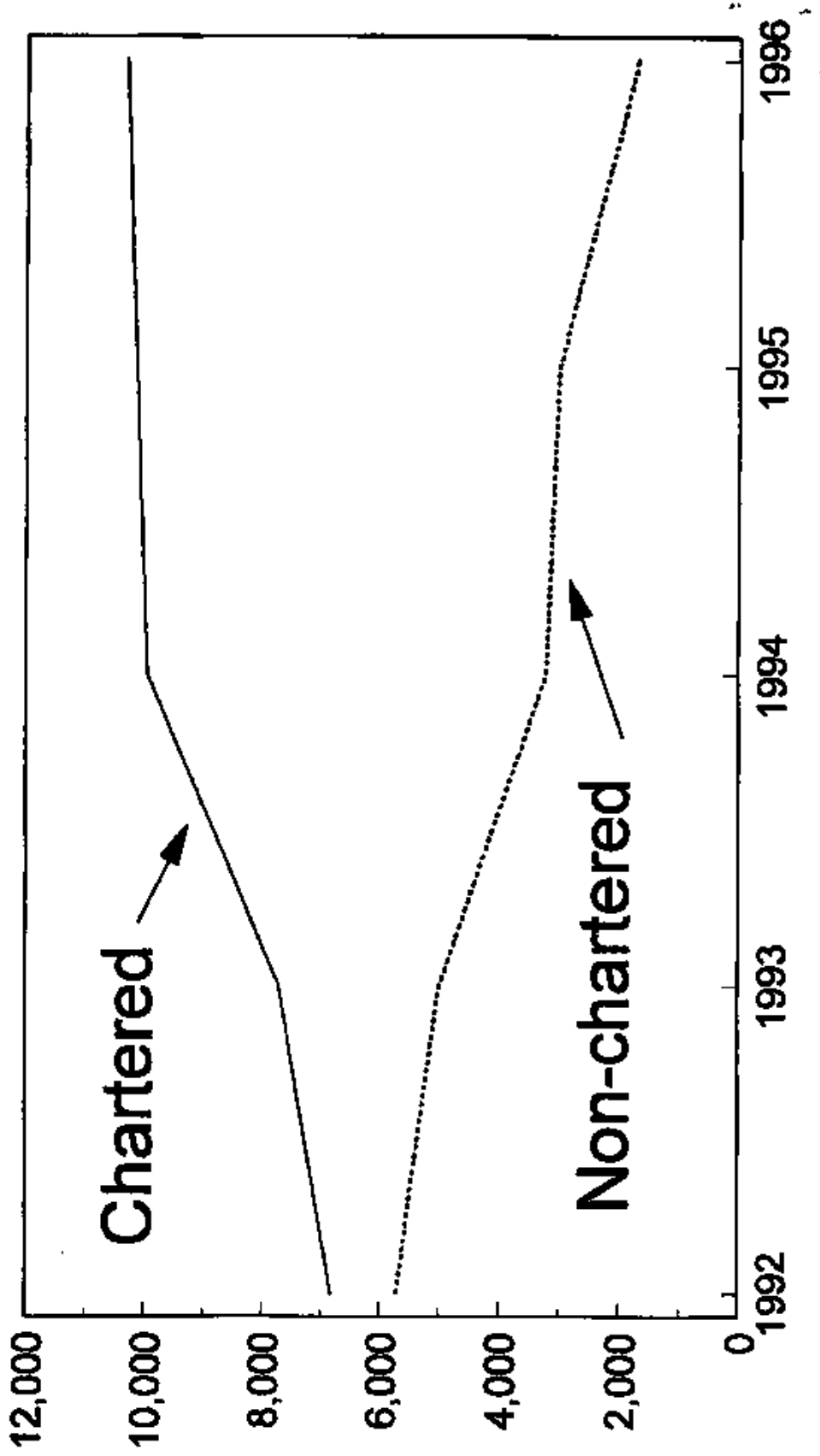
Frank H. Murkowski
United States Senator

Falvey
ALFA

Problem Statement

- Open-ended reallocation
- Overcrowding of productive grounds
- Localized depletion
- Community stability

Halibut harvest by chartered vs non-chartered anglers

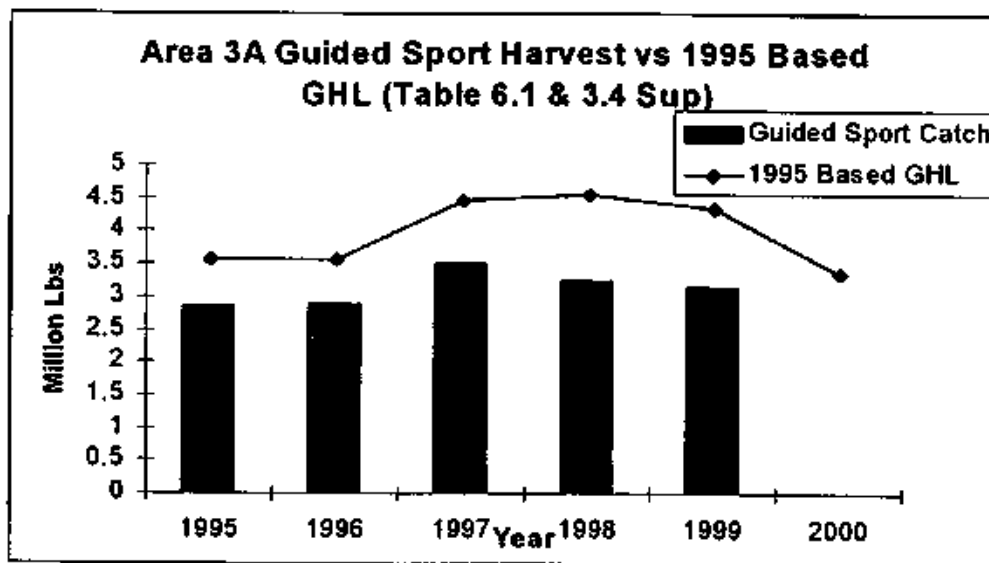
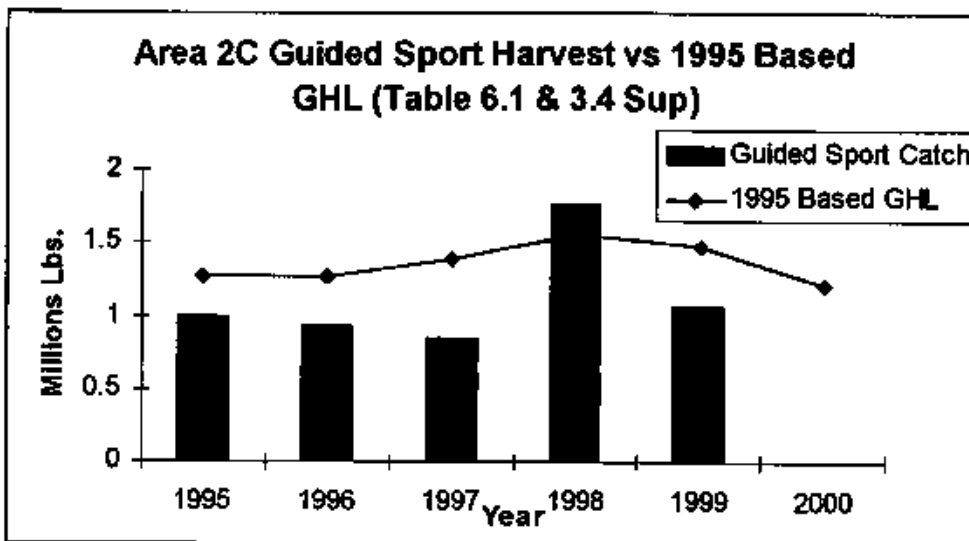


Sitka:

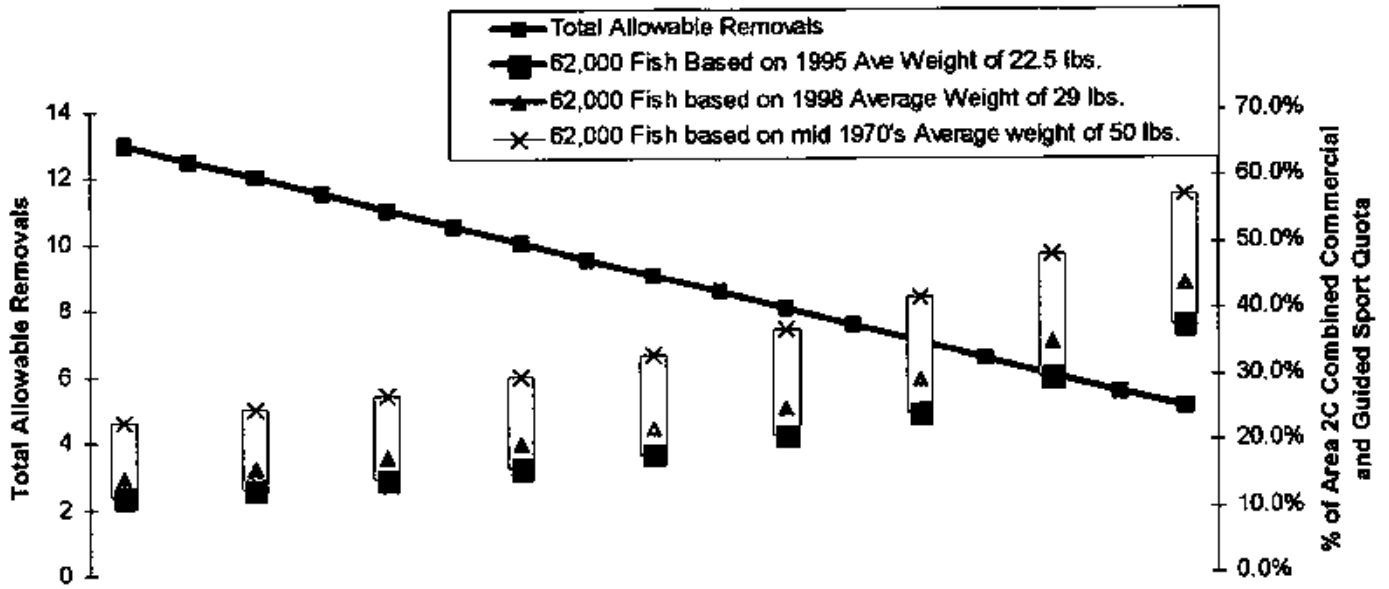
- Distribution of bottom-fishing effort and pacific halibut is changing in the Sitka area. In 1993, 95% of bottom fishing effort and 92% of the Pacific halibut harvest occurred inside Sitka or Salisbury sounds. During 1994, the percentage of bottom fishing effort occurring inside of Sitka or Salisbury sounds had declined to 76% while the harvest percentage declined to 63%
- In 1994, the local charter fleet expended 55% of the total bottom fishing effort in the local area and took 76% of the Pacific halibut harvest.

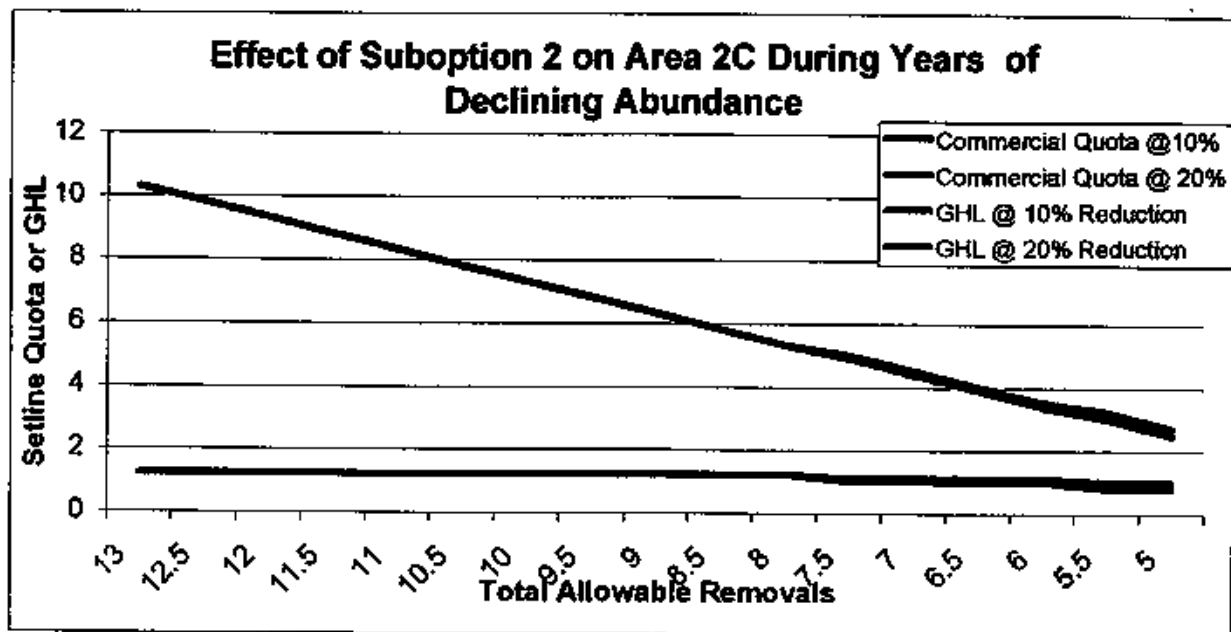
Juneau

- Juneau anglers are currently traveling longer distances to more productive grounds for halibut where HPUE is higher because halibut abundance is low in the local area.



Effect of an Area 2C GHL Based on Numbers of Fish on Allocation % During Years of Declining Abundance





Total Allowable Removals	Commercial Quota	Impact on Commercial Fisherman	Charter GHL	Impact on Charter Fishermen
13.7 million lbs. (1997)	10 million lbs.	<ul style="list-style-type: none"> 1st year of IFQ's, Bought 12,000 lbs. @ \$8/lb * with a 10 Yr. Loan @ 10% QS payment = 69% ex-vessel price** *(Table 3.69, ** Table 3.65) 	GHL set at 125% of 1995 catch 1.2 million lbs.	New skipper buys a charter boat
10 million lbs.	7.3 million lbs.	<ul style="list-style-type: none"> 27% Reduction in catch QS Payment now 84% of Ex vessel gross Economic viability at risk 	No change in GHL 1.2 million lbs.	No change.
9 million lbs.	6.3 million Lbs.	<ul style="list-style-type: none"> 37% Reduction in catch QS Payment now 98% of exvessel Economic viability significantly at risk 	No change in GHL 1.2 million lbs.	No Change
8 Million Lbs.	5.4 to 5.5 million lbs.	<ul style="list-style-type: none"> 46% Reduction in catch QS Payment now 115% of exvessel Other Fisheries must subsidize QS Payment 	GHL @ 10% 1.1 million lbs.	Skipper and crew cannot retain fish
			GHL @ 20% 1 million lbs.	Annual limit of 6 fish 1 fish bag limit in August
6 million lbs.	3.5 - 3/6 million lbs.	<ul style="list-style-type: none"> 65% Reduction in catch QS Payment now 175% of exvessel Files for bankruptcy 	GHL @ 10 .9 million lbs.	Annual limit of 6 fish
			GHL @ 20% .8 million lbs.	Annual limit of 4 fish or 1 fish bag limit

2-09-200 10:11AM

FROM

P. 2

MAYO

February 8, 2000

North Pacific Fisheries Management Council
Anchorage Meeting
February, 2000

Dear Council,

As the holder of the Sport Fish Seat on the Sitsa Board of Fish & Game Advisory Commission, I would like to make a few statements about the halibut allocation issue. I was born in the Territory of Alaska and have lived here all my life. As a true sport fisherman (non-guided/resident), I have never had a quarrel or allocation problem with the commercial halibut fleet. The sport fisherman and the commercial fisherman have fished in harmony for many decades. The new allocation problems are due solely to the increase in demand for fish by the charter industry. When I was a child, and there were plenty of commercial halibut boats around, I could still catch a halibut easily, close to town. This possibility went away with the onslaught of a large charter fleet around Sitsa.

I urge you to recognize the exponentially growing charter industry for what it is - an industry/commercial enterprise. I support a one fish bag limit per day for the charter industry and also a percentage quota. I do not support a fixed poundage quota for the charter industry. Another point I would like to make is that at present there is no size limit for sport caught halibut. Many times I have seen ping pong paddle size halibut going over the rail of a charter vessel. Maybe it's time to give the sport industry a size limit.

In closing I would like to urge you to consider the historical use of the halibut resource in Alaska. The commercial industry has done a wonderful job of conservation and stock rebuilding. I ask you to remember that there is a difference between a true sport fisherman and the charter industry. One fishes for himself and his family, and the other fishes for money.

Sincerely,



Brian D. Massey
Sitsa Board of Fish & Game Advisory Commission
Sport Seat

Wednesday, February 09, 2000

Steven F. Gebert
9357 Northland St.
Juneau, AK 99801

Mr. Rick Lauber
Chairman of the North Pacific Council

Dear Mr. Lauber and North Pacific Council Members:

I am writing this letter as an attempt to get the views of the silent local resident sport fisherman known. I have been an Alaska resident since 1975. I have been involved with sport fishing in the Juneau area since the mid 80's, and know quite a few sport fishermen who feel the same way I do. I have been involved in ADF&G task forces in the past and most recently am a member of the local advisory committee, although I am not speaking for the committee but rather as a concerned local fisherman.

I feel that the allocation of the halibut harvest in the Juneau area needs to be examined. While I personally like the idea of limited entry for halibut charter operations I think that in this context those advocates of that process are doing it for the money that those permits will be worth. Limited entry by itself is not the answer but is only part of the solution. In Juneau, the majority of the sport catch is caught by the non resident guided angler. Most of the local halibut fishermen tell me that they have to go increasingly farther out from Juneau to catch halibut and feel that it is because the charter operators sit on top of the fish until they are fished out. In recent years I have not been able to find a spot for halibut within 30 to 45 minutes of Juneau that doesn't have several charter boats already there. In fact that is how I generally am finding halibut nowadays, I look for the charter fleet and anchor right next to them.

In summary:

- > Guided charter is a commercial entity that should be treated separately from the resident sportsmen.
- > Guided charter is impacting the positive aspect of sports fishing in the Juneau area.

I think that limited entry with an allocation of halibut for the charter industry is the solution. The nonresident angler is reaping the benefits of the sport allocation as it is. The bulk of the halibut catch in this local area has shifted from the resident sport angler to the nonresident sport angler. They are separate and distinct user groups. I think that if an Alaska resident goes out on a halibut charter then the catch from that angler should count against the resident allocation, or at least not be counted against the charter allocation. But the non resident angler should be fishing towards an established harvest level and when they approach that ceiling they can be regulated back by cutting bag limits and by other means. The combination of the limited entry and established allocation would provide tools to the managers to control the unprecedented growth of the charter industry and provide a means to allow the resident angler a chance at some fish.

In summary:

- > I would like an allocation in areas 2C and 3A between nonresident charter and resident Alaskan fishermen.
- > Tools that might be used are bag limits for nonresidents charter fishermen and increased fees to pay for additional management.

I feel as if my families enjoyment of the outdoors is being taken from us as we court the tourist dollar. I appreciate that the charter operators need to provide for their families also and feel that recognizing them as a commercial entity is the solution. Frankly, if this means that a tourist from Oklahoma doesn't take home the poundage of fish that he feels justifies his trip expense then he can buy extra halibut from the commercial fleet. This doesn't affect those charter operators that promote catch and release, what it affects is the poundage of halibut that leave the state in coolers.

Thank you for your consideration of this letter and your efforts in this matter

Sincerely



Steven F. Gebert

§ 10.201

46 CFR Ch. I (10-1-98 Edition)

the dangerous drug laws of the United States, the District of Columbia, or any State or territory of the United States is eligible for a license or certificate of registry, except as provided by the provisions of paragraph (h) of this section. No person who has ever been the user of, or addicted to the use of, a dangerous drug, or has ever been convicted of an offense described in section 205 of the National Driver Register Act of 1982 (49 U.S.C. 33304) due to the addiction or abuse of alcohol is eligible for a license or certificate of registry unless he or she furnishes satisfactory evidence of suitability for service in the merchant marine as provided in paragraph (j) of this section.

(f) Except as provided in § 10.401(i) of the part, an applicant for a license must demonstrate an ability to speak and understand English as found in the navigation rules, aids to navigation publications, emergency equipment instructions, machinery instructions, and radiotelephone communications instructions.

(g) An applicant for a license must meet the requirements for recent service specified in § 10.202(e).

(h) No license or certificate of registry may be issued to any person who is not a citizen of the United States with the exception of operator of uninspected passenger vessels limited to vessels not documented under the laws of the United States.

(i) Except as specified in this paragraph, no license or certificate of registry may be issued to a person who has not attained the age of 21 years.

(1) A license as master of near coastal, Great Lakes and inland, inland, or river vessels of 25-200 gross tons, third mate, third assistant engineer, mate of vessels of 200-1000 gross tons, highest control operator, assistant engineer (MCHT), assistant engineer of fishing industry vessels, second-class operator of uninspected towing vessel, radio officer, assistant engineer (limited-oceans), or designated duty engineer of vessels of not more than 1000 horsepower may be granted to an applicant who has reached the age of 18 years.

(2) A license as limited master of near coastal vessels of not more than 100 gross tons, limited master of Great Lakes and inland vessels of not more

than 100 gross tons, mate of Great Lakes and inland vessels of 25-200 gross tons, mate of near coastal vessels of 25-200 gross tons, operator of uninspected passenger vessels, or designated duty engineer of vessels of not more than 1000 horsepower, may be granted to an applicant who has reached the age of 18 years.

(j) Persons serving or intending to serve in the merchant marine service are recommended to take the earliest opportunity of ascertaining, through examination, whether their visual acuity, and color vision where required, are such as to qualify them for service in that profession. Any physical impairment or medical condition which would render an applicant incompetent to perform the ordinary duties of an officer at sea is cause for denial of a license.

(k) *Criminal Record Review.* The OCMI may review the criminal record of an applicant for the issuance of a license or certificate of registry issued as an original or renewed with a new expiration date. An applicant conducting simultaneous merchant mariner's credential transactions shall undergo only one criminal record check. Applicants must provide written disclosure of all prior convictions at the time of application.

(l) If the applicant is advised that a criminal record check is required by the OCMI, applicants shall provide their fingerprints at the time of application. The fingerprints will be used to determine whether the applicant has a record of a criminal conviction. An application may be disapproved if a criminal record review leads the OCMI to determine that the applicant's habits of life and character are such that the applicant cannot be entrusted with the duties and responsibilities of the license or certificate of registry for which application is made. If an application is disapproved, the OCMI will notify the applicant in writing of the reasons for disapproval and advise the applicant that the reconsideration and appeal procedures in § 1.03 of this chapter apply. No examination will be given pending decision on appeal.

(2) The OCMI may use table 10.201(i) to evaluate applicants for licenses and



KAKE TRIBAL CORPORATION

P.O. Box 289 • Kake, AK 99830 • (907) 785-3221 • Fax: (907) 785-8407

KAKE TRIBAL CORPORATION RESOLUTION 00-01

A KAKE TRIBAL CORPORATION RESOLUTION SUPPORTING THE 1997 GUIDELINE HARVEST LEVEL SET BY THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL, AND SUPPORTING AN ABUNDANCE BASED ALLOCATION FOR ALL USERS OF THE HALIBUT RESOURCE.

WHEREAS: The history and culture of Kake is one of Commercial and Subsistence fishing and,

WHEREAS: The people of Kake are concerned with the rapid expansion of the Halibut sport fishery, and,

WHEREAS: Kake Commercial Fisherman, and other Area 2C fishermen have supported conservation by accepting low quotas when the biomass was low. Kake Tribal Corporation Board of Directors agrees that all segments of the industry should share in the profit and loss of the fishery, and no segment should be immune to conservation.

WHEREAS: Many people in the community are employed directly or indirectly by the Commercial Halibut Fishery, and

WHEREAS: The vast majority of income produced from the Commercial Halibut Fishery circulates throughout the community, and

WHEREAS: Kake Tribal Corporation acknowledges the social and economic value of the Commercial Halibut Fishery to our community, to Pelican where we own another Processing Plant, and to the State of Alaska, and

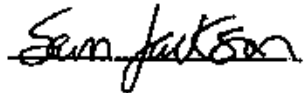
WHEREAS: A significant number of community members have invested in IFQs, and a reduction in the Commercial Halibut Harvest would reduce individuals abilities to pay incurred loans on their vessels, IFQs, and other costs of living, and

NOW THEREFORE BE IT RESOLVED, that the Kake Tribal Corporation Board of Directors supports an abundance based allocation for the guided sports Halibut Fishery, and supports the 1997 Guideline Harvest Level already adopted by the North Pacific Fisheries Management Council, and

KAKE TRIBAL CORPORATION 217-501-1000 FAX 217-501-1000
FEB 04 00 217-501-1000 FAX 100

FURTHER BE IT RESOLVED, that Kake Tribal Corporation urges the North Pacific Fisheries Management Council to adopt effective measures that will keep the guided sport Halibut fishery within their allocation.

This resolution was duly adopted at a Kake Tribal Corporation Board of Directors meeting held this 3rd day of February, 2000 by a quorum vote of 9 with 9 yes votes, 0 no votes, and 0 abstaining.



Sam Jackson
President/CEO



Attested by
KTC Boardmember

Petersburg Vessel Owners Association

P.O. Box 232

Petersburg, Alaska 99833

Phone (907) 772-9323 Fax (907) 772-4495

1.) "No action" is not an option for the longline fleet.

- Past annual growth of the charter harvest, (+5% in 3-A and +11% in 2-C), in conjunction with projected declines in halibut abundance beyond 2000, (- 14% in 2-C and - 21% in 3-A), makes an untenable situation for IFQ fishermen.

2.) There is no status quo alternative for the longline fleet.

- Each alternative requires the longline fleet to forgo more harvest (percent).
- Each alternative gives the charter fleet increased harvest (percent).

ISSUE 1

3.) A GHL as an annual percentage in pounds is fair and equitable, as the Council previously determined in its 1997 action.

- A percentage rises and falls with abundance and shares in conservation.
- IPHC assesses biomass in pounds. IFQs are in pounds. Bag limits are in fish. Annual pounds can then be converted to fish using average weight.

5.) The 1997 Council action of a % GHL (based on 125% of 1995) was a compromise selected from a range of alternatives after four years of Council discussion. **If the Council considers departing from that decision, there must be compelling reasons and justification.**

- No one can argue there has not been sufficient public notice. The only changed circumstances has been a decline in abundance. In light of the problem statement, i.e. open ended reallocation, this projected decline is more the reason for the Council to stand by the original decision.

- The 1995 harvest represents an historic fair share of harvest. 125% of 1995 represents **more than a fair share** and calculated at peak abundance.
- The 1998 harvest represents an anomaly in 2-C for average weight per fish that increases harvest (+ 40%) without catching one additional fish. 1998 does not represent fair nor historical sharing in 2-C.

5.) A GHL as a fixed harvest amount (pounds or fish) is inequitable as decreasing abundance increases the allocation percentage and does not proportionately share conservation.

6.) Use of a three year rolling average will prevent implementation of management measures up to five years from adopting a GHL. This is an unacceptable continuing de facto allocation to the charter fleet.

7.) The option to calculate the GHL prior to commercial bycatch makes the longline fleet the only commercial user group to be reduced for all bycatch, most of which is from non-longline harvest. All commercial users, i.e. both charter and longline should bear this burden, as in the AP motion.

- The charter halibut fishery must take into account its own incidental mortality on released halibut, approximately 300,000 pounds annually.

ISSUE 2

8.) Effective management measures are few and far between. The SSC has noted their concerns to this as well as the need for inseason management.

- The GHL Committee was charged by the Council in 1997 to come up with meaningful management measures. The result after two years is that the GHL Committee suggested none of the management measures rated effective (“++” or “+++”) in the analysis and all of the management measures rated having “no” effect.
- An additional management measure should be added, the pre-season announced inseason change in bag limit. This tool can be used for a variety of lengths of time, i.e. one month, two months, etc. and not just confined to the example in the analysis addendum.

- Management measures should be implemented no later than one year after the GHL has been reached.
- An annual limit in 3-A may impact Alaskan residents more than in 2-C. Other management measures in 3-A may be more appropriate. A reduced bag limit for a longer duration may be more preferable (less onerous) than a low overall annual limit in 3-A..

ISSUE 3

9.) Varying halibut abundance is best addressed with the GHL as a percentage on an annual basis. Fixed harvests will need a complex series of trigger levels to emulate abundance changes. At present, these trigger serve only to reallocate to the charter fleet. Triggers can only approximate that which is best done by a percentage.

- p. 200, "...Suboption 2 would not trigger reductions in the range until total harvests had been reduced 42-70%."
- p. 12, Addendum [Impacts of using fixed number of fish], "Should a return occur to low productivities that were seen in the mid 1970s...it is possible that the charter fleet, having been awarded 136,000 fish would have been allocated 68% of the combined charter/commercial quota."

ISSUE 4

10.) A GHL is the original intent of the Council, not an allocation that leads to unutilized harvest or a banking system that results in harvest unrelated to annual productivity.

ISSUE 5

11.) An area moratorium will address fleet capacity and interim concerns as to new entrants but could disadvantage small communities relatively undeveloped for charter. These communities such as Kodiak, would best be served by LAMPs or establishments of statistical sub-areas, if possible. These sub-areas are not intended to be relieved from the GHL but to have different moratorium criteria than the area moratorium as that local region seems fit.

IFQs for Charters

This concept has merit but may prove to be a complex and lengthy task. This action should be pursued but as a separate action from the GHL. The GHL will provide impetus to the IFQ process. To date, the track record for progress in charter management from input from the charter fleet has been poor. Historically, there was considerable resistance against logbooks and meaningful management measures. In the event that the IFQ process gets bogged down, the GHL is essential.

In the consideration of the GHL and moratorium, the Council should take into account that an IFQ system may be developed. The design of the GHL and moratorium should be to facilitate IFQs and not preclude or make it more complicated. For example, a percentage based GHL best addresses this.

The Council may also want take into account the precedent and complications of an IFQ program that gives entrants their best year plus 25%.

1999 SPORT FISHERY by Calvin Blood, IPHC

Source: IPHC REPORT OF ASSESSMENT AND RESEARCH ACTIVITIES 1999, pages 42-43

Area 2-C

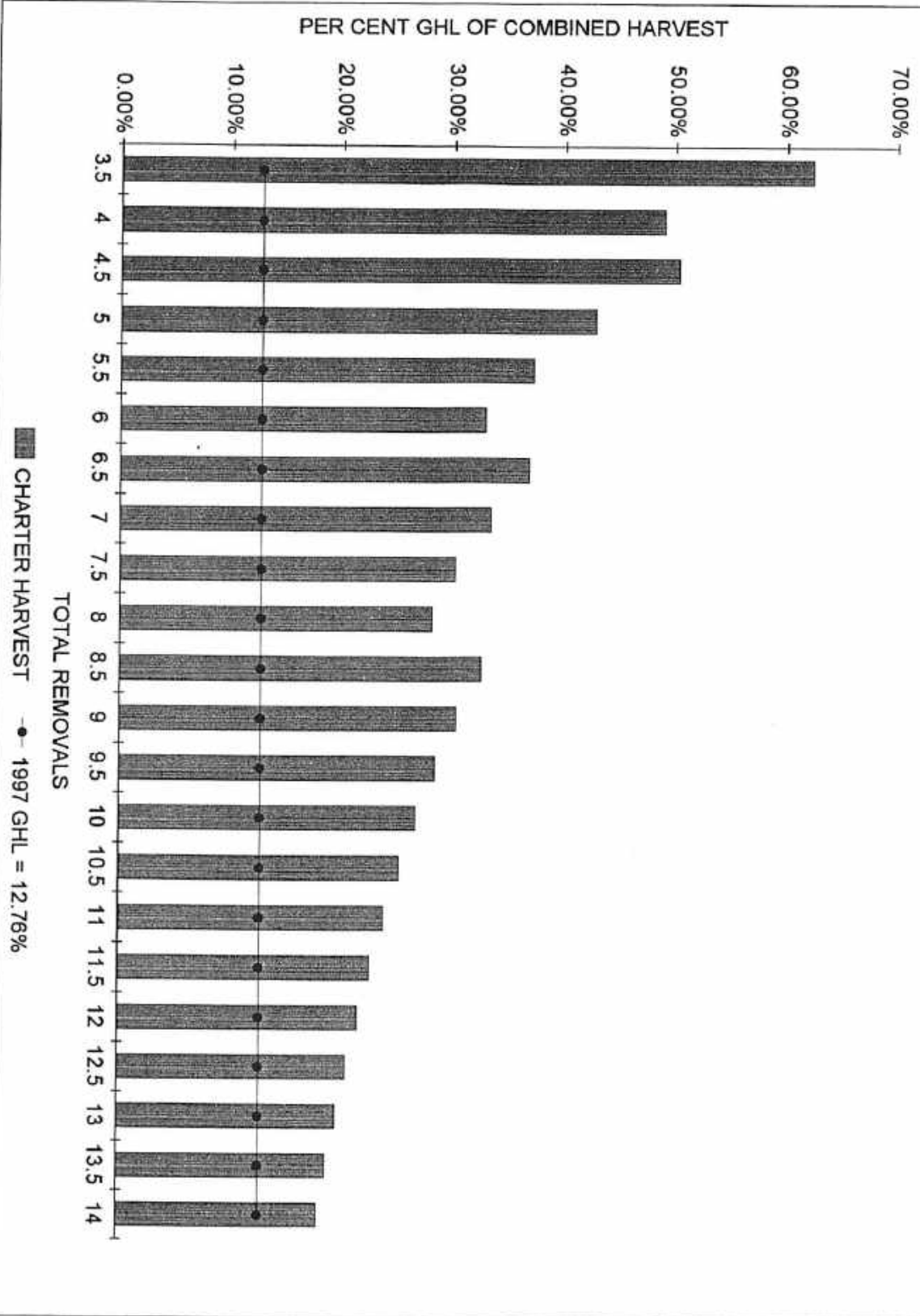
“The 1998 harvest in pounds increased significantly (about 60%) from 1997 levels in 2-C (southeastern Alaska) (Table 3). This increase was primarily due to increased in the harvest and effort from remote areas which ADF&G does not sample and therefore could not predict such an increase. Additionally, 1998 average weights were the highest recorded. However, using preliminary harvest data from the on-site creel surveys, the [1999] harvest appears to be down to pre-1998 levels in all areas except Sitka. Average weight in 1998 ranged from a high of 40.1 pounds in the Petersburg-Wrangell area to a low of 16.4 pounds in Ketchikan. The projected 1999 biomass harvest is expected to be much lower than 1998 levels. Preliminary analysis of average weight data for 1999 showed a high of 30.6 pounds for the Petersburg-Wrangell area and a low of 14.2 pounds near Prince of Wales Island. Changes were made in catch sampling programs to increase the number of halibut measured at various sites in 1999. **Average weights were down in several areas by 5 to 10 pounds. This also contributes to the 1999 harvest returning to pre-1998 levels.**”

Area 3-A

The Area 3-A (Cook Inlet, Kodiak, Gulf of Alaska, Prince William Sound and Yakutat) 1998 harvest in pounds decreased by about 7 percent from 1997 levels (Table 3). The harvest in numbers of fish decreased by 2 percent and the average weight decreased to 18.9 pounds in 1998 from 20.2 in 1997. The mean weight varied from a high of 35.4 pounds in Yakutat to a low of 16.0 pounds in Deep Creek and Anchor Point.”

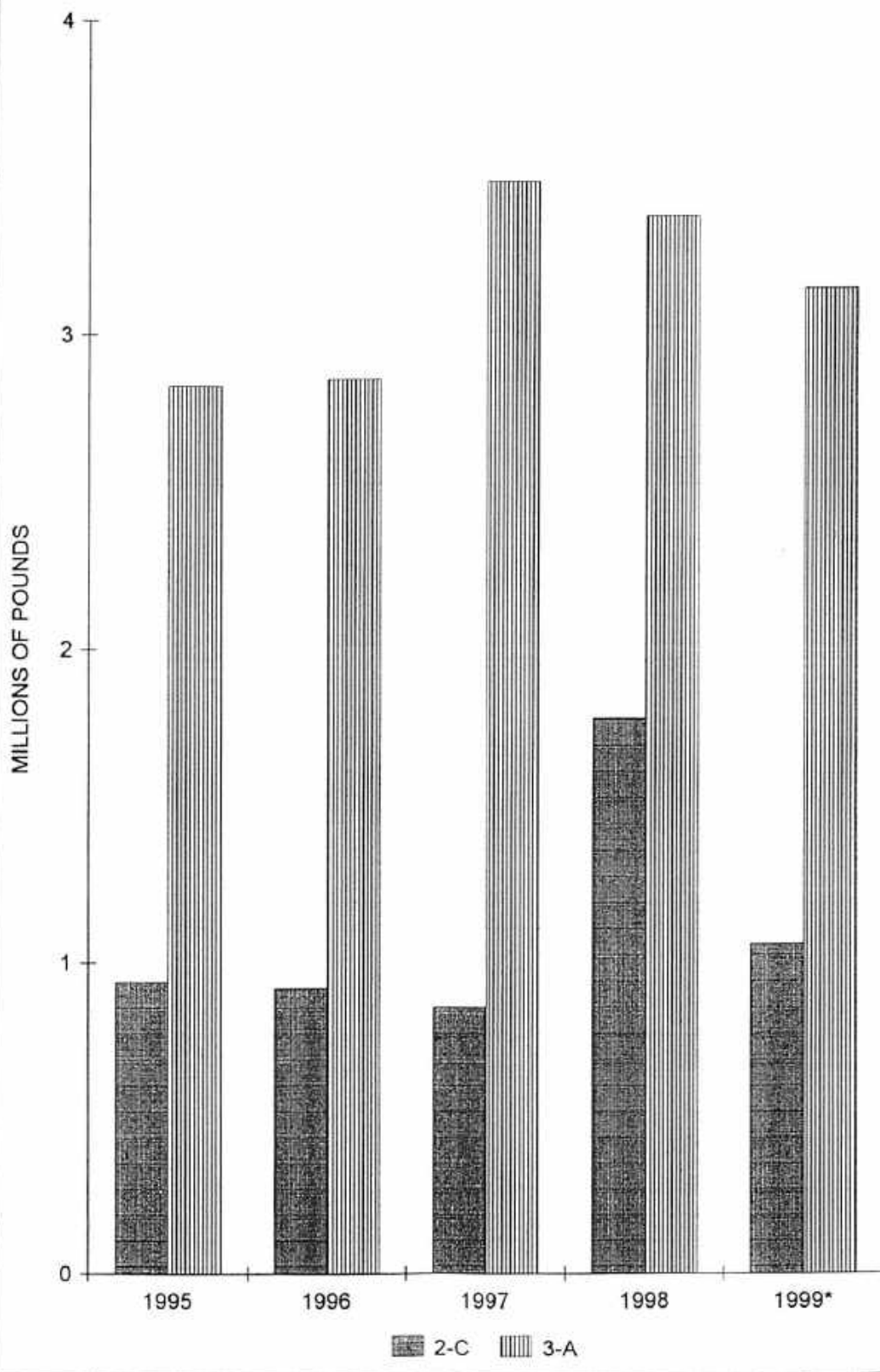
ADJUSTED*FIXED HARVEST (125% of 1998)

With 20% Reductions at 8 M, 6 M, & 4 M



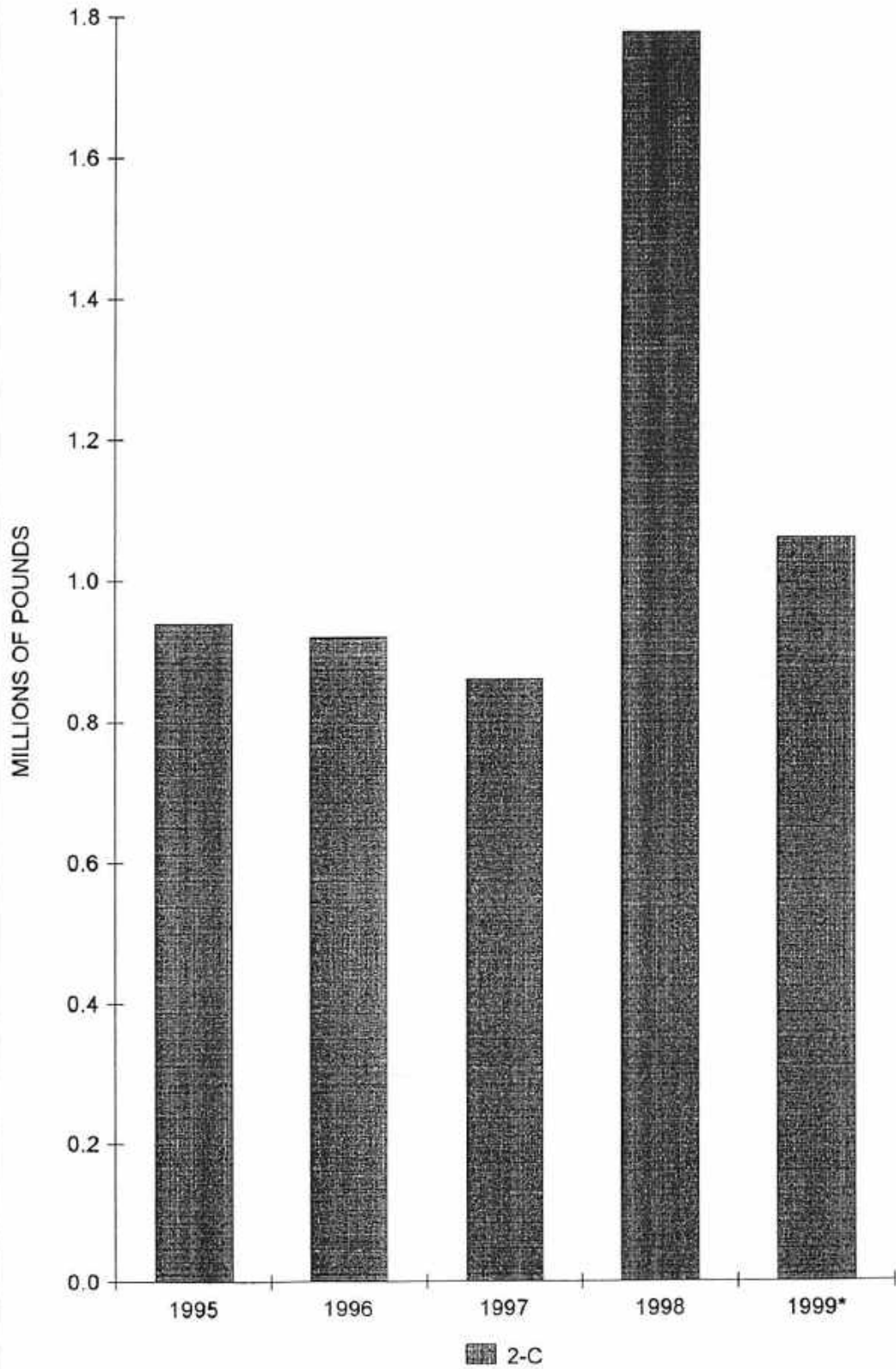
2-C & 3-A CHARTER HALIBUT HARVEST

from Table 3.4, p. 13 of the Addendum



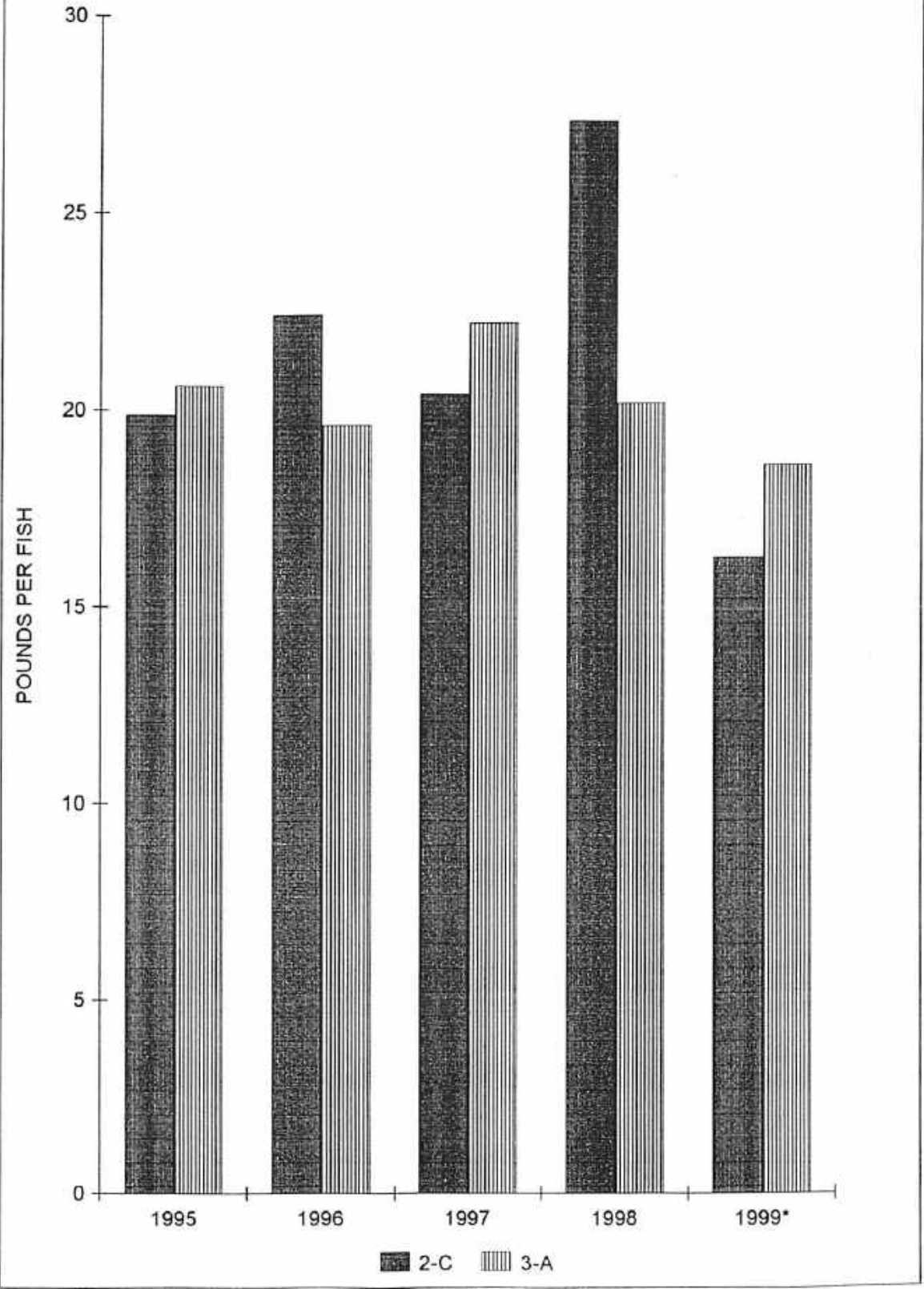
2-C HALIBUT CHARTER HARVEST

from Table 3.4, p.13 of the Addendum



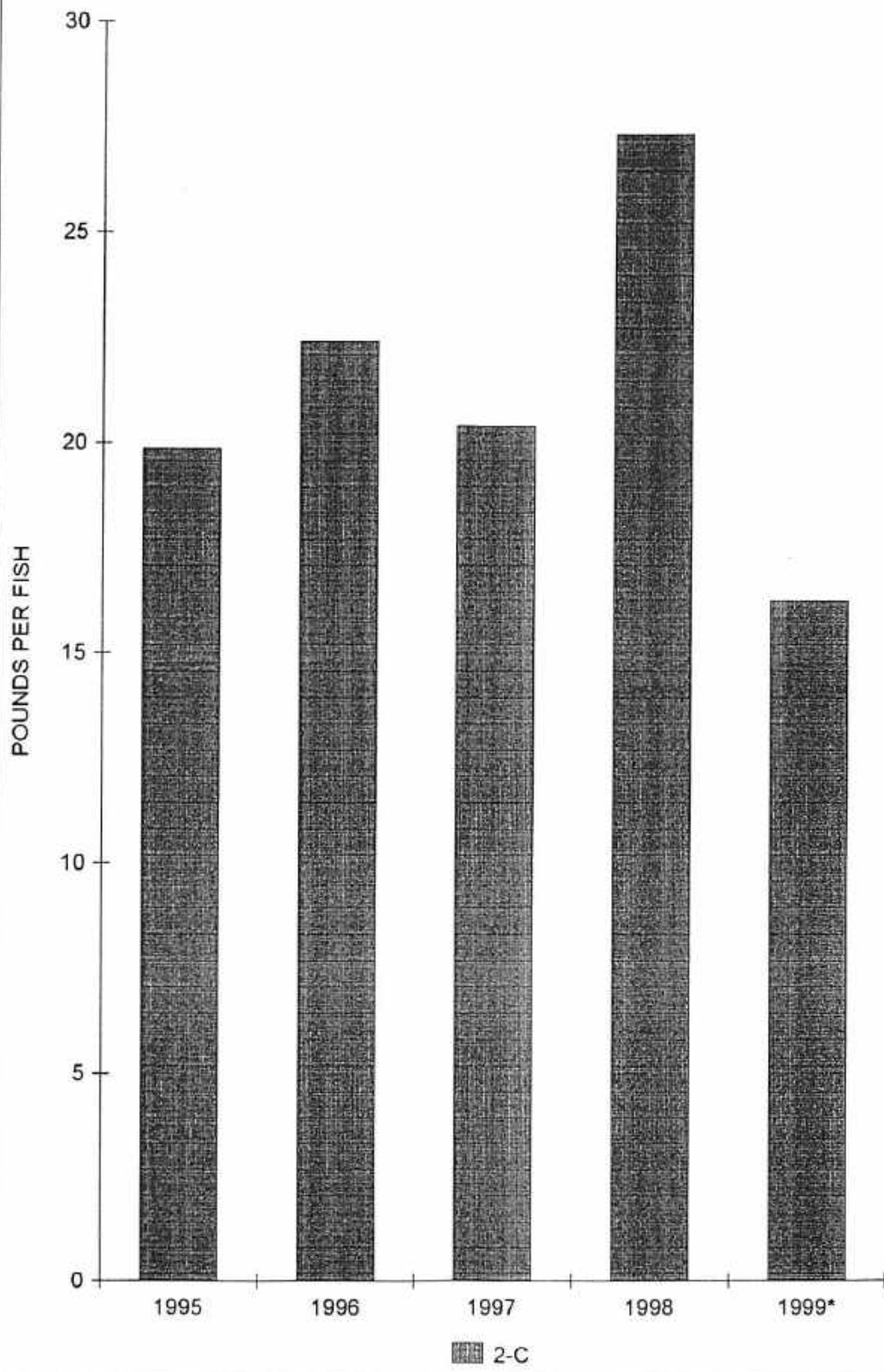
AVG. WEIGHT HALIBUT IN CHARTER HARVEST

Individual Fish in IPHC Areas 2-C & 3-A



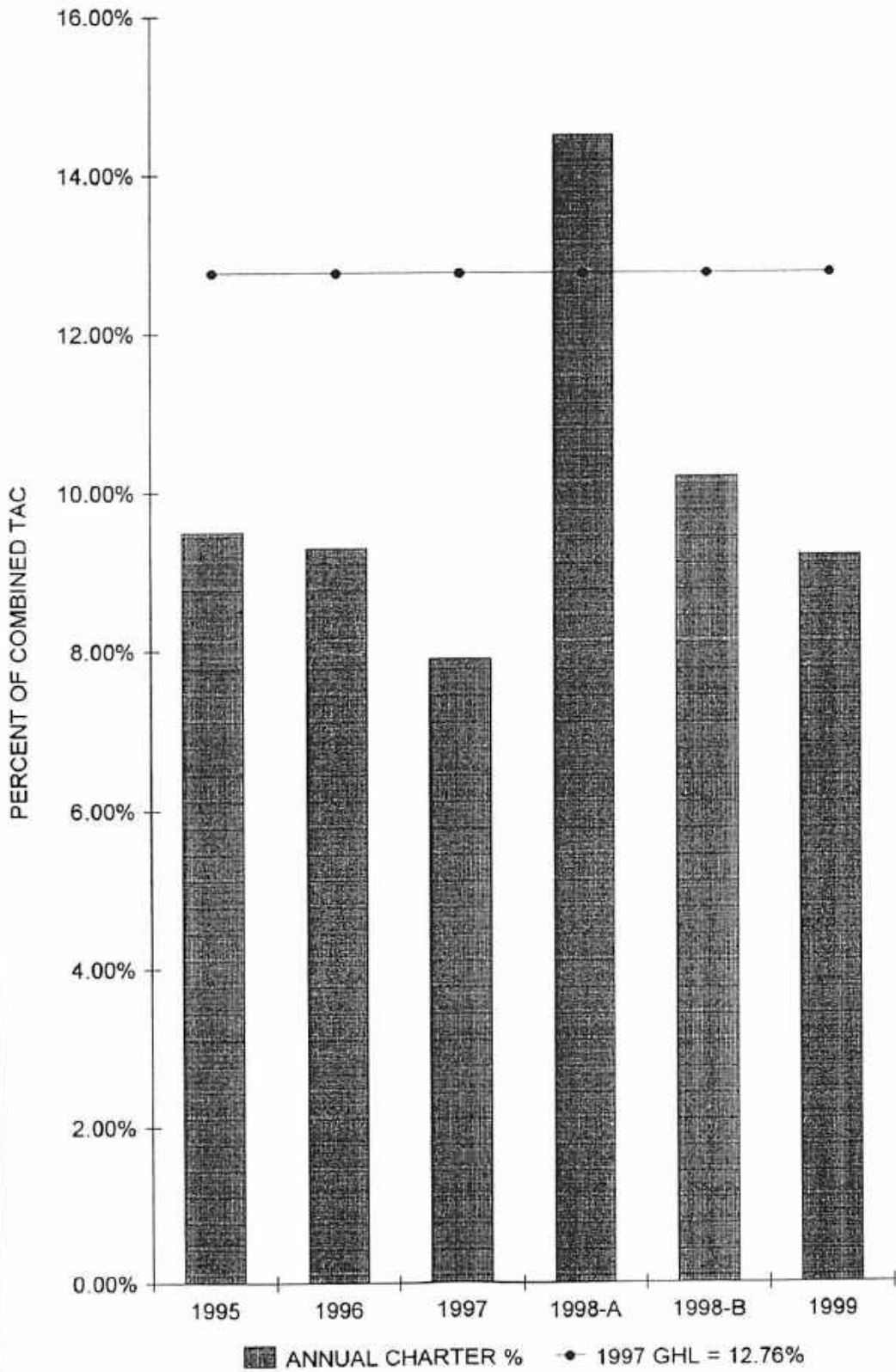
AVG. WEIGHT HALIBUT IN CHARTER HARVEST

Individual Fish in IPHC Areas 2-C & 3-A



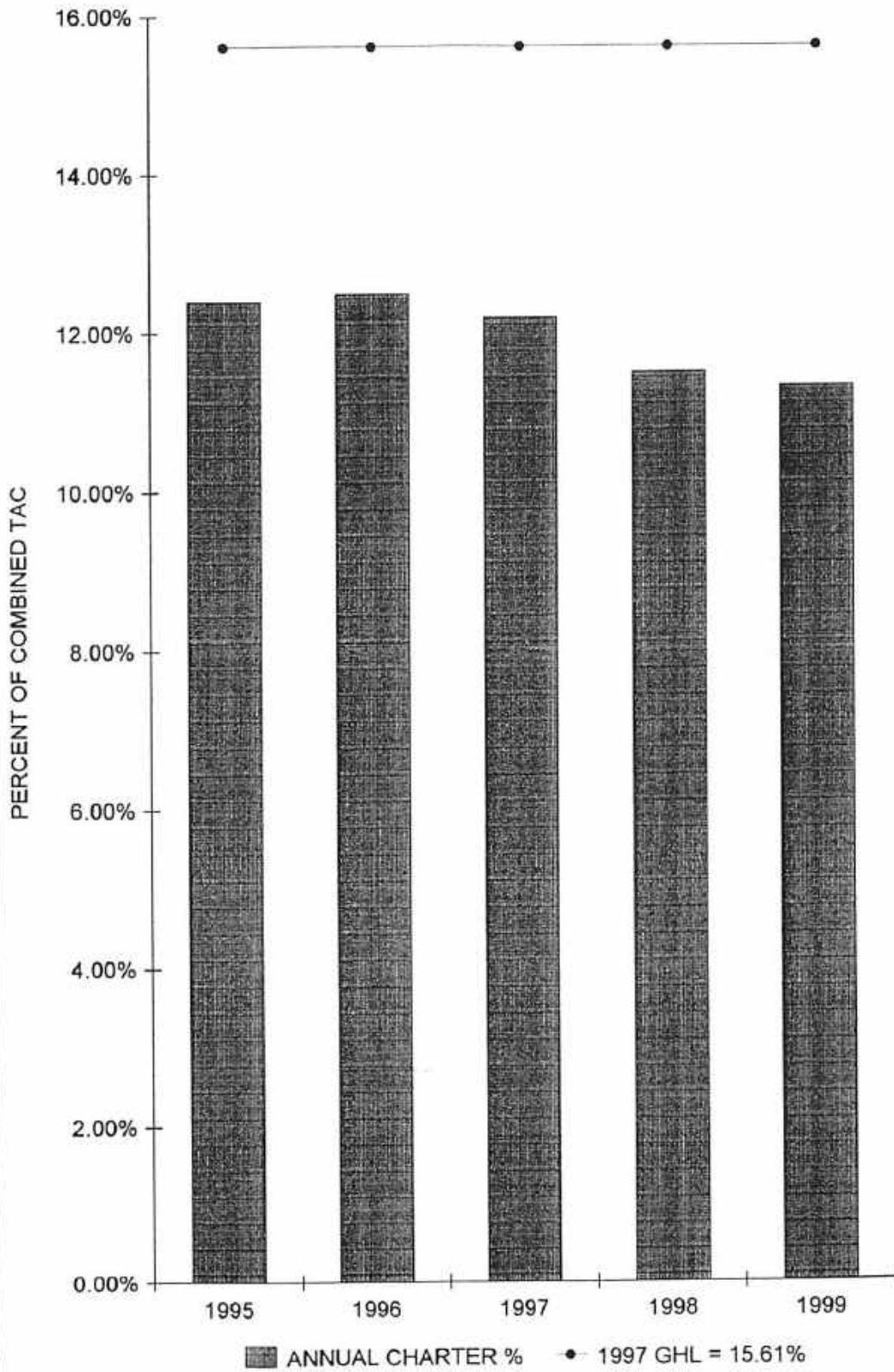
CHARTER % OF COMBINED TAC IN 2-C

Combined TAC = Comm. + Charter



CHARTER % OF COMBINED TAC IN 3-A

Combined TAC = Comm. + Charter



ESTIMATED INCIDENTAL MORTALITY OF HALIBUT IN THE 1998 CHARTER HARVEST

2-C

Fish Released = 29,233

Incidental Mortality Rate = 10%

Average Weight per Fish = 27.7 pounds

**Incidental Mortality = 29,233 x 10% x 27.7 lbs.
= 80,975 pounds.**

3-A

Fish Released = 147,743

Incidental Mortality Rate = 10%

Average Weight per Fish = 21.3 pounds

**Incidental Mortality = 147,743 x 10% x 21.3
= 314,693 pounds**

2-C/3-A 1998 Incidental Mortality = 395,668 lbs.

*** Incidental mortality range from IPHC is 5% to 25%. Ten per cent incidental mortality is an estimation from personal communication with IPHC staff.**

Yuff

Halibut Guideline Harvest Level for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to adopt the 1997 Guideline Harvest (125% of the 1995 charter boat harvest) as an allocation between charter boats and IFQ holders. The allocation should be based on the historic catch level established in 1997 and should be a percentage of the combined commercial and guided sport halibut harvest so that the charter harvest is linked to the abundance of the halibut resource. The commercial harvest of halibut is critical to our jobs, families, and communities. Furthermore, we urge the Council to adopt effective management measures that restrict the guided sport sector to the GHL allocation.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Tom Pratt	710 SIRSTAD	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
John Williams	803 HPR	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Don Byrd	2701 HPR SITKA	2	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Dea Weck	803 Lake St. SITKA	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
[Signature]	3510 HPR	1	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
[Signature]	6108 SWL [Address]	1	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Wayne Westover	PO BOX 1023 SITKA ALASKA 99835	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Rafe Allensworth	P.O. BOX 862 SITKA AK 99835	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Larry Dennis	P.O. Box 6365 SITKA, AK 99831	3	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Greg Jolley	PO BOX 252 SITKA, AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
John Reno	P.O. Box 182 SITKA	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Jerry A. Tish	Box 1634 Sitka 610 SMC Alaska	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Frank Burkhardt	1613 SMC Sitka	4	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Wayne Young Wayne Young	2216 HPR (P.O. Box 1244) SITKA ALASKA		<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
William Cain	413 Regatta St. SITKA AK.	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Richard Swin	704 LAKE ST BOX 1286 SITKA AK	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Ernest M. Parker	509 Mansfield Box 761 Sitka AK.	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
John Kelly	1982 H.P.R. SITKA, AK. 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Alan Borbridge	P.O. Box 6272 SITKA AK 99835		<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Charlotte Bernhardt	P.O. Box 1293 Sitka, AK	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Bill Bernhardt	101 Shuler Dr. Sitka, AK		<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Jeff Stewart	306 Nicole Dr SITKA AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
James Lange	Box 6475 Sitka, AK 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Charlie + Melody Hazel	609 Etolin SITKA AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Robert & Suzie FRENCH	1919 DOUGLASS CIRCLE	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Stu Peter	107 R.W.C. SITKA, AK 99835	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Joel Peters	507 SMC SITKA AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Dennis A. Ane	29 KB Apt. 910 HPR SITKA, ALASKA 99835	6	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input checked="" type="checkbox"/> Processor worker
VERN WAKEFIELD	PO BOX 918 SITKA AK, 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Mark X Reid	Box 1201 Sitka AK.	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Anthony J. Wynn	BOX 2495 SITKA, AK	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
midao hittedid	PO BOX 2953 SITKA	6	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Vidal R Quintana	P.O. Box 931 Sitka, AK	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input checked="" type="checkbox"/> Processor worker
Wm. Sumner	Bx 106 Sit - AK	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
William E. Jolley	1402 Edgcomb Dr PO Box 282 Sitka AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Kenny Winsor	Box 1435 Sitka, AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Sharon IRWIN	Box 1286 Sitka Alaska 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Louis Howard	113 New Anchorage Sitka, AK 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Monte Young	P.O. Box 1365 Sitka, AK 99835	3	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Frank Moore	120 Osprey Sitka AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
<i>Robin H. Truman</i> Robin H. Truman	704 B LAKE ST, SITKA, AK 99838	3	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
<i>Steven R. Edenshaw</i> Steven R. Edenshaw	100 Andrew Hope Sitka AK. 99835	5	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
<i>Roger A. Berra</i> Roger A. Berra	262 Logwood JON SITKA AK 99835-7574		<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
<i>LARRY STEPHENS</i> LARRY STEPHENS	2309 HPR #19 SITKA, AK 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Dylan Haley	500 Lincoln #1A Sitka AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Robert P. Leighton	P.O. Box 2001 Sitka, AK 99835	4	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Gary May Sr.	301 Marine St. Sitka AK 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Bat Kilian E. Kilian	445 Kirkman Way Sitka, Alaska 99833	1	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
ROBERT WATSON	POB 6201 SITKA AK 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Madon Simpson	2811 HPR #C Sitka, AK, 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
SCOTT K. SALINE	Bx 3183 SITKA ALASKA 99835	3	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
C. D. Tandy	406 Hirst Apt. A Sitka AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Ben Contag	Hidden Falls Hatchery		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Steve Kost	PO Box 1391 SITKA AK 99835		<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
ED LALY	617 Katlian #E 33 Sitka AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Neil Hoff	102 KRESTOF Dr SITKA	4	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

DATE _____

Page _____

February 8, 2000

Dear Councilmen,

The halibut sportfishing issue has been a topic of discussion between commercial fishermen and sportfishermen (nonguided and guided) for the last seven years. It seems a little lopsided at the bargaining table; commercial fishermen and government officials make up the majority and not one sportfisherman is represented. We need equal representation on the council and according to the Magnuson-Stevens Fishery Conservation and Management Act the Secretary by law is required to "ensure a fair and balanced appointment ... in the commercial and recreational fisheries under the jurisdiction of the Council". Has that happened? I don't think so.

Another matter of concern is the way the Council has grouped most of the states sportfisheries together without looking at the individual circumstances of each port (for example Sitka's growth as compared to Homer's in the last few years).

When allocating a resource it is also difficult to understand why the Council would not elect to include all constituents. Area 4A has not been included. Look at the last few years sportfishing growth in Dutch Harbor and look ahead to it's continued growth once restrictions are placed on the rest of the halibut sportfishermen. Nonguided sportfishermen have also not been included. What's the difference if a halibut is caught on a guided boat or a nonguided boat? It's all the same resource. When dividing the pie you would think they would include all that are involved.

These proposals can be considered when all sportfishermen are included and fully represented and all ports individual needs are evaluated and met.

Daniel Donich

ALAN?
w/ Jim. KLE

Quota Held by IFQ Crewmembers
By Area expressed in IFQ Pounds

	1997 IFQ Pounds	1998 Pounds	1999 Pounds
Area 2C	1,192,000	1,519,261	1,759,292
Percentage of TAC	11.9%	14.5%	16.8%
Area 3A	2,536,523	3,010,084	3,288,028
Percentage of TAC	10.1%	11.6%	13.3%

Number of Crewmembers Holding Q/S

	1997	1998	1999
	735	785	846

Alaskan resident crewmembers quota share increased from 68% in 1997 to 76.6% 1999.

Unalaska Native Fishermen's Assoc. —

Originally the Unalaska Native Fishermen's Association had no plans to present testimony on Halibut charter GHLs.

We can now see that decisions made now regarding the problems in the more populated areas of our state will potentially have a very large impact on the subsistence, sport, and commercial fisheries in our area.

We urge you to consider the following:

- Charter operators must share in conservation responsibilities.
- Wherever possible regional solutions should be achieved through a LAMP process.
- Super exclusive registration should be considered as a tool to prevent the inevitable speculative flood of operators into our area.

Thank you

Bob Stone

UNFA

Gale K. Vick

dba GKV & Sons / GKV & Associates

P.O. Box 220221, Anchorage, Alaska 99522-0221

PH: 907-248-4264 FAX: 907-248-4303

e-mail: gkvsons@alaska.net

Representing: The Afognak Native Corporation, Koniag, Inc., Kodiak Native Tourism Association, Kodiak Area Native Association and the Gulf of Alaska Coastal Communities Coalition

**Testimony to the
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
Regarding HALIBUT CHARTERBOAT MANAGEMENT**

February 9, 2000

Mr. Chairman and Members of the Council:

My name is Gale Vick. I am speaking today on behalf of the six rural communities of Kodiak Island, Afognak Native Corporation, Koniag, Inc., the Kodiak Native Tourism Association and the Gulf of Alaska Coastal Communities Coalition. Our membership includes commercial fishermen, lodge owners, charter operators, subsistence users, and guided and non-guided sports users in IPHC areas 3A, 3B and 2C. We have many stakeholders with varying concerns in the halibut charterboat issue.

First, I want to make it very clear that we have supported the implementation of a GHL and we have consistently pledged our willingness to implement management measures.

Second, we oppose a moratorium as stated for Kodiak Island because:

- (A) the proposed moratorium excludes more than 95% of the current halibut charter operators in Kodiak Island's rural communities, consequently inhibiting the growth of tourism for these communities and eliminating or restricting existing resource related jobs.
- (B) it is improbable that a moratorium alone will keep the halibut charter fishery within the GHL
- (C) the Kodiak halibut charterboat fishery has very little impact on the catches in 3A.

The AP is recommending Option 3¹ of the EA/RIR Analysis for which I have compared to the following estimated number of charters actually operating in these communities.²

COMMUNITY	POPULATION ³	OPTION 3 ⁴	ACTUALLY OPERATING 1999
Port Lions	242	2	20 ⁵⁺
Ouzinkie	252	1	4+
Old Harbor	297	1	9+
Larsen Bay	127	0	14+
Karluk	48	Not Listed	5+
Akhiok	109	(in 3B, not applicable)	
TOTAL RURAL	1075	4	52
Kodiak City	6774	25	50+

On Kodiak Island, under Option 3, you will limit the total number of operators Island wide to 29. Moreover, in the six rural communities, this option only gives 4 licenses for the six rural communities, which are currently at about 50 operators. This immediately eliminates 95% of the existing halibut charter operators in Kodiak's rural communities.

This is not a "sudden" proliferation of charters in the rural communities. This is the result of years of lodge development or of changing operators. These are jobs associated with locally owned lodges or small guiding operations. These jobs represent a primary source of local income. And, the actual halibut removals from these operators is minute.

The 1998 ADF&G logbook report indicates Kodiak Island had a total of 7,047 clients with a total of 1,782 halibut removals compared to 76,307 for Cook Inlet⁶ for a total halibut harvest of 131,413. At an average weight of 23# per catch in 3A, that would be less than 41,000# taken out of Kodiak compared to 3,022,499# out of Cook Inlet. Clearly, with a geographical area of approximately one-third of IPHC Area 3A and less than 5%⁷ of the overall Area 3A catch, Kodiak is not in need of a moratorium. Further, the Logbook summary for 1999 suggests a drop in overall Kodiak halibut harvest.

¹ From the December 1999 Council recommendations

² In the January 2000 EA/RIR DRAFT, page 143 describes the number of charter operations per community and how they might be impacted by the four options recommended in the December Council

³ As Indicated in the November 2nd 1999 ISER Gulf of Alaska Overview Report

⁴ This describes the level of participation that the analysis defined and the level that the AP is forwarding

⁵ Including Raspberry and Afognak Islands, etc.

⁶ West Cook Inlet, plus Kenai Peninsula both East and West of Gore Point

⁷ Based on p.15 of the 1998 ADF&G Logbook Summary, with a total 3A removal of 154,904 fish and a Kodiak removal of 8,751 fish

Kodiak communities are isolated and struggling to develop economic opportunities through tourism. Tourism in all these communities is dependent on halibut harvest.

Building a charter operation is NOT the same as fishing commercially. As a charter operator, you cannot fish (and therefore have logbook entries) until you have clients, and you cannot get clients until you have developed your infrastructure and done your marketing. In remote areas that are costly to get to, this is a lot more challenging. Therefore, the lag time in implementing a charter or lodge operation and actually starting to fish with clients, can be as much as three years or much more.

And, maybe most important, locally owned lodges may use different local operators as they are available, meaning not all operators will be operating at the same time nor maybe even in the same season. This is a good way to "share the wealth" locally as well as to provide flexibility.

This is why most of the existing charter operators in these communities do not qualify under any of the current moratorium options.

Entire economic infrastructures are built around these local lodge operations; obviously, these lodges cannot offer halibut as part of their package deal, they will lose clients. (For example, Sitkalidak Lodge in Old Harbor employs in excess of 20 people from their community and encourages spill over clients to utilize local bed and breakfast operations.)

I also suggest that this same scenario exists in many small isolated communities around 3A and 2C, from Kasaan to Yakutat to Tatitlek to Chenega Bay.

Point B: Why won't the moratorium necessarily help the Council in reaching the GHL?

A moratorium limits existing operators but not the number of clients and not the impact on the resource. To manage a GHL, other management tools are still necessary. Conversely, other management tools can manage the GHL without a moratorium.

Overcapitalized areas facing near-shore depletion issues should definitely have the option for a moratorium. We are not opposing a moratorium for other areas of 3A. We are not even opposing a potential moratorium for Kodiak Island. We are just opposing it for this particular scenario because of the tremendous hardship it creates for our rural communities which are struggling for economic opportunity. If we take away the halibut harvest component for a lodge operation, we are basically making that operation non-competitive with other areas, thereby putting their entire operation at risk.

We really need some room here!

In addition, as we go forward with a potential IFQ program for charters, the issue of moratorium will not only be moot, but it may actually complicate an IFQ plan.

We are suggesting two alternatives to an Area-wide moratorium that will be in the better interests of the Council in management of a GHL.

OPTION ONE (our preferred option, and consistent with our position over the last two years)

1. Apply Area-wide GHL
2. Use LAMP process to recommend appropriate moratoria
3. Use LAMP process for the application of GHL management tools, with a default Area-wide management tool if LAMP management does not show the required reduction
4. Go forward with an analysis of IFQs for charters

This option stops the increase in harvest removals. It encourages public participation other than just from those who will benefit by a moratorium. It allows the public process to work with GHL management tools. And it encourages an analysis of the IFQs.

If the Council believes that the immediate implementation of a moratorium is necessary, we would suggest the following:

OPTION TWO

1. Apply Area-wide GHJ
2. Exempt Kodiak Island (as represented by ADF&G Area K⁹) from a IPHC 3A moratorium
3. Create super-exclusive registration for Area K
4. Use LAMP process for potential Area K moratorium
5. Use LAMP process for the application of GHJ management tools
6. Go forward with IFQ analysis

If the Council is unwilling to exempt Kodiak (Area K) from an Area 3A moratorium, then we would suggest this sub-option:

Consider Area K moratorium qualifying date as 2004 ~~2004~~

This option stops the increase in harvest removals. It protects Kodiak Island from the negative impacts of an Area-wide moratorium. It encourages a public process through the LAMPs and it provides for a process for IFQ analysis.

The AP, in its discussion, suggested that the LAMP process could be used to modify or eliminate a moratorium. We disagree. (1) It is logistically difficult for the the LAMP process to work back through the Council process to modify or change a Council imposed moratorium. (2) A proposed moratorium is an economic franchise to a closed class. Once a moratorium is in place, achieving consensus to change or reverse it will not occur. The Local Area Management Plan process assumes community consensus. We will not find consensus through a LAMP when a closed class of charter boat participants will have an economic advantage to protect. *Creating a moratorium first and then trying to reverse through a LAMP process will simply poison the LAMP process for Kodiak Island. This is also likely to inhibit consensus on a potential IFQ proposal.*

⁹ Area K is all waters south of a line extending east from Cape Douglas (58 51.10' N. lat) West of 150 W long, North of 55 30.00' N. lat., and east of a line extending south from the southern entrance of Imuya Bay near Kilokak rocks (156 20.22' W long.) The waters immediately north of Shuyak Island would be included but the waters immediately adjacent to the Barren Islands could be considered "common (shared) grounds." Area K is the designated boundary for two Kodiak Island LAMP proposals currently before the Board of Fish (the Kodiak Native Tourism Association and the Kodiak ADF&G Advisory Council,) as well as the Kodiak Association of Charter Operators (KACO.)

I have attached copies of two letters written by current charter operators and lodge owners in Port Lions. These letters represent some of the many individual situations that each of our community members are facing.

In summary, as you consider the very real economic needs of small rural communities, we would ask that

Impose a GHL Area-wide
Do NOT apply an Area-wide moratorium
Provide for the application of management tools within
the LAMP process, including moratoria
Go forward with an IFQ analysis

Thank you for your time and consideration.

Whale Pass Lodge

P.O. Box 32 - Port Lions, Alaska 99680

Phone 1-800-4-KODIAK

bob@whalepasslodge.com

February 02, 2000


To whom it may concern

This is in concern for the proposal cap on sport fishing for halibut I personally can say your I.F.Q program did not work with my family we watched a way of life and quality of life leave our community because of the I.F.Q Program This way of life will not return ,now it woudn,t matter to someone who choses to live in a larger community such as Anchorage or Fairbanks were thier are more employment prospects . But here in the coastal communities of Alaska it was devistating the halibut opening would always come at a very good time (in the spring) when money was tight. since we here on Kodiak dont have a crab fishery any longer ,because of the over fishing and no pot limits and no area restictions . This can not be blamed on the fisherman it was do to bad management by the Alaska Department of Fish and Game

What I,m getting at here is take a long hard look at this program and see who this is going to effect. Realize how few employment opportunities there are left for people in rural coastal Alaska .

I myself am one that lost out on the I.F.Q Program. As a skipper of some one elses boat, well you no the story, just like so many others, I lost out and my crew lost out too. I ran a 65 foot vessel during those halibut opennings, the same boat for a three year period and other vessels over the years. I had been in the halibut fishery since the mid seventies and I also ran the same boats for long lining cod, and salmon tendering. The same crew fished with me and tendered salmon when the right to fish halibut was taken away these young men lost out on part of there income. Then it came time for me to also get out we could not make it on just what I was making on salmon tendering and long line cod fishing. I had to start a new business. We had some property and some money saved, so we built Whale Pass Lodge never did I think we would be cut out of business because of the federal laws again.

This is the last opportunity for people young and old to start a business in coastal rural Alaska , so take a long hard look at what can be done to help coastal rural ALASKANS!!!! The track record thus far is not to good once again think on this one real hard


Bob May

Rick Lauber, Chairman
National Pacific Marine Fisheries Council

Melvin Squartsoff
P.O. Box 70
Port Lions, AK 99550

February 4, 2000

Dear Chairman Lauber,

My name is Melvin Squartsoff. I've been a fisherman for my whole life. I got my start about thirty-six years ago aboard my Dad's purse seiner as a seven year old deckhand/plugerman. Ten years later after graduating from High School at seventeen, I bought my first skiff and began longlining for halibut on my own. My Dad also retired about that time and put me in charge of our set net site. I've crewed on boats for just about every fishery over the years, and gradually built my own fishing business up. There was a time, not so long ago, when we used to be able to make a living fishing year round. January, February, March was tanner crab. April, May, June was halibut or herring. July, August, September was salmon and October, November and December was king crab. Of course there was some overlap of the seasons, but it was possible to work year around and make a living.

Not anymore. You can't catch enough king, tanner or dungeness crab in our area to make a meal. Gone, mostly from over harvesting. Our Bay hasn't opened for herring for years, no one knows why the younger, harvestable stocks are gone. IFQ's killed halibut fishing in the villages. The big boats made sure us little guys didn't get to big a piece of that pie. Salmon is all that's left. Very few of us are fortunate enough to have limited entry permits. Come to think of it, remember in the early eighties when halibut was going to go limited entry? We had like about a five year period from 1978-1983 (approx.) to qualify. The big boats managed to scuttle that plan. Most of the permits would have gone to us little guys, the local skiff fisherman! We were the ones fishing before the halibut biomass built up to the big numbers that caused them to jump aboard! Well, they played their cards right, we didn't. They have the halibut, we don't. Congratulations, you have a bunch of rich IFQ owners.

I sold my 31' longline boat last year. I fished it for more than ten years, longlining halibut, gillnetting herring, and pot fishing tanner and dungeness crab. I sold it cheap to a local guy, just starting out. He wants to convert it to a charter boat. I've had my USCG 25 ton Masters License since May of 1998. In February 1999, I made a down payment on a nice 25' aluminum boat with a 200 hp diesel engine and started Kizhuyak Charters with the C/V Kekur Point. Now we're threatened with IFQ's for the halibut charter boats, or some sort of moratorium to limit the number of charter boats. It's the last thing we have left. Almost all of us locals from the villages will be shut out again. I ask that keep us in mind and consider implementing the Local Area Management Plan. We will make it work.

We're fisherman, we belong on the sea, don't take away one of our last opportunities to make a living from the sea.

Thank you for your time.

Sincerely,



Melvin Squartsoff

AGENDA C-1
FEBRUARY 2000
SUPPLEMENTAL

**COMMENTS RECEIVED ON
HALIBUT CHARTER GHL & MANAGEMENT MEASURES
SINCE DECEMBER 1999 MEETING**

RECEIVED

DEC 16 1999

North Pacific Fishery Management Council
Richard Lauber, Council Chairman

December 15, 1999
N.P.F.M.C

Dear Mr. Lauber and Council:

This letter is concerning the current proposal to reduce the daily halibut bag limit from two fish to one fish for those anglers who fish on charter boats.

I am an Alaska resident and registered, licensed, and active charter boat owner. I am in full support of the proposed bag reduction for several reasons. First, self regulation or control will not work for our growing industry, because I see so many abuses of the resource right now with the goal to catch and keep every fish landed and the pressure to do so is so great as " what can you do because the client is paying you ? " and if you don't the client will easily find another charter captain next time who will look the other way. The big brag now is not how many halibut did one catch during the trip to Alaska; it is "how many pounds did you bring back ? ". I assume it is your agency's responsibility to assist in protecting and conserving halibut stocks. Maybe reducing the bag limit will help.

Next, make a decision now! Others in the charter boat industry are so hell bent in catching up the quota that by the time the powers that make policies finally do something the fish stocks are in trouble and the result is we have problems like we do with King salmon allocation in Alaska, and everyone suffers. Cuts are easier to live with if they are up front and known ahead of time.

Finally, as a suggestion, maybe your agency needs to look at a size limit as well. I feel that one fish no larger than 48 inches in length and no smaller than 32 inches in length is good and a keeper. Remember when it comes down to enforcement it is a lot easier to cry foul when someone checks in with 6 wet lock boxes of halibut reportedly caught in 1 day. However this is Alaska and everyone can catch a 500 hundred pound halibut everyday.

Good luck,

Dan Lakip
Eureka Charters
8913 Duran Street
Juneau, Alaska 99801
Alaska Department of Fish and Game Fishing Guide number G -7272
Alaska Business License number 259911 exp.12/31/00

Letter on Halibut Issue

Share Halibut Responsibility

The facts become very diluted depending on who's view you want to look at before the North Pacific Fisheries Management Council.

1. As far as allocations to the guided halibut charters I would say that for the past seven years halibut limits have been 2 per person and have not gone up when the commercial fleet has had a 300% increase. If we had been given a 300% increase during this time our individual limit would be at 8 fish per person. Now they want to set limits on the guided sport fisherman and anglers to compensate for their greediness over the past seven years. Why has the commercial boats been given such latitude. They have had a control of this commission since it's inception. Also our esteemed governor has said we don't need anglers or guided halibut operators on the commission to protect the general publics interest.
2. As far as Ninitchik experiencing a near shore depletion, how can any one say it is from the guided sport fisherman when the average run for a charter operator being 18 miles out toward the other side. More than likely the reason for the near shore depletion is the average angler finding the launches at Ninilchik more inviting and closer to their home. On an average day on the weekend more than a 150 private boats are launched from there. Of these maybe 40 are guided charters.
3. I have heard some long time guided halibut operators at varying location, state that they can't get as many clients as they did before.. maybe its because they aren't providing great service. Not because the halibut are gone. The halibut angler is looking for their Alaska adventure.
4. I agree that everyone who makes money off the resource should share equally. So since the commercial rapist have been getting my share for the past 7 years and my quota has not gone up. The average angler should get 6 - 8 fish for the next seven years and the commercial fishermen should drop to the level of seven years ago.
5. As far as this issue not involving unguided sport nor subsistence fishermen; Well that's what they say NOW. But when you as a sport fisherman or subsistence fisherman take your boat out with your buddies and they help pay for gas you will be called a fisherman who makes money off the resource and will follow the commercial fisherman's MANDATE.
6. There are some who would take the free enterprise system from us to pad there own pockets. Let's put a moratorium on how many charter operators there are. Then those that are lucky enough to have a Guided Charter permit can Charge \$\$300. Angler on their boat. You really think this don't affect the sport fisherman THINK AGAIN.

Alderman Charters

RECEIVED
DEC 1 1983
N.P.F.M.C

12/6/99

RECEIVED
DEC 14 1999

Governor Knowles
Chairman Lauter

To whom it concerns;
In regards to the proposal to restructure the Alaska halibut fishery, put before the North Pacific Fisheries Management Council by the Alaska Department of Fish and Game. I strongly disapprove of the hypocritical stand taken by the department. If adopted this plan will greatly marginalize my own business, probably reduce the amount of raw fish tax coming in to the town I live in, and cause the state to have problems collecting loans they have made to commercial fishermen who depend on the fishery for part of their income.

I am a commercial fisherman from Pelican, Alaska. I have owned and operated a salmon troller since 1993. I have earned my living in the Alaska seafood business since 1984. I worked as a deckhand during the IFQ qualifying years and received no credit for my livelihood when the Restricted Access Management Plan was implemented. Since 1995 I have borrowed and invested a considerable amount of money to gain access to the halibut and sablefish IFQ fisheries. Most of these fish I sell in Pelican. The halibut shares I own are from areas 2C and 3A, the areas that would be affected by ADF&G's proposal. This amounts to about 9,000 lbs. (1999 weight) and cost around 80,000\$ to purchase. The weight fluctuates with the abundance of fish as calculated by the International Pacific Halibut Commission. They base their stock assessments on their own surveys and logbook data submitted by the commercial fleet.

Although the IFQ system did not initially include me, despite my previous role in harvesting the resource to earn a living, I agreed that it was a necessary change that needed to be made to the fishery in order preserve the fish stocks and better serve the consumer. The system would restrict the overcapitalization of the fleet and hold the participants more accountable to the overall health of the stocks, much like a shareholder in a business. This being the case I decided to buy my way back into the fishery with money I had earned salmon trolling and deckhanding on longliners. Having obtained a state loan for my vessel and troll permit and a bank loan from The National Bank of Alaska I pursued an aggressive eleven month a year work schedule allowing one month in the spring to perform maintenance projects on my boat. Despite some of the low fish prices and political problems in the troll fishery I have remained viable, making all my payments on schedule and maintaining my boat. Now this proposal by ADF&G to allow an unrestricted, overcapitalized, commercial user group (ie. the guided sport fishery) room for continued expansion with almost no accountability for stock conservation may cause all that to change.

The State of Alaska just spent four years successfully arguing the merits of an abundance based management system for king salmon at the Pacific Salmon Treaty. How can anyone at ADF&G put fourth a proposal that treats Alaskan halibut in the same foolish manner that the Canadians treated their sport caught king salmon. As you know the sloppy accounting of the sport harvest in the Canadian king salmon fishery has played a significant role in its decline. This is very unprofessional on the part of ADF&G. There is a lack of consistency in the application of their professed policies. They will most likely have to address this fact at forums other than the NPFMC.

When the longline fleet was in its unrestricted growth phase they were not rewarded with longer openers and larger quotas to account for their growth. Quite the opposite, they were cajoled into accepting a limited entry scheme with shorter openers and smaller quotas. After the implementation of the IFQ program, which eliminated over

thirty percent of the previous participants, the remainder received a percent based on the up and down fluctuations of stock abundance. Their initial allocations were not greater than their average annual production but approximately two thirds of their average annual production. If they wanted more or people such as myself wished to regain access to the fishery for our own vessels we had to buy our way-in. This is expensive yet workable if one does not have to account for another unrestrained commercial user group, with little motivation for conservation.

The proper response to the overcapitalization of the commercial charter fleet is the same as it was for the longline fleet. Cap their quota at about ninety percent of their best year. If they want stability they'll quickly figure out that they need a limited entry scheme for their fleet, possibly eliminating more recent participants. If they still need to increase their production they can buy IFQ's like I did. Furthermore a minimum size limit of thirty-two inches should be established for all halibut harvest.

If this is not done and the current ADF&G halibut management proposal to the NPFMC is adopted, people like myself who have already had to accept a much more austere management plan with its accompanying financial hurdles. People whose permit and vessel values have already been marginalized enough, due to the irresponsible lack of restriction on the commercial charter fleet, may start having trouble repaying our loans to the State and other lending institutions. Furthermore the town I live in, Pelican, which is struggling to regain its economic viability (and showing a glimmer of hope after successfully buying both troll and longline fish this past summer) will be further stymied as there will be little or no halibut landed on years of low abundance.

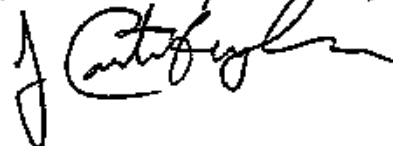
If the ADF&G halibut proposal is adopted by the NPFMC the State of Alaska will appear as hypocritical and inconsistent in the arena of international debate on fisheries management. Further economic instability will be inflicted on some of the communities that have had to adapt to the changes brought about by the IFQ system. There will be increased defaults on commercial fishing loans that the State will have to deal with. The state will lose market shares of halibut to farmed fish at a critical time when they still assert dominance in that area. The fish eating consumer that desires a healthy, chemical free, wild seafood product will be denied access to the resource. Finally, the commercial charter fleet will continue to grow. ADF&G and the NPFMC will be forced to revisit this issue again like the unresponsive parents of a naughty child that has procrastinated at ones school work to the point at which all must attend a conference to discuss the consequences of a failing grade.

Sincerely,

James Carter Hughes

F.V. RADIO

Pelican, AK, 99832



Copies: Delegates
A1 F5

**CITY & BOROUGH OF YAKUTAT, ALASKA
RESOLUTION 99-24**

A RESOLUTION FOR THE CITY AND BOROUGH OF YAKUTAT SUPPORTING THE 1997 GUIDELINE HARVEST LEVEL ALREADY SET BY THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL, ALSO SUPPORTING AN ABUNDANCE BASED ALLOCATION AND NOT A FIXED NUMBER FOR ALL USERS OF HALIBUT.

WHEREAS, The history and culture of Yakutat is one of commercial and subsistence fishing, and

WHEREAS, In area 3A, 84 % of people who own IFQ's are Alaska residents, 87% of guided Halibut sport fish clients in Yakutat are non-residents, and

WHEREAS, The people of Yakutat are concerned with the rapid expansion of the guided Halibut sport fishery, and

WHEREAS, The substantial number of Halibut taken from Yakutat Bay and Ocean Cape by guided sport fish clientele (326,154) round weight 1999 pounds) has made it difficult for anyone to harvest fish in those areas, and

WHEREAS, Yakutat Commercial Fishermen have supported conservation by accepting low quotas when the biomass was low. The City and Borough of Yakutat as a whole agrees that all segments of the industry should share the profit and loss of the fishery. No segment of the industry should be immune to conservation, and

WHEREAS, A significant number people in the community are employed one way or another by Commercial Halibut fishing, and

WHEREAS, The vast majority of the money earned from the Commercial Halibut fishing stays in Yakutat, and

WHEREAS, The raw fish tax in FY 99 was 11.1% of our total City revenue, and

WHEREAS, The City and Borough of Yakutat acknowledges the social and economic importance of the Commercial Halibut fishery to our community and to the State of Alaska, and

WHEREAS, A significant number of community members hold IFQ's and have invested in IFQ's, and

WHEREAS, A reduction in the Commercial Halibut harvest would reduce individuals abilities to pay the incurred loans on their IFQ's and all other costs of living, and

NOW THEREFORE BE IT RESOLVED, that the City and Borough of Yakutat supports the 1997 Guideline Harvest Level already adopted by the North Pacific Management Council, and

FURTHER BE IT RESOLVED, that the City and Borough of Yakutat supports an abundance based allocation for guided sports halibut fishery, and

CITY & BOROUGH OF YAKUTAT, ALASKA


FURTHER BE IT RESOLVED, that the City and Borough of Yakutat urges the North Pacific Management Council to adopt effective slow down measures that keep the guided sport Halibut fishery within their allocations.

PASSED AND APPROVED THIS 20th DAY OF December, 1999.

CITY AND BOROUGH OF YAKUTAT




THOMAS W. MALONEY
Mayor


MONA SWANSON
Borough Clerk



SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

December 17, 1999

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

RECEIVED
DEC 21 1999
N.P.F.M.C

Dear Chairman Lauber:

The 490 member fishermen of Seafood Producers Cooperative strongly urge the NPFMC to stay with the original guideline harvest level for halibut that was set for the charter boat fleet in 1997. Any reallocation of the Alaska halibut resource away from the commercial fleet will have a major economic impact on our members, employees and the small communities in S.E. Alaska where they live and work.

We have been in the halibut business since 1944 when our cooperative was formed as the Halibut Producers Cooperative. Halibut processing currently represents 20% of our total production and 25% of our total revenues. As a business we have invested over \$9.8 million in our plant in Sitka, which relies heavily on halibut deliveries to support the cost of this facility. Our plant employs 130 seafood processing workers with an annual payroll of \$2.8 million. We pay taxes, lease fees and utilities of \$1.1 million each year, and our members who predominantly live in S.E Alaska spend an estimated \$4-5 million each year on fuel, groceries, fishing supplies and other services throughout the state. In addition to the investment our members have in the cooperative, many have also made a substantial investment buying halibut quota shares in order to keep their fishing activities economically viable. They have mortgaged homes, vessels, and taken out substantial bank loans just to stay in the fishery. These are not individuals who have the time and money to take a trip to Alaska and spend a few days fishing. They are hard working men and women who fish commercially for a living and contribute year round to the states' economy.

Your decision on this issue is critical to our fishermen, our employees, our business and the many S. E. Alaska communities we help support. We cannot afford to have another traditional fishery taken away and unfairly given to another user group. We appreciate your consideration and support.

Sincerely,


Barry S. Lester
President/CEO

PC: Governor Tony Knowles

Gary Dubuisson
13300 Alpine Drive
Anchorage, AK 99516

North Pacific Fishery Management Council
605 W. 4th Ave. Ste 306
Anchorage, AK 99501-2252

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

Re: Halibut Charterboat Management

Dear Mr. Lauder and the Council,

I preface this letter by stating that I do not own an oceangoing vessel and that all of my yearly halibut fishing is done via charterboat.

As a citizen of this State and an avid fisherman, I was appalled and insulted that NPFMC was proposing that bag limits for sportsmen be decreased to 1 fish daily. When presented in the proper format, it is blatantly easy to see that even other fishery's bycatch of halibut exceeds the sportsmen's take of halibut. While the limit quotas for commercial fisherman have increased fourfold over the past ten years, sport bag limits have remained stagnant. And now NPFMC has the audacity to suggest cutting bag limits of halibut from 2 down to 1 for the taxpaying, equal righted citizens of this State. As opposition, I propose that the commercial catch be decreased 10% and that sports bag limits be increased to 4 fish/day. If that is not sufficient, I also suggest that means to lessen bycatch be imposed, at total cost to the fishery, and another 2 fish a day could be added to the sports catch limit, and I would still not be at the commercial fishery quota level of 4X increase.

Based upon the best available information, the halibut fishery is a thriving, sustainable fishery. By making such a proposal, NPFMC has attempted to step over its bounds while stepping on the toes of numerous sportsfishers throughout the State (four in this household alone).

I have tried to follow the progress of NPFMC and often vocally supported your role, but you have lost your focus of managing the fisheries to that of managing solely for commercial fishermen, which I can no longer support.

Sincerely,


Gary M. Dubuisson

cc: Governor Tony Knowles, Lt. Governor Fran Ulmer,
Senator Frank Murkowski, Senator Ted Stevens, Representative Don Young,
Senator Sean Parnell, Rep. Con Bunde

A. W. BRINDLE
H. A. BRINDLE

PROCESSOR OF
CHOICE ALASKA SEAFOOD
SINCE 1912

Wards Cove Packing Company

PHONE (206) 323-3200

88 E. HAMLIN STREET
P.O. BOX C-5030
SEATTLE, WA 98105-0030

Day Fax (206) 323-9165

December 20, 1999

RECEIVED
DEC 27 1999

N.P.F.M.C

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

Dear Chairman Lauber,

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

As a processor, Wards Cove Packing purchases approximately 4 million pounds of halibut a year and sells it to hundreds of customers in the domestic United States and Europe. This equates to over 8 million servings of halibut in one year. Without a steady supply of commercially caught halibut at reasonable prices, most of our customers will not have access to this fine seafood. Halibut plays a prominent role in our market and is highly valued by our customers because of the consistent supply.

Since the inception of the Individual Fishing Quota program, we have been able to operate our plants in Alaska for a longer period of time; March through November. The sales of fresh halibut to the retail and food service sector has been a stable, growing business to our marketing strategy.

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

Sincerely,



Alec Brindle
President, Wards Cove Packing Co.

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



A Division of Wards Cove Packing Co.

December 20, 1999

RECEIVED

DEC 27 1999

N.P.F.M.C

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

Dear Chairman Lauber,

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

As a fresh sales group, Seafresh markets approximately 2 million pounds of fresh halibut and 2 million pounds of frozen halibut in a year. We sell primarily to hundreds of customers in the domestic United States but have a handful of good clients in Europe. This equates to over 8 million servings of halibut in one year. Without a steady supply of commercially caught halibut at reasonable prices, most of our customers will not have access to this fine seafood. Halibut plays a prominent role in our market and is highly valued by our customers.

The sales of fresh halibut to the retail and food service sector has been a stable, growing business to our marketing strategy. Because of the consistent supply we have been able to promote and sustain demand for halibut by the customer. Through years of education and encouragement by the Alaskan seafood community, halibut demands a place on the restaurant menu and kitchen tables of America.

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

Sincerely,

Martin J. Bunes
Vice President, Seafresh

Cc: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK. 99811-0001

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

RECEIVED
12/23/1999
DEC 28 1999
N.P.F.M.C

Dear Mr. Lauber,

I have been sport fishing for halibut, primarily in the Cook Inlet and Resurrection Bay for 13 years. Even in that short time, I have seen a decline in the average size of the fish we catch and the increased distance from port it takes to get consistently to bigger fish. In my opinion, the primary reasons for this are: 1) the ordinary commercial harvest plus bycatch, and 2) the all out quest for the taking of only the biggest fish by many charter boat operators to satisfy public demand. (This is indicated by almost every town in Alaska with halibut charter boats having its own derby for biggest fish, eg, Homer, Nipilchik, Seward, et al), and, 3) many so called sport fishermen, on charter or private boats, fish many days during the season, take only the biggest fish they catch, and package them up for barter or outright "commercial sale" back home. The selective harvest of this fishery's biggest fish has a depletion effect on the entire fishery because they are the female egg layers that are necessary to sustain it.


As a result, I would propose some new conservation rules for halibut sport fishing that, once accepted, would provide for a sustained sport fishery that would provide no threat to the commercial fishery and, in fact, would probably enhance it. As you may know, there is an annual limit of 5 king salmon per person in the Cook Inlet and the Kenai Peninsula streams feeding it (and one/day and 2/year from the Kenai River). I believe we need a similar annual limit on halibut but would suggest 10 - 15 total per season per fisherman with only one per day and two per season allowed to be kept over 80 pounds. There seems to be wide agreement that halibut over about 80 pounds are spawning females and, to protect these vital seeds of the fishery, we should attempt to conserve them as much as possible. Also, most agree that 20-70 pound fish are better eating anyway and, for those that want derbies, could put the prize(s) at closest to 70 pounds (desirable) or keep the biggest fish derby within the new rules. If adopted into regulation, many people would try to circumvent these rules. To inhibit that possibility, sport fishing licenses and resident harvest cards can be printed with punch out slots for halibut and king salmon caught and, when the license is completely punched for that species, the license owner stops fishing for that species that year. There will be a few determined lawbreakers who will "conveniently lose" their licenses and try to obtain another at reduced cost so they can continue to fish. Except for those who fish from private boats, the charter industry can easily keep an annual log of clients in their computers to assist Fish and Game find those who have acquired more than one license per season and how many fish they caught on a halibut charter. I would think that charter boat operators would choose this approach to a boat cap or a one fish per day limit on their industry.

Having said all that (which I think is reasonable), I vehemently protest the NPFMC being comprised primarily of commercial fishers and attempting to regulate their own industry and the sport fishery as well. First of all, the fish in the sea are a public resource and not

owned solely by commercial fishers at all! So where do you have a basis in law for attempting to regulate a sport fishery? And second, there has not been in history a single commercial fishery worldwide which has successfully regulated itself, once the resource began to decline, eg, whales, sardines, anchovies, swordfish, cod, et al, ad nauseum. And neither the North Pacific halibut nor the pollock fisheries are good examples to the contrary. You may try to make that claim for halibut but the truth is you don't know where the halibut are 7-8 months each year—thank God— or you would be fishing for them year around too!! And the pollock industry is already in deep trouble but nobody will admit it --yet. This latter fact is provable by your own data, published in ADN, August, 1997. (Look at the decline in total estimated pollock resource from 1985 to 1997, with a purported level harvest rate over the same period. It doesn't take a rocket scientist to see the resource IS NOT renewing itself!?) And the commercial halibut bycatch (waste) is greater than the catch of the entire halibut charter sportfishing industry!? I'd hate to have that nerve in a tooth! In fact, the halibut bycatch should be made a part of the catch quota by weight to provide an incentive to reduce that bycatch each year. I also suggest the NPFMC become a little more introspective and start conservation programs (bycatch reduction would be one) inside the commercial halibut fishery before attempting to regulate any small competitor, just to retain any regulatory credibility you may think you have left.

I suggested in this letter some conservation suggestions for the halibut industry. If you feel any of these conservation suggestions have merit, please discuss them or some variation with both the NPFMC and the charter boat folks. Then, if any of these suggestions is adopted for the charter boat people, I would also ask why doesn't the NPFMC and the commercial industry follow suit? I hope you don't think this is a rhetorical question and I hope the goal is a sustainable fishery for all parties.

Sincerely,



Richard Hahn

P.O. Box 2754

Soldotna, AK 99669

907-262-8575

RECEIVED
DEC 26 1999

Monday, December 6

N.P.F.M.C

Dear Sir,

Change is inevitable. The changes proposed concerning fixed-poundage halibut allocations for charter companies would be a disaster for me, a small-scale fishing operation, the kind that have helped sustain coastal communities for decades.

Believing in the IFQ system, I've invested a lot of money, buying more shares, trying to grow a business. Just the threat of re-allocation of the resource has depressed the value of those of those shares already. Increased harvests in other areas depress our value even further.

After years of study and consideration, a system of allocation was adopted that works. It seems so clear that those harvesting this resource for money should share based on it's abundance. If the charter companies grow and need to harvest more fish then let them do it the same way we do- buy more shares! They have boats and crews and hooks and gaffs and make money doing it. If that isn't commercial fishing then I don't know what is.

The basic system is already in place. It would allow each charter company to grow and share in the stewardship of the resource as the should. It would create a gradual transition and lessen the negative impact on the vast infrastructure that has benifited from the harvest of halibut for a hundred years. It just might create a partnership and cooperation between longliners and the charter fleet instead of animosity and resentment.

No fishery can be managed with fixed poundage in the equation. No way.

Sincerely,



Chris Fawton
11311 Whistle Lake Rd
Anacortes, WA 98221-4305

Wed Jan 5/2000

Bertonen?

I just read a scary
article in the Anchorage
paper.

If you don't like the limit
on Nalchut for sport fishermen
get out of town.

Don't mess with the ones
financially ~~beating~~
eventually someone is going
to get laid-off, understood.

Joseph Verrier
JOSEPH VERRIER
HC 02 BOX 7677
PALMER, AK 99645

RECEIVED

JAN 05 2000

N.P.F.M.C

Keith Peters
73 Mt. McDonald Rd.
Port Angeles, WA 98363

January 1, 2000

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

RECEIVED
JAN 03 2000
N.P.F.M.C.

Dear Mr. Lauber:

I am a full time fisherman who primarily fishes halibut. I purchased three fourths of the quota I own. My wife and two sons fish with me. My sons depend on their crewshares to pay for college.

I urge you to implement a guideline harvest level for the GUIDED SPORT INDUSTRY of 100% of their 1995 harvest and that it be abundance based in the future.

Sir, I worked and saved to be able to purchase IFQs in order to have a job. Now my quota is being reallocated to the guided sport industry. As I recall the Magnuson Act specified that fishery allocation will be fair and equitable. Managing the guided sport industry at 100% of their 1995 harvest and abundance based is more than fair for that industry.

The guided sport industry can continue growing as individual businesses by consolidating with smaller less profitable businesses. Or allow guided sport industry more growth in halibut management areas 3B, 4A and 4B where their catch now is a fraction of a percentage.

Thank you for your time to consider my viewpoint.

Respectfully,

Keith Peters

Murray R Hayes
224 Grant St
Port Townsend WA 98368

1/3/00

RECEIVED

JAN 8 2000

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

N.P.F.M.C

Dear Rick Lauber,

As commercial fisherman that trolls and halibut fishes in Southeast Alaska I feel it is necessary to comment on a proposal to allocate the charter boat industry 125% of their 1998 catch on a permanent basis with no reductions for stock fluctuations. While this would be great for that group it could be quite detrimental to income I need to support my family in years of low abundance.

I have made my living fishing in beautiful Southeast Alaska for 25 years and have raised two children and have 2 more to go. Halibut accounts for about 1/3 of my fishing income and salmon and a small amount of blackcod the rest. I also work in the winter to make ends meet.

I feel 125% of the charter fleets 1998 landing is too high in the first place. Both charter log book data and statewide harvest data for 1998 show a doubling of catch from 1997 to 1998 in area 2C. Secondly, in fairness, all users should share the burden as one group should not be above the others when it comes to bearing the cost of conservation.

I hope you will consider my letter regarding this important issue.

Sincerely,



Murray R Hayes

RECEIVED
JAN 6 - 2000
N.P.F.M.C.

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

Dear Chairman Lauber:

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides an allocation based on 125% of the 1995 charter fleet's harvest. A set allocation for one commercial group - charter boats - while the other commercial group - long liners - absorb all reductions in quota, is a sure formula for the demise of the commercial halibut long line fleet.

The IFQ program as implemented by the council has resulted in an orderly fishery. The ability to buy and sell quota has resulted in substantial investments by many of the participants in the halibut IFQ fishery. A council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to the fleet, and in many cases, the loss of a family business.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

Sincerely,

After we worked & sacrificed together
to rebuild the halibut stocks - you plan
a re-allocation scheme to the new charter fleet,
are we surprised that NPFMC is any less
corrupt than the rest of the Fed. government?
Political graft + "money under the table",
are alive & well -

David A. Peters



KENAI RIVER SPORTFISHING LODGE

January 4, 2000

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

RECEIVED
JAN 04 2000
N.P.F.M.C.

As human lives are increasingly sheltered from the world around them, they seek out outdoor recreational pursuits to fill the void. Sportfishing is about recreation in the outdoor world and is becoming increasingly popular. Recreational anglers understand that conservation management is vital to the enjoyment of their pursuit. They also feel strongly that fair allocation of fishery resources between user groups is not taking place.

As the demand for sportfishing services has increased, a healthy charter industry has developed along with the supporting services of hotels, lodges, tackle stores, etc. This industry supports and greatly benefits the economy in Alaska. It will continue to do so as long as sport fishermen have fair access to the harvestable fish resources.

We do not support the adoption of a "guideline harvest level" for Alaska's guided halibut sportfishery at this time. The halibut sport catch is a very small harvest when compared to the commercial catch. Given the present abundance of halibut, it is very unfair to impose restrictions on sportfishing harvest levels.

As the abundance of halibut rises and falls, so should the level of harvest. The issue here is how the harvest level should be allocated. In the past, as abundance increased, so did commercial harvest levels. Yet sportfishing limits remained the same. As abundance decreases, sport fishermen are expected to shoulder reduced limits. As it stands, sport fishermen never share the gains, only the losses. **This is not fair.**

Sport fishermen have accepted the present two fish limits and the charter industry has grown around it. We can accept this limit for the future. We cannot accept a further reduction. It is time for a comprehensive management plan for all Alaska's halibut fisheries with fair representation by and for sport users.

Sincerely,

Fred Telleen
Fishing Program Director

Alaska Wildland Adventures Winter Office - P.O. Box 389 Girdwood, AK 99587
Toll Free - 800-478-4100 Fax 907-783-2130
(e-mail) info@alaskasportfish.com

To: Richard Lauber, Chairman NPFMC

Robert D. Schell
From: Robert D. Schell, F/V Alice Faye and Board Chairman, Seafood Pro. **NPF.M.C.**

Subject: Halibut Charter GHL, February 2000 Council Agenda

Date: January 4, 2000

I am writing in support of Alternate 2, Option 2 based on the 1995 GHL.

It is very difficult for me to comprehend the proposed action of a set GHL for any segment of the industry, whether it be sport, subsistence, IFQ, or charter. The state of Alaska has always advocated an abundance based management approach to the state's resources and the council has certainly done the same. In September of 1999, Governor Knowles met with a group of fishermen and interested parties in Sitka. One of his first statements when asked about the ADFG proposal of a set allocation for the charter fleet was that he always advocated the states position of "share the gain share the pain". His own sports fish division apparently still has not gotten the word from their boss. This is hard to believe as Dave Benton and Frank Rue were in the same room.

I bought into the IFQ fishery at \$11.25 a pound and have seen that per pound value drop on the market place to the \$8.00-\$8.50 range. This is a 31 to 24 per cent drop in the value of my investment if I were to sell today. IPHC staff is recommending a 20% reduction in the 2C halibut quota for the year 2000. I made my investment in the halibut fishery knowing that these two aspects of the halibut fishery were volatile. I did not know that there was the possibility of another commercial user group with no harvest investment and no lack of appetite for natural resources that could close me out of the halibut fishery.

Although my investment may be substantial as to my quota purchase, I am old enough to have made that purchase out of savings. It is the young guys and gals that have made these same types of investments through home and boat mortgages that would be the real losers in a direct poundage allocation to the charter fleet. We all know that IPHC data shows a downward trend in stocks in 2C and 3A. A couple of more years that see the same reductions as recommended for 2000 and a direct allocation to the commercial charter fleet and there will be a whole lot of small businesses on the road to bankruptcy.

As chairman of Seafood Producers Cooperative, I know the value to our members of the commercial longline fleets halibut production. This value extends to other commercial fisheries as well as to the local economy of Sitka and other Alaskan ports where there are processing agreements between SPC and other fish companies. Just as halibut is a piece of the pie for individual fishermen, halibut is a piece of the pie for our cooperative. When one piece of the pie is missing, the rest of the pie sloughs and becomes unmarketable. The fish business is the same. Too many pieces of the pie disappearing and/or a lack of filling leaves the crust!

I have commercial and sport fish data going back to 1987. In 1987 the sport catch for area 2C was 780,000 pounds. The commercial catch was 10,685,000- the sport catch was .073% of the commercial catch. The projected catch for the year 2000 using the IPHC preliminary statistics is 1,830,000 pounds for the sports catch and 8,400,000 for the commercial catch-the sports catch is estimated to be .218 % of the commercial catch. This is an increase in catch, almost all of which is attributed to the commercial charter fleet, of 1,050,000 pounds. During this same time, the commercial catch has declined by 2,465,000 pounds. Since all commercial IFQ calculations of quota are based on whats left after all other deductions are taken, the "share the gain share the pain" scenario is mystifying to say the least.

As it presently stands the council has the role of setting all deductions from the halibut quota- sport, subsistence, bycatch. Its status quo or increases for all users except for the one fishery that you have to buy your way into and starting next year, a fishery that will be assessed to manage itself. I do not see much equity here.

The big vote is coming up in February. Please study the facts and vote on the historical and biological facets of the halibut fishery and leave the politics at home when you go to Anchorage.

Thanks for your time.

Richard S. Bartolowits

January 1, 2000

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



Dear Mr. Lauber:

I am writing in regards to your upcoming decisions in the North Pacific Fishery Management Council. I write from multiple perspectives: I have lived in Alaska all my life (my parents homesteaded here in 1948), I have sport fished for halibut in Cook Inlet for 25 years, I have been a commercial fisherman, I am currently a sport fishing guide operating out of Deep Creek.

I understand the Council's concern about increased fishing pressure on the halibut stock. However, I am disturbed by some of the proposed methods for "protecting" the halibut. The two proposals I am hearing the most about are: 1) putting a cap on the guided halibut sport fishery, and 2) lowering the limit on sport caught halibut from two fish per day to one. Both proposals would effectively destroy a large percentage of the guided halibut sport fishery. Additionally, Alaska's crucial tourist industry would be negatively impacted.

In the face of recent increases in commercial quotas for halibut, the above proposals are unfounded and unfair. While commercial harvesters have enjoyed increased quotas as halibut stocks increased, the sport fishing limit remained constant at two fish per day. That limit should not change.

Here are some options for limiting the guided sport catch that I would support:

1. Eliminate boat "crew" limits. Many boats catch the two fish limit for the captain and crew every day. For six-pack boats following this practice, crew limits can account for up to 25% (4 out of 16 fish) of the boats take.
2. Institute size gap limits. I have been encouraging my clients to release large halibut for many years. Many of my clients go fishing with the idea of releasing 100 pound plus halibut. Impose a size limit minimum of 32" (commercial keeper) and a maximum of 60" which would protect those 100+ pound females. To

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January 1, 2000

Page 2

mollify the true trophy fisherman, a fisherman could be allowed one fish over 82" (roughly 300 pounds) in their lifetime.

These two proposals would have limited impact on the guided sport halibut industry. They would, however, have a significant impact on the guided sport catch.

3. Limit the number of hours per day a guided boat is allowed to fish. Effectively, creating a one trip per boat, per day limit.
4. Limit the number of guide boats retroactive to April 1997.

These two proposals would have a heavy impact on people recently entering the sport guiding business. Many of these people entered the fishery quickly because they heard rumors of limited entry and wanted to get in. Limiting entry would not be easy, but it is the best way to check the increases in the guided sport catch.

Sincerely,



Richard S. Bartolowits
Alaskan Sport Fisherman

Dept of Commerce (907) - 271-2809
 North Pacific Fisheries Management Council
 605 W. 4th Ave. Suite 306
 Anchorage, Alaska 99501-2252

Again taking another heading to the Editor of Anchorage Daily News "Halibut Sport Fishers, Speak up". I believe written by a guide from Euchar Point?

They forget their numbers keep increasing and they just keep taking for another. Look what is happening to the commercial salmon in Upper Cook Inlet. No longer can commercial fisher men make a living because of so many others wanting what some one else used to make a living at.

I sat, in Kodiak, and charter took even license plates numbers, names motor home plates, used for offices and called the Kodiak Ken. Baruch and asked why at that time commercial boats were being taped at their value not by their size as it is now, and was ited, they had no authority to go after these ^{closet sports guides} boats pulled for the water and pay mile usually for taped and their owners go other

27.
=

back into side on another Branch and
to both. It supports those ~~Branch~~ who
love to get most of what is supported.

I don't believe most Commercial
Fisherman want anyone to go without
that of their own needs, but I
do know the line on never
was fringed taking from the other
was fringed and complaining. They
are being deprived of what go down
here if there is second and look
at where there charter boats + guides
are trying to go to get a catch and
then look at the small size
of a lot of their catch.

I know the Commercial Fishermen
are out-numbered but I do hope
there is a bit of wisdom used
in replacing the dividers.

How can charter and

Guided Charters not consider
Fishermen Commercial? They get
paid just like the Commercial Fishermen.
except Commercial Fishermen have many
more expenses to pay.

Attending a Kenai Branch meeting
one night a guide got up and
stated his family has a B+B and
a King Salmon was worth the a

thousand dollars to him and his family and a small amount to a commercial fisherman. That got me the court visit. I open Salt fishermen since try to return King to the Salt.

I started with limiting King's which commercial fishermen gave up many years ago fishing commercially in the 60's except incidentally, they came since then rule. How can the fish be managed this way, Habitat along with salmon.

Thank you,

Mavis Cabana Retiree
 Box 607
 Homer, AK 99607

RECEIVED

JAN 06 2000

N.P.F.M.C

**From: Robin L. Reed
P.O. Box 1272
Kodiak, Alaska, 99615
(907) 486-3704 Phone
(907) 486-4146 Fax**

January 3, 2000

**NPFMC
605 west 4th Ave.
suite 306
Anchorage, AK. 99501**

Topic: Guideline Halibut Levels Halibut

To: All Members of the NPFMC

I would like to go on record opposing any special quota considerations being given to the charter or for hire sportfishery over that of other user groups.

I see both sides of the coin in that I have had a lodge operation on Kodiak Island for several years (Alaska's R&R Lodge), and I have been a commercial fisherman in Alaska for over 25 years, and presently own halibut IFQ's.

The point I wish to make is we all have to take the good with the bad. When stocks are up we all harvest more, when they are down we all harvest less, *but not any individual group should get a set amount on a declining stock*(For Hire Sports Fishing), while others have to reduce their harvest so a particular group may maintain a set quota share.

I personally don't believe that a reduction in my daily halibut catch per person because of quota reductions will impact my lodge business, I find most of my clients are oriented to have a good time and are willing to sacrifice for the good of the stocks and an equitable management program.

I hope when you make the difficult decisions on this subject. You take my perspective into consideration. I feel your responsibility is to manage the resource so we always have fish to catch whether in great or small abundance, and as various user groups it is up to us as individuals to manage our business and livelihood . If we succeed or fail it is up to us.

**Sincerely,
Robin L. Reed**

**RECEIVED
JAN 04 2000
NPFMC**

I support guided recreational fishermen
harvest rights. I don't support single fish
bag limit. Get a life. Don't go messing
with our charter boats. Don't let commercial
fishermen have enough.

Mike Alexander

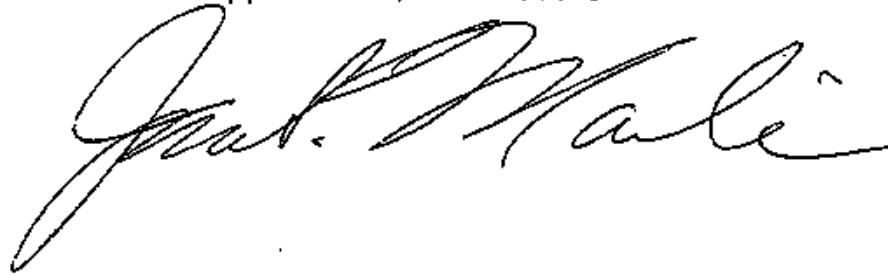
1-5-2000

To whom it may concern,

I absolutely cannot believe the pure greed of all commercial fisherman. I don't care if it's salmon, herring or halibut. Money is their only God. Money, money, money pure and simple. They got their quota raised a couple of years back but that's not nearly good enough. Now their mad because people who sport fish are allowed two fish. That's TWO!! The same two that it had been for years. However that might mean a dollar or two less in their pocket and they can't stand it. If they cut out all sport fishing maybe they could got outside for 6 or 8 months instead of just 3 or 4 months like they do now. I simply have a hard time believing it. It's greed ,greed ,greed, all over again.

With the cost of a boat, insurance, skipper, gear etc. and only one halibut per person it spells the end for sport fishing, Of course that is just what the commercial guys would like. Very few people sill pay \$175. or \$200. for one fish. I know I won't. Please do the right thing and leave the sport fishing quota alone. And if you really want to do the right thing have the fisheries board be made up of 5 commercial fishermen and 5 sports fisherman(or women). And please leave the sports quota alone.

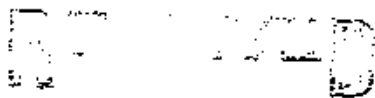
James Marchini
HC 60 Box 116
Copper Center, Alaska 99573



RECEIVED

JAN 07 2000

N.P.F.M.C



JAN 07 2000

DUANE R. PERSON

P.O. Box 201

Copper Center, AK.

99573 Ph. (907) 827 3315

N.P.F.M.C

DEAR SIRs:

I am a RETIRED 63 yr. old, 28 yr. RESIDENT OF ALASKA & ALSO A SPORTS FISHERMAN WITH OUT A BOAT THAT IS SUITABLE FOR OCEAN FISHING. NOR CAN I AFFORD A BOAT OF THAT DESIGN.

My wife & MYSELF USUALLY CHARTER ONCE A YEAR FOR HALIBUT FISHING - EITHER OUT OF VALDEZ OR HOMER. IF THE LIMIT FOR SPORT FISHING IS CUT TO 1 FISH EACH THIS WILL END OUR HALIBUT FISHING. WE ARE ON A FIXED INCOME, WE ARE VERY GRATEFUL TO BE ABLE TO HAVE FRESH HALIBUT TO EAT & TO VACUUM PACK WHAT REMAINS FOR FUTURE USE.

BEFORE ANYONE MAKES ANY CHANGES IN SPORT FISHING WHETHER IT BE FROM A PRIVATELY OWNED BOAT OR A CHARTER I BELIEVE THERE COULD BE SOME OTHER STEPS TAKEN!

- #1 ALL halibut 32" or less be released by ALL sport & charter boats.
- #2 IF THE LARGE FEMALES (OVER 100#) WHICH ARE THE MAIN BREEDING STOCK ARE RELEASED THIS WOULD HELP TO ENSURE MORE FISH FOR THE FUTURE. IF NECESSARY COMMERCIAL LONG LINERS WOULD BE ALLOWED TO KEEP A CERTAIN % OF THESE BIGGER FISH - THIS COULD BE DETERMINED BY STUDIES BY FISHERIES RESEARCHERS.
- #3 PLACE RESTRICTIONS ON THOSE big Trawlers with their WASTEFUL methods of fishing with their big NETS THAT CATCH EVERY SPECIES OF MARINE LIFE. THEY CAN DEVELOP NEW methods TO HELP PRESERVE FISH THEY ARE NOT LEGALLY ENTITLED TO. THE BYCATCH OF HALIBUT BY THE COMPANIES & THE WASTE OF HALIBUT IS CRIMINAL. BEFORE YOU COME AFTER THE LITTLE FELLOW (LIKE ME AND THOUSANDS OF OTHER SPORTS FISHERS) IT WOULD BE TO EVERYONE'S

Advantage To reduce The by catch
of The big boys off shore.

With IPQs commercial long liners
can now fish in good weather & do
it safely. This was long overdue.

Charter boats are booked for certain
days by certain parties. If the
weather is too bad, trips are cancelled
and sports fishers must rebook for
another day - a loss for both parties
but that is 'fishing'!

I believe if a minimum size was
set for halibut a number of charters
would be out of business - its criminal
to take the small fish & make a profit
at it. Not all long liners with small IPQs
are keeping their permits - many are
sold to bigger boat owners - will big
outfits eventually control the halibut
fishery? I remain,

Sincerely yours
Duane R Penn.

JAN 07 2000

N.P.F.M.C

Rory Bifoss
P.O. Box 7144
Ketchikan, AK 99901
907 225-0848
January 5, 2000

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

To NPFMC

I am a concerned commercial halibut fisherman writing to inform you of my position on the halibut charter boat management plan. I've fished halibut for thirty years and along with the shares that I've earned for those years I have purchased additional halibut shares. Charter boat fishermen erroneously claim that we were given these fish free of cost but this is not true. We've had a vested interest in these stocks for years and when the stocks were down we all conserved by limiting our catch. Charter boats, on the other hand, have never had to make this sacrifice.

If the halibut charter fleet is successful in their attempts to seize this unrealistic fixed number of fish, as opposed to a fair share of an adjustable quota, then I would be unable to meet the demands of my loan payments on my IFQ's. It is irrational to implement fixed or stairstep allocation of pounds rather than a percentage of a quota based on a sustainable yield.

The International Pacific Halibut Commission and the longline fleet have acted in a responsible and conservative manner in their management of the resource and have willingly adjusted to changes in the allowable catch. On the other hand, I have witnessed a growing charter fleet catching and retaining all halibut, regardless of size. This shows an unconscionable lack of concern for the resource.

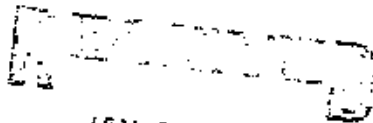
It would be in the best interest of all if the halibut charter fleet established a moratorium for their industry and if they were encouraged to utilize this valuable resource responsibly.

Thank you for giving me the opportunity to voice my opinion.

Sincerely,



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



JAN 07 2000

Marion Bifoss
P.O. Box 7144
Ketchikan, AK 99901
907 225-0848
January 5, 2000

N.P.F.M.C

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

To the NPFMC;

I am a concerned commercial halibut fisherman writing to inform you of my position on the halibut charter boat management plan. I started halibut fishing with my father in 1972, and have since married and continue to fish with my husband and two children. I recently purchased my own halibut shares and am now concerned that decisions being made regarding the halibut charter fleet could negatively affect my financial and lifestyle investment.

I urge the council to review and deny the charter boat request for the set number of pounds of fish annually as opposed to a fair share of an adjustable quota. The International Pacific Halibut Commission has managed the fishery extremely well based on the sustainable yield quota and to ignore this and allocate a set number of pounds now would discredit years of successful work by the IPHC, and would jeopardize mine and my families income and lifestyle.

Thank you for giving me the opportunity to voice my opinion.

Sincerely,

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

RECEIVED

JAN 07 2000

2638 Kenmore Circle
Anchorage, AK 99504
January 5, 2000

N.P.F.M.C

North Pacific Fisheries Management Council
605 W. 4th Avenue Suite 306
Anchorage, AK 99501 - 2252

Gentlemen:

Although I have fished halibut and salmon commercially through a portion of the 1980's, it was more an avocation. This, though, did allow me to view these fisheries from the commercial aspect. I have always sport-fished, but only occasionally with a guide or chartered service and from my observation, see little distinction between these groups. They are both occupationally licensed to produce their revenue from a common resource and both exhibit competitive behavior associated with that activity.

The "guided" industry, both fresh and salt water, compete most directly with the individual as there is common access to the resource. Even though their clients are classified as "sport" the activity most certainly is commercial. Perhaps develop another classification for this industry, but please do not categorize it within what is commonly recognized as sport fishing. A "Sport-fish Industry" would be acceptable, but do make a distinction.

The halibut charter fleet decimates the resource that is in close and available to the individual; as is evidenced by two, three and four hour runs out of Homer to find fish for their clients as well as the small size fish they become forced to retain in order to "fill". Perhaps this fleet should be limited; not just in fish limits but as to areas as well, dispersing them well away from in-shore areas that are accessible to the individual - including Ninilchik and Deep Creek.

Thank you for allowing me this access.

Cordially,


Martin T. Olson

1-5-00

DEAR NPFMC

I AM A halibut SPOT FISHERMAN, MY OPINION IS, DO NOT CUT THE LIMIT TO ONE FISH PER DAY. TWO THINGS THAT SHOULD BE DONE IS, 1 - THE CHARTER BOATS SHOULD HAVE TO REPORT THEIR TRIP HARVEST, 2 THE SIZE LIMIT SHOULD BE A MINIMUM OF 32 INCHES. TOO MANY TINY FISH ARE KEPT. THIS WOULD MAKE THE CHARTERS GIVE A BETTER EXPERIENCE TO THEIR CUSTOMERS. IT WOULD STOP THE ONES THAT RACE OUT AND GET THE LIMIT AS IT IS NOW AS FAST AS THEY CAN.

IN 20 YEARS OF HALIBUT FISHING, (MANY TRIPS PER YEAR) I HAVE CAUGHT ONLY 2 HALIBUT THAT HAD BEEN HOOKED PREVIOUSLY, SO RELEASING SMALL ONES DOESN'T DO MUCH DAMAGE. THANK YOU.

RECEIVED

JAN 07 2000

N.P.F.M.C

Don Nelson

Donald and Theresa Nelson
1530 Cache Dr.
Anchorage, Alaska 99507

Judd Peterson
3541 E 112th Ave
Anchorage, AK 99516-1431

January 5, 2000

North Pacific Fisheries Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501-2252

RECEIVED
JAN 07 2000
N.P.F.M.C

RE: Do not reduce sport catch

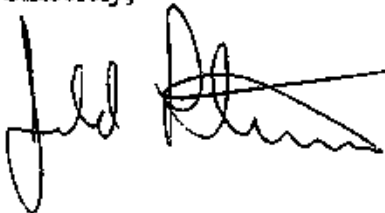
Dear Sirs:

I do not support the recreational catch for sport caught halibut to one fish on charter boats. I was amazed that the reason presented in the paper is that commercial fisherman have payments to make on their boats so charter boats must take less of the catch. Do you think that charter boats owners don't have boat payments also?

Natural resources belong to the public, not just commercial fisherman. Your guys are way to powerful if you can tell the general public that we can not hire a boat to go catch two fish when the commercial by-catch is greater than all the sport catch. You are not taking the fish away from the charter businesses, you are taking it away from the public. It's all to clear, next you will be after the sports fisherman in his skiff.

Let the public have their 2 fish! Commercial fisherman will always get the lions share regardless.

Sincerely,



NPFMC
605 W. 4th Ave. Ste 306
Anchorage, AK 99501-2252

1/6/00
RECEIVED
JAN 07 2000
N.P.F.M.C.

Re: Public Comments Halibut Charterboat Management

Dear Chairman Kauber and members of Council,

I am a 35 year resident and fisherman from Ketchikan and Sitka and am outraged at the increasing take of halibut by the Charterboat fleet in the face of declining harvest quotas and the growing "local depletion" of halibut throughout the Sitka Sound area.

I have longed for halibut since 1965 and hold a small IFG now and always have fished from a skiff. Up until 5 years ago the few thousand dollars I could earn on halibut was a welcome income supplement for me. I can no longer find fish inside waters and do not have the vessel and electronics to venture outside. Charter boats fished inside waters until 5 years ago when they had to move outside to find fish.

Halibut harvest levels must be based upon abundance rather than a fixed number for all users, with all sectors bearing the brunt of reduced fish populations. Charter boat clients do not need to take home a volume of fish to pay for their Alaska trip. Law enforcement should initiate an undercover "sting" investigation of Charterboat operations in the Sitka area. I believe spot fish is going on the "Black Market" when it leaves Alaska.

I urge a Charterboat allocation based on abundance and historic records. Stay with your 1997 decision and establish effective management measures. I urge the reconsideration of mid-season Charterboat closures to encourage the fleet, especially the quality operators, as we have here in Sitka, to stay within their allocation.

I remain
Ben Mitchell
103 Davrin
Sitka, AK 99835



Halibut is a public resource and I am prevented from getting fair share by Charter over-fishing

RECEIVED

JAN 07 2000

N.P.F.M.C

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

Dear Chairman Lauber:

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides an allocation based on 125% of the 1995 charter fleet's harvest. A set allocation for one commercial group - charter boats - while the other commercial group - long liners - absorb all reductions in quota, is a sure formula for the demise of the commercial halibut long line fleet.

The IFQ program as implemented by the council has resulted in an orderly fishery. The ability to buy and sell quota has resulted in substantial investments by many of the participants in the halibut IFQ fishery. A council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to the fleet, and in many cases, the loss of a family business.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

Sincerely,

Nick Elgin

I am a 16 year-old fisherman who has purchased IFQ's a few years ago. The money I make fishing these IFQ's puts me through a boarding school. I really need all of this money. Thanks

Rumac Corporation
1838 BOOTLEGGERS COVE ROAD
ANCHORAGE, ALASKA 99501

K. OLIN RUDE
PRESIDENT

4 January 2000

EDNA L. RUDE
SECRETARY-TREASURER

North Pacific Fisheries Management Council
605 W. 4th Ave. Suite 306
Anchorage, AK 99501-2252

RECEIVED
JAN 07 2000
N.P.F.M.C.

Gentlemen:

It is difficult for me to believe that the recreational or sport fishing of Halibut should even be considered in limiting the taking of Halibut in Alaskan waters.

When I first came to Seattle in 1935 tons of Alaskan Halibut were being marketed there with outside interest and fishermen. It was the same when I left Seattle to come to Alaska in 1942.

Now we have an Alaskan charter boat sport fishing industry, Alaskan owned, that has grown and expanded with the tourist industry. Think of the number of dollars left and spent in Alaska for each fish caught by the tourist. Also, do not ignore the disaster to the charter boat owners who have contract payments on their boats and equipment, lodging and restaurant owners who are all benefactors of this part of the tourist industry of Alaska.

If you feel that it is necessary to cut the halibut harvest do it where the problem originated with the commercial halibut fishing industry.

Sincerely yours,

K. Olin Rude



January 6, 2000

NPFMC
605 West 4th Ave Suite 306
Anchorage, Alaska 99501-2252

RECEIVED
JAN 07 2000
N.P.F.M.C

3065 Brittany Place
Anchorage, Alaska 99504

Dear North Pacific Fisheries Management Council Members,

I encourage you to vote to set the annual limit of halibut per user, similar to the king salmon harvest limit in Cook Inlet.

Keep the daily quota of 2 halibut per person

Thank you.

Cynthia Jaramon
333-6577



1/7/00



RECEIVED

JAN 1 0 2000

Dear NPFMC members
To replenish the cod

Inlet halibut resource,

completely close the

harvesting of ALL

halibut for 12 months

July 1 to June 30, 2002

ADVERTISE 1yr ahead + 1yr

people ~~know~~ the situation
Cindy Miller
694-3346

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NPFMC
Post Card

NPFMC

605 West 4th Ave,
Suite 300

Anchorage, Alaska

99501-2252

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th AVE., Ste.306
Anchorage, AK 99501

RECEIVED

JAN 10 2000

N.P.F.M.C

I have been commercial fishing for halibut for the last 20 years and I am greatly concerned over the possible charter fleet allocation of halibut. As you well know the charter fleet has been growing at a rapid pace for the last ten years. I strongly urge you to stick with the decision you made in 1997. Please stick to the historic catch levels that the charter fleet made prior to 1995. It is not the job of already established fisheries to support new or growing fisheries. Limited entry was put into effect for a reason and the same thing needs to happen to the charter fleet. A plan needs to be developed to stop the wildly growing charter fleet and also to control the current charter fishermen.

I do not feel it is right for a new fishery to come in and knock out or cripple a traditional fishery in such a way that the historical fishery is no longer viable or greatly hindered. I watched this happen with the commercial troll fishery in SE Alaska. I trolled for salmon for over 20 years and just last year I quit trolling and started gill netting. Why did I leave a profession that I loved and made decent money at? The charter fleet started getting their piece of the pie of king salmon and basically put me out of business. Just last year the commercial trollers in Alaska were only allowed 5 days to fish king salmon during the month of July!

This same type of fate is going to happen to the commercial halibut fishery in Alaska if drastic measures aren't taken to control the halibut catch by the charter fleet. If the amount of money I make from halibut fishing drops by 20%-40% then this may well cause me to sell out of fishing altogether. I've worked in the commercial fishing industry for 26 years and at this time I own a 42 foot fiberglass vessel. I sure hope my retirement isn't spent sitting on the beach watching out of staters catch fish that I use to. I've been a resident of Alaska for 32 years and all the money I make is spent in Alaska!

Sincerely,
Brian Merritt
Brian Merritt
F/V Sharlene C

CC: Governor Tony Knowles
State of Alaska
Box 11001
Juneau, AK 99811

Honorable Rick Lauber
NPFMC
605 West 4th Ave. Set 306
Anchorage, AK 99501

RECEIVED

JAN 10 2000

N.P.F.M.C

1-1-00
801 Charles #A
Sitka, AK 99835

Hello,

My name is Bert R. Bergman and I am a halibut fisherman. I am writing to you concerning the halibut charter issue that will be decided at the February council meeting.

The first time that I went halibut fishing was aboard my dad's boat when I was twelve years old. It was an eight day halibut opening in June 1983. Our 40' troller, which I now own, was based out of the rural community of Edna Bay, Alaska. In those days I was not worth much as a crew hand but it was my dad's first season fishing so he did not know the difference. We should have caught an boat load but we were so green we were just lucky to bring any gear back at all. Through most of the "derby day's" I continued to fish with my dad. Some times we caught fish, other times we lost all our gear, but that's fishing.

When the IFQ system was implemented I was determined to buy my own quota. I saw buying quota as way to supplement my trolling activities. Convinced that I would never make "big money" fishing dad's small quota share, I went looking for a better job. After the derby's jobs on good boats were hard to find. I took a 1/3 cut in pay and got a fair job with a skipper that was more than slightly nuts. In the derbies this guy always had a hard time getting crew to stay more that one season and I found out why. But I stuck it out three years and finally was able to save enough for a down payment on my own quota. I mortgaged my wood troller to the hilt, which is not much, and got a loan to buy 6800 lb. of 2C halibut. I am embarrassed to say how much I paid a pound for my quota, but I am happy to be the skipper. I am looking forward to the day that I will own outright my first piece of quota.

Although I do fish for halibut, most of my income is been derived from salmon trolling. As a troller I am all to familiar with allocation issues with the charter fleet. I think I understand the drive that brings people to Alaska in pursuit of fish. If I had grown up in a different region of the country perhaps I would be one of the people coming to Alaska looking for excitement. I now live in Sitka and have witnessed the money, and mayhem, that chartering brings to the community. Although annoying at times, chartering is good for the community. However Sitka is best served because there is both a commercial and charter fleet is based here. Diversity is always good. Somewhere a balance must achieved to keep both industries.

Basically I believe that the charter fleet should be given some sort of allocation, preferable 125% of the 1995 charter catch. It should follow a "share that pain, share the gain" type of philosophy since the biomass is always subject to change. In addition I think that some type of nonresident annual bag limit would help the charter fleet stay within it's allocation, much like the Board of Fish did with king salmon in southeast. Some

charter operators say that this type of proposal is bad for business. However when I go to the airport in the spring there seems to be no shortage of sport fishermen coming and fish boxes leaving.

The charter boats will say that they are just doing a service for a client, and are representing sport fishermen everywhere. I actually believe that they are commercial operators just like fishermen. Charter boats do represent sport fishermen, but only the one's who are wealthy enough to come to Alaska and pay big bucks to go fishing. Commercial fishermen are the ones that provide product to the consumers that don't have the money or access to catch their own. What about protecting the rights of the consumer to get a healthy, wild product at a fair price.

I was not a big winner in the IFQ giveaway. I am not exactly happy about the effects of implementing IFQ's on small rural fishing communities like Edna Bay. But regardless, I have worked hard for the ability to buy every pound. I do not want to do all that hard work to loose it to the charter fleet. I would like to think this would be the only time that the charter fleet will threaten my longlining. However I doubt very much that will happen. If things are anything like the troll/charter king salmon issue the charter boats will be back asking for more. Some say that chartering is the wave of the future, maybe that is true. I don't think that it's fair to continue to take from one user group which has to pay of the pounds to give to the charter fleet which has been expanding without limits. Maybe charter boats should have to pay for quota if they want more than the 1995 allocation. Perhaps the charter boats could form a nonprofit organization, they could assess themselves a tax like he aquaculture associations. If this nonprofit was given authority, it could buyout commercial quota as the need dictated. If charter boats are making so much money it would be as easier for them to buy quota then me. This way the state of Alaska will still benefit if chartering is the future, and longliners will not be displaced without recognition of their financial commitment.

Now you have heard my little sob story filled with how NPFMC process might work to serve me better. I am sure that you heard all of this before, but I would like to believe that there is a future in longlining for me. If there is a to be constant undermining of the return on my investment just tell me now. It has been hard enough for me to get into this fishery after IFQ's changed things. If I have to work all life to get to a reasonable amount of quota, I do not watch my family's future simply get reallocated. Thank you for your time that you spent reading my letter.

Sincerely,



Bert R Bergman
F/V Norma J

U.S. Pharmaceuticals
Pfizer Inc
235 East 42nd Street
New York, NY 10017-5755
Tel 212 733 4811 Fax 212 808 8945



200 East 90th Street
New York, NY 10128
January 6, 2000

U.S. Pharmaceuticals

Jonathan G. Schiller, RPh
Manager—Customer Marketing Group

In reply to: Public Access to Halibut

**Richard Lauber
North Pacific Fishery
Management Council
605 West 4th Ave #306
Anchorage, Alaska 99501-2252**

RECEIVED
JAN 10 2000
N.P.F.M.C

Dear Richard Lauber,

I am very concerned about the efforts to limit access to Salmon and Halibut for the Sport Fisherman. For the last 6 years I have traveled to Alaska to partake in the wonderful fishing opportunities provided within your state. I travel with 6-8 friends and colleagues and spend on average \$5,000 per person or \$30,000 - \$40,000 during our annual 10 day trip. If there are further limitations on the amount of Salmon and Halibut that we may harvest, we will not be returning to fish in Alaska in the future.

Please not only protect this wonderful resource, but also protect the fishing (and hunting) opportunities for sportsman like my friends and me.

Individual sportsman like me may not have a loud well organized voice, however, people like me who spend thousands of dollars fishing/hunting in your state will continue to visit (and spend money) year after year if allowed the opportunity to harvest some of the abundant natural resources.

Jonathan Schiller

1/6/2000
To The North Pacific Fishery
Management Council:

I am a recreational halibut
fisher person whom is adamantly
against you limiting my halibut
catch to 1 per day.

I recommend you leave the
daily catch limit at 2, but limit
the yearly catch to 4 per person.
Thank you.

Cynthia Jaranson
PO Box 210082
Anchorage, Alaska 99521

RECEIVED

JAN 10 2000

N.P.F.M.C

333-6577

1-7-00

Dear Chairman Lauber.

I am writing concerning the halibut allocation to the charter fleet. I favor an allocation based on their 1995 harvest. Their percentage of the quota should go up & down with the total allowable catch, set by the halibut commission.

I am a 32 year old son of a fisherman. I never received any IFO because I worked aboard my dad's boat during the qualifying years. I now have bought quota shares and am still paying for them. I do not think it is fair that the NPFMC set up the IFO system encouraged deck hands to invest in IFO. Now the NPFMC is considering reallocating percentage that I bought & paid for to the charter fleet.

Please do what is fair and what will ensure a commercial fleet.

Thank You

Perry A. Leach

Dwight E. Riederer

22928 SE 406th St.
Emmuel, WA, 98022

Phone (360) 802-0664
Fax (360) 825-7583

January 06, 2000

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

RECEIVED

JAN 10 2000

N.P.F.M.C

Dear Mr. Lauber,

I am writing to oppose actions by the ADF&G and the NPFMC that would provide a fixed poundage or "stair step" allocation to the Halibut charter fleet.

The common sense approach in addressing this mess caused by the huge growth in the charter industry in Alaska is to "IFQ" the Charter fleet at their present levels, and as they demand to grow, they can buy out the commercial IFQ holders. We are always hearing how a sport caught fish is worth so much more than a commercially caught fish, so a charter operator wanting to grow his business should be able to get a good return on his investment in IFQ's. The Charter Industry itself should recognize the harm that unregulated growth will cause to themselves and their customers experience, let alone the livelihood of the commercial fishermen that have utilized and been good stewards of this resource for over a century. I must mention a couple of points that need to be addressed when deciding how to handle this issue.

Many in the Charter fleet have been dishonest in representing their catches of halibut in their logbook program. The Charter Industry's catch supposedly doubled in 2C between 1997 and 1998, the later being the pre-announced base year to be used for regulation purposes. Did fishing really get that much better in 2C? I know personally a charter guide who was told by a lodge owner in Elfin Cove to log the limit on halibut every day of the clients trip even if the client never even wet a line for halibut. Everyone seems to know similar stories but it is hard to get someone to come forward and turn in their neighbor for fraud. I guess at the last council meeting it was brought up that an undercover agent was on board a charter vessel that falsified logbook entries after a poor day of fishing. There has to be a way to cross check charter logbooks with client interviews or air freight bills to see if each one of these guys are really flying out on a Beaver with a couple hundred pounds of Halibut filets along with their other catch and luggage after a five day trip.

How can I, as a commercial fisherman, support area closures around places such as Sitka and Cook Inlet, if all it gets me is more sport /charter catches and therefore more area closures. We get kicked out of an area around somebody's backyard, so that they can catch more fish and then kick me out of the next place. 2C in particular could become one big sanctuary with everyone's backyard saved for the new sport charter industry. I'd have less of a problem with area closures around some towns if I didn't think every pound caught in those areas was coming out of my hide. Bringing the charter industry into the IFQ system would bring the two user groups together on many common interests and as a longliner, I could support some of the area restrictions I am asked to accept now.

Bringing the Charter fleet under the IFQ program could grandfather the fleet in at it's present level and the charter industry could get as big as it cared to, while the commercial fishermen who have bought Quota the last few years could stay or sell out as they chose. We have invested heavily in this fishery, as encouraged to do so by NMFS and the State of Alaska. I have crew that fished for decades in the halibut fishery but did not get any Quota. Now they have loans anywhere from 50-200 thousand dollars on quota they have purchased. These guys are Alaska residents and the State of Alaska needs to stand behind them in this issue. It's the right thing to do. Thanks for your time.

Sincerely, Dwight E. Riederer



THE ANCHORAGE HILTON

591 Guest rooms, Panoramic views of the Chugach Mountains and Cook Inlet, Alaskan Jade front desk, Sports edition Bar, Berry Patch and Top of The World restaurants, athletic club with pool and jacuzzi, tour desk, business center, banquet and ballroom facilities.

1-7-00

TO NPFMC MEMBERS.
AS A SPORT FISHERMAN I AM
AGAINST REDUCING THE DAILY
HALIBUT LIMIT BY 50% UNLESS
ALL LIMITS BY ALL USERS
BE LIMITED BY SAME
PERCENTAGE.

Sherad Millette
907 624 3340

500 W. Third Avenue, Anchorage, Alaska 99501
(907) 272-7411 RESERVATIONS 1-800-HILTONS FAX (907) 265-7140



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JAN 10 2000

N.P.F.M.C
NPFMC
605 W. 4th Ave
SUITE 306

ANCHORAGE, AK.

99501-2252

WAYNE A. DAVENPORT

RECEIVED

JAN 10 2000

N.P.F.M.C

January 7, 2000

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

Dear Chairman Lauber

It is hard for me to comprehend the rationale regarding the proposed halibut allocation which favors one Alaskan commercial group over another. Further, I cannot understand why ANY allocation would be made on a "fixed" basis, when sound management has relied successfully on flexibility. It is absolutely unfair and, in fact, absurd to require one user group - the longliners - to absorb quota fluctuations. What could possibly be the reasoning for exemption of a rapidly growing commercial industry - the charter fleet - from the same process? I would point out also that the sport/charter fleet has at present no size restrictions to their halibut while we longliners willingly adhere to a 32-inch limit in the interest of good management. This lack of control is wrong and wasteful.

I am 63 years old and have been a commercial fisherman most of my life. I make a decent living; but due to recent changes in fish prices, it has been necessary for my wife to work also. It is evident that foreign competition in the salmon industry will increase, so we must depend one and more on longlining to survive. I have always been impressed and proud of halibut management practices that have perpetuated our resource; but the charter fleet is growing rapidly and will have an increasing impact on the resource. They must be controlled also by good management practices. A fixed percentage, especially one based on 1998 harvest, is wrong and could be a disaster for the halibut and the longliner fleet. Give them an allocation, but make it a fair one: 125% of the 1995 harvest.

It is not just that we have been in business longer, and are the "traditional" or "historic" participants; we are doing this for a living, not for fun or as a retirement business. We provide jobs, we put kids through school, and we contribute much more to Alaska's economy and precious heritage than the charter fleet.

Sincerely,



Wayne A. Davenport
Alaskan Commercial Fisherman

Alaskan Game Fisher

P.O. Box 1127 • Soldotna, AK 99569 • email: akpt@alaska.net • (907) 262-2980 • Fax (907) 260-2676 • 1-800-320-2980



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JAN 10 2000

N.P.F.M.C

To: NPFMC
605 W 4th AVE #306
Anchorage AK 99501-2252

From: Mel Erickson

Subject: Halibut Charterboat Restrictions

I strongly oppose any Restrictions or bag limit Reductions placed on the charter boat Industry and the guided angler. The reasons why I oppose are listed below.

- 1) There is no conservation concerns for halibut Stocks at this time and the IPHC lists halibut as Abundant and healthy.
- 2) There is no sport representation on the NPFMC and it does not fully understand the Guided sport fishery and therefore is unqualified to regulate the Halibut sport fishery.
- 3) Guided anglers are the same as unguided anglers and should be regulated as such.
- 4) Halibut is a public resource and charterboats just provide an opportunity for the public to access their resource.
- 5) The commercial and sport allocations should be split 50/50 of the TAC.
- 6) The sport fishery did not get more fish to harvest in years of high abundance when the TAC was raised, So why should we take a reduction in years of less abundance and a lower TAC?
- 7) The commercial fleet takes the large majority of the harvest and wastes more than the total sport catch so the commercial fleet should bear the responsibility of conservation of the public resource it is allowed to harvest.
- 8) The economy of many communities would be destroyed by a reduction in bag limits.
- 9) This is an attempt by the commercial fleet to hoard the resource and not share it with the public sport user.
- 10) While there may be problems with the uncontrolled and unregulated growth of charter boats in some areas reducing the bag limit will not solve that problem. In order to solve the problem you must make higher qualifications for entry into the charter boat industry and limit the number of boats in overcrowded areas.

Thank You,


Captain Mel Erickson

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JAN 10 2000

1-6-2000

Honorable Rick Luber chairman,

N.P.F.M.C

I am a commercial fisherman who last year got a loan for IFQs in 3A. We as commercial fishermen are limited by moratoriums, fishing permits, quotas, escapements, IFQs, and systems in our fisheries directly linked to abundance or historic levels.

The charter people I've talked to in Homer act like and say they want unlimited sports fish from a limited resource.

Delinking the halibut charter harvest from abundance based management is poor policy. It also gives the charter operators no incentive for conservation.

Abundance based management is tied to every fishery and user group and should apply to charter operators.

I am very nervous that the 3A IFQ's I am buying with a state loan will cause me to go broke or take the profits I make in my salmon ^{operation} out west.

The government promised stability thru IFQ's.

Please limit the charter operators according to abundance. It's Fair.

Sincerely,
John Ludwick Jr
E/V VIKING

Honorable Rick Lauber
North Pacific Fisheries Mgt. Council
605 West 4th Ave. Ste. 306
Anchorage, AK 99501

RECEIVED

JAN 10 2000

N.P.F.M.C.

Dr. Mr. Lauber,

I am writing to urge you not to risk the health of Alaska's Halibut stocks by giving the rapidly-growing Charter Fleet any more than the 125% of the 1995 catch. To grant this user group an increasing quota will threaten my livelihood from this fishery.

Depending on price, my Halibut quota, which I earned provides up to 50% of my annual income. To see the allocation eroded any further would threaten my economic security. We are now in a period of declining Halibut abundance, and the Charter Fleets demands are not justifiable scientifically or economically. All other users (commercial) understand and support the abundance type management we have. To allow one user group to increase catches despite decreasing quotas is not fair, or good management.

I understand that charter boats want to grow & grow & grow - but I can't grow my quota - unless I pay for it by buying more quota shares. You cannot allow this group

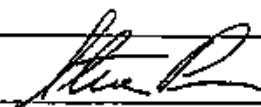
to grow uncontrollably.

You need to address the possibility of a moratorium on charter catches until a suitable allocation plan can be developed.

Here in Southeast Alaska, a viable Halibut fleet is important to many families and communities - even Juneau, where I live.

Please maintain the existing allocation plan

Thank you for your consideration.

Steve Pierce 

Box 240443

Douglas AK 99824

Box 1441
Wrangell, Ak 99929

January 2nd, 2000

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

RECEIVED
JAN 10 2000
N.P.F.M.C

Dear North Pacific Fishery Management Council Persons:

I am a commercial fisherman who, along with my wife and children live in Wrangell. A large part of our income is derived from halibut fishing. For over twenty years I have worked in this fishery, helping build a history for IFQ's and reinvesting in the quota shares. To say that I am dissapointed to see the charter fleet try to take this investment from us without having invested anything would be an understatement! This charter fleet continues to expand at an alarming rate, demanding that they be given all fisheries resources so they can continue their meat fishery, while hiding behind the skirts of the resident sportsfishermen. Well, I hope you don't give them the fish that I have historically used to feed my family. The only sensible solution is to make them buy IFQ if they want more.

Sincerely,



Chris Gugenbickler
F/V Maranatha

Luck of the Irish Charters

P.O. Box 55194
North Pole, Alaska
907 488 9890

RECEIVED
JAN 10 2000

N.P.F.M.C

January 3, 2000

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

Dear Sir:

I write to you in regards to the Halibut Charter Boat Management issue. I understand it is your primary purpose to manage the halibut stocks in the best interest of the fishery, however it is also of the highest importance to preserve the livelihood of many charter operators and the tourist communities which your decision will affect.

My wife and I have operated a charter company for nearly twenty years and believe you are very near to making a decision which will put us out of business. Our business is our families sole source of income. We stand to loose everything, our boat, our home, and our way of life with a decision you will make and yet we have no control or input into the process other than through writing you or personal testimony at your meetings. Commercial interests hold every voting seat on your council.

When the commercial halibut quota system was established, your primary goals were to stabilize the catch and provide a continuous supply of fresh halibut to the public. This has led to a small increase in price for both the fisherman and the consumer. Why won't you do the same for another halibut group user?

Please cap the fleet through a moratorium on new entries and additional vessels into the charter industry in the areas of the state where needed. We must have a two fish limit and a season that is not interrupted. Our user group does not catch and utilize what the commercial user group throws back dead.

If a punch card system is needed to control the number of fish taken by the sportsmen, please review this, but it is not practical for the sportsman to charter and take only one twenty five pound per day. A one fish limit will make the a sportsman target the largest fish they can find, putting a further strain on the commercial size fish.

Sincerely


Patrick M. Bookey

Box 393
Wrangell, Ak 99929

January 2nd, 2000

RECEIVED
JAN 10 2000

N.P.F.M.C

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

Dear Councilpersons:


I am a commercial fisherman who holds IFQ for halibut. I and my family rely on this holding to maintain our livelihood here in Wrangell. We are quite concerned to learn that these holdings might be eroded by the ever burgeoning charter fleet. Not only were we awarded IFQ because of our past participation but we have bought poundage. To have this poundage awarded to the charter fleet after we have bought and paid for them would be most unjust.

I was quite disturbed to learn of the unprecedented and totally unprofessional antics of the sports fish division. I am referring to the recommendation to the NPFMC that the charter fleet not share in the conservation of this resource, but to have the commercial fleet shoulder all the responsibility. This was certainly a conflict of interest, as many of these people will retire from their state jobs and go into the charter business. I feel that those responsible should be held accountable for their conduct.

Please give us an even brake on this one and have all fisheries share the burden of conservation and abundance evenly. Clearly this is a "no-brainer", the only fair answer is to have those in the charter fleet who want more fish, buy them just as we have.

Thank you for your consideration.

Sincerely,


Tony Guggenbickler

January 5, 2000

North Pacific Fisheries Management Council
605 W. 4th Ave. Suite 306
Anchorage AK 99501-2252

RECEIVED

JAN 10 2000

N.P.F.M.C

Dear Council Members:

I am writing to express outrage and disapproval for the proposal to cap personal halibut fishermen to a bag limit of one. A responsible plan would be to cap the population participating in the most wanton waste and disregard for fish populations - the commercial fishing industry. Commercial fishermen are taking in some of the highest quantities of fish ever recorded, and yet you propose placing a limit on personal bag limits to just one fish. Personal fishermen are not wasting the resource, nor are they abusing it. Unlike commercial fishermen we fishermen that land under the category of recreational sport fishermen have not increased our takes. If there is a decrease in population as you would have us believe then who would be the best candidate for reductions? Who has been taking the most fish, and wasting more of the valuable resource than is even caught by private individuals?? Commercial fishermen, with their increased fish catches.

We recreational sport fishermen do not waste the fish we are allowed to catch, we respect the opportunity to catch these fish, and we use it to feed our families, as we make our livings in the Last Frontier. The commercial industry holds no such regard for the halibut resource, in fact they seem to prescribe to a more short sighted belief of taking all the fish, selling it to the people they've driven off the waters with insane limits and destruction, then they move on to another area.

Both commercial fishermen and recreational fishermen could find a balance that works for everyone, but that won't happen unless the greedy money hungry commercial fishermen accept cuts to their own limits. I refuse to watch as my rights to halibut are taken away by greed and political folly. What a sad commentary on Alaskan life that it comes down to personal limits being set by the commercial fishing industry. There is no representation for those forced to live under your proposed bag limit of one, and in fact the very idea of PERSONAL limits being set to make more room for commercial waste, by commercial fishermen, is both destructive and careless.

Sincerely,

Alicia Marie Carper
31150 Catch Up St
Anchor Point, AK 99556
907-235-2496
aliciacarper@yahoo.com

31150 Catch Up St.
Anchor Point, Alaska 99556
1-05-00

NPFMC
605 W. 4th Ave.
Suite 306
Anchorage, Alaska 99501-2252

Dear Sir:

I am writing to protest your decision to reduce the recreational halibut limit to one fish. Over the last number of years, the commercial limit has raised drastically, but the personal bag limit is still the same. Now, in light of a reduced biomass of halibut, you propose to reduce my personal bag limit to one fish. Reduce the commercial IFQ, that is who has been taking 75% of all the available halibut. The commercial fishermen waste more halibut than the recreational fishermen even catch. The idea of the NPFMC setting bag limits for sports fishermen, sucks. Where is our representation on this council? Being dominated by commercial interests, it should come as no surprise that you would be looking to reduce our halibut bag limit, while the commercial ifq's have skyrocketed. If the halibut biomass cannot stand the increases that you gave yourselves, reduce your OWN bag limit. I will not sit idly by, as my halibut bag limit is reduced, so some commercial fisherman can sell me my own halibut.

Sincerely,

Brian E. Carper
Brian E. Carper

RECEIVED

JAN 10 2000

N.P.F.M.C

January 6, 2000

RECEIVED

JAN 10 2000

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

N.P.F.M.C

Dear Chairman Lauber,

I have been a halibut longliner in Alaska since 1983. I believe that the present IFQ program does work well! I hire crew, but when school is out my two teenage girls and wife are my help for a part of the summer. Since IFQ's, my wife and children and myself have each borrowed and invested more into IFQ's feeling confident that it was a good sound program essential for our fishing future! Any council action that would reduce quota to the long line fleet for reasons other than conservation would be harmful to a long time committed Alaska industry and result in reallocation to groups, such as the charter fleet, unjustly.

We, the commercial fishermen and women of Alaska provide a public resource for and to the vast majority of the American people who cannot afford the time nor money of a sport fishing vacation, an opportunity to have Alaskan fish on their tables for a very reasonable cost.

The State of Alaska CFEC has compiled statistics stating total permit and crew license holders totaled 37,255 people in 1997 for a gross earnings of \$970,873,570. In excess of \$37,000,000 in 1998 from fisheries business and resource landing taxes was paid to the Alaska Department of Revenue. This does not include cold storage, wholesalers, retailers, shipping companies, restaurateurs, employment wages and taxes generated to the state and nation from all of the Alaska commercial fishing industry.

The North Pacific Fishery Management council should keep the charter allocation at 125% of the 1995 harvest, a very generous allocation.

It is imperative that the Council fairly protect and maintain one of the state's largest work and revenue sources, Commercial Fisheries!

Sincerely,



Robert S. Fredrickson

F/V New Day
617 Katlian St., A-11
Sitka, AK 99835

Jan. 2000
F/V Sierra Mar
C/O Wards Cove
Ketchikan, AK

RECEIVED

JAN 10 2000

N.P.F.M.C

Dear, Chairman Rick Lamber

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

I can't tell you the level of distress I am feeling to think the ADFG is sponsoring an option to grant the Guided Charter Industry a fixed allocation of the halibut resource. There can be no justification to give a fixed quota, that comes from those who have paid for their quota to a new user group. What is the Guided Charter Industry if not just another form of commercial fishing? The ADFG previously has not and should not be in the allocation business or an advocate for any particular group. **Their business and mandate is biology and management.**

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

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

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

Sincerely,

Kevin Seabeck F/V Sierra Mar

Kevin Seabeck

North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

6 January 2000

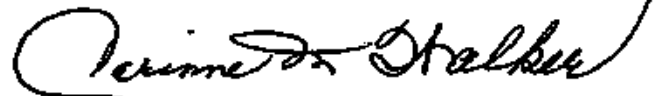
Gentlemen:

I can not believe that you would favor such an act of favoring commercial fisherman in the catching of halibut. Halibut do NOT belong to the commercial fishing industry. They are there for everyone who has a valid fishing license.

I am just one old lady, whose one trip a year to fish for halibut is being jeopardized by such an act. I go one time a year from Wasilla to Homer, about 270 miles one way, pay for overnighting in Homer, pay \$150.00 a day on a charter. Do you think I am going to be able to do this to catch ONE fish? It smells of rot to me, that fishing will be only for the affluent, and not the ordinary citizen.

One thing you could do is limit charters to no more than 12 persons. Some of the Charters take out 20 some folks (combat fishing), don't care whether you get a fish or not, and there are a lot of "fly by night" charters, folks that come up from Washington and Oregon or California, don't know that waters, don't care if you catch, don't care if you enjoy, its just grab your dollars and grin. I don't know what it requires to get Charter Licences, but do think they could be screened. Also, we who live here have to compete with all the "tourists" (another big industry) and who usually have money, so guess they don't care either, they are here for the "pleasure", whilst we who live here, like to eat it.

I just want to know why you - the management - think you have to protect the commercial fishing industry. Again, I think a lot of them are from the lower 48. I sure ain't worried if Japan gets fish or not, they don't put any money in the American pot.



Coranne M. Walker
761 Colonial Drive
Wasilla, Alaska 99654

RECEIVED

JAN 11 2000

N.P.F.M.C

Saturday, Jan 8, 2000

North Pacific Fisheries Management Council
605 W 4th Ave, Ste 306
Anchorage, AK 99501-2252

RECEIVED

JAN 11 2000

Re: New Charter / Sportfish Halibut Limits

Dear Sir / Madam,

N.P.F.M.C

Please add the following comment in strong opposition to your proposal to cut Halibut allotment to Charter / Sport fishermen in Alaska:

I strongly oppose any new limits on the rapidly growing Charter and Sport fishermen catch of Halibut in and around Alaskan waters. Halibut is a commonly held resource. As such, your job is to spread it among as many fishermen as possible. This means placing restrictions on the commercial catch by a couple thousand commercial fishermen so that many tens of thousands of charter / sport fishermen can benefit.

Additionally, the reported bycatch by the commercial fleet approaches the entire catch by the charter / sport fishermen. If this bycatch problem were to be solved, the commercial fleet would be able to take more Halibut home for sale.

The Council also ought to start allocating more Halibut to the charter / sport fishermen. 75% of the entire Halibut catch (as reported in the Anchorage Daily News) currently goes to the commercial fleet. That total ought to be quickly lowered to 50% (including bycatch).

Sincerely,

Alex Gimarc
Alex Gimarc
2022 Brandilyn St.
Anchorage AK 99515

aimarc@alaska.net

RECEIVED

JAN 11 2000

N.P.F.M.C

January 6, 2000
17031 Kiyona Court
Eagle River, AK 99577

North Pacific Fisheries Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501-2252

Dear Council Members,

I have been a citizen of Alaska for 23 years. I have fished the oceans and rivers every summer to harvest halibut and salmon for the subsistence of my family. Over this period, the regulations on private citizens' access to and use of these resources have become increasingly restrictive.

The resources of Alaska belong to the people who live here. They are not the property of commercial fishing interests who then decide what meager portion of fish the people will be "allowed" access to. I lived in Kodiak, Alaska for 20 years and worked on and around commercial fishing vessels for several years. I have personally observed the grossly high amount of halibut caught by commercial trawlers, as by-catch. The amount of halibut caught by "the people" to feed their families is a fraction of the wastage of the resource due to these commercial trawlers.

Next month you will decide whether or not to decrease the halibut bag limit for sport anglers fishing from charter boats. I know live in Eagle River, Alaska and have come to rely on the halibut charter companies to provide my family with it's yearly intake of halibut. (which we have grown so accustomed to having.) If you decrease this limit, my family will be forced to go without this subsistence resource, which has been a part of my family, all my life. This will serve no useful purpose and will likely result in widespread civil disobedience of the regulations, not to mention the strike to the economies of those coastal towns who have come to rely upon the money derived from charter boat operations.

I urge you to reject any attempt to decrease the bag limit for sport anglers no matter who owns the vessel they fish from.

Sincerely,



Todd S. Massie

RECEIVED

JAN 11 2000

January 6, 2000
PO Box 3597
Soldotna, AK 99669

N.P.F.M.C

North Pacific Fisheries Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501-2252

Dear Council Members,

I have been a citizen of Alaska for 24 years. I have fished the oceans and rivers every summer to harvest halibut and salmon for the sustenance of my family. Over this period, the regulations on private citizens' access to and use of these resources have become increasingly restrictive.

The resources of Alaska belong to the people who live here. They are not the property of commercial fishing interests who then decide what meager portion of fish the people will be "allowed" access to. The amount of halibut caught by "the people" to feed their families is a fraction of the *wastage* of the resource due to commercial trawler bycatch alone.

Next month you will decide whether or not to decrease the halibut bag limit for sport anglers fishing from charter boats. If you do this, I believe that restrictions on sport anglers fishing from private boats will follow shortly. This will serve no useful purpose and will likely result in widespread civil disobedience of the regulations.

I urge you to reject any attempt to decrease the bag limit for sport anglers no matter who owns the vessel they fish from.

Sincerely,



Michael A. McIsaac

N. Pacific Fisheries Management Council
605 W. 4th Ave #306
Anchorage Ak 99501-2252

Dear Sirs:

Urgently request you give consideration to NOT reducing recreational halibut fishermen's quota to one fish. Considering that the halibut resource is in a healthy state, one fish is not fair to the Alaskan or tourist who is trying to fill a freezer or take some fish back to the lower 48.

Instead, how about keeping the commercial fishermen away from the closer in waters where recreational halibut fishermen go? This would be good for the resource and the fishermen. The commercial fellows would still have plenty of productive water that the average recreational fisherman can't even get to.

Sincerely

Henry M. Warren

HENRY N. WARREN

PO BOX 770848

EAGLE RIVER AK 99577

Tele 696-2294

RECEIVED
JAN 11 2000
NPFMC

GAS-N-GO

PO BOX 671372
BIRCHWOOD AIRPORT
CHUGIAK, ALASKA 99567

Phone 688-6901

January 08, 2000

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JAN 11 2000

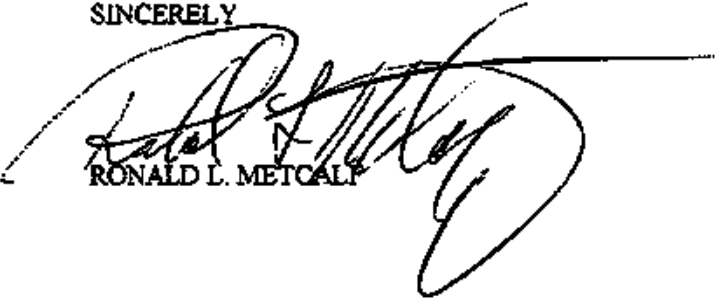
NORTH PACIFIC FISHERIES
MANAGEMENT COUNCIL
605 W. 4th AVE SUITE 306
ANCHORAGE ALASKA 99501-2252

N.P.F.M.C

Dear SIRs

AS A RESIDENT OF THE STATE OF ALASKA . I AM CONCERNED THAT YOU ARE
CONSIDERING LOWERING THE HALIBUT LIMIT FOR SPORT FISHERMEN TO ONLY ONE FISH PER
PERSON AND WITH LAUNCHING FEES . FUEL I AM ADAMATLY OPPOSED TO ANY LOWERING OF
THE CURRENT LIMIT WITHOUT CONSIDERING OTHER OPTIONS SUCH AS CUTTING THE AMOUNT
OF CHARTERS BOAT OPERATORS AND/OR CUTTING THE LIMIT OF THE COMMERCIAL BOAT
OPERATORS BY A EQUAL AMOUNT AS THE PURPOSED CUT FOR SPORTS FISHERMEN.

SINCERELY


RONALD L. METCALF

RECEIVED

JAN 12 2000

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

NPFMC

I have lived in Alaska for over forty years now and have been a commercial fisherman for the past thirty-two years. While I am mostly a salmon troller, I do have a halibut quota in area 2C that makes up about thirty percent of my income. We depend on it immensely because it allows us to catch up after being without much of an income throughout the winter months. Without it, the financial make up of our livelihood would be a disaster. I have been self employed in this industry since grade school and have always worked hard to make a living.

We have endured many cut-backs and season changes, and though I am not against other user groups using the resource, it is very hard to watch as a new user group keeps coming in and asking for more without showing any signs of restriction or conservation on their part. I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, I would like to see you stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Excluding the halibut charter harvest from abundance based management is poor public policy and doesn't give the charter operator any incentive for conservation. This, in turn, undermines the state's credibility. Abundance based management has been a corner stone of a successful management program.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest, since this was a generous compromise by the Council in 1997 that allowed for reasonable growth.

Your consideration of this letter is appreciated. To make our commercial fisheries unviable would destroy many of our communities and destroy many jobs throughout Alaska.

Sincerely,

David L. Axmaker

DAVID L. AXMAKER

P.O. Box 301

PETERSBURG, AK 99833

Post Office Box 752
Pelican, Ak. 99835

July 10 -00

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Ave., Suite 306
Anchorage, Ak. 99501

RECEIVED

JAN 12 2000

Honorable Rick Lauber,

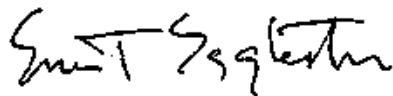
N.P.F.M.C

I have been fishing the eastern Gulf for 30 years. I have raised two sons, who are also fishermen. The halibut fishery provides about half of our income. Income we have invested in, buying more quota shares, because we believed the IFQ system is a sound and effective way to provide the consumer with a product we are proud of.

For the commercial fleet there is an economic check and balance taking place every year within the fishing industry. We operate on a yearly basis, never knowing beyond a year or two what is going to happen to the quota, or prices, politics, etc. This keeps most of us from overextending ourselves, and we accept this aspect of our business.

The idea that a user group be granted a fixed number of pounds that does not change, as the other groups allocations do, seems absurd. I support granting the charter fleet the percentage of the allocation already agreed upon in, I believe, 1997.

Thank you for your consideration,



Ernest Eggleston

January, 9 2000

Dear Chairman Lauber, North Pacific Fisheries Management Council

I am a commercial halibut skiff fisherman from southeast Alaska. I am also a practicing shipwright for over twenty years, mostly doing wood repair on commercial fishing vessels. Most of our repair work is for small independant family owned boats that fish in southeast.

I have been impacted by the alarming growth of the guided sport fishing industry. First, by the local impact of over-fishing within day charter range of Sitka. Second, from less boat work due to the impact fleet wide of more competition for a limited resource and a lost degree of optimism for the future stability of commercial fishing.

I believe everyone should bare the responsibility for stewardship of our resources and that fisheries management should always be abundance based. I feel that 125 % of 1995 harvest levels for guided sport halibut is fair and allows the charter industry to adjust to limits based on abundance.

I hope you will also consider the broad impact of this decision on those who depend on a healthy commercial fishing fleet. Thank you for your attention to this matter.

Sincerely,

Terry Perensovich

Terry M. Perensovich
506 Baranof St.
Sitka, AK 99835
907-747-5108

cc: Governor Tony Knowles, State of Alaska

RECEIVED
JAN 12 2000
N.P.F.M.C

Box 393
Wrangell, Ak 99929

January 2nd, 2000

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

RECEIVED

JAN 12 2000

N.P.F.M.C

Dear Councilmen and women:

I am a crewman who works on a commercial halibut boat. I also have an investment in IFQ's. The income from this fishery is a large part of my income and helps maintain my household here in Wrangell.

The quota shares that I participate in the catching of was earned by myself. Both from my participation in the fishery and from the expenditure of hard cash. To have the charter fleet walk off with the fruits of my labor would be an injustice of the highest magnitude. If these people want more fish, have them buy them just like I did!

Thanks,



Stan Guggenbickler
F/V Dorothy

January 9, 2000



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

RECEIVED

JAN 12 2000

N.P.F.M.C

Dear Mr. Lauber,

Sport fishermen of Alaska look forward to the development of a comprehensive management plan of all of Alaska's halibut fisheries. The guideline harvest levels being proposed for Alaska's guided halibut sport fishery range, are unrealistically low. We do not support adoption of a guideline harvest level for Alaska's guided halibut sport fishery given the small sport catch and overall abundance and harvest in Alaskan waters, and high percent of commercial by-catch wastage and mortality.

The current plan pits commercial fishermen against sport fishermen and does nothing to address the real problems with Alaska's halibut fisheries. These problems surfaced one year after the implementation of the IFQ program. **Decision makers in this arena need to recognize that a gauntlet of commercial halibut longline gear 8 months out of the year in front of ports such as Sitka have caused a serious "localized depletion problem"**. The longline commercial fishermen would have you believe that this problem is being caused by the guided sportfishery. Two years of logbooks from the guided sportfishery will bear evidence that the guided sportfishery are not the cause of the serious "localized depletion problem". Localized is defined as waters immediately adjacent to the community, such as Sitka Sound which is adjacent to the community of Sitka.

Abundance of halibut since the low point in the 1970's has rebounded some 300%. Commercial harvest has increased proportionately, however sport bag limit has remained constant at two fish per day per angler. Guided halibut sport fishery should not be based solely on a percentage of the commercial harvest level. The sport bag limit has not increased proportionately with stock abundance. The halibut bag limit should remain two fish per day of any size for both non guided and guided anglers.

Until the commercial halibut fishery can significantly reduce their 21% figure of mortality and by-catch wastage to less than 10%, we believe the halibut sport harvest level should be set to provide for enough resource for both guided and unguided sport anglers to always insure an uninterrupted sportfishing season - absent of annual possession limits. Halibut are a public resource belonging to all the people of the United States. Access to this resource by the public should not be impinged on by the greed of the commercial fishery.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Weiser".

Theresa Weiser/Owner & Vessel Operator

January 7, 2000

RECEIVED
JAN 12 2000
N.P.F.M.C

To: North Pacific Fishery Management Council
605 West 4th Avenue Ste 306
Anchorage, AK 99501-2252

From: Tony K. Hillegeist 907-346-1233
10900 Glazanof Dr. hillegeist@gci.net
Anchorage, AK 99516

Subject: Halibut Charterboat Management and GHL

North Pacific Fishery Management Council Members,

I don't really know where to start. I couldn't believe what I was reading in the Anchorage Daily News paper of December 11, 1999: "a moratorium on any more boats becoming halibut charters."

Five years ago I decided that I wanted to get into the halibut charterboat business. A small operation to take out four to six people. Boating and fishing is something I enjoy more than about anything. I have had a fair amount of boating experience on my own small boat, and have made a number of trips out on halibut charterboats, as well as a number of trips with friends. I checked with other charterboat operators and the Coast Guard about the licensing requirements for a small charterboat.

After talking to the local Coast Guard office in 1995, I set out to complete the 360 days of boating experience I needed, with the last 90 days of experience boating on the local area waters. I bought a 25' cabin cruiser in 1995 and have boating every summer since. I operate my boat out of Whittier, in Prince William Sound. I have gone out of my way to get out on the water as much as possible and have logged 30 to 40 days every summer, while working my regular full time job.

For my ten years in the U.S. Navy (seven years of sea duty assignments, including small boat qualification), the Coast Guard would give credit for half of the 360 days of experience that I need. As of this past summer I completed the required number of days I need to sit for my OUPV license exam. My plan was to get qualified to captain my boat myself, without hiring a captain. I guess, had I known that a moratorium on new halibut charterboats was in the works, I could have hired a licensed captain to run my boat over the last three or four years and captured a fishing slot the same way others have; however I didn't know of the possibility of a new charterboat moratorium.

I hoped to ease into the halibut charter business this coming summer on a part time bases, and prepare myself to work it on a full time bases. I obtained an Alaska Business License, a 1999 Sport Vessel License, and the ADF&G 1999 Registration, and had planned to start up on a part time bases this past summer, however I was not able to complete the required 360 days, in time, to take the Coast Guard OUPV license exam for the 1999 season. I will sit for my OUPV license this spring.

Additionally, I have taken available courses from the Coast Guard Auxiliary, such as the Advanced Coastal Navigation course, to help me prepare for my charter business. I am presently in the process of joining the Coast Guard Auxiliary, which will allow me to take additional training, and a chance to help other boaters.

I certainly don't have the background in fishery management that you have. I am just now reading and getting up to speed on the halibut fishery issues. It looks like your job is a thankless one, where it is hard to completely satisfy everyone, Commercial Fisherman, Charter operators, and sport fisherman. I wish I had been more on top of this issue over the last couple of years, so I could have been more involved with your process. My education is in earth science, oceanography, and mapping which has allowed me to evaluate and monitor non-renewable natural resources for a number of years. Everywhere I have worked, the harvest of the natural resources has been open to everyone and every company on equal bases. If you want to get in, big or small, you are given an equal chance. At least this is the case in the United States.

One thing is clear to me; most of the input and comments you receive are from the people that are already in the business in one way or the other, and I understand why they would like to keep out new competition. A moratorium to keep new boats out of the fishing industry will only provide protection for the people that are not operating a sound business, and who hope that government protectionism will allow them to raise their prices. I know I am not the only one that is in this position. I hope you will consider the small number of us that have been working on getting into the charterboat fishing business for the past several years. Please to not lock us out of the halibut charterboat business with a moratorium.

The other loser in the case of a moratorium will be the sport fisherman who, I believe, will not be able to afford the increasing price of access to fish for halibut. I can see the need for possible restrictions on the catch on both commercial and charter/sport, when it is necessary. After reading several of the papers that are available on your web site such as the "Update on Analytical Design of the Halibut GHL/ Moratorium Analytical, and the Proposed Halibut Guideline... Discussion Paper, I can see that there are a number of other options that can be implemented to control the halibut population. I hope new technology will reduce the by-catch numbers. It seems like there is room for improvement in this area as well.

Thank you for taking the time to consider this opinion. I hope these comments will be constructive in your final decision on this subject.


-Tony Hillegeist

1-10-2000

James E. Sampson
PO Box 670347
Chugiak, AK 99567

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

RECEIVED

JAN 12 2000

N.P.F.M.C

Dear Sir:

I'm extremely concerned about the proposal to limit Charter Boat Halibut catches at a time when I'm repeatedly told there are abundant stocks of Halibut. I do not use Charter Boats, but I have depended on halibut for part of the family's yearly meat supply since 1977. I attain that by sportfishing out of a 12 foot zodiac. I'm told sportfishing (which includes myself) makes up 15% of the total halibut catch. Why is there no representation for this percentage? Is there also an adequate awareness by the Fisheries Council of the positive economic impact Charter Boats have in regards to the tourism industry?

I'm sure you can understand how the average Alaskan must question the bias of such a decision. I seldom write letters, but feel I must contact legislators requesting sportfishing representation on the Fisheries Board so that 'subsistence' rights (which is what I consider my halibut sportfishing to be) will be protected.

Sincerely,


James E. Sampson

cc Terry Garcia, Asst. Secretary NOAA
Governor Tony Knowles
Senator Ted Stevens

Bert Maupin
P.O. Box 100877
Anchorage, Alaska
99510-0877
Phone (907) 563-1233
Jan. 11, 2000

RECEIVED

JAN 12 2000

N.P.F.M.C

North Pacific Fisheries Management Council
605 W, 4th Ave., Suite 306
Anchorage, AK 99501-2252

To Whom It May Concern:

It is our understanding that the North Pacific Fisheries Management Council is to meet to discuss the management of the halibut fishery off of the coast of Alaska. It is also our understanding that there is a proposal being considered, by the Council, to reduce the present sport catch limit of two fish per day, per angler, to one fish per day, per angler. Though we, as sports fishermen, may not have all the information possessed by the council, we see this 50% reduction as tantamount to destruction of the various charter boat operations. Last time I went halibut fishing, the cost of the charter was \$125.00 per person. No doubt the cost is more now. To pay that price for, ~~maybe~~, one fish, of doubtful size, plus the cost of travel, is out of the question! No doubt the commercial interests would like very much to see the consuming public forced to purchase their halibut from retail outlets. As for some of us, we'd boycott the species in protest. And furthermore, if I were a tourist, I would certainly give considerable thought to giving up deep fried halibut as a menu staple; or even coming to Alaska.

As I sit here writing this letter, I have no exact information as to what segment of the various fisheries, take what portion of the total halibut catch. No doubt that information is available. But I strongly suspect that the various commercial fisherman by far and away take the greater percentage. Then, of course, there's by-catch, that hot button issue.

If there isn't enough halibut, I would wonder why a hatchery program isn't being considered? As I recall, halibut are presently being farmed in Greenland.

We would like to plainly state that we vote against any proposal that would reduce the sport catch from the present two fish per day, per angler.

Thank you for your time and consideration.

Sincerely,

Bert Maupin
Agnes Magby

Richard Plerson

January 11, 2000

RECEIVED
JAN 13 2000

N.P.F.M.C

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

Dear Mr. Lauber:

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stay with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

My family and I depend on the commercial halibut fishery for 90% of our annual income. The halibut fishery provides sustainable jobs and benefits many Alaska businesses such as grocers, repair shops, airlines, restaurants, theatres and gas stations. I have invested heavily in IFQ, my boat and gear because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and everything that I own that makes it possible for me to catch halibut (boat, gear etc.). It will also make it more difficult to pay for the IFQ that I have purchased in order to make a living for my family.

Everyone who relies on a sustainable resource for a living understands the need for abundance based fishery management and accepts the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Linking the charter harvest to abundance based management is good public policy and will give the charter operators incentive for conservation. Please, don't abandon abundance based management.

I support North Pacific Fishery Management Council keeping the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

Commercial fishing provides many jobs in local Alaska communities and a cash flow that touches both private industry and our state and federal government. Your consideration of this letter and what I have said, is very much appreciated. Thank you.

Sincerely,

Thom Tomrdle F/V Cape Spencer

Thom Tomrdle
PO Box 698
Kenai, AK 99611

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JAN 13 2000

N.P.F.M.C

1.8.99

Rick Lasher
NPFMC

605 West 4th Ave. Ste 306
Anchorage, Alaska 99501-2252

Dear Rick -

I've been encouraged to send you this letter by the Halibut Coalition. I support granting a percentage of allocation based on abundance & historical levels.

I have a small ITQ and don't have much to ~~lose~~^{lose} one way or the other but feel strongly that the charter fleet needs more control - perhaps even a limited entry system (never thought I'd ever say that). Also, more control or count ought to be taken as to how much fish is caught. No one knows how much halibut is really taken by charter operators and Sport fishing men.

Hope you had a nice holiday - Happy
New Year

dc Gov. Knowles

Paul Hillmar
730 Gold St
Juneau, Alaska
99801

Dear Chairman Labor and NPFMC

1/10/00

I Am an Alaskan Fisherman who has been involved in the halibut fishery for 23 yrs. I Am concerned about the effect the explosive growth of the halibut charter industry is having on Alaskan Subsistence, local sport and commercial fishermen. I Am also concerned about local depletion of halibut and other ground fish such as lingcod in areas of heavy charter activity.

I support a GH of 125% of the 1995 Halibut charter catch based on abundance for the halibut charter fleet. This was a generous compromise that allowed for reasonable growth.

I support a Area wide moratorium for the halibut charter fleet. I believe entry should be given only to those who can prove active participation and economic dependence. Allowing every boat that bought a business license into the fishery would be allowing unlimited growth. Without a moratorium I think the Council can count on the charter fleet being back in a few yrs. and starting this process all over. I don't think anyone wants that.

I support bag limits and annual angler limits for non residents to help charter operators stay within the charter GH.

I do not support a fixed allocation to the charter fleet. I believe all user groups should share in conservation.

I do not support the "stair step" allocation to the charter fleet which still does not link the charter allocation directly to abundance.

I do not support banking unharvested charter halibut in a sport fish reserve. This would not address concerns of local depletion in areas of heavy charter fishing.

Halibut consumption in the U.S. has increased in recent years. Halibut made the "top 10" list of seafood consumed by Americans in 1998. The halibut fleet and seafood industry provide access to this public resource to millions of Americans. The millions of Americans who just want a healthy meal and either have no desire or can't afford to come to Alaska to catch a halibut. I think if the longline fleet can provide this service

responsibly they should be allowed to continue to provide Americans Access to this public resource.

Many Alaska Fisherman invested heavily in the I.F.Q. System because of the stability promised by the government. I have spent \$600,000. (Spent but not paid for) buying I.F.Q. Allowing unlimited growth in the halibut fishery at this point by a new commercial user group (halibut charter) would be a financial disaster for myself and many other halibut longline fishermen.

I support the Charter fleet GHL of 125% of the 1995 charter catch based on Abundance adopted by the Council in 1997.

Beyond that I support converting the Charter GHL to I.F.Q. This I.F.Q. should be transferable between longline and charter interest. This would allow the American consumer to determine the allocation based on their willingness to pay for the goods and services offered. This would also be a fair way for the longline and charter fleet to resolve the allocation dispute.

Thanks for your time,

Dick L

RECEIVED

JAN 13 2000

N.P.F.M.C

DICK CURRAIN
P.O. Box 1336
SITKA, AK. 99835

JANUARY 9th, 2000

HONORABLE RICK LAUBER, CHAIRMAN
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
605 WEST 4th AVE, STE 306
ANCHORAGE AK 99501-2252

RECEIVED
JAN 13 2000
N.P.F.M.C

I AM WRITING TO OPPOSE A FIXED ALLOCATION FOR THE GUIDED SPORT HALIBUT CHARTERS. IT'S JUST NOT FAIR TO FAVOR A RELATIVELY NEW USER GROUP OVER AN OLDER WELL ESTABLISHED + MANAGED USER GROUP.

I AM THE ONLY COMMERCIAL FISHERMAN IN SEAGWAY AND I HAVE A SMALL QUOTA. I SELL ALL MY FISH OFF MY BOAT TO THE GENERAL PUBLIC (CATCHER/SELLER) AND IT'S THE ONLY SOURCE OF HALIBUT FOR SEAGWAY'S LOCAL RESIDENTS. IF MY QUOTA GETS CUT THEN MANY PEOPLE (INCLUDING SENIORS) WON'T GET ANY HALIBUT FOR THE YEAR UNLESS THEY AIR FREIGHT IT FROM JUNEAU.

FROM MY OBSERVATIONS IN SEAGWAY, MOST OF THE CHARTER SKIPPERS ARE FROM OUT OF STATE AND THEIR CLIENTS FROM OVERSEAS WITH VERY LITTLE MONEY STAYING IN TOWN. I SEE A NEW INDUSTRY TRYING TO REPLACE AN EXISTING ONE.

I CAN UNDERSTAND SOMEONE TRYING TO MAKE A NEW BUSINESS FOR THEMSELVES BUT NOT TO PUSH AN EXISTING INDUSTRY OUT. WHEN THE ABUNDANCE OF HALIBUT IS DOWN, IT IS SIMPLY NOT RIGHT TO LET THE CHARTER BOATS ENJOY A STABLE HARVEST LEVEL WHILE I HAVE TO TAKE A BIG HIT TO MY INCOME. I'VE LIVED IN ALASKA 22 YEARS AND I HAVE PAYMENTS + A FAMILY TO SUPPORT. WHEN ABUNDANCE IS DOWN, BOTH GROUPS SHOULD SHARE EQUALLY IN THE CONSERVATION OF THE RESOURCE.

SINCERELY

Mark Selde

MARK SELDE BOX 282 SEAGWAY AK 99840

RECEIVED

JAN 19 2000

N.P.F.M.C

Gary A. Rogers
8222 Wilcox
Anchorage, Alaska 99502

January 10, 2000

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

Dear Sir or Ms:

Please do not include guided, unguided or recreational or sports fishers in a halibut allocation plan with the commercial fleet. Reducing non-"commercial" take of halibut to one fish per day from the current two fish is unreasonable and discriminatory.

I use halibut to feed my family. To me it is more of a "subsistence" resource than a sporting entertainment.

Just because I live and work at a non-commercial fishing occupation in Anchorage does not mean I am any less of an Alaskan than anyone else.

Just because I hire a halibut charter in order to catch my halibut does not mean I need the resource any less than anybody else!

Last time I checked, the natural resources, including the fish and game resources of the State of Alaska were for ALL Alaskans, equally - not just some of the resources for some of the people to exploit for a lousy buck!

Sincerely,


Gary A. Rogers

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JAN 13 2000

N.P.F.M.C

F/V Ocean Cape
Douglas Neal
3624 - 104th place S.E.
Everett , Wa. 98208
January 9, 2000

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

Dear Sir ;

I am writing to you to voice my concerns with the Alaska sport charter fleets attempts to re-allocate more halibut to them than what was agreed to by the North Pacific Fishery Management Council in 1997.

My family and I depend on the commercial halibut fishery for the major part of our income. This halibut fishery provides the majority of our crewpersons wages as well. I have invested in the L.F.Q. system by mortgaging our family home and buying \$185,000 worth of quota shares. I also bought into the government sales pitch on stability of the fishery and built a new vessel for \$300,000. I am also one of 350 members in Seafood Producers Cooperative who has built a cold storage plant in Sitka ; which has to be one of the major employers in Sitka. These proposals would destroy the economic basis of this plant.

Although , I now live in Washington state; I was born and raised in Alaska. I can remember what the fishing fleet in Juneau looked like both before and after Juneau turned its back on it. In recent years that has all changed. With Taku Smokeries and Alaska Glacier Seafoods buying quota fish; Juneau is benefiting greatly from the longline fleet. This not only helps the local economy but has improved the employment as well. During two of my deliveries our halibut were graded by work release workers from Lemon Creek. This employment has to be a help to their situation too.

All of this will disappear if the state of Alaska turns and destroys the longline fleet by accepting the charter fleets requests. In Juneau, people say that when a person retires from the Dept. of Fish and Game; they either become a charterboat operator or move to Montana. This might be humorous at the office but to us fishermen they are supplementing their state retirement with our jobs and the high profile lobbying is quite apparent.

The longline fleet fishes almost 100% of the areas open to them, spreading the effort out equally in the area. The charter fleet concentrates its effort close to its base of operation (town) and is doing this seven days a week from daylight til dark. This type of fishing is destroying the opportunity for local sports fishermen to catch a fish as well.

The State of Alaska will not come out ahead if it decides in favor of the charter halibut fleet; you will be trading existing jobs for new jobs and destroying the people who have fished for years.

Sincerely,

Douglas R. Neal

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JAN 13 2000

N.P.F.M.C

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th AVE., Ste.306
Anchorage, AK 99501

I have been commercial fishing for halibut for the last 20 years and I am greatly concerned over the possible charter fleet allocation of halibut. As you well know the charter fleet has been growing at a rapid pace for the last ten years. I strongly urge you to stick with the decision you made in 1997. Please stick to the historic catch levels that the charter fleet made prior to 1995. It is not the job of already established fisheries to support new or growing fisheries. Limited entry was put into effect for a reason and the same thing needs to happen to the charter fleet. A plan needs to be developed to stop the wildly growing charter fleet and also to control the current charter fishermen.

I do not feel it is right for a new fishery to come in and knock out or cripple a traditional fishery in such a way that the historical fishery is no longer viable or greatly hindered. I watched this happen with the commercial troll fishery in SE Alaska. I trolled for salmon for over 20 years and just last year I quit trolling and started gill netting. Why did I leave a profession that I loved and made decent money at? The charter fleet started getting their piece of the pie of king salmon and basically put me out of business. Just last year the commercial trollers in Alaska were only allowed 5 days to fish king salmon during the month of July!

This same type of fate is going to happen to the commercial halibut fishery in Alaska if drastic measures aren't taken to control the halibut catch by the charter fleet. If the amount of money I make from halibut fishing drops by 20%-40% then this may well cause me to sell out of fishing altogether. I've worked in the commercial fishing industry for 26 years and at this time I own a 42 foot fiberglass vessel. I sure hope my retirement isn't spent sitting on the beach watching out of staters catch fish that I use to. I've been a resident of Alaska for 32 years and all the money I make is spent in Alaska!

Sincerely,
Brian Merritt
Brian Merritt
F/V Sharlene C

CC: Governor Tony Knowles
State of Alaska
Box 11001
Juneau, AK 99811

PO Box 401
Wrangell, AK 99929

January 11, 2000

RECEIVED

JAN 13 2000

N.P.F.M.C

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

This letter is to urge you to stick by the council decision made in 1997 to keep the halibut charter allocation at 125% of the 1995-harvest level. It is absolutely necessary that this number work with the very successful abundance based management system that has kept the halibut fishery sustainable and productive for so long.

I am an Alaska resident and lifelong commercial fisherman. Halibut longlining accounts for approximately 50% of my yearly income. I have personally invested heavily in the IFQ program with loans from the State of Alaska, Division of Investments, which are backed with my boat and permits as collateral. My boat and permits have a lien against my home. I also have an owner-financed loan on IFQ's from a retired commercial fisherman who resides in Sitka.

I tell you this in hopes of showing how deeply invested and ingrained the commercial halibut fishery is in the local Alaskan economy. Not to mention all of the local services and businesses dependent on halibut dollars.

Besides fishing halibut with my own vessel, I crew on other halibut boats. Some of these crew jobs secure my position as a crewman in other fisheries, so maybe halibut is responsible for even more than 50% of my yearly income.

Another important aspect of the commercial halibut fishery I would touch on is the people who are provided with a meal of halibut each year who cannot afford to catch their own. Millions of people enjoy a meal of halibut because of the efforts of commercial halibut fishermen!

In closing, thank you for your consideration of this letter and giving me the opportunity to express how the commercial halibut fishery is bound into the very fabric of our local communities and the State of Alaska.

Sincerely,



Robert T. Mosher
F/V Patience
1116 Slim Williams Way
Juneau, AK 99801
(907) 789 -7588

Copy. Gov Knowles ROPE
to Gov Lauber
Long Delegation

January 6, 2000

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

RECEIVED

JAN 13 2000

N.P.F.M.C

Dear Chairman Lauber,

I have been a halibut longliner in Alaska since 1983. I believe that the present IFQ program does work well! I hire crew, but when school is out my two teenage girls and wife are my help for a part of the summer. Since IFQ's, my wife and children and myself have each borrowed and invested more into IFQ's feeling confident that it was a good sound program essential for our fishing future! Any council action that would reduce quota to the long line fleet for reasons other than conservation would be harmful to a long time committed Alaska industry and result in reallocation to groups, such as the charter fleet, unjustly.

We, the commercial fishermen and women of Alaska provide a public resource for and to the vast majority of the American people who cannot afford the time nor money of a sport fishing vacation, an opportunity to have Alaskan fish on their tables for a very reasonable cost.

The State of Alaska CFEC has compiled statistics stating total permit and crew license holders totaled 37,255 people in 1997 for a gross earnings of \$970,873,570. In excess of \$37,000,000 in 1998 from fisheries business and resource landing taxes was paid to the Alaska Department of Revenue. This does not include cold storage, wholesalers, retailers, shipping companies, restaurateurs, employment wages and taxes generated to the state and nation from all of the Alaska commercial fishing industry.

The North Pacific Fishery Management council should keep the charter allocation at 125% of the 1995 harvest, a very generous allocation.

It is imperative that the Council fairly protect and maintain one of the state's largest work and revenue sources, Commercial Fisheries!

Sincerely,



Robert S. Fredrickson

F/V New Day
617 Kattian St., A-11
Sitka, AK 99835

Copy: Governor Knowles
Lt Gov Ulmer
Cons Delegation

File

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

January, 9, 00

Dear Mr Lauber,

The charter halibut fishery must be managed by historical catch data and current abundance. The decision you made in 1997 to establish halibut quota should be adhered to. Management tools must be established to maintain this catch quota.

As an IFQ commercial halibut fisherman, abundance based management has always dictated my harvest quota. This abundance- based system must be the management tool for all user groups to be effective and fair. The NPFMC must retain the allocation of 125% of the 1995 harvest, which allows for reasonable growth.

The risk and commitment required to qualify and participate in the existing IFQ has been large. The economic investment by commercial fishermen who believe in the effectiveness of the IFQ system has been large also. Please consider the charter halibut fishery part of the historical management program.

Our family derives 70% of our income from the IFQ halibut fishery . We find it unacceptable to ignore the uncontrolled threat of the charter halibut fishery to dilute our lively hood.

Sincerely Yours,

Quentin Seager f/v Mindalina

RECEIVED
JAN 13 2000
N.P.F.M.C

JANUARY 12, 2000

RECEIVED

JAN 14 2000

N.P.F.M.C

MR. RICHARD LAUBER
605 W. 4th #306
ANCHORAGE, AK. 99501

DEAR MR. LAUBER:

WITH REGARD TO THE PROPOSED REDUCTION IN THE NUMBER OF HALIBUT CAUGHT BY SPORT FISHERMAN, I HAVE SEVERAL COMMENTS.

1. IF THE CATCH IS REDUCED TO ONE HALIBUT PER PERSON PER DAY, NO ONE IS GOING TO SPEND THE MONEY TO SPORTFISH FOR HALIBUT. FISHING A WHOLE DAY FOR ONE FISH ISN'T ANY FUN. IT DOESN'T MAKE ANY SENSE AT ALL.

2. ON A PER POUND BASIS, A SPORT CAUGHT HALIBUT BRINGS MORE MONEY TO THE STATE'S ECONOMY THAN A COMMERCIAL CAUGHT HALIBUT. IN OTHER WORDS, SPORT FISHERMEN SPEND LOTS OF DOLLARS IN ALASKA!

3. I AM AN ALASKAN AND THE HALIBUT ARE A PUBLIC RESOURCE. I WANT A FAIR SHARE OF THE HALIBUT. THE COMMERCIAL FISHERMEN ALWAYS WANT ALL OF THE FISH, AND ARE ALWAYS COMPLAINING ABOUT NOT MAKING ANY MONEY. IN MY OPINION A GOOD NUMBER OF COMMERCIAL FISHERMEN SHOULD LOOK FOR SOME OTHER KIND OF WORK. FROM NOW UNTIL INFINITY THERE ARE NEVER GOING TO BE ENOUGH HALIBUT TO SATISFY THE COMMERCIAL FISHERMEN.

4. RETAIN THE LIMIT OF TWO HALIBUT OF ANY SIZE FOR SPORTFISHING!

VERY TRULY YOURS, Bob Elliott

RECEIVED

JAN 14 2000

Dear: Rick Lauber

N.P.F.M.C

I'm a commercial fisherman who holds IFQ in 2C and counts on income from that to support myself and my family. Last year it ended up being about 25% of my total gross income and next year it will be more.

I am more than a little concerned about a fixed poundage for charter boats even when the total allowable catch goes down. This seems very unfair and confusing since Alaska has always managed their fisheries on abundance or lack thereof.

I recently purchased some additional IFQ to watch charter boats don't have to purchase at all. I'm in favor of the North Pacific Fishery Management Council keeping charter allocation at 25% of the 1995 harvest since it was a most then fair compromise by the council in 1997.

I would request that the NPFMC drop consideration of the fixed poundage allocation because I believe this to be

→

a very poor president to set
a lot of good hardworking
people who live in Alaska and
elsewhere count on Halibut to
make a living and in some
cases the additional income is
the difference between coming
out ahead or breaking even.

appreciate your Friend

Ed Jasper

FV CAROL ANNE

Ed Jasper
1613 Wetmore Ave
Everett, WA. 98201

Rick Lauber, Chairman
North Pacific Fishery management Council
West 4th Ave, Suite 306
Anchorage, AK 99501-2252

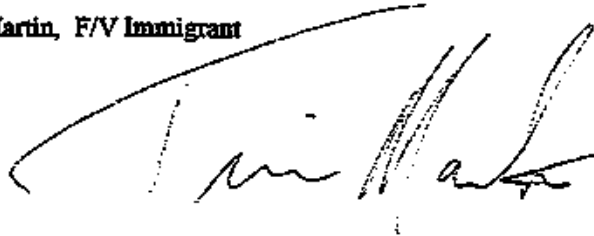
Dear Mr Lauber,

I support granting the charter fleet a percentage allocation that is based on their historical participation and abundance. The decision made in 1997 on charter allocation should be honored.

I am the owner/operator of the F/V Immigrant. I have been fishing for halibut commercially for 21 years and depend upon halibut for nearly 50% of my income. In addition I have three crewmen who also are similarly dependent upon halibut to support their families. We purchase nearly all of our supplies in Alaska and contribute to the local economies. We have invested approximately \$200,000 in IFQ purchases, most of which we still owe. A fixed poundage allocation for the charter businesses would severely affect our ability to repay those loans.

We have happily shared in the sacrifices required to rebuild the halibut stocks to their present high level and feel we should now be able to share in the present abundance. With a fixed poundage scheme the charter fleet has no incentive to share in the conservation efforts to protect the resources. I believe the charter fleet should be held to the 125% of the 1995 harvest decision. In recent years the charter fishery has become a "meat fishery", with many clients shipping home hundreds of pounds of halibut, far in excess of any "sport" needs. I have even heard some of these "sportsmen" boast that they were able to sell some of this fish at home to pay for the costs of their trips. The fishery is being abused and it's time it was stopped. The possession limits for the charter fleet should be lowered as well. Thank you for your consideration. I hope the council has the fortitude to take action.

Tim Martin, F/V Immigrant



MARTIN / NOEL, INC.
51 ASPEN DRIVE
ELLENSBURG, WA 98926

January 8, 2000

Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.


My family and I depend on the commercial halibut fishery for 50% of our income. My wife and I have invested heavily in the IFQ system because of the stability promised by the government. I have been fishing for 27 years with the same vessel to support my family. With the implementation of IFQs we have purchased a larger vessel to provide a future for our two sons in what we were convinced would be a stable fishery under the IFQ system. Stability and equity in the fishery also impacts the market for boats in a positive direction and could be conducive to the sale of our first longliner.

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

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

I appreciate your consideration of this letter. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,



Mark A. Halverson
1701 46th Ave NE
Olympia, WA 98506-1919

January 8, 2000

North Pacific Fishery Management Council
Attention: Mr. Rick Lauber
605 West 4th Avenue, #300
Anchorage, Alaska 99501

RECEIVED

JAN 14 2000

N.P.F.M.C

Dear Mr. Lauber:

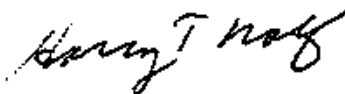
I hold approximately 7,000 pounds of 3B-D halibut shares. My complaints with the current block system are as follows:

1. It's becoming increasingly unsafe to fish halibut.
2. The canneries in Area 3B will only buy halibut when the salmon season is closed.
3. The above forces a small boat to fish in rough weather, or sit and wait until the weather comes down.
4. Due to the time factor, I find myself and others are taking a higher risk to harvest their quota shares.

I would sell my D-class shares and replace them with C-class but there is virtually no market for D class in 3B. The local small boat fleet has been gradually replaced with larger boats. I have been presented with two offers to sell, in both cases the buyers were trying to steal them.

To increase the safety of small boat halibut fishing, I am requesting the council adopts the fish up proposal for area 3B. This proposal will allow myself and others to fish their D-class on a class C vessel.

Sincerely,



Harry T Nolf
R. D. 4, Box 4328
Duncannon, PA 17020

RECEIVED

JAN 14 2000

Scott Seaton
PO Box 111
Talkeetna, AK 99676

N.P.F.M.C

Dear Mr. Lauber,

I think you should stay with the 1997 decision that gives the charter fleet a percentage based on abundance & historic levels. You should also establish management strategies to keep this fleet within their allocation.

A fixed allocation proposal unfairly penalizes my family when stocks are in a decline. We depend financially, in large part, on fishing our 3A halibut IFQ's. **I have invested about \$200,000 in IFQ's, secure in the knowledge that there was a long history of stable management and that allocations were "abundance based"**. As a twenty year Alaskan commercial fisherman, this fixed charter allocation proposal appalls me! Our Alaska runs are healthy because we have always managed with abundance based management. We have shared both the pain and gain as stocks fluctuate with other user groups and I see no reason to change this.

This proposal would put the guided sportfish industry as the priority user of halibut over subsistence users, commercial users, and local sport users. In addition it gives the charter fleet no incentive for conservation as they know their halibut will come out of my allocation!

I sure don't want to see our State or Federal managers or give a priority to the guided industry through **"fixed or stairstep allocations"** over all other user groups. It flies in the face of Alaska's management policy of "abundance based" management for all user groups. I don't think it is the place of ADFG to propose both an allocation and attempt to prioritize a particular user group for our fishery resources.

As to the argument that the charter fleet might have trouble adjusting to changes in harvest levels, it hurts all user groups when stocks decline. I am certainly not exempt, but **please don't make me bear all the pain of stock declines while exempting the charter fleet!**

In conclusion, I think that you should keep the charter allocation at 125% of 1995 harvest since this compromise allowed reasonable growth.

Remember, most of us commercial halibut fishermen are smaller operators and mostly state residents who have depended on the halibut resource to support our families for many years. I'm sorry to take so much of your time, but this issue is very important for us local fishermen.

Sincerely,


Scott Seaton

Copy: Governor Tony Knowles, Box 110001; Juneau, AK 99811-0001

Mike Hopley
~~POB 4273~~
~~Seldotna, AK 99669~~

Jan. 12, 2000

Richard Lauber
321 Highland Drive
Juneau, AK 99801

RECEIVED

JAN 14 2000

N.P.F.M.C

Richard,

I'm writing this letter in regards to the proposed GHL and reduction of halibut bag limits for the guided recreational fishermen in the Halibut regulatory area 3A. I do not support either a proposed cap nor a reduction in the daily bag limit of guided recreational sport fishermen. Given the overall, strong health of the halibut stocks in 3A and the increased limits for all IFQ commercial fishermen over the past few years, I see no biological reason, at this time to reduce the daily bag limits nor implement a GHL on the guided recreational sport fishery as advised from the International Pacific Halibut Commission. The reasons for my position on this proposal are many including

- 1) all recreational anglers have always supported conservative management of our halibut resource and fair and reasonable access to the resource for all users, including recreational.
- 2) I do not support a guideline harvest level for Alaska's guided halibut sport fishery at this time given the inequality in the small sport catch (14%) compared to the commercial catch of (74%) when considering the overall healthy halibut stocks. The GHL level being proposed is unrealistically low (ranges from 4.7 to 6.2 million pounds) given that this is a public resource and given that the commercial bycatch amounts to about 12 - 14 million pounds, much more than the total sport fish industry as a whole. The last 3 years alone, the commercial longliners opportunity to harvest increased by 50%, while the sport fisherman's opportunity remained the same, fixed at two fish.
- 3) The halibut resource has rebounded by 300% since the low abundance of the 1970's. During this time the sport bag limit has remained at 2 fish and has not increased with stock abundance. Today this sport bag limit remains the same, 2 fish per day.
- 4) The guided and unguided sport catch should be removed from the total available harvest before commercial bycatch and waste. Bycatch and waste are products of commercial fisheries and we should not be held accountable for this waste.
- 5) Any GHL level adopted should be a set level and not abundance based. In 1975 sport anglers accepted a decrease in bag limit to 2 fish per day in response to stock conservation concerns. Since that time the resource has rebounded 300%, with the commercial harvest increasing proportionately with stock abundance. The halibut sport fishery has never been abundance based and should not be at this time to help longliners pay for their increased harvests over the years.

6) Our local economy on the Kenai Peninsula is dependant, to a great extent on tourist, and the sport fishing industry. To have a thriving economy we need to continue to attract tourist and sportfishers to our area. To place further restrictions on our guided sport fishery by implementing a GHL or reducing the daily limit from 2 halibut to 1 would be disastrous for the overall health of our economy.

We look forward to participation in development of a comprehensive management plan for all of Alaska's halibut fisheries in a forum which has representation from the sport fishing industry. The current forum, proposed by commercial fishermen for their benefit only pits commercial fishermen against sport fishermen and does nothing to address the real problems with Alaska's halibut fisheries. Thank you for your time.

Regards,



Mike Hopley
Owner/Operator Alaskan Adventure Charters

2
Perry Flotre
ARCTIC TERN CHARTERS
P.O. Box 1122, Sterling, AK 99672
Phone/FAX: 907-262-7631
Email: ATCFC@KENAI.NET
www.AlaskaOne.com/ARCTERN

RECEIVED

JAN 14 2000

N.P.F.M.C

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

11 January 2000

Dear Chairman Lauber, (Please provide each NPFMC member with a copy of this letter, thank you!)

My name is Perry Flotre. I am an Alaska resident and currently own and operate a sportfishing charter business on the Kenai Peninsula. While the majority of my business is assisting nonresident sportfishers, approximately 30% of my business is provided to local Alaskans. Although the Alaska Salmon is what usually draws people to the Kenai Peninsula for the first time, it is the Halibut which keeps them coming back. This is for several reasons; however, the more important are that they are available the entire season, relatively easy to catch, and they are great to eat. Without exception, my repeat sportfishers are drawn by Halibut.

I am very concerned with the proposal to change the sport caught limit from 2 fish per day to 1 fish per day. It would obviously impact by client base as they are primarily visiting

Alaska to fish. However; beyond that, I have other concerns that I think you as a NPFMC Council Member should understand:

1. My Logbooks indicate that we release approximately 1.9 halibut for each one kept. Our clients are encouraged to release all halibut under 20#. I suspect that if clients are only allowed one fish that the release rate will go to 4 or 6 for each fish kept. Whatever the mortality rate is associated with the catch and release of Halibut, it will undoubtedly increase to double or more.

2. Sportfishers accepted a 2 fish per day limit in 1975 due to abundance concerns. Since that time, abundance has increased some 300% and the commercial harvest has increased proportionately. To share the bounty, the sportfisher should have had their limit raised approximately 8 fish per day; however the NPFMC, for whatever reasons, chose not to do so and kept the entire increase, every pound, for the commercial fishers. Now that the abundance is in decline, it is proposed that the sportfisher take a 50% decrease (although they never shared in the increase) while the commercial fishers take a 25% decrease of the 300% increase they received. No logical thinking can find fairness in this action.

3. The sport catch (both unguided and guided) as well as other non-commercial removals must be subtracted from the total available harvest before the categories of commercial bycatch and commercial waste. The sport and subsistence harvesters do not contribute to or benefit from these allocations. They were specifically designated for and are used by the commercial

fishery. These categories, especially bycatch, are directly attributable to the commercial fishery and should be removed only from the commercial fishery allocation.

4. The proposed 50% reduction will not appreciably reduce the number of pounds harvested. It will however encourage all sportfishers to target larger fish (spawners) and certainly increase release mortality due to increased releases.

In closing, I think those who choose to sportfish for their own halibut, be they unguided or guided, should have a reasonable set level and not be jerked around annually with an abundance based limit. They have never received the benefit of increased abundance and therefore certainly should not be penalized for decreased abundance.

Thank you for your time and attention.

Sincerely,



Perry Flotre

To Whom It May Concern
This is regarding the ghl proposal:

1. First of all, recreational anglers support conservative management of our halibut resource and fair and reasonable access to the resource for all users, including recreational, as we have since 1975.
2. We do not support adoption of a guideline harvest level (ghl) for Alaska's guided halibut sportfishery at this time given the small sport catch and overall abundance and harvest in Alaskan waters.

The guideline harvest levels being proposed for Alaska's guided halibut sport fishery range from about 4.7 to 6.2 million pounds. These levels are unrealistically low given that this is a public resource and given that the commercial fishery takes 62,000,000 pounds, bycatch amounts to about 12 to 14 million pounds and there are several million additional pounds wasted annually in conduct of commercial fisheries. The low ghl levels proposed by commercial industry and adopted by the Council will not provide fair or reasonable access to non-commercial users. For example, during the last three seasons alone, commercial longliners opportunity to harvest increased some 50% while the sport fishermen's opportunity remained fixed at two fish. Decreased halibut abundance projected for 2000 would immediately put the guided sport harvest over proposed ghl levels. The result: the commercial set line fishery would be reduced according to recommendation by International Pacific Halibut Fishery (IPHC), (-20-25% in 2000), while guided sport anglers opportunity would be decreased by 50% (to one fish) to help pay for overharvest by the commercial sector. **THIS IS NOT FAIR!**

3. Since the low point of halibut abundance in 1970's, abundance has rebounded some 300% and commercial harvest has increased proportionately. During this same time, the sport bag limit has remained constant at two fish per day per angler and has not increased proportionately with stock abundance. As such, Alaska's sport anglers never had the opportunity to "share the gain", from increased stock abundance, as did commercial interests. Sport anglers should not be obligated to "share the pain" when stocks decline - because they never had the opportunity to share the gain! The sport halibut bag limit for both nonguided and guided anglers, should remain two fish per day of any size. Non commercial public uses should receive a higher percentage of harvestable fish during times of decreased abundance, such as is provided for king salmon in the Southeast Alaska Chinook Salmon Management Plan.

4. The guided halibut sport catch must be removed from overall CEY (total available harvest) along with other non-commercial removals **BEFORE** commercial bycatch and waste. Bycatch and wastage are products of commercial fisheries and recreational users should not be held accountable for this loss of resource. Further, sport fisheries have no influence on market factors considered by the International Pacific Halibut Commission. Thus, a ghl for the guided halibut sport fishery should not be based solely on a percentage of commercial harvest level.

5. Any ghl level adopted should be a set level and not abundance based. Sport anglers accepted a decrease in bag limit to two fish per day in response to stock conservation concerns in 1975. Since the low point of halibut abundance in 1970's, abundance has rebounded some 300% and commercial harvest has increased proportionately. During this same time, the sport bag limit has been consistent at two fish per day per angler and has not increased proportionately with stock abundance. The halibut sportfishery has never been abundance based and shouldn't be changed to an abundance based fishery at this time only to help longliners pay for their increased harvests over the years.

6. Sport fishermen would look forward to developing a comprehensive management plan for all of Alaska's halibut fisheries in a forum which had representation from sport users. The current exercise, proposed by commercial fishermen for their benefit only pits commercial fishermen against sport fishermen and does nothing to address the real problems with Alaska's halibut fisheries.

Thomas J. Lange
"COOKIE" LAKE FISH
CHARTER
P.O. BOX 1722
SEWARD, AK 99664

REF: AK SPORTFISH COUNCIL

JAN 14 2003

RECEIVED

N.P.F.M.C.

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

RECEIVED

JAN 14 2000

N.P.F.M.C.

Dear Chairman Lauber:

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides an allocation based on 125% of the 1995 charter fleet's harvest. A set allocation for one commercial group - charter boats - while the other commercial group - long liners - absorb all reductions in quota, is a sure formula for the demise of the commercial halibut long line fleet.

The IFQ program as implemented by the council has resulted in an orderly fishery. The ability to buy and sell quota has resulted in substantial investments by many of the participants in the halibut IFQ fishery. A council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to the fleet, and in many cases, the loss of a family business.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

~~REDACTED~~
I have fished halibut as a crew member since 1989 + depend on that income for part of my fishing season. I believe the charter boat should accepted limited growth as the commercial fleet has.

Sincerely,

Paul Olson

DEAR RICHARD LAUBER

1-14-2000

I AM WRITING THIS LETTER IN CONCERN TO THE UP COMING DECISIONS BY THE N.P.F.M.C. REGARDING REGULATORY ACTIONS ON THE HALIBUT CHARTER INDUSTRY IN SOUTHEASTRAL ALASKA.

I UNDERSTAND THAT YOU'VE PROBABLY HEARD ALL THE ARGUMENTS CONCERNING THIS ISSUE, AND WILL CAREFULLY TAKE THESE INTO CONSIDERATION WHEN MAKING ANY FINAL DECISIONS. RAMPATION FROM A 50% REDUCTION IN BAG LIMITS WILL BE FAR MORE REACHING THAN JUST THE IMMEDIATE AFFECT ON THOSE OPERATING THE CHARTER VESSELS AND THERE CLIENTS

MANY OF OUR COASTAL COMMUNITIES WILL BE GREATLY IMPACTED BY THESE ACTIONS.

LETS ALL WORK TOGETHER ON SOMETHING THAT WILL WORK FOR ALL USER GROUPS.

THANK YOU FOR YOUR TIME AND CONSIDERATION.

RECEIVED

JAN 18 2000

N.P.F.M.C

Richard Bates
PO BOX 895
HOMER, AK 99603

Honorable Rick Lauber Chairman
N.P.F.M.C.
605 W. 4th Ave Suite 306
Anch. AK 99501-2252

RECEIVED
JAN 14 2000

N.P.F.M.C

Dear Mr Lauber,

I am a 2-C, IFQ holder and I'm very concerned about the allocation of a percentage of my quota, which I invested quite heavily in, to the charter fleet which has no investment but boat and advertising. They also have a right to make a living but their allocation should be based on historical levels of harvest and abundance of the resource.

My families income is very dependent on halibut. I've crewed in the fishery since 1975 and wasn't allocated any QS, so I bought in. It was a substantial investment for a working man but worth it to keep me in the business where my skills lie. I'm willing to take reductions in QS based on abundance, but it rubs me the wrong way to give it up

to another user group just because they want it.

The charter fleet can take reductions, when the stocks are low, just like the rest of us.

Thank you for listening to my views.

Sincerely
Andy Massey
F.V. "Tia Lynn"
4121 Blackerby St.
Juneau, AK
99801

Dear Chairman Lauber, North Pacific Fishery Management Council

On the eve of this historic meeting in which the council will decide how to allocate halibut to the charter industry, please consider the viewpoint of the resource.

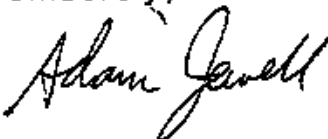
The pride of the halibut fishery is that it has sustained fishing for decades, and I encourage you to take measures to keep it a sustainable resource. A sustainable resource is more profitable to everyone who harvests halibut, whether with a fishing rod or with groundline. It is my view that the IFQ quota system will improve the sustainability of the halibut fishery because commercial catches now fluctuate with the abundance of halibut. Why wouldn't ADF&G recommend a quota for the charter industry that fluctuates with abundance? This is a good question that they should be asked. It is just unethical to guarantee the charter industry a fixed quota and then decrease the commercial fisherman's quota because there are fewer halibut.

This will be a historic meeting because the council has the opportunity to plot a new course for fisheries, one where sustainability of the fishery is the foremost issue.

The council should take the position that the charter fleet and the longline fleet will be governed by the same type of management, one based on abundance and not fixed quotas.

Thank you for your time, and I hope the meeting is successful.

Sincerely,



Adam Jewell
F/V Hoser II

RECEIVED

JAN 18 2000

N.P.F.M.C.

Phone 907-826-3597
Fax 907-826-3597

RECEIVED

JAN 18 2000

January 09, 2000

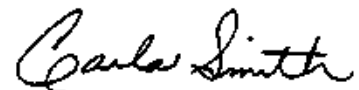
Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK. 99501-2252

N.P.F.M.C

Dear Chairman Lauber,

I am writing this letter in support of granting the charter fleet a percentage allocation based on abundance and historic levels, as opposed to the ADFG sponsored option to grant them a fixed or stair stepped allocation in pounds, which is not directly linked to abundance. This proposed option by ADFG is contrary to Alaska's management principles and undermines the State's management authority. Not to mention just plain old fashioned unfounded and unfair. The commercial IFQ halibut fisherman has either earned his quota shares by years of hard work and dedication, or he has purchased them. We are good stewards of the resource, and willingly adjust to changes in the allowable catch. Unfortunately, I can say neither about the charter fleet, which, incidentally has a 97% non-resident clientele rate. My family in particular has invested heavily in the halibut fishery, even to the point of purchasing a 50 foot steel boat last year to fish them from. I don't know what will become of us if the proposed ADFG option is adopted. We may lose everything. I don't think we could repay our loans. It goes without saying how devastating the trickle down effect of this would be on our local economies. I strongly believe that abundance based management has been a corner stone of a successful management program, and it would be very unwise to abandon it. The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth. I appreciate you considering my letter, and trust you will do what is right and fair. Thank you.

Sincerely,



Carla Smith

F/V ILONA B



P.O. Box 1175 ♦ Craig Alaska 99921 ♦ USA
Phone 907-826-3597 ♦ Fax 907-826-3597

RECEIVED

JAN 18 2000

N.P.F.M.C

January 13, 2000

Honorable Rick Lauder
NPFMC
605 West 4th avenue, ste. 306
Anchorage, AK 99501

GHL and the charter fleet

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation. This is the only fair and equitable answer to the proposed option by ADFG to grant them a fixed or stair stepped allocation in pounds which is not directly linked to abundance. The commercial IFQ halibut fisherman has either earned his quota shares by years of hard work, dedication, and investment, or he has purchased them outright. We, the commercial halibut IFQ fisherman, have proven ourselves to be responsible stewards of the fishery and have fished under rules adopted by the IPHC since 1923. Definking the halibut charter harvest from abundance based management is poor public policy, undermines the state's credibility, and gives the charter operators no incentive for conservation.

My family has invested heavily in the commercial halibut fishery. We have added substantially to our initial pounds. In fact we went so far as to purchase a large steel boat last year to fish them with. I have a mentally handicapped son who would never be suited for working in the charter industry, but we always felt could find a niche in the commercial aspect of the fishery. As you can see, to support a plan that includes the charter industry not based on abundance would be a great hardship (and injustice) on my family, on our communities, and on our state at large.

I strongly believe that abundance based management is the foundation of a sound and successful management program, and it would be unwise to abandon it. The NPFMC should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth. I appreciate you considering my letter, and trust you will do what is fair and just.

Sincerely,



Keith W. Brady

January 12, 2000

Chris and Tamara Evens
PO Box 886
Petersburg, AK 99833

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

RECEIVED

JAN 18 2000

N.P.F.M.C

Dear Chairman Lauber:

This letter is in reference to the allocation of halibut issue that has halibut longliners such as our family worried sick. We support the decision you made in 1997 that held the halibut charter fleet at a fixed percentage of the quota.

Our family just invested a huge amount of money in halibut IFQ's. We have no problem with the guided halibut industry having a percentage of the halibut quota, but awarding them a **fixed** quota seems unwise. In years of low quotas, commercial fisherman would suffer grossly; especially if they have fishing loans to pay. Lowering the commercial harvest would hurt our family since halibut fishing is 50% of our income.

We appreciate your consideration of this letter. Commercial fishing is the backbone of our community and provides jobs for many.

With Respect,

Chris & Tamara Evens

Chris and Tamara Evens

January 12, 2000

North Pacific Fishery Management Council
Mr. Richard Lauber, Chair
605 W. 4th Ave #306
Anchorage, Alaska

RECEIVED

JAN 18 2000

N.P.F.M.C

RE: Proposed Reduction In Halibut Sport Fishing

Mr. Lauber:

This letter is to voice my strong concern and complete objection to the current proposed reduction of sport caught halibut allocations. Furthermore, I completely reject any changes in season length and/or bag limits to the sport fishing regulations of halibut in Alaskan waters.

In addition, I do support and urge you to adopt the practice of including halibut by-catch as part of the commercial fisherman reaching their allocation quota. I am also adamantly against raising the commercial fishermen quota even if the sport fishing allocation remains the same. I also demand that positions on the council include sport fishing representation.

As the regional council which oversees the ground fish stocks of Alaska and in accordance to the Magnuson Act, I implore you to carry out allocation issues so that they are fair, equitable to all fishermen and so that no one particular individual, corporation or other entity acquires an excessive share of such privileges.

A Concerned Fisherman & Voter,



David T. Blackburn
1129 N. 75 East
Centerville, Utah 84014
801 324-3787



1600 Duke Street
Suite 220
Alexandria, VA 22314
Phone(703) 519-1714
Fax(703) 519-1716
E-Mail:naco@wpa.org
Web:www.charterboat.org

January 10, 2000

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

RECEIVED

JAN 18 2000

N.P.F.M.C

Brian K. Legans
Executive Director

Bob Zales, II
Panama City Boatmen Assn
Chairman

Ed O'Brien
Maryland Charter Boat Assn
Vice Chairman

Tom Luchinski
Chicago Sportfishing Assn
Secretary

Ron Maglio
Michigan City Charterboat Assn
Treasurer

Member Associations

Black River (NY) Charter Guides Assn
Cape Cod (MA) Charterboat Assn*
Cape May (NJ) Charter Boat Assn
Captains (NY) Boatman Open & Charter Boat*
Central Basin (OH) Charterboat Assn
Charterboat Assn of Puget Sound (WA)
Chicago (IL) Sportfishing Assn*
Connecticut Charter & Party Boat Assn
Deep Creek (AK) Charter Boat Assn
Desha (FL) Charter Boat Assn
Florida Guides Assn
Genesee (NY) Charter Assn
Golden Gate (CA) Fisherman's Assn
Greater Point Pleasant (NJ) Charter Assn*
Gulf Coast Charters of Crystal River Florida, Inc.
Honor (AK) Charter Assn*
Iwaco (WA) Charter Assn
Juneau Charterboat Operators Assn
Kaska! Ocean Recreation Industry Assn
Kenosha (WI) Charterboat Assn
Key West Charterboatman's Assn
Lake Erie (OH) Charter Boat Assn*
Lake Michigan (MI) Sportfishing Assn
Lake Ontario (NY) Charter Boat Assn
Lodington (VA) Area Charterboat Assn
Marathon (FL) Guides Assn
Maryland Charterboat Assn*
Michigan Charter Boat Assn*
Michigan City (IN) Charterboat Assn*
Mississippi Charter Boat Captains Assn*
N. California Assn of River Guides
N. Shore (NH) Charter Captains Assn
NE (WA) Charter Boat Captains Assn
Niagara County (NY) Charter Fishing Assn
North Coast (OH) Charter Boat Assn
North Fork (NY) Captains Assn
Panama City (FL) Boatmen Assn*
Pennsylvania Lake Erie Charter Capt. Assn
Pensacola Charter Boat Assn, Inc.
Petersburg (AK) Charterboat Assn
Pleasure Island (NC) Fisherman's Assn
Port Aransas (TX) Boatmen, Inc.*
Port Isabel (TX) Guides Assn
Professional Capt.'s United of NY
Sandusky (OH) Charter Boat Assn
Siles (AK) Charter Boat Operators Assn*
United Boatmen of MI & NY
Valdez (AK) Charterboat Assn
Virginia Charter Boat Assn*
Waukegan (IL) Charterboat Assn

*Member NACO Board of Directors

Dear Mr. Lauber:

The National Association of Charterboat Operators (NACO) is an association of over 4000 charterboat owners and operators located from Alaska to Maine. We take an active role in national issues affecting the charterboat industry. Many of our members are based in Alaska. It has come to our attention that your Council has proposed to create separate bag limits, line limitations, and other discriminatory measures regulating the recreational charterboat fishery. These proposed regulations are targeting the halibut fishery which is at a high level of abundance and one where the recreational fishery is only allowed 9% of the overall TAC.

The for-hire industry (charterboats) is simply a vehicle to provide recreational anglers access to recreational fisheries. Recreational allocations and/or quotas include recreationally caught fish from all recreational anglers. Creating different regulations for recreational anglers fishing from charterboats is discriminatory and is also in violation of National Standard 4.

We urge you to reconsider your proposal and allow all recreational anglers equal regulations. We understand fishery management is an extremely difficult task, but suggest that creating different regulations for the same user group is divisive and only makes management more difficult. Should you have any comments or questions, please contact us.

Thank you,


R.F. Zales, II
Chairman

Cc:
Hon. William M. Daley, Secretary of Commerce
Hon. Tony Knowles, Governor, State of Alaska
Hon. Ted Stevens, U.S. Senate
file

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

RECEIVED

JAN 18 2000

RE: Upcoming action on Sport Charter in Area 3-A

N.P.F.M.C

Dear Chairman Lauber and Council Members:

We are the owners and operators of Tim's Trips Charter Service in Kodiak, Alaska. We have been actively in business since late June of 1998. We are concerned that if a moratorium is implemented, our date of business may not be early enough to include us within the fleet. Over the last two years, we have invested all our financial resources and also incurred substantial debt in custom-constructing and outfitting our 30-foot aluminum charter boat specifically for this business, and in completing the other details necessary to create a top-flight charter operation. Our business has taken off very successfully, and since entering the charter fishery, we have been consistently busy with charter customers during the summer fishing seasons.

Now we are threatened with a moratorium that may put us out of business. We feel that it would be manifestly unfair to cut off a thriving, high-quality operation that has been in business for two successful years. In good faith and with hard work, we have invested our resources in creating a business that is a credit to ourselves, to Kodiak, and to Alaska. There is no need for it to be destroyed.

Because Kodiak presents a unique situation, we support the creation of a separate management area subdividing Kodiak into Area K as a local area management plan. Kodiak does not fit the profile of the Lower Cook Inlet area, which has a large charter fleet and over 40,000 charter fishing clients. Kodiak has a much smaller charter fleet and nowhere near as many fishing clients. Furthermore, Kodiak's charter season begins later than that of Lower Cook Inlet, which would mean that if they share a GHL, a significant part of that harvest limit would be taken in Lower Cook Inlet before Kodiak really gets started. For these reasons, Kodiak's situation is very different, and lumping Kodiak with the rest of Area 3-A would be unfair to Kodiak charter operators.

Obviously, the charter fishing situation in Kodiak is very different from that in the rest of Area 3-A. Creating a separate LAMP for Kodiak would allow the implementation of appropriate controls in Lower Cook Inlet without creating economic hardship for Kodiak. If a GHL must be set, certainly Lower Cook Inlet and Kodiak should be viewed independently. Additionally, we do not think that a moratorium is necessary for Kodiak, but if there must be a moratorium, it only seems fair that it be prospective rather than retroactive. Have it deter new operators from entering Kodiak's fleet, rather than excluding those of us who have already made the investment.

Thank you for your attention.




Timothy J. Tripp
Margaret L. O'Leary-Tripp
Tim's Trips Charter Service
P.O. Box 3614
Kodiak, AK 99615 (907) 487-2529

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

RECEIVED
January 12, 00
JAN 18 2000
N.P.F.M.C

Dear Mr Lauber,

The charter halibut fishery must be managed by historical catch data and current abundance. The decision you made in 1997 to establish halibut quota should be adhered to. management tools must be established to maintain this catch quota.

As an IFQ commercial halibut fisherman, abundance based management has always dictated my harvest quota. This abundance- based system must be the management tool for all user groups to be effective and fair. The NPFMC must retain the allocation of 125% of the 1995 harvest, which allows for reasonable growth.

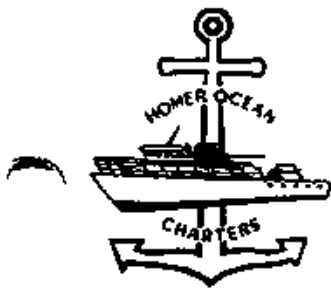
The risk and commitment required to qualify and participate in the existing IFQ has been large. The economic investment by commercial fishermen who believe in the effectiveness of the IFQ system has been large also. Please consider the charter halibut fishery part of the historical management program.

Our family derives 70% of our income from the IFQ halibut fishery. We find it unacceptable to ignore the uncontrolled threat of the charter halibut fishery to dilute our lively hood. Upon attending the recent IPHC meetings and seeing the expected charter catch I find my reasons for concern are justified. If the charter catch were to share fish from the IFQ system by becoming holders of quota this unfair dilution of our IFQ fishery would not occur.

Sincerely Yours,

Quentin Seager c/v MINDALINA

Seager
8714 54th Pl. West
Mukilteo, WA 98275



HOMER OCEAN CHARTERS

Box 2543 • Homer, Alaska 99603

Sea Witch **SOURDOUGH**

VESSEL CHARTERS

(907) 235-6212 • <http://www.xyz.net/~hoc/>

January 11, 2000

NPFMC
605 W 4th Avenue STE 306
Anchorage, AK 99501

RECEIVED

JAN 18 2000

Dear Chairman Lauber,

N.P.F.M.C

I am writing to express my concerns about the impending North Pacific Fisheries Management Council (NPFMC) actions to limit growth in the Alaska halibut charter fishing industry. It is my belief that the measures they are considering will destroy the charter fishery and have a major negative impact on tourism in Alaska.

While I understand that the halibut fishery has been historically commercially directed, that is because the public demand for access to the fishery has been limited. I am of the opinion that fish in federal and state waters belong to the public and their access to the fisheries should be given priority over special interest groups utilizing the resource for personal profit. As charter operators, we provide transportation services for the public to access the fishery; we are not as you would be led to believe commercial fishermen. Efforts to restrict the public's access to the fishery via charter boats while the commercial waste exceeds the public's harvest are asinine. Methods being considered including a poundage cap for charters (a reenactment of a failed policy that led to commercial halibut IFQs), and a one fish per person limit (charter industry decimation while technically not limiting charter growth which is the point of the measure), are examples of poor policy making and violations of the Magnuson act. These are the people's fish and restrictions to public access should be biologically driven.

This being said, I realize that with the current make up of the NPFMC, that it is not a question of whether or not the public's access to the fishery should be limited, but just a matter of how they can limit it to best benefit commercial interests. I don't agree with the need for any action, but since they are determined to take some, they should seek a solution that is not detrimental to commercial fishing or tourism. I have often heard, don't come to me with problems; come to me with solutions, so here is mine.

The NPFMC is determined to curb the growth in the halibut charter industry, they are determined to consider halibut charters commercial fishermen, they are determined to use their guideline harvest level (GHL) as a cap to the amount of fish the public can catch while on charter boats, and for some reason it seems they are hell-bent on finding a way to destroy the charter industry in the process. The solution for the commercial fishery was the creation of IFQs, why not do the same for charters?

1). The frame work for the IFQ system is in place, a new system of limitation does not need to be created or enforced. Active charters have been keeping log books for the past two-year, catch figures (although inaccurate) are available or could be in the near future.


2). The NPFMC can use their GHL, or a percentage that is fairer to the public, to base the charter allotment on. We are in effect capped achieving their goal.

3). Established businesses can continue at their present level of operation. Business growth can occur if we choose to purchase more IFQs from others, new entrants are allowed access to the industry by the purchase of IFQs. Charters come away with something material instead of just a limitation. Charters should be allowed to purchase commercial IFQs and vice-versa.

4). Tourism in Alaska is not negatively impacted nor is commercial fishing.

My purpose in writing is to ask you to use your considerable influence to support this concept and help provide a win-win solution for Alaskans and the American public. Thank you for your time and continuing efforts on behalf of Alaska.

Captain Roark Brown
Homer Ocean Charters
PO Box 2543
Homer, AK 99603
e-mail: hoc@xyz.net

A handwritten signature in black ink that reads "Roark Brown". The signature is written in a cursive, slightly stylized font.

January 15, 2000

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JAN 18 2000

N.P.F.M.C

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

Dear Chairman Lauber,

This letter opposes any action by ADF&G and the N.P.F.M.C. that would provide a fixed poundage allocation for the halibut charter industry. Commercial halibut fishing is about 1/2 of our fishing gross income. After the I.F.Q. System of management went into effect, we made the decision to purchase additional quota shares to more than double what we were allotted. We made this investment because of the stability now promised by the government. We had confidence in the resource, the management, and our ability to access it. Reallocating that poundage to the guided halibut charter industry would be unfair.

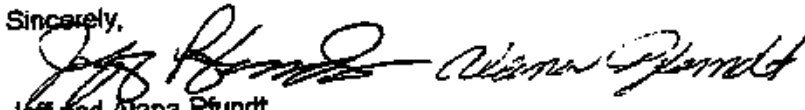
For the halibut fishery we employ three crewmen, all with young families. Their earnings support their families and flow into the economy of Petersburg. The halibut fishery provides many jobs in our community and benefits many businesses.

We have no argument with our resident sport fisherman and subsistence users getting the fish they need for personal use. We do take the exception to the "fixed poundage allocations" as suggested by the ADF&G to be granted to the guided halibut charter industry. This allocation advocacy by ADF&G Sport Fish Division is contrary to state policy. Alaska's abundance based management principles would be undermined by a fixed or a stair stepped allocation based on pounds. Establishing a priority preference for a charter industry would be unfair and harmful to the commercial longline industry. Also such priority preference would be a detriment to local sport and subsistence users. A constantly expanding and demanding charter industry who continually hammer all the favorite fishing holes would deplete availability for local residents.

Commercial fishermen have been responsible stewards of the halibut fishery and have followed the rules adopted by the International Pacific Halibut Commission since 1923. Separating the halibut charter harvest from abundance based management is poor public policy, gives those in the charter industry no incentive for conservation and undermines the State's credibility. Abundance based management has been the basis for a successful management program and it is not wise to abandon it. Therefore, please ask the North Pacific Management Council to drop consideration of the "fixed poundage allocation" since this option goes against fundamental management philosophy.

Thank you for your consideration of this letter. Commercial fishing is vital to the economy of so many of our local communities and therefore vital to the state of Alaska.

Sincerely,


Jeff and Alana Pfundt
P.O. Box 855
Petersburg, Ak 99833

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JAN 18 2000

N.P.F.M.C

From: Richard Breda-Seman
1661 W. Dredid W
Glendale, Az 85224

to: Whom it concerns
Subj: Halibut Limit

1) Based on your decision/pending decision to limit the halibut catch to one/day, our group of six has decided to cancel what would have been our 15th trip to Alaska. The Canadian lodges now offer a better deal, so we are (now forced to) considering spending our money there.



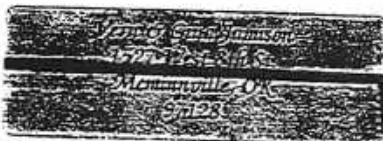
Dear Sir,

Tuesday January 11,2000

I commercial fish Halibut. I have concerns I would like to express to you. I have recently purchased Halibut IFQ's through the NMFS loan program. Our government has a great program designed to help purchase IFQ's, helping to secure a better future for fishing families. Although it was necessary for my boat to be put up as collateral , I felt the risk was minimal. I now have a substantial investment in this fishery. Concerning the Commercial Halibut Charter Fishery, I support giving them a percentage based on a system of historical levels and stock abundance. The north pacific fisheries management council should stay with the decision that was made in 1997 and put together an effective management tool to keep the charter fleet within their designated allocation. Reducing the commercial harvest will reduce the value of the IFQ's I just purchased with borrowed money and in turn will make repaying this loan very difficult. The government led us to believe there would be stability in our fishery with the implementation of IFQ's. By removing the Halibut charter harvest from abundance based management would be a total failure in policy making that will result in substantial hardship on the commercial fishing families who work to feed this country. The charter boat harvestors have shown little incentive to conserve the Halibut resource. Knowing that their numbers were increasing dramatically over the last few years ,they choose to sit back and push the burden of conservation on the IFQ Holders. never making any attempt to constrain their ever increasing number of boats. Time is past due for them to share in conserving this valuable resource. By placing them into the abundance based management system will provide the necessary management tool needed to prevent over harvesting the resource. The North Pacific Management council should keep the charter allocation at 125% of the 1995 harvest,thus resulting in more than a fair compromise by the council in 1997 that allowed a reasonable amount of growth. This system of management would be fair to all, and appreciated not only by the IFQ holders but also the non guided sport fisherman and subsistence user alike. Thank you for taking time to read my letter, this issue is very important to me and my family.

Sincerely

Vern E. Jamison



RECEIVED

JAN 18 2000

N.P.F.M.C

Alaskan Game Fisher

P.O. Box 1127 • Soldotna, AK 99669 • email: akpt@alaska.net • (907) 262-2980 • Fax (907) 260-2676 • 1-800-320-2980



To: NPFMC
605 W 4th AVE #306
Anchorage AK 99501

From: Mel Erickson
PO Box 1127
Soldotna AK 99669

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JAN 18 2000

N.P.F.M.C

Subject: Halibut Charter Boat GHL

I would prefer an IFQ system for charter boats instead of a GHL. An IFQ system could be put in place rather quickly since there already is a system in place for commercial IFQ. It would solve the problem you are trying to address with the GHL and have more support from the charter industry than a GHL. It would not have the destructive effect on the industry as a GHL would. It would eliminate the need of LAMPS in some areas. It would solve the problem of a moratorium for overcrowded areas. Please consider this option.

Thank You,

Mel Erickson
Mel Erickson



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JAN 18 2000

N.P.F.M.C

January 12, 2000

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

Dear Mr. Lauber:

This letter is in reference to the proposed guideline harvest level for Alaska's guided halibut sportfishery which will be considered at the upcoming meeting of The North Pacific Fishery Management Council in Anchorage on February 7, 2000.

I believe history will show that sport anglers have always supported a conservative approach to management of the halibut resource in Alaska. Sport anglers willingly accepted a two fish per day limit in 1975 when the resource was considered to be weak and have continued to support the two fish limit even though the resource has rebounded to record levels and the commercial catch has increased by roughly 50%.

I believe that all users of this resource should have fair and reasonable access and that there is no justification for a 50% decrease in the daily bag limit when there is currently an abundance of halibut and no proposal to reduce the commercial catch by a proportionate amount. Particularly in light of the fact that the sport fishery did not participate in the significant increases in the harvest levels for the past 25 years.

The guideline harvest levels being proposed (4.5 - 6 million pounds) for the statewide sportfishery when compared to the commercial fishery's 62 million pounds seems unrealistically low given the fact that (1) this is a public resource and (2) the known commercial bycatch (which is more than twice the proposed guideline harvest level for the sportfishery) goes unchecked. Bycatch and wastage are products of the commercial fisheries and sportfishing enthusiasts should not be held accountable for the loss of this precious resource.

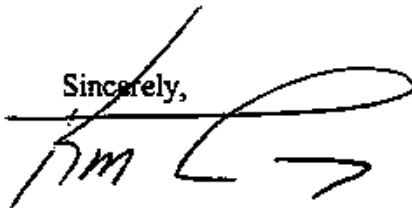
It would seem to me that reducing the sport caught daily bag limit by 50% while only reducing the commercial harvest by 20 to 25% only places a more disproportionate burden on the sport fishing sector and further limits access by various user groups to this public resource. The two fish per day bag limit has remained constant for the sport fishing sector since 1975 even though there has been a steady increase in the abundance of halibut and the commercial harvest has increased significantly.

I realize that the guided sport fishery has grown rapidly in the past few years but I also know that there is a level at which demand for these services will top out and simple economics will force many operators out of business and prevent new entrants from starting up. Supply and demand economics work the same way in the sport fishing arena as they do in the commercial fishing sector and all other businesses.

Many commercial halibut fisherman have purchased halibut quota shares at or above market values and some have incurred large amounts of debt in doing so. I think it is imperative that everyone recognize the fact that this only gives them the "opportunity", not the "right" to catch this increased amount of halibut. This resource is not and cannot be owned by the commercial fishermen. It is a public resource that must be properly managed with fair and equitable access by all user groups.

I strongly support the development of a comprehensive management plan for all of Alaska's halibut fisheries, but I cannot support, and will aggressively oppose any attempt to further restrict or reduce the harvest level of the guided sport fishery.

Sincerely,

A handwritten signature in black ink, appearing to read 'K M Thomas', written over a horizontal line.

Kirk M. Thomas
The Cedars Lodge
Silverking Lodge

RECEIVED

JAN 18 2000

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

N.P.F.M.C

I am writing to oppose the ADFG proposal to the North Pacific Management Council to allocate a fixed poundage of Halibut to the Charter fleet. The Charter fleet should be regulated under a percentage allocation based on abundance.

I have fished out of Sitka for 21 Salmon seasons and 15 Halibut seasons. My wife Mollie (she is one of the Governors appointees to the Alaska Public Broadcasting Commission) and I own a home in Sitka and have two kids in the school system. I am a 14 year member of Seafood Producers Cooperative and am a board member at present. The effects of a fixed allocation could be very detrimental to me personally, especially with the declining abundance that we are seeing this year. As abundance goes down, a fixed allocation to the Charter fleet means an even steeper decline in the remaining Halibut quota for the Commercial industry. Historically, the commercial fleet has willingly accepted controls and regulations to keep the Halibut resource healthy. I feel that it is a bad precedent and bad management to regulate the Charter fleet under a fixed allocation while the Commercial fishery shoulders the capricious swings of abundance based management. Having two very different forms of management for the same Halibut resource undermines the credibility of the managing agency. Our family derives 50% of its income from the Halibut resource. We would like to see all harvesters of Halibut regulated under the same rules.

Even though I consider myself a Commercial fisherman, I have held a Charter license for the past 13 years. I can certainly understand why a commercial Charter operator would want the consistency and stability that a fixed poundage allocation would bring. Anyone who has been in the fishing industry very long (and charter boats are a component of the fishing industry) soon realizes that the very nature of fishing is inconsistency. A fisherman can have a poor season due to lack of abundance, breakdowns, weather, or bad timing. I would love a fixed poundage of Halibut to work from. My monthly bills would be much easier to plan for if I knew exactly how much fish I could catch. Unfortunately, the resource would be poorly served during downward population swings. It is no easier for an Commercial Halibut fisherman to deal with seasonal fluctuations than it is for a Charter operator to deal with the same ups and downs. If one segment (Charter) of a fishery is able to convince the government to guarantee a fixed poundage the remaining segments (Commercial) shoulder a disproportional burden when the inevitable population downturn comes.

Ever since the ADFG Sport Fish Division made this proposal the Halibut IFQ market has been depressed. Even though the dock price for Halibut is the same as when I bought IFQ two years ago, the quota price is now down a third. The possibilities of no commercial Halibut fishery during a year of low Total Allowable Catch is causing real financial hardship for those who have bought Halibut shares in good faith.

I hope that the ADFG Sport Fish Division quits advocating during gear group squabbles and returns to its primary mission - managing fisheries for the benefit of the resource. The charter fleet should be given a percentage of the harvest. 125% of their 1995 harvest is generous to the Charter fleet and responsible to the fishery resource and all those who depend on it for a living.

Thanks for your careful consideration on this issue. Many Halibut fisherman in Sitka are quite worried about the negative possibilities this fixed poundage proposal could cause for our fishery.

Yours truly,

A handwritten signature in cursive script that reads "Charles E. Wilber".

Charles E. Wilber
f/v Alexa K

cc Governor Tony Knowles

Martins Fishing Guide Service
7720 Lotus Drive
Anchorage, Alaska 99502

RECEIVED

JAN 18 2000

N.P.F.M.C

Jan. 13th 2000

North Pacific Fishery Council
Richard Lauber (Chair)
605 W 4th Ave. # 306
Anchorage, Alaska 99501-2252

Dear Chairman Lauber, with regard to your desire to curb the sportfishing harvest of Halibut in Alaska I would like to offer my opinions on this subject.

- 1) I support conservative management of the halibut resource, we support fair and reasonable access to the halibut resource for all users
- 2) I do not support adoption of a guideline harvest level for Alaska's guided halibut sport fishery at this time, given the small sport catch, overall abundance and harvest in Alaskan waters. The commercial bycatch amounts to about 12 - 14 million pounds, twice what the range of the GHL that is being proposed for the guided sport halibut fishery. Proposed guideline harvest levels, proposed by the commercial industry, are too low and will not provide for fair or reasonable access to sport users. Just an example: The last 3 years alone, the commercial longliners opportunity to harvest increased by 50%, while the sport fisherman's opportunity remained the same, fixed at two fish.
- 3) The halibut resource has rebounded by 300% since the low abundance of the 1970's. During this time the sport bag limit has remained at 2 fish and has not increased with stock abundance. We never did share in this gain. The sport bag limit for all anglers, guided and unguided should remain the same, 2 fish per day.
- 4) The guided and unguided sport catch should be removed from total available harvest before commercial bycatch and waste. Bycatch and waste are products of commercial fisheries and we should not be held accountable for this loss of resource.
- 5) Any GHL level adopted should be a set level and not abundance based. In 1975 sport anglers accepted a decrease in bag limit to 2 fish per day in response to stock conservation concerns. Since that low abundance has rebounded 300%, commercial harvest has increased proportionately with stock abundance. The halibut sport fishery has never been abundance based and should not be at this time to only help longliners pay for their increased harvests over the years.
- 6) Under the Alaska state constitution all user groups are to share all the resources of this state in a fair and equitable manner. To break the back of one industry to further

the growth of another or to deny fair and equitable access to the resource to all Alaskans is not what the drafters of this constitution had in mind. Don't expect the sportfishermen and charter operators of this state to go away quietly leaving the Commercial longliners with free run of the resource, this will not stand.

Sincerely,

 912
Gregor P. Martin Sr.

January 14, 2000

Dear Chairman Lauber:

I am writing again about the upcoming decision about charter boat halibut share. The charter fleet should be granted a fixed percentage allocation that is based on our traditional methods of management using abundance and historic levels.

The IFQ system was a boom to us, as we age and as we deal with limited physical health. It is a safer fishery-a fishery that we can participate in as our health and as the weather dictates. Our investment in our IFQ's and in our longline boat is our retirement program. Our income from halibut fishing is over 50% of our total fishing income. We plan on leaving our other two fisheries because of health issues, so our halibut income will become our only fishing income. A change in the management policy does not provide stability to our future in the halibut industry, and could seriously effect the value of our IFQ's, our vessel, and could seriously effect the bottom line: the continuation of a sustainable fish population.

My husband, Steve Enge, has been a commercial fisherman out of Petersburg since he was 16. I've fished with him for 20 years. Our daughter began pulling her fair share this past summer. My husband and I take our roles in halibut resource protection very seriously. It is our livelihood. Why invite the potential for over-harvest? Up until now we've respected the good decisions that our Board of Fisheries and the Alaska Department of Fish & Game, the Halibut Commission, and recently the North Pacific Fishery Management Council, have made over the years in managing the resources.

We have never had a problem adjusting from year to year with changes in the harvest levels. We see no reason why guided sportfish boats cannot re-adjust as we do. We see no fairness in a fixed allocation for them. They are just as commercial as we are. It is how they make their living, just like us.

Sincerely,


Kathy Pool

P.O. Box 422
Petersburg, AK 99833
poolenge@alypen.com

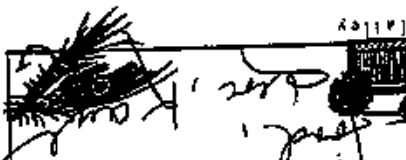
cc: Rick Lauber

RECEIVED

JAN 18 2000

N.P.F.M.C

376-8810



Dear Sir,

I am just another
 one among the men
 and women who like to
 catch hell for
 a job and feed to an
 a man and 80 years old.
 I would like to produce
 a short a trip to catch
 one job - maybe 30 days.
 Please make it
 possible for us to
 job and keep the
 about, if not, I
 may have to job
 for number two and
 a job, for the
 business person who
 a job and let us
 catch some hell.

The End of the Rainbow

Leo C. Kaye
 Veterans Wall of Honor
 HC 30, Box 12934
 Wasilla, AK 99654
 (907) 376-8810

RECEIVED

JAN 19 2000

1/13/00

The Honorable Rick Jaber
N.P.F.M.C.

N.P.F.M.C.

Dear Mr. Jaber, I am a commercial halibut fisherman of 23 years from Southeast Alaska. Halibut represents about 50% of our yearly income and is very important to make it financially here in S.E. I have purchased more Quota's, trying to build a better business. At this point I can't tell you how concerned we are about our future in halibut. a 20% decrease in 3A & 2C quotas by itself will make paying back our loans very difficult, maybe even impossible! If you throw in what the charter fleet wants cast in stone each year, it gets scarier yet.

Both my kids, Helea 16 & Jay 13 have grown up fishing salmon & halibut, & Jay would like to be a commercial fisherman when he grows up.

Mr. Jaber, I would like you to stick with the 1997 decision the council made and establish

effective management measures to
keep the charter fleet within their
allocation. Please use abundance based
fishery management. The N.P.F.M.C.
should keep the charter allocation
at 125% of the 1995 harvest.

The future of habitat for the average
consumer is also being jeopardized
by charter operators. We have
developed a good fresh fish scenario
with the longer seasons we can now
fish. Fresh fish at a reasonable
price. For the sake of the fishery,
please help us to continue this
win-win program.

Thank you for taking the
time to read this letter.

respectfully

Jeff Hendrix
E/O Capt. Rls.

Otto Florschutz
PO B 547
Wrangell, AK
99929

RECEIVED

JAN 19 2000

N.P.F.M.C

Honorable Rick Lauber
Chairman
North Pacific Management Council
605 West 4th Ave, ste 306
Anchorage AK, 99502-2252

Mr. Chairman and Council members

I ask you to support an efficacious GHL for the guided halibut industry. There is ample evidence of the detrimental effects of this overcapitalized fishery. As a highly effective commercial fishery, it is imperative we put it on even footing with the longline industry before that very important sector of our local Alaskan economy is handicapped.

One very important voice that has not been heard from enough in this debate is from the many Alaskans who supplement their income from halibut sales. Many people in our community of Wrangell have full time jobs but have also purchased IFQ to supplement their income. This holds true for all Alaskan coastal communities. Contrary to how the press and the charter industry has portrayed us, commercial fishermen are not all greedy tyrants from Seattle but are families who depend on their income from commercial fishing.

It has been apparent to me for years that there are more wealthy people who are more than willing to exploit the Alaskan fish resource through sport fishing than there are fish for them to harvest. We need only look at the Pacific Coast of Oregon, and Washington to see examples. By resisting all efforts to control and manage that fishery through much familiar claims like "if you impose fishing restrictions no one will come" that fishery and resource has been decimated. Now, as the only place left with significant fish stocks, Alaska is under attack. With battle cries like "don't limit us we're promoting economic growth", and "if you implement restrictions our customers will not come", the charter industry is leading in this attack.

Local area depletion has also become a major concern. After 17 years of fishing for crab in Icy Straits in Southeast Alaska adjacent to the community of Gustavus in June, July, and August I have seen the charter boats expand from 2 in 1984 to more than 40 now. When you do the math it's scary as heck what they catch, and it explains why locals normally come back empty handed these days. Without intervention from you on our behalf, in the future the only way local Alaskans in most communities will be able to sport fish will be to go on charter boats, which are bigger, faster and able to travel beyond the area they depleted.

The Southeast King Salmon Management plan is an excellent example of how simple restrictions work without harming the industry. The charter industry predicted complete destruction of their industry if bag limits were reduced. Now we can see that this was not so. Mike Bethers, leader of the 20,000-post card mailing, was the main opponent to reductions. He predicted, no one will come fish. Even within their own industry, they lack experience to predict results of management decisions. Good friends of mine who salmon charter fish have told me how much they like the way it turned out. They don't have to limit their customers, the regulation does it for them. This shows how well a GHIL would work.

A GHIL would first, curb the charter industry growth, second, encourage the industry to become more resource oriented, and third, help protect the investments of local Alaskan communities and fishermen.

Please support the decision made by this council in 1997 and implement an efficacious GHIL using the 1995 numbers.

Thank you. Otto Florschutz

1/16/00

Dear Chairman Lauber:

We are writing to urge that the Council grant the Charter fleet an allocation based on the abundance of the resource only. Most if not all other fisheries in Alaska are managed on an abundance basis. We all understand that it means ups and downs dictated by the health of the resource — when we invested our savings in additional pounds we knew this — it was a long term investment. We never dreamed that the Charter industry would demand a fixed allocation regardless of the health of the resource.

Our family has long lined together for 24 years — we are well aware of the ups and downs involved. Because fisheries are constantly

changing we are virtually year-round fishermen now. - realizing that by year round fishing you are providing jobs to crew members, processing workers and spending most of your earnings in your community. We hope to be able to continue this life-style, but it is scary to see politico rather than sound biology trying to influence a well managed fishery.

Sincerely,
Moe + Amy Johnson

Moe / AMY JOHNSON
423 Verstovia
Sitka AK 99839

RECEIVED
JAN 20 2000
N.P.F.M.C

RECEIVED

JAN 20 2000

January 14, 2000

NPFMC
Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

I support the harvest levels based on the catch for 1995 of the charter fleet, they are quite generous. (Did the longliners get 125% of their historic catches?)

When the harvest levels have been reached the saltwater charter fleet should be shut down. Period. Please stop massaging the rules and regulations in order to give the charter fleet "priority" consideration.

The longliners must have stability also. We pay our borough taxes, permit loans, IFQ loans, vessel payments, maintenance expense, insurance, etc. with fishing income. Longliners have invested in IFQs because of stability implied by our government in the IFQ program. Reducing the IFQ will impair ability to pay off the very investments in this program the government created...and indeed, even deny a basic living in some cases.

The longliners have been fishing long before the charter fleet existed and should have "Grandfathered" rights. Especially, since the government has given them quota shares to depend on to make a living. It's not right now, for them to change their mind and reallocate so the charter fleet can expand to a size that didn't exist before.

When we had the homestead program, and a homesteader proved up and invested heavily in their property, then when he was finished, would it be OK for the government to step in and give a percentage of his land and improvements to someone else?...because of some politician's self-interest.

This sounds like the work of our wonderful governor, Tony Knowles and his "hired guns" on the fish board, (attorney Dan Coffee, John White, etc. They pretty much ruined the salmon industry in Cook Inlet by reallocating to the "in-river" commercialized entity, (not to mention jeopardizing the nurseries and wildstock salmon themselves) Are they trying to do the same thing to the Halibut fishery?

I have a friend who has fished almost all of her life, this person bought a boat and permit and now is unable to pay for either because of mismanagement of the salmon fisheries... We need true habitat restoration (not boardwalks) and a protection plan that will ensure that southern rivers and streams cease to be a "KILLING FIELD" and instead are returned to productive salmon spawning and rearing habitat." (Sound familiar?, a partial quote by Gov. Tony Knowles, May, 1999).....

The charter fleet allocation should be kept as it is (125% of the 1995 harvest) or reduced. When this harvest level is reached, they should stop fishing.

I fish to earn a living, and most fishers that I know are certainly not rich...it's basic to their existence...basic to keeping them off the welfare rolls...sports fishing is done because it's fun. It's not a necessity...it's just fun for those with time on their hands and money in their pockets enough to afford a vacation to Alaska and an expensive charter trip...and our ability to earn a living should not be taken away from us to expand a never ending sports fishery.

Sincerely,



Grace Kendall
(commercial fisher for 25 years)
P.O. Box 2523
Soldotna, Alaska 99669

1-01-00

North Pacific Fishery management council

Attn: Mr. Richard Lauber

It has come to my attention that the halibut sport fisher is being grossly walked on in Alaska. I know that the Magnuson - Stevens act of 1996 stresses that no particular individual, group, or corporation should acquire an excessive share of this nations fishing privileges. So I must ask you to please take another look at the all time high halibut stock numbers and percent of halibut caught and discarded by commercial fishermen, compared to the percent taken by sport fishers. If you do, you will in all good conscious conclude it is very unfair as it is today. Too support reducing the bag limits or season any further shows your absolute lack of concern for the halibut sport fisher, families and business's that Survive because of it.

One concerned American,
Talking to as many others about this as possible,

Michael T. Southard
Michael T. Southard
PO BOX 237
KASLOF, AK 99610

RECEIVED

JAN 19 2000

N.P.F.M.C

January, 17, 2000
P.O. Box 870156
Wasilla, Alaska 99687

RECEIVED

JAN 19 2000

N.P.F.M.C.

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

Re: Halibut Limit:

I have been reading & hearing on the news stories that rumor is going around about cutting the limit to one fish instead of the now limit of two (2) on charter boats. My family & I go on the charter boats to get some Halibut for the freezer - do not cut the limit to one fish but what you should do is cut the quota for commercial fisheries & increase the charter boat quota to 3 (three or four) 4 fish. In my opinion that would be more fair to families that go for food for their freezer - please think about this idea & treat the home freezer fair. Thank You

Sincerely
Betty M. Betts

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, Ak. 99501

RECEIVED

JAN 20 2000

Dear Chairman Lauber:

N.P.F.M.C

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides a allocation based on 125% of the 1995 charter fleet's harvest. A set allocation for one commercial group-charter boats- while the other commercial group-long liners- absorb all reductions in quota, is a sure formula for the demise of the commercial halibut long line fleet.

I IFQ program as implemented by the council has resulted in an orderly fishery. The ability to buy and sell quota has resulted in substantial investments by many of the participants in the halibut IFQ fishery. A council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to the fleet, and in many cases, the loss of a family business.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

It is important to know that I am 54 years old and have been halibut fishing for over 20 years.

I support my family entirely on what I make commercial fishing.

Several years ago I bought 4200 additional pounds of halibut quota. That lost me over \$52,000.00.

I thought it a wise investment since we live in the bush of S.E. Alaska and have no other means of employment in our local community of Edna Bay.

If we lose our life long worked for halibut quota and the quota we spent our life savings on we will be ready for the welfare lines.

Who wants to hire a 54 year old halibut fisherman?

Please know that our very existence depends on the income we receive from our existing halibut quota!

We have been through many life threatening situations on the open sea to achieve what we have in the halibut fisheries.

How can anyone give our lifelong hard worked for quota to someone else?

Thank you for listening to my and my families concerns and hope
that you will take them to heart.

God Bless


Russ Bartels

F/V Mariana

8044 Davidson Ave.

Edna Bay, Ak. 99950

Dear Council Members

I would like to take this opportunity to give my own personal input concerning the halibut allocation to the sport charter fleet in Alaska. I feel as though I should comment because I have participated in both. From 1980 until 1987 I was a charter boat operator in Kachamak bay and I have been a crew member in the halibut long line fishery since 1979. My present occupation is ship operator for the U.S. fish and Wildlife aboard the M/V Tiglax home ported in Homer. Please understand that my opinion does not reflect the position of Fish and Wildlife.

My first and foremost recommendation would be not to stay status quo. While participating in the sport charter industry I would carry sometimes 18 passengers to the grounds which were no more than 30 nm from town and harvest 36 fish for customers and 4 fish for the crew, a total of 40 fish. If the smallest fish was a 32inch fish average weight per fish 17lbs that is a daily harvest of 680 lbs. In 1982 I was running at least 80 trips per year that is an annual harvest for myself alone of 54400lbs per year. I feel that under the Local Area Management plan this kind of pressure has to be addressed. The pressure has only increased over the years since my participation in the industry.

After reviewing the public draft put out by your staff, I would agree with implementing a GHL to the charter fleet under issue 1 option 4 which would be to apply the GHL as a % to the CEY by area after non-guided sport and personnel use deductions are made. I also feel that bag limits and the prohibition of crew caught fish would be ample management measures necessary to ensure that GHL were kept in check. I do not support the idea of a moratorium to the charter fleet because once the GHL is implemented I feel that the harvest level will be the governing body of the size of the charter fleet.

I would like to compliment the staff and all participants on this endeavor for your hard work because it is clearly visible through your draft. A program was needed and is essential to carrying on the life of the local area halibut stocks.

Respectfully,

Billy Pappas

P.O. Box 882 Homer, Ak

RECEIVED

JAN 20 2000

N.P.F.M.C

PO Box 240543
Douglas, AK 99824
January 17, 2000

RECEIVED

JAN 20 2000

N.P.F.M.C

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

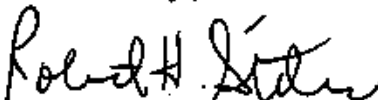
I have been commercially fishing halibut since 1967 when we received 19¢ a pound for our catch.

I have lived in Douglas, Alaska, since that time. The money made from the halibut I caught has supported local industries.

I strongly support giving the charter boat industry a percentage of the halibut allocation based on the abundance of halibut. I also support the allocation decision you made in 1997. Hopefully, it will be followed by regulations which will keep the charter fleet within their allocation.

I believe the North Pacific Fishery Management Council should keep the charter boat industry allocation within 125% of the 1995 harvest.

Sincerely,


Robert H. Sliter

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

North Pacific Fisheries Management Council
608 W 4th Ave Suite 306
Anchorage, Alaska 99501

I do not believe that the recreational fisherman should be placed in an allocation plan with the commercial fleet. I think that the bag limit should remain as two for halibut.

Raymond L. Ebling
Raymond L. Ebling
PO Box 36
Talkeetna, Alaska 99676

RECEIVED
JAN 20 2000
N.P.F.M.C

Peter Halverson
20214 Greatland Cir.
Chugiak, AK 99567

January 14, 2000

North Pacific Fisheries Management Council
Attn: Richard Lauber, Chairman
605 W. 4th Avenue, Suite 306
Anchorage, Ak 99501-2252

RECEIVED

JAN 21 2000

N.P.F.M.C

RE: Reduction of Halibut Limit

Mr. Lauber:

I'm a 63-yr old, retired, Alaskan Resident of 45+ years. I go halibut fishing 1-2 times per year.

If you cut the limit from two, down to one, I really don't think I will go out on Charters. You are hurting the Charter Operator & myself with the new, proposed limits.

Sincerely,


Pete Halverson
Chugiak

cc: t. garcia, NOAA

Thomas A. Ward
12001 Portage Drive
Anchorage, Alaska
99515
January 19, 2000

RECEIVED

JAN 21 2000

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

N.P.F.M.C

Dear Mr. Lauber,

I am a Senior Citizen, and I fish 'for free'. I fish practically all summer. My regular spot is the Kenai River. As a senior citizen, I have yet to fish to get 'the limit'. And almost - excuse me, I said the wrong word - almost is wrong - it is not ALMOST - but EVERYONE I know and see and talk to claim the same thing. At this point in this note to you - it is important to state that I also talk to folks who are working folks who are NOT Commercial Fisher-persons. They all say 'take what you need, do not waste any, continue to plan for the future. Fishing - for all of us who are NOT commercial fisher-persons, is a sport, an outing, a communion with nature, a place and a thing to do on a week-end. We are NOT responsible for the 'lack of fish'. Ninety percent of us - not counting me and the rest of us old folks - WORK ALL DAY LONG, 5 DAYS A WEEK, 4 DAYS A MONTH, ETC. Just how many fish do you TRULY BELIEVE THAT THE FOLKS STANDING ALONG THE RIVER BANKS TRULY TAKE HOME?

Let me talk about the Guides that so very many folks are upset about. I go out on a charter 1 time per year for halibut. The limit is 2 per person. Every guide that I had the pleasure to fish with, UPHELD THAT RULE. I saw many halibut put back into the waters because it was too small or simply too big to 'be good tasting halibut'. You may say, 'Well there is always a trophy out there for the largest fish.' That is true, but every guide that I worked with, KNEW WHAT THE LARGEST ONE WAS - perhaps not to the pound - but close enough to give the folks a choice. Yes, it is true that there are many guided boats out at sea - and all have 4 to 6 folks fishing. With 4 folks that is 8 fish, with 6 folks that is 12 fish. You cannot tell me - and I don't care about any number you use - that guided boats carrying folks like me, are the ones who are cleaning out the halibut. If you believe that, I indeed think that you are in the wrong job. Only fishing with huge nets, fishing day after day after night after night for the LIMIT EACH AND EVERY DAY AND NIGHT can only be the answer.

Please sir, allow me to give an example of what I am telling you.

Please picture a beautiful forest. First one man goes out and cuts down an ever-green tree for Christmas. Then the next year, he tells his friend about the forest. They both go out to cut down a tree. That goes on for several years. Soon, the men say to themselves, 'We

will need to plant two trees for every tree we cut down. That way, our children and their children will have the joy of 'CUTTING DOWN THEIR OWN CHRISTMAS TREES.'

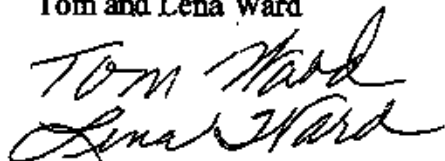
Now for the other side to that story. In that same country, state, town, or city, LOGGERS come in. First they log acres of trees, then entire areas, and before one's eyes, the area looks like the 'tundra'. Who now do you say is RESPONSIBLE FOR THE LOSS OF TREES? The men who cut down Christmas trees one time per year, replanted two for one, or the men who – and all for the sake of MONEY – came in and cut down ALL OF THEM AT ONE TIME. THEY WERE NOT CHOOSING ONE SPECIAL TREE, BUT CUT DOWN EVERYTHING, PLANTS, TREES, SHRUB, ETC.

Sports fishermen are selective. Commercial fishermen are not. Please think things out CLEARLY.

Thank you for your time, your attention, and your consideration to this matter.

Sincerely,

Tom and Lena Ward

Handwritten signatures of Tom and Lena Ward. The signature for Tom is written above the signature for Lena.

January 16, 2000

N. Pacific Fisheries Management
605 W. 4th Avenue, St. 306
Anchorage, Ak 99501

To: Chairman Richard Lauber

If we are not Commercial Fisherman, why are our halibut fishing limits being cut? Please let it be known that I, as a private fisherman, do not agree with this proposal. It harms not only the private sector, but the Charter operators, as well.

I also feel there should be a balanced vote to decide what the limits should be.

Thank you,



cc. terry garcia, Natl. Oceanic

RECEIVED
JAN 21 2000
N.P.F.M.C

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

RECEIVED

JAN 21 2000

N.P.F.M.C

This fisherman supports abundance management on the charter halibut fleet. If the charter fleet has a fixed allocation, then the council is making a decision that will affect payment on state loans. In 1992 this fisherman qualified for a state loan. Longline was approximately 80% of my income. Then came IFQ's and I have no job and struggle to make payments. Presently I am invested in the halibut fishery and ibid by abundance management. Presently this fisherman depends on the halibut fishery to make payments on a current state loan.

I wrote a letter last spring to Governor Knowles and received a very disappointing answer. Governor Knowles stated "the guided halibut charter industry may not be able to adapt to sudden changes in harvest levels as easily as the commercial fleet." The charter fleet can readily adapt compared to the commercial fleet and they don't have to buy a permit! If the charter fleet is managed on a fixed allocation verses abundance than the losers are the commercial fishermen and the communities they support.

Andrew Worhatch
Andrew Worhatch

Andrew Worhatch
Box 644
Petersburg AK 99833

Doug and Nancy Ogden

Phone 907-349-3583

PO Box 200593

Fax 907-344-5465

Anchorage, AK 99520

autographs@gci.net

Governor Tony Knowles
PO Box 110001
Juneau AK 99811

January 20, 2000

Re: Halibut GHL/NPFMC

Dear Governor Knowles,

My name is Doug Ogden and I serve on the NPFMC Advisory Panel. I represent Sport Anglers.

As you are aware, the Council has been considering numerous alternatives to reduce and, ultimately, control resident and non-resident sport harvest of halibut by regulating the charter fleet. The current problem statement indicates growth that data does not support and is written to appear to protect the charter fleet from itself. But the goal of this proposal is to reduce sport angler harvest and move those uncaught fish to the commercial fleet. It is the sport anglers that harvest the halibut and the Sport Fishing License they bought entitles them to that opportunity.

The Council analysis indicates that among all the alternatives the only way to effectively reduce or control sport harvest to within the proposed GHL(s) is to limit season and/or bag limit. The Council has indicated that they prefer to not take these measures but none of the other alternatives accomplish the intention of the proposal (or the Council). The Council is, in effect, forcing an ill fitting regulatory process on an industry that cannot be regulated using the alternatives that have been offered.

If the GHL is reached, the whole region will be thrown into a regulatory action that could dramatically affect access to a healthy public resource we sport anglers have every right to harvest. Make no mistake, this allocation is NOT based on biology. It is driven by economics.

The council analysis briefly mentions the resulting ripple effects to other state managed fisheries as well as the economic impacts to the related support industries the implementation of GHL regulations would cause. The Council analysis does NOT mention who is going to implement the regulation(s) nor does it mention who is going to monitor, enforce or, more importantly, who is going to pay for it.

With the exception of Status Quo, the current set of alternatives is unacceptable to the sport fishing public. As a member of the Advisory Panel, I have no alternative but to vote Status Quo. With a Council made up of primarily commercial fishing interests that still do not understand the sport fishery or charter business, the political reality is a regulation will be adopted whether it fits or not. I encourage you, Governor Knowles, to direct the State position away from this ill fitting, economic allocation known as GHL. This suite of alternatives is unacceptable to sport anglers as well as the State. Status Quo is the only acceptable choice.

Recently, a proposed idea has resurfaced suggesting that the charter fleet be awarded IFQ shares based on historic harvest. If the Council insists on moving ahead with regulations as opposed to Status Quo, this is a concept that may be worth investigating. Please consider this as an option for the State position if the Council does not embrace Status Quo.

Sincerely,

Doug Ogden

cc: Kevin Delaney
Phil Cutler, President, AK Sportfishing Association
Clarence Pautzke, Executive Director, NPFMC
Richard Lauber, Chairman, NPFMC

RECEIVED
JAN 21 2000
N.P.F.M.C.

All of you on that stupid Commission
Are OTOISE. Look it up

NPFMC

1-19-00

~~TO THE FISH~~

Seldovia, AK.

Commercial Fishings Best Kept
Secret. "The Crucifier"

This is a device that you can pull your
hooks through but, is too narrow for the
fish to come through result is pulling
the hook out of the fish 90% of the fish
being dropped back into the water dead
This has been going on for years NPFMC
just turns their heads, if they cared that this
was going on they would outlaw the use
of fixed or stuck ~~to~~ gear and make
snap on gear the only method used. With
snap on gear you bring the fish aboard
remove the hook and put the fish back in the
water alive. Sport & charter boats don't kill 80% of
the fish all season Jay Wilson

that commercial fishermen do in Seldovia AK

L Day (907) 234-7885



Bear Valley Lodge

January 17, 2000

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

RECEIVED
JAN 24 2000
N.P.F.M.C

Dear Mr. Lauber:

I would like to express few of my views on the Alaskan Halibut Sportfisheries as a charter boat owner and operator.

The sport fish industry has never been well represented by commercial fishermen, fish processors and the bureaucrats. They have made decisions without our council or consideration.

Halibut are classified as a Federal Common Resource, therefore every citizen in the United States should have equal right to this resource. The charter industry is a healthy industry. We also provide jobs, buy fuel, bait, groceries and supplies. We generate income for many other businesses including but not limited to the air travel industry, motel/hotels, sporting goods stores, clothing stores, car rentals, taxi cabs and much more.

No one wants to see anyone loose their business, but it is time the commercial fleet cleans up their own back yard - at their expense. The commercial halibut quota in 1997 was fifty one million pounds. In 1999 the quota was fifty eight million pounds. Add twelve to fourteen million pounds for bycatch, and, who knows how many thousands of pounds in waste. Now the commercial fisheries feels it is fair to cap the charter fleet at four to six million pounds per year. This is a very small percentage for a COMMON RESOURCE ! If there is sufficient resource to increase the commercial fleet is there not enough to increase the charter fleet by the same percentage ? If there is not enough resource for both, why favor one fishery over another ?

In the recent past you could follow the commercial halibut fleet by following the trail of orange fish floating on the surface behind their boats. In the early 1980's the Commercial Fisheries developed a new fishery - "Yellow Eye Rockfish" (Red Snapper). It only took a few years and the Red Snapper resource was destroyed for twenty five to forty five cents per pound. Now that Red Snapper is in short supply the sport fisherman was put on a limit of two a day to help save the species.

There is good news. The commercial "Spot Prawn" (shrimp fishery) has done exceedingly well. Fish & Game was quick to take credit for their great management. Allowing a fisheries to be open in the winter when the shrimp are egged up seems a little odd, but, when you consider that it was the Red Snapper who fed upon the shrimp and kept the natural balance, it stands to reason that there would be more shrimp.

I can't be too quick to place all the blame for mismanagement on the State of Alaska. The Federal Government has decided to protect the predator to create a new problem. When you protect the predator and not the prey the predators will soon destroy the prey and have no choice but to die or relocate to another area.

My wife and I live on the Northern part of Prince of Wales Island. We have built and operate a small fishing lodge. Our fishing clients come from every part of the United States. Even the local people from Ketchikan and Prince of Wales are counted among our satisfied customers. Our clients return year after year for the great fishing, location, food and friendship. To put our future in the hands of the Commercial Fisheries Management Council would be like having Hershel The Sea Lion keep watch over the loch at Ballard, Washington. Any good breeder knows that you can't be successful by destroying the healthy stock and letting the weak and diseased increase.

In closing I urge you to make a reasonable and fair decision on this COMMON RESOURCE. Not only for the Charter Industry but for the people of the United States now and in the future.

Good Fishing,



Capt. Glenn & Kay Keller

PS: Treat it like a business. When it comes to bringing revenue into Alaska check the price per pound of sport caught fish vs. commercial caught fish.

cc: Dennis Austin - WA Dept. of Fisheries
David Benton - A.D.F.& G.
Penny Dalton - NOAA
David Fluharty - Univ. of WA
Joe Kyle - Pacific Assoc., Inc.
Steve Pennoyer - NOAA
Frank Rue - A.D.F.& G.
Gov. Tony Knowles
Terry Garcia - NOAA
Sen. Ted Stevens
Rep. Don Young
Sen. Frank Murkowski
Island News - Prince of Wales
Ketchikan Daily News - Ketchikan

Jan 16, 2000

Honorable Rick Lauber
Chairman

North Pacific Fishery Management Council
605 West 4th Ave Ste 306
Anchorage, AK 99501-2252

Dear Chairman Lauber,

I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charter boats in 1997.

Giving further harvest rights to charter boats seems very unfair to commercial fishermen who have paid for quotas.

Yours truly
Hazel D. Wiley
5301 The Toledo Pl
Long Beach, Ca 90803
copy cc Governor Tony Knowles

January 23, 2000

RECEIVED

Jan 24 2000

N.P.F.M.C

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Ak. 99501
Ph. 271-2809, Fax 271-2817

RE: Halibut GHL (Charter Boat Allocations)

I would like to express my opinion regarding this issue prior to the council meeting in February.

My son and I could not make a living in the commercial fishery in the past so we subsequently sought employment elsewhere. I did receive (& still have) some Halibut IFQ that I have never fished however in about three years I will have adequate supplementary income so that I can return to the fishery. I do plan to purchase additional IFQ when the time comes.

As you well know, the halibut allocations fluctuate as the stocks rise and drop. In the past, the commercial fishermen absorbed this economic impact. I have a difficult time understanding the logic behind giving the Charter operators a fixed allocation and letting the commercial fishermen absorb the total impact of any stock fluctuations. I believe that in times of plenty, we all share in the bounty however when it is time to tighten the belt, we all tighten our belts. (Commercial fishermen, Charter operators, and Sport fishermen)

I SUPPORT THE CONCEPT OF ABUNDANCE BASED FISHERY MANAGEMENT FOR ALL.

Thank you for considering my opinion.

Sincerely



Steven Flodin
PO Box 671269
Chugiak, AK. 99567



Winter
P.O. Box 2670 Poulso, WA 98370 • Ph: 800.544.2261 • Fax: 360.697.7850
Summer
33881 Sterling Hwy, Sterling, AK 99672 • Ph: 800.544.2261 • Fax: 907.262.8797
email & website
greatalaska@greatalaska.com • www.greatalaska.com

RECEIVED

JAN 24 2000

N.P.F.M.C

Tuesday, January 11, 2000

Dear Richard Lauber,

The lure of fishing in Alaska is vulnerable when one considers today's low cost, high quality angling opportunities worldwide. A drop in the daily catch limit from two halibut to one halibut averaging 15-20 pounds is a huge change.

Alaska is legendary with Anglers worldwide because it is wild and filled with great fish stocks. I recommend that you best serve Alaska at the North Pacific Fishing Council meeting by keeping the magic in place for visitors and damn near everyone that lives here.

Laurence John

Great Alaska Adventure Lodge

3119 Douglas Highway
Juneau, AK 99801
January 21, 2000

RECEIVED
JAN 24 2000
N.P.F.M.C

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

Dear Mr. Lauber:

I strongly urge the Council to maintain the charter halibut fleet allocation at 125 percent of the 1995 harvest as you voted to do in 1997.

Throughout my twenty-five year career as a longliner, I have invested heavily in gear, a larger boat, and, more recently, in quota shares. The decision to so invest has been influenced largely by the historic policy of abundance-based management of the halibut fishery by the IPHC.

I was dismayed to learn of the charter industry's attempt to acquire a larger guaranteed halibut poundage quota than previously allocated. The charter fleet should NOT receive preferential access to this valuable resource that has been successfully managed for so many years based on abundance. Any guarantee of increased poundage to the charter fleet would be grossly unfair to those who for many years have invested in and depended upon this fishery through high and low cycles.

My crew, family and I thank you for your careful consideration of this letter.

Sincerely,



Ted Merrell
F/V Dundas

cc: Governor Tony Knowles

***F/V Swan
Gary & Martha Egerton
Sitka, Alaska***

Gary & Martha Egerton
PO Box 3094 Sitka, AK. 99835
PH: 907-747-8049 FAX: 907-747-8571

Honorable Rick Lauber, Chairman
North Pacific Management Council
605 West 4th. Ave., Ste 306
Anchorage, AK. 99501-2252
Fax 907-271-2877

January 21, 2000

RECEIVED
JAN 24 2000
N.P.F.M.C

My wife, son and I have been year -round residents of Sitka Alaska for the past fifteen years. We depend entirely 100% on commercial fishing for our livelihood.

I was not a proponent of the IFQ system when it was developed. I did not fish enough of the qualifying years to be issued a large block of IFQ's. Therefore, believing they would be a sound investment I borrowed \$100,000.00 from the state of Alaska and \$40,000.00 from the bank and bought most of the IFQ's I now fish. I also have a state loan for my fishing boat, troll permit. I fish 12 months a year in various fisheries in order to make these loan payments, house payments, and enough money to survive.

This year I am looking at a 26% reduction in my halibut quota because of lower abundance. This cut alone is going to make it hard to make my loan payments.

The ADFG sponsored option to grant the Charter fleet a fixed or stair stepped allocation in pounds which is not directly, linked to abundance could make it impossible to make my state loan payments which would put me out of business.

***F/V Swan
Gary & Martha Egerton
Sitka, Alaska***

This would also eliminate a year-round job for one crewman who has been with me for five years and a six month job for another crewman. This would also eliminate my support of many local businesses like grocery stores, gear stores, fuel docks, cold storage's, etc.

I don't understand how anybody could think the Charter fleet shouldn't have to take a cut when the Commercial fleet does. I have always been told that ADFG never gets involved in allocation issues, so what are they doing? This is contrary to Alaska's management principles and undermines the states management authority.

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. You should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

The North Pacific Management Council should keep the Charter allocation at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

Your consideration of this letter is appreciated. Remember, Sitka, like many other small communities in Alaska would collapse if it were to rely on Charter boat fishing instead of Commercial fishing.

Sincerely,
Gary & Martha Egerton

cc Governor Tony Knowles
Ted Stevens
Frank Murkowski

Gary Egerton *Martha Egerton*

El Capitan Lodge

"Where Fishing IS Catching!"



January 17, 2000

RECEIVED
JAN 24 2000
N.P.F.M.C

Rick Luuber
NPFMC
605 W. 4th Ave, Suite 306
Anchorage, AK 99501-2252

Dear Mr. Luuber:

Alaska's guided halibut sport fish industry needs HELP!

We need continued fair and reasonable access to the halibut fishery.

The North Pacific Fishery Management Council (NPFMC) will meet on February 7, 2000. Once again, commercial fishing interests are attempting to control and dictate unfair restrictions that harm the sportfishing industry and unfairly benefit commercial fishermen.

Currently the bycatch from the commercial fisheries is 12 to 14 million pounds of halibut, plus several million additional pounds are wasted annually. This is **FOUR TIMES** the level of halibut proposed for the sportfish industry.

In the last three years, longliner's harvest opportunities **INCREASED** by 50%, while sportfishing levels remained at two fish per person as it has been for years.

Sportfishing is usually conducted for only 3 to 4 months per year. Commercial fishermen would scream if they could catch only two fish per day for only a few months a year.

The Sportfishing industry should be able to continue to catch two halibut per person per day.

The political power of commercial fishing interests controls these issues and is intent on driving the sportfishing industry into oblivion.

In a state where tourism is greatly depended on by the people of many cities and small towns, it's economic suicide to allow the commercial fishing industry to squeeze out fish related tourism, one industry that can help keep Alaska's economy healthy well into the future, and do so WITHOUT recklessly slaughtering Alaska's natural fish stock.


My family sportfishing business began in Alaska over 30 years ago through the hard work of my mother and father homesteading property and building a sportfishing lodge. Since then, my family has invested not only our lives, but millions of dollars to make this business survive. It's difficult to make any seasonal fishing lodge in Alaska successful, even under the best of conditions, but to do so without a fair limit on halibut would be impossible.

If my family's sportfishing business doesn't get fair treatment by regulatory agencies, we'll be forced to file bankruptcy. Is this what will eventually happen to all Alaskans that have invested their time and money in a business that is dependent on the smallest allocated portion of halibut in the entire Alaskan fishing industry?

If we need to limit our overall fish harvests, it's time the NPEMC opens its eyes and sees which fishing industry should be limited to best serve this purpose. It's obviously not the sportfishing industry.

Please support the Alaska Sportfish Council and our reasonable approach to this economically important issue.

Sincerely,



Scott Van Valin
Vice President
El Capitan Lodge, Inc.

JAN 15 2000

Honorable Rich Lauber
Chairman
N. P. F. M. C.
605 West 4th ave Suite 306
Anchorage, AK 99501-2252

RECEIVED

JAN 24 2000

N.P.F.M.C

Dear Chairman Lauber

I feel very strongly that Sport Halibut Bag Limits Need To Be Changed To One or Two Halibut Per Year For Out of State Sport Fisherman

The Reason is Because Things and Time Plus Better Technology Have made The Sport Fishing much more Productive in The Last (20) Twenty years

Number One Travel Time To Alaska is only Three To Four hours From anywhere in The U.S. Before you Had Two Days of Travel and more By Planes Driven By Propeller. Now you Have Jets.

Number Two you Have people who Have much Higher Paying Jobs and Lower Air Fare.

Number Three Sport Fishermen Can Freeze there catch or Ice them Well in Insulated Totes or Air Shipping Boxes and in a few hours they're Home. Many of These Sport Fishing 'Out of State' people Are Taking Home Three Hundred Pounds of Halibut Fillets, Alaska Air Lines will Document These Facts

Before Out of State Sport Fishermen Had No Choice But To Salt, or Smoke or Cann Their Halibut. Most Just ate one Fish Here in Alaska and Released the Rest Back To The Ocean.

Add all the above Facts Together and you have
a out dated Bag Limit or catch Limits For Alaska
Out of State Sport Fishermen

I am visiting My Mother in Southern California Now
as I write this Letter and I can't or have a hard
Time Believing The Fact How Many People Want
Fish Salmon or Halibut. There's Hundreds in there
(50) Fiftys or up To Eightys or So.

I Don't Think we Should Disappoint These
People By giving Our Alaska Halibut To a
Out of State Sport Fisherman, 97% Percent
are Out of State.

I Don't Think The State Maine would Like
their Commercial Lobster Fishery Turn in
To a Sport Fishery.

If There's No Guideline harvest Level action
Taking or set For Halibut Charter Boats in 1997.
Adopting a Charter Boat allocation based on the
other options under consideration will hurt
consumer access To Halibut.

Please Believe Me I've seen it Happen
in Calif as a young Boy and as a young Man
in Washington. If you Don't Take a Hard Line
Now There will be No Pebbles unturned from Southeast
Alaska To The Upper Most Regions of Alaska.

Sincerely

Philip Wiley
P.O. Box 115
Sitka, AK 99835
Anti Share owner



"The Center of it all on the Homer Spit"
4241 Homer spit Rd.
Homer, Ak. 99603

RECEIVED
JAN 24 2000
N.P.F.M.C

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Ak 99501-2252

Dear Sirs:

I am the owner of Central Charter Booking Agency in Homer Alaska. We have a large office, gift store, home, and boardwalk on the Homer Spit. We have operated this business since 1995 providing fishing, sightseeing, kayaking, and Danny J tours. Up until September of 1999 we have not owned a boat. We would advertise, book customers and then contract with boat owners to take the people we had booked. Some of the fishing boats out of our office have been there since 1985, although not the same owner or captain.

I have been looking at boats for 4 years until I found just the right one. I was very careful to make sure that it had fished halibut back past 1995 thinking that this would assure me a place in the Industry. This boat was not fished in 1998 because it was going through a major overhaul but did fish and had a logbook in 1999. Over the last few years as our industry has been worrying about regulation, no mention was made of a log book being part of the requirement to gain entry. As I read the 240-page report my heart sank when 3 of the 4 requirements included the 1998 logbook. Here I am with \$70,000 (most of it borrowed) invested in a new boat and the odds (3 out of 4) are I will not be able to fish it. The boat that has run in the number 1 spot in my office for the last 3 years was sold to a new owner who is not going to fish it. When I heard of the requirement of a 1998 logbook I went to the old owner to see if he would transfer or pass on the logbook from 1998 to me. He said, "Sure, how much is it worth?" Well I didn't know so I would ask you gentlemen, "How much is it worth"? With the stroke of a pen some of these charter operators business will double and triple in worth because they now have a very exclusive use permit. They will say they deserve it because they have been in the business so long and maybe they do but it is a real blow to my business. It seems this is the very thing that happened to the commercial fishing industry when the IFQ system went into place. I think it would be easier to accept if they weren't getting rich out of the

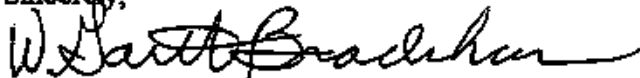
deal. The boat owner that I mentioned earlier who sold his boat got a fair price out of it. He is now in line for a big windfall when he becomes the new owner of a charter fishing permit that he can now sell to some one else like me, who didn't make it under the wire. Now I have a \$70,000 boat and \$??,??? permit to pay off!

I would suggest that you issue permits under the least restrictive option and then make them nontransferable. The person who has it can move it to a new boat of his own but can't sell it or give it to any one outside his family. When they no longer want to fish then it goes back to the Fish and Wildlife or whoever the ruling council is. This council can then keep it or give it to the next person on the list based on what level they want to control the industry at. This type of system would keep some of the money and greed out of this new plan. With the turn over in the industry, as mention in the report, the numbers would probably be down to 500 or so "which is the same as under the most restrictive option in 3A" within a year or two. Even at this level, we can harvest more fish than the GHL will permit if we have enough customers. One of the reasons the numbers of potential licenses are so high is because people have been anticipating this very thing would happen. If you take away the possibility of selling the permit, then a great number of boats wouldn't even want them. If they don't fish the new license within two years then it goes back to the ruling council.

As for other measures, I think most of us would give up the crew fish in-lue-of a one fish limit. The report says one fish is the only other measure which would limit the industry below the GHL. I would say that a one fish limit would put great pressure on the other sport fish of the area. I believe that the customer would pay the going \$150.00 if they could catch one halibut and one King salmon or a number of the other sport fish. To do a "Combo" every day would be very hard on us but to keep the price up we would have to do it. I do not believe that I can sell a one fish halibut trip at the going price. I was surprised that there was no data on the affect of a slot limit that is common in other fisheries. I would think that size limit of say 36" to 65" would help keep the biomass stable.

There is no way you can estimate the impact you will have on peoples lives and future with the recommendations that you will make. Please know that many of our futures in Alaska will be greatly affected by what you do.

Sincerely,



W. Garth Bradshaw, president

Richard Lauber
605 W. 4th #306
Anchorage, AK 99501-2252

RECEIVED
JAN 24 2000
N.P.F.M.C.
Domenick J. Monaco
P.O. Box 1704
Anchorage, AK 99835
January 8, 2000

Reference: North Pacific Fisheries Management Council

Dear Mr. Lauber:

I am writing to you to express my concerns regarding the February 7, 2000, meeting of the North Pacific Fisheries Management Council. The council will be taking action regarding the guided halibut sportfishery.

First of all, I would like you to understand that recreational anglers, both guided and non guided, are strong supporters of sound management practices of our public fishery resource. The current halibut bag limit for sport anglers was reduced in the 1970s to the current two fish in response to reduced abundance of this resource and was supported by the public as a needed conservation management tool.

I do not support adoption of the proposed guideline harvest level for Alaska's guided halibut sportfishery. It seems incredulous to me to be targeting any sport-fishing group when the harvest level data clearly shows that the entire sport-fishing take is but a very small proportion of the commercial take and is even less than the commercial industry's bycatch and waste. Recreational anglers should not be penalized for the exploitation of this public resource by the ever-increasing quotas and wasteful practices of the commercial fishing fleet. When the sportfishing bag limit was reduced back in 1975 in response to reduced abundance it was never again raised as the halibut populations rebounded. And abundance of these stocks has increased, some 300%! This was not the case with the commercial fleet. Their quotas have continued to increase proportional to the stocks. Any proposals at this time to address future decreases in halibut stocks should be targeted toward the user group that has benefited over the years by ever increasing quotas, not from sport anglers whose limits were decreased twenty-five years ago. The low guideline harvest levels being proposed will not provide reasonable and equitable access to non-commercial users of this public resource. The daily sport bag limit should remain at the current two fish, for guided and non guided anglers, since this was a conservation measure taken when the halibut stocks were very much lower than they are today. Furthermore, putting harvest caps on the user group that takes the least amount of halibut cannot be viewed as a conservation measure, but rather as an arbitrary constraint placed upon one user group by another.

I believe the time has come for a comprehensive management plan for Alaska's halibut fisheries. However, a management plan must be developed in a forum of equal representation by sport fishers as well as commercial fishers. The Magnuson-Stevens Act requires representation on the regional councils to be fair and equitable to all user groups. Management of one user group by another serves only to alienate the involved parties and is clearly not in the best interest of the public resource. Until management plans are developed in open forums with equal representation by all affected parties they will never be supported by the public.

Thank you for your attention to this matter. I would appreciate any influence that you can provide to bring a more equitable solution to this very inequitable proposal.

Sincerely,


Domenick J. Monaco

January 24, 2000

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

RECEIVED
JAN 25 2000
N.P.F.M.C

Dear Chairman Lauber,

I am writing this letter to oppose actions by the NPFMC that would provide a fixed poundage allocation to the halibut charter fleet. I strongly favor an allocation based on 125% of the 1995 halibut charter fleet's harvest. The chartered halibut fleet should not be allowed to expand at the expense of the commercial halibut fishery.

My family, my crew, and myself depend on the commercial halibut fishery for over 50% of our annual income. I have saved and borrowed to invest more than \$1,000,000. in halibut IFQ. I have an annual payment for those IFQs of over \$95,000. I made this investment because I was led by state and federal government agencies to believe that this halibut fishery, under IFQs, would be sustainable and rational. Now it appears that these same government agencies are advocating a redistribution of the resource to the halibut charter fleet. This issue obviously is a direct threat to my ability to make a living, repay my loans, and could erase the equity I have worked so hard to build into the Halibut IFQ fishery over these past 5 years.

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

Your consideration of this letter is appreciated.

Sincerely,



Steve Daniels

F/V Indigo
124 Salmon Way
Pelican, Alaska 99832
SDIndigo@aol.com

cc: Governor Tony Knowles

January 24, 2000

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

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

RECEIVED
JAN 25 2000
N.P.F.M.C

Dear Mr. Lauber,

During the week of February 7th, the North Pacific Fishery Management Council (NPFMC) is posed to implement restrictions on the guided halibut charter fishery. After attending all meetings regarding this issue for the last three years, trying to keep an open mind, I have reached the conclusion they are about to make a tremendous mistake. My rationale follows:

The NPFMC is on the threshold of guaranteeing commercial halibut fishermen a subsidized living at the expense of guided sport fishing and those who rely on seasonal income from individuals engaged in the pursuit of halibut. Have no doubt – the North Pacific Fisheries Management Council is cutting up the pie and giving out the pieces – the guided halibut sport fishery is going to get a very small piece of pie. The following are thoughts on the charter halibut allocation issue.

- 1) The North Pacific Fisheries Management Council is scheduled to establish an allocation of halibut to the charter fishery in southeast and southcentral Alaska during their February 2000 meeting in Anchorage. This marks the first time that the North Pacific Fisheries Management Council has limited sportfishing access.
- 2) Regardless of what Governor Knowles says, there is no sport fishing representation on the North Pacific Fisheries Management Council.
- 3) The North Pacific Fisheries Management Council is sitting at a point in time with halibut right where the Alaska Board of Fisheries (BOF) was sitting in the late 1970's with Cook Inlet salmon in terms of setting policy on allocation. The Council is poised to repeat the same mistakes made by the BOF.
- 4) These mistakes were to adopt an allocation that was too small and to adopt a policy approach that was not responsive to changes in demographics or market conditions within the affected areas. Time has proven that this approach didn't work in Cook Inlet and it will not work for the charter fishery.
- 5) If the Council allocates too little halibut to the charter fishery the effects will be felt beyond the halibut fishery. As access is limited to halibut, anglers will either not fish, thereby reducing the amount of commerce generated by recreational spending or fish for other species which are likely in much shorter supply. This shift to other species will be an issue critical to the management of recreational fisheries for rockfish and

lingcod and also for king salmon, especially near the large population centers in southcentral Alaska.

- 6) The IFQ program for commercial fishermen has resulted in far more commercial longline for halibut fishing near Alaska's coastal communities and during the summer when all non-commercial use is most intense. This has contributed to gear conflicts and local or seasonal depletions. The Council identified local depletion as part of the reason for limiting the charter fishery but they have taken no action to address the increase in longline fishing close to coastal communities.
- 7) Commercial fishing interests claim that the management of the charter fishery must be "abundance based". Commercial interests want the Council to hold the charter fishery to a fixed percent of the amount of halibut available for harvest after waste, commercial bycatch, non-charter sport and personal use harvests are subtracted from the total amount. Charter harvest now comprises approximately 10% of the total harvest. Allocations for commercial bycatch and waste are not based on halibut abundance. Bycatch and waste allocations are based on many factors including market conditions for other species such as pollock and cod. Any allocation to the charter fishery should take into account market factors as well as halibut abundance.
- 8) Halibut stocks are healthy but harvests are projected to decline over the next few years. This should not be confused with a conservation issue. This decline in harvest is just that, a harvest issue, this whole debate is about how the halibut resource is allocated not how it is sustained.
- 9) How any allocation/management strategy for halibut will be implemented and who is going to pay for that implementation is not known. Cost is likely to be significant.

When the composition of the NPFMC is questioned we are insured everyone will be fairly treated and all voting members will not be biased. Linda Behnken, Executive Director, Alaska Longliners Association, is a voting member on the Council. We can rest assured she will not be biased when she casts her vote on restrictions for the charter fleet. By the way, she introduced the halibut guided fishery problem to the Council in 1993.

I know you receive a lot of mail regarding this issue. I ask you to carefully consider what you are about to do, you will find it clearly pits one group against another over allocation of halibut. I can understand how the commercial halibut longliners feel about a possible decrease in revenue, however, they are in a competitive business and should not ask the Council to guarantee them the right to catch fish at the expense of the public.

Sincerely,



George E. Hiller

9523 Noak Cir.
Eagle River, AK 99577
amerson@alaska.net

January 19, 2000

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

RECEIVED
JAN 25 2000
N.P.F.M.C

To Whom It May Concern:

I would like to express my concerns and add some recommendations as to how we can avoid a problem with the declining halibut population in area 3, i.e. Cook Inlet. Listed below is my recommendation as to some simple fixes along with some major recommended fixes.

Simple fixes:

1. Make it so that it is illegal for the charter boat crews to fish for halibut while paying clients are on board the vessel. This would reduce the catch up to 25% on six pack boats, i.e. reduce potential catch from 16 fish to 12 fish on a boat with 6 clients and crew of 2.
2. Prohibit the practice of doing daily double halibut drips. This is not just greedy but also unsafe due to the fatigue factor associated with the crew spending so much time on the water each day.
3. Limit the total number of fish that non-residents can catch per year, i.e. 4 halibut per year. We already limit number of kings which can be caught annually out of Cook Inlet so why not halibut.
4. If we must make the daily bag limit 1 fish, lets not restrict the residents that spend their winters up here, leave their limit at 2 fish. If you qualify for a dividend check, your bag limit should be 2 fish per day.

Major fixes:

1. Limit the number of charters that operate in Cook Inlet. As of some date, NO NEW CHARTERS, there is ample numbers already giving services to the public. As I understand it, there is no new commercial permits issued for halibut fishing with the IFQ system, if you want to fish and you don't have a permit, you must buy a permit from someone selling one.
2. Determine an equitable percent, of the total annual halibut harvest, which the charter operators can catch per year. Then if there is a reduction in the annual harvest limit is imposed, the charter operators can partake in the reduction, along with the commercial operators.
3. With the annual halibut limits in effect for the charter operators, they would be required to log every fish that is kept, as soon as the fish is killed, the length/weight (using a halibut weight chart) will be recorded and at the end of the day subtracted from the remaining annual halibut harvest limit. If a charter is found not logging their harvest appropriately, remaining annual limit would be forfeited.
4. Upon reaching your annual harvest limit, charter operators would be required to stop fishing for the remainder of the season. No different from the current IFQ system for commercial fishermen.

These are just a few ways to reduce the total fish harvested in times of reducing stock. I feel that these limits/rules would make the charter fleet do their part along side of their brothers, the commercial fleet.

John Amerson

Ric Vrsalovic
PO Box 709
Whittier, Alaska 999693

January 23, 2000

RECEIVED

JAN 25 2000

N.P.F.M.C

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue Ste. 306
Anchorage, Alaska 99501-2252

Ref: Charter Guideline Harvest

Sir,

I have been a commercial Halibut fisherman for 18 years. I have worked hard learning the trade so that I can secure a stable income. There are many fellow fishermen and deck crewmen who dream of becoming commercial longliners too. They will eventually buy IFQ shares in the open market to continue our industry. They may shy away however if they see their future threatened by unknown sources.

I won't go into extended detail as to the reasons why you should preserve our commitment, you have probably heard a lot of them by now. I would like to say that I support the allocation of halibut to the sportfish group (through charter boats) in accordance to the base of abundance and historic levels. In fact, I thought the sport allocation was always counted for the annual report, but not officially designated to any specific group.

Sincerely



Ric Vrsalovic

RECEIVED

JAN 25 2000

Richard Lauber, Chairman
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, Ak 99501-2252

NPFMC
1/20/2000

Dear NPFMC Chairperson:

I moved to Juneau, Alaska in 1978 with my wife Sandra. To date I have a 19 year old boy who is a sophomore in college and a 16 year old boy who is a Junior in high school. My wife and boys have spend most of their summers on my boat working as a deck hand or a crew hand while I commercial halibut fished and when chartering.

I've halibut fished for 20 years in the Juneau area and I have IFQ shares, but most of my summer activities on the water the past 7 years has been spent chartering for halibut, salmon and whale watching. In Juneau whale watching has also become an important activity for charter boats due to the high demand.

I've found the demand for halibut trips in the Juneau area to be on a decrease. Many boats won't charter anymore for halibut because of the distance involved to find halibut. The change has taken place because of the IFQ fishing program. No longer are halibut available in the immediate Juneau area, because weekly, longliners set skates on traditional halibut grounds taking halibut which have moved into the area. Over time the numbers have decreased to the present situation. I've found it almost impossible to fish locally and catch halibut on a charter. I now have to travel to Icy Straights, some 40 miles from Juneau, to find halibut. In recent seasons I've found a major decrease in halibut numbers and a major increase in competition from commercial fishing, charter boats, sport fishermen, and nonresident yachts on the traditional halibut humps in Icy Straights and Chatham Straights. **The Juneau Empire last Fall featured a front page story which stated the commercial halibut catch in the Juneau area was at record numbers.** Those fish were not caught by local anglers.

I have a major concern for what I see as a growing problem for local resident and nonresident anglers. I know commercial fisherman have a history of working the grounds, catching fish, and selling fish based upon their license and equipment. I also see that times are changing. More and more residents and nonresidents want to enjoy what the Alaskan waters have to offer. I find it hard to understand why commercial fishing should harvest the stock yearly for profit at the expense of resident and nonresident anglers who are willing to spend money to catch

their own fish. Something is wrong in a system that limits that opportunity when the stocks are healthy enough for a realistic sport catch.

I firmly believe charter boats are just a transportation vessel to enable residents and nonresidents alike the opportunity to fish Alaska waters. I would hate to see the day when nonresidents purchase and store vessels in Alaska waters, so they can fish in Alaska waters, because of restriction or limitations placed upon charter boats. I already see some of that in S.E. communities.

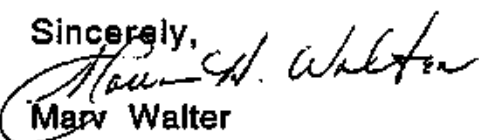
Alaska has some 600,000 residents in the state. That number is less than the size of many nonresident cities or communities. Alaska waters are vast and productive waters, but nonresidents receive major debate when they spend money to enjoy the fishing Alaska has to offer. I hear in the press and elsewhere how nonresidents are taking so much fish out of state. Yet, where does the major commercial share of the fish end up? It is overseas and out of state.

Times are changing and things need to change with them I understand that fact. I believe the wrong people are getting the hammer in the process. Tourism is the reality today and in the future in Juneau, Alaska and S.E. Communities. It is wrong to blame charter boats and nonresidents for taking a high percentage of the fish. The bi-catch for commercial boats is higher than all sportfishing and charter fishing combined. It's time to take a good look at halibut, the chinook and coho salmon issue in relationship to sportfishing by anglers, whether it's resident or nonresident participants. I believe the opportunity for the sportsman to catch fish should be encouraged not limited by commercial interests. The charter boat industry is only a vessel of transportation on the water, which benefits residents and nonresidents alike.

I think it's time the North Pacific Fisheries Management Council has equal and proper representation. At the present time that is not the case. I've written letters to appropriate offices noting that fact, but officials have responded with general statements which ignore reality.

I ask you to take a realistic look at the halibut situation in Alaska and not act in a manner which holds charter boats responsible.

Sincerely,


Marv Walter

1340 Fritz Cove Road
Juneau, Alaska 99801

F/V Kruzof

P.O. Box 3302 ◆ Seward, Alaska 99684
Phone (907) 224-5584 ◆ Fax (907) 224-5572 ◆ Email Kruzof@ptialaska.net

January 25, 2000

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

RECEIVED

JAN 25 2000

Dear Chairman Lauber,

N.P.F.M.C**RE: HALIBUT ALLOCATION FOR CHARTER FLEET**

We support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically we agree with the Council decision made in 1997, and believe council should also use effective management measures to keep the charter fleet within their allocation. Any other action by the council will result in less halibut for consumers and impact seafood industry worker and companies that have invested in Alaska halibut.

We participate in the halibut fishery as a commercial vessel owner/operator employing 5 other crew members. Since the implementation of IFQs we have purchased or traded over \$420,000 worth of halibut IFQs. As a major income source we are committed to this fishery.

All those who rely on a sustainable resource for a living, understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen and processors have been responsible stewards of the halibut fishery and have fished under rules adopted by the IPHC since 1923. The commercial fishery has a history of paying for resource management through *quota reductions, trip limits, voluntary lay-up programs, and mandatory supplication of detailed logbook and fishing information*. The commercial harvest is also assessed a 3% fish tax benefiting the state and coastal communities where the product is processed.

If the commercial harvest is not maintained, the volume of fish for the public to legally purchase either in the grocery store or off the menu is threatened. Threatening our commercial resource without any controls on the charter fleet encourages a black market and/or under ground trade of halibut by those who are able to catch excessive volumes of halibut from charter boats. Consequently we also advocate controls on the amount one person can catch in a year either through a tag program or other tracking method. A tag program could also facilitate accurate and valid documentation of number and pounds of fish taken. This is currently lacking given the status quo.

In spite of our commercial interest, one cannot deny the growing economic impact of the charter boat industry. However it is not feasible for the charter fleet to survive favorably in business without instituting a moratorium coupled with a fleet management program. Like the commercial fleet, the charter boats also need controls and limits to insure a successful business and descent area management.

We encourage the council to keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth. Consistency in council policy making would come greatly appreciated at this time.

Sincerely yours,

Jim & Rhonda Hubbard
Jim and Rhonda Hubbard

Dave Llewellyn
2341 Foxhall Drive
Anchorage, Alaska 99504
January 23, 2000

RECEIVED
JAN 25 2000
N.P.F.M.C

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

Dear Mr. Lauber:

I have been a resident of Alaska for twenty years and each year take two or three fishing charter trips in Cook Inlet or Kachemak Bay. These charter trips and other fishing trips I take in my boat are to catch my annual halibut subsistence.

The fishing charters I take each year and many others like me are great experiences and they contribute substantially to the local and state economies, especially given the small number of halibut taken. These small business charter fisheries are not only assets for state residents but are also important to our tourist activity during the summer season.

As a stakeholder and user of this PUBLIC fishery resource, I am concerned about the guideline harvest level (cap) proposals being considered for the guided sport fishery by the North Pacific Fishery Management Council. The commercial halibut fleet pursuing this restriction takes over 60 million pounds annually, while the guided sport fishery takes only 3-4 million pounds. It is also my understanding that over 65 percent of the commercial halibut fleet is owned by non-residents. Further, 13 million pounds of halibut are wasted annually as commercial incidental catch.

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

I request your support in ensuring that the recreational angler access to this strong PUBLIC resource not be restricted only to provide a few more halibut for commercial harvest.

Sincerely,


Dave Llewellyn

January 20, 2000

Hon. Rick Lauber, Chair
NPFMC
605 W. 4th Ave. Ste 306
Anchorage, Ak 99501

RECEIVED
JAN 25 2000
N.P.F.M.C.

RE: Halibut

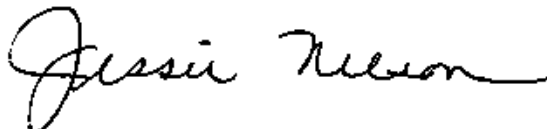
Dear Chairman,

I am writing to emphasize the importance of halibut to us as commercial longliners in the Gulf. We have invested significantly into halibut IFQ's over the years. We expected that the IFQ's would fluxuate with the resource abundance but not with other users getting a larger cut before IFQ quotas are figured. It is even worse to think this larger cut will not be based on the biomass which is the way every other fishery quota is set. This is the only sensible and responsible way to manage fisheries.

The commercial longline halibut fishery is very stable now. We have worked most of the kinks out of the new IFQ system and fishermen know what to expect. Banks loan on IFQ purchases. Let's not tinker with that. It is not growth of industry to take from one and give to another.

Thanks for your consideration of these comments.

Sincerely,



Jessie Nelson
Box 130, Homer, AK 99603

cc: Gov. Tony Knowles

January 20, 2000

4055 Sweetwater Road
Bow, WA 98232-9585

Honorable Rick Lauber, Chairman
North Pacific Fisheries Management Council
605 West Fourth Avenue, Suite 306
Anchorage, AK 99501

RECEIVED

JAN 26 2000

Dear Chairman Lauber:

N.P.F.M.C

I am writing because of my deep concern about the proposal to allocate halibut to the charter fleet. Setting an increase in allocation for the charter boats over the 1995 base and letting the commercial long liners receive reductions in the quota seems utterly unfair to me and is a sure way to destroy the commercial long line fleet.

My husband and I have fished in Alaska waters since 1973, together raising two children on the boat who are also still part of the commercial fishing family in Alaska. Commercial fishing is our only means of employment. We have a huge investment in our family business. We also support the businesses in Southeast Alaska during five months each year. We lost our right to fish for halibut through limited entries and government regulations. We did not qualify for halibut quota even though we had invested in and fished the derbies for seven years. We had no choice but to purchase halibut shares if we were to continue with the fishery. The purchase brought hardship on our family but we anticipated an insurance of continued income in the fishing business once our loans were paid off. We had just incurred more reductions in salmon fishing and needed to secure more income to compensate that loss, too. What price are the charter boats going to pay for their halibut quota. If they want more quota, it seems only fair that they go out and purchase their own just like we did.

The charter fleet has gone unchecked far to long. They don't need more quota, they need a reduction in the amount of boats and participants and a cap on their impact on the resource. The proposal to allocate the charter fleet even more fish than the 1995 base means the commercial long line quota will be less. How can your council approve stealing my legally purchased halibut shares and giving them to the charter fleet.

It has also been mentioned that the council believes the commercial fleet could adapt more easily than the charter fleet to a reduction in the quota. I am already going to take a 20% reduction in my halibut share plus incur a new tax for the 2000 fishery season. thanks to the Halibut Commission. I can assure you both reductions will not be easy to adapt.

I hope that you will take into consideration the above letter and take seriously your decision in this matter. Commercial fishing is an integral part of the health of Alaska.

Sincerely, *Becky Haun*
Mrs. Becky Haun
Owner/Operator FV/CINNABAR

cc: *Governor Tony Knowles*

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

RECEIVED

JAN 26 2000

Dear Chairman Lauber,

N.P.F.M.C

I would like to address the halibut guideline harvest level management plan (GHL) for the charter boat industry.

I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charter boats in 1997.

I am part of a family, wholly dependent on commercial fishing. We are dependent on the commercial halibut fishery for approximately 65% of our annual income. To remove the halibut charter harvest from the abundance-based management has the potential to reduce the commercial harvest and could also reduce the value of the IFQ's that we hold. Based on the stability promised by the government, we have invested a portion of our 3 children's savings and the larger portion of our savings in the IFQ program. At this time, we have around \$300,000 invested in the program with a balance owing on some loans of approximately \$150,000. To be able to repay these loans and to repay the children's savings we need to be assured of the stability of the program.

Commercial halibut dollars have a very positive influence on our community. The monies from the local commercial fishermen flow through each local business. To reduce the commercial harvest will have a negative effect on our community as a whole.

We who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have shown themselves to be responsible stewards of the halibut fishery and have fished under the rules adopted by the IPHC since 1923. To remove the halibut charter harvest from abundance based management is poor public policy and gives the charter operators no incentive for conservation. Abundance based management has been a corner stone of the successful management program and it would not be wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

Sincerely,

Sheryl A. Smith

box 1741
Wrangell Ak.

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

Dear Chairman Lauber,

I would like to address the halibut guideline harvest level management plan (GHL) for the charter boat industry.

I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charter boats in 1997.

I am part of a family, wholly dependent on commercial fishing. I am a 16 year old who has been deck handing on my fathers boat for 6 years and have now invested part of my savings in IFQ's. I am dependent on the commercial halibut fishery for approximately 75% of my annual income. To remove the halibut charter harvest from the abundance based management has the potential to reduce the commercial harvest and could also reduce the value of the IFQ's that I hold.

Commercial halibut dollars have a very positive influence on our community. The monies from the local commercial fishermen flow through each local business. To reduce the commercial harvest will have a negative effect on our community as a whole.

We who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have shown themselves to be responsible stewards of the halibut fishery and have fished under the rules adopted by the IPHC since 1923. To remove the halibut charter harvest from abundance based management is poor public policy and gives the charter operators no incentive for conservation. Abundance based management has been a corner stone of the successful management program and it would not be wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

Sincerely,



box 1741
Wrangell, AK
99929

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

RECEIVED

JAN 26 2000

N.P.F.M.C

Dear Chairman Lauber,

I would like to address the halibut guideline harvest level management plan (GHL) for the charter boat industry.

I am writing to urge you to stay with the original guideline harvest level action that was set for halibut charter boats in 1997.

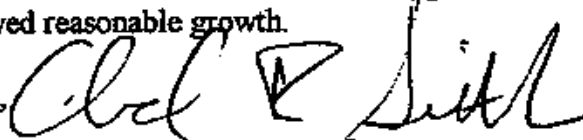
We are a family, wholly dependent on commercial fishing. We have invested heavily in IFQ's. We have approximately \$300,000 in the IFQ program with debt of about \$150,000 at this time. We made the decision to invest our (and our children's) savings and to incur debt based on the stability promised by the government. We are dependent on the commercial halibut fishery for approximately 65% of our annual income. To remove the halibut charter harvest from the abundance based management has the potential to reduce the commercial harvest and could also reduce the value of the IFQ's that we hold and thereby reduce the value of our boat and our business as a whole. This could make it hard or even impossible to repay the above-mentioned debt.

Commercial halibut dollars have a very positive influence on our community. The monies from the local commercial fishermen flow through each local business. To reduce the commercial harvest will have a negative effect on our community as a whole.

We who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have shown themselves to be responsible stewards of the halibut fishery and have fished under the rules adopted by the IPHC since 1923. To remove the halibut charter harvest from abundance based management is poor public policy and gives the charter operators no incentive for conservation. Abundance based management has been a corner stone of the successful management program and it would not be wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

Sincerely,



Chad Smith
Box 1741
Wrangell Ak.
99929

January 22, 2000

RECEIVED

JAN 26 2000

N.P.F.M.C

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

Dear Chairman Lauber,

We should give the charter fleet the percentage of Halibut allocated in 1997 which was 125% of the halibut caught in 1995. They should also take there percentage after the mortality and wastage tally as the commercial fleet does. Any pounds added to the sport charter quota after said time would not be fair to the commercial industry IFQ holders that have had to pay for commercial poundage and who are still paying for their IFQ's.

I have been fishing since 1981, halibut has been a big percentage of my income. I have supported up to three deck hands, and now support one. I feel that if there are any cuts in the commercial allocation and it is given directly to the sport charter, it would cause me to drop my deck hand and keep it in the family because of our IFQ payments. My payments would be the same and my profits less.

For several years the commercial halibut industry has set back and let the sport charter industry grow even after we were allocated our poundage, through the IFQ program. I feel that the 1997 decision is more than fair and if the sport charter would like to grow they should buy IFQ's like the rest of the commercial industry.

Please help.


Alan Reeves, IFQ owner
P.O. Box 741
Wrangell, Alaska 99929

cc: Governor Tony Knowles, State of Alaska

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

January 22, 2000

RECEIVED
JAN 26 2000
N.P.F.M.C

Dear Chairman Lauber,

I am writing to urge you to stay with the original guideline harvest set in 1997, and establish effective management measures to keep the charter fleet within their allocation.

My family and I depend on the commercial halibut fisheries, it is a significant part of our annual income. We have invested heavily in IFQ because of the stability promised by the government. Reducing the commercial harvest will reduce the value of the IFQ and will make an impact on the ability to pay off IFQ loans.

The commercial halibut fisheries has been established for many years. The commercial fisherman have been responsible stewards of the fisheries and have fished under rules adopted by the International Pacific Halibut Commission since 1923. While tourism is a growing industry, we should not allow for the charter business to take away from those of us who take out loans and pay for our IFQ. Let us keep the program that was decided in 1997, giving them a generous 125% of 1995 allocation.

Again I ask you to please stand by your initial decision. I appreciate your consideration.

Sincerely,

Deanna Reeves

Deanna Reeves, IFQ owner
P.O. Box 741
Wrangell, Alaska 99929

cc: Governor Tony Knowles, State of Alaska

Brian G. Lee

RECEIVED

HC 03 Box 8385
Palmer, AK 99645

Phone 907-746-0868
Fax 907-746-0868

JAN 26 2000

January 24, 2000

N.P.F.M.C

Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West Fourth Ave, Ste 306
Anchorage, Alaska 99501-2252

I am a commercial halibut and salmon fisherman from Palmer, Alaska. I have depended on commercial fishing for my livelihood for 29 years. I depend on halibut fishing for any where from 35 to 50% of my annual income. I received no IFQ allocations when the program was begun in 1995. Never-the less, I felt then and still feel, that the IFQ program is a good conservation tool and a very positive way to manage the halibut fishery. I made a simple business decision to enter the IFQ program in 1995. I invested my own money and received a loan from the state of Alaska to enable me to buy the pounds I wanted to enter the IFQ program. I invested then because I felt that there was a certain amount of stability in the halibut fishery. My commercial halibut dollars are spread throughout the Palmer, Wasilla and Anchorage area businesses.

I have fished enough years to fully recognize the natural fluctuations that occur in any given fishery, I have no problem accepting a cut in what I can catch, as long as it is biologically needed. My livelihood depends on a healthy resource and I want it to stay that way! I accept the 26% reduction in the commercial halibut harvest in area 3A if that is what the biologists feel is needed to conserve the resource. I have always backed the abundance based management style that the state of Alaska has adopted in managing it's fishery resources. I feel strongly that ALL user groups need to be included in that management style.

Reducing the commercial halibut harvest unfairly, i.e. allowing unrestricted access to the commercial charter industry while restricting the commercial harvest, is extremely poor public policy. I feel that the 1997 decision by the council to allocate 125% of the 1995 harvest to the charter industry is generous and allows reasonable growth opportunities for them.

I would appreciate your consideration of this letter. Commercial fishing provides many jobs in the Mat-Su area and benefits the state in many ways. I feel that there is plenty of opportunity for both the charter and commercial industry to operate together in a manner that benefits both.

Sincerely,



Brian Lee

to Mr Rick Lauber
chairman NPFMC
605 West 4th Ave, ste 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

1-22-00

RECEIVED
JAN 26 2000
N.P.F.M.C

Mr chairman, as a commercial halibut deckhand and operator of my own halibut longline operation for the past 12 years, I have a genuine interest in resolving the amount of Pacific Halibut needed to satisfy the unregulated growth, and demands of the halibut charter industry,

Commercial fishing income is the sole sustinance for me, my wife, and 3 children.

We depend upon halibut for half of our annual income. When abundance of halibut changes, so does our portion.

It is unthinkable for us that the portion taken in the halibut charter industry is not regulated.

Due to the chronic demands for increasing resource extraction by elements of the charter fleet, and no end to the increasing volume of participants entering the charter industry, we sincerely request that the NPFMC establish a guided halibut limit of 125% of the 1995 charter catch for areas 2c and 3a.

All users of halibut need the assignment of a fixed percentage of the available harvest. The purpose of the I.F.Q. system was to stabilize our fishery. Please avert the eclipsing threat this new and rapidly expanding user group poses to our existing longline halibut fishery.

sincerely,

Richard J. + Merridy L. Davis

cc Gov Tony Knowles

*RICHARD J. + MERRIDY L. DAVIS
2347 KEVIN CT. JUNEAU ALASKA
99801*



**Douglas Indian Association
Tribal Government**

Box 240541 Douglas, Alaska 99824

January 19, 2000

RECEIVED

JAN 26 2000

N.P.F.M.C

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

Dear Mr. Lauber:

The Douglas Indian Association (DIA) is a federally recognized tribe with over 400 members who are represented by an officially elected nine member Council. At a regular business meeting conducted on January 10, 2000, the DIA Council unanimously voted to support the Halibut Coalition's position that the North Pacific Fishery Management Council keep the guideline harvest level (GHL) for commercial charter boats at 12.5% of the 1995 harvest.

Our members depend upon sustainable resources in our traditional waters. As responsible stewards of halibut and other fisheries, we urge the establishment of effective management measures that appropriately prevent halibut stock depletion through the charter fleet harvest.

Sincerely,

Clarence A. Laiti, Chairman
DIA Environmental Council

cc: Governor Tony Knowles
Commissioner Frank Rue, ADF&G



Dignon Company, Inc. RECEIVED

AN ALASKA CORPORATION

WILLIAM A. DIGNON, PRESIDENT

ROBERT E. DIGNON, VICE PRESIDENT

JAN 27 2000

PHONE 206-448-6877

FAX 206-448-9664

TELEX ITT 493-2424

8

705 TERMINAL SALES BLDG.
SEATTLE, WA 98101

N.P.F.M.C

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

January 25, 2000

We Support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation. Any other action by the Council will result in less halibut for consumers and impact seafood industry worker and companies that have invested in Alaska halibut.

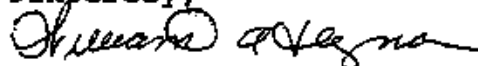
We have a plant located in Hoonah, Alaska named Hoonah Cold Storage. In a typical year, we employ 40 workers. Our facilities provide sustainable jobs in our community and benefits many other businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. We also export halibut overseas which helps the U. S. balance of payments. Commercial halibut dollars flow through almost every business in town. Reducing the commercial harvest will reduce the value our investment in both capital assets and marketing. In addition it will result in less raw fish tax for both communities and the state; reduced sales tax for goods we purchase; and possible reduced property taxes.

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

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

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

Sincerely,



William A. Dignon
President

CC; Governor Tony Knowles, State of Alaska
P. O. Box 110001, Juneau, AK 99811-0001

RECEIVED

JAN 26 2000

N.P.F.M.C

January 24, 2000

To: North Pacific Fisheries Management Council
Chairman Richard Lauber

Dear Chairman Lauber,

My parents have been commercial longlining for halibut since 1975 in area 2-C. I am 14 years old and have worked with my family on the boat fishing for years. Our family supported the implementation of the IFQ program even though we weren't allocated very many pounds at the inception of the program.

Since then my parents and I have made our largest investment ever purchasing more halibut IFQs to support our family. My family and I depend on the commercial halibut fishery for about 70% of our annual income. We have invested heavily in IFQs because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQs and our boat. It will also impair the ability of people to repay both boat and IFQ loans. As you can well see we are very concerned about the uncontrolled growth in the charter industry.

Commercial fishermen brought this issue to the attention of the Council seven years ago, urging that action be taken while halibut quotas were increasing so that a head-on collision between gear groups could be avoided. Commercial fishermen asked that an upper bound be placed on expansion of charter halibut harvest, and that some measures be implemented to restrain the charter fleet to that upper bound. In 1997, the Council identified the upper bound as a Guideline Harvest Level that allowed the charter fleet some room for growth and tasked industry members with developing management measures to control their growth. Three years later, commercial fishermen are still asking for the same thing: place an upper bound on expansion of the halibut charter fleet and adopt effective measures to restrain the charter fleet to that upper bound. It is way beyond time to act on this issue. The Council and the National Marine Fisheries Service has allowed the charter fleet to expand at the expense of the commercial fleet by repeatedly delaying action on this issue. Further delays are unacceptable!!!

The 2C GHJ should be based on 1995, as was identified by the Council in 1997. Charter halibut numbers for 1999 indicate that the 1998 numbers were either inaccurate or an inexplicable spike in charter halibut harvest. The 1995 data represent the best available information and should be used by the Council. The North Pacific Fishery Management Council should keep the charter allocation at the 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth. We should all share the pain and share the gain as the halibut quotas go down or up.

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

The ADF&G sponsored option to grant the charter fleet a fixed or stair stepped allocation in

pounds, which is not directly linked to abundance, is contrary to Alaska's management principles and undermines the State's management authority. Establishing a priority preference for charter vessels will not only harm commercial users, but also local sport users and subsistence users.

We feel strongly that it was inappropriate for the ADF&G Sports Division to advocate on allocation issues. The ADF&G Sports Division should stick to management not allocation. What they were doing directly discriminates against the commercial longline fleet!

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

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

Sincerely, *Jesse Remund*

Jesse Remund, P.O. Box 8147, Port Alexander, Alaska 99836

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

Please make copies for all NPFMC members to read. Thanks!

January 24, 2000

To: North Pacific Fisheries Management Council
Chairman Richard Lauber

RECEIVED
JAN 26 2000
N.P.F.M.C

Dear Chairman Lauber,

We've been commercial longlining for halibut since 1975 in area 2-C. We supported the implementation of the IFQ program even though we weren't allocated very many pounds at the inception of the program.

Since then my husband and I have made our largest investment ever purchasing more halibut IFQs to support our family. My family and I depend on the commercial halibut fishery for 70% of our annual income. We have invested heavily in IFQs because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQs and our boat. It will also impair the ability of people to repay both boat and IFQ loans. As you can well see we are very concerned about the uncontrolled growth in the charter industry.

Commercial fishermen brought this issue to the attention of the Council seven years ago, urging that action be taken while halibut quotas were increasing so that a head-on collision between gear groups could be avoided. Commercial fishermen asked that an upper bound be placed on expansion of charter halibut harvest, and that some measures be implemented to restrain the charter fleet to that upper bound. In 1997, the Council identified the upper bound as a Guideline Harvest Level that allowed the charter fleet some room for growth and tasked industry members with developing management measures to control their growth. Three years later, commercial fishermen are still asking for the same thing: place an upper bound on expansion of the halibut charter fleet and adopt effective measures to restrain the charter fleet to that upper bound. It is way beyond time to act on this issue. The Council and the National Marine Fisheries Service has allowed the charter fleet to expand at the expense of the commercial fleet by repeatedly delaying action on this issue. Further delays are unacceptable!!!

The 2C GHL should be based on 1995, as was identified by the Council in 1997. Charter halibut numbers for 1999 indicate that the 1998 numbers were either inaccurate or an inexplicable spike in charter halibut harvest.

The 1995 data represent the best available information and should be used by the Council. The North Pacific Fishery Management Council should keep the charter allocation at the 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth. We should all share the pain and share the gain as the halibut quotas go down or up.

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


The ADF&G sponsored option to grant the charter fleet a fixed or stair stepped allocation in pounds, which is not directly linked to abundance, is contrary to Alaska's management principles and undermines the State's management authority. Establishing a priority preference for charter vessels will not only harm commercial users, but also local sport users and subsistence users.

We feel strongly that it was inappropriate for the ADF&G Sports Division to advocate on allocation issues. The ADF&G Sports Division should stick to management not allocation. What they were doing directly discriminates against the commercial longline fleet!

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

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

Sincerely,



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

Sincerely,



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

cc: Governor Tony Knowles, State of Alaska, PO Box 110001, Juneau, AK

Nov. 30, 1999

RECEIVED
JAN 27 2000
N.P.F.M.C

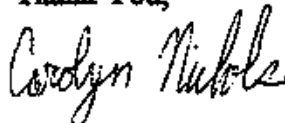
Chairman, Richard Lauber
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK. 99501

I support the option that provides for 125% of the 1995 catch of the guided sport harvest. I am for an abundance based management program for the guided sport fleet. I have watched the guided sport fishing industry grow very quickly and feel that with the longline fleet under the restrictions of the IFQ management program that it is odd that you would allow another commercial sector to grow unchecked at the longline, non-guided sport, and subsistence fleets expense. It seems too me that the guided charter fleet should have an allocation based on abundance just like all other fisheries in Alaska.

My family longlines for halibut under the IFQ program. We fished for many years under the previous management system as well. I feel that if resource based cuts need to be made that all user groups should bear the burden of conservation. I hear Governor Knowles say that the guided sport industry cannot adjust to quota changes as easily as the longline fleet. This idea seems pretty odd in that both our crew and ourselves depend on these jobs to feed our families and pay our bills. We live and work in Alaska and I do not see how the guided charter operators have any needs that are more special than the continued welfare of our families. Many longliners have made substantial investments into the IFQ program. Any council action that reduces quotas to the longline fleet for reasons other than conservation will create hardships in what is mostly family businesses that can't absorb more losses.

There should be an allocation for the charter fleet, but it needs to be done in a way so as not to harm the historic participants. I definitely would like to see the Council adopt the Guideline Harvest Level previously passed of 125% of the 1995 level. There does not need to be more time to study this, as 6 years should be sufficient. The state harvest data and the charter logbook program both show a DOUBLING of catch from 1997 to 1998 in area 2C. I feel that this growth allowed to continue unchecked is discrimination against all other user groups of the halibut resource.

Thank You,



Carolyn Nichols
305 Islander Dr.
Sitka, AK 99835

Stanley Hjort
Box 828
Petersburg, AK

RECEIVED
JAN 27 2000

N.P.F.M.C

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

Sir:

I support an allocation to the Charter Fleet based on abundance and historic levels in accordance with the decision you made in 1997 and urge you to establish measures to keep the charter fleet within their allocation.

I have a combined total of one hundred fifty thousand dollars (\$150,000) invested in IFQs, gear and boat for the halibut fishery including an NMPS loan that I may not be able to pay in a year of low abundance if the charter fleet gets a fixed allocation.

A further reduction of commercial harvest will reduce the value of our IFQs and boats. As the charter catch grows it will further reduce the ability of personal use and subsistence users to provide food their families need.

The money the halibut fleet spends circulates more times in the local economy and provides more jobs than a charter fisherman who takes the fish and gets on an airplane leaving the state. The majority of the IFQs are held by local fishermen.

The 125% of the 1995 harvest allocation to the charter fleet was a generous compromise.

Respectfully

Stanley Hjort
IFQ Holder
Petersburg, Alaska
Stanley Hjort

cc: The Honorable Tony Knowles, Governor
State of Alaska

Thomas J. Dawson
Three Eagle Charters
8120 Pinewood Drive
Juneau, Alaska 99801
(907)789-9124

RECEIVED
JAN 27 2000
N.P.F.M.C.

January 25, 2000
North Pacific Fisheries Management Council
Richard Lauber, Chair
605 West 4th, #306
Anchorage, Ak 99501-2252

Dear Chairman Lanber:

I currently own and operate a charter business in the Juneau area and am a member of the Juneau Charter Boat Operators Association (JCBOA). I have also been a commercial fisherman in years past, and have always been a lifelong sportfishing enthusiast. I am very concerned about the erosion that has been taking place in the sportfishing arena, and what that now translates into in terms of my current chartering livelihood.

I am a lifelong Alaskan, born in Petersburg and raised in Juneau/Douglas. My parents met in Petersburg. My mother was a nurse (from a family of ten) and my father a bakery owner (from a family of eighteen). My father served in the Aleutians during WWII. Mom and Dad settled in Douglas soon after the war and raised their family of seven children. My best memories are those childhood years growing up near the water, on boats and fishing. And best of all, catching the fish that was served as dinner that night on the table. After I married, I was able to share that same experience and excitement with my children. Taking the boat out, bbq's in some secluded cove, and bringing fish home for dinner, and an extra one or two for the elderly neighbors who couldn't get out or afford it at the store. I look forward to again sharing it with grandchildren.

I retired from state employment (Public Safety) in 1995. Anticipating this retirement, I started a small charter business in 1992. After retirement, I invested quite a substantial amount to up-grade my charter business. Little did I know that politics and big money (commercial fisherman) would have such a devastating and negative impact on a public resource and my charter business to the extent it has today. (Keep in mind I did commercially fish - so I do know the issues and the commercial mind set). And I'm sorry to see that those charged and entrusted to protect the public resource for all user groups has failed to do so, and up to now has gotten away with it. It does not take a rocket scientist to see why. Money talks, and reason gets blown in the wind, fanned by the commercial money machine. The apathy and no power base to work from of the average sportfisherman has left a void in the accountability process. I now see that slowly changing, due in part to efforts such as the group I have joined, and many others similarly starting up around the state and making their voice heard.

But of course, then again enters the roar of the commercial Money Machine and politics to try and twist the facts and figures with a smoke and mirrors effort to say that commercial fishing is not a problem. "It's them darn sportfisherman who are causing the problem". Only they spell it with the words "charter operator" in front of it. They've said it loud and long enough that people actually started to believe it. (remember the naked king and the kings new clothes). Well, now, as in that old children's story, the naked truth shall come forth.

After reading thru all the information I can find regarding the arguments for and against all the various proposals regarding halibut GHF or a guided IFQ, it is obvious no one has thought through the implications and complications these ideas represent. The reason I say this is because I believe if you start out with the flawed premise (like that poor king), that a charter operator is a commercial fisherman and should be regulated as such, then everything that follows simply makes matters worse. No problem can be fixed until you first identify it correctly. The problem(s) simply haven't been correctly identified yet. Charter operators are incorrectly identified or mislabeled as a commercial fisheries, and the commercial fisherman are pushing this issue because it gives them the added leverage to regulate charters to their advantage.

From year to year I have no idea or control over what my clients will want, nor how many halibut other sportfishermen will catch. A sportfisherman should be allowed to sport fish halibut from whatever legal platform he chooses to fish from, whether he owns it, leased it, rented it or chartered it shouldn't matter. If the sport fishery is open then any sport fisherman should be able to fish. A sport catch is a sport catch. Why should I as a sportfisherman/charter operator need an IFQ if I do not intend to sell fish. Why would I even need an IFQ in a sport fishery if I am not catching the fish, not even allowed while chartering. The fish are caught by clients, licensed sportfishermen, they are not my fish nor do I retain them. If an areas GHL has been reached, then close the area, but do not target or discriminate within the sportfishery.

Arriving at a fair GHL is another sore subject now raising it head among sportfishermen. To me it is incredibly inconceivable anyone would even consider to set a GHL for sport catch at less than the by-catch and waste of the commercial fisheries. I cant think of any other business that accepts this percent of waste as acceptable numbers, and calls the business successful. What is a fair GHL for sport catch. It would definitely be more than it is but it would probably never reach a 50/50 split. I think the way the allocation is done now is backwards. Instead, allow the sportfishery to set the course for awhile. Allow it to grow from year to year to see where it plateaus. Adjust the commercial catch to maintain the overall halibut GHL after the sport level is established. Over the past years, every time the commercial GHL rose, they enjoyed the gravy while the sport catch maintained status quo. Sportfishermen felt the pain but had no voice that anyone listened to. The commercial Money Machine was totally overpowering and got use to having it all. Now they think they're entitled simply because they've had it for so long, when there was nobody to stand up for the little sport guy because he wasn't loud enough. The slowly dwindling allowable sport catch over the years has had a affect that I don't hear many discussing or even acknowledging. With no voice for the sport fisherman (that anyone listened to) he acquiesced. He then quit buying the family boats. Why spend the money for a nice boat and related gear if the sport catch rate is reduced further each year, or is so over fished by the commercial industry that you can't count on any numbers left that have any meaning that the sport industry can count on. This is a very real economic loss to the community. It use to be the norm that a sportfisherman could catch halibut in the local Juneau area. Now it's the exception. Icy straight is so commercially over fished there's very little escapement into the local area. And a lot of the sport caught halibut show the signs of commercial waste, smaller halibut ripped off commercial hooks (mouth damage) and tossed back, traded for a bigger fish. If the commercial fisherman wants more fish, tell him it's in his by-catch and waste, and maybe he'll have the incentive to clean up his act. Can you imagine the sport fishery with an equivalent percent of by-catch and waste. Hard to isn't it. Well, why accept it in the commercial fishery?

More charter regulations isn't the answer. Enforcement of the current rules already on the books is sorely lacking. I see and hear of blatant violations every year, many are reported yet many go unchallenged, or there are no consequences. I wonder who's minding the store.

The main thing to understand about the charter operator is that not all charter businesses have the same clients or goals. My business is based on client-days and client-trips and client satisfaction. It is not geared around pounds of fish or numbers of fish caught. Often it has nothing to do with fish at all. I am not in competition with other operators to be the "high-liner" for any given day or trip. Each trip is a special experience between myself and my clients. I attempt to show them the best of what they are here to see and do, to make their charter a special experience they will never forget. One they will want to go home and tell their friends about, to convince them to come to Alaska, and hopefully experience a charter with me that meets or exceeds the stories they were told. I sell the experience not the fish....and I hope I don't suffer from the NPFMC decisions because of it.

Respectfully,

Thomas Dawson

RECEIVED

JAN 28 2000

Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306

N.P.F.M.C

I am writing to you in regards to the Halibut IFQ fishery and the charter fishing business allocation. I am in favor of granting the charter fleet a number that is based on abundance and based on the history of the charter fleets recorded landings.

With the down fall of the salmon market and the questionable runs in the western regions I have made a substantial investment into the halibut ifq program at the onset of it. This investment was a great financial risk to me and right now is about the only stable fishery out there. And that's just for the present. Who knows how long this will last?

The stocks are at an all time high and as we all know nothing lasts forever and will eventually decline. So, what happens to the rest of us who don't have a fixed allocation and who have to stand by and watch as the charter business continues to harvest fish at a rate based on this all time high stock level? And regardless of mine and others financial situations does it seem wise to deviate from the harvest level based on abundance of the resource which has proven it's reliability since the rules were adopted in 1923?

The 12.5% of the 1995 harvest allocation set for the charter business in 1997 seems to be a fair compromise and would allow growth within the charter industry.

Thank you for your time on this matter and keep in mind that many of the ifq holders are not millionaires but just simple fishermen trying to make a living.

Sincerely,
George R. Veneroso

RECEIVED

JAN 28 2000

N.P.F.M.C

STANLEY N. JONES
P. O. BOX 1249
HAINES, ALASKA 99827
25 January 2000

Mr. Richard Lauber, Chairman NPFMC,
1000 West Fourth Ave., Suite 306
Fairbanks, AK 99701-4252

Dear Mr. Lauber:

My family has been involved in the 2C halibut fishery since 1978 and the 3A halibut fishery since 1995. We have seen marked fluctuations in the biomass and TAC of halibut over the years. Witness the tremendous increase in participation in the commercial fishery to the point of changing the fishery to derby style fishing. Now the fishery is threatened by a new type of commercial operation with the theoretical ability to harvest the entire TAC. In 2C it already has exceeded to 1.75 million pounds, over 14% of the TAC for 1998. At the present time the biomass seems to be at a high level and great discretion should be exercised in any allocation of the total resource that would significantly restrict or eliminate the historical commercial harvest. I spent \$186,000 on QS in 1995 & 1996, thinking it would be an investment in work and an allocated percent of the TAC and that a reasonable agreement was being made with the sport charter fleet. However the sport charter catch and participation has increased and this year 2000, the commercial TAC is being cut by approximately 2,000,000 and 5,000,000 pounds in areas 2C and 3A respectively and I will be losing the right to harvest approximately 1,000,000 pounds of halibut. I think the allocation should be based upon a fixed per cent of the sport charter harvest, rather than a fixed poundage that is not based on the resource quantity. At the time we were granted or bought our QS we thought we had earned or invested in a certain percentage of the harvestable biomass over a long period of time. Now we realize that our position has been a very theoretical maybe! At best we know it is going to be a lower per cent percent of the sport charter operations.

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

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

Sincerely,

Stanley N. Jones

Jan. 27, 2000

To: Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
Fax: 907-271-2817

From : Kenneth Adams
Commercial Fisherman, Cordova, Alaska
Phone/fax: 907-424-5456

RECEIVED
JAN 28 2000

N.P.F.M.C

Dear Chairman Lauber:

I'm writing with respect to the halibut allocation issue presently before the NPFMC. I urge your support for the maintenance of the 1997 guideline harvest limits previously assigned by the Council for the halibut charter fleet and the means to keep that gear type within that allocation.

I started fishing for halibut with a very small boat in 1985 and gradually worked up to a larger vessel and to where I was at least catching the average for my vessel class size. The very modest initial quota share allocation I received does not adequately reflect my harvest potential at present. It is much more reflective of my harvest ability with the smaller vessel I had to use during the early qualifying years for the IFQ program.

My point is this. Even though I have the ability to greatly increase my harvest rate, I am prevented from doing so by the IFQ program. In view of the inflexible nature of the IFQ program and the stability that program was supposed to bring to the fisheries involved, I bristle at the attempts of halibut charter fleet members to gain a greater allocation from that issued to them by the Council in 1997 through purely political means.

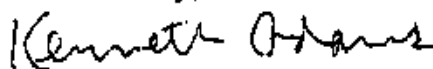
There may indeed be more competition in the ranks of the charter fleet these days and they very likely have the ability to catch more fish but a ceiling on their harvest needs to be maintained, much as I am confined to live within my meager allocation...or purchase more quota share. Maybe the Council ought to provide a means for the charter guys to buy quota shares from the IFQ pool and let those purchases be adapted to the charter fleet?

Please maintain abundance based resource management, not politically based resource management. The implementation of the IFQ program drastically reduced my participation in the halibut fishery. I felt that hurt directly. An increase in the GHL for the charter fleet beyond what the

Council adopted in 1997 further erodes my participation in the fishery and further reduces the much needed fisheries diversification opportunity that many small boat Alaska resident fishermen sorely need.

If you cannot hold the line and say no to the charter fleet, perhaps you should say no to the entire IFQ program. Scrap the program, start the process of remuneration for those who bought in, and let's return to the open fishery of years past. At least those of us who need fishery diversification opportunities would have a chance at making a decent halibut trip on occasion to offset the downturn in salmon or other fisheries.

Yours truly,



Kenneth Adams

c.c. Gov. Tony Knowles

Kenneth R. & Karen McGee
2390 Engineers Cutoff Rd.
Juneau, AK 99801

1-10-00

RECEIVED
JAN 28 2000
N.P.F.M.C.

Attn: Chairman Lauber
and members of the
North Pacific Fisheries Management Council.

Members of the council,

It is unthinkable to allow the recreational halibut catch to continue without boundry or limit.

Help stabilize the commercial halibut fishery by asigning a small fixed percentage of halibut to the recreational fisheries.

Please act now to protect our dependance upon, and investments in the commercial halibut I.F.Q. fishery.

We the undersigned urge the N.P.F.M.C. to assign the halibut charter fisheries an allocation 125% of the 1995 harvest, and we fully support the efforts of the Halibut Coalition.

Please safeguard our investments in the halibut fishery, protect the oppertunities for stability that all the halibut fishery participants [I.F.Q. holders, families, crew, processors, and consumers] deserve.

sincerely,

Kenneth R. McGee

*2390 Engineers Cutoff Rd. Juneau, AK 99801
(F.V. Tamarack)*

cc UFA, Halibut Coalition, Governor Knowles

January 24, 2000

10986 Second St. Bayview
Mt. Vernon, WA 98273

Honorable Rick Lauber, Chairman
NPFMC
605 West Fourth Avenue, Suite 306
Anchorage, AK 99501

RECEIVED
JAN 28 2000
N.P.F.M.C.

Dear Chairman Lauber:

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides an allocation based on 125% of the 1995 charter fleet's harvest. A set allocation for one commercial group – charter boats – while the other commercial group – long liners – absorbs all reductions in quota, is a sure formula for the demise of the commercial halibut long line fleet.

I have been involved in the halibut fisheries as a deckhand for the last ten years and commercial fishing in Alaska for twenty-five years. I have just become financially able to buy into the halibut and salmon fisheries but will have a very difficult time rationalizing my dream if the state is going to give everything that has been such a big part of my life away. The council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to me, to the fleet, could easily destroy family businesses, and my hope of continuing in the halibut fishery on my own.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

Sincerely,



Ryan Haun
Deckhand
FV/CINNABAR

Cc: Governor Tony Knowles



TYEE CHARTER SERVICE

P.O. Box 35621

JUNEAU, AK 99803

PHONE: (907) 586-9644

JLEYS@G455@AGL.COM

RECEIVED

JAN 28 2008

N.P.F.M.C

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

Dear Chairman Lanber,

I operate a sportfishing business in Juneau and am a member of the Juneau Charter Boat Operators Association and hold a seat on the Juneau- Douglas Alaska Department of Fish and Game Advisory Committee. I am writing in regards to the North Pacific Fisheries Management Councils impending action on the Guideline Harvest Level (GHL) cap of the guided sport industry and the management measures which may follow.

I have lived in Alaska for the past nine years and have been running my sportfishing business for the past four seasons and was the manager of someone else's for the year prior. Roughly 90% of my income is derived from guided sportfishing. I my household approximately 60% of our total income is a result of guided sportfishing. I love what I do and I fear that I could potentially lose my business due to this action.

I support Alternative 1: Status quo. The charter business is based on clients and access to a resource. With the implementation of a GHL, the access to the resource will be restricted for a certain user group. Many people do not own boats, have small boats or do not have the physical requirements to pilot their own boat. By capping a portion of the resource users who pay for the use of a vessel and someone to pilot the vessel, you are affecting resident and non-resident access to the resource. These users will also be unfairly punished in the form of lower bag limits and the areas in which they can fish. In Juneau I have to travel to find fish and I do not want to be told I can no longer make a trip to the coast to fish. I also feel that the proposed GHL levels are too low. Client expectation is what drives this industry we took a hit with the King Salmon non-resident limits. This has the potential to further damage our industry.

If action is taken I believe that the GHL should be a fixed range in numbers of fish based on the 1998 logbook harvest data and that it should be expressed in numbers of fish since the industry deals in numbers of fish caught in our logbooks. A three year rolling average of harvest should be used to determine when management measures are to be used. This would give more stability to the industry from year to year. Should it become necessary to lower the number of fish for conservation we will accept that as long as the levels rise with stock. The GHL percentage should be applied and the charter allowable catch should be taken BEFORE commercial by catch and wastage are removed from the Constant Exploitation Yield (CEY). The guided sportfish industry does not contribute to by-catch and wastage so we should not be penalized by it. If the commercial fleet can lower by-catch and wastage those additional fish should be theirs to harvest.

I would support a moratorium if the moratorium is a interim move to identify the number of boats that are active. I would support a cut off date of the 1998 logbook. This moratorium period can be used to develop a guided sport IFQ as a number of fish vs poundage of fish. Guided Sport IFQ needs to be transferable to/from commercial long line and CDQ quota shares. New entrants into guided sportfishing can then purchase quota shares to get into the business. This could turn out to be the most equitable and fair solution for all concerned.

Sincerely,

Jay Lloyd

RECEIVED

JAN 28 2000

1/26/00

Rick Lauber
North Pacific Council
605 west 4th
Anchorage AK 99574

N.P.F.M.C

I am opposed to any option other than basing the GHL on the 1997 council recommendation of the 125% of the 1995 harvest. Further I believe the council should strongly encourage the charter fleet to come up with a plan to self regulate its growth or the council should do it for them.

Halibut provides 50% of my families annual income. I have been long lining since 1976, way before there was any commercial charter fleet. The complexion of this fishery has changed dramatically over the years. It is plain wrong, that the commercial fleet is so highly regulated, taxed, and accountable, and the commercial charter fleet is completely unregulated, not taxed, and unaccountable.

My long lining supports 3 crew members. All of our product is deliver in Cordova Alaska.

James Kallander
PO Box 2272
Cordova, AK 99574
ph. 424-7603
jkall@ptialaska.net



Wards Cove Packing Company

PHONE (206) 323-3200

88 E. HAMLIN STREET
P.O. BOX C-8030
SEATTLE, WA 98108-0030

Day Fax (206) 323-9185

January 26, 2000

RECEIVED
JAN 28 2000
N.P.F.M.C.

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

Dear Chairman Lauber:

We support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation. Any other action by the Council will result in less halibut for consumers and impact seafood industry workers and companies that have invested in Alaska halibut.

We have 3 plants in Alaska communities, including Seward, Ketchikan and Alitak, processing halibut. In a typical year, we employ 450 workers. Our facilities provide sustainable jobs in our community and benefit many other businesses such as grocers, trucking firms, repair shops, airlines and restaurants. Commercial halibut dollars flow through almost every business in town. Reducing the commercial harvest will reduce the value of our investment in both capital assets and marketing. In addition it will result in less raw fish tax for both communities and the state; reduced tax for goods we purchase; and possibly reduce property taxes.

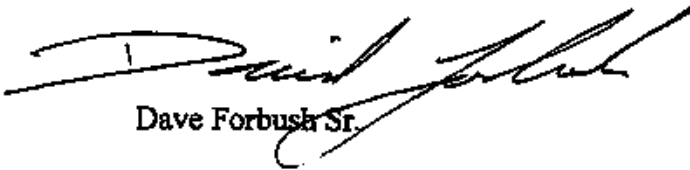
All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accepts the risks involved with fluctuations in harvest. Commercial fishermen and processors have been responsible stewards of the halibut fishery and have fished under rules adopted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

Page 2
North Pacific Fishery Management Council

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allows reasonable growth.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Forbush Sr.", written over a horizontal line.

Dave Forbush Sr.

cc: Governor Tony Knowles

DF/pt

Deep Sea Fishermen's Union of the Pacific

5215 Ballard Avenue N.W.
Seattle, Washington, 98107
Phone: (206) 783-2922



Fax: 783-5811



Established 1912

Richard B. Lanber, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Ste 306
Anchorage, AK 99501-2252

Dear Chairman Lanber:

Halibut Charter GHL

I am writing to oppose actions by ADF&G and the North Pacific Fishery Management Council that would provide a fixed poundage allocation for the halibut charter fleet. I have been a commercial fisherman for twenty-five years and have been exclusively longlining halibut and sablefish for thirteen years aboard the same vessel. I currently hold the position of President of the Deep Sea Fishermen's Union of the Pacific. We are a professional crewmen's Union of one hundred and forty active members working under an agreement with the Fishing Vessel Owners' Association, called the Set Line Agreement, that has been in effect since 1914. We are strictly halibut and sablefish longliners. Many of our crewmen worked aboard vessels during all of the qualifying years for original IFQ allocation. Some of our members were quite active in the IFQ debate and implementation process. Being crewmen of course, we received no allocation, even though we traditionally received sixty percent of the catch proceeds collectively.

Many crewmen have invested heavily in IFQ purchases in an attempt to gain foothold in this privatized industry. The old adage "all that crewmen have invested is their boots and oilskins" no longer holds true. As crewmen, we depend on the commercial halibut fishery for most of our annual income to support our families. We have invested heavily in IFQ's because of the stability promised by the government.

Reducing the commercial harvest will greatly impair the ability of second generation quota holders to repay their IFQ loans. As yearly stock abundance fluctuates, so does the allowable catch. This system is conservation oriented. Fixed poundage allocation for the charter fleet runs counter to this management philosophy. The charter allocation should be set according to 1995 harvest levels, as this was the year in which the IFQ program was implemented. 125% of the 1995 harvest is a generous compromise that allowed reasonable growth. For the sake of economic stability and resource conservation, our commercial allocation rises and falls with the strength of the fish stocks. The same should apply to the charter boat industry.

Your consideration of the letter is greatly appreciated.

Best regards,

Tim A. Henkel,
President

RECEIVED

JAN 28 2000

N.P.F.M.C

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK. 99501
January 25, 2000

RECEIVED

JAN 28 2000

N.P.F.M.C

Dear Chairman Lauber:

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides an allocation based on 125% or less of the 1995 charter fleet's harvest. I am definitely in favor of cutting charter bag limit to one fish per day per person.

The IFQ program as implemented by the council has resulted in an orderly fishery. A council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to the fleet.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

Halibut has been a part of my fishing income since 1967 and since the implementation of the IFQ program, a much larger part of my income. I went out and bought additional shares during the first year of IFQ's.

Please do not let the charter fleet increase their halibut catch on the backs of the longliners who have been good stewards of this resource for years.

Sincerely,

Kevin S. May

PO. Box 3160
Ketchikan, Alaska
99901

Copy Governor Tony Knowles
Copy Halibut Coalition

JAN 28. 2000

JOE D'ARIZZO

2219 SAWMILL CRK. HWY
SITKA, AK. 99835

DEAR CHAIRMAN LAUBER,
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL.

I AM A IFQ HALIBUT HOLDER IN SITKA. I SKIFF FISH AND
THIS YEAR APPROXIMATELY 16% OF MY EARNINGS CAME FROM HALIBUT
FISHING.

THE CHARTER FLEET SHOULD BE GRANTED A PERCENTAGE ALLOCATION
BASED ON ABUNDANCE AND HISTORIC LEVELS. CHARTER FISHING'S ALLOCATION
AT 125% OF THE 1995 HARVEST IS A GENEROUS COMPROMISE GRANTED BY
THE COUNCIL IN 1997,

ABUNDANCE BASED MANAGEMENT IS WISE AND FAIR. IT ALLOWS
FOR COLLECTIVE MANAGEMENT, SUSTAINABLE HARVEST AND ECONOMIC

I APPRECIATE THIS OPPORTUNITY TO COMMENT AND HOPE THE COUNCIL
CONTINUES IT'S SUPPORT OF ABUNDANCE BASED MANAGEMENT

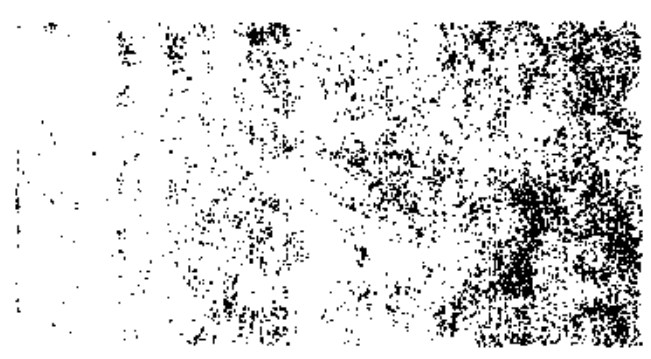
THANK YOU,

Joe D'Arizzo

RECEIVED

JAN 28 2000

N.P.F.M.C



January 18, 2000

Stephen Squires
3A IFQ Halibut Fisherman
4525 North Douglas Highway
Juneau, Alaska 99801
Phone: (907) 586-3862

RECEIVED

JAN 28 2000

Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, Alaska 99501-2252
Fax (907) 271-2817

N.P.F.M.C

Dear Chairman Lauber:

I am writing to urge you to stick with the decision you made in 1997 by granting the burgeoning charter fleet a percentage allocation that is based on abundance and historic levels. These are effective and responsible management measures to keep the charter fleet within their allocation while maintaining an equitable balance between user groups.

I worked as a teacher in rural Alaska for several years to earn enough money for a down payment to purchase IFQ shares. My family has made great sacrifice to get the capital for investing in the IFQ program, believing in the stability promised by the government. We depend on the commercial halibut fishery for a substantial part of our annual income. A reduction of the commercial harvest will impair our ability to repay the IFQ loan.

As a commercial fisherman, I'm prepared to accept the risks involved in fluctuations in harvest and believe in the responsible management philosophy that the International Halibut Commission has adhered to since 1923. Deviating from abundance based management for allocating charter harvest is poor public policy, gives charter operators no incentive for conservation, and undermines the state credibility.

The North Pacific Fisheries Management Council should keep the charter allocation at 125% of the 1995 harvest. This is a fair compromise by the Council in 1997 that allows reasonable growth.

Commercial fishing continues to provide many jobs in our communities. Commercial halibut dollars circulate through almost every business and town, providing sustainable jobs, benefiting all Alaskans!

Sincerely,

Stephen Squires
Stephen Squires

25 Jan 00

Richard Lauber
North Pacific Fishery Management Council

RECEIVED
JAN 28 2000

N.P.F.M.C

Dear Mr. Lauber

This letter concerns the proposal before the NPFMC to put a restriction of $\frac{1}{3}$ halibut per person on charter vessels.

I have lived here for 25 years, raised a family and fished this area for all these years. I have retired and now have a small, independent charter business.

The last few years have seen an increase in the commercial harvest and a stable ~~catch~~ catch by sport fishermen, and now the proposal is to decrease our catch from 2 to 1?

I, and every other non-commercial fisherman I know are content with a limit of 2 and we ask for no more than that.

Please read this typical scenario:

We take out a few folks halibut fishing.

With any luck, everyone catches 1 halibut.

We spend the rest of the day hunting for the elusive "barn door."

Most everyone is satisfied with their halibut trip even if they did not catch a big one, because they have at least one halibut to show for the trip and were able to spend the whole day fishing!

A limit of $\frac{1}{3}$ puts a customer under pressure to throw back maybe the only halibut he will catch all day and come home "skunked" or keep the halibut and have a whole days fishing trip over in a couple of hours.

Statistics show that the average halibut catch is just barely over 1 halibut per person a day, and for the above reason.

A limit of 2 is just right.
We don't overfish the stock and we
give a lot of people fond memories
of a successful fishing trip to Alaska.

I certainly hope you will
consider keeping the limit at 2.

Thanks for your consideration

Whitey Bloom

WHITEY BLOOM

PO Box 211013

Anchorage, AK 99521

(907) 789-0990

To Whom It May Concern:

I am an Alaskan resident who fishes and takes family and friends from Outside fishing. I am strongly against limiting sport fishermen to only one halibut. I believe \$160⁰⁰ to catch and keep only one fish is too expensive for the average fisherman and everyone in the state suffers from lost revenue from both locals and tourists. Thanks for your time.

Paul Fritz

PO Box 195

Palmer, Alaska 99645

e-mail: gulogulo@alaska.net

phone/fax: 746-1299

RECEIVED

JAN 28 2000

N.P.F.M.C

January 23, 2000

**North Pacific Fishery Management Council
605 West Fourth Avenue, # 306
Anchorage, Alaska 99501**

Subject: The North Pacific Fishery Management Council's proposals to limit charter boats participation and to reduce their clients bag limits to one halibut per day.

No reasons have been presented to indicate that these proposed actions are fundamentally necessary for the protection of the sustained yield conservation of these common property public trust fishery resources. In fact, we find that the councils admitted purpose is to limit common personal consumptive users allocation, and to provide that for a prescribed exclusionary class of commercial harvester. (ie IFQ)

As common consumptive users of the public trust fish, wildlife and waters; we submit the following cited legal opinions as information to the North Pacific Fishery Management Council, in support of our position:

- I. **Alaska vs. Ostrosky**
Cited as 667 p2d 1184 (Alaska 1983)

Justice Robinowitz dissenting opinion, which has since been effectively adopted, by the Alaska Supreme Court, in several related cases:

- (a) "Free transferability (ie limited entry permits now likewise IFQ) impairs rights guaranteed by three separate clauses of the Alaska Constitution."

Article VIII

Section 3 "Wherever occurring in their natural state fish, wildlife and waters are reserved to the people for common use."

Section 15 "No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the state."

Article I

Section 1 "All persons are equal and entitled to equal rights, opportunities and protection under the law."

"The common use clause necessarily contemplates that resources remain in the public domain and will not be ceded to private ownership."

"Since the right of common use is guaranteed expressly by the constitution it must be viewed as a highly important interest running to each person within the state." "In my view, Article VIII Section 3 still mandates that limited entry be achieved through the least possible "privatization" (ie IFQ) of the common resource."

The no exclusive right or special privilege of fishing clause was adopted, into the Alaska Constitution, from a federal statute (ie The White Act) that congress passed before statehood; and reflects the continued recognition of the public trust doctrine responsibility in the management of the common use of our replenishable resources for and by the people as a whole.

ii. **Owisichek vs. Alaska**
Cited as 763 p2d 488 (Alaska 1988)

This case also cites the dissenting opinion of Justice Robinowitz, in the Ostrosky case. It explicitly references the "Public Trust", "Public Trust Doctrine" and the common use clause⁸ over 40 times.

Page 493 "The expression for common use implies that these resources are not to be subject to exclusive grants or special privileges (ie IFQ) as was so frequently the case in royal tradition."

Page 494 "The development of free institutions has led to the recognition of the fact that the power or control lodged in the state, resulting from this common ownership, is to be exercised like all other powers of government as a trust for the benefit of the people, and not as the prerogative for the advantage of the government, as distinct from the people, or for the benefit of private individuals as distinguished for the public good."

Page 497 "Admittedly there is a difference between **(footnote 15)** commercial fishermen and professional guides." "A commercial fisherman takes his catch himself before selling it to others for consumption, while a hunting guide does not actually take the game, a privilege reserved for the client." "We view this as an insignificant distinction that does not remove the professional hunting guide from protection under the commons use clause." "The work of a guide is so closely tied to hunting and taking wildlife that there is no meaningful basis for

distinguishing between the right of a guide and the rights of a hunter under the commons use clause."

Contrary to the public propaganda, that some expound, charter operators are not commercial fishermen. They in fact furnish commercial transportation and expertise needed to their clients, who are the personal consumptive USERS of the common property public trust fishery resources.

Another false propaganda concept is that those non-resident clients are a bunch of free loaders. The state of Alaska recently lost a federal court case because we were charging non-resident commercial fisherman three times as much as residents. The court found that since residents pay no taxes in support of fishery management costs, the state could not charge non-residents any more.

But in the case of sport fishing, the state of Alaska is now charging non-residents up to eight times as much as residents. No other state charges such differences.

The courts have consistently found that the public trust fishery resources belong to all citizens as a whole. Discrimination based on either interstate or intrastate residency has been judged to violate the United States Constitution's privilege and immunities doctrine, as well as the due process and equal protection clauses of the 14th amendment.

III. McDowell vs. State
Cite as 785 p2d 1 (Alaska 1989)

This case cites both the Ostrosky and Owisichek cases in reference to the open access clauses of the constitution and the exclusionary fisheries such as limited entry.

Pages 9
& 10

"Since the common use clause of section 3 and the no exclusive right of fishery clause of section 15 remain in the constitution, the premise of the argument is that whatever system of limited entry is imposed must one.... which entails the least possible impingement on the common use reservation and on the no exclusive right of fishery clause." "The argument concludes that free transferability does not entail that least possible impingement on the anti-exclusionary values which these provisions reflect." "The premise of this argument is logical."

"The optimum number provision of limited entry act is the mechanism by which limited entry is meant to be restricted to its constitutional purpose." "Without this mechanism limited entry has the potential to be a system which has the effect of creating an exclusive fishery to ensure the wealth of permit holder and permit values, while exceeding the constitutional purposes of limited entry." "Because of this risk of unconstitutionality exists, the commercial fisheries entry commission should not delay in embarking on the optimum number process."

When comparing the system IFQ's with that of limited entry, we find that it has the same potential of creating an exclusionary class to ensure the wealth of IFQ holders and IFQ permit values; while impinging on constitutional rights of the common personal consumptive USERS. Because of this risk of unconstitutionality and violation of the Public Trust, the council's responsibility is to not delay in maintaining an optimum number process for IFQ's within this commercial halibut fishery.

III. **Payton vs. Alaska**
Cite as 938 p2d 1036 (Alaska 1997)

This case specifically addresses the important constitutional differences between USE and USERS.

Page 1042 "Accordingly we consistently have interpreted customary and traditional to refer to "USES" rather than "USERS"

The Alaska Constitution addresses these differences in explicit sections of Article VIII.

Section 4: Fish, forests, wildlife, grasslands and all
(sustained yield) other replenishable resources belonging to the state, shall be utilized, developed and maintained on the sustained yield principle, subject to preferences among beneficial USES.

The open access clauses of section 3 common use, section 15 no exclusive right or special privilege of fishery and section 17 uniform application all mandate that there be no preferences among USERS.

v. **Totemoff vs. State**
Cite as 905 p2d 954 (Alaska 1995)

We take the position that the fish, wildlife and waters are common property public trust resources. The legislators as trustees management, are responsible to the people as a whole, who are the beneficiaries (USERS).

The Alaska's constitution's Article VIII "Natural Resources" is the finest of any in the nation and is a valid foundation guide line for the management of these replenishable common property fish, wildlife and water resource.

The Alaska Supreme Court has a history of valid judicial findings that are based on recognition of the Public Trust Doctrine and Equal Protection under the law doctrines of both the United States and Alaska Constitutions. Within this history, we are prepared to defend the personal consumptive common use right of the people as a whole.

In the Totemoff case the Alaska Supreme Court has established their first line of authority in these matters.

Page 955 "Alaska Supreme Court is not bound by decisions of federal courts other than the United States Supreme Court on questions of federal law."

With this edict in mind, the people as a whole will welcome a final decision on their equal constitutional right as common consumptive USERS of these halibut fishery resources.

Submitted on behalf of concerned public interests.

Dale Bondurant
Dale Bondurant
31864 Moonshine Drive
Soldotna, Alaska 99669

Sam E. McDowell
Sam E. McDowell
336 E. 23rd Avenue
Anchorage, Alaska 99503

cc: Concerned Alaskans
Concerned Americans

PREPARED BY	
DATE	

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CHAIRMAN LAUBER,

1/20/2000

I SUPPORT GRANTING THE CHARTER FLEET A PERCENTAGE ALLOCATION THAT IS BASED ON ABUNDANCE AND HISTORIC LEVELS.

I HAVE MADE MY LIVING AS A COMMERCIAL FISHERMAN FOR 20 YEARS AND I DEPEND ON THE COMMERCIAL HALIBUT FISHERY FOR MOST OF MY INCOME. I HAVE BORROWED HUNDREDS OF THOUSANDS OF DOLLARS IN THE IFQ FISHERY BECAUSE OF THE STABILITY PROMISED BY THE GOVERNMENT.

THE LOCAL COMMUNITY BENEFITS FROM MY COMMERCIAL HALIBUT BUSINESS. I HIRE LOCAL PEOPLE AND ALL BOAT SUPPLIES AND REPAIRS ARE DONE IN THE LOCAL COASTAL COMMUNITIES.

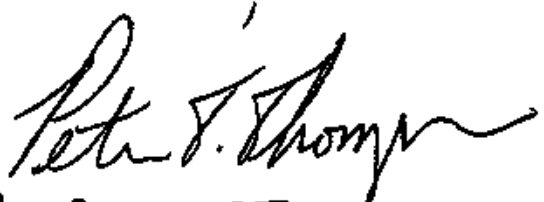
DELINKING THE HALIBUT CHARTER HARVEST FROM ABUNDANCE BASED MANAGEMENT IS POOR PUBLIC POLICY, GIVES THE CHARTER OPERATORS NO INCENTIVE FOR CONSERVATION, AND UNDERMINES THE STATE'S CREDIBILITY.

THE N.P.F.M.C. SHOULD KEEP THE CHARTER ALLOCATION AT 12.5% OF THE 1995 HARVEST.

YOUR CONSIDERATION OF THIS LETTER IS APPRECIATED.

RECEIVED
JAN 28 2000
N.P.F.M.C

SINCERELY



PO. BOX 3037
KODIAK, AK. 99615 (907) 487-2527

LETTER IN SUPPORT OF GHF FOR SPORT-CHARTER FLEET

RECEIVED

January 26, 2000

JAN 28 2000

TO: NPFMC Members
605 W. 4th St, Suite 306
Anchorage, AK 99501-2252

N.P.F.M.C

FROM: John Webb
92615 Astor Rd
Astoria, Or 97103

Dear Sirs,

I have fished for halibut as a commercial fisherman from 1987 to the present, in areas 3A, 3B, and 4A. It has been a hard, but satisfying occupation. Initially, I was allocated 8000 lbs. of fish by the IFQ program. I then borrowed money, and bought enough shares to make a viable business out of it. The thought of paying thousands of dollars to buy myself a job wasn't that great of an option, but was better than the alternative of quitting altogether. I did so hoping that I would pay my dues, add a little to stability to my very unstable fishing income, and maybe have something left of my investment when I retire. However, life in Mayberry may not be all peaches, and cream.

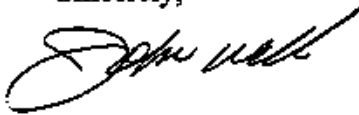
Unlike the commercial longline fleet, the sport-charter fishermen have been allowed to catch an ever-expanding amount of fish. I am in favor of putting a limit on the amount of fish they can catch, by way of the 1997 GHF proposal in pounds (2C - 12.76%; 3A- 15.61%)

As a commercial fisherman for halibut, salmon, and herring off the coast of Alaska I have always accepted that to catch a fixed percentage of the total biomass was a good idea. Harvest levels would vary with abundance. The idea, that the sport-charter fleet would expect to get a fixed amount of fish - regardless of what the stocks are doing seems, ludicrous, especially since commercial fishermen like me would be subsidizing the sport-charter quota to a great extent,

during times of less fish.

The longline fleet has had a painful, and difficult time allocating fish amongst its' different members, but we have done so without taking fish away from other user groups. I would hope that the sport-charter fleet would use that same standard in the interest of fairness to the rest of us.

Sincerely,

A handwritten signature in black ink, appearing to read "John Webb", written in a cursive style.

John Webb

Queen Anne Fisheries, Inc.
1939 Eighth Avenue West
Seattle, Washington 98119
206-284-9158

*Mark S. Lundsten, Captain
F/V Masonic*

January 27, 2000

Rick Lauber, Chairman
North Pacific Fisheries Management Council
605 West Fourth Avenue, Suite 306
Anchorage, Alaska 99501

RECEIVED
JAN 28 2000
N.P.F.M.C

Dear Rick,

Please establish a guideline harvest limit for the halibut charter industry in terms of a percentage of the annual halibut quota. Not to do so would be inconsistent with the management history of the North Pacific Council and with the principles of conservation of the International Pacific Halibut Commission (IPHC).

The Council designed and passed an IFQ program in which fishermen invest in the fishery. Many if not most of our fleet have bought IFQs and now have large mortgages. These are investments not just in harvest privileges but also in the quality of fisheries management. We are counting on a sound and reliable system. We are counting on you to follow through on what you have started. Is the Council going to ignore our investments after designing a system that promotes them? To give the charter-boat industry a fixed poundage of that fishery would be a breach of this faith in management inherent in our system.

We have a strong halibut resource because we have always saved enough fish in the ocean for the future. We do that by directing the IPHC to set annual quotas. Everyone has to live within those variable, biological limits. The charter industry needs to live within them like everyone else. Please establish a guideline harvest limit for that industry as a percentage of the annual quota. Thanks for your consideration.

Sincerely,

Mark S. Lundsten
Mark S. Lundsten

Russell & Jeannie Pinkelman
P.O. Box 336
Delta Jct., Alaska 99737
907-895-5250

January 26, 2000

North Pacific Fisheries Mgmt Council
605 W. 4th Ave Suite 306
Anchorage, Alaska 99501-2252

Attn: Richard Lauber

RECEIVED

JAN 31 2000

N.P.F.M.C.

Dear Mr. Lauber:

By now we are sure that you have received many letters regarding the limitations you are proposing on the halibut fisheries.

It is the commercial fleets that are damaging the halibut number not the sport fisheries. We only get 3% of the fish they get **ALL** the rest, so please don't even try and take our measly quota of two halibut a day away, pick on the other guys.

By doing this you are absolutely going to kill the charter businesses, because we cannot afford to go out for a boat ride at \$175.00 and get one fish. We depend on our fish runs to feed our families.

For What It Is Worth,

Russ & Jeannie Pinkelman

Russ Jeannie Pinkelman

cc: National Oceanic & Atmospheric Asso.
Mr. Terry Garcia, Washington D.C.
Fax 1-202-482-6318

RECEIVED

JAN 31 2000

January 25, 2000

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

N.P.F.M.C

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet with their allocation.

My family and I depend on the commercial halibut fishery for a large percentage of our annual income. We have already been hurt financially by the implementation of IFQ's. Our income was cut by \$30,000 Dollars when we didn't receive any black cod IFQ's after fishing for 4 years, and being limited on our halibut. We have had to pay for an expensive boat with that lack of income!

The majority of jobs in our community rely on the halibut coming into our ports thru fisherman and processors. We have already seen a decline in jobs in our community and a decline in the enrollment of our schools as a direct result of IFQ'S. We have many businesses that rely on that fishery all the way from the processors to the shipping lines, and grocers. Reducing the commercial harvest will further reduce the value of IFQ's and my boat, and it will impair the ability of people to repay both boat and IFQ loans.

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

Sincerely,

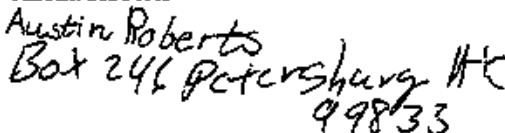
Mark Roberts



Lori Roberts



Austin Roberts



Austin Roberts
Box 246 Petersburg AK
99833

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

January 24, 2000

Dear North Pacific Fishery Management Council Members,

I have been fishing commercially for halibut as a crew member since 1981. Halibut is a big percentage of my familys income.

I can understand the charter industry wanting an allocation of the quota, but to even think of giving them a fixed poundage based on one of the highest quota or biomass ever seen is ludicrous. It is totally against the conservative approach of setting G.H.L.'s according to stock abundance. The commercial fleet would be burdened with conservation needs and the charter fleet would have no incentive for conservation, while the charter percentage would increase as the quotas go down in the future.

It would not be such a drastic hit for IFQ holders and their crew members if the council sticks with the 1997 agreement of 125% of the 1995 sport harvest. And on the subject of qualifying years, the original IFQ qualifying period was 5 years prior to the implementation of the system, and during those 5 years the number of commercial boats increased, only to be cut out later, after the 1995 implementation. The same should happen to the charter fleet, to include boats entering the fishery since 1997, and to allocate them part of the commercial poundage would put undo burden on those such as myself who have spent so long building a fivelihood in commercial halibut fishing.

Thank you for the opportunity to state my views.

Sincerely,

Dennis Steinbach
Kodiak, Alaska

Dennis J Steinbach
127-2000

RECEIVED

JAN 31 2000

N.P.F.M.C

*G. Kirk
Box 2796
Kodiak AK
99815*

Jan 26, 2000

TO: North Pacific Fisheries Management Council
605 W. 4th Ave Ste. 306
Anchorage AK 99501-2252

FROM: Julie Gillette
P.O. Box 672326
Chugiak AK 99567

RECEIVED
JAN 31 2000
N.P.F.M.C.

Councilmen,

If you care about Alaskans and their ability to make a living, you will not tamper with the rights of private fishermen to catch two halibut. My husband and I are both Alaska residents and we use charter services once a year to fill our freezer. For us to do this, we drive to Homer from Wasilla, stay the night in a hotel, eat at local restaurants, and buy fuel at local stations. If we are fortunate enough to catch fish on our \$150 per person boat trip, we pay for processing. We are just two of thousands of people, Alaska people, who spur our own state economy while providing for our family.

This year we have friends and family visiting us from the lower 48 to join us in halibut fishing. These people will be buying plane tickets, supporting local restaurants and gift shops, buying fishing licenses, and supporting our charter services.

If our limits are reduced from two to one, my husband and I will continue to support our charter services even though our cost per pound will double. Why? Because we believe in people trying to make an honest living by providing customer service to those of us who do not have our own boat. We will change one thing, if the limit is reduced we will not buy halibut from any restaurants or stores or anywhere else that purchases fish from you. If it means never eating halibut again, it's a choice I would gladly make along with my friends and family.

When we hire a charter, we end up paying more per pound than if we bought halibut from a commercial source, but we have the thrill of catching it, the knowledge of how it was processed, and the knowledge of how long it's been in the freezer. For this same reason, we hunt. My husband and I, like many others, take comfort in knowing how our food was processed and that there are no preservatives or drugs in it.

I know your employees need to earn a living, too, but don't lose sight of them in your desire for control and greed. There are enough fish for all of us right now. And please, don't give us this precious Alaskan resource to International fisheries in the name of capitalism. They will be sure to scour our waters and deplete our halibut resource to extinction.

If BP gets monopolistic control of our oil, and you take monopolistic control of our fish, the economy will suffer huge losses and no one will have the income to pay the income tax. I hope the views of the locals mean something to you.

Thank you for the opportunity to voice my opinion.

Sincerely,

Julie A Dille

HALIBUT SPORT FISHING

RECEIVED

JAN 31 2000

Dear Management council,

N.P.F.M.C

I am a subsistence hunter and I enjoy being able to harvest food for my table from the great wide wilderness that God has provided for me. When you start limiting me in preference of commercial and tourist I want to stout! I will not vote for you or any other person who do not consider the majority of the residents of this state. There is no shortage of our resources. Remember we live here all winter. The tourist and the majority of the commercial fishermen take their money to spend it some where else in the winter.

Sincerely,

Paula J Carpenter
Paula J Carpenter
January 26 2000



Kietoqua's Unique Gifts & Supplies
Manager: Paula Carpenter
P.O. Box 793 Slana, AK 99586

January 16, 2000

North Pacific Fisheries Mgmt. Council
Attn: Richard Cauber, Chairman
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RECEIVED

JAN 31 2000

N.P.F.M.C

Mr. Cauber,

Someone's reasoning is wrong - let's see: I'm going to pay someone approx. \$300.00 plus expenses for a Charter Halibut Fishing trip.

When I get out on that boat and reel me in a Halibut, I'm gonna turn around come home and put it in my freezer - when I can pay someone here to do that for me. One doesn't make it worthwhile for all that money and time, but two? If I get small ones this year, well, maybe next year'll be better.

At least with a larger limit I have a "sporting chance"... Isn't that what it's all about? Obviously, there needs to be a more objective input on the subject. Why should Sports and Recreational fisherman be governed by rules streamlined for Commercial fisherman? Apples and Oranges may both be fruit, but they don't grow on the same tree.

cc. terry garcia, Natl. Oceanic



NO RETURN ADDRESS
INCLUDED

January 25, 2000

Honorable Rick Lauber, Chairman

North Pacific Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

RECEIVED
JAN 31 2000
N.P.F.M.C

I am writing to oppose the actions of the sportfish division of ADF&G which if adopted by the North Pacific Management Council would provide a fixed allocation to primarily non-Alaskan halibut sport fishers. I support granting the charter fleet a fixed percentage allocation that is abundance related.

The proposal for a fixed guided sport harvest allocation of halibut is a fish grab pure and simple. The state's proposal for a fixed, or stair stepped allocation is diametrically opposed to sound abundance based management which has been the corner stone of Alaska's successful fishery management programs.

I have made commercial halibut harvesting a significant part of my fishing business plan. Along, with an Alaskan partner I have invested in 2C halibut quota in addition to my initial allocation. We based this purchase on the promise of a stable environment, with a known set of competitors. If the Sport Fish Division's eleventh hour proposal is adopted my partner and I stand to take as much as a 70% cut in our harvest levels in years of low abundance to allow the guided sport industry to maintain a stable harvest for the most part.

The State of Alaska has a well grounded policy of abundance based fishery management. The entire west coast is well aware of that policy. If the state advocates for a fixed harvest level for one user group that is not subsistence based it discredits the philosophy of abundance management in the eyes of all. This Sport Fish Division proposal will benefit the guided sport sector and will make the commercial harvester bear any conservation measures disproportionately.

The charter allocation should be set at the negotiated level set by the council in 1997. This level was 125% of the charter harvest for 1995 the highest catch then on record. This is a very generous level granted to a new industry that primarily (97%) caters to non-Alaskan sportsmen with no investment in the resource.

Respectfully yours,



Paul G. Southland

cc: Governor Tony Knowles

Paul G. Southland
P.O. Box 3200
Blaine, WA 98231-3200



RECEIVED
JAN 31 2000
N.P.F.M.C.

January 27, 2000

Honorable Rich Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

Chairman Lauber:

I support granting a percentage-based allocation to the charter fleet at 125% of the 1995 harvest.

I am a lifelong halibut fisherman (28 years). I derive all of my annual income from halibut and sablefish fishing in Alaska. I have invested in the IFQ system. I directly support 6 other families with my boat. All of my crew have invested in IFQ's as well. Without exception, I have supported the International Pacific Halibut Commission's recommendations for responsible biological management of the fishery.

I am offended by ADF&G's proposal, that the charter fleet have an annual quota that does not reflect the current status of the stock.

Sincerely,

Dean J Adams

Dean J. Adams, Pres.
F/V Quest, Inc.

DONALD BROOKINS
PO BOX 1324
KODIAK, AK 99504

RECEIVED

JAN 31 2000

N.P.F.M.C

January 24, 2000

Dear North Pacific Fishery Management Council Members,

I have been fishing halibut as a crew member since 1996. Halibut is a major percentage of my income.

I can understand the charter industry wanting an allocation of the quota, but to even think of giving them a fixed poundage based on the highest quota or biomass ever seen is ludicrous. It is totally against the conservative approach of setting G. H. L.'s according to stock abundance. The commercial fleet would be burdened with conservation needs and the charter fleet would have no incentive for conservation, while the charter percentage would increase as the quotas go down in the future.

It would not be such a drastic hit for the I. F. Q. holders and their crew members if the council sticks with the 1997 agreement of 125% of the 1995 sport harvest. And on the subject of qualifying years, the original I. F. Q. qualifying period was 5 years prior to the implementation of the system, and during those 5 years the number of commercial boats increased, only to be cut out later, after the 1995 implementation. The same should happen to the charter fleet, to include boats entering the fishery since 1997, and to allocate them part of the commercial poundage would put undo burden on those such as myself who depend on halibut to make a living. Thank you for the opportunity to state my views.

Sincerely,

Donald Brookins
Kodiak, AK.

January 27, 2000

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

RECEIVED

JAN 31 2000

N.P.F.M.C

Re: Allocation of halibut to the charter fleet

Dear Mr. Lauber:

I am writing the NPFMC to voice my concerns about the allocation of Alaskan halibut as a resident of Alaska and a commercial harvester with IFQ holdings in Southeast Alaska.

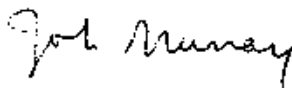
I would like to see this issue settled so commercial fishermen know where we stand. It is hard to make any business decisions in this atmosphere. It seems risky buying or selling IFQ's at present, and the uncertainty is very distressing to many of us small holders that depend on the fishery to maintain a livable income.

I believe the proposal giving charters 125% of their historic catch levels and having their part of the quota go up and down with guideline harvest levels is a fair and equitable way to go.

I see granting charters a fixed quota as wrong and unfair. No one guarantees you a living fishing, you must work at it and make the income that it affords.

Thank you for considering my livelihood in this decision.

Sincerely,



John Murray
224 Observator Street
Sitka, AK 99835
907-747-6212

cc: Governor Tony Knowles

RECEIVED

JAN 31 2000

N.P.F.M.C

Charles E. Wilber
705 Etolin
Sitka, Alaska
99835

1-907-747-5819 cwilber@gci.net
F/V Alexa K

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

I support granting the Charter fleet a **percentage** of Halibut. The 1997 decision of the North Pacific Fishery Management Council to permanently allocate 125% of the 1995 Charter Halibut harvest is fair and equitable. The continuation of the status quo ignores the problem of the steadily increasing Halibut catch by the Charter Fleet and results in a rapidly expanding reallocation of Halibut away from the traditional Halibut fleet. I am strongly opposed to the ADFG Sportfish Division proposal to allocate a **fixed poundage** of Halibut to the Charter fleet. The Charter fleet should be regulated under a percentage allocation based on abundance and historic catch rates.

This year the IPHC mandated harvest reduction of 20% and 25% in areas 2C and 3A would be especially detrimental to my fishing business and my family's welfare; if a fixed Charter allocation were in place. When total abundance goes down, a fixed allocation to the Charter fleet means an even steeper reduction in the remaining Halibut quota for the Commercial industry. Halibut produces about 40%-50% of our family income. I have fished out of Sitka for 21 Salmon seasons and 15 Halibut seasons. My wife Mollie (she is one of the Governors appointees to the Alaska Public Broadcasting Commission) and I own a home in Sitka and have two kids in the school system. I am a 14 year member of Seafood Producers Cooperative and am a board member at present. The commercial fleet has willingly accepted controls and regulations to keep the Halibut resource healthy. I feel that it is a bad precedent and bad management to regulate the Charter fleet under a fixed allocation while the Commercial fishery shoulders the capricious swings of abundance based management. Having two very different forms of management for the same Halibut resource undermines the credibility of the managing agency. Our family derives a major portion of its income from the Halibut resource. We would like to see all harvesters of Halibut regulated under the same rules.

Even though I consider myself a Commercial fisherman, I have held a Charter license for the past 13 years. I can certainly understand why a commercial Charter operator would want the consistency and stability that a fixed poundage allocation would bring. Anyone who has been in the fishing industry very long (and charter boats are a

component of the fishing industry) soon realizes that the very nature of fishing is inconsistency. A fisherman can have a poor season due to lack of abundance, breakdowns, weather, or bad timing. I would love a fixed poundage of Halibut to work from. My monthly bills would be much easier to plan for if I knew exactly how much fish I could catch. Unfortunately, the resource would be poorly served during downward population swings. It is no easier for an Commercial Halibut fisherman to deal with seasonal fluctuations than it is for a Charter operator to deal with the same ups and downs. If one segment (Charter) of a fishery is able to convince the government to guarantee a fixed poundage the remaining segments (Commercial) shoulder a disproportional burden when the inevitable population downturn comes.

Ever since the ADFG Sport Fish Division made this proposal the Halibut IFQ market has been depressed. Even though the dock price for Halibut is the same as when I bought IFQ two years ago, the quota price is now down a third. The possibilities of no commercial Halibut fishery during a year of low Total Allowable Catch is causing real financial hardship for those who have bought Halibut shares in good faith.

I hope that the ADFG Sport Fish Division quits advocating during gear group squabbles and returns to its primary mission - managing fisheries for the benefit of the resource. When the Sport Division enters the political arena, advocating one group over another, it loses its credibility to responsibly manage the resource. The charter fleet should be given a percentage of the harvest. 125% of their 1995 harvest is generous to the Charter fleet and responsible to the fishery resource and all those who depend on it for a living.

Thanks for your careful consideration on this issue. Many Halibut fisherman in Sitka are quite worried about the negative possibilities this fixed poundage proposal could cause for our fishery.

Yours truly,



Charles E. Wilber
f/v Alexa K

cc Governor Tony Knowles



January 25, 2000

Council Member
North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage AK 99501-2252

RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Council Member:

This letter is in regards to the Final Action on the halibut charterboat issue, to be taken up at your February 2000 meeting. I own and operate a charter business in Sitka. I have followed this issue since it first appeared on your agenda in 1993. I am for the status quo and writing mostly to record for posterity, the events that lead up to this travesty.

1) Your flagrant intent to regulate charterboat operators as commercial fishermen is simply wrong. In fact, it is contrary to the definitions used by the Internal Revenue Service, the U.S Coast Guard, the Magnuson/Steven Fishery Conservation Act and the precedents set in all of the other regional councils. The rest of the regional councils in the nation have up to 50 percent of their voting members, representing the recreational fishing sector. The NPFMC has zero.

Even the Alaska Board of Fisheries has recreational angler representation. I may not agree with everything the Board of Fisheries does, but at least I know I am being represented. I have no such feeling with the way the NPFMC is dealing with the charterboat issue.

2) The alternatives before the Council were seeded back in 1995, drafted and introduced by a member of the Advisory Panel, who also happens to be a member of the Alaska Longline Fishermen's Association.

3) In 1996, the taxpayers paid ISER many thousands of dollars to conduct a study of charterboat businesses in Alaska. The report was accepted and released by the Council for public review in April 1997, even though the preparers said the report had "huge data gaps" and the majority of the members of the Scientific and Statistical Committee (SSC) agreed the report was "fundamentally flawed." The data from this document was then used by Council staff in their Update on Analytical Design of the Halibut GH/L/Moratorium Analysis, October 20, 1999 (page 7, paragraph 2).

4) As the regulatory body of the Alaska halibut resource, the Council approved huge increases in the commercial catch quotas in 1998 and 1999, due to high recruitment in the biomass and a new method of calculating TAC. Zero consideration was given to sport anglers. The Council expropriated the increases to commercial fishermen with impunity.

5) In December 1999, the Council voted to release for public review, an Analysis of the Charterboat Halibut GHL/Moratorium, even though the majority of the members of the SSC *again* referred to the Analysis as incomplete and flawed.

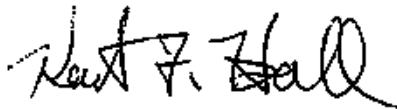
6) The increase in halibut charterboat activity has been described as exploding and skyrocketing by the commercial fishing industry. The attached graphs, compiled from IPHC and ADF&G data, tell a different story. True, the number of permits and/or registrations has increased dramatically, thanks to the theory of commercial limited entry permits. But, only 210 vessels, *statewide*, turned in logbooks recording more than 100 charters for 1999!

Furthermore, though the number of vessels has increased over the past 10 years, the sport catch has actually leveled off and decreased in the past five years.

7) Some of the proposed alternatives before the Council, will essentially allocate less than 10 percent of this public resource to the public. This is ludicrous. The public should have the choice of whether they want to buy halibut from the grocery store, or have the opportunity to catch their own halibut by rod and reel.

In summary, until there is a voting representative from the recreational sector, and reliable data as a basis for regulations, I am in favor of status quo. Only then, will I feel as though my clients and I have a chance of being treated fairly.

Sincerely,



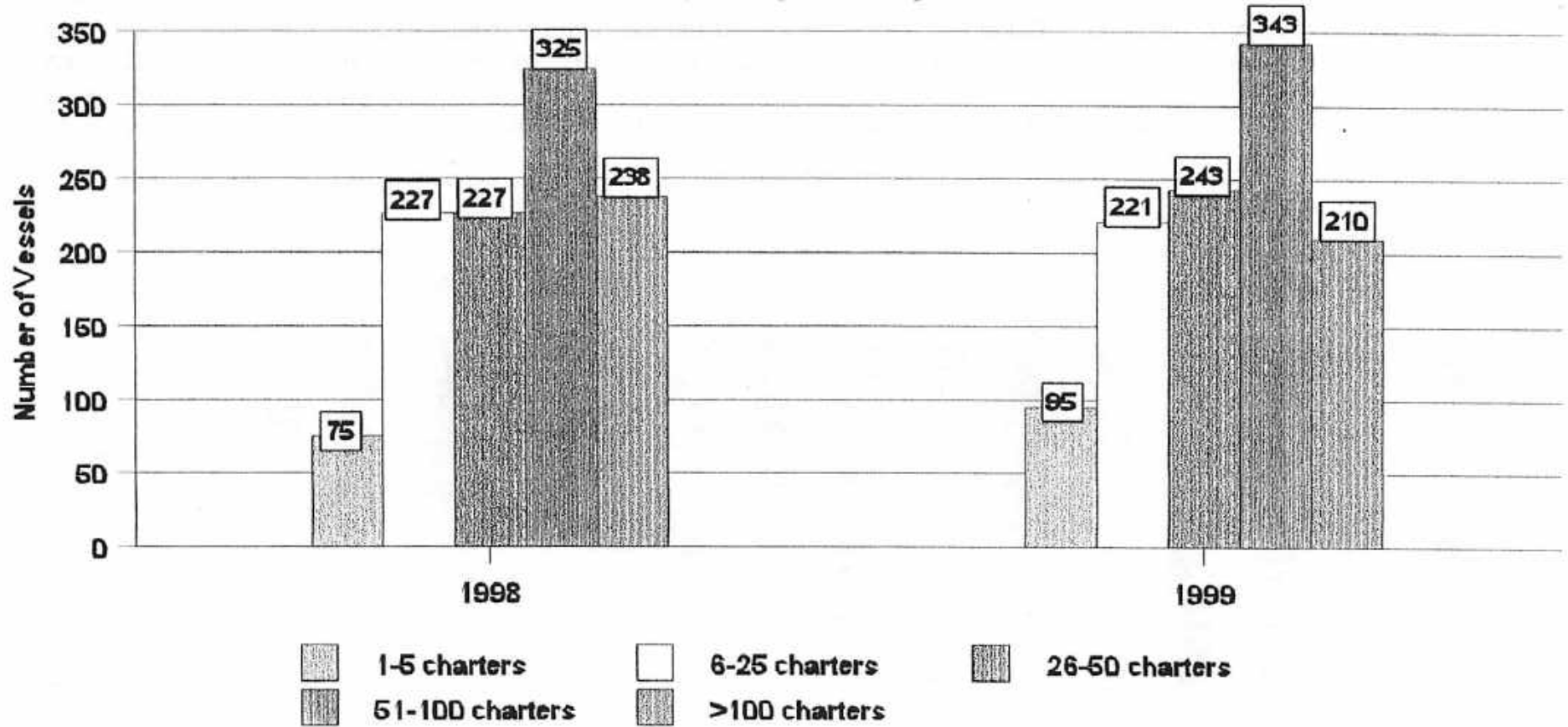
Kent F Hall

P.S. A better way to resolve this issue would be to use LAMPS or an area wide task force, where all user groups are truly represented.

Attachments

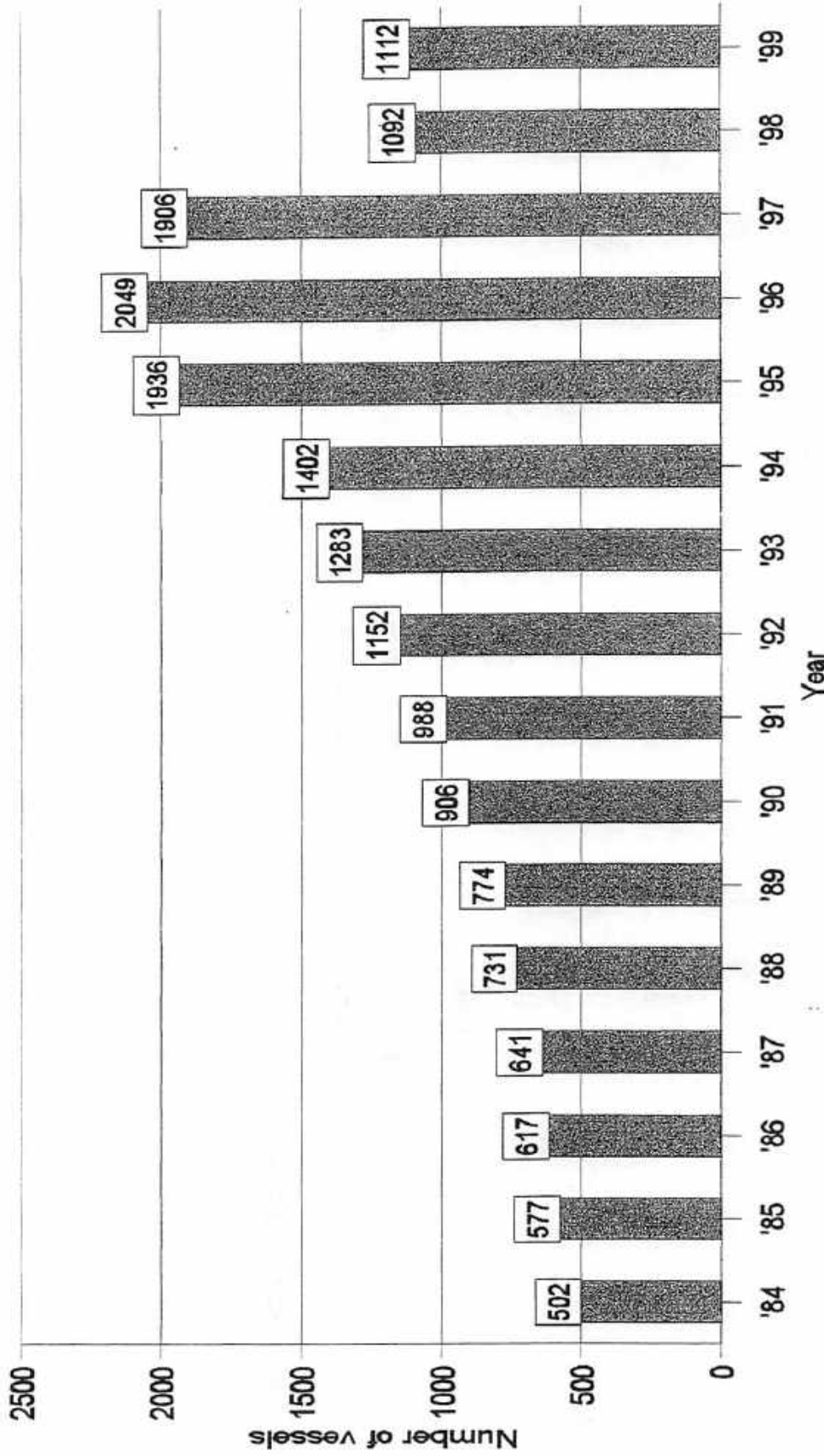
cc Secretary of Commerce William Daley
Director of Fisheries, NOAA, Penny Dalton

Charter Vessels Grouped by Activity Levels



Data from ADFG logbook program

Halibut Charter Vessel Registrations in Alaska

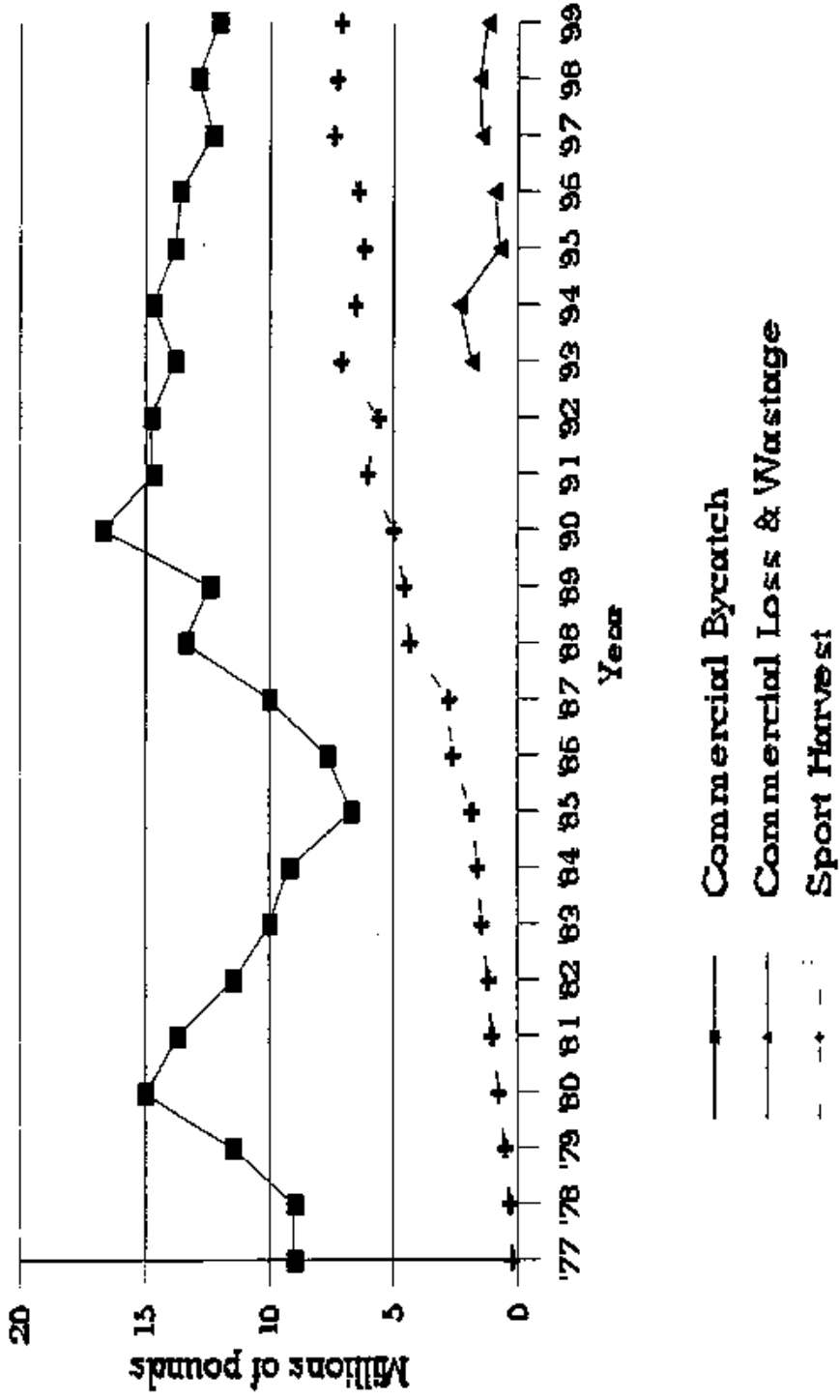


Data from 1984-1996 from IPHC registrations of sport only and sport/commercial registrations

Data from 1997 is from ADFG registration

Data from 1998-1999 from ADFG logbook program (bottomfish only plus salmon & bottomfish combination trips; combination trips may not include halibut since rockfish caught while salmon fishing is listed as bottomfishing); 1999 data preliminary

Comparing bycatch, loss & wastage and sport harvest





January 27, 2000

Council Member
North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage AK 99501-2252

RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Council Member:

Thank you for this opportunity to comment on the *EA/RIR/IRFA for a regulatory amendment to implement management measures under a guideline harvest level and/or moratorium for halibut in Areas 2C and 3A.*

The document is well written, especially in terms of recording the chronology of events leading up to the present. After reading this document, I believe Alternative 1: Status Quo, is the only course of action to take.

I was encouraged to finally see in print, the crux of the problem: *the status quo results in an open-ended reallocation from the commercial fishery to a growing recreational charter fishery.* Put another way, the recreational fishery, which owns the public resource, has increased their fishing effort from one to nine percent of the total pounds of halibut killed, annually. Thus, a more accurate statement of Alternative 1 is *the status quo results in allowing the commercial industry to harvest that portion that is not harvested by the recreational fishery (as it has always been).*

If you select Alternative 2, the commercial sector will be able to restrict the recreational fishery (by limiting charterboat activity), which will result in more halibut for the commercial fishery.

Notwithstanding the lack of being in compliance with federal laws, the most disturbing aspect of this document is the selective use of data to portray a biased position.

On pages x, xi, 36, 38, 44, statements are made that State 1998 logbook data "verifies" or "confirms" figures. Yet, on pages xviii, 145, 158, 178 and 207, the State has gone on record to express concern over using 1998 logbook data. Unsubstantiated data on this issue, is more dangerous than a lack of data, and certainly should not be used to verify anything.

Of particular concern is the calculation of biomass, or poundage, from the number of fish harvested by the recreational charter industry. Page 32 lists one of the problems with sampling length measurements being *non-random sampling*. I wonder if sufficient numbers of fish were actually sampled for statistical purposes. I was told by the Alaska Department of Fish and Game (ADFG) that in 1997 and 1998, halibut sampling by Southeast creel census personnel was done *incidental* to salmon sampling, if time permitted. Yet, this value is freely used to extrapolate numbers of fish to pounds harvested, requiring "the assumption that the samples are representative over a much larger area." Furthermore, I don't understand the statement on page 32, "Overall harvest biomass estimates for each IPHC regulatory area are not affected much by biased sampling..." Therefore I must conclude, "the near doubling of harvested biomass in 1998" (pages x, 36) used to evaluate current recreational charter levels and projected growth, is dubious.

The other curious portrayal of data involves the presentation of exploitable halibut biomass. Mention is made of how the "IPHC considers the halibut resource to be a single population..." where "migration by young halibut cause significant mixing within the halibut population." (p.16) Even though this document pertains to GHIs for Areas 2C and 3A, I think it is very important to have a graph on page 21, showing the removals of halibut for the entire State of Alaska. What happens to young halibut in the nursery sector (Area 4), certainly affects the halibut stock in Areas 2C and 3A. In doing so, the reader can easily see the annual recreational harvest is less than what the commercial industry kills and throws away as bycatch and waste.

I am glad to see mention of the ISER 1997 report. I remember reviewing that document and recall all the caveats given by ISER, on the accuracy of their data. The one that stands out most in my mind, is being limited by time and the US Office of Management and Budget, to formally survey less than 10 people in the charter industry. I am pleased ISER was open to supplementary information offered by bonafide charter operators, to help ISER come to their better estimate of 518 active charter vessels, in 1997(p.137).

This brings me to the promotion by Alaska Longline Fishermen's Association (ALFA), back in September 1993, of the "rapid, uncontrolled growth of the...charter industry."(p.2) The "surge in charter effort in the early 1990s in some small communities (e.g.Sitka)"(p.7) was a paper surge. One of the better statements in this document is, "These [early 1990 charter vessel] numbers may not be an accurate reflection of the actual growth of the charter industry, as some licenses were likely obtained (they are easy to obtain at no cost), but not necessarily fished, due to the Council's announcement of potential limited entry in 1993."(p.137)

Sorry AFLA, there is no tsunami charter fleet out there...only some 200+ boats statewide, doing over 100 charters a year, returned logbooks to ADFG (pers.comm.)

....growth is flat (p.49) with "considerable exit and entry in this fishery." (p.x, 49., 139, 157)

On page 7, "the Council..endorsed a two-prong approach [GHLs and LAMPs] to mitigate the perceived impacts of increased guided charter halibut fishing." However, since the perception of actual growth was incorrect, why is the Council devoting so much time to Alternative 2?

Moving on, this document fails to meet the legal requirements of examining economic consequences of the alternatives. On pages xiii, 59, and 114, it states there is no data for Area 2C. Unfortunately, a well used statement is used again on p.114, "In the absence of critical data and more detailed analysis more specifically geared to GHL issues, the sources following....represent the best available data." Once more, if the best available data is insufficient and incomplete, it is often times more dangerous to base a decision on, than having no data.

Granted this issue has been before the Council since 1993, but for some reason, there is no time to collect accurate information, even though sport harvest has leveled off since 1993. On p.135, 4.2.2.1.3 *Economic impacts of simulated changes in angler participation*, it states, "to be useful in a comparative sense with the impacts of commercial halibut fishing, a similar economic impact assessment is needed for the commercial sector, but this is not an option given time constraints."

Starting on p.159, *6.0 Regulatory Impact Review: Economic and Socioeconomic Impacts of the Alternatives*, I looked for some cost/benefit figures on how these alternatives would affect my business. Under Alternative 1, p.161, in bold print, it reads, "These estimates of growth contain an unquantifiable, but large degree of uncertainty." "There is not enough information to discern whether these losses would be offset by the increases in net benefits....Nor is there enough information to compare the loss of regional economic activity associated with the commercial sector against...the charterboat sector."(p.161)

Under Alternative 2, p.161-201, the costs/benefits seem to revolve around how to share the fish rather than the economic impacts of a GHL on charter businesses in Area 2C. In fact, on p.186, it states, "Because the participation rate model cannot be appropriately applied to Area 2C, no quantitative projections are provided."

Regarding the Halibut Act (p.208) requiring an allocation to be "fair and equitable", Alternative 2 simply is not so, for the recreational sector.

As to meeting the National Standards of the Magnuson-Stevens Act, for NS#1, (p.208), it is hard to imagine Alternative 2 restrictions on the charter fishing industry doing anything but penalizing the "optimum yield" of the recreational fishery.

Page 4 of 4

NS#2 (p.209) requires measures "be based on the best scientific information available." To me, "best" does not equate to effort and expense, nor can incomplete data be construed as sufficient. (Thank goodness we're not dealing with the space program.)

I cannot agree more with NS#3 (p.209). The halibut stock should "be managed as a unit," and Area 4 bycatch and waste should not be conveniently deleted from graphical description.

I don't feel Alternative 2 meets the NS#6 (p.209) requirements. "Variations among, and contingencies in" the recreational charter industry could not have been taken into account because as stated above, there is no economic data for Area 2C and too little is known about the charter industry.

As for NS#8 (p.210), I don't see how Alternative 2 "can provide for sustained community participation" and "minimize adverse economic impacts" when there is no economic data to consider in the first place.

I would like to clarify 7.5.2 Statement of Problem (p.213), listed for Initial Regulatory Flexibility Analysis. This statement was written in 1993, when ALFA started to promote the theory of the surge in the charter industry. Based on the number of charter vessel logbooks turned in for 1998 and 1999, charter growth is flat. The number of "may be"s in the problem statement, makes it clear the perceived problem had no factual basis.

In 7.5.3 Objective Statement of Proposed Action (p.213), the objective "to limit expansion of the halibut charter industry" appears to be moot. The out-of-control growth of the charter fleet was only on paper.

Perhaps the most prophetic statement in this document is a quote from the Statistical and Scientific Committee, p.114, "it is important that all participants in the Council process understand that even if a comprehensive set of studies were available, such models have limited ability to predict the consequences of major changes in the regulatory structure or management strategy. It will inevitably fall to the Council to decide who should gain at whose expense."

Unfortunately, we all know what this means without fair and balanced recreational representation on the Council. Thanks again, for your attention to this issue.

Sincerely,



Beverly P Minn

cc: Secretary of Commerce William Daley
Director of Fisheries, NOAA, Penny Dalton



January 27, 2000

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

Re: Halibut charter allocation

Dear Mr. Lauber,

NorQuest Seafoods operates facilities that purchase and process halibut in Ketchikan, Petersburg, Cordova and Chignik, Alaska. 99% of the halibut we purchase is sold to consumers in the United States. We estimate that NorQuest alone provided the halibut for over 8 million individual meals in 1999. The folks who consume that halibut obviously want, and deserve, the continued opportunity to purchase this fine seafood from the North Pacific.

Commercial exploitation of halibut must be abundance based. Commercial charter operators and commercial fishermen both make their living based on a sound resource fairly shared by the users. If the charter industry receives a fixed allocation, what interest would this user group have in the long term health of the resource? Only with an abundance based allocation will the commercial charter industry have the incentive to cooperate with the management of the fishery.

Each of our facilities that purchase and process halibut also purchase and process other products. Halibut alone does not make or break the plants. However, in today's competitive and dynamic industry, diversification is essential to survival. When some resource is down, diversification allows continued operation. The halibut resource is declining, particularly in 2C and 3A, and establishing a favored system for commercial charter operators would further reduce the product available to us. During the season, we employ over 500 workers in our plants. The communities of Chignik, Cordova, Petersburg and Ketchikan are highly dependent upon commercial fishing for their economies. All businesses in each community are negatively impacted when revenues from commercial fishing decline.

Halibut has been managed by international treaty for many years. It is an example of a fishery that has thrived even through swings in abundance due to the dedication of the United States and Canada to preserve and enhance the resource, and the willingness of all major users to adopt restrictive harvests when the resource required protection. Abundance based management is at the heart of this success, and should not be abandoned by any commercial user of the resource.

NorQuest Seafoods, Inc.


4225-23rd Avenue West • Seattle, Washington 98199
Telephone: (206) 281-7022 • Fax: (206) 285-8159

Crusader Fisheries • Lafayette Fisheries • Silver Lining Seafoods

I would pose one question to the Council: If the halibut resource were on the rise, rather than decline, do you think the commercial charter operators would be sitting still with a fixed allocation that did not allow them to share in that surplus? I think the answer is clear they would not.

Please keep the commercial charter operators allocation at 125% of the 1995 harvest by this group, as you established in 1997. Please provide effective management tools for the regulators to ensure the commercial charter operators live within their allocation.

Sincerely,



John Garner
Vice President

January 26, 2000

The Honorable Rick Lauber
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501



RE: Setting an Abundance-based Allocation (125% of the 1995 harvest) for the Charter boat industry, YES!

Hello, Mr. Lauber,

I am pleased to have the opportunity to write you. My wife and I own a charter business in Juneau, Independent Marine Charters. We are very small and have caught just a little charter halibut, salmon, and rock fish.

We also own commercial IFQ halibut shares, over 15,000 pounds at last year's quota. We invested most of our whole nest egg into our 34' boat and bought 10,000 of the pounds that we own. We fish with our three boys - it's a family business. We often sell more than half our catch at the Juneau docks to the public. This controversy over handing a fixed poundage of halibut to charters has already cost us over \$30,000 in lost value to our IFQ investment.

We understood when investing in halibut shares that we were actually just buying a 'percentage' of the total catch. We knew it would go up and down depending on the cycles of the sea. This is the same principal that the charter boat industry (our charter boat industry) should operate on - a percentage of the whole, NOT guaranteed poundage. The sports fishermen that I have talked to agree that this is the way to be. They know that they also could be hurt by a guaranteed Charter industry poundage.

I understand that the area 2-C charter boats carry 97% non-residents, and this is fine. Emma and I are just as much commercial fishermen when we longline for halibut as when someone pays us to take them fishing: We think both systems should be on a percentage of abundance system. It's the Alaskan way.

We are agreeable and think we should stick with the Council's issue of 125% of the 1995 harvest. As charter boat operators we can live with this poundage by vessel trip and bag limits. What is important to the charter customer from out of state is the opportunity to go fishing. What is important to the resident commercial and personal use fishermen is the production of food for the table and money for the family.

We are not in favor of a moratorium on halibut charter boats. We don't want to set up a few folks for life with another limited entry fishery. Give us (the charter boat industry) a percentage of the catch and introduce other limits so that the boats that provide the best 'Alaskan experience' will prosper.

Thanks, please call us any time before March 15th at 907-463-3262.

A handwritten signature in black ink, appearing to read "Ted and Emma Deats". The signature is written in a cursive, flowing style.

Ted and Emma Deats (and David, Joseph, and Jonathan)
PO Box 87
Juneau, AK. 99802

CC Governor Tony Knowles



Lone Fisherman, Inc.

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

RECEIVED
JAN 31 2000
N.P.F.M.C.

January 24, 2000

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

Dear Chairman Lauber:

I am writing you as a family member of a life long, primarily longline, fishing family. My husband, John, literally grew up on fishing boats and has never missed a season of fishing his entire life. I, myself, longlined with him for over 10 years before we had our children. My father-in-law, Jake, taught his children how to fish and now my husband and his brother are teaching both their own children and their nephews how to work hard. Children and young adults need to know that hard work will pay off, both monetarily and intrinsically. **My family, both immediate and extended, are totally dependent upon fishing for both our income and lifestyle.** To implement such a strain on the halibut fisheries would be devastating to my entire family.

We have invested heavily in the longline industry since the implementation of the IFQ system. We do not have any loans on quota itself but we have invested heavily in a boat that enables us to harvest the quota that was earned by our previous fishing endeavors. The total capital investment we have in longline fishing is about \$900,000.00. This figure would be for both halibut and sablefish. If we were to separate this figure, half of it would be for halibut. So, our total capital investment for halibut would be \$450,000.00. We are still in debt on the loan for our fishing boat, which we purchased after the implementation of the IFQ fishery. We waited patiently for many years to see what would happen with the industry before we invested very, very heavily in our new boat. Halibut fishing and the importance of the setting of the quotas has a very BIG impact on us, our season, and our family. It is important to remember that it also has a big impact on ALL of the fishing communities throughout Alaska. We recently moved to Petersburg from Pelican and I see how the fishing industry impacts both of these communities VERY heavily. I can only envision that it impacts the rest of the state as drastically as it does these two communities that I have first hand experience with. I can't express to you how important the fishing industry is to Alaska. Fisherman make their living out on the ocean during the fishing season. In



Lone Fisherman, Inc.

John C. Phillips, Pres.

Maura J. Phillips, Sec. Tres.

P.O. Box 1315

Petersburg, AK 99833

PH: 907-772-2554

FAX: 907-772-2553

EMAIL: lfincjmp@mitkof.net

their off season, they spend time working on their boats and preparing them for the following season. My husband is always on his boat fixing or replacing something that got worn out in the previous season. Charter boat operators often have very lucrative jobs in the off season and do the charter thing for enjoyment, change of pace, and yes, the money is becoming a big factor in the charter boat industry (important to note, it is an industry!!). I am just trying to express to you how **fishing is our one and only source of income**. We never have the time and/or money to take vacations. The only time we ever really leave the state, is to occasionally take our boat south for work that can't be done locally. Whereas, many, many charter boat operators live outside the state and leave to go elsewhere during the off season. With them goes the dollars earned harvesting local halibut as well as other species of fish. I want to stress to you how important fishing is to my NATIVE ALASKAN family!!!!

Commercial fisherman are the ones that originally brought the charter issue before the council. Commercial fisherman are still, seven years later, trying to get the issue resolved with the council. We have asked for the same thing throughout these years. All we have asked is that you implement an upper bound limitation on the expansion of the halibut charter fleet. **There needs to be objective, yet effective measures to restrain the charter fleet that will hold them to the upper boundaries set by the council.** It is VERY important that you realize that HAD this been dealt with when commercial fisherman first asked, we would not have the current involvement and issues that are being pressed upon you by the charter fleet industry today. **It is inaction by the council, that has put us in the current situation.** If action had been taken back in 1997, there would not even be half of the charter boat operators there are now and thus the fight for the fish would have been lessened significantly. Now, you have a hot issue. The fisherman have conserved for years. They have agreed to cuts when the halibut commission deemed necessary. **We did not put up with all the cuts, conservation measures, size limitations, tagging programs, and observers on our boats over the years to see such a large amount of the resource being turned over to the charter industry, who I might add has had little or no regulations or watchful eyes upon them and their industry.** I have seen chicken after chicken brought up docks throughout Southeast Alaska. I have seen pre-packaged, pre-frozen boxes and coolers of product being brought up docks. Is this fair when the commercial fisherman is fined heavily when he tries to bring home even one fish for dinner?



Lone Fisherman, Inc.

John C. Phillips, Pres.

Maura J. Phillips, Sec. Tres.

P.O. Box 1315

Petersburg, AK 99833

PH: 907-772-2554

FAX: 907-772-2553

EMAIL: lfincjimp@mitkof.net

I want the council to know that the proposal by the Department of Alaska Fish and Game is totally out of line!!! Could it be that many of the retired fish and game workers (who had full benefits and retirement packages) are now charter boat operators??? I don't know if this is a true statement or not but it sure has me wondering, shouldn't you be? **The proposal put forth by fish and game is not directly linked to the fixed or stair stepped allocation in pounds that has been the tradition in setting quotas.** It is CONTRARY to Alaska's management principles and totally undermines the States management authority. If you should establish a priority preference for one gear group, how are you going to handle the others...i.e. local sport fishers and subsistence users. I certainly hope that the council is more effective than our legislators and representatives in dealing with subsistence!!! For you to show or set a preference with one group, charter vessels, is opening a huge can of worms where no real solution is viable.

In summary, my **family is totally dependent** upon fishing and halibut fishing plays a significant role in our fishing income. Secondly, my family business has a **very large investment** in the halibut fishery including a large loan at a local Alaskan owned bank. Another thing to remember, is the **impact upon our communities** that are dependent on fishing and fishing families. Next, is the proposal put forth to you by the **fish and game**. It is insane and **does not deal with the traditionally based abundance based management** that is usually used by the state as well as the halibut commission. Finally, is the issue that it was the **commercial fisherman that brought this issue before you and we are still here....**trying to get this issue settled by using the same means and same procedures used over the past many, many years.....an **abundance based fair proposal based on the figures gathered in 1995**. The current figures are either inaccurate or unexplainable. There has been no authority involved in the taking of either figures as there has been in the commercial fisherman's conservation methods. I urge you to use the 1995 figures, especially since it was seven years ago that the issue should have been resolved.

I thank you for your time, patience, and dedication to the fishing industry. I realize you put in a lot of time and energy to try to do a good job. It is appreciated. I hope you can come to a fair solution to the problem before you.

Sincerely,



Lone Fisherman, Inc.

John C. Phillips, Pres.

Maura J. Phillips, Sec. Tres.

P.O. Box 1315

Petersburg, AK 99833

PH: 907-772-2554

FAX: 907-772-2553

EMAIL: lfincjrp@mitkof.net

cc: Governor Knowles
Halibut Coalition
Alaska Longline Fishing Ass.
Jake Phillips
Mr. Joe Kyle
Don Young
Ted Stevens
David Benton
Frank Murkowski
Fran Ulmer
Petersburg Vessel Owners Ass.
Clarence Pautzke
Fishing Vessel Owners Ass.....Robert D. Alverson.....could you please send

a copy to anyone that
that I may have missed.
Thanks...Maura

Jan. 24, 2000

Dear Council Members,

I am writing this letter as a concerned Halibut Charter Fisherman. I am sole proprietor of one boat and fish out of Deep Creek, in Cook Inlet. I strongly support conservative management of the Halibut resource and fair and reasonable access to the Halibut resource for all users.

I am opposed to adoption of a guideline harvest level for Alaska's Halibut sport fishery at this time. We do not catch that many fish given the overall abundance and harvest in Alaska waters. The GHL being proposed at 4.7 to 6.2 million pounds is unrealistically low given that this is a public resource and that the commercial harvest is approximately 62 million pounds, and bycatch amounts to 12 to 14 million pounds. Who is getting more than their share of the resource? These GHL levels being proposed by the commercial industry are too low and will not provide fair or reasonable access to sport users.

In the last three years alone, commercial longliners opportunity to harvest increased by 50% while the sport opportunity remained the same. Is this fair? Since the implementation of IFQ guidelines, longliners have moved into popular sport areas and skimmed off the excess halibut, causing local depletion of nearshore stocks.

At the same time Charter boats have been forced to run greater distances with bigger faster boats to fulfill clients wishes. I would rather see some regulation on the number of trips i.e. 1 trip per boat per day and a closure of nearshore areas to longliners during May, June, July and August. This would go a long way to stop nearshore depletion of valuable halibut stocks and allow those stocks to build up to sustainable levels.

Regardless of the path you take there should be no reduction in the bag limit. Any reduction in the Charter fleet limit will only lead to illegal guiding operations and loss of business to established charter boats. There simply isn't enough enforcement to control the fishery. I speak from experience having spent 25 years in Fish and Wildlife enforcement off the Oregon Coast.

Remember that you as Council members have a duty to represent all citizens rights to access the public resource. We all know how powerful the commercial fish lobby is and how it has in the past done some great things for fisheries in general. But in order for it to survive it must be a good neighbor in partnership with other user groups. Together we can all work to the betterment of a viable fishery for everyone.

Thank you for your attention and please feel free to call on our industry for assistance.

Sincerely,
Joseph R. Schwab
Captain J Charters
P.O. Box 72
Clam Gulch, Ak 99568

cc:
Dennis Austin
Washington Fisheries

David Benton
ADF & G

John Bundy
Glacier Fish Co.

Penny Dalton
NOAA

David Fluharty
University of Washington

Steve Pennoyer
NOAA

Linda Behnken
Alaska Longline Assoc.

Frank Rue
ADF&G Commissioner

Tony Knowles
Governor, Alaska

N.P.F.M.C

JAN 31 2000

RECEIVED

Terry Garcia, Asst. Secretary
Dept. of Commerce

Sen. Ted Stevens
Washington D.C.

Sen. Frank Murkowski
Washington D.C.

Rep. Don Young
Washington D.C.

Dear Mr. Senator, available to Council members.
Please make this letter to solve these problems. The
we need to work together to solve these problems. The
solutions being proposed do not do this. There is a wedge
being driven between sports, and/or commercial interests.
No one will win if this happens.
Thank you

January 22, 2000

Rick Lauber
North Pacific Fishery Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501

RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Mr. Lauber,

Greetings from a 70 year old fishermen who has fished halibut back in the 1940s with my dad in Alaska.

I don't write many letters but now I am writing to oppose an open-ended quota for the 'COMMERCIAL' Charter Boat fleet! I got some IFQ based on my fishing experience and also bought a few pounds. The charter boats should be under a percentage-type quota, based on abundance, just as we are. Perhaps they should buy into the same IFQ as the longliners are in. We should let any boat willing to buy IFQs fish them as charter or longline.

Under one ill-conceived proposal we are about to set up certain ex-Fish and Game fellows for life with exclusive halibut charter licenses. This will keep newcomers out but pay off very handsomely for the operators who misinformed their clients and had them fill out duplicate postcards by the hundreds. The Department of Fish and Game is lobbying for them too.

I would like to tell you more about my commercial fishing life, seining for 16 years, and all my hard work with my dad. So call me sometime for a cup of coffee.

Mick Haffner, FV Outcast.
2710 Engineers Cutoff Road
Juneau, Alaska 99801
789-7846



cc Governor Tony Knowles

Honorable Rick Lauber, Chairman,
NPFMC

RECEIVED

JAN 31 2000

N.P.F.M.C

Dear Chairman Lauber,

Half a million dollars! This is how much money I owe for halibut quota shares I have purchased. I invested this money in an industry nearly a century old. I invested based on a new management scheme by our federal government that suggests stability and long term viability, and that encourages the type of investment I have made. In fact, this season the government will begin charging all commercial halibut fishermen a percentage of our gross stock to finance such investment. I already have two NMFS quota share loans myself, as well as a loan from First Bank. I am counting on this investment to put my children through college and to provide for my wife and I in retirement.

I refuse to believe the members of the NPFMC will not do the rational thing by capping the charter catch, and by establishing abundance based management. If any of you are even thinking about any other decision I beg of you to reconsider. The charter industry was told years ago to prepare for capping and management of its fishery. It is time for that to happen. Don't let a new user group drive me into bankruptcy.

Sincerely,

David Barth

David Barth
12816 311th Ave. S.E.
Sultan Wa. 98294
360-793-1965
907-772-2108

FROM: [REDACTED]

THE SUBJECT IS: [REDACTED]

DATE: [REDACTED]

Amended: 1-27-2000

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

RECEIVED
JAN 31 2000
N.P.F.M.C

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

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

At this meeting a consensus was reached on the following issues

1. We did not support a fixed allocation for guided sports halibut industry. We favored a percentage based allocation.
2. Consensus was reached on supporting the 1997 GHJ already adopted.
3. We also came to consensus on management tools that the NPFM Council could use to accomplish their goal of the guided sports halibut fishery staying within their allocation.
4. We agreed it was inappropriate for the Alaska Dept. of Fish and Game Sports Division to advocate on allocation issues. The ADP&G Sports Division should stick to management not allocation.

I would like to include in my testimony a statement written and submitted to our advisory board by our guided sport charter members. It reads: This letter is from the representatives of the guided charter fishery and its members at the Port Alexander Fish and Game Advisory Committee.

We believe that guided fishing is a commercial enterprise, therefore the management of guided charter fishermen should be separated from that of residential recreational fishermen.

We believe that the charter fishermen's salmon and halibut quotas should be based on a percentage of the total salmon and halibut quotas for these fisheries. Guided fishermen should be required to stay within their quota.

We understand that commercial fishing is an essential part of our local economy. We wish to diversify that economy not to monopolize it. Our number one, highest priority, is the health of the fisheries and the environment that is essential to them.

FROM : BACK BAY BOTANICALS

FAK NO. : 907 568 2226

Jan. 29 2000 04:09PM P3

Therefore, we stand against any practices that are wasteful of the resource whether committed by commercial, charter or sport fishermen. We strongly support management that protects the health and diversity of fish stocks in Alaska.

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

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

Marty Remund

Chairman

Port Alexander Fish and Game Advisory Committee

FROM : BACK BAY BOTANICALS

FAX NO. : 907 568 2226

Jan. 29 2000 04:15PM P4

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

RECEIVED
JAN 31 2000
N.P.F.M.C

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

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

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

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

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

Where as: We feel that ~~residence~~ should be defined as a ~~permanent~~ permanent place of residence

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

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

FROM : BACK BAY BOTANICALS

FAX NO. : 907 568 2226

Jan. 29 2000 04:10PM P5

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

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

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

Adopted this 17th day of November 1999

[Signature] Chairman *[Signature]* Secretary
Marty L. Remund

Vote all — In favor 0 Opposed 0 abstained _____



A-WARD CHARTERS

P.O. BOX 631 ANCHOR POINT, ALASKA 99556

(907) 235-7014

January 30, 2000

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

RECEIVED

JAN 31 2000

N.P.F.M.C

Dear Chairman Lauber & Council members,

As a 14 year halibut charter owner and operator I wish to convey my position on the up-coming decision on the charterboat industry management.

With as much science and experience that is available from members of the council, staff, and associated agencies I still don't see how the GHL can be viewed as fair management of halibut for all users. The guided recreation GHL is not the proper management tool to use in separating a recreational allocation from the commercial allocation, a charterboat is not the separating factor to utilize in this decision. How a recreational fisherman reaches his recreational fishery location should not determine his opportunity under a recreational license. The recreational users will challenge the differential in the license and the opportunity.

Guided recreational fishermen will want to change the GHL percentage to allow for more fish to be accessed by this user group, especially considering the increased economic impact, but how will you decide on an increase when you are setting a limit at this time. Will the process take an additional 7 years as this issue has? Please do not implement a GHL that cannot be adjusted, or will take more council time only to face the same public turmoil.

Please think about the future of this decision and how the GHL is more problematic than this small removal justifies. Don't jeopardize the viability of many charter operators in Alaska's small coastal communities in finding out the GHL is inappropriate.

I would like to recommend that the council place a firm moratorium on new entry into the charterboat industry using the June 24, 1998 Control date adopted by this council in 1998, continue the logbook program and port monitoring of harvest landed. Council should then develop a discussion paper on integrating the halibut charterboat industry into the existing Individual Fisherman's Quota Program as submitted to you earlier by myself and supported by others.

Most Respectfully,
Robert Ward

MEMBER:

Alaska Sportfishing Association, Alaska Sportfish Council, Anchorage Convention and Visitors Bureau,
Boat Owners of the United States, Homer Chamber of Commerce, Homer Charter Association,
International Game Fish Association, Make It Alaskan, National Association of Charterboat Operators,
National Rifle Association, North American Fishing Club, North Pacific Fishery Management Council Advisory Panel,
Recreational Fishing Alliance.

RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Chairman Lauber, North Pacific Fishery Management Council

My name is Jesse Will, I am 18 years old and live with my mother in Anacortes, Wa. Each summer I go to Alaska, (where I was born and raised originally), to longline for halibut and blackcod with my father who is a commercial fisherman. I've been fishing with my dad since I could walk, and my mother and I depend on income from longlining for about 50 percent of our income.

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars pass through the hands of many different people in my town. My family has invested heavily in IFQ because of the stability promised by the government. Reducing the commercial harvest will reduce the of IFQ and my father's boat. It will also impair the ability of people to pay back both boat and IFQ loans.

Anyone who relies on a sustainable resource for a living understands the need for abundance based fishery management and accepts the risks associated with fluctuations in harvest. Commercial fisherman have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Excluding the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the State's credibility. Abundance based management has been a cornerstone of a successful management program and it is not wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

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

Sincerely, Jesse Will

Jesse Will 1/30/2000

RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Chairman Lauber, North Pacific Fishery Management Council

My name is Sandy Will. Many relatives and friends of mine depend on longlining as a moderate to large portion of their annual income, including myself.

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars pass through the hands of many different people in my town. My family has invested heavily in IFQ because the government has promised stability. Reducing the commercial harvest will reduce the value of IFQ. It will also impair the ability of people to pay back both IFQ and boat loans.

Anyone who relies on a sustainable resource for a living understands the importance for an abundance based fishery management and accepts the risks associated with fluctuations in harvest. Excluding the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the State's credibility. Abundance based management has been a cornerstone of a successful management program and it is not wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

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

Sincerely, Sandy Will

Sandy Will 1/30/00

RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Chairman Lauber, North Pacific Fishery Management Council

My name is Thomas Will. Many relatives and friends of mine depend on longlining as a moderate to large portion of their annual income, including myself. I have been commercial fishing for over 20 years now, and have longlined for halibut and blackcod throughout all of those years.

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars pass through the hands of many different people in my town. I have invested heavily in IFQ because the government has promised stability. Reducing the commercial harvest will reduce the value of IFQ and my boat. It will also impair the ability of people to pay back both IFQ and boat loans.

Anyone who relies on a sustainable resource for a living understands the importance for an abundance based fishery management and accepts the risks associated with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Excluding the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the State's credibility. Abundance based management has been a cornerstone of a successful management program and it is not wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

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

Sincerely, Tom Will

Thomas Will
13000

Homer Charter Association

P. O. Box 148 Homer, Alaska. 99603 (907) 235-2282 phone/fax.
January 30, 2000

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

RECEIVED

JAN 31 2000

Dear Mr. Chairman & Council Members,

N.P.F.M.C

The Homer Charter Association is a trade association with over 45 paid members representing over 60 charterboats servicing over thirty thousand halibut recreational fishermen annually in Homer, Alaska.

Once again the Homer Charter Association is recommending the NPFMC take NO Action on the charterboat GHL, until the guided recreational fishery has reached a fair allocation level. Of the Alternatives under consideration only STATUS QUO is the acceptable choice for this council to make considering all available and recent information. There is no justifiable reason for the restrictions proposed.

The current GHL limitations and the small percentage of halibut resource the GHL was estimated to represent is not of sufficient quantities to service the desires and rights of the very small guided recreational fishery. The charterboats do not constitute a commercial fishery by servicing the needs of the guided recreational fishermen, nor does the use of charterboats by recreational fishermen constitute their recreational fishery a commercial fishery. The council should in their best conscience maintain the current International Pacific Halibut Commission's commercial TAC setting process with all bycatch, wastage, and recreational fishery harvests removed prior to the commercial allocation. We maintain our guided recreational fisherman's harvest is a non-commercial removal, and should be treated as such.

The problematic GHL will cause more problems and conflicts between the users than it will prevent, and the charterboat industry is now at risk of economic instability. The recreational fishery will require an increase in the GHL immediately due to the reduction of stocks leaving the recreational access disproportionately lower than the commercial bycatch and wastage, this we will not accept. The council has failed to create a mechanism for increasing the GHL and a fixed percentage is not acceptable, this will be tested also. We advise this council to leave the process as is and look further into bycatch reduction measures available to better utilize the full halibut resource and leave this tiny fishery alone.

Michael Coates
President



RECEIVED
JAN 31 2000
N.P.F.M.C

Dear Chairman Lauber, North Pacific Fishery Management Council

My name is Brian Will. Many relatives and friends of mine depend on longlining as a moderate to large portion of their annual income, including myself. I have been commercial fishing for over 12 years now, and have longlined for halibut and blackcod throughout 7 of those years.

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars pass through the hands of many different people in my town. My family has invested heavily in IFQ because the government has promised stability. Reducing the commercial harvest will reduce the value of IFQ and my father's boat. It will also impair the ability of people to pay back both IFQ and boat loans.

Anyone who relies on a sustainable resource for a living understands the importance for an abundance based fishery management and accepts the risks associated with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Excluding the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the State's credibility. Abundance based management has been a cornerstone of a successful management program and it is not wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed reasonable growth.

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

Sincerely, Brian Will

Brian Will 1/30/00

Cordova District Fishermen United

Celebrating 65 Years of Service to Commercial Fishermen in Cordova, Alaska
P.O. Box 939 Cordova, Alaska 99574 / Telephone (907) 424-3447 / Fax (907) 424-3430

January 29, 2000

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

RECEIVED

JAN 31 2000

N.P.F.M.C

SENT VIA FACSIMILE TO (907) 271-2817

Dear Chairman Lauber and Members,

Cordova District Fishermen United (CDFU) represents the fleets of Area E in Prince William Sound and the Copper River Delta and Flats. Our Board of Directors recently authorized formation of a Groundfish Division which will provide specific comments to you on issues of concern to their constituents. This letter will address concerns of our general membership.

We are very concerned about the possibility of any allocations being made based upon a fixed rate of harvest. All allocations must be abundance-based so that all user groups share in conservation of the resource. Those of us who rely on sustainable fisheries resources for our livelihoods understand the cyclical nature of the resource, and accept it. Separating one user group from abundance-based management is poor public policy and does not encourage good stewardship of the resource. We cannot accept any move away from abundance-based management by any fisheries resource managers for any species.

Additionally, we fully support maintenance of the viability of current halibut IFQ's. Reduction in the IFQ halibut quota destabilizes an industry invested in by individuals who did so based upon promises made to them by the government. Commercial growth has been limited to provide that stabilization. The sport industry must also limit their growth to provide for stability of their industry. It is irresponsible to devalue the commercial halibut industry because of the unfettered growth of another sector. We believe that the halibut GHL that was decided in 1997 was fair, generous and deliberated following four years of study and public input.

Commercial fishing is the cornerstone of the economy of Cordova and many coastal communities in our state. Please do your part to ensure responsible management and the stability of that industry by providing for abundance-based allocations and not allowing the unrestricted growth in the sport sector of the halibut fishery to devalue the commercial sector.

Sincerely,

Sue Aspelund

**Sue Aspelund
Executive Director**

**cc: Governor Tony Knowles
Senator Georgianna Lincoln
Representative John Harris**

P.O. Box 383
Petersburg, Alaska 99833-0383
29 January 2000

RECEIVED
JAN 31 2000
N.P.F.M.C

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

Re: Harvest Guidelines for Commercial Charter Industry

Dear Chairman Lauber:

Although I began my commercial fishing career in 1964, I am a relatively new entrant into the Alaska longline fishery, having started fishing halibut in 1982 onboard my then 70-year old wooden troller.

Fishing alone with a primitive operation and very little gear, I gradually increased my efficiency and productivity by investing in ever larger boats and prospecting more productive grounds.

By 1993, I owned a 46' steel boat, had three crew members, and harvested 30,000 pounds of 2C-halibut as well as 55,000 pounds of east Yakutat blackcod. My 1994 harvest record was almost identical.


Because of my cautious growth and inexperience in the longline fisheries, I woke up in 1995 with just over 7,800 pounds of 2C-halibut and no blackcod, having been awarded IFQ poundage based on my earliest and poorest years. Had the last five years been qualifying ones, I would have been unblocked in both halibut and cod, and could have retained my crew.

Having lost 91% of my longline poundage overnight, I began a personal rebuilding program. With hard work and a major financial commitment in the form of two different bank loans, which I have paid off, and most recently an IFQ loan from the National Marine Fishery Service, I have increased my halibut poundage to my 1993 and 1994 levels. I have also recently re-entered the blackcod fishery in a small way. My IFQ fishing now accounts for more than 75% of my annual income.

These loans were based on an expectation by all parties of a stable fishery within the bounds of harvestable biomass, based on science and without a continuing resource reallocation to a virtually unrestricted commercial charter fishery. Continued reallocation will negatively impact my income, and impair my ability to repay my Federal loan.

There have been a number of proposals placed before you, and I suppose that I should support 125% of 1995 as being the least damaging to me. However, I can't! I can, though, support an abundance based management plan for the commercial charter industry based upon their average catch percentage from the last five years. I also see no reason why they couldn't buy IFQs like any other commercial fisherman as long as they can meet all eligibility requirements. That is the way that I, as well as others, have been able to expand our businesses, and could be a way of growth for the commercial charter industry.

Sincerely,



Charles E. Wood
F/V Talon

cc: Governor Tony Knowles; Halibut Coalition

Alaska Sportfish Council

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

January 23, 2000

Mr. Rick Lauber, Chairman
North Pacific Fishery Management Council
605 W 4th, #306
Anchorage, Alaska 99501

RECEIVED
JAN 31 2000

N.P.F.M.C.

Dear Mr. Lauber:

RE-Comments on Guided Sport GHL

The Alaska Sportfish Council represents the interests of sport fishermen, sport fishing and associated businesses providing a service to sport fisheries. Our membership numbers some over 200 at this time. First and foremost we support conservative management of our halibut resource and would look forward to a comprehensive management plan for Alaska's halibut fisheries in which recreational fisheries are recognized and provided for.

I have reviewed the latest draft of the GHL assessment document. I had 14 days for review and response—that's pretty close to 30 days. The staff did a good job, given the short time frame, in getting more information together, however were still missing critical data on Southeast and other areas subject to potential regulation. I really question the adequacy of the information available, given the magnitude and scope of the decision to be made.

The only alternative that we can support at this time is STATUS QUO. This is because of a procedural error which failed to give the sport fishers subject the proposed regulation an opportunity to participate in determination of the GHL levels. As a consequence, the proposed GHL levels were determined only by commercial interests seated in the Council process, and also compete for the same fish. We do not consider this fair public process. Also, the proposed GHL levels are too low to provide fair access for sport anglers subject to this regulation. **THE GUIDED HALIBUT SPORT FISHERY SUBJECT TO THE PROPOSED GHL (CAP) TAKES ONLY FIVE PERCENT OF THE TOTAL HALIBUT REMOVAL IN ALASKA.** We really question the need to cap a segment of the public sport fishery that takes only five percent of the total utilization, especially when commercial fisheries annually waste nearly three times as much.

We feel that the procedure taken to determine the GHL levels, as well as the levels themselves may be in conflict with sections of the Magnuson/Stevens Act, Executive Order 12962 on Recreational Fisheries and provisions of our Constitution.

Should the Council choose to move forward with the GHL concept, we ask you to incorporate the following into your decision.

Apply the GHL in a "fixed" concept rather than fluctuating directly with biomass. Alaska's halibut sport fishery has never been abundance-based, while the commercial fishery has been. As a consequence, sport harvest opportunity has been restricted to two fish per day since 1975, while commercial harvest opportunity increased some 360%. This in itself is a supreme example of unequal access to a commonly held resource. A GHL based on abundance will—

- promote continued excessive benefit to commercial users,
- have very detrimental impacts on the sport fish industry.

- promote unequal access to sport fishermen who pay equally for equal access to the resource,
- will be very problematic for the managing agency to execute, and
- require disproportionately high costs for management of a minute segment of the halibut harvest.

We ask you to apply the GHL to the CEY prior to deduction for commercial bycatch and wastage. Should you not agree with this, we would certainly hope you would agree that sport anglers should not be held accountable for wastage associated with the longline fishery.

In Issue 4, Option 1, the GHL is a LOSE/LOSE for the guided anglers and sport fish industry. For example, if the GHL is reached, anglers opportunity will be reduced the following year to leave more fish in the water for commercial use. If the GHL is not reached, uncaught fish will be rolled over into the commercial allocation the following year. This is why we support the sport fish-banking concept. We cannot support restriction of the guided sport fishery when there is commercial allocation left uncaught on the grounds.

We would support the concept of a moratorium on charter boats in the guided sport fish industry with following caveats.

--The moratorium is implemented as only an interim "time out"(two or three years) to address the following.

--We entertain the concept of investigating an IFQ program based on 1998,1999 data for charter boats in which quota is transferable. We have put a lot of thought into this and have additional ideas on the IFQ concept

--The GHL would be used only to determine the level of guided angler harvest and would disappear upon initial issuance of IFQ.

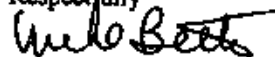
--Move forward on Local Area Management Plans to address local issues.

A guided sport IFQ program would appear to address the commercial industries concern on "open ended allocation" and could be much less disruptive to guided anglers and sport fish industry than a GHL type management plan. A guided sport IFQ program coupled with Local Area Management Plans may go a long way in solving everyone's problems. I think the IFQ concept is worthy of further investigation given the alternatives.

In closing, we ask that you thoroughly consider comments from sport fishermen and the sport fish industry as well as state and federal management directives and constitutional issues in making your decision. Even though your decision will involve only about five percent of Alaska's halibut harvest it will impact no less than 100,000 to 200,000 sport fishermen and associated businesses.

Please contact me if I can provide more on this issue.

Respectfully



Mike Bethers,
Executive Director

CC.

Governor Tony Knowles
Secretary of Commerce Wm. Daley
Senator Ted Stevens
Representative Don Young
Senator Frank Murkowski
Director of Fisheries, NOAA, Penny Dalton
Commissioner, ADFG, Frank Rue
Director, RFA, Jim Donofrio
President, IGFA, Mike Leech
Director, ASA, Mike Nussman

Phone 541 488 6403
Fax 541 482 6033

1177 ASHLAND MINE (2)

ASH ANV
CR 97520

January 28, 2000

RECEIVED
JAN 31 2000
N.P.F.M.C

Honorable Rick Lauber, Chairman
North Pacific fishery Management Council
605 West 4th Ave. Ste 303
Anchorage, AK 99501-2252
fax (907) 271-2817

Dear Sir,

I support granting the charter fleet a percentage allocation that is based on abundance and historical levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

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

All those who rely on the sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Delinking the halibut charter harvest from abundance based management is poor public policy, gives the charter operators now incentive for conservation, and undermines the State's on ability. Abundance based management has been a corner stone of successful arrangement program and it is not wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

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

Sincerely,

Roger Benney

Kodiak salmon and halibut commercial fisherman

Copy: Governor Tony Knowles, State of Alaska, PO Box 110001, Juneau, Ak 99811-0001

Sincerely,

Roger Benney

Your name goes here

Mr. Rick Lauber
Chairman NPFMC
605 W 4th Ave, suite 306
Anchorage, AK 99501-2252

RECEIVED

JAN 31 2000

N.P.F.M.C

Jan 26,00

F/V Mar-Jo II
Robert Nyman
Ronald ,Judy,
Lee Ann and
Carolyn Nyman

Dear Mr Lauber,

My brother Ron and I are third generation longline commercial fishermen. We fished halibut with our grandfather who had his own boat, and dad both when we were growing up. We both were born and raised in Juneau.

We both worked and broke in on halibut boats that fished out of Juneau.

I hope you would support us in this fishery. Area 3A and inside waters area 2C, that the charter boat people want for nothing. Let them buy into this fishery just like we did.

My brother Ron and I bought this boat back in 1980, it is a 54' halibut boat, we also fish blackcod, powertroll, and crab fish. We make our living 100% from fishing. We paid for this boat and gear with a lot of sweat and tears, each of us have homes here. Ron has a family, one of his daughters goes longlining with us during the summer season. We also employ sometimes two to three crewmembers throughout the fishing season. We all spend our money here on taxes, homes, fuel,gear, cars,trucks and the occasional breakdown paid for at our local machine shop.

We request that the NPFMC establish a guided halibut limit of 125% of the 1995 charter catch for areas 2C and 3A.

All users of halibut need the assignment of a fixed percentage of the available harvest. The purpose of the I.F.Q. system was to stabilize our fishery. Please avert the eclipsing threat this new and rapidly expanding user group poses to our existing longline halibut fishery.

Sincerely,

Robert E. Nyman
Ronald E. Nyman

cc Gov Tony Knowles

F/V MAR-JO II
2395 AURORA CT.
JUNEAU, ALASKA
99801

Sitka Charter Boat Operator's Association

PO Box 2422
Sitka, AK 99835

Phone 907-747-3736
Email sitkafish@aol.com

January 28, 2000

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

RECEIVED
JAN 31 2000
N.P.F.M.C.

Dear Chairman Lauber,

The members of the Sitka Charter Boat Owners Association want to go on record with our position regarding the halibut issue before the North Pacific Fishery Management Council.

We trust that the Council will keep in mind that despite frequent testimony to the contrary, this is not a conservation issue. The fine work of the International Pacific Halibut Commission continues to ensure the long-term health of the resource. A restrictive GHL will protect the economic interests of IFQ shareholders. The public pays the price in diminished recreational access to the resource.

We see the GHL Analysis as incomplete and flawed. We remain particularly concerned about a lack of economic data on the Area 2C guided industry. We don't see how the analysis points the council in any particular direction for allocating the resource in ways that best serve the American public. Three years after the 1997 decision and nearly 7 years since this alleged problem was brought before the Council, we are left with incomplete data and allocation formulas based on historical consumption.

How do these historical use patterns reflect the best use of the resource? How do they address proper public access to the resource? How do we deal with changing demographic patterns in the state of Alaska and nationally? How does allocation move from one sector to another to address changing demands by the American public?

Given the weakness of the analysis and the lack of data to indicate runaway growth in the guided sector (see enclosed tables). Given that the GHL fails to fully provide for and account for the future of all user-groups including non-guided sport fishing and subsistence, and is therefore not comprehensive, we support Alternative 1: Status Quo.

We are fully aware that the Council appears ready to act on the GHL despite our objections. In the event that the Council moves in the direction of Alternative 2, we suggest the following options as having the least destructive impacts public access to this healthy resource and our businesses:

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

Option 2: Fixed Range in numbers of fish.

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

Option 3: A three-year rolling average

Option 4: A percentage to the CEY by area after non-guided sport and personal use deductions are made, but prior to deductions for commercial bycatch and wastage.

If the GHL is adopted, we recommend the following management measures in this order.

1. Moratorium.
2. Prohibit guided halibut charter captain and crew from catching and keeping halibut.
3. Restrict vessels to one charter trip within a calendar day.
4. Annual bag limit.
5. Line limits.

Note: We consider a reduction in the daily bag limit the least desirable and most destructive management measure. We think that measure should only be employed when the resource is at extremely low levels and conservation demands extreme measures:

Issue 5: Establish a moratorium on the halibut charter industry.

Option 1: Establish an area-wide moratorium

If a GHL is put in place, we support a moratorium on the guided halibut fleet. We want it noted that a good deal of speculation in the registration for charter boat licenses has occurred over the past five years. It's important that any moratorium program sort out the speculators from those who have invested time, money, and effort in building their living in the guided sector.

The moratorium should be designed to accomplish two goals: 1) Create a fleet size that allows for long term stability with a two halibut bag limit, except in times of conservation concern, and 2) Grant entry to vessels that have actively participated in the guided fishery. The best method to achieve this goal is to minimize the requirement on years of participation while maximizing evidence of participation.

We support the following regarding moratorium:

Years of Participation:

Option 3: 1 of 3 (1995-1997) plus a 1998 logbook

Owner vs. Vessel:

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

Evidence of Participation

- • **Mandatory**
IPHC license (for all years required)
CFEC number (for all years)
1998 logbook
- • **Supplementary:**
Alaska state business license
Sportfish business registration
ADF&G guide registration
Enrollment in drug testing program (CFR 46)

Vessel Upgrade

Option 1: license designation limited to 6-pack, if currently a 6-pack, and inspected vessel owner limited to current inspected certification (held at number of people, not vessel size).

Transfers will be allowed

Duration of Review

Option 1: Tied to duration of GHL

Lastly, there has been a groundswell of interest in developing IFQ's for the guided sport sector. We encourage the Council to look into this tool and to include balanced input from the guided sport sector in helping to investigate this approach.

Thank you,



Tom Ohaus
President, Sitka Charter Boat Owners Association

CC:
Governor Tony Knowles
Secretary of Commerce William M. Daley
Senator Ted Stevens
Representative Don Young
Senator Frank Murkowski
Director of Fisheries, NOAA, Penny Dalton
Commissioner, ADFG, Frank Rue

January 20, 2000

To: North Pacific Fisheries Management Council Members

I am writing to provide my opinion of the GHL for Alaska's guided halibut sport fishery, and for consideration of a reduction in the daily bag limit for all sport anglers, as well as possible development of annual bag limits for individual anglers.

I am a resident of Ninilchik, Alaska and operate a Bed & Breakfast business here. I am a 28 year Alaskan, also a life member of the Alaska Sport Fishing Association and I strongly support the views of our local Deep Creek Charterboat Association.

I, too, support conservative management of the halibut resource, with fair and reasonable access to this resource for all users. I cannot support adoption of a GHL for the guided halibut fishery until the commercial fishery takes more responsibility for the loss of the resource from bycatch and waste. We must recognize at this time that the gross annual harvest levels of the guided and unguided sport fisheries are insignificant when compared to what's happening in the commercial fishery. I would like to use an analogy to explain my perspective.


A person has suffered an injury to his leg that is life threatening. It becomes apparent to his doctors that in order to save him they will have to cut off his leg. The problem is that his doctor, wanting to save his life, but not wanting him to lose his leg, begins treatment by cutting off his fingers.

A reduction in the daily bag limit for all sport anglers would end the halibut sport fishery, as we know it. No one can afford to be limited to one fish per day. Do you want to promote and regulate a catch and release halibut fishery? Reducing the limit to one fish per day would challenge the ethics of everyone fishing to put food in the freezer, that is, the greatest majority of halibut fishermen.

The development of annual bag limits for individual anglers would reach the entire sport fishery and does not upset the fundamental economics of fishing for halibut, whether guided, or unguided. If this type of management is currently working for the king salmon fishery in Cook Inlet (5 fish per season) it should work for halibut as well. How much halibut should we be allowed to put in the freezer each year? Admittedly, there is a lot of freezer burned halibut in this country every year. Seriously, though, do you think that reducing the annual waste of the sport fishery will contribute significantly toward conservation of the resource?

Fish in the freezer, for the sport fisherman, is not like money in the bank, for the commercial fisherman. Once again, responsible conservation management of the halibut resource must begin with accountability for the loss and waste of the resource prior to consideration of a reduction in catch, or restriction of access by any user other than the commercial fishery.

Sincerely,



Mike Schuster

PO Box 39647

Ninilchik, Alaska 99639

RECEIVED

JAN 31 2000

N.P.F.M.C.

January 17, 2000

North Pacific Fisheries Management Council
Attn: Richard Lauber, Chairman
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dear Mr. Lauber,

I've been an Alaskan for many years. As a provider for my family and a recreational fisherman, I find it ridiculous that our halibut limits would be cut.

I don't think I'll be going out on a Charter for just one halibut and I know others that feel the same way. This proposal is not only harming the private sector, but the Charter businesses, as well.

There needs to be more research done on this matter and representation of the non-commercial side of this story.

Sincerely,

Greg Hadner

NO RETURN ADDRESS

RECEIVED

JAN 31 2000

N.P.F.M.C

January 17, 2000

N. Pacific Fisheries Council
605 W 4th Ave.
Anchorage, Ak 99501

To Whom It May Concern, regarding Halibut limits:

A lot of people who live in Alaska depend on fish and game to stock their freezers. This is a part of our livelihood. It's not right to class us along with commercial fisherman. I hope someone is representing the rights of private citizens. I disagree with lowering the halibut limit. It's not worth it to go out for one fish.

Pete Johnson

No Return ADDRESS

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JAN 31 2000

N.P.F.M.C

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JAN 31 2000

January 25, 2000

N.P.F.M.C

Ladies and Gentlemen of the North Pacific Fisheries Management Council:

I've fished halibut commercially since 1975, first crewing, then from a 16-foot open skiff and finally purchasing a 41-foot boat in 1980 and fishing her ever since. I only fish in areas 2C and 3A.

My biggest concern regarding this allocation of the halibut quota to the guided sport industry is that the amount you propose will not be enough to please the charter industry lobbyists in Washington, D.C., and they will not allow the secretary of commerce to sign your recommendation.

I remember when you took this issue up in 1995.—Since that time, the number of charter operators and their catch are up and I fear for my future in the commercial halibut fishery in areas 2C and 3A.

Please stop the growth in these areas and give them enough to pass the approval of their lobbyists.

Thank you for your time in this urgent matter.

Walter Pasternak

Walter C. Pasternak
F/V Lory
Box 830
Sitka, AK 99835

RECEIVED

JAN 31 2000

N.P.F.M.C

January 25, 2000

Members of the North Pacific Fisheries Management Council:

My first experience fishing commercially for halibut was handlining in 1977. My husband and I purchased a bigger boat in 1980 and he began longlining that winter. I joined him longlining in 1985 and have done so every year since. I also own quota shares for areas 2C and 3A, purchased in 1997. As a boat owner, fisherman and quota share owner, with no other means of income, I have a vested interest in the health of the entire halibut fishery coastwide.

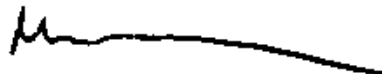
I am concerned with your proposed allocations of the halibut quota for Alaska, specifically the large amounts being set aside for the guided sport fishery. There are several things wrong with the guided sport fishery to begin with: the fishermen are allowed to take any size fish they wish; the bag limit is two per day, unlimited number of days retained; the guides and their employees are allowed to fish for and retain halibut when they are on a charter with clients; they can fish anywhere they want with no restrictions.

Your proposal is to give the guided charter fleet 125% of their 1998 catch, a preposterous amount. Why should anyone in any endeavor ever get more than they have ever attained in their history? The purpose of these regulations is to maintain the stocks, not deplete them, is it not?

It would seem a better plan to limit the number of charter positions available, similar to the limited-entry quota program instated for the commercial fleet and stop the rampant growth of this industry that is not deemed commercial even though many people are making large profits from it.

Thank you for your time in considering my thoughts on this matter that is very important to all the people of Alaska, not just those directly involved in the fishery.

Megan Pasternak
F/V Lory
Box 830
Sitka, AK 99835



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

RECEIVED

JAN 31 2000

N.P.F.M.C

I have only a small halibut quota in southeast Alaska, but the money I make by fishing it each year is important to me. I want to urge you to vote against the charter industries proposal to have allocated to them a fixed or stair stepped percentage of the halibut quota.

I think your 1997 plan of 125% of the 1995 Charter catch is plenty for them and if they think they need more, they can buy quota like I did.

Also, I want to add my opinion on the State of Alaska's ill-advised decision to side with the Charter industry. To me, this "venture" into allocation issues marks a low point in an otherwise equitable and cooperative management program.

Thank you,
Elizabeth A Caffrey
Mount Vernon, WA 98274



Copy: Governor Knowles

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

RECEIVED

JAN 31 2000

N.P.F.M.C

Dear Council:

I am and have been a small boat halibut fisherman in southeast Alaska for some 21 seasons. I depend on the halibut resource for the vast majority of my yearly income.

I am writing to urge you to stick to the Charter halibut allocation plan you decided on in 1997, more specifically, 125% of the 1995 charter industry harvest. Abundance-based management is really the only approach that makes sense biologically, and an allocation of halibut that rises and falls along with the health of the resource is the only fair way to divide the quota.

I have to say that it is almost unbelievable to me that the State of Alaska is choosing to take sides in an allocation issue. In my mind this seriously undermines the State's credibility. What about the millions of dollars worth of boat and IFQ loans that the State of Alaska's Department has out there? Or the loans that CFAB, NBA, and many others have made? I know that the commercial halibut fishery provides significant economic benefit to every single town in southeast Alaska. Prices of goods and services remain stable, no matter what the price of fish happens to be.

Again, I urge you to stick with your 1997 decision to keep the charter allocation at 125% of the 1995 harvest. If the charter fleet wants more halibut, they can buy some, like many of us had to do.

Thank you,
John W. Skeele
F/V Nora
Port Alexander, AK



Copy: Governor Knowles

Ken Eichner ~ F/V Emily Nicole

5166 SHORELINE DRIVE N. • KETCHIKAN, AK 99901 • (907) 225-4517 • FAX: (907) 247-4516

January 13, 2000

RECEIVED

JAN 31 2000

N.P.F.M.C.

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

Dear Chairman Lauber:

This letter is to request that the Council:

1. Oppose a fixed halibut poundage allocation for the halibut charter fleet. Any allocation has to be fixed to the T.A.C.
2. Adopt 125% of the 1995 charter fleet catch as the charter fleet's percentage of halibut allocation.

Regarding number 1 above, I think it is irresponsible to let the IFQ holders take all of the quota cuts while the charter quota stays the same. If the charter fleet is truly concerned about halibut as we are, they will have to understand that the biomass fluctuates and at times will have lower bag limits. They claim they are sport fishermen; it is not an uncommon thing while sport fishing to practice catch and release. I think there are many options for the charter industry to adjust their catch to stay within a quota that is a percentage of the total allowable halibut catch.

- a. Practice catch and release
- b. Charter boat limited entry
- c. Purchase quota shares

Charter clients don't need to fill their freezers AND their neighbor's freezers. It is my job to supply restaurants and grocery stores with halibut to purchase. One attitude of some charter operators is, 'If our clients don't take enough fish home to pay for their charter, lodging and airfare they won't come to Alaska.' I wish when I come back from my vacation I had more to show for it than a tan and sand in my shorts. A vacation is not supposed to pay for itself.

Regarding number 2 above, before original quota shares were issued a deduction for CDQs was allowed. I questioned this and one comment I heard from the NPFMC staff was, 'We are taking this deduction and we don't feel we are doing anyone any injustice because people receiving quota share are receiving a windfall; so we don't mind taking a little of their quota.'

Honorable Rick Lauber, Chairman
Page 2
January 13, 2000

Now things are much different. People like me have purchased quota share; in fact, millions of dollars have changed hands. The NPFMC supported the IFQ system. People have purchased quota. I wasn't supportive of IFQs but I chose to purchase IFQs so I could continue longlining. THE NPFMC owes it to me to protect the IFQ system they created from other enterprisers that will unduly dilute the quota share pool.

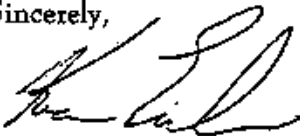
If it is the will of the Council to reallocate the halibut resource, and let the charter fleet take over the halibut quota at least have the decency to let me fish unmolested for another ten years to pay back my investment. It really upsets me that only five years ago the Council radified IFQs. Now it is considering giving it to another group.

This year, we may take the 26% out in 3A. It is going to hurt but I'm not going to complain if that's what the best science says the quota should be. But I AM going to be VERY upset if the quota drops 26% for me and stays at 125% of 1998 charter catch for the charter fleet!

I depend on longlining for 50% of my family's living. I have invested \$526,000 in halibut quota. Please do the right thing and set the charter quota at 125% of the 1995 catch. Let that quota fluctuate with the total allowable catch. No funny formulas ~ just a plain and simple percentage.

In closing, please remember that the charter fleet has other options to stay within a quota. They are experiencing uncontrolled growth. Please do not let their growing pains and the unwillingness of the State and Federal Governments to control their growth spill over onto the IFQ holders.

Sincerely,



Ken Eichner

NPFMC:lr

COPY: GOVERNOR KNOWLES

F/V Emily Nicole

January 13, 2000

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

RECEIVED

JAN 31 2000

N.P.F.M.C

Dear Chairman Lauber:

I am a crew member on a longliner. I've spent \$85,000 on halibut quota. The halibut fishery is VERY important to my family.

Being involved in the commercial halibut fishery I understand that the quota has to fluctuate with the halibut abundance. Therefore, I am adamantly opposed to a fixed or stair-stepped allocation for the charter fleet.

Why should the charter operators not be responsible for the halibut stocks? Under a fixed or stair-stepped charter allocation, IFQ holders not only take cuts from a lower TAC but must also take more cuts because the charter fleet doesn't want to be good stewards of the resource. It troubles me that ADFG has proposed a fixed or stair-stepped charter allocation. This proposal is counter to Alaska's management principles.

In closing:

1. Please **OPPOSE** a fixed or stair-stepped allocation for the charter fleet.
2. Please **ADOPT** 125% of the 1995 charter catch as their percentage of the TAC.

Thank you in advance for your consideration.

Sincerely,



Dan Eichner

Copy: Governor Knowles

January 24, 2000

Honorable Rick Lauber
NPFMC
605 West 4th Avenue, Ste.306
Anchorage, AK 99501
Fax(907) 271-2817

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JAN 31 2000

N.P.F.M.C

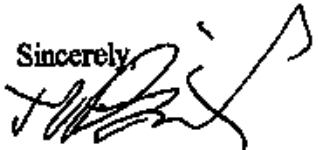
Dear Chairman Lauber,

I am writing to support an allocation of halibut to the charter fleet based on abundance and historic levels. The chartered halibut fleet should not be allowed to expand at the expense of the commercial halibut fishery. The council should base the halibut charter fleet's allocation at 125% of their 1995 harvest.

I am a halibut longline crewman. I depend on the commercial halibut fishery for over 50% of my annual income. I am using my earnings from fishing to support myself and pay for my college education. This issue obviously is a direct threat to me. I have been fishing with my dad since I was 12 years old. It seems very unfair to take away my ability to make a living, to allow the charter fleet unrestricted access to the halibut resource.

The charter allocation should be set at 125% of the 1995 harvest.

Sincerely,



Joe Daniels
F/V Indigo
630 SE Yamhill #107
Portland, OR. 97214

cc: Governor Tony Knowles

P.O. Box 788
Valdez, Alaska 99686
907-835-4404
907-835-5572 fax

Patrick A. Day

January 18, 2000

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JAN 31 2000

N.P.F.M.C

Governor Tony Knowles
Office of the Governor
P.O. Box 110001
Juneau, Alaska 99811-0001

Dear Governor Knowles:

I am writing to solicit your concern and support in a process that will affect all Halibut fishing in Alaskan waters.

I am a fifty year old native Alaskan (Caucasian), and a third generation commercial halibut fisherman. My family has lived in Valdez since 1930 through five generations. We have always commercial fished or processed fish in Valdez and Prince William Sound. At this time my two sons fish with me and my five grandchildren. My dad 88 years old keeps making it out each year thinking it will be his last trip on his own boat. Although halibut fishing has not been our main income, it has always contributed to the boat upkeep, insurance, etc.

Because of the oil spill and conditions in Valdez I did not, fish in 89, 90, and 91, I did not receive any IFQ. I wanted to see if the program was going to work well and if the large investment necessary to buy quota share was a good investment. I was getting older, my boys were getting older so last year I borrowed \$120,000 so that we might fish together before we lost the opportunity. I borrowed the money through the NMFC program for small operations.

My concern is that at the time the IFQ program was started for commercial fisherman there was not a comparable program for charter boats and other users. With out a program in place that allocates a percentage of the total allowable catch to each group, each time other users increase their use it comes out of the commercial catch quota. The faith I had in the system and the value of my investment in the system continues to diminish as each new user comes forward.

I am sure that you are aware that the NMFS and the Alaska Department of Fish and Game have been working this problem for several years without a solution. They plan to make a decision on how to proceed at the NMFS February meeting in Anchorage.

It appears to me that the Department of Fish and Games Sports Fish Division has taken a position that would give charter users an allocation of halibut with out regards to the yearly TAC. As the TAC is the basis that the State has used to manage all of its fisheries; it surprises me and upsets me that the State has taken this position. Not using abundance based management the same for all users is poor public policy, is unfair, and undermines the State's credibility. Abundance based management has been the cornerstone of a successful management program and it is not wise to abandon it.

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



January 18, 2000

Page 2

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

The charter allocation should be set at 125 percent of the 1995 sports harvest as originally set forth by NMFS in 1997. This was a generous compromise by the council in 1997 that allowed reasonable growth.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs and contributes to the economy of my community. Please help us to build a fair system that provides stability and does not undermine our faith and the large investments we have made.

Sincerely,

A handwritten signature in black ink, enclosed in an oval. The signature is cursive and appears to read "Patrick A. Day".

Patrick A. Day

Copy: Chairman Lauber

Michael & Valerie Nelson Phone # 907-883-3932
 P.O. Box 375
 Tok, AK 99780

To whom this concerns,
 You folks should leave the sport, charter, & subsistence halibut limit at two per day. The reasons we feel this way are,

1. Sport, subsistence, & charter only are allowed three percent of the take each year. Most of us subsistence people have to hire charter boats, we can't afford ocean going boats!

2. My wife & I are raising five children on \$20,000 - \$30,000 per year, cutting the limit by a fish per day takes food from our table, as we can only afford one to two charters a year for two of us.

3. If you want to conserve fish, you should change some laws regarding bycatch. Bycatch halibut should be considered in the quota system, the commercial fishing industry wastes tons of it! We are not blaming all commercial fishermen, as certain laws cause the waste.

4. There should not be any dragging of the ocean floor!

-Michael & Valerie Nelson

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FEB -1 2000

N.P.F.M.C

Donald R. Lane
F/V Predator
PO Box 2921
Homer, AK 99603

Honorable Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK 99501-2252
Fax (907) 271-2817

Mr. Lauber,

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

My family and I depend on the commercial halibut fishery for 50% of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We rely heavily on the IFQ program because of the stability promised by the government. Reducing the commercial harvest will reduce the value of IFQ and continue to reduce the value of my boat. It may also impair the ability of my wife and I to repay our boat loan.

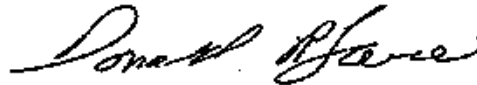
All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International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

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

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

Sincerely,

Donald R. Lane, F/V Predator



Copy. Governor Tony Knowles, State of Alaska, PO Box 110001, Juneau, AK

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N.P.F.M.C



North Pacific Fisheries Association, Inc.

HEADQUARTERS:

BOX 796 - HOMER, ALASKA 99603

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

1/30/00

Mr. Rick Lauber

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

We support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation. My group of fisherman, and my community have survived a gut-wrenching adjustment to the current IFQ halibut management system. We have lost our shellfish fisheries here in Kachemak Bay. Most fisherman are hard pressed to find a stable fishery to count on to make those boat payments to the Alaska State Division of Investments. Halibut is one of the few fisheries the coastal commercial fisherman can count on. Many fisherman have went the extra step and borrowed to purchase more IFQ, to build their business. Many may not financially survive declining resource years if more of the commercial halibut share continues to be given to the charter fleets as presently managed.

NPFA supports the percentage share (125%) of the 1995 catch. We think that was a generous amount of fish for the halibut charter industry. All those who rely on a sustainable resource for a living understand the need for abundance based fishery management and accept the risks involved with fluctuations in harvest. Commercial fishermen have been responsible stewards of the halibut fishery and have fished under rules adopted by the International Pacific Halibut Commission since 1923. Delinking the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the

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State's credibility. Abundance based management has been a corner stone of a successful management program and it is not wise to abandon it.

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth. We urge the North Pacific Fisheries Management Council to support the 1995 catch levels, with abundance based management for all user groups.



Donald R. Lane
President

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

HALIBUT ASSOCIATION**OF NORTH AMERICA**

P.O. BOX 20717
SEATTLE, WASHINGTON 98102
PHONE: 206-325-3413
FAX: 206-324-7590

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FEB - 1 2000

February 1, 2000

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Icicle Seafoods, Inc.

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North Pacific Processors, Inc.
Sitka Sound Seafoods, Inc.
Wards Cove Packing Co.

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WASHINGTON
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Bentley Seafoods, Inc.
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Northern Products Corp.
Trident Seafoods Corp.
UnSea, Inc.

N.P.F.M.C

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

VIA FAX (907) 271-2817

RE: HALIBUT GHL

Dear Mr. Lauber:

The Halibut Association of North America is a trade association of companies in Alaska, British Columbia and Washington that buy and process halibut. Our members purchase over half of Alaska's halibut quota annually.

We have consistently supported a guideline harvest level for the charter industry since the issue was introduced seven years ago and we continue to do so now. We urge you and the other members of the NPFMC to once again approve a GHL. We believe the time is long overdue for the commercial charter industry to share the same good stewardship of the resource that the harvesting and processing sectors have exercised these past seventy-seven years when, over and over again, they have adjusted to changes as needed to maintain a viable fishery. Please do not delay this important proposal any longer.

An abundance-based system for allocating fish to commercial sectors is a fundamental principal of good resource management. The charter halibut fleet is an enterprise viewed by the U.S. Coast Guard and paying customers as commercial, and as such should be held to the same standard as other commercial users.

An abundance-based upper bound on charter growth, a GHL set at 125% of the 1995 charter harvest, would allow room for expansion. The charter industry could then, if it was so inclined, continue to work with the Council or through LAMPs to establish a moratorium, an IFQ program or other means to rationalize its industry. The charter industry has resisted consideration of those alternatives for seven years and to suggest them now is counterproductive.

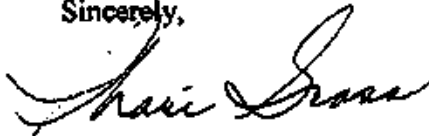
We believe that a simple system that is enforceable, easily understood by all, and provides the charter industry with a guaranteed season is the best way to proceed on this matter. We recommend, therefore, that the Council pass the GHL, as it did in 1997, at 125% of the charter fleet's 1995 harvest, but this time with bag limits included in the equation as the management tool for the National Marine Fisheries Service to use in years subsequent to when the level is reached.

We do not believe that a system premised on in-season closures is viable. Firstly, we understand and appreciate the marketing and booking realities of the charter industry and, secondly, we can easily envision difficulties that the resource managers would face in securing reliable on-time data and the analysis they would then require to manage in-season closures.

In summary, we urge you to move forward at the February Council meeting and pass a GHL for the charter fleet that is abundance-based, and similar to that passed in 1997, except for the addition of giving managers the tool of bag limits when the level has been reached.

Thank you for your attention.

Sincerely,



Shari Gross
Director

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FEB - 1 2000

N.P.F.M.C

file: Sportfish & Charter Issues

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FEB - 1 2000

N.P.F.M.C



131 Front Street
Ketchikan, Alaska 99901
Phone: (907) 225-6166
Fax: (907) 225-4250
E-mail: kvb@ktm.net
www.visit-ketchikan.com

January 31, 2000

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

VIA FAX TO: 907-271-2817

Dear Members of the NPFMC,

Please accept the following comments in opposition to the NPFMC's consideration of placing a cap on Alaska's guided halibut sportfishery.

The Ketchikan Visitors Bureau represents 212 businesses from our community and outlying areas such as Prince of Wales Island. Over 40 businesses are engaged in providing fishing opportunities for their guests- from charter operators and boat rental companies to lodges, resorts, hotels and bed and breakfast enterprises.

As in many parts of Alaska, sportfishing enthusiasts are a primary market for our efforts to bring visitors to our area. The tourism dollars generated within our community through the guided sportfishery are vital to our economic well being. Further, the industry generates millions of dollars worth of newspaper, magazine and television coverage annually- a public relations tool that adds to the allure of Alaskan seafood products. We feel that it is extremely important for the council to acknowledge the importance of guided sportfishing to Alaska and individual communities and to insure that the NPFMC rules on issues in a manner that truly benefits our fishery resources.

Our membership is opposed to the halibut cap, and several of their comments are presented below for your consideration:

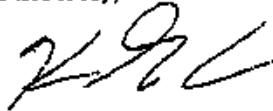
- Halibut IFQs for commercial fisheries have been raised in the past year, making it difficult to understand the rationale for limiting guided sport caught fish.
- Pound for pound, sport caught halibut provides substantial economic benefit and turnover of the dollar through expenditures made by the charter customer.



- Halibut catch amounts within the sportfish fleet aren't the reason that the resource is depleted. The catch isn't significant enough to impact the fishery when compared to commercial harvest levels.

A number of our members have fished commercially in the past and all have an appreciation for the need to manage our fishing resources wisely. The Ketchikan Visitors Bureau feels that this action will ultimately have little impact on the conservation of the species. Thank you for the opportunity to comment on this issue.

Sincerely,



Kris Geldaker, Chairman
Ketchikan Visitors Bureau
Board of Directors

CC: KVB membership
and attached list

Steve Vaneck ²¹⁵
 P.O. Box 103
 Ninilchik, AK. 99639

Richard Lauber, Chairman
 NPFMC
 Anchorage, AK, 99501-2252

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 FEB -1 2000

NPFMC

Dear Mr. Lauber,

Re: Halibut GHL

as a longliner faced with a reduction in 3A, I support the original GHL based on the filed percentage existing in 1995.

There can be ~~the~~ up to 10% roll over back to the charter industry for the following year when the GHL isn't reached the same as it is for the longliners.

I support a moratorium and an IFQ program for charter boats that could be developed in the near future. Otherwise we will all be back year after year fighting the same fight.

Charter businesses that advertise with pictures of their catches and the promise of trip limits are truly selling fish, ~~and~~ not selling a toxic service.

Thank you,

Steve Vaneck

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

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N.P.F.M.C

GHL for Charter Fleet Comments

I am in support of granting the charter fleet a PERCENTAGE ALLOCATION based on their historical catch and abundance. Furthermore I am in favor of some sort of limited entry into the charter boat fishery to protect the historical charter boat fishermen from getting inundated by newcomers to the fishery.

I am a Commercial Halibut Fisherman and I rely on much of my family income from Halibut. That is why I am in favor of only an abundance dependant (percentage) allocation. It must be our first priority to protect the resource and in that vein all user groups need to share in the conservation of the resource.

The NPFMC should hold to the percentages that were made in 1997. The compromise that came up with these percentages allowed for reasonable growth.

It is important to note that the charter boat fleet is not going to have to pay a penny to obtain this allocation, but since I wasn't issued IFQ I have had to buy all of the Halibut that I have.

Sincerely,

Scott Stevenson

Scott Stevenson
Vice President
Bristol Bay Driftnetters' Association

Mr Richard Lauber
Chairman, NPFMC
605 W Fourth Avenue, #306
Anchorage, AK 99501

Carol L. VanDeursen
113 Nanook Circle
Anchorage, AK 99504

January 20th, 2000

Dear Mr Lauber,

The North Pacific Fishery Management Council will soon vote on a measure that will change the daily limit of halibut sport-fisherman utilizing charter services in Alaska from two to one fish. Cutting the bag limit in half will cause the fisherman to target larger fish in order to realize better value for the money spent chartering a boat. As you know, the larger halibut are always females. Targeting the females will only further help in the depletion of the species.

I am opposed to this measure and urge you to vote negatively on the matter. The halibut are a public resource that are here for the benefit of all Alaskans.

Sincerely,



Carol L. VanDeursen

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FEB - 1 2000

N.P.F.M.C

7330 Silver Birch Drive
Anchorage, Alaska 99502

1-29-00

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

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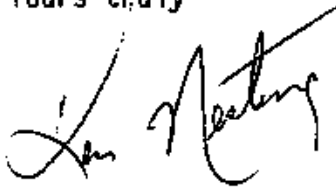
N.P.F.M.C

Gentlemen,

My wife and I fish every year for halibut to stock our freezer. Like most Alaskans, we utilize charter boats to access these fish. We can only afford one fishing excursion a year, and the 4 halibut this gets us, usually 15 to 30 pound chickens, is about right to last us the year.

By limiting my catch to one fish per trip, you guys will cut my supply in half, and part of my grocery money, instead of going to some hard-working ALASKAN charter-boat operator, will go to some coon-ass Louisiana cat-fish grower. At present, if you limit catches to one fish per trip, I wouldn't feel justified to put out the money to go out. It now costs about the same to catch my own halibut as to buy it at Carrs or Safeway. The prevailing factor is the pleasure of a fishing trip. If pressure from commercial fishermen persuades you your council to deprive me of that pleasure, then damned if I will buy any commercial-caught halibut, or any fish, for that matter, ever again.

Yours truly



Ken Nesting

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

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FEB - 1 2000
N.P.F.M.C

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

RE: Sub-area K designation for the regulation of the Kodiak halibut sport/charter fleet.

Chairman Lauber and Council members;

The Kodiak Association of Charterboat Operators (KACO) believes that preliminary steps need to be taken to insure that all residents of Alaska be treated in a fair manner when it comes to apportioning resources. The current management areas for halibut as established by the International Pacific Halibut Commission (IPHC) while useful for general biomass evaluation and commercial fishing regulation, were not created for, nor are they useful for the regulation of sport/charter caught halibut. KACO believes that ONE Sub-area K for 3A needs to be established by the council so that Kodiak is not subsequently included in with Lower Cook Inlet when considering guideline harvest levels (GHL).

Specifically, KACO believes that Kodiak must be set aside as one separate management subarea when considering the controls that may need to be implemented in regard to the growing Lower Cook Inlet sport and charter halibut fishery. The 1999 season shows the 261 active logbooks from Lower Cook Inlet took out 40,510 client fishermen. In Kodiak, the charter fleet consists of 74 logbooks taking 10,470 client fishermen. We do not expect the kind of growth experienced in Lower Cook Inlet since the costs of traveling to Kodiak from population centers are currently acting as a restriction to sport and charterboat growth. Though there has been some growth in the Kodiak charter fleet, associated growth in charter clients has lagged. In Kodiak, there is no shortage of halibut. If the entire Kodiak area is to be lumped with the Lower Cook Inlet in terms of GHL restrictions, or as part of a moratorium on new entrants to the halibut charter business, economic hardship will result.

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

We are suggesting the need to see Kodiak as a separate entity from the Lower Cook Inlet and much of the rest of Area 3A. The use of a Sub-area K designation fits admirably the needs of Kodiak's charter fleet.

Likewise, the Kodiak commercial fishing interests which may have differences with the charterboat industry, can see that cutting Kodiak Island loose from the rest of Area 3A makes good sense. Kodiak's large continental shelf east of town is not fished by the other communities' charter fleets, only Kodiak's. Such a healthy biomass should not be linked to the pressures put upon fish caught in the Lower Cook Inlet

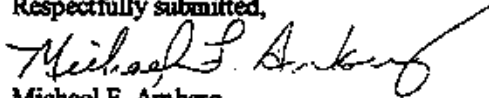
Representing Kodiak's Professional Charterboat Operators

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

by its large sport/charter fleet. To this point the Kodiak Fish and Game Advisory Committee adopted and unanimously passed proposal # 425 that recommended splitting Sub-area K from Area 3A to the State Board of Fish.

The idea of splitting Sub-area K from Area 3A is one that fits need, accuracy, usefulness, and sense in regulating the sport/charterboat halibut take in the larger Area 3A.

Respectfully submitted,



Michael F. Amberg
President, Kodiak Association of Charterboat Operators

Representing Kodiak's Professional Charterboat Operators

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FEB - 1 2000.

N.P.F.M.C

Rion T. Vanek
P.O. Box 251
Ninilchik, AK 99639

January 29, 2000

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

Dear Chairman Lauber,

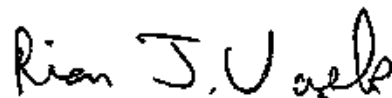
I would like to urge the Council to give the charter fleet a fixed percentage of the halibut quota that is based on abundance. To do otherwise (such as guaranteed poundage allocations, or allowing unchecked growth) would be very detrimental to the commercial fishing sector, including to myself.

In times of decreasing halibut abundance (such as now) a fixed poundage allocation for the charter fleet would force the commercial fleet to bear the burden of conservation for not only their portion of the resource, but also would have to shoulder the conservation burden not borne by the charter fleet. In other words, the commercial fleet would get a double reduction in quota when stocks decline.

As a commercial fisherman dependent upon quota size for my livelihood (and my ability to make payments on my IFQ's), I find it very repulsive to think I may have to bear part of the conservation burden for the charter fleet. The charter fleet must have a quota (GHL) that is directly tied to stock abundance.

Thank you for considering my comments in your decisions on this very important matter.

Sincerely,



Rion T. Vanek

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FEB - 1 2000
N.P.F.M.C

February 1, 2000

To: North Pacific Council Chairman and Members

Please take no action on the proposal for a split in the GUA pacific cod TAC between gear types at this time.

This fishery has been managed under one TAC for all gear types to equally compete. If changed there are many issues which need to be addressed. This fleet is not completely defined by gear type. There has been a lot of cross over between gear types in recent years. Some vessels using more than one gear type in a single year.

The LLP permits which we are operating under this year have no species requirements. With so many non-drawl permits that have no history in this fishery. It could unfairly impact historical participants of the fixed gear sector.

As a fishery largely made up of vessels home ported in our community. We have all worked together very well with respect for each other, with little conflict. To have a gear split in the quota, would drive a wedge through our community and the different gear segments of it.

In the review of this proposal, questions should be raised as to what is really going on in this fishery. This fishery needs, at the very least, thirty percent observer coverage specific to this species per quarter. The 3A halibut quota is being reduced, why is the amount allowed for bycatch in this fishery not being reduced?

We all feel the growing pressure on this fishery. This proposal is not a solution to this. Recently there has been talk in our community about some type of management system based on individual catch history. This seems like more of a direction to protect all the participants of this fishery. And would naturally divide the TAC based on each qualified individuals gear type.

Thank you,



Matt Hegge

January 27, 2000

Randy Huber
5341 Lionheart Dr.
Anchorage, AK 99507

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FEB - 1 2000
N.P.F.M.C

Mr. Richard Lauber, Chairman
NPFMC
605 W. 45th Ave., Suite 306
Anchorage, AK 99501-2252

Mr. Lauber,

As you know, the North Pacific Fisheries Management Council will be making decisions on restricting halibut sport fish charters.

A number of concerned sportfishermen and charter operators have cooperated in writing a petition which expresses our interest in a status quo vote at this time.

The text of our petition is as follows:

Petition Representing the Interest of Halibut Sportfishermen In Alaska

During its meeting beginning February 7th in Anchorage, the North Pacific Fisheries Management Council (NPFMC) will be making it's final decisions on whether or not to place a harvest guideline lever on the guided halibut sport fishery. We the undersigned feel that the development of any new restrictions on sport fisherman or sport fish charters at this time would be inconsistent with the council's responsibility of ensuring fair allocation of a public resource.

We encourage the council to vote option 1: STATUS QUO.

We support our position with a number of factual points.

1. Guided sport fisherman harvest from about 4.7 to 6.2 million pounds while the commercial fishery takes about 62 million pounds and commercial bycatch amounts to about 12 to 14 million pounds. Any significant restriction to reduce the harvest of the anglers that use charters would cause excessive hardship to the charter and related industries with little advantage to the commercial fleet.
2. Since 1975 commercial harvest levels have increased proportionately to increasing halibut abundance, while the sport harvest has remained static at 2 fish/angler/day.
3. Unlike the commercial fleet, the sport fish fleet is regulated by factors including limited fishing time per trip, adverse weather and tidal conditions, and limited access to the resource.
4. The guided halibut fishing fleet is limited by the availability of sportfishing customers. Guided anglers use charters to access halibut with the expectation of harvest. That harvest is not guaranteed. However, if that expectation is not there, the customer is not interested in purchasing the charter.
5. The effect of restrictions on the harvest of halibut will cause additional pressure on "ripple" fisheries. Both state and federal management will require extensive reconsideration based on changes in fishing effort.

6. Finally, the NPFMC lacks adequate representation in voting seats from the sport fishery or the sport fish industry. The NPFMC is also the only council in the United States with such unbalanced representation from either sport or guided sport fishing interests.

We also believe that the majority of the sport fishing public would look forward to participating in a comprehensive management plan which would provide adequate representation from all of the resource's user groups. Additionally, we feel that sport fishermen would not oppose harvest restrictions during times of low halibut abundance if they are applied consistently throughout the guided and unguided fisheries. Although, we believe that during times of low abundance the sport harvest would likely decline proportionately due to limited access to the resource, resolving the need for further restrictions. Localized depletion issues should be addressed locally via Local Area Management Plans (LAMPS).

Thank you for your time and consideration.

In just 17 days we have collected over 1300 signatures from concerned Alaskans in support of our views.

Please take our views into consideration when the council makes it's final decision.

Thank you for your time and consideration.

Sincerely,
concerned Alaskan sportfishermen



January 28, 2000

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

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FEB - 1 2000
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Dear Mr. Lauber:

On behalf of the nearly 500 members of the American Sportfishing Association (ASA), I wish to express my frustration with the harvest guideline levels (GHL) for Alaskan halibut recently proposed by the North Pacific Fisheries Management Council.

ASA is a non-profit trade association whose members include fishing tackle manufacturers, boat builders, state fish and wildlife agencies, angler organizations, sport fishing retailers, and the outdoor media. For over 50 years, ASA and its predecessor organizations have promoted the conservation of fisheries resources and environmental measures that improve the aquatic environment in order to ensure the enjoyment of healthy fisheries by America's more than 50 million anglers.

There are certain fundamental differences between recreational and commercial fishermen that often go largely unrecognized. These include, but are not limited to, the fact that: (1) catch efficiency is not the goal of the recreational angler and indeed efficiency is sacrificed for selectivity, and (2) recreational fishermen and manufacturers contribute directly to the preservation and restoration of fisheries and their habitat through the payment of excise taxes and license sales. Unfortunately, I can now add to that list the fact that recreational anglers must forgo some of their fishing opportunity by accepting tighter restrictions than their commercial counterparts.

Recreational anglers have made it clear that they will do what it takes to help rebuild a fishery in the form of quotas, bag limits, or minimum sizes. Now, allocations of the quota are made during a good year and the recreational sector is not being recognized for their contribution. We cannot abide by such inequitable treatment of recreational fisherman.

These GHL allocations represent a continuing trend of great gains for the commercial industry. The scientific indications point to a relatively healthy stock. However, it appears that the Alaskan halibut allocations are based more on the economics of a select group, rather than scientific justification of what is best for the fishery.

AMERICAN SPORTFISHING ASSOCIATION

1033 NORTH FAIRFAX STREET, SUITE 200, ALEXANDRIA, VA 22314 • 703-519-9691 • FAX: 703-519-1872
WEB: WWW.ASAFISHING.ORG • E-MAIL: INFO@ASAFISHING.ORG

ASA would like to see an allocation process that formally considers the input of user groups and strives for an equitable apportionment of the fishing quota that is based on the traditional uses of the fishery stock. Specifically, we encourage the Council to consider the guided and non-guided sport fisheries as one, so as to not administratively weaken the voice of the recreational sector.

I appreciate your attention to this important matter.

Sincerely,

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

Mike Hayden
President, CEO

cc: Mike Bethers

Brent M. Western & Tony B. Western
813 West 80th Ave.
Anchorage, AK 99518

January 31, 2000

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

RE: APPROVE THE HALIBUT CHARTER GHL

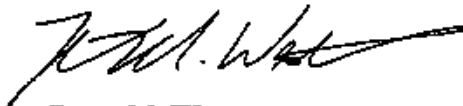
Dear Chairman Lauber,

I am writing to urge you, and the other council members, to approve the original guideline harvest level (GHL) that was set for halibut charter boats by the Council in 1997. Additionally, allocation needs to be tied directly to abundance. The "stair step" proposal offered by Deputy Commissioner Benton is unfair and is contrary to Alaska's stated goal of using "abundance based management" for resource management decisions.

My family has been fishing Alaska's waters since the 1960s, and we depend on the commercial halibut fishery for a significant part of our annual income. We have mortgaged our lives and monetary resources to commercial fishing. We need stability within the industry for a hope of tomorrow. Implementing the GHL is an essential component in providing stable and sustainable industries—long line and charter businesses. The urgency of the GHL decision is intensified by the drastic reduction in quota for the 2000 season.

The commercial-fishing sector relies on a mix of various fisheries such as salmon, halibut, herring, and other species. If one of the key parts of this mix is taken out, it will cause a disastrous domino effect on Alaska and it's people. I like many other fishermen rely on this fishery mix, and I need to work multiple fisheries to remain economically viable. With the commercial salmon industry in the financial doldrums, we cannot survive the derailment of the commercial halibut fishery.

Sincerely,



Brent M. Western

CC: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Brent M. Western & Tony B. Western
813 West 80th Ave.
Anchorage, AK 99518

January 30, 2000

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

**RE: OPPOSITION TO GHL ISSUE 1 OPTION 4 (GHL PERCENTAGE PRIOR
TO BYCATCH AND WASTE)**

Dear Chairman Lauber,

I am opposed to the recommendation of Council member Mr. Joe Kyle that charter GHL be applied as a percentage of CEY prior to deduction for commercial bycatch and wastage. The amount of commercial bycatch and wastage is primarily a function of the trawl fishery.

The most available data for 1999 shows that for Area 3A there was approximately 2.9 million pounds of halibut bycatch mortality. Of this 2.9 million pounds, only 119,000 pounds of mortality came from the hook and line IFQ fisheries—a mere 4 percent of the total! The burden of trawl bycatch and waste should not be assessed against the commercial long line fleet.

All users of the halibut resource should have a vested interest in the reduction of bycatch and waste. Computing charter boat GHL prior to deductions for bycatch and waste would exempt the charter boat industry from the impact of bycatch/waste allocation decisions.

If the Council chooses to apply the GHL as a percent of CEY prior to deductions for commercial bycatch and waste; then the GHL percentage, as originally intended by Council (based on 1995 or 1997) needs to be adjusted downward. In other words, to retain the allocation equivalent, the allocation base "pie" is larger, so the percentage must be reduced.

If the intent of the proposal by Mr. Kyle were to increase the size of the charter GHL relative to the long line fleet, it would be more appropriate for it to be stated as a proposal to increase the GHL. Then the Council could vote to accept or reject the proposal.

Sincerely,



Brent M. Western

CC: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Brent M. Western & Jenni J. Western
813 West 80th Ave.
Anchorage, AK 99518

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February 1, 2000

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

RE: APPROVE THE HALIBUT CHARTER GHL FOR THE BENEFIT OF ALL AMERICANS

Dear Chairman Lauber:

Our family has been fishing Alaska's waters since the 1960s and we are involved in the halibut, herring, and salmon fisheries. We take great pride in providing a quality product for consumers and our small family operation is filled with the entrepreneurial spirit this country is built upon.

According to the U.S. Fish and Wildlife Services, there are 50 million American anglers' 6 years and older or 18.3 percent of America's population of 273M. Currently American angler numbers are in decline—fishing license sales are down 3 percent from 1990-96. The majority of consumers are not anglers. These consumers, angler and non-angler rely on commercial fishermen to provide seafood for their consumption. We need to protect the consumer's right to quality seafood and sustain the economic diversity of Alaska's communities by regulating the charter fishery and protecting the resource.

Any limited resource can not have or sustain an unlimited and uncontrolled number of users or extractors. The basis for charter guideline harvest levels, limited entry, daily bag limits, individual or vessel fishing quotas and other resource management tools is to manage the resource more efficiently, thus creating viable and continual economic bases and healthy, renewable resources.

The unbridled halibut charter fishery has grown exponentially over the past ten years, and has caused localized depletion of the resource and has forced charters to venture further from port to find fish; thus increasing the occurrence of conflicts with other commercial operations. If left unregulated, the charter industry will effect the health of the resource and the economic bases of coastal communities.

The small boat fleet that fish for salmon, herring, halibut, cod, and other near-coastal species has come under constant attack from the tourism sector. These smaller boats are restrained by their size to fish coastal waters. These smaller boats use very discriminate and selective gear and do not have the bycatch problems associated with other fisheries. If anything, the bycatch rates are more comparable to those using a rod and reel. While longlining for halibut, we're able to retain most, if not all our bycatch for increased utilization of the resource and release live juvenile halibut with any waste!

We have been good stewards of the resource and will continue to be, however, giving the Charter industry a fixed allocation of halibut is contradictory to Alaska's management principles of abundance based management. A fixed allocation to any group is foolish, and will only hurt the other users--non-guided sport, subsistence, consumers, and commercial fishers. All users have an obligation to be good stewards of the resource and share the responsibility in times of abundance and of decline in halibut stocks. Furthermore, it is inappropriate for ADF&G Sport Fish Division to advocate on allocative issues. ADF&G are here to provide important data to make resource-management decisions, not to make or advocate political ideals.

Alaska's economy needs a diverse economic base of industries--commercial fishing oil, tourism, and the like; but not at the expense of historically established and viable industries. Downturns in the US economy will slow tourism in Alaska, oil prices fall and prices paid to fishermen fluctuate. For long-term economic stability, Alaska needs to foster a favorable economic environment for all its industries and not put all its eggs into one or two baskets!

Sincerely,



Brent M. Western

CC: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

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FEB - 1 2000

N.P.F.M.CPO Box 3006
Post Falls, ID 83877
January 31, 2000,Rick Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste. 306
Anchorage, AK 99501-2252

Dear Chairman. Lauber,

I am writing to request serious consideration of appropriate limits on the overall harvest by halibut charter boats. I believe this is necessary to protect the resource and to provide fairness in management. Having been an Alaska resident for twenty-two years (from 1965-1987) and involved in fishing as my primary income since 1965, I have always been a supporter of good resource management, accepting limitations and restrictions as a necessary means to sustaining an industry.

I was one of those who received sablefish and halibut IFQ's. When the sablefish TAC was reduced over several years by 50 percent, I accepted these limitations and purchased additional IFQ's on the open market. This year my halibut quota share has been reduced by 25 percent in Area 3A. Again, my choice is to make a further investment in purchasing IFQ's, if I wish to maintain my production level, or to accept lesser catch levels. The resource does not stay constant; therefore, catch allocations based upon abundance make sense for both commercial longliners and for commercial charter boat operators. The adjustments, based on research findings, should apply to the both commercial user groups. Another possibility is for commercial charter boat operators to buy IFQ's on the open market, given some modifications in the existing program, as I have done.

I believe good resource management requires the participation of all user groups, and therefore, believe that the council should keep the charter allocation at 125% of the 1995 harvest. This recommendation, made in 1997, was a very generous compromise that allowed for reasonable future growth.

Sincerely,

Joe A. Smatian, Owner/Operator
FV Angelique

Cc: Governor Tony Knowles, State of Alaska, PO Box 110001, Juneau, AK 99811

Tongass Sportfishing Association

TROUT UNLIMITED CHAPTER 573

P.O. Box 8276, Ketchikan, Alaska 99901

North Pacific Fishery Management Council
Richard Lauber, Chair
605 W. 4th #306
Anchorage, AK 99901

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FEB - 2 2000

N.P.F.M.C

Dear Mr. Lauber,

Our association, since its inception, has been a strong supporter of conservative management of fisheries resources. We also have consistently supported fair access to the resource for all user groups.

We are, however, in strong opposition to the adoption of a guideline harvest level for Alaska's guided halibut sportfishery. We believe the proposed guidelines would worsen the already unfair access for guided and unguided sport fishers (relative to other user groups) to a public resource. Such guidelines would further require the guided sportfishery to be penalized to a disproportionate extent in comparison to other user groups. This is clearly unfair.

Please present these concerns to your council for consideration.

Respectfully submitted,

Gary K. Souza, Chairman
Tongass Sportfishing Association

Alaska Seafood Council Inc.

Box 91239 Anchorage, AK 99509-1239

Phone: 907-243-3166

Fax: 907-248-8933

February 1, 2000

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

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FEB - 1 2000
N.P.F.M.C

Re: Allocation of Halibut

Dear Mr. Lauber:

The Alaska Seafood Council is a coalition of Alaska fishermen, processors, seafood industry workers, and vendors to the industry, united to promote the commercial seafood industry in Alaska/Pacific Northwest. Our members are active participants in the commercial Alaska halibut fishery as harvesters, processors and shippers of fresh and frozen halibut to consumers throughout the world.

We believe it is important that the management of the halibut resource be based on sound management principals. The amount of halibut that is allowed for harvest must be based on the overall abundance of the resource. Abundance based management must rule commercial uses, whether it be for the commercial fishing industry or the commercial charter industry. All users must bear the burden of conservation in times of low abundance.

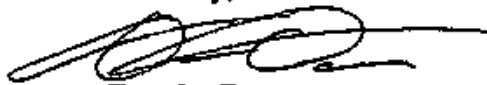
We have found over the years that when the harvester has a stake in the management of the resource, the harvesters (and those that support the harvesters) will be good stewards of the resource. They will support management measures required to maintain and enhance the stocks. They will provide useful information to enhance management efforts. If commercial charter boat operators receive a fixed allocation, or an allocation that does not reflect the actual abundance of the resource, what incentive will they have to safeguard the resource for the future?

Alaska's seafood producers depend upon a wide variety of products to be successful in the competitive food markets of today. Years of promotion of halibut have made it one of the most popular seafood items in American today. All consumers deserve the opportunity to have halibut on their plate, not just the few who can afford to fly to Alaska and hire a commercial charter vessel.

A fixed allocation to the charter fleet will not only take away halibut from the commercial industry, but also from the many consumers that cannot afford to go catch his or her own fish. Those consumers deserve consideration by the Council.

We respectfully request that the Council keep the commercial charter operators allocation abundance based and that you reaffirm your 1997 action that gave this commercial group the very generous allocation of 125% of their 1995 harvest of the halibut resource. We urge the Council to adopt management tools such as bag limits to allow the commercial charter operators to live within their allocation.

Sincerely,



Douglas Donegan
President

Cc: Governor Tony Knowles

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FEB - 2 2000

N.P.F.M.C

Mr. Rick Kaubow,

I am writing to you today because as a commercial halibut fisherman and member of Halibut Coalition Boop I stand to be greatly impacted by any ~~of~~ decision the the N.P.F.C. makes with regard to Halibut Allocation.

I would like to urge the council to use the 1997 G.H.L. with regard to any Charter Allocation Proposal. I believe any logbook data submitted in 1998 to be inaccurate. I am greatly concerned about the use of 1998 Data from logbooks because there is no unbiased confirmation of these catch numbers.

I would also like to express the view that any Charterboat allocation be abundance based rather than a fixed %.

To avoid the Charter Fleet a fixed ~~per~~ % could conceivably deny

anyone, but sportsman access to this valuable resource. I am not to only ask who would suffer if fixed allocation was adopted. There are ~~several~~ Fish Plants & their workers, Buyers, and distributors who also ^{would} be negatively impacted by being denied access to this resource. Finally, but also extremely important would be the consumers who ~~would~~ would be denied the right to Wild Alaska Halibut unless they fly to Alaska to catch it themselves. Many consumers do not have that opportunity, but prefer to do their halibut fishing at the local store ~~and~~ restaurant.

I do not favor any Charterboat Allocation, however if there is to be one I would favor the charter fleet being allowed to purchase shares from the existing I.F.Q. Pool. This could be accomplished by amending the current I.F.Q. program. It would also help in mitigating the

Losses of those people who currently hold I.F.Q shares, particularly those who have invested thousands upon thousands of dollars in the purchase of those shares.

In closing, I would just say thank you for taking the time and reading this letter.

Sincerely,

Paul Douglas

F/U Phoenix

P.O. Box 240372

Douglas, AK 99824

Ph. 907-740-2744

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FEB - 2 2000

N.P.F.M.C

January 24, 2000

Honorable Rick Lauber
NPFMC
605 West 4th Avenue, Ste.306
Anchorage, AK 99501
Fax(907) 271-2817

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N.P.F.M.C

Dear Chairman Lauber,

I am writing to support an allocation of halibut to the charter fleet based on abundance and historic levels. The chartered halibut fleet should not be allowed to expand at the expense of the commercial halibut fishery. The council should base the halibut charter fleet's allocation at 125% of their 1995 harvest.

I am a halibut Longline crewman. I depend on the commercial halibut fishery for over 50% of my annual income. I have saved to invest more than \$35,000.00 in halibut IFQ. This issue obviously is a direct threat to my ability to make a living, and could wipe out the financial progress I have made over these past 5 years. It seems grossly unfair to strip away what I have worked so hard for and to turn it over to the charter fleet.

The charter allocation should be set at 125% of the 1995 harvest, this was a generous compromise by the council in 1997 that allowed reasonable growth.

Your consideration of this letter is appreciated.

Sincerely,



Jon Daniels
F/V Indigo
2104 SE 156th
Portland, OR. 97233

cc: Governor Tony Knowles

February 1, 2000

Honorable Rick Lauber
Chairman North Pacific Fishery Management Council
605 West 4th Ave, ste 306
Anchorage Alaska 99501-2252
Fax 907-271-2817

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N.P.F.M.C

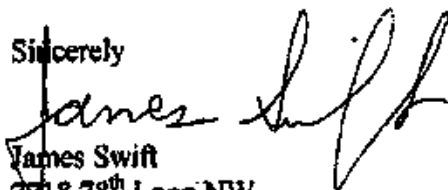
Dear Chairman Lauber;

The commercial halibut fishermen are going to take a considerable cut in their catch this year as the halibut quota cycles up and down, like it has done for decades. We, commercial fisherman, will gladly take the cut to insure healthy stocks in the future, as we have done for many decades. This most successful management system has been going on since the 1920's, started by the fisherman themselves, from Canada and the U.S. Today that is the Halibut Commission. The original treaty was signed in 1923. The health of the Halibut population is a direct result of the involvement of the commercial halibut fisherman. In the end it has been the commercial fishermen who have been the stewards of this valuable resource.

So after maintaining this fishery since the 1920's, we now may have to take a back seat to the growing sport/charter fishery. The charter catch in 1998 was 5.2 million lbs., doubling since 1994. It would be very unfair to the commercial fisherman and the halibut consumers to leave this an open-ended deal. We need to accept the GHL that was set for halibut charter boats in 1997. This is very important for the continuation of an orderly commercial halibut fishery.

I began commercial halibut fishing in 1971, handlining with my brother from a small boat, today I own and skipper the "Ginny C" a 65 foot longliner. I have fished every season since 1971.

Sincerely



James Swift
7918 78th Loop NW
Olympia WA 98502
360-866-1852

Fairweather Fish, Inc.
F/V Golden Chalice
6320 Rosedale St. N.W.
Gig Harbor, WA 98335

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FEB - 2 2000

N.P.F.M.C

February 1, 2000

Dear North Pacific Management Council Members,

My Husband and I run and own one 58' longline catcher vessel. We have made large investments in the new IFQ fishery and any changes made are of great importance to us and our crew of 5.

We would like to make a few points before your February meeting, we are unable to travel to Anchorage at this time, but would hope that our comments would still be considered similarly.

Halibut Charter: What ever is done concerning this matter, it absolutely cannot infringe on the Commercial Halibut sector, because that fishery has been bought, sold, and mortgaged. Whatever decision, it should be based on abundance. 1995 should be the base year. It is the first year of IFQs, therefore the math that follows will not infringe on the commercial sector. 1995 is a more accurate middle starting point, considering our stable, but declining Biomas of 2000. Charter Boats need to be more reportable and more predictable, and whatever restrictions can produce any amount of either will be helpful. Making decisions today that lead up to limited entry or IFQs for the Commercial Halibut Charter fleet is a good idea. We favor IFQs for the Charter Fleet, because of the species relationship. We feel the council has a more extensive range of options with an IFQ system.

Areas 4, Bering Sea, and Aleutian Islands: A gradual approach to change in these areas seems to be the most sensible. We gave testimony to the council in 1997 on this issue, stating that there were so many small blocks in the westward areas that they were unfishable and unsellable. Further, that even if every deckhand, on every vessel, owned and caught two blocks, there would still be blocks with nowhere to go. This is still true today. That is why we support allowing each individual to own more blocks. It would be a small change, and it still allows the block program to remain in design.

Alaska Gulf Coalition: As former residents of Pelican, Juneau, and Homer, we can feel the changes in the smaller coastal communities. We can see the changes, as the vessel makes its way through nearly every regulatory area in Alaska. The Golden Chalice is 58', it *must* makes stops in many of these smaller communities every year. We agree that special attentions should be directed at maintaining the economy of coastal communities, but also believe that IFQs are not entirely responsible for the trend that has brought down the economy in Alaskan coastal communities. Under the IFQ system individuals may receive a TEC, residents should have no problem with that. There is no reason for leasing or corporate ownership. Many fishing charter type operations have developed in these smaller coastal communities, and if limitations are placed on Halibut Charter Operations, special allocations need to be made to residents and Native Alaskans.

This IFQ system is working, and has generally received quite an amount of praise. We feel that putting changes to this system on a slow track is best. Making small changes one at a time and allowing time to analyze the results. It is reasonable to believe that changes in other fisheries will also effect the IFQ market. We believe that crab fisherman may begin to buy quota share in westward areas, to balance the loss to their industry. We thank you for considering our comments.

Sincerely,

Mark Worley
Lisa Newland

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FEB - 2 2000
N.P.F.M.C

February 2, 2000

Honorable Rick Lauber
NPFMC
605 West 4th Ave. St. 306
Anchorage, AK 99501

Subject: Halibut charter boat mgt. plan

Dear Chairman Lauber,

In April, the ADFG Sportfish Division, presented a proposal to the NPFMC that could award the guided sport industry a fixed allocation equal to 125% of the their 1998 landings. This allocation would remain fixed as abundance decreases except during years of "significant stock decline." During these exceptional years, the guided sport allocation could be lowered by 10 to 20%.

Just recently, the IPHC staff has recommended that the commercial halibut quotas be reduced in area 2-C and 3-A by 20% and 25% respectively. All user groups should share in this cut. Establishing a priority preference for charter vessels as the ADFG Sportfish Division requests will not only harm commercial users, but also local sport users and subsistence users. The ADFG proposal is an extreme departure from the State's stated goal of using abundance-based management for all users.

Chairman Lauber, I request that you drop the "fixed poundage" option since this option runs counter to long-standing Alaska management principles. As a lifelong Alaskan who has been commercial fishing for thirty-four years, the proposed allocation scheme by the Sportfish Division of the ADF&G sends a chill down my spine. Sport Fish should stick to management, not allocation!

We were pleased when the IFQ management plan was brought into being. This plan provided for a stable and safe fishery that made it easier to plan our future. I, along with my two sons, have recently purchased halibut IFQ shares. This fixed quota scheme will hinder my ability to repay my IFQ loan. We have invested heavily in IFQ's because of the stability promised by the government. Reducing the commercial harvest will reduce the value of our IFQ's and my boat.

My sons are fourth generation Alaskan halibut fishermen that have invested in their future by purchasing IFQ's. We are alarmed that we could one day see, under the ADFG Sportfish proposal, that 70% of the area 2C quota could be allocated to the guided sport halibut fishery during years of low abundance. According to the GHL analysis, "One of the principal factors in charter growth is directly related to tourism, particularly in Area 2C where nearly all charter clients are non-residents." Chairman Lauber, our ability to make a living in Alaska is being taken away from us by non-residents.

The GHL (allocation) that was set at 125% of the charter fleets harvest in 1995 gave the charter fleet a chance to grow. This figure must remain a percentage of the overall quota

so when the biomass declines, everyone's quota goes down. Consider this. If the halibut biomass drops back to what it was in the 70's (I remember this all too well) the commercial fishermen in 2C would be sitting on the beach while the unrestricted charter fleet is out harvesting the entire quota! Madness! The commercial fishermen and the charter fleet should be under the same rules. **When the quota drops, both entities should have their share dropped proportionally.** Fluctuations in price and quota are acceptable; losing quota to an unrestricted commercial group is not.

Chairman Lauber, it is imperative that you support the GHL (allocation) that was set at 125% of the charter fleets harvest in 1995. This action would go a long way in ensuring a stable and healthy commercial halibut fishery for my family and many other Alaskan families into the next millennium.

Respectfully,

George Eliason

2/1/00

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N.P.F.M.C

Honorable Rick Lauber
NPFMC
605 West 4th Ave., Suite 306
Anchorage, AK 99501

Dear Mr. Lauber:

I have been involved in the longline fisheries since 1978. During that time there have been many changes. Change is a natural state of life and I try not to resist it. The longline fisheries have undergone an enormous amount of change during my twenty-two years of participation, but through it all it has remained a viable and healthy fishery.

At this time the halibut charter fishery is being asked to make some changes. The time has come to put a limit on their catch, just as the time came for many other fisheries to limit their catches. I realize that in this case the base for change doesn't rest on the health of the biomass but the health of two fisheries competing for the same fish.

In the past fisheries have been limited through various programs, but all of them were determined on past participation. I think this is a fair and equitable way on which to base a limited policy. The commercial longline halibut fleet has already suffered through a major restructuring of who gets to fish and who doesn't. We have a historical participation in the level of harvest that we take every year that allows us to make a viable living, based on our past participation. It is only fair and equitable that the commercial guided halibut fishery operate on their historical level of harvest and participation.

I strongly support the proposal that the charter industry be allocated 125% of their 1995 harvest. This is more than fair in my estimation and is based on historical catch levels and is consistent with every other limited catch program. However they want to divide up that allocation is up to them.

Thank you for your time and attention and hard work on this issue.

Sincerely,



Sheryl L. Mayo

February 02, 2000

To : Rick Lauber
chairman , N.P.F.M.C.

Dear Mr. Chairman ,

As a longtime Cook Inlet/3A longliner I have watched the unchecked growth in the charter industry. Charter operators go to sport shows displaying pictures of only their best days, promising clients the world, giving them fish, encouraging boat limits. This behavior exceeds providing just transportation. I have a lifelong investment in the fish business. My gear was cut off by charter boats. I lost 10 skates. The L.F.Q. program, although not perfect, seems to be working. Apply it uniformly. Answer the question once and for all.

Sincerely,



John McCombs
box 87
Ninilchik, Ak
99639

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FEB - 2 2000
N.P.F.M.C

February 1, 2000

Glen Carroll
Box 551
Homer, Alaska 99603

Chairman Richard Lauber
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, Alaska 99501

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N.P.F.M.C

Dear Mr. Lauber,

So that you may know where I'm coming from, I will briefly say I am a small boat owner and have been involved in the pot cod fishery in Cook Inlet for several years. I have worked to develop a fresh whole round cod market shipped daily to Korea. I have lived in Homer all my life and have fished for a living for 40 years.

What I would like you to consider is the impact of the NPFMC's past actions and the effect of the closure of the Bering Sea Opie season. As I look around it seems the council has created some boundaries and stability to certain fisheries, such as the IFQ system, the pollock fisheries, the CDQ system, etc. Is the cod fishery unworthy of similar consideration? I have heard that in the pollock regulations the council has been very concerned with the impact on other fisheries. Please consider the effect of the IFQ program on those of us who have none. In the last few years I have heard many ways of using IFQ's to leverage into huge advantages such as gaining salmon tendering contracts, herring markets, etc. A man just told me the other day he was sure he would not be put on limits if the docks were flooded with cod because he knew that his processor wanted his halibut and black cod----other boats would be shut down, but not him!. This goes on and on. Imagine a loan package backed by 40 or 80,000 pounds of IFQ's.

I am being desperately impacted by this situation. I am not sure if I will survive as a cod fisherman after this year. It is frustrating to try to run a business when things change so rapidly. Somehow it just doesn't seem right that the crab fleet, having had million dollar seasons while they cleaned the crab out of the Bering Sea, should now be allowed to land on

the cod fishery, turning it into a derby.

The license limitation plan may be helping but it seems to have some "holes". First, many boats were allowed to make token deliveries and get a license, having never really participated in the fishery. Secondly, those that didn't qualify have not been limited - they just fish in State waters, compounding the problem further. This concentration of additional gear has a serious impact on us. The net effect of this is a total backfiring of the intent of License Limitation.

I don't want to point out these problems without offering solutions. There are several.

1. An IFQ program for cod.
2. A License Limitation plan without the "holes" mentioned earlier.
3. A 58' limit with a grandfather clause for those that really participated.
4. Pot limits.
5. Staggered Quota - additional effort speeds up the quote being caught, thus Cook Inlet gets a smaller share as we have the last spawning area.

Thank you for your consideration.



Glen Carroll

P. O. Box 5043
Nikolaevsk, AK 99556-5043
Ph. (907) 235-5321

January 29, 2000

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

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N.P.F.M.C

I support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stick with the decision you made in 1997 and establish effective management measures to keep the charter fleet within their allocation.

My family and I depend on the commercial halibut fishery for most of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, fishing gear and equipment suppliers, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town.

The IFQ system brought stability to the whole fishing industry, with it we could plan ahead knowing approximately how much money we will have at the end of the season, the banks were willing to give us loans at last. We invested heavily in IFQ because of the stability, which was also promised by the government. Now everything is going up in smoke with expanding charter boat fleet. I have been fishing commercially for halibut for 30 years, we have a small operation: 43 ft. boat that we also use for catching salmon in the Cooks Inlet, when they let us, we usually hire one crewman for halibut trips, the salmon season is strictly a family operation.

Reducing the commercial harvest of halibut will reduce the value of IFQ and our boat. It will also impair our ability to repay both the boat and IFQ loans. -

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

The North Pacific Fishery Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth.

● Page 2

January 29, 2000

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

Sincerely,

Rev. Nikolai Yakunin

Rev. Nikolai Yakunin

The Lighthouse Restaurant
Ramona Martin, Proprietor
Haines, Alaska 99827

Mr Richard Lauber, Chairman dscx ,
605 West Fourth Ave., Suite 306
Anchorage, AK 99501-2252

Dear Mr. Lauber;

I operate the Lighthouse Restaurant in Haines, Alaska. Halibut is one of the favorite items on my menu. I purchase about 2000 pounds of halibut fillets per year (3500 pounds of gross weight). I need a reliable, reasonably priced source of good quality product. Alaska needs a resource based allocation to the commercial fleet as well as the sport charter fleet. Please stay with the sport charter guideline harvest level established in 1997. Adopting a charter boat allocation based on other options under consideration will hurt access of myself and other consumers to this important product.

Sincerely,

A handwritten signature in cursive script that reads "Ramona D. Martin". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Copy: Governor Tony Knowles

P.O. box 32508
Juneau
Ak. 99803

Phone (907) 790-4867
Fax (907) 790-4813
Email lilipad5@gci.net

RECEIVED

January 28, 2000

FEB - 2 2000

N.P.F.M.C

N.P.F.M.C.
Richard Lauber, chair
605 west 4th. #306
Anchorage. Ak. 99501-2252

Dear Chairman Lauber:

I operate a sportfishing charter business in the Juneau area. I am a member of the (jcooa) Juneau charter boat operators asso. I am writing about some pending actions by the North Pacific Management Council (NPFMC) with regard to a harvest guideline (GHL) cap on the harvest of guided sport anglers and the management measures which may follow.

I have lived in Alaska for 30 years, fishing here most of my life, and doing business for 3 years. It is most gratifying to see clients catch fish and be able to take them home. This is the main source of income for my family and if it goes to a level that we can't provide for my clients I can only think they will go somewhere else or not come at all and that of course will be detrimental to my business. We do not sell or fish we take clients out fishing. Some of our clients are local people that can't afford a boat so we take them as well so we also keep it (the catch) local too. I have a hard time seeing that we are catching too many fish that we are even being considered being on a cap.

We support option #1 status quo. Some procedure problems are that sport users had little ability to impact the GHL levels.

The proposed GHL levels are too low.

The charter business is based on client days or client trips, NOT on pounds of fish caught and sold.

If action is to be taken,

The GHL to be as fixed as possible —not up or down.

Accept lower levels for conservation —NOT for increased commercial allocation.

Maybe the GHL level should be in number of fish not in pounds.

Use a three year rolling average before implementing management measures.

Moratorium:

*Interim moratorium only

*Identify the number of boats—in 1989-1999

*Develop a guided sport IFQ as a number of fish

*New entrants to guided sportfishing can purchase quota shares to get into the business.

I hope that things will work out for everyone, especially our clients that only dream of getting out to see and do our famous wildlife excursion and catch the fish of their dreams.

Thank you:

Sincerely,

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FEB - 2 2000

1-26-2000

Dear Sir,

N.P.F.M.C

I've been a commercial longliner for Black Cod and Halibut for over twenty years and have seen all the changes. In addition, I've also been a commercial Troll for 25 yrs. Due to health ~~prob~~ problems, I've been forced to sit out the last 2 1/2 yrs of commercial fishing but have participated actively in the sport fisheries for personal use. In my area (2C) I also saw the start of a Sport Fishing Lodge and the ~~grave~~ impact it's had on this community. Halibut over the last 3-4 years has gotten quite difficult to get. I've seen as ~~many~~ many as 8 boats at once in one small area in front of town hammering away on Halibut. This lodge has approximately 30 boats. They (Guided Sport Fishers), are going ~~unchuckled~~. When King Salmon Allocations came about, they wanted the Troll fish arguing that ~~Guided~~ Trollers would hardly feel it as they had their Halibut to fall back on. Now they want a portion of our (or Commercial Halibut Fishers), Halibut. Once I saw 2 men leaving town on the plane with 7 70 lb. boxes of fish. Who eats that much fish? The only way you can keep that much fish good to the last slice is in a commercial freezer, sell it on the ~~to~~

Black Market, or give it away.

I propose that Limited Sport Fishes remain on the 1997 P.H.L. If ~~etc~~ they don't like those limitations, maybe they can get together and go limited entry, Allow 2 fish per person (tags) 40 - 100 lbs only, releasing all over 100 and under 40 lbs, or go on a point system to buy ^{or sell} numbers of fish to Captains, who in turn can take clients out with the highest bid. If left unchecked they're all going to be out of business sooner or later anyway.

Thank You.

Sincerely,

KEN MEYERS
BOX 127
ANGON AK
99820

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

RECEIVED

FEB - 2 2000

N.P.F.M.C

GHL for Charter Fleet Comments

I am a commercial halibut fisherman and I rely on halibut for much of my family income. It is our first priority to protect the resource and in that vein all user groups need to share in the conservation of the resource.

The NPFMC should hold to the percentage guidelines for 1997. The compromise that came up with these percentages allowed for reasonable growth.

It is important to note that the charter boat fleet is not going to have to pay a penny to obtain this allocation, but I and many fisherman have made substantial investments involving business risk in order to purchase IFQ. I wasn't issued IFQ. I have had to buy all of the halibut that I own.

It would seem only fair that any additional harvest levels above the base harvest levels of 1997 needs to be addressed by means of an IFQ purchase program.

If the Charter industry desires to grow in the future they should have to buy IFQ, as many in the fleet have had to do.

Sincerely,
Greg Elwood
Second generation IFQ holder/ fisherman areas 3B & 4

Gregory Elwood

January 28, 2000

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

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N.P.F.M.C

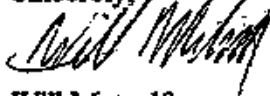
Dear Chairman Lauber:

I am writing to comment on the alternatives you are considering for management of the halibut charter fleet. I own a 38' troller/longliner and have fished commercially for halibut in Southeast Alaska (areas 2C and 3A) for sixteen years. I received halibut IFQ from my fishing history and I have also taken out a loan to buy more halibut IFQs. We live in Juneau year round and the income I earn from commercial fishing is spent in Southeast Alaska to support my family and my commercial fishing business. We use this money locally to buy fuel, groceries, supplies, moorage, utilities, freight, travel expenses and we pay property taxes in Juneau. We were raised in Southeast Alaska and we intend to continue to live here and spend our money here. I am very much opposed to any alternatives that allow the commercial halibut charter fleet to grow without limits or for the growth of this sector to occur at the expense of the existing halibut IFQ fisheries. Reductions in halibut IFQs in the future to support a growing halibut charter fishery will reduce my income and will reduce my ability to repay my IFQ loan.

Specifically, I request that the Council implement Issue 1/Option 1, a GHL expressed as a fixed percentage annually expressed in pounds. In addition, the halibut GHL should vary annually on the basis of halibut abundance (Issue 3/Option 1). I do not support the ADF&G sponsored option to grant the charter fleet a fixed or stair stepped allocation which is not directly linked to abundance. Failure of the State of Alaska to support abundance based management for halibut is contrary to their approach to management of the fisheries under their jurisdiction.

Thank you for your consideration of my concerns.

Sincerely,



Will Metcalf
F/V DISTANT
P.O. Box 21183
Juneau, Alaska 99802

Richard Lauber
Chairman-NPFMC
605 W. 4th. #306
Anchorage, AK 99501

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N.P.F.M.C

Greetings,

My name is David Pinquoch, owner of Alaska Good Time Charters, operating from the port of Whittier.

I have been quietly involved in the charter boat halibut issue for about a year. I have been trying to find common ground with other proposals rather than submitting yet another idea. Since I can't attend the meetings in February I hope this letter will suffice as my comments.

The Council Review Draft prepared by the NPFMC and the AK Dept. of Fish and Game is flawed in many areas, numbers are incorrect, comparisons are weighted to show growth of the charter industry that isn't there. Example- Draft indicates 2 vessels in Whittier that will qualify using Option 1. I would GUESS that the number is 20 and I don't have access to the records. Comparisons are made based on the number of fishing licenses to the number of fish caught. More pressure almost always results in less fish per license caught, yet it is not considered. Caution should be used making decisions based on this data.

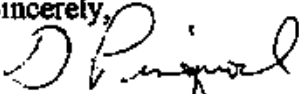
The only action suggested that would reduce catch is a one fish limit. That is not acceptable. This action will cause charters to lose too much business. I have asked several past clients. The figures used in the Draft are low. I would expect to lose about 40% of my halibut charter business. Sport fisherman were cut back to two halibut from four halibut years ago. The limit of two was based on declining stocks yet a limit of four was not reinstated when stocks rebounded. Now a one fish limit is on the table, not because of stock abundance, because commercial fisherman want to maintain 75% of the catch or more. It isn't right.

What is the answer? The only option I've seen that will put this to rest and let us go on with life is to give the charter fleet IFQ's. Several other charter boat operators are also coming to that conclusion. Every other option I've seen will bring us back to the table over and over. The issue then becomes how to divide up the quota. My proposal for division of quota is the last item of this letter. The quota division must use 125% of the 1998 catch which should be 197,230 fish for Area 3A and 77676 fish for Area 2A to keep businesses afloat. I am totally opposed to taking each vessels catch and multiplying by 1.25. I for one have been conservative over the years. I do multi-day trips, up to 7 days. On almost all trips I still limit my clients to 4 halibut. I have freezer space and can take more but most people can't use more than 4 halibut in a year and I explain that to clients. I also am opposed to the charter boats that take clients out at 6 pm and return at 6 am with two limits. These charter businesses need to start selling sport fishing and not meat fishing. Giving these vessels 125% of their catch rewards them even more. The unused quota should be shared equally, no one should have more rights to it than anybody else.

Does a decision have to be made now. NO. The numbers speak for themselves. The 1999 catch is below 1998's. The increase in vessels is minimal.

I would support two regulations for the 2000 season. They would slow the charter fleet down some if it is decided to postpone a decision. Each vessel should be limited to one daily limit of halibut per 24 hour day. Captain and crew should not be allowed to harvest halibut while on a halibut charter. The regulation should not state that captain and crew cannot fish. This could result in a crew member getting cited for fishing when all they are doing is assisting clients. Assisting clients with big fish is often imperative.

Sincerely,



David Pinguoch
Alaska Good Time Charters
PO Box 876257
Wasilla, AK 99687
(907) 373-7447

Dividing IFQ for the Sport Halibut Charter Fleet

1. Count the number of halibut caught by clients for each business in 1998.
2. Count the number of halibut caught by clients for each business in 1999.
3. Add the 1998 and 1999 catch and divide that number by 2. That amount of quota is given to each vessel/business.
4. Take 125% of 1998 catch, subtract the total allocation distributed in number 3.
Area 3A-197,230 minus average catch not including crew fish equals remaining fish.
Area 2C-79,938 minus average catch not including crew fish equals remaining fish.
5. The remaining fish will be divided as follows.
 - a. All six pack vessels are given one share.
 - b. Inspected vessels will be given shares based on the highest number of clients who fished halibut. This would be determined by the highest number of clients taken on one halibut charter in 1998 and one halibut charter in 1999 and dividing that number by 2.
 - c. Inspected vessels will receive one share for each 6 clients or portion thereof, up to 4 shares. (7 thru 12-2 shares, 13 thru 18-3 shares, 19 or more- 4 shares.)
6. Add the total number of shares for all six pack vessels and inspected vessels.
7. Take the number of fish remaining(number 4) and divide that number by the number of shares determined(number 6)to determine the value of each share.
8. Add the number of fish caught by each business(number 3) to the share value of each business to determine the IFQ to be distributed to each business.

Example-

Guzzlin' Pete Charters has two vessels- Six Pack(uninspected) and Suitcase(Inspected for 22 passengers)

Six Pack Logbooks show-1998 client catch was 169 halibut
1999 client catch was 120 halibut
169 plus 120 equals 289 divided by 2 equals 145.(any portion of a fish counts as one)

Suitcase Logbooks show-1998 client catch was 642 halibut
1999 client catch was 630 halibut
642 plus 630 equals 1272 divided by 2 equals 636
The most clients Suitcase had on board fishing for halibut in 1998 was 14 and in 1999 was 17. 14 plus 17 equals 15.5. Suitcase qualifies for 3 shares.

The total number of shares in area 3A is determined to be 540. The number of fish available after taking out the average client catch of qualifying vessels is determined to be 52,000.

52,000 divided by 540 shares equals 93 fish per share.

Six pack would then receive a quota of 145(avg catch) plus 93(one share) or 238 halibut.
Suitcase would receive 636(avg catch)plus 279(three shares) or 915 halibut.

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

Michael G Brooks
Brooks Alaskan Seafood
38225 Greer Road
Homer, Alaska 99603

Dear Mr. Lauber

We are an Alaskan family owned business with a fifty year involvement in the Alaskan Seafood Industry. We support granting the charter fleet a percentage allocation that is based on abundance and historic levels. To be specific we strongly urge you to maintain the decision that was made in 1997 and establish effective management measures to keep the charter fleet within their allocation. Any other action by the council will result in less halibut consumers and impact seafood industry workers, many who are year round Alaska residents, and companies that have invested in Alaska halibut.

We have one plant and three buying stations in Alaska. These are located in Homer, Seward, and Valdez. We employ three full time workers and seasonal employment in sustainable jobs within Alaska averages twenty persons. Revenue generated by our operation is spread throughout the Alaskan economy and within our own community. Commercial halibut dollars flow through almost every business in town. Reducing the commercial harvest will reduce the value of our investment in both capital assets and marketing. In addition it will result in less raw fish tax for both communities and the state; reduced sales tax for goods we purchase and possibly less property taxes.

Commercial fishermen and processors have been responsible stewards of the halibut industry and have fished under these rules since 1923. Removing the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and undermines the State of Alaska's credibility. Abundance Based Management has been a cornerstone of a successful management program and it is not wise to abandon it.

The North Pacific Management Council should keep the charter allocation at 125% of the 1995 harvest since this was a generous compromise by the Council in 1997 that allowed reasonable growth. Thank you for your consideration. Sincerely,

cc

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

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FEB - 2 2000

N.P.F.M.C

Michael G Brooks

Michael G. Brooks

F/V ARCHANGEL

PHILLIP R WYMAN

907-747-5568



P.O. BOX 2507

SITKA, ALASKA 99835

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FEB - 2 2000

N.P.F.M.C

HONORABLE RICK LAUBER, CHAIRMAN
NPFMC
605 WEST 4th AVENUE, Ste 306
ANCHORAGE, AK 99501

DEAR CHAIRMAN LAUBER,

I AM WRITING CONCERNING THE PROPOSAL BEFORE THE NPFMC THAT DEALS WITH THE ALLOCATION OF HALIBUT TO THE CHARTER BOAT FLEET. I STRONGLY FAVOR THE OPTION THAT PROVIDES AN ALLOCATION BASED ON 125% OF THE 1995 CHARTER FLEET'S HARVEST.

AS A PERSON WHO HAS BOUGHT 2/3 OF HIS IFQ'S WITH ALL OF HIS EARNINGS FROM THE EARLY 90'S AND WITH SEVERABLE LARGE LOANS, IT IS VERY DISHEARTENING SEEING MY FAMILY'S INVESTMENT IN STABILITY BEING TAKEN AWAY. MY CREWMEN AND THEIR FAMILIES WHO HAVE ALL INVESTED LIKE MYSELF&FEEL THE SAME WAY.

AS A LIFE-LONG ALASKAN OF 49 YEARS, I AM DISGUSTED WITH THE ADF&G'S POSITION ON REALLOCATION. THEIR ONLY REAL CONCERNS ON THIS ISSUE SHOULD BE PROVIDING RESIDENT ALASKA SPORT FISHERMEN THEIR FAIR SHARE AND GOOD DATA TO YOUR BODY. IT IS OBVIOUS TO ME, THEY ARE DOING NEITHER. IT LOOKS LIKE THE ADF&G'S SPORT FISH DIVISION SHOULD BE FILING IN JUNEAU AS A LOBBYING GROUP REPRESENTING THE CHARTER INDUSTRY.

AS I LOOK AROUND SITKA LATE IN JANUARY, IT IS EASY TO SEE THAT THIS IS NOT THE SAME ECONOMICALLY THRIVING TOWN OF 10 YEARS AGO; TIMBER IS COMPLETELY GONE, REPLACED BY CLINTON'S MILLIONS IN TONGASS STEVEN'S MONEY THAT IS BEING SPENT FOOLISHLY ON ATTEMPTS TO CREATE JOBS THAT AREN'T ECOMOMICALLY VIABLE. THE NATIVE CORPORATIONS THROUGHOUT THE REGION ARE, FOR THE MOST PART, OUT OF OF TIMBER TO HARVEST AND ARE GOING BROKE CAUSING JOB LOSS AND INSTABILITY IN THE NATIVE COMMUNITY. THE LOCAL COLLEGE IS GOING UNDER CAUSING A 60 JOB LOSS. THE LOCAL SALMON FISHERIES ARE ON A ROOLER-COASTER RIDE CAUSED BY A FLOOD OF FARMED SALMON AND OUTDATED PROCESSING TECHNOLOGY.

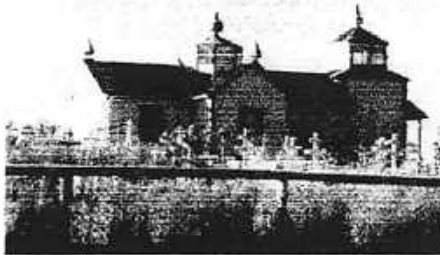
I CAN GO ON AND ON, BUT THE MESSAGE IS SIMPLE, HALIBUT IFQ'S PROVIDE STABILITY FOR MY FAMILY AND MY CREW'S FAMILIES AND TO OUR COMMUNITY OF SITKA. WE DO NOT NEED IN 5 YEARS FROM NOW A JOB'S PROGRAM TO RETRAIN MY DISPLACED LONGLINE CREWMEN. WE DO NOT NEED A ONE-TIME FEDERAL DISASTER FUNDING PROGRAM TO PHASE US OUT LIKE THEY ARE DOING TO US IN GLACIER BAY. WE NEED YOUR BODY TO STOP THE CHARTER FLEET'S GROWTH AND LIMIT THEIR HALIBUT TAKE TO THE 1995 LEVELS.

THANK YOU,

Phil Wyman
PHIL WYMAN

F/V ARCHANGEL
BOX 2507
SITKA, ALASKA 99835

NINILCHIK CHAMBER of COMMERCE
P.O. BOX 39164
NINILCHIK, ALASKA 99639
(907)567-3571 phone/(907)567-3581 fax



N.P.F.M.C

FEB - 2 2000

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January 17, 2000

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

Dear Chairman Lauber & Council Members:

I would like to express the concerns of our organization and the members that it represents.

We support conservative management of the halibut resource. We support fair and reasonable access to the halibut resource for all users.

As a local organization representing diversified interests, we want to strongly endorse our support of the sport fishing industry and their concerns dealing with the reduction of bag limits of halibut at this time.

The sport fishing industry is the main base of economy in our local area; not to mention the millions of dollars that it brings into the State of Alaska. If the bag limit for halibut is reduced as opposed to other means of limitations that are options, it will literally dispose of hundreds of jobs and will drastically affect our economy.

It is of our opinion that other measures can be taken to avoid reduction in the bag limit for halibut.

Thanking you in advance for your consideration of the views of our diversely represented organization.

Respectfully,

Jodi L. Evers
President

Rick Lauber, Chair
North Pacific Fish.
Management Council
605 West 4th Ave. Ste. 306
Anchorage, AK 99501



JUNEAU, ALASKA

Re: Halibut Charter Share

January 25, 2000


Dear Chairman Lauber,

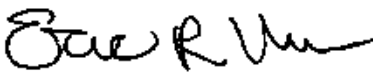
We are writing to urge you to stay within the guideline harvest level action that was originally set for Halibut Charter boats in 1997. At this point in time, adopting a charter boat allocation based on the other options under consideration is very unfair to those of us who have played under existing rules for the past 15 years in this IFQ qualification process.

We operate a Seafood processor that purchased two million pounds of halibut in 1999 and the eight-month halibut season is a mainstay for our crew and their families aside from the hundreds of commercial boats that we deal with. Everyone involved in the commercial harvesting of halibut has had to qualify and or buy into the fishery. Processors have had to re-tool in a significant manner in order to play the game as it has been established for the past 5 years under the IFQ management scheme. It is completely unfair to now re-allocate this catch in mid stream to a "new" and rapidly growing user group without having them pay to play as the saying goes. An allocation of this sort will also take significant raw fish tax dollars to the State of Alaska off of the table.

The Commercial fishing industry, comprised of fishermen and processors deserves and needs abundance based management to preserve a viable economic fishery and requests the sound judgement of the Council in allocating this valuable fishery.

Sincerely,


Sandro Lane
President


Eric Norman
General Manager

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FEB - 2 2000
N.P.F.M.C.

Dear Council,

I have Longlived For halibut commercially in SE Alaska, as well as the gulf, for the last 30 years or so. I have invested heavily in halibut IFQ's, and don't exactly consider it fair or just that the charter industry has been allowed to grow unchecked at the expense of the commercial fisherman.

Commercial fishing is an economic necessity in most of our small SE. Alas. towns, providing many jobs to many residents

I am writing to urge the council to vote to cap the charter harvest to 125% of the 1995 harvest.

Also, I think ADF&G should stay out of Allocation issues, and concentrate on management, as they have done in the past.

Thank You
Tom Will
Sea Dog
Anacortes, WA
Tom Will

1/21/00

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

I have fished halibut commercially since 1948. Like so many of us it became a way of life and we were not blessed with charter boats in those days. The weather and drunk crew members plus low prices 10-14 cents a pound were our major problems.

Now we have charter boats all over the place and they want to catch all the fish. It's a great sport to them every day.

Fishing is a commercial fisherman's means to survive and we in turn keep related business in operation. Those small coast towns have a function also.

The typical charter boat is from the sunny south, they grab all they can get and are gone. No support from them for the local communities.

Please consider keeping them under control so our way of life and the consumers of halibut can continue to exist.

L. Aquilino, "Angie" (40')
Fishing Vessel, "Angie" (40')
715 Montague St. #3
Sitka, Alaska 99835

RECEIVED

FEB - 2 2000

N.P.F.M.C

January 25, 2000

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

We support granting the charter fleet a percentage allocation that is based on abundance and historic levels. Specifically, you should stay with your 1997 decision and establish effective management measures to keep the charter fleet within their allocation.

My family depends on the commercial halibut fishery for a majority of our income. My wife and I grew up fishing Southeast waters and still do today with our young children. We invested in ourselves and ability to continue fishing by purchasing IFQ's for halibut in both 2C and 3A. We did this in part because stability in the fishery was promised us by the government. Reducing the commercial harvest will reduce the value of my IFQ'S and my boat. It will make it very difficult for some fishermen to repay boat and IFQ loans, ultimately forcing them out of business.


IFQ halibut generates income for many people and businesses. Fishermen and their crew and families spend money at grocery stores, gear stores, fuel and a myriad of other places. Commercial dollars go through almost every business in town.

Fishermen know of the volatility and the risks involved with commercial fishing and understand the need for abundance based fisheries management. Commercial fishermen have been very understanding of these changes and do everything they can to be compliant with the rules of the International Halibut Commission since 1928. If the halibut charter harvest is separated from this policy it is poor public policy, gives the charter boats no incentive for conservation for all halibut harvesters, and snubs it's nose at the State of Alaska! Abundance based management has been a corner stone of a successful management program and it is not wise to abandon it.

If the current proposal to follow the halibut sport charter harvest data is allowed, then on the low years sport users will be allowed to catch 70% of the 2C halibut and 40% of 3A BEFORE commercial users! This data has also shown a doubling of the catch from 1997 to 1998 alone! If 1998, instead of 1995 is adopted as a base year of the allocation, the charter vessels would receive over 18% of the combined commercial/charter harvest in 2C and 15% in 3A.

The charter allocation should be set at 125% of the 1995 harvest since this was a generous compromise by the council in 1997 that allowed for reasonable growth. Please take careful consideration before making your final judgment in this matter.

Sincerely,


Randy and Dina Gregg
F/V Patriot
PO Box 20373
Juneau, Ak 99802

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FEB - 2 2000

N.P.F.M.C



February 1, 2000

North Pacific Fishery Management Council
606 West 4th Avenue, Ste. 306
Anchorage, AK 99510

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FEB - 2 2000
N.P.F.M.C

Dear Members of the Council,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I wish to submit the following comments on the halibut charter boat management plan, scheduled for final Council action at your February meeting.

1. First, and foremost, ALFA urges the Council to **take final action on this issue at this meeting**. No more delays. As the analysis bluntly states, "no action would result in continued unconstrained charter halibut harvests and a *de facto* reallocation of halibut from the commercial sector to the charter sector." (p. 202) This *de facto* reallocation has continued over the seven years that this issue has been before the Council. The halibut industry deserves a decision--and one that recognizes the long history of the commercial halibut fisheries in Alaska. Several thousand halibut fishermen are waiting for your decision, as are their crews, the processors, the coastal community residents and the halibut consumers across the nation who depend on this resource. There can be no more excuses for delays. Place an upper bound, or GHL on the charter halibut harvest in February.

2. **Base the GHL on the 1995 halibut charter harvest.** In 1997, the Council adopted a halibut charter harvest that granted the charter fleet a GHL based on its largest catch--plus allowed an additional 25% for additional growth. No group of GOA commercial fishermen have ever received such a generous allocation from the Council. The charter fleet was directed to use the time permitted by the 25% growth factor to develop management measures to keep the halibut charter harvest below the GHL. The action before the Council at this meeting should be exactly that: reconfirm the GHL adopted in 1997, which was based on the 1995 catch, and select the management measures that will effectively control the charter halibut harvest.

The analysis provides the Council with 1998 as an alternative year on which to base the GHL. Beside the obvious inequity of back-tracking on a motion adopted by the Council in 1997, a review of the analysis and recently provided data establish that 1998 would be a highly inappropriate year on which to base the GHL--at least in area 2C--for reasons explained below.

A recent paper by Calvin Blood (IPHC Report of Assessment and Research Activities 1999) on the sport fish fishery clearly establishes that 1998 was an anomalous year for the charter fleet in 2C. The 2C charter harvest increased by 80% over 1997 levels, with the "increases in harvest and effort from remote areas which ADFG does not sample"--and therefore could not verify. The weight of halibut caught from charter boats also increased dramatically and inexplicably in 1998. In 1999, "changes were made in catch sampling programs to increase the number of halibut measured at various sites in 1999." In 1999, average weights were down in several areas by 5 to 10 pounds, which also "contributed to the 1999 harvest returning to pre-1998 levels." A review of charter halibut harvest in 2C over time indicates that, while the trend is definitely upward, 1998 was an inexplicable and unverifiable spike (see table on following page). 1998, in other words, was an anomaly for which no one has an explanation. Clearly 1995 is a more appropriate year on which to base the GHL.

Charter harvest by year and area in thousands of pounds.

Area	1995	1996	1997	1998	1999	3 year ave.
2C	966	936	852	1,767	1,001	1,206
3A	2,839	2,885	3,512	3,238	3,152	3,290

The Alaska Department of Fish and Game has proposed a number of alternatives using ranges, numbers of fish (as opposed to pounds of fish), rolling averages, etc. ALFA members maintain that the GHL should be established as a percentage of the combined charter and commercial harvest, using 1995 as the base-year—as approved by the Council in 1997. If ADFG continues to promote establishing the GHL as a range, ALFA would expect the range to be based on 1995, instead of 1998. Any further consideration of 1998 as the basis of the GHL, be it a point estimate or a range, is clearly indefensible.

3. The charter GHL must fluctuate with abundance. Abundance-based management is the key to Alaska's success in fisheries management. Because quotas are directly related to abundance of stocks, Alaska's commercial fishermen have a direct stake in conservation. When stocks are healthy, fishermen are allowed to catch more fish. When abundance is down, fishermen tighten their belts and accept lower quotas. Abundance-based management has trained commercial fishermen to think of the long-term and to be responsible stewards of the resource. Uncoupling a segment of the industry from the State and Federal policy of abundance-based management would set a dangerous precedent. It would also be grossly unfair to commercial, sport, and subsistence halibut fishermen who would suffer quota reductions or a reduced availability of halibut in years of low abundance while the charter fleet enjoyed a harvest disproportionate to abundance. The percentage-based allocation adopted by the Council in 1997, which allocates to the charter fleet a fixed percentage of the combined commercial and charter harvest, would equitably tie both fleets directly to fluctuations in abundance.

All options proposed by ADFG in Issue 3, suboption 2, which establishes a GHL range that is reduced by a set percentage in years of declining abundance, uncouple the GHL from the abundance-based approach. As outlined in the analysis (p. 199), the commercial quota would be reduced by 42-70 percent, depending on the trigger selected by the Council, before the charter harvest would be reduced at all—and then the charter GHL would only be reduced 10, 15 or 20 percent. In other words, under the best case scenario from the commercial perspective (e.g., in 2C an 8 million pound total removals trigger that results in a 20 percent GHL reduction) the commercial quota will have dropped by 42 percent before the charter GHL range is reduced at all, and then the reduction in the GHL will be half the reduction imposed on the commercial fleet. Under the worst case scenario, the commercial quota will have been reduced by 70 percent before the charter fleet faces any cuts—and then those cuts would be a mere 10 percent reduction in the range. These stair-steps are inequitable and a violation of the Council's abundance-based management policy.

The sub option added by the Council at the last meeting, which would make the reduction in the charter harvest proportional to the reduction in the halibut CEY, is the only option that should be considered if the Council chooses to move away from the fixed percentage toward a range with triggers. In other words, if ADFG continues to insist on a stair-stepped approach, the only stair-steps that should be considered are steps that are proportional to changes in abundance. For example, using 1995 or 2000 as the base year, if the CEY in 3A drops by 10 percent or more, then the charter GHL (or GHL range) should drop by 10 percent or an amount equivalent to the drop in abundance. In this scenario, the triggers would be 10 percent and the stair steps equivalent to the stair-steps taken by the commercial fleet between 1995 or 2000, depending on the base year selected by the Council, and the year in which the trigger was reached. This is the suboption that was inadvertently omitted from the analysis by staff, but included in the supplemental analysis finalized on February 1st. It is the only range/trigger/stair-step option that is equitable to commercial, sport and subsistence halibut fishermen, and the only alternative to the fixed percentage approach that the Council should consider.

4. Adopt effective measures to control charter harvest when/if the GHL is reached or exceeded. As the analysis states: "Of the eleven measures to constrain charter harvests in future years to within the respective GHLs analyzed here, only bag limits and prohibiting crew-caught halibut appear to limit charter harvests." (p. 204). ALFA urges the Council to adopt these measures, and to task NMFS with implementing them the year after end of season data indicates that the GHL was reached or exceeded in an area.

As was pointed out by the SSC, the AP and the Council at the last meeting, the analysis overstates the impact of reducing the bag limit to a ludicrous degree. The analyst uses catch rate as a proxy for fishing quality, not differentiating between fish caught and fish kept. An angler is told he or she can only catch one halibut from a charter boat, rather than indicating that an angler may catch many, but only keep one halibut. Currently in 2C, one halibut is released for every two halibut retained, and in 3A, one fish is released for every fish retained. Clearly anglers enjoy, or at least participate in catch and release fishing. The information included in the analysis showing the actual reduction in effort in the Southeast salmon fishery under reduced bag limits (p. 181) and the estimated percentage of total harvest reduction, by month, through implementation of a one fish bag limit in 2C during 1998 and 1999 (p.180) far more accurately reflect the impact on harvest of reducing the daily bag limit. The discussion of the participation effect (p. 181-183) should be deleted from the analysis.

4. Develop a long-term solution. ALFA recognizes that the charter fleet would like stability (i.e., no new entrants into "their" fishery) and an opportunity for additional growth. The commercial fishermen would also like stability--especially those people who have invested their life savings in halibut quota shares. Approval of an abundance-based GHL, based on the 1995 charter harvest as adopted by the Council in 1997 and established as an upper limit on charter growth, will provide short-term stability to all sectors. In the long-term, the charter fleet believes it needs a moratorium and, ultimately, to be included in the commercial halibut IFQ program. ALFA supports the charter fleet in both efforts, and will assist in any way possible to develop these programs.

If the Council decides at this meeting to pursue development of an IFQ program for the charter halibut fleet, it would seem imperative that the GHL be based on pounds harvested, not numbers of fish. At minimum, enforcement should be queried on the possibility of monitoring an IFQ program that counted fish instead of recording weights. Certainly, if the intent is to allow charter operators to buy quota share from commercial fishermen and vice versa, the two programs need to operate with the same accounting system. Only by making the two systems one will the bitter debate over the "best" use of the resource be resolved in the long-term.

Although the reminder may be unnecessary, the Council must keep in mind a realistic time-frame for developing and implementing a charter IFQ program. Limited entry of any kind has never happened as quickly as industry or managers would like it to. **Future IFQs are not an excuse for delay--a GHL must be adopted at this meeting.**

In closing, the time has come to act; the halibut charter boat management issue has been before the Council for seven years and demands resolution. ALFA urges the Council to reaffirm the GHL adopted in 1997 and to approve: 1) in-season bag limit reductions and, 2) non-retention by skipper and crew as measures to constrain the charter harvest to the GHL as needed. ALFA members are willing to consider ranges and stair-stepped measures with triggers, provided those triggers are reasonable and the stair-steps are equivalent to changes in the CEY calculated from a base year of either 1995 or 2000. Members support the charter fleet in their efforts to secure a moratorium and IFQs--if and only if a GHL is approved.

Thank you for your time and attention.

Sincerely,


Steve Fish, ALFA

Don N. & Carolyn Bunker
P.O. Box 604
Anchor Point, Ak. 99556
(907)235-6935

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FEB 4 2000

N.P.F.M.C

February 1, 2000

Honorable Richard Lauber, Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Suite 306
Anchorage, Ak. 99501-2252

Re: Guided Sport Halibut Charter GHL

Dear Mr. Lauber,

I am expressing my feelings and concerns. If several of the issues and options are accepted, it would have a severe negative financial impact on my family. I have chartered part time since 1990, I also own halibut QS in area 3A. One third of our effort is in the commercial halibut fishery. We have invested in QS and depend on a viable commercial halibut fishery.

The Council approved a GHL in 1997 based on a fixed percentage of the 1995 harvest of the charter fleet. Please keep this in place. Allocation of the resource must be based on the abundance of the resource.

I support a LAMP with the charters. This should be based on historical participation in the fishery. Charters legally operating two of the three base years 1995, 1996, and 1997 plus 1998 & 1999 would be issued a transferable moratorium permit. Charters not in operation at least two of the base years plus 1998 & 1999 would be issued a non transferable permit (sunset permit). This would allow an orderly decrease in the charter fleet. For a transferable permit, if the skipper held and uninspected vessel license, he would be limited to a 6 pack. Eliminate the skipper and deck hands from fishing while charting. This has been abused, some of their fish do reach the market.

During the derby days the fish belonged to all user groups. With the adoption of the IFQ system (QS= halibut) QSs have been bought and sold for enormous amounts of money. Please do not allow the charter fleet allocation to bankrupt the commercial halibut fishermen.

Sincerely,

Don N. and Carolyn Bunker

Bruce & Theresa Gabrys
10229 Baffin Street
Eagle River, AK 99577
(907) 694-3874



January 30, 2000

Honorable Richard Lauber
Chairman, North Pacific Fishery Management Council
605 West 4th Ave. Suite 306
Anchorage, Ak 99501-2252

Re: Opposition to GHL Issue 1, Option 4 (GHL percentage prior to bycatch and waste)

Dear Chairman Lauber,

I am opposed to the recommendation of Council member Mr. Joe Kyle that charter GHL be applied as a percentage of CEY prior to deduction for commercial bycatch and wastage. The amount of commercial bycatch and wastage is primarily a function of the trawl fishery. The burden of trawl bycatch and waste should not be assessed against the commercial long line fleet.

All users of the halibut resource should have a vested interest in the reduction of bycatch and waste. Computing charter boat GHL prior to deductions for bycatch and waste would exempt the charter boat industry from the impact of bycatch/waste allocation decisions.

If the Council chooses to apply the GHL as a percent of CEY prior to deductions for commercial bycatch and waste; then the GHL percentage, as originally intended by Council (based on 1995 or 1997) needs to be adjusted downward. In other words, to retain the allocation equivalent, the allocation base "pie" is larger, so the percentage must be reduced.

If the intent of the proposal by Mr. Kyle is to increase the size of the charter GHL relative to the long line fleet, it would be more appropriate for it to be stated as a proposal to increase the GHL. Then the Council could vote to accept or reject the proposal.

Sincerely,

A handwritten signature in black ink that reads "Bruce Gabrys".

Bruce Gabrys

CC: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Bruce & Theresa Gabrys
10229 Baffin Street
Eagle River, AK 99577
(907) 694-3874

January 31, 2000

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FEB - 2 2000

N.P.F.M.C

Honorable Richard Lauber
Chairman, North Pacific Fishery Management Council
605 West 4th Ave. Suite 306
Anchorage, Ak 99501-2252

Re: Approve Halibut Charter GHL at February Council Meeting

Dear Chairman Lauber,

I am writing to urge you, and the other council members, to approve the original guideline harvest level (GHL) that was set for halibut charter boats by the Council in 1997. Additionally, allocation needs to be tied directly to abundance. The "stair step" proposal offered by Deputy Commissioner Benton is unfair and is contrary to Alaska's stated goal of using "abundance based management" for resource management decisions.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. We have borrowed over \$200,000 to purchase halibut IFQ in addition to \$250,000 we have invested in the fishery. This significant financial commitment was made because of the assurance of stability promoted by the government. The urgency of the GHL decision is intensified by the drastic reduction in quota for the 2000 season.

I, like many other fishermen, need to work multiple fisheries to remain economically viable. With the commercial salmon industry in financial disrepair, we cannot survive the derailment of the commercial halibut fishery.

Sincerely,



Bruce Gabrys

CC: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

January 30, 2000

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

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N.P.F.M.C.

Dear Mr. Lauber:

I have been commercial fishing for halibut for 20 years. During this time I have seen the quota for halibut fluctuate up and down as the health of the stocks has varied. I have accepted these fluctuations as a necessity of maintaining the health of the stocks.

The un-restricted growth of the charter industry has been steadily eating away at the portion of the TAC left available to the commercial fleet. It is now time to recognize that the charter fleet also has a responsibility to help maintain the health of the halibut resource, instead of placing this burden solely on the backs of the commercial fishing industry.

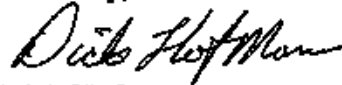
Many charter operators are quick to say that while the commercial fleet has seen an increase in the TAC, they have not been allowed to increase their catch beyond the two fish a day bag limit. In their minds this seems to equate to no increase in their harvest rate. They seem to ignore the fact that there has been a steadily increasing portion of the halibut TAC allocated to them. It is true that the bag limit has not changed, but the number of operators and clients has been steadily increasing, resulting in more halibut being harvested by this segment of harvesters.

Many charter operators state that there is not a conservation concern with the halibut resource. This claim is a disservice to the NPFMC and the IPHC. Both of these organizations exist because of the recognition that management is necessary to maintain the health of the halibut resource. If there truly were no conservation concern, then neither of these organizations would be involved in the management of the halibut harvest. Since they both are, then there can be no doubt that conservation concerns do exist and need to be addressed.

For the reasons stated above, and to maintain the health of the halibut resource for the future, all users must share the conservation burden. **The best, and fairest, way to make all harvesters aware of, and share in the conservation, is to establish a fixed percentage allocation. I strongly urge you to stay with the 1997 GHL decision.** Any other decision will leave the charter fleet with the continued impression that no conservation concern exists.

I know that any fixed allocation may inject some level of uncertainty into the operations of the charter fleet. These uncertainties are no different then the ones that I have had to operate under for the last two decades. It must be understood that a fishing license only guarantees and opportunity to fish, it does not guarantee a harvest. Even under the IFQ system the amount of halibut I am allowed varies and in some years I have not succeeded in catching my full quota. I accept these vagaries as natural part of my life as a fisherman and it is time for you to let all users of the resource know that they are no different.

Sincerely,



Dick HofMann
5025 Thane Rd.
Juneau, Alaska 99801
(907) 586-3451

January 27, 2000

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FEB - 1 2000

N.P.F.M.C

Richard Lauber
605 W. 4th #306
Anchorage, AK 99501-2252

Mr. Lauber,

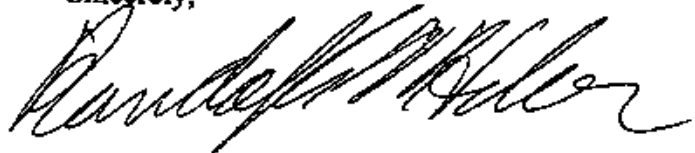
I am writing this letter because I feel that the NPFMC would be making a management error by limiting the access of sportfish charters to our halibut resource.

As you are aware, fisheries are to be managed for the people as a whole.

Right now commercial trawlers are killing and wasting roughly twice as many halibut as sportfishermen catch each year. If the NPFMC is making decisions to limit charters because of local depletions of halibut, the first step should be to lower bycatch allocation. I think we need to answer the question of whether local depletion would continue to be a problem if juvenile halibut (that are currently being wasted) are allowed to continue their migration south and east.

It is unacceptable to limit the public when our harvest is insignificant when compared to the current commercial allocations.

Sincerely,



Randolph V Huber
5339 Lionheart Dr.
Anch. Ak. 99508

January 27, 2000

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FEB - 1 2000

N.P.F.M.C

Richard Lauber
605 W. 4th #306
Anchorage, AK 99501-2252

Mr. Lauber,

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It is unacceptable to limit the public when our harvest is insignificant when compared to the current commercial allocations.

Sincerely,

Joe Stanger

*Joe Stanger
PO Box 303
Willow AK
99688*

January 27, 2000

Richard Lauber
605 W. 4th #306
Anchorage, AK 99501-2252

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FEB - 1 2000

Mr. Lauber,



N.P.F.M.C

As you know, the North Pacific Management Council will be making decisions on placing restrictions on the halibut charter fishing fleet. I believe that a status quo vote is necessary at this time.

In several instances, the courts have found that public trust fishery resources belong to the public as a whole. If the current halibut harvest allocation does not allow the public adequate harvest to support demand, then the allocation should shift from commercial or "private" fishermen to the public until a new balance is reached.

Thank you,

Gale Stanger
PO. Box 303
Willow, Ak
99688

January 27, 2000

Richard Lauber
605 W. 4th #306
Anchorage, AK 99501-2252

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FEB - 1 2000

N.P.F.M.C

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As you know, the North Pacific Management Council will be making decisions on placing restrictions on the halibut charter fishing fleet. I believe that a status quo vote is necessary at this time.

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Thank you,

Janice Huber

*Janice Huber
5339 Lionheart Dr.
Anchorage Ak. 99508*

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

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JAN 31 2000

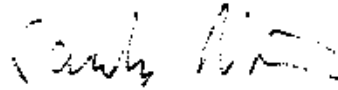
N.P.F.M.C

Dear Chairman Lauber:

I am writing in regard to the proposal before the council which would allocate some of the halibut resource to the guided charter fleet. I am in favor of the option that provides a allocation based on 125% of 1995 charter fleets catch. This allocation needs to be a percentage of the overall quota, and not a fixed amount. The commercial longline fleet cannot absorb all of the future reductions, and hope to survive.

Many in the guided charter industry are asking for a fixed allocation. They say they need the stability in their business. I don't feel that the longline fleet, which I am a part of, is any more able to survive reduced quotas and instability in their business. We all have families and crew to support, and boats and gear to maintain.

There needs to be an allocation now as continued unchecked growth in the charter industry will spell economic disaster for many longliners.



Randy Nichols
305 Islander Dr.
Sitka, AK 99835

January 26, 2000

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

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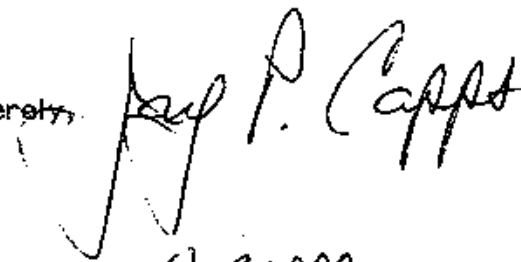
Dear Mr. Lauber:

I am in support of the Alaska Sportfish Council's point of: We do not support adoption of a guideline harvest level for Alaska's guided halibut sportfishery at this time given the small sport catch and overall abundance and harvest in Alaskan waters.

I use halibut charter boats to catch halibut, but if there were to be a reduction in bag limits I would no longer use a charter boat service because of the money you pay to charter a boat would not be worth it. I also know of several friends, tourists and locals alike who feel the same way. Not only does the recreational angler suffer but so does the charter boat business.

Why punish the recreational angler and not the commercial fishermen, when the commercial boats discards are more than the angler can ever catch.

Sincerely,



J. Capps
HCOI BOX 440
Bakona, AK.
99586

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JAN 31 2000

N.P.F.M.C

January 26, 2000

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

Dear Mr. Lauber:

I am in support of the Alaska Sportfish Councils point of: We do not support adoption of a guideline harvest level for Alaska's guided halibut sportfishery at this time given the small sport catch and overall abundance and harvest in Alaskan waters.

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Why punish the recreational angler and not the commercial fishermen, when the commercial boats discards are more than the angler can ever catch.

Sincerely,

Debbie Capps

Dear council members,

I am writing you this letter to voice my support for the commercial fishermen that will be giving testimony up there in Anchorage, here in the next few days. While commercial fishermen seem to be the minority at these sorts of decisions, I can personally guarantee that their interests and arguments represent the vast majority.

It is easy to look at this as sports vs. Commercial fishermen, but it's really not. Not at all. When coming to conclusions forget not about the families of fishermen that may solely depend on halibut abundance, while most all charter operators are very diversified. Also, lets remember the canneries and processors that for one reason or another may not be represented up there in Anchorage. These are the businesses that helped create Alaska. That's all that Sitka is! Commercial fishing and tourism, Sitka's two leading industries. I work in the commercial fishing ring, charter operators in that of tourism.

To me, that explains it. We're both involved in commercial enterprise, so why don't we both get with program?

To give the guided sports a guaranteed amount of pounds while the commercial fleet and the stock suffer decline in biomass is just not right. A) The '99 season was an all time high on biomass levels B) The stock is sure to go down, look at this years cuts C) It is not your position to predict the future.

If somehow a reasonable percentage of each year's quota is too hard to come by, and the options are limited to set amount of pounds, then I would support a decision to use 125% of the 1995 quota. I feel that this would be a safe bet, and would encourage the charter fleet to invest in the fishery, as my brothers and I have had to. Please be smart, do what is right, and it should all work out.

RECEIVED

FEB - 2 2000

N.P.F.M.C

Sincerely,



2716 NPR #33
SITKA, ALASKA
JEB MORROW

2213 S.M.C.
SITKA, AK 99835
FEB 2, 2000

HONORABLE RICK LAUDER, CHAIRMAN
NPFMC
605 WEST 4TH AVE., SUITE 306
ANCHORAGE, AK 99501

RECEIVED
FEB - 2 2000
N.P.F.M.C.

Dear Chairman Louder:

I am writing concerning the proposal before the NPFMC that deals with the allocation of Halibut to the charter fleet. I believe that the option that gives an allocation based on 125% of the 1995 charter fleet's harvest to be most appropriate. To give one user group a fixed harvest while other user groups must absorb all the quota reductions is both patently unfair and counterproductive to the need to protect the Halibut stocks.

The charter fishery should be allocated a percentage of the allowable catch, not a fixed amount.

Sincerely,
Ward Eldridge
WARD ELDRIDGE

2213 Sawmill Creek Rd.
Sitka AK 99835
Jan. 31, 2000

Honorable Rick Lauber, Chairman
NPFMC
605 V. 4th Ave. Suite 306
Anchorage AK 99501

RECEIVED

FEB - 2 2000

N.P.F.M.C

Dear Chairman Lauber:

This letter is to support the proposal before the NPFMC dealing with the allocation of halibut to the charter boat fleet. I favor the option providing an allocation based on 125% of the 1995 charter fleet's harvest. The charter boats are a commercial group, distinct from independent sport fishermen fishing for personal use, and need to be treated as such. It is not fair for one commercial group, the charter boats, to have a set allocation, while another group, the longliners, must absorb all reductions in quota.

The IFQ program has resulted in a fishery where the participants have a stake in the health of the resource, and therefore fish in a manner to conserve the resource. Putting the charter boat fleet on a similar quota would encourage them also to conserve the resource. It would also give protection to historic participants in both the charter boat and the longline fisheries.

Sincerely,
Kathryn Kyle

RECEIVED
FEB - 2 2000
N.P.F.M.C

Plitt Alaska

February 2, 2000

Chairman Rick Lauber,

My name is Patrick Cashman and I represent *Plitt Alaska*. We are a seafood wholesale company who works exclusively with fine dining restaurants and small market food service seafood wholesalers. We supply halibut for thousands of restaurants in the Midwest and on the Eastcoast. In 1999 we purchased 1.3 million pounds of Alaskan halibut through the IFQ program which was consumed by 1 million restaurant customers. The IFQ program was the foundation of our companies financial, distribution and sales strategy.

We work with hundreds of Alaskan individuals as well as dozens of Alaskan companies. *Plitt Alaska* provides millions of dollars annually directly into the Alaskan economy. We provide income to Alaskan fishermen, processors, freight forwarding companies and airlines.

Additionally, all of our competitor strategies and markets were established on the premises of the IFQ program.

We have invested millions of dollars and thousands of hours into the IFQ halibut program. Our concerns are centered on the long-term security of the halibut fishery and the economic impact any changes in the IFQ program will cause and effect.

Thousands of Alaskan families, and millions of United States consumers will be impacted by any changes made to the foundation of the IFQ halibut program.

We agree with the Halibut Coalition, thousands of IFQ participants played by the rules, yet government is now telling us at their discretion the IFQ program is Null and Void. Additionally, delinking the halibut charter harvest from abundance based management is poor public policy, gives the charter operators no incentive for conservation, and ad's to a growing list of credibility issues for the State of Alaska and Governor Tony Knowles.

Mr. Lauber, I thank you for your time and consideration.

Patrick Cashman
Cashman@xyz.net
P.O. Box 2322
Homer, Alaska 99603
907-299-0237

cc: Governor Tony Knowles and Halibut Coalition

RECEIVED

FEB - 2 2000

N.P.F.M.C

Please include in the council packet

February 2, 2000

Dear Member of the North Pacific Fisheries Management Council:

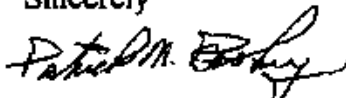
I write this letter today in hopes you will consider only one option in the Charter Halibut issue before you. I support an IFQ based upon 125% of the reported halibut data from the 1998, and 1999 Logbooks. Rumors of a one halibut per day limit would destroy my business and bankrupt me. I do not have the ability to take more than one charter per day due to the distance traveled to the fishing grounds. Those areas where more than one halibut charter per day is possible a smaller limit might be considered however I feel they could be restricted to a set limit of fish per day based upon the licensing of the vessel.

For almost 20 years I have been involved in the charter halibut fishery. I am a professional operator from Valdez, Alaska. My home, boat, the income to pay the doctor, electric bills and money to keep my home warm in the winter are dependant upon your decision. You have hard data before you showing how many fish each and every vessel is taking. This data points out just who is the professional operator and those individuals trying to find a tax loop hole, or provide themselves with a recreational hobby. I must ask you to protect what my family has worked for over the last twenty years.

I believe an IFQ is the only acceptable method of capping the industry growth, not at the expense of the existing professional operator. I implore you not to put a system in place which would allow others steal opportunity from my business. If a GHL, without an IFQ, is put into effect you are setting up a disaster for the long time professional operator.

I only ask for the same consideration you gave the commercial fisherman in establishing the commercial Halibut IFQ program.

Sincerely



Patrick M. Bookey

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FEB - 2 2000
N.P.F.M.C

NPFMC from Richard Boyce, Haines Alaska 2/2/00
Chairman Rick Lauber

I would like to support the 1997 GHL's adopted by the Council for halibut allocation.

Other proposed alternatives are at odds with conservation of the resource. Any alternative must be tied to the year's TAC, no FIXED allocations fairly account for fluctuating biomass.

If the COMMERCIAL Guided Sport fishery needs more quota, that quota should be available to them, as it is to other commercial users, by the purchase of existing blocks of share.

I have fished halibut commercially since 1976, two of my daughters also fish and own quota. Our family depends on halibut for 90% of our income, supplying Haines and Whitehorse with fresh, top quality fish.

Please insure the future of all commercial halibut fishing, retain your 1997 GHL's.

Thank you, Richard Boyce, Eleanor Boyce, Lucinda Boyce F/V Eleanor S.
Boyce Fish, Box 84, Haines, Ak 907-766-2785 Fax 505-208-1001

RECEIVED

FEB - 2 2000

N.P.F.M.C

David R. Martin
71605 Sterling Hwy.
Clam Gulch, AK. 99568
Jan. 29, 2000

NPFMC

Richard Lauber, Chairman

Dear Board Members,

The charter fleet allocation percentage must be set at 125% of their 1995 harvest. The GHL must be managed on abundance base. If their catch were not managed on abundance base, especially in years of low halibut abundance, the halibut harvest would hammer the near shore and localized halibut stocks. This would create localized and near shore stock depletions. Who would suffer? The halibut sports fishermen, subsistence fishermen, the small boat commercial fishermen, the charter industry itself, the local economies but most importantly the local halibut stocks would be fished out. This is no way to manage a fishery.

Everyone must realize that near shore areas have their own summer localized halibut populations. I'll use Cook Inlet as an example. When the localized stock is being harvested all the other halibut in 3A aren't just waiting to swim into Cook Inlet to take their place. There is no vacuum. Therefore there must be management measures to prevent this near shore depletion and to keep the charter fleet within the GHL. I agree with the management measures listed in ISSUE 2. I would suggest you also include three more.

1. The skipper and crew cannot fish or posses halibut while guiding clients.
2. The skipper and crew cannot proxy fish while guiding clients.
3. The use of downriggers is prohibited.

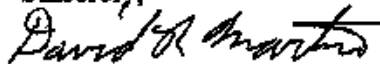
I know of some skippers and crew that take their two halibut every trip. With fifty to a hundred trips a season it is easy to be suspicious of the need for so many halibut for one person. This is not being a responsible steward to the heavily fished near shore fishery. Some of these same people complain that in recent years of having to travel much further in late summer to get halibut.

There should be no banking of halibut. You can't bank a resource that mother-nature controls. When the stocks are down everybody's harvest is down. The commercial fishermen in 3A just took a 25% reduction in their catch, which is fine because it was done on abundance based management.

I have fished halibut in 3A for 28 years. My family has recently invested heavily into IFQs. We did this because my salmon fishery has been allocated away by the Board of Fisheries and I needed a stable fishery, which the government promised in the IFQ program, to support my family. I most certainly did not buy these IFQs to give some away to the charter industry so they could expand their industry while I have to still pay the banker for the pounds they took. That's a good way to go broke.

It is time to take the bull by the horns and stop this allocation before it starts. Thousands of people depend on the jobs and food that the commercial halibut fishery provides. Thank you for your time and consideration.

Sincerely,



David R. Martin

- 907-271-2817 -

FEB ~~10~~ 1st 00

TO. N. P. M. C.

FROM KEITH GREBA - 504 MANASTERLY ST SITKA ALASKA

N.P.F.M.C.

I JUST WANTED TO ADDRESS SOME CONCERNS
ABOUT THE HALIBUT ISSUES

1) I AM A LIFE LONG ALASKAN, MY WIFE
AND CHILDREN ALSO BORN IN ALASKA.

2) WE OWN A BEO & BREAKFAST IN SITKA
ALASKA AND RUN ① ONE CHARTER BOAT -
BEEN IN OPERATION SINCE THE 80'S
THIS IS OUR ONLY INCOME!

3) I AM FOR SOME SORT OF LIMITED
ENTRY - TO STOP - THE INCREASE OF BOATS -
MAY BE TO GO BACK 3 TO 5 YEARS -

4) THERE IS ALSO SOME TALK OF IFQ'S
I HAVE A CONCERN - REASON -

I MAKE ABOUT 90 TRIPS FOR THE
SUMMER - SOME DAYS WE DON'T FISH FOR
HALIBUT, DUE TO SEASICKNESS, RUFF WATER -
YOUNG KIDS, OLD KIDS etc. THEY FISH
SALMON IN'SIDE. IF I GET OUT HALIBUT
FISHING 1/3 OF THE TIME - WE DON'T ALWAYS
GET OUR LIMIT -

THERE ARE THE "MEAT HUNTER" BOATS
THAT GO OUT AND LIMIT OUT EVERY DAY.

RECEIVED

FEB - 2 2000

WITH HALIBUT. So if a IFQ is imposed
I HOPE ITS NOT BASED ON HOW MANY
FISH THE LANDED WHEN I DO THE SAME
AMOUNT OF EFFORT, PARTICIPATION SHOULD
HAVE SOMETHING TO SAY ABOUT A FAIR
SHARE OF THE IFQ, PLEASE PUT A
FACE TO THIS LETTER WITH A WIFE & KIDS
, ITS HARD TO SLEEP A NIGHT AND I PUT
MY TRUST IN YOU TO MAKE THE RIGHT
DECISION

THANK YOU



KEITH REIF
907-747-8309

Cordova District Fishermen United

Celebrating 65 Years of Service to Commercial Fishermen in Cordova, Alaska
P.O. Box 939 Cordova, Alaska 99574 Telephone 907.424.3447 Fax 907.424.3430

February 2, 2000

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

RECEIVED
FEB - 2 2000
N.P.F.M.C

SENT VIA FACSIMILE TO (907) 271-2817

Dear Chairman Lauber,

CDFU recently established a Groundfish Division to better represent the interests of Cordova groundfish fishermen. This letter summarizes our comments regarding the Halibut GHL issue that is before the Council for decision. More detailed comments will be provided during testimony at the Council meetings.

The Groundfish Division supports the establishment of Guideline Harvest Levels for the halibut charter industry. It is critical to establish GHLs not only because the status quo results in an open-ended reallocation of a fully utilized resource but because this reallocation undermines the economic principles behind the whole IFQ program.

Due to the uncertainties about markets, allocations, and management problems associated with salmon and herring fisheries Cordova fishermen have turned to the halibut fishery because of the stability that this "rights-based" management regime promised. Cordova fishermen have taken out loans and invested in the halibut fishery because the IFQ management program provides an opportunity to develop fishing businesses that are based on the demands of the market and the rational use of time and resources. Our combined landings are a tremendous boost to processors and secondary businesses in this fisheries dependent community.

The Groundfish Division supports the original halibut charter fishery GHLs adopted by the Council in 1997, based on 125% of their 1995 catch. This GHL was both generous and appropriate since it allowed for continued growth of the charter fleets until agreeable management measures could be established.

Any increase in the halibut charter GHL above the levels adopted by the Council in 1997 would have a significant impact on Cordova fishermen who have invested in quota shares, and would undermine the financial basis for those investments. An increase in the halibut charter GHL would also have a disproportionate impact on the hundreds of Alaskans who have invested in the halibut IFQ fisheries. According to the RAM Division's 1999 Report to

September 10, 1994

the Fleet, at the end of 1998 about 600 Alaskans who were not originally issued halibut quota shares had invested in the fishery, and held about 5 million pounds of the total quota for that year. These individuals accounted for about 76% of all new entrants into the fishery.

The Federal government and the State of Alaska both have loan programs that Cordova fishermen have used for the purchase of halibut quota shares. It is poor public policy to establish loan programs and at the same time undermine the financial basis of those loans by reallocating the halibut resource to the charter fleet above the levels decided by the Council in 1997.

The Groundfish Division also supports application of the GHLs as a fixed percentage. Anything less than this strict abundance-based approach goes against the well-established and conservative management principles of the Council and the State of Alaska.

Fixed or 'stair-step' allocations could amount to significant percentages of total removals in Areas 3A and 2C under some of the scenarios presented in the EA/RIR/IRFA. This presents real conservation concerns, and exacerbates issues of local depletion.

Uncertainties about changing environmental conditions in the Gulf of Alaska (eg. the analysis of trawl survey data by Paul Anderson, NMFS), and uncertainties about projections of the halibut biomass in the future also illustrate the need for strict abundance-based management. While the IPHC continues to believe that future changes in the biomass will be small, their confidence intervals in those projections are very wide, and catch limits have just been reduced by 26% in 3A and 20% in 2C.

The EA/RIR/IRFA for the halibut GHL issue describes a number of reasonable management tools that will keep the charter industry harvest levels within a GHL, while at the same time providing the stability that the charter industry needs. These management tools can reduce the charter industry's harvest rates at the margins, without drastically impacting their ability to thrive as businesses.

Sincerely,



H. Daniel Hull, Co-Chairman
CDFU Groundfish Division



UNITED FISHERMEN OF ALASKA

211 Fourth Street, Suite 110
Juneau, Alaska 99801-1172
907/586-2820
Fax: 907/463-2545
E-Mail: ufa@alaska.net

February 2, 2000

RECEIVED

FEB - 2 2000

N.P.F.M.C

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

Dear Mr. Lauber,

We urge you to take final action at your February Council meeting and uphold your 1997 GHIL decision to allocate halibut between commercial setline fishermen and the guided charter fleet in IPHC areas 2C/3A.

Your 1997 decision was a generous compromise to the guided charter fleet since it gave them their historic high and allowed 25% for growth while the charter fleet had time to get their harvest under control.

We appreciate the halibut charter fleet's concerns about stability in marketing and scheduling. We understand the Council's intentions to attempt to maintain a traditional season with a minimum of in season management actions. However, everyone involved in making a living from the sea and a renewable resource must understand the risks and uncertainty involved. It is a delusion to perpetuate the myth that the charter fleet can have an allocation that is not directly linked to the health of the resource. Therefore we are opposed to granting the charter fleet a fixed "pound or number" allocation.

We would also like to express our concern about the "economic" information presented in your EA/RIR/RFA public review draft. Your staff has included several warning about the limitations of the information presented, however the sheer volume of paper presented to support the economics of the charter side is disturbing. We urge you to carefully consider the social and economic information being presented by commercial fishermen, coastal communities, and Native organizations so that you have a better understanding of the economic impacts. Just because more research has gone into the recreational fishing does not mean you have a balanced picture of the economic consequences of your decision.

The GHIL must be coupled with effective management measures to keep the charter fleet within the GHIL. NMFS need not shy away from pre-announced bag limit changes. In season bag limit changes are common in the Southeast Alaska Chinook recreational fishery and a season limit of four Chinook for non-residents has not had significant

MEMBER ORGANIZATIONS

- Alaska Longline Fishermen's Association • Alaska Trollers Association • Commercial Area "M" Fishermen
- Cook Inlet Aquaculture Association • Copper River Salmon Producers Association • Cordova District Fishermen United
- Kent Peninsula Fishermen's Association • Kodiak Regional Aquaculture Association • Kodiak Salmon Association • North Pacific Fisheries Association
- Northern Southeast Regional Aquaculture Association • Northwest Samogara Association • Petersburg Vessel Owners Association
- Prince William Sound Aquaculture Corporation • Puro Seino Vessel Owners Association • Seafood Producers Cooperative
- Southeast Alaska Salmon Association • Southern Southeast Regional Aquaculture Association
- United Cook Inlet Dred Association • United Southeast Alaska Gunnetters

impact on the charter industry. A review of the Dec 1999 Gulf of Mexico Charter Vessel Moratorium literature on charter permits for reef fish and coast pelagic fish, indicates that NMFS has the ability to change bag limits both up and down as the health of the resource dictates.

We appreciate it that you have included some comments on the ripple effects of the closure of Glacier Bay proper to commercial fishing. This is but one example of the incremental government actions that can have devastating social and economic effects on fishermen and their communities. Many fishermen have diversified so they can maintain a viable business and it needs to be understood that even a small change in one fishery could cause the financial destruction of a fisherman's business. As part of their diversification, a significant number of fishermen have invested heavily in the IFQ system established by the Council; they need a stable allocation so they can make reasonable economic decisions.

United Fishermen of Alaska is a statewide organization comprised of 23 fishermen's groups representing a significant number of Alaska's commercial fishermen.

We appreciate your consideration of our comments and those of the fishermen, organizations, and communities impacted by your decision.

Sincerely,

Thomas M. Gemmell

Thomas M. Gemmell
Executive Director

Petersburg Vessel Owners Association

P.O. Box 232
Petersburg, Alaska 99833
Phone (907) 772-9323 Fax (907) 772-4495

RECEIVED
FEB - 2 2000
N.P.F.M.C.

February 2, 2000

Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: C-1: Halibut Charter GHZ

Mr. Chairman and Members of the Council,

We were going to send a postcard, but decided to write you instead. Other than the IPHC 2000 catch limits, there is no great change in the fundamental issues of this agenda item. The Council will be taking Final Action on an issue that was before you since the last century (1993). In accordance with the Paperwork Reduction Act from the Department of Redundancy Department, we will try to keep our comments brief and no more repetitive than normal.

Bear in mind that the action should address the key features of the Council-adopted original problem statement, i.e. "open-ended reallocation". A compromise GHZ was already been passed in 1997, but was lacking essential management measures. This is the main focus of this exercise.

NECESSARY ACTIONS

1.) Status quo is not an option. Unless proponents of this alternative can stop the passage of time, this alternative should not be considered. It does not address the problem statement. The Council will no doubt receive testimony that the GHZ is not necessary since the charter catch is not increasing. This

same testimony was given in 1993 and the catch has since then doubled. The Council will also receive testimony that a GHL is not necessary and a moratorium will suffice. In examining Board of Fish committee reports, it is stated in regards to a BOF proposal for a moratorium, that proposal would be withdrawn if the GHL went away. It is not a chicken or egg argument. Without a GHL there is no incentive for the charter fleet to self-impose management or regulations. In short, the Council must lay the egg.

2.) Abundance-based GHL: The Council has already passed this in 1997 at a level that represented a fair sharing compromise. Abundance-based best addresses the directive in Magnuson-Stevens in regards to fishery management plans, "...allocate any harvest restrictions or recovery benefits fairly and equitably among the commercial, recreational and charter fishing sectors in the fishery." As passed in 1997, a percentage of the combined commercial quota plus charter catch accommodates this in a fair and equitable manner. A fixed harvest or a range with a floor does not. A three year rolling average may be appropriate with a percent GHL, but we do not support that if it means it will be three years before any action is taken. For example, if adopted for the 2001 season, the three year running average would be 1999, 2000, 2001 and not waiting until the 2004 season.

3.) GHL shall be based on 125% of 1995: The use of 1998 numbers is problematic given the wide variance in average weight found only in 2-C and only in 1998. Additionally, comparisons of creel census to logbooks indicate a 8% - 31% overstatement of catch and effort in logbooks in selected ports in 2-C. The 1995 catch plus the 25% allowance for growth is a fair sharing compromise and put everyone on notice, as published in the Federal Register.

4.) Pounds or fish: The biological managing agency, the IPHC, manages in pounds. Bag and possession limits are done in fish. IFQ's, in which charterers have expressed interest, are in pounds. This is not an insurmountable difficulty. However, until it can be demonstrated how these "currency exchanges" can be done without disadvantaging one party or another, we opt for the common denominator of pounds.

5.) Charter allocation prior to bycatch deduction: The combined commercial and charter catch should come after bycatch, wastage, personal use, subsistence and unguided sport are deducted. Very little of the bycatch originates in the IFQ longline fleet. For all commercial users (including

charter), bycatch comes off the top. At present there is no deduction for incidental mortality from catch and release in the charter fleet. Using a ten percent mortality rate applied to the logbook number of fish released this would be a mortality of 400,000 pounds for 2-C/3-A in 1998.

6.) Management Measures: The point of this exercise was to have a "tool box" of management measures. Charterers had two years to fill the "tool box" but seemed to have stocked it with unessential items. Bag limits is presently the only effective tool and it did not come from the GHL Committee. The addition of temporally spaced bag limit changes would be a meaningful addition to the toolbox, i.e. pre-season announced changes in bag limits inseason.

7.) IFQs for Charter Boats: We support this concept but as a separate action. The GHL will provide the impetus to bring this to fruition. On the positive side, such a program would allow the charter industry to increase its allocation, without an accompanying overall loss of equity in the longline sector. An other attribute is that such a program would mean that the issue of allocation level would not have to be debated ad nauseum every year.

Please move forward with Final Action in a responsible and fair fashion.
Thank you.



Gerry Merrigan
Director, PVOA

Steve Fish
P.O. Box 6448
Sitka, Alaska 99835
(907) 747-6042

RECEIVED
FEB - 2 2000

N.P.F.M.C

Honorable Rick Lauber, Chair
North Pacific Fisheries Management Council
Anchorage, Alaska
Re: Halibut Guided Sport

Dear Chairman Lauber,

I am a commercial halibut and sablefish longliner from Sitka and I am writing to ask you to stop the open-ended re-allocation of halibut from commercial longliners to the commercial guided sport (charter) sector. The longliners have shown a willingness to give, allowing for limited continued growth of the charter fleets and, with good management and a willingness on the part of the charter boat sector, stability and continued ability of the charter businesses to plan and book clients from one year to the next.

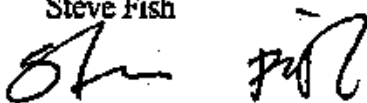
This issue has been burning long enough. It has caused much uncertainty in both the longline and the charter boat industries; as well as all the attendant posturing, hyperbole and hard feelings. Both sides have benefitted from the dialogue in the meantime, there is more and better data than when we began this process seven years ago, and more options on the table representing the needs and desires of both sides. For the stability of both industries which together represent a large block of the Alaskan economy, this issue must see final action at this meeting.

The GHL, used as an upper limit to the guided sport take should be related to abundance and fluctuate accordingly. The council should adopt a fixed percentage allocation as in issue 1, option 1 based on 1995. It would be unfair to fix a percentage based on 1998 which is an anomalous spike in the charter harvest which is unverifiable and for which no one has an explanation (Calvin Blood, IPHC Report of Assessment and Research Activities 1999). If a range or stair-step is considered with triggers for implementation as in issue 3, option 2; the triggers should not let the combined charter and setline TAC fall more than 10% before implementation of stair steps which should be equivalent to changes in the CEY calculated from a base year of either 1995 or 2000.

It is crucial to link the charter allocation to abundance of the resource. The guided sport industry is a halibut user group with significant impact on the resource and on other users. It would be a dangerous precedent and sure sign of biased management to disconnect the charter segment from its responsibility to resource abundance. I don't believe that either the State of Alaska or the Council wants to send the message to the public, the owners of the resource, that one user group cannot afford to respond to a downward trend in abundance with some level of flexibility in management.

It is time to act. I urge you to reaffirm the GHL approved by the council in 1997 and adopt in-season management measures to assure that the charter catch does not exceed reasonable limits.

Thank You
Steve Fish



Goodhand Charters

Of Valdez and Prince William Sound

P.O. Box 90 Ester, Alaska 99725 - Phone 907- 479-5562 - Fax - 479-0395

E-mail glaciers@alaska.net, web site www.goodhand.com

Chairman Rick Lauber
NPFMC
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501 - 2252

RECEIVED

FEB - 2 2000

N.P.F.M.C

Dear Mr. Lauber

I have represented the Valdez Charter Association businesses ever since the Charter Halibut issue came up in 1993. I was on the GHF committee for the NPFMC, the Guide licensing task force for the Governor, and I am a board member of the Alaska Sportfish Council. Sometimes my charter constituents have given me "marching orders" that are contrary to my personal belief, and I represented those views to the best of my ability, anyway. Well, my mother was disappointed but not surprised that I didn't turn out to be a rocket scientist.

I find that my charter association has been diluted by what I would term as "speculators" or "hobby" companies. I have polled them about these upcoming issues, by e-mail to many, and by phone to others. When you receive an e-mail or something in writing, you can review it later to absorb the content fully. Well, that's what I am writing to you about.

One of these typical e-mail replies, in particular, referred to the why "WE" are in the charter business, and I quote, "...for pleasure, tax wright-off, boredom, or escaping the wife"... In addition to that, this individual eluded to "...larger operators spending 3 to 4 months in sunny climates..." Wish I could. Some of these "hobby" operators, who are the most outspoken, are government employees and currently enjoying wages that I envy let alone the future retirement and "bennies." Some of these folks are going to be double dippers, and they earned it so more power to them. On the other hand, my business investments are my sole retirement.

In addition, this comment is all too common - "...when I retire, I will expand into a full time charter..." My thought is, where are these fish or opportunities going to come from under a GHF? The only place I can come up with is out of what numbers I have helped create. This is the last straw. I have to speak up for what I feel is right for the Professional in the charter business, because we provide public access to the halibut sports fishery.

My business, and many other older professionally established businesses, wish we needed the "write-off", and aren't bored, but nervous. We are involved in these issues every day. I, myself, enjoy this business because I work with my wife and sons, and 2 other employees. In the past, my business had three generations working together until 1994 when an accident put my father on the sidelines.

Further, this charter business is the largest portion of my income. I market, plan, I have loans, 2 children going to college, medical concerns, mortgages, and, this business is my sole retirement.

I repeat, what I make of my business is my ONLY retirement, as sad as that is looking under a GHL. My business has never been a "hobby." When my boat breaks I literally work around the clock to get underway again. My average day is about 16 hours long.

Well, I have complained long enough, so to the point. The GHL is a bad management tool, cut and dried. If we are going to have a GHL, it needs to include a 2C and 3A area wide moratorium, based on the control date of 6/98. AND the '98 and '99 log books, so a business can receive that harvest as the "historic catch," (unless a method of purchasing fish is installed, or some form of a banking program). Then a LAMPs process to address industry drift, Sport Catcher Vessel Only Areas, gear conflicts and other concerns.

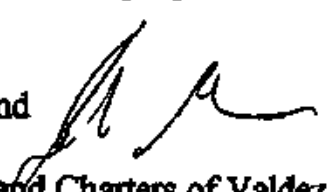
The best, and preferred, method that I have looked at is the IFQ program that Bob Ward is outlining. We have log books that are verifiable for '98 and '99, and if there was anything going on from what I have heard, it is that a few people have been UNDER reporting, because they felt the info would be used against them.

I am one who would not get my full potential from an IFQ because I was trying to diversify by trying to do other forms of chartering, which in fact, did not work too well. The IFQ at least would give me what I have earned, and I can deal with that.

I do feel that the Council should go to 125% of these figures, as in the past have been so generously offered. This would allow for growth or errors in the system, and to get it off the ground.

This would be a much better system than a GHL system that erodes into less opportunity for the public, and also takes opportunity from the professional business people who are vested in this fishery.

Thank You,
John Goodhand



Goodhand Charters of Valdez
P.O. Box 90
Ester, Alaska 99725

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Feb 2 1999 3 P.02

FEB - 2 2000

Resolution 00-2

A RESOLUTION IN SUPPORT OF THE SUBDIVISION OF AREA 3A - LOWER COOK INLET SPORT AND CHARTER HALIBUT FISHERY

N.P.F.M.C

- WHEREAS,** the need to distinguish Kodiak Island as a separate entity from Area 3A, the Lower Cook Inlet Sport and Charter Halibut Fishery, is essential in ensuring all Alaska residents receive fair and equal treatment with regard to resource appropriation, and
- WHEREAS,** 261 active logbooks for the Lower Cook Inlet 1999 season show a total of 40,510 client fishermen taken out in comparison to 74 Kodiak logbooks of 10,470 client fishermen, and
- WHEREAS,** the Kodiak sport and halibut charter fishing industry season begins well after the Lower Cook Inlet area season and, with restrictions on all of Area 3A, and the high probability of Area 3A reaching its guideline harvest levels just as Kodiak is approaching its peak season, the Kodiak season would be restricted and/or end before it even gets underway, and
- WHEREAS,** the high cost of travel to Kodiak Island continues to restrict and deprive Kodiak from the sport and charter boat growth experienced by the Lower Cook Inlet, and
- WHEREAS,** Kodiak's large continental shelf east of town is not fished by other communities' charter fleets and should, as a result, not be linked to the pressures of fish caught by the larger Lower Cook Inlet sport/charter fleet, and
- WHEREAS,** the Kodiak Fish and Game Advisory Committee previously adopted and unanimously passed Proposal #425 recommending the subdivision of Sub Area K from Area 3A, Lower Cook Inlet, to the State Board of Fish, and
- WHEREAS,** the inclusion of Kodiak Island into Area 3A, Lower Cook Inlet, would create serious economic consequences to both the Kodiak sport/halibut charter industry and community as a whole,

NOW, THEREFORE, BE IT RESOLVED that the KODIAK ISLAND CONVENTION & VISITORS BUREAU Board of Directors urges the North Pacific Fishery Management Council to segregate Kodiak Island from Area 3A as one separate management sub area when considering controls for implementation in the growing Lower Cook Inlet sport and charter boat industry.

PASSED AND APPROVED BY THE KODIAK ISLAND CONVENTION & VISITORS BUREAU THIS EIGHTEENTH DAY OF JANUARY 2000.

Signed:


Murphy Fernald
President, Board of Directors



Attest:


Pamela Foreman
Executive Director

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FEB - 2 2000

February 2, 2000

N.P.F.M.C

Drew Sparlin
37020 Cannery Rd.
Kenai, AK 99611
907-283-4095

Dear Chairman Lauber and Council members,

I have been a resident Commercial fisherman of Halibut, Salmon, and Herring for more than 35 years. My reason for this short letter is to encourage you folks to pass a G.H.L. on the expanding Charter fishery that is allowed to operate without biological constraints. The option that uses the harvest numbers of 1997 would be my preference.

Although the passage of this may not address the stock depletion issue that occurs in near shore waters by the majority of the Charter fleet. The Recreational fisherman has seen a declining opportunity for success later in the season as result of the pressure applied by a Concentrated Charter effort.

I plan to give personal presentation at your upcoming meetings if the roads between Kenai and Anchorage are cleared in time.

Please pass a G.H.L. based on abundance!

Thank you, Drew Sparlin

North Pacific Fisheries Management Council
Federal Building
Via Fax

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N.P.F.M.C

Comments Re: Halibut GHL

Ladies and Gentlemen:

After seven long years of trials and tribulations, lies and innuendoes, threats and counter threats, reports and more reports, studies and more studies, the North Council are finally at the time certain when it needs to make some decisions.

First let's not kid ourselves, the actions to be taken this week have nothing to do with biology or the need for conservation. Its simply a way to keep as much of a common property resource (a resource "owned" by all the people) in the private sector.

It has been quite an education watching this Council trying to make these decisions look like they were made on some sort of rational basis. Let's call a spade a spade— this is an allocation issue. In this case, the allocation is not between differing types of commercial fishing vessels but between the haves and the have nots; the ones with control and the outsiders. Because the Council is moving forward on the notion that the guided sport fishery is a growing monster, I suggest that the Council take advantage of some of the procedural work done on the State level by the Board of Fisheries. The Board has a review process that it goes through whenever it is asked to make decisions on new or expanding fisheries. Hey, check it out—it may help your process.

By now you can guess that I am not the only one in the large majority that hate to see any changes to the way halibut fishing is currently mismanaged. It is far from perfect but is most definitely more palpable than any of the options staff has suggested. First a few years ago, the Council took away tens of millions of pounds of fish from the people and gave it to a special interest group. They called it IFQ's. They committed to respect the traditional recreational fishing areas which are relatively near shore because of day trip distance limitations. During the past few years, if a longliner saw a few recreational boats fishing a spot, it is just about a guarantee that it will lay down its lines PDQ.

The staff's report to the Council is a well written rehash of selected data to support what the Council is expected to need for documenting its decisions. Over the past few years both sub committees (SSC and AP) have said that information in the staff reports were inadequate. The Council had ignored these opinions. The economic data in the report looks like it was lifted from an foreign planet. On a strictly ex-vessel basis..... How can a \$2-2.50 per pound commercial fishery value be worth more than a \$150 charter that might catch 30

pounds of fish*** that's \$5.00 per pound. If one could recreationally fish and travel as cheaply as the report states, could staff tell me where I'm going wrong?

The Council has repeatedly called the charter operators akin to commercial fishermen. If that is so, then they must be catching the fish because that's what commercial fishermen do. They must be providing sightseeing transportation for a price. Therefore it follows that the passengers are not fishing but simply aboard for the ride. Further, it might mean that they don't need fishing licenses. How about asking the State managers what this would do to the Department of Fish and Game's revenues.

Speaking of revenues and costs, who is going to pay for the costs of implementing and monitoring whatever new rules you guys decide on? The way I figure it, the costs need to be borne by the group that will benefit from the decisions..... So it looks like ALFA needs to come to the table and tell us how its going reimburse State and Federal agencies for the additional costs of the management changes about to be enacted. How much per pound or per permit are they willing to pony up to assure themselves of this additional windfall?

The Department of Fish and Game has presented a management plan that provides the managers with some guidelines and harvest ranges for managing the rapidly expanding (?) recreational fishery. This plan needs to be looked at as a viable alternative to the suggestions in the staff report. This proposal was brought forward earlier by fishery managers who, unlike the Council, are experienced in managing recreational fisheries.

One should also look at the new management methodology recently proposed by the Homer Charter Association. It could be the long term solution. The proposal as I saw it certainly needs some work but is a decent initial stab at a management plan that is rational.

By the way, I am not a charter operator or a customer. I fish with my own small boat and am very concerned that the next challenge for the recreation fisherman will be to stop ALFA from stealing the rest of the non-commercial halibut share. You can call it sport fishing but I call it fishing to catch fish to feed my family --just like you commercial fishers fish to sell fish and feed your families.



Phil Cutler
Disappointed Sport fishing advocate

NPFMC

Mr. Richard Lamber

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FEB - 2 2000
N.P.F.M.C.

Sir,

I'm writing to express my concerns about sportfishing for halibut. I am an author and lecturer on that subject.

① Reduction of the daily bag limit from 2 to 1 fish would be too drastic. It would effectively kill the charter

industry. If conservation of stocks in a local area (Precedent = SITKA Sound) ^{is the concern,} I'd

favor an annual limit such as the 5 King Salmon / year quota in Cook Inlet.

The 2 fish per day was an arbitrary figure derived by a commercial fisher

dominated boards. This board voted to leave fish uncaught by its harvest quotas in recent years of plenty, yet the daily bag was not increased for sport anglers. While one could argue that leaving biomass is insurance against any miscalculation of the total, it also seems to be a price supporting mechanism under supply and demand economics.

The effort to load the burden of projected lower stocks of fish on the backs of sport anglers is draconian at best. It is the easy way out to poison

(3)

the smallest player who has no voice to directly affect the game, since he has no seat at the table to vote.

Why don't you saddle some of this on the longliners and trawlers whose bycatch alone equals the total annual sport catch in Alaska?

That would be fairer and more in keeping with the letter and the spirit of the Magnuson act.

Sincerely,

Peter Hardy

**PETITION
AGAINST PROPOSED HALIBUT FISHING LIMITS**

January 2000

Re: North Pacific Fisheries Management Council/
Anchorage, Ak
& Natl. Oceanic & Atmospheric Administration/
Washington D.C.

We, the undersigned, stand firm in our belief that the proposed Halibut Fishing Limits for Charter Operators are unfair and unconstitutional to the rights of the private, Recreational/Sports Fisherman and also to the General Public as Providers of their Households, because this proposal will effect private citizens, as well. As Alaskan residents, many of us long-time Alaskans, we feel that our Rights should be recognized, which are not included in the "Commercial Fisherman's" rights. Specifically, we feel that limiting the Charter Operators Halibut catch to "one" Halibut will be harming not only our Tourist trade, but the private sector that utilizes the Charters.

Name:

Address:

Kris Rasey

8161 Clear Haven Ct.
Anchorage AK 99507

LEON HARTMAN

8528 BOUNDARY AVE UNIT H-6
ANCHORAGE, AK 99504

JIM JANSON

17340 MONTORZI
EAGLE RIVER AK 99577

Irene Hunni

Greg Hartman

18235 N. Parkview, E.R. AK 99577
17520 Northgate AK. Eagle River AK 99577

LEE CARPENTER

17010 Lynne Dr Eagle River AK 99577
20644 RAVEN DR. EAGLE RIVER AK 99577

DICK CENTER

TED DIRKES

20311 Eagle River Rd. E.R. 99577

WAYNE WAMLEY

Box 875635 WASILLA, AK. 99687

George R. Ritz

16436 DAVIS ST. EAGLE RIVER, AK
99577

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Name:

Address:

Pete Halverson	Jack Gates	Chugiak AK
John Keef	Jack Gates	CHUGIAK, AK
Fred Walling	Jack Gates	Eagle River, AK
JW TRESOTT JR		CHUGIAK, AK
Kandi Trescott		Chugiak, AK
Jack M. Hutes		CHUGIAK AK
Halley Jones		Peters Creek, AK.
Gene D. Rizzo		Chugiak, Ak
Chris Cornelio		Chugiak, AK Chugiak, AK
Saxdea Mortensen		Chugiak AK
Ty Shy		19936 weeping Birch Chugiak AK

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Washington D.C.

PAGE 2

Name:

Address:

Virginia Shandy
John Penn
Shirley Lemington
Ann A. Hyslop
Dustin W. Rother
Catalyn Kennedy
Brenda Brown
Michael J. Tracy
Rita Jackson
MATT COOL
John Mathison
Tammy Resin
MIKE BERNIER
TIM MORTIMER
Tony Unspeder
Roger Thomas
Joseph Rannetter

19936 Weeping Birch Chugiak 99567
24046 Pillow Circle 99567
24046 Pillow Circle 99567
PO Box 771701 ER. AK. 99577
PO Box 772078 ER. AK 99577
P.O. Box 670922 Chugiak, AK 99567
PO Box 670726 Chugiak, AK 99567
PO Box 671256 Chugiak AK 99567
P.O. Box 670177 Chugiak AK 99567
PO Box 770382 EASLE RIVER AK
4061 Kathai Dr Eagle River AK 99577
P.O. Box 670490 Chugiak, Ak. 99567
P.O. Box 1685 CHUGIAK, AK 99567
PO BOX 672155 CHEGIAK AK 99567
P.O. Box 122 G. L. H. & Co.
PO Box 671751 Chugiak AK 99567
P.O. 672522 Chugiak AK -567

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Anchorage, Ak
& Natl. Oceanic & Atmospheric Administration/
Washington D.C.

PAGE 3

Name:

Address:

Tim Linber

PO Box 671631 Chugiak Ak 99567

Bernice Swanson

21533 Rock Ptarmigan Chugiak AK 99567

Brian Rogers

21533 Rock Ptarmigan Chugiak AK 99567

GEORGE DEWEY

11515 BUFFALOIS EAGLE RIVER 99577

Dan J. J.

27329 Deer Park Dr Chugiak AK 99567

Jo Rutter

22914 GINA Circle CHUGIAK

Ted Williams

PO Box 672292 Chugiak AK 99567

Ron Gilson

22006 CLOVERLEAF RD Chugiak, AK 99567

Gary Ainsworth

9033 W. Parkview, Eagle River AK, 99577

Larry Rutter

18907 Birchwood L.P. Chugiak AK 99567

TRACY RUTTER

18907 Birchwood Lp Chugiak AK 99567

Michael Muthern

PO Box 771874 EAGLE RIVER AK 99577

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Name:

Address:

Charles Valencia

10207 VFW Rd Eagle River

BARRY ANDERSON

P.O. Box 875471 WASILLA AK

Don Bagley

17818 NER Ln Eagle River

Loydale McDonald

P.O. Box 670947 Chugiak AK 99567

Kevin Brown

P.O. Box 2132 Chugiak AK 99567

Dan Neuschwander

P.O. Box 671305 Chugiak AK 99567

Mark Herworth

16906 MERCY DR. #A

Paul Johnson

16617 Mercy Dr #B

Carl Bond

P.O. Box 671961 Chugiak AK 99567

Karl Smith

P.O. Box 670687 Chugiak AK 99567

P.O. Box 773502 E.R. AK 99577

Bill ...

P.O. Box 677549 ... AK 99567

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January 2000

Re: North Pacific Fisheries Management Council/
Anchorage, Ak
& Natl. Oceanic & Atmospheric Administration/
Washington D.C.

PAGE 2

Name:

Address:

Charles R. Cargel
and Lester

HCO2 BOX 7288 PALMCA. AK 99645
PO BOX 773471 ER AK 99577

Mike Hurst

PO Box 771194 EAGLE RIVER AK 99577

9808 CHATHAM CIR. ER. 99577

Robert Mann

20144 Loughlin St Chugiak AK

Andy Belford

9331 West KANAGA Loop, 99507

Theron VonBeaumont PO Box 212771 Anchorage AK
99521

Wayne Gysman

9833 Eagle River Lane. Eagle River AK

John E. Brown

17343 SANTA MARTA DR
99577

Eagle River 99577

Halibut Guideline Harvest Level for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to adopt the 1997 Guideline Harvest (125% of the 1995 charter boat harvest) as an allocation between charter boats and IFQ holders. The allocation should be based on the historic catch level established in 1997 and should be a percentage of the combined commercial and guided sport halibut harvest so that the charter harvest is linked to the abundance of the halibut resource. The commercial harvest of halibut is critical to our jobs, families, and communities. Furthermore, we urge the Council to adopt effective management measures that restrict the guided sport sector to the GHL allocation.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
J. CARLOS Schwantes	505 Andrews St. Sitka AK. 99835	4	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
JOSEPH Schwantes	503 Andrews St. SITKA, AK 99835	1	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker

N.P.F.M.C.

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER	
SCOTT K. SALINE	BX 3183 SITKA ALASKA 99835	(3)	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker	
C. D. Sandberg	406 Hirst Apt. A Sitka AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker	
Ben Contag	Hidden Falls Hatchery		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker	N.P.F.M.C.
Steve Kost	PO Box 1391 SITKA AK 99835		<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker	
ED LATTY	617 Kathleen #E 33 Sitka AK 99835	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker	
Neil Hull	102 KRESTOF DR SITKA	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker	

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Charlie + Melody Hazel	609 ETOLEW SITKA AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
ROBERT & SUZIE FRENCH	1919 DODGE CIRCLE	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Stan Pata	107 R.W.C. SITKA, AK 99835	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
JOEL PERRO	507 SMC SITKA AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Dennis A. Ane	29 KB Apt. 910 HPR SITKA, ALASKA 99835	6	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
VERN WAKEFIELD	PO BOX 918 SITKA AK, 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker

DATE _____

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Dylan Haley	500 Lincoln #A Sitka AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Robert P. Leighton	P.O. Box 2001 Sitka, AK 99835	4	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Gary May Sr.	301 Marine St. Sitka AK 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Pat E. Kilman	445 Kirkman Way Sitka, Alaska 99835	1	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
ROBERT WATSON	P.O. Box 6201 SITKA AK 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Maloo Simpson	2811 HPR #C Sitka, AK, 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Mark & Reid	Box 1201 Sitka AK.	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Anthony J. Navey	BOX 2495 SITKA, AK	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Minda Hittchell	P.O. Box 2953 SITKA	6	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Vidal R. Quintana	P.O. Box 931 Sitka, AK	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input checked="" type="checkbox"/> Processor worker
Wm. Lewis	Bx 106 Sit. AK	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker

DATE _____

Page _____

Halibut

Charter Fishery in Area 2C/D

We, the undersigned, urge the North Pacific Council to adopt the 1997 Guideline Harvest (125% of the 1995 charter boat harvest) as an allocation between charter boats. The allocation should be based on the historic catch level established in 1997 and should be a percentage of the combined commercial and charter halibut harvest so that the charter harvest is linked to the abundance of the halibut resource. The commercial harvest of halibut is critical to our jobs, families, and communities. Furthermore, we urge the Council to adopt effective management measures that restrict the commercial sector to the OHL allocation.

Fran Moore

DATE

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NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Robin H. Trueman Robin H. Trueman	204 B Lake St, SITKA, AK 99835	3	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Steven R. Edenshaw Steven R. Edenshaw	100 Andrew Hope Sitka AK. 99835	5	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Roger A. Barr Roger A. Barr	2626 Lawson ton SITKA AK 99835-7514		<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
Larry Stephens LARRY STEPHENS	2309 HPR #19 SITKA, AK 99835	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Processor worker

JE _____

Page _____

Approximately 8 individually signed copies of this form letter were received. Individual copies can be reviewed at the Secretary's desk in the Council meeting room.

Richard Lauber, chairman
NPFMC
604 West 4th Ave. Ste 306
Anc. Ak 99501

RECEIVED

JAN 18 2000

N.P.F.M.C

STATUS-QUO ON HALIBUT CHARTER BOAT GHL.

- * Charter Operators are not commercial fishermen!
- * Sport/Charter fishermen have NO representation on the NPFMC!
- * Halibut are a PUBLIC OWNED resource!
- * Commercial fishermen WASTE more than the total charter boat Sportfishermen harvest!
- * Recreational fishing's economic value SUPRASSES the commercial fishing economic value in the U.S.!
- * VALUE ADDED benefits of Recreational fishing is 40 TIMES that of commercial fishing per pound of product!
- * There are 470,000 licensed Sportfishermen in Alaska and only 3,570 licensed IFQ commercial fishermen in Alaska!
- * Sportfishing is the SECOND MOST POPULAR outdoor activity in the U.S. (second only to swimming)!
- * 25% of the U.S. population are involved in Sportfishing!
- * SPORTFISHERMEN WANT STATUS-QUO ON CHARTER BOAT GHL!

WE NEED SPORTFISHING REPRESENTATION NOW ON THE NPFMC AND IN ALL ALLOCATION DECISION MAKING!

THANKYOU!

Name

ADDRESS

Phone

Signature

John Waddell
Casey Cipton
3695 Lake St
 Homer AK 99603
907 2350105

Casey Cipton
John Waddell

Approximately 9 individually signed copies of this form letter were received. Individual copies can be reviewed at the Secretary's desk in the Council meeting room.

Dear Chairman Lauber, North Pacific Fishery Management Council

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

I am a customer at several restaurants in Anacortes and the surrounding area. I purchase approximately twenty halibut meals per year. Without a steady supply of commercially caught halibut at reasonable prices, most consumers will not have access to this fine seafood. Halibut plays a prominent role most restaurant menus and is highly valued by consumers.

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

Your consideration of this letter is appreciated. Commercial fishing benefits many people and businesses in our local community.

Sincerely,



Robert S. Johnson

1/30/00

RECEIVED
JAN 31 2000
N.P.F.M.C

Approximately 5 individually signed copies of this form letter were received. Individual copies can be reviewed at the Secretary's desk in the Council meeting room.

Mr Richard Lauber
Chairman, NPFMC
605 W Fourth Avenue, #306
Anchorage, AK 99501

James E. Clark, Jr.
113A Gulkana Ave
Fort Richardson, AK 99505

RECEIVED

JAN 31 2000

N.P.F.M.C

January 20, 2000

Dear Mr Lauber,

The North Pacific Fishery Management Council will soon vote on a measure that will change the daily limit of halibut sport-fisherman utilizing charter services in Alaska from two to one fish. Cutting the bag limit in half will cause the fisherman to target larger fish in order to realize better value for the money spent chartering a boat. As you know, the larger halibut are always females. Targeting the females will only further help in the depletion of the species.

I am opposed to this measure and urge you to vote negatively on the matter. The halibut are a public resource that are here for the benefit of all Alaskans.

Sincerely,

James E. Clark, Jr.
James E. Clark, Jr.

Approximately 328 individually signed copies of this form letter were received. Individual copies can be reviewed at the Secretary's desk in the Council meeting room.

December 14, 1999

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

RECEIVED
JAN 31 2000
N.P.F.M.C.

Dear Chairman Lauber,


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

I operate a restaurant in the Chicago Land area. Annually, we purchase hundreds of pounds of halibut and serve many hundreds of consumers meals per year. Without a steady supply of commercially caught halibut at reasonable prices, most of our customers will not have access to this fine seafood. Halibut plays a prominent role on our menu and is highly valued by customers

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

Sincerely,

Herrington - Banquets
15 River Ln.
Geneva, IL 60134


Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
governor@gov.state.ak.us

Note: please send the Governor's copy to the Halibut Coalition and we will deliver it for you.

Approximately 51 individually signed copies of this form letter were received. Individual copies can be reviewed at the Secretary's desk in the Council meeting room.

12/31/1999

Honorable Rick Lauber, Chairman
NPFMC
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

RECEIVED

JAN 06 2000

N.P.F.M.C

Dear Chairman Lauber:

I am writing concerning the proposal before the NPFMC that deals with the allocation of halibut to the charter boat fleet. I strongly favor the option that provides an allocation based on 125% of the 1995 charter fleet's harvest. A set allocation for one commercial group - charter boats - while the other commercial group - long liners - absorb all reductions in quota, is a sure formula for the demise of the commercial halibut long line fleet.

The IFQ program as implemented by the council has resulted in an orderly fishery. The ability to buy and sell quota has resulted in substantial investments by many of the participants in the halibut IFQ fishery. A council action that reduces quota to the long line fleet for reasons other than conservation would create financial hardship to the fleet, and in many cases, the loss of a family business.

There should be an allocation for the charter fleet, but it needs to be made in a way that is not injurious to historic participants.

Sincerely,

Charles C. Hawkes, Jr.

F/U Mixie

P.O. Box 93

Craig, Alaska 99921

Have commercially fished Halibut since 1964.

Approximately 250 additional copies of this post card have been received since the previous comment period. Individual post cards can be reviewed at the Secretary's desk in the Council meeting room.

Dear Mr. Lauber:

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

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

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

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

Respectfully,

Charles Edrickson

I SPORTFISH - I VOTE!



ALASKA VISITORS ASSOCIATION

2525 C Street, Suite 400 • Anchorage, Alaska 99503

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

E-mail: avanet.org • www.visitalaska.org

1999-2000

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Tina Lindgren

Executive Director

February 2, 2000

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

Dear Mr. Lauber and Council Members:

Thank you for the opportunity to comment on the Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis dated January 10, 2000. This report analyzes various alternatives and management measures under a halibut GHL (guideline harvest level) and/or moratorium in regions 2C and 3A (Southeast and Southcentral Alaska, respectively).

As indicated by data in the report, sportfishing opportunities are a key component of many visitor trips and are a staple summer activity for many Alaska residents. The North Pacific Fisheries Management Council (NPFMC) decisions will play a critical role in the future predictability and stability of the halibut sportfishery. In turn, the sportfishery plays an integral part of the Alaskan visitor experience and provides a significant local, regional and statewide economic and employment contribution.

As the major voice for the visitor industry, the Alaska Visitors Association (AVA) offers the following comments:

AVA supports Alternative 1, the status quo for a number of reasons:

1. **The report does not provide an adequate assessment of commercial vs. sport fishery net economic benefits.** While Council staff is to be commended for their efforts given the short time frames and lack of data in some cases, the data is insufficient to reach conclusions regarding GHL's. AVA questions some of the assumptions used to identify charter expenditures and believes the data under reports the sportfish economic impacts. Studies completed in other states comparing the economic value of a sportfish to a commercial fish show a significantly higher value for sportfish.
2. **The GHL's do not provide a fair and equitable allocation of the resource in light of the demand, the economics, and the Magnuson-Stevens Act.** The existing allocations and the halibut removals by category shown on page 94 of the report graphically depict that the total sportfish removal in thousands of pounds of halibut is only a small percentage of the total commercial catch. By another comparison, the total sportfish removal appears to be about equivalent to the commercial bycatch, which is in addition to the commercial catch. The current halibut division of about 91% commercial and 5% guided sport is not equitable.



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Chris von Imhof

Alaska Resort

Brad Walker

Alaska Airlines

Tina Lindgren

Executive Director

3. The two regions under consideration for GHL's encompass the two largest sport fisheries in Alaska with the greatest sportfish demand. If the State of Alaska wants to encourage tourism and broaden the economic and employment base, then halibut allocations between commercial and sportfish interests need to be more equitable to ensure adequate public access to this important fishery resource for resident and visitor anglers.
4. **The Magnuson-Stevens Act clearly defines a number of criteria regarding fishery allocations that do not appear to be met by the proposed GHL's including:**
 - Allocation decisions must consider impacts to recreational fisheries and not negatively impact them. Although the timeframe to enact management measures remains undefined, when the limit is reached, there will be a negative impact and public access to a public resource will be restricted.
 - No measure shall have economic allocation as its sole purpose. The decision to pursue charter boat limits transparently favors and protects commercial fisheries economic interests over sport fisheries, given the current and projected future allocations.
 - Conservation and management measures shall be based on the best scientific information available, and shall not discriminate between residents of different states.
 - Reduction of commercial bycatch and waste should occur before recreational fisheries are restricted. The poundage of the commercial bycatch is comparable to or more than the sport fish poundage.
 - Economic impacts to communities with healthy recreational fisheries need to be addressed. While the Council has noted the economic value of the commercial and sport fisheries on a broad regional scale, the jobs and community impacts (value to tourism) need further analysis. In addition, the contribution of sport fisheries to diversify the state's economy should be considered.
 - As discussed previously, allocation among fisherman be fair and equitable, and carried out in such a manner that no entity acquires an excessive share.
5. **The resulting disproportionate economic impact on the commercial and guided sport fisheries is not adequately quantified and addressed,** particularly for region 2C. (We agree with Council staff that the regional differences in the fisheries are different and the Kenai model is not applicable to this region.) A small increase in the charter boat allocation will have a large economic impact on the sport fishery and the businesses that support it; whereas, a small decrease in the commercial allocation will have a negligible, or very small impact.

Observation of the GHL process to date suggests the Council is poised to take action regardless of adequacies of the data to guide such decisions. If the Council proceeds to take action and institute GHL's in some form, AVA offers the following comments but does not waiver from our stated position in favor of the status quo.



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AVA Letter to NPFMC

Page 3

February 2, 2000

Any allocation supported by the North Pacific Fishery Management Council should provide for the following conditions.

- A. A sportfish allocation should be sufficient to:
 1. support the existing charter fleet,
 2. allow for future growth in the industry so that an allocation would not trigger management measures for a number of years,
 3. allow for future growth in undeveloped areas within the regions.
- B. The allocation needs to be market sensitive to:
 1. provide a stable and predictable halibut sportfishery,
 2. prevent a recurrence of events leading to the current GHL situation, when change is required.
- C. The allocation needs to be implementable at a reasonable agency cost recognizing the charter halibut catch is a relatively small amount compared to the total. Any measures to implement such a program need to be simple and straightforward.
- D. Any guided sportfish allocation should be applied to the CEY prior to deducting for commercial bycatch and wastage.

AVA has concerns about moratoriums on an area-wide and local basis which in essence create a limited entry fishery. Moratoriums, for species other than halibut, will require a state constitutional amendment and could have a number of unanticipated effects from increasing the cost of a halibut charter to reducing the fishing opportunity. AVA recommends the Council establish a committee to further investigate concepts such as a charter sportfish IFQ program before a decision is made. We respectfully request the committee include tourism industry representatives.

AVA supports conservation of the resource and supports development of local area management plans to address site specific issues. The GHL alternatives and management measures as proposed, however, simply preserves the disproportionate commercial allocation.

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

Sincerely,

Peggy McNeas
Tourism Planner

AVA Fisheries Committee Co-Chairs:

Ken Dole
Waterfall Resort

Robert Dindinger
Anglers Choice Lodge

Bob Sullivan

Presentation

The Plitt Company



— T H E —
PLITT
C O M P A N Y
— P R E M I U M S E A F O O D —

Objectives

- Provide a brief introduction of Plitt
- Explain my business, the role Alaskan Halibut has played and the investment we and our customers have made in promoting Alaskan Halibut
- Detail how our consumer's consumption has changed with the improvements IFQ's have afforded
- Establish with the council why what I have to say is important to the future of the Alaskan fishery, Plitt, my employees, my customers and consumers

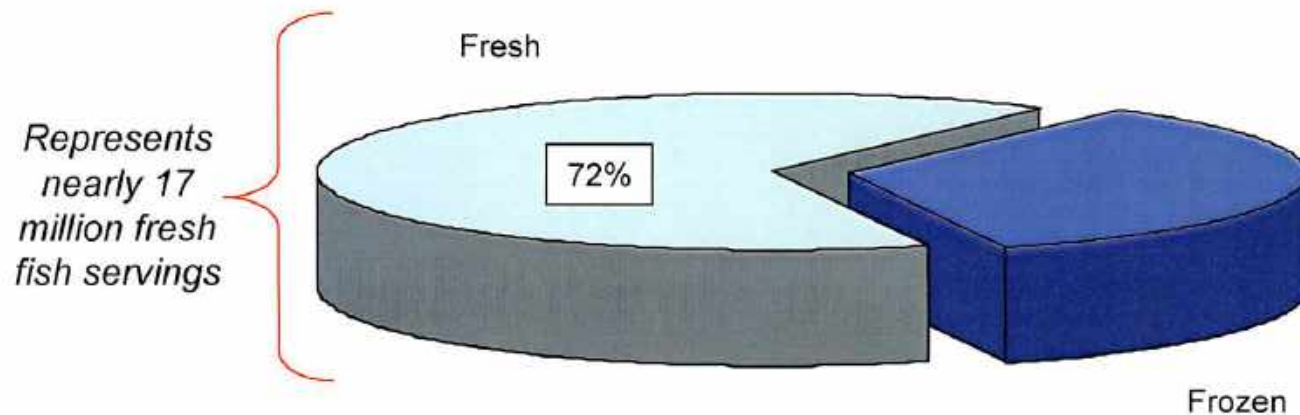
Objectives

Persuade the council to approve passage of an abundance-based percentage allocation for both the guided charter and commercial fleet



Who is Plitt?

- An 84 year old processor and purveyor of premium seafood based in Chicago



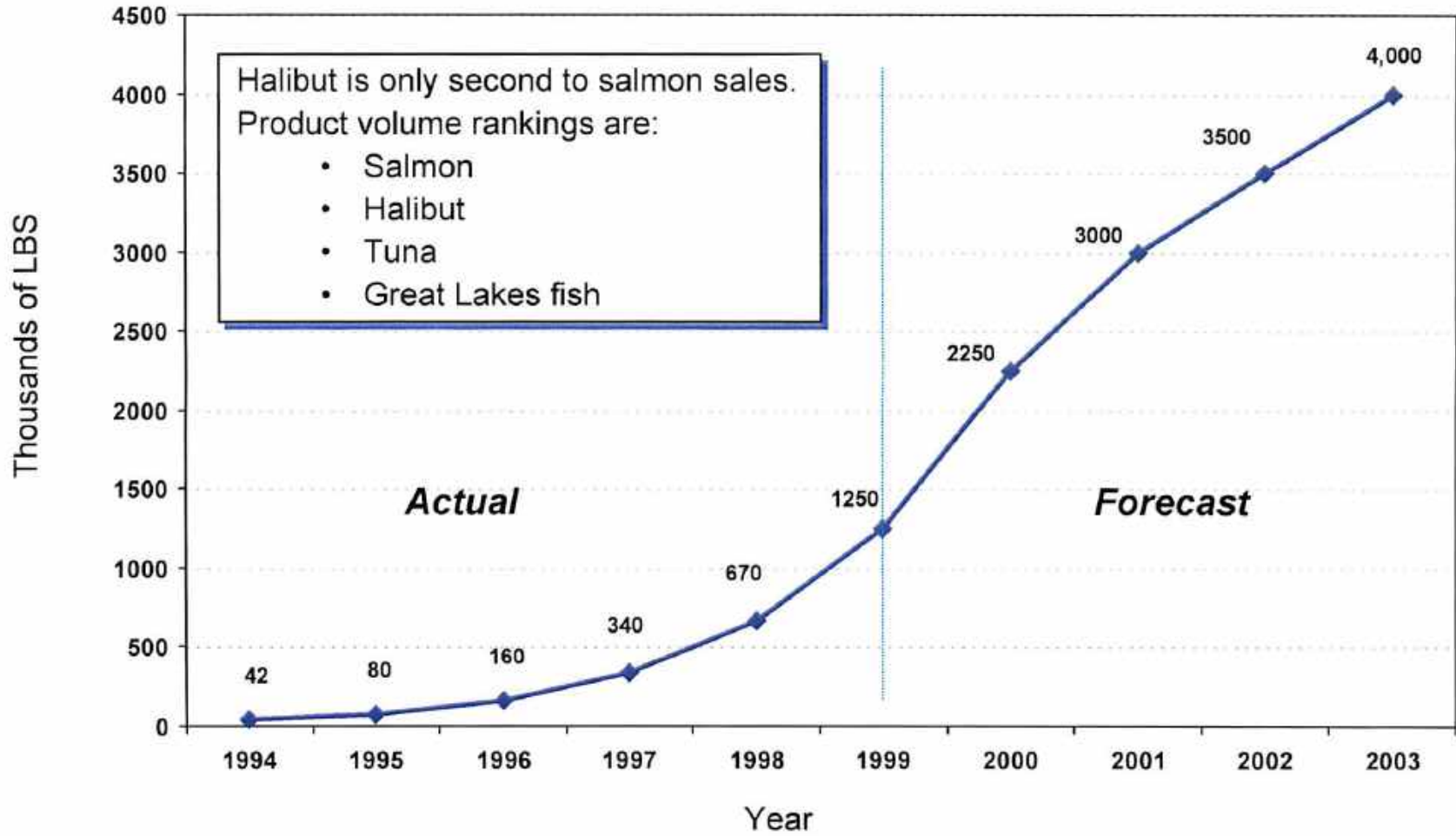
*\$35 mm sales
1800 customers*

- Our Chicago operation sells product throughout the Midwest, including Illinois, Missouri, Wisconsin, Indiana and Michigan
- Our Alaskan operation conducts buying throughout Alaska for sales to 18 states

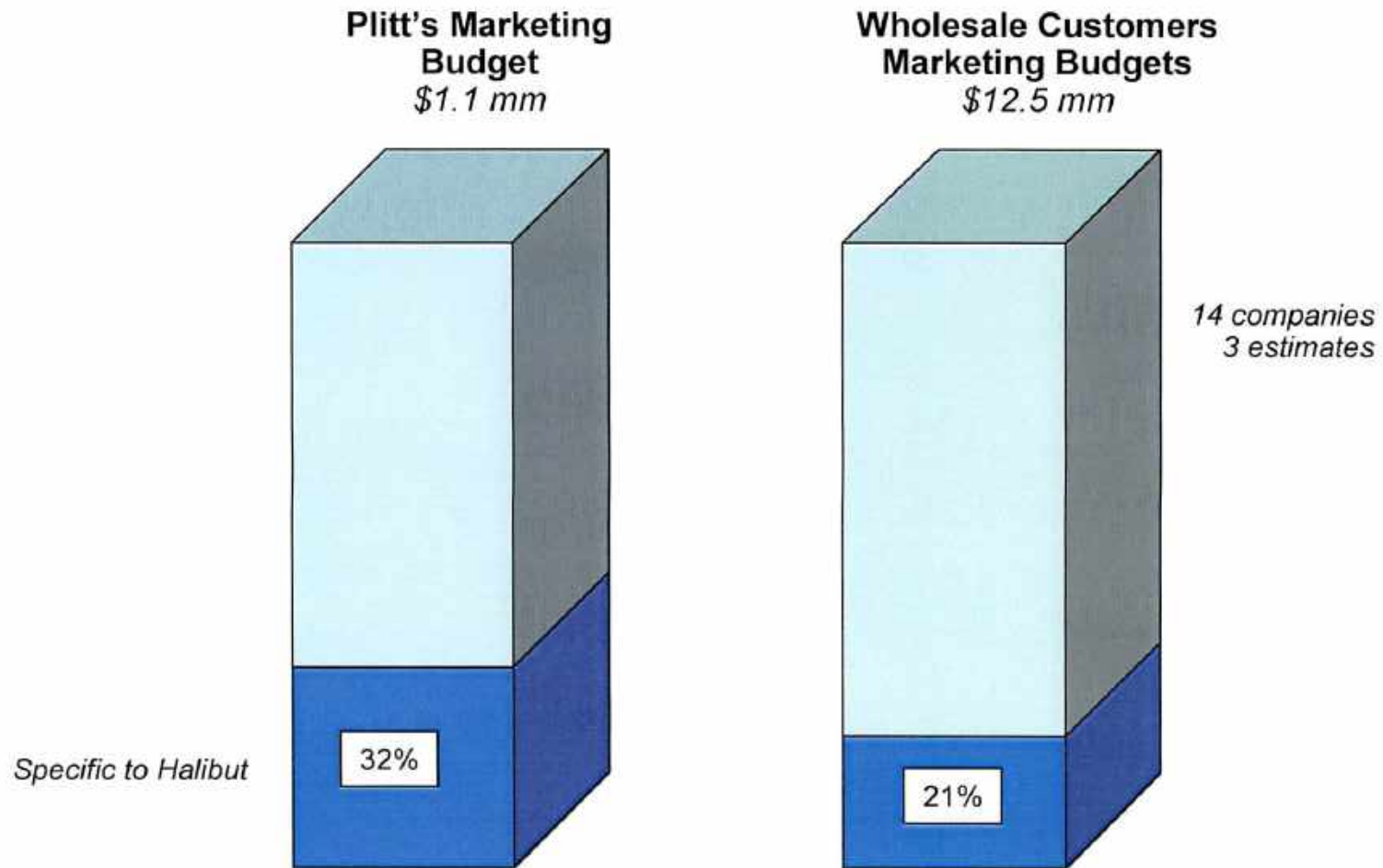


THE
PLITT
COMPANY
PREMIUM SEAFOOD

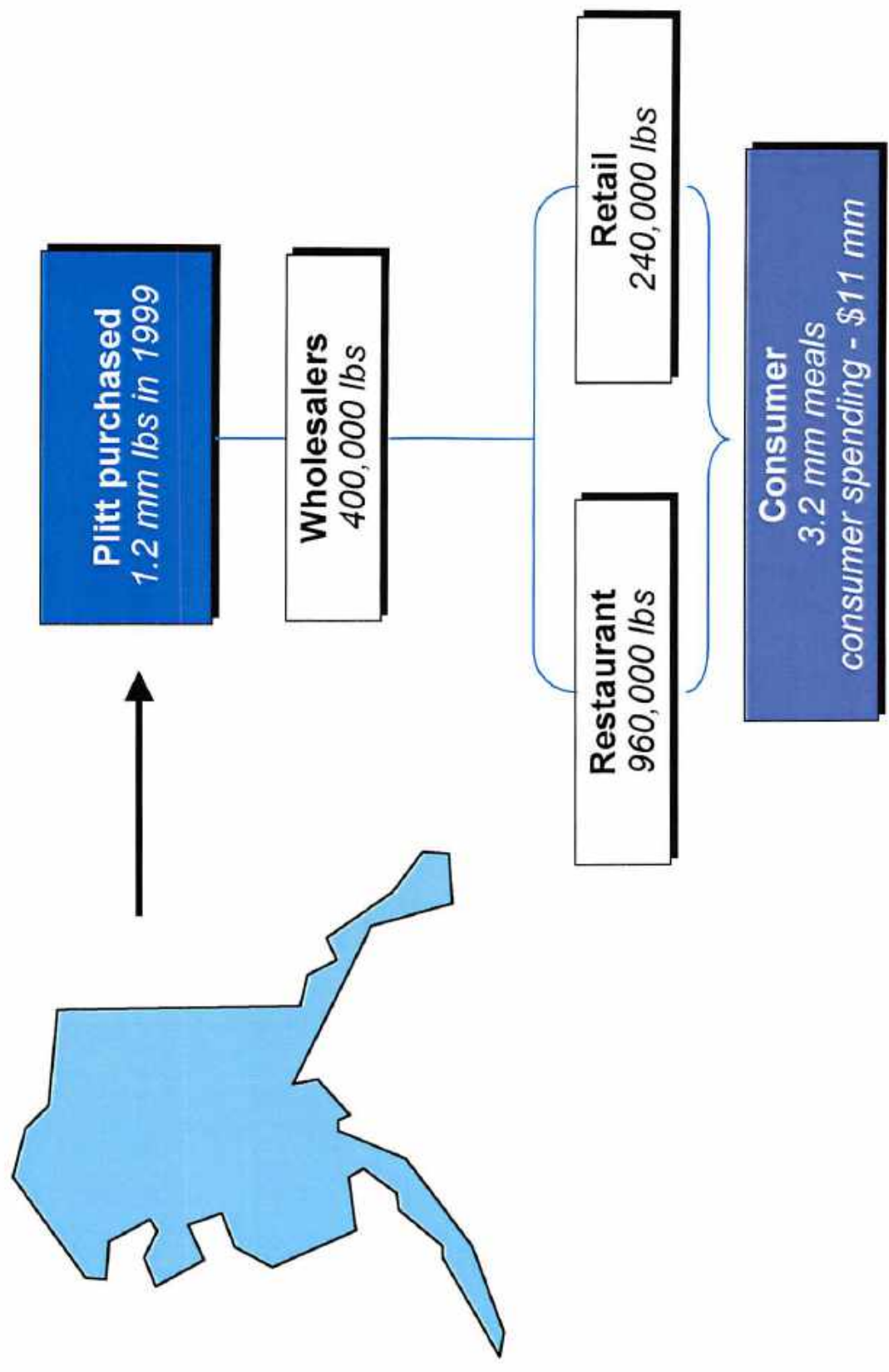
Fresh Halibut Sales



Plitt and its wholesale customers spend annually a considerable amount of money promoting Alaskan Halibut.



Nearly 20% of our fresh seafood offering is dependent on Alaskan Halibut.



I am here today representing 27 seafood wholesalers with a 1999 volume of 6.1 mm lbs. Together, our halibut purchases represents approximately 15 million consumer meals.

I want to address the importance of Alaskan Halibut through a series of questions our wholesaler group began addressing as this topic became public. My question will address volume, price, marketing investments, customer impact, impact on Alaskan fishery and impact on my employees.



Question #1:

Will a decline in Alaskan Halibut volume impact our sales?

(Will we sell something else if Alaskan Halibut is less available?)

Answer:

Yes - Our sales will be impacted by a decline in Alaskan Halibut availability. Our wholesale businesses have up to a 30% dependence on halibut. Many of us attribute our last five year growth to Alaskan Halibut. You can not just substitute one fish for the other as restaurants and consumers look for variety.

Threat:

Any policy or regulation that makes halibut less available hurts our sales.

Question #2:

Do changes in price impact our Alaskan Halibut volumes?

Answer:

Yes – Dover Sole has the highest consumer appeal in Chicago, but wholesale cost of \$8 - \$10 per lbs. make the product economically unavailable to most consumers.

Threat:

Policies or regulations that decrease supply will increase prices resulting in volume declines. High prices could make halibut economically unavailable to consumers.



Question #3:

How would our halibut marketing investments fair if product availability declined?

Answer:

We would lose our investments and any market momentum previously gained. A large enough decline in Alaskan Halibut would result in a complete suspension of marketing dollars.



Threat:

Any policy or regulation that appeared to threaten halibut volumes would impact our marketing spending.



Question #4:

Will a decline in halibut availability impact our food service customers?

Answer:

Yes – Removing variety from any menu threatens the ability of the restaurant owner to be competitive. Most damage would be done to seafood specialist and small restaurants.



Threat:

A policy or regulation that could result in a decline of halibut availability will hurt restaurants. These policies or regulations would leave consumers with a higher percentage of farmed fish choices; not the healthy choices consumers are seeking.



Question #5:

Will declines in halibut availability have an impact on the marketability of other Alaskan seafood products?

Answer:

Yes – Halibut has become the stepping stone of access to other Alaskan seafood products. We, (wholesalers) are now seeing Alaskan products like cod (bycatch), yellow eye, oysters and scallops. Even salmon is rebounding with some wholesalers.



Threat:

Lower volumes of halibut would threaten economical transportation of other Alaskan species.

Question #6:

How will a change in Alaskan Halibut volume impact our businesses?

Answer:

Unfortunately, our employees will take the biggest hit from a business perspective. A decline in business will result in layoffs. Filleters, warehouse and drivers will be the most affected groups.



Threat:

Policies or regulations that could result in a decline of halibut volumes will cost jobs at the wholesale level.

Conclusion

On behalf of my 27 wholesale customers, 108 employees, 1800 food service customers, millions of consumers, the Alaska fishery and my business please consider our interest when making recommendations. I have had to accept changes in product availability that have been sponsored by God. Please do not recommend or make regulations that will add another dimension to Alaskan Halibut availability.

Thank you!

