

M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
Executive Director



DATE: September 22, 1988

SUBJECT: Halibut Management

ACTION REQUIRED

- (a) Review halibut allocation proposals and recommendations from the Halibut Management Team and Halibut Regulatory Amendment Advisory Group.
- (b) Approve allocative proposals for analysis and public review.

BACKGROUND

Last year the Council initiated a process to consider proposals for the allocative management of halibut fisheries off Alaska, based upon authority of the North Pacific Halibut Act of 1982. After reviewing over 70 proposals the Council approved management measures for trip limits in IPHC Regulatory Areas 4C and 4E as well as an 80% allocation of the Area 4E catch to local fishermen. The Secretary of Commerce approved the trip limits for both areas but denied approval for the explicit allocation to local fishermen in Area 4E.

This year we received 15 proposals by the September 15 deadline; six additional late proposals have been received to date. The Halibut Management Team met by teleconference on September 21 and categorized the proposals into five main groups:

Limited access: Sixteen of the proposals advocated implementation of limited access in the halibut fishery; 12 of the proposals requested share quotas, four requested license limitation.

Gear limitation: Two proposals advocated limitations on the amount of gear (skate limits) that any vessel can fish.

Landing restrictions: One proposal advocated controls on the quality of fish that can be landed: all halibut should be dressed, bled, cleaned, and iced within 24 hours of being caught and all halibut must be dressed and chilled throughout prior to sale.

Area 4B: One proposal advocated that a series of short openings be allowed in Area 4B (Aleutian Islands) within a catch limit of 500,000 pounds, prior to a regularly scheduled opening of the area by the IPHC.

Area 4C: One proposal advocated that a trip limit of 10,000 pounds be enforced in Area 4C (Pribilof Islands) until 80% of the Area 4C catch limit is taken.

The Halibut Management Team will make its recommendations to the Halibut RAAG on September 26. Recommendations of the team and the RAAG, as well as copies of the proposals, will be distributed as a supplemental item during the Council meeting.

According to the schedule established under the halibut amendment cycle, proposals approved for analysis will be developed by the Halibut Management Team and a Notice of Availability for the preliminary analyses published in the Federal Register in October. At the December meeting the Council will review more complete analyses and public comment and recommend which proposals should be forwarded to the Secretary of Commerce for approval and implementation. This rapid schedule is required in order to coordinate with the IPHC, which conducts its annual meeting in January, and to assure implementation of rules in time for next year's halibut fishery.

**REPORT OF THE HALIBUT MANAGEMENT TEAM  
ON THE 1988 PROPOSALS FOR ALLOCATIVE MANAGEMENT  
OF HALIBUT FISHERIES OF ALASKA**

On September 21, 1988 the Halibut Management Team (MT) met by teleconference to review and categorize 15 regulatory proposals received from the public. Six additional proposals have been received by the Council since the September 15 deadline, however these proposals all fell within one of the categories previously outlined by the MT.

Following is the team's assessment of the proposals by category. The proposals themselves are attached for your review.

Limited access

Sixteen proposals advocated some form of limited access for the halibut fishery: four recommended license limitation, while twelve recommended individual or share quotas.

The MT recognized the importance of limited access as a management tool to address the intense "derby" nature of the halibut fishery. The team also recognized that such a sweeping management regime would require more extensive analysis than would be available under the annual halibut amendment cycle.

The team recommends, therefore, that halibut limited access be considered in association with current efforts on sablefish limited access, future FOG committee deliberations, or on its own extended cycle.

Gear limitation

Two proposals advocated limitations on the amount of gear (skate limits) that any vessel be allowed to fish.

Although such gear limitations can have allocative effects, the MT also recognized that such limits are an authorized management tool available to the IPHC and can be used for conservation-based management without undue allocative impacts if graduated by vessel size or other appropriate criteria. The team also recognized that enforcement of gear limitations may be very difficult, based upon past IPHC experience in the fishery, and that imposition of gear limitations could impact future qualification under possible limited access systems.

The team recommends, therefore, that requests for gear limitations be deferred to the IPHC, for their determination of whether such management controls are necessary for conservation reasons.

Landing restrictions

One proposal advocated that certain quality restrictions be enforced before halibut can be landed. Specifically, the proposal recommends that all halibut must be dressed, bled, cleaned, and iced within 24 hours of being caught and that all halibut must be dressed and chilled throughout prior to exvessel sale.

The team recognized that there may be quality problems because halibut is being landed during short openings, but that such landing restrictions are not conservation or allocative management measures. Although the Council may be interested in improving quality, in order to maximize the benefit to the Nation, the team noted that such regulations would be a departure from current management emphasis and would also be difficult to enforce.

The team recommends, therefore, that the Council refer this proposal to other agencies that may have direct authority over seafood quality, such as perhaps the Alaska Department of Environmental Conservation.

Short openings in Area 4B

One proposal requested that a series of short openings be allowed in Area 4B (Aleutian Islands), within a catch limit of 500,000 pounds, prior to the regularly scheduled and longer opening in the area set by the IPHC.

The team recognized that this proposal is an allocative issue of importance to local fishermen in the Atka area. Short openings in the beginning of the fishing year would not attract the non-local large boat fleet, thereby providing an opportunity for local fishermen to capture some part of the area catch limit without intense competition. Similar allocative proposals for Area 4B (smaller regulatory area, short seasons, etc.) were presented to the Council last year but were not acted upon. The Atka fishermen subsequently made similar proposals to the IPHC, who also did not act upon the requests because of their predominately allocative rationale. Although the setting of seasons is a management tool under the authority of the IPHC, its use for primarily allocative purposes would likely require Council concurrence.

The team recommends, therefore, that the Council consider this allocative proposal. If the Council chooses to make an allocative decision to enhance the opportunities of fishermen in Atka, then it could provide guidance to the IPHC to that effect while leaving the actual setting of season dates to the Commission. The team believes that sufficient analysis of the proposal could be accomplished within the current halibut amendment cycle.

#### Trip limits in Area 4C

One proposal requested that a 10,000 pound trip limit be established in Area 4C (Pribilof Islands) until 80% of the area catch limit is taken.

The team recognized that trip limits were established for this area by the Council last year (10,000 pounds until 50% of the catch limit was taken and 20,000 pounds thereafter). Under this regime, local vessels in 1988 captured approximately 80% of the Area 4C catch limit of 700,000 pounds. The current proposal requests additional allocative preference to local vessels by extending the 10,000 pound trip limit, which would discourage the non-local large vessel fleet, until 80% of the area catch limit is captured. The team believes that local vessels have secured an ample portion of the area catch limit and that further disincentives to non-local vessels may be unjustified.

The team recommends, however, that the Council consider this allocative proposal. If the Council chooses to make an allocative decision to further enhance the opportunity of local vessels to harvest the catch limit in Area 4C, then the team would be able to produce sufficient analysis of the proposal within the current halibut amendment cycle.

#### Summary

The MT has categorized the proposals into five groups. Considering the nature of each category, the team believes that only the proposals for short early openings in Area 4B and trip limits in Area 4C are amenable to analysis during the current amendment cycle. Proposals for limited access are recognized as important, but should be analyzed and reviewed over a longer term. Proposals for gear limitation should be deferred to the IPHC and the proposal on halibut quality (landing restrictions) should be deferred to another agency with authority over seafood quality.

REPORT OF THE HALIBUT REGULATORY AMENDMENT ADVISORY GROUP (RAAG)  
ON THE 1988 PROPOSALS FOR ALLOCATIVE MANAGEMENT  
OF HALIBUT FISHERIES OFF ALASKA

On September 21, 1988 the Halibut Management Team (MT) met by teleconference to review and categorize 15 regulatory proposals received from the public. Six additional proposals were received by the Council after the September 15 deadline, however these proposals all fell within one of the categories previously outlined by the MT.

On September 26, 1988 the Halibut Regulatory Amendment Advisory Group (RAAG) met to review the MT recommendations and to forward specific recommendations to the Council.

Following is the Halibut RAAG's assessment of all 21 proposals by category. The proposals themselves are attached for your review.

1. Limited access

Sixteen proposals advocated some form of limited access for the halibut fishery: four recommended license limitation, while twelve recommended individual or share quotas.

The MT recognized the importance of limited access as a management tool to address the intense "derby" nature of the halibut fishery. The team also recognized that such a management regime would require more extensive analysis than would be available under the annual halibut amendment cycle.

The team recommended, therefore, that halibut limited access be considered in association with current efforts on sablefish limited access, future FOG committee deliberations, or on its own extended cycle.

The Halibut RAAG also acknowledged the potential importance of the limited access issue, but recommends that the issue not be combined with ongoing consideration of sablefish limited access nor necessarily await deliberations of the FOG committee.

The Halibut RAAG recommends that preliminary, or exploratory, consideration be given to limited access in the halibut fishery, similar to exercises that the Council and other interest groups performed for sablefish. These would include questionnaires to fishermen and processors on appropriate limited access systems and potential workshops to assess industry interest. If sufficient interest is expressed, then halibut limited access could be put on an extended amendment cycle. *+ whether or not they want limited access*

2. Gear limitation

Two proposals advocated limitations on the amount of gear (skate limits) that any vessel be allowed to fish.

Although such gear limitations can have allocative effects, the MT also recognized that such limits are an authorized management tool available to the International Pacific Halibut Commission (IPHC) and can be used for conservation-based management without undue allocative impacts if graduated by vessel size or other appropriate criteria. The team also recognized that enforcement of gear limitations may be very difficult, based upon past IPHC experience in the fishery, and that imposition of gear limitations could impact future qualification under possible limited access systems.

The team recommended, therefore, that requests for gear limitations be referred to the IPHC, for their determination of whether such management controls are necessary for conservation reasons.

The Halibut RAAG recommends, similarly to the MT, the requests for gear limitation be referred to the IPHC.

3. Landing restrictions

One proposal advocated that certain quality restrictions be enforced before halibut can be landed. Specifically, the proposal recommends that all halibut must be dressed, bled, cleaned, and iced within 24 hours of being caught and that all halibut must be dressed and chilled throughout prior to exvessel sale.

The team recognized that there may be quality problems because halibut is being landed during short openings, but that such landing restrictions are not typical conservation or allocative management measures. Although the Council may be interested in improving quality, in order to maximize the benefit to the Nation, the team noted that such regulations would be a departure from current management emphasis and would also be difficult to enforce.

The team recommended, therefore, that the Council refer this proposal to other agencies that may have direct authority over seafood quality, such as perhaps the Alaska Department of Environmental Conservation.

The Halibut RAAG recommends that the Council endorse concern for halibut quality and direct Council staff to make appropriate inquiries to agencies of the State of Alaska on how such landing laws or regulations could be enacted. Below is a draft motion for Council consideration:

Move that the Council express concern for the quality of halibut landed and direct staff to correspond with appropriate agencies of the State of Alaska to encourage their pursuit of landing laws or regulations, similar to the HANA proposal, to require that fishermen take appropriate care (i.e., dress and ice) of halibut prior to delivery to processors.

4. Short openings in Area 4B

One proposal requested that a series of short openings be allowed in Area 4B (Aleutian Islands), within a catch limit of 500,000 pounds, prior to the regularly scheduled and longer opening in the area set by the IPHC.

The team characterized this proposal as an allocative issue of importance to local fishermen in the Atka area. Short openings in the beginning of the fishing year would not normally attract the non-local large boat fleet, thereby providing an opportunity for local fishermen to capture some part of the area catch limit without intense competition. Similar allocative proposals for Area 4B (smaller regulatory area, short seasons, etc.) were presented to the Council last year but were not acted upon. The Atka fishermen subsequently made similar proposals to the IPHC, who also did not act upon the requests because of their predominately allocative rationale. Although the setting of seasons is a management tool under the authority of the IPHC, its use for primarily allocative purposes would likely require Council concurrence.

The team recommended, therefore, that the Council consider, although not necessarily approve, this proposal. If the Council chose to make an allocative decision to enhance the opportunities of fishermen in Atka, then it could provide guidance to the IPHC to that effect while leaving the actual setting of season dates to the Commission. The team believed that sufficient analysis of the proposal could be accomplished within the current halibut amendment cycle.

The Halibut RAAG did not believe that the proposal constituted an overt allocative request, because no explicit allocative regime (e.g., trip limits, local preference) was included in the proposal. Therefore the Halibut RAAG recommends that the proposal, without any allocative emphasis, be referred to the IPHC for their consideration and action.

5. Trip limits in Area 4C

One proposal requested that a 10,000 pound trip limit be established in Area 4C (Pribilof Islands) until 80% of the area catch limit is taken.

The team noted that trip limits were established for this area by the Council last year (10,000 pounds until 50% of the catch limit was taken and 20,000 pounds thereafter). Under this regime, local vessels in 1988 captured approximately 70% of the Area 4C catch limit of 700,000 pounds. The EA/RIR for last year's proposal predicted that local fishermen would capture only between 28.6 and 31.3 % of the Area 4C catch limit under the enacted regulations.

These regulations will remain in force if no action is taken to repeal them. The current proposal, however, requests additional allocative preference to local vessels by extending the 10,000 pound trip limit, which would discourage the non-local large vessel fleet, until 80% of the area catch limit is captured. The team believed that local vessels have secured an ample portion of the area catch limit and that further disincentives to non-local vessels may be unjustified.

The team recommended, however, that the Council consider, although not necessarily approve, this allocative proposal. If the Council chose to make an allocative decision to further enhance the opportunity of local vessels to harvest the catch limit in Area 4C, then the team would be able to perform sufficient analysis of the proposal within the current halibut amendment cycle.

The Halibut RAAG recommends that the Council consider this proposal but makes no recommendation on whether or not the Council should approve the action.

SUMMARY

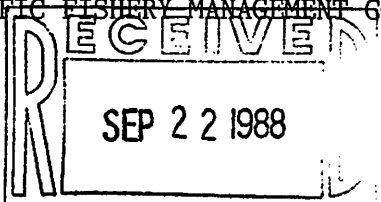
The MT and RAAG have categorized the proposals into five groups. Considering the nature of each category, the Halibut RAAG believes that only the proposal for trip limits in Area 4C is amenable to Council analysis and action during the current amendment cycle. Proposals for limited access are recognized as important but should be analyzed and reviewed over a longer term, beginning with a canvas of industry opinion. Proposals for gear limitation should be referred to the IPHC and the proposal on halibut quality (landing restrictions) should be referred to another agency with authority over seafood quality, along with a Council endorsement for action to improve the quality of halibut landings. The proposal for short season openings in Area 4B should be referred to the IPHC without connotation of allocative intent or effect.



HALIBUT PROPOSAL

09-15-88

~~NORTH PACIFIC FISHERY MANAGEMENT COUNCIL~~



**ROBERT E. PRIES**  
13805 209th Ave. N.E.  
Woodinville, WA 98072

I WOULD LIKE TO SUPPORT A MOVE TO THE INDIVIDUAL SHARE QUOTA SYSTEM WHICH I BELIEVE IS SOMETIMES REFERRED TO AS THE I. Q. SYSTEM. AS I UNDERSTAND THIS SYSTEM PAST PARTICIPANTS IN THE HALIBUT FISHERY WOULD RECEIVE ONE OR MORE SHARES DEPENDING ON THEIR QUALIFICATIONS TO MEET A SET OF CRITERIA DESIGNED TO MEASURE A FISHERMAN'S RIGHT TO RECEIVE AN INTEREST IN THE FISHERY. THIS CRITERIA WOULD FOLLOW THAT WHICH WAS USED IN ESTABLISHING OTHER LIMITED ENTRY FISHERIES OR THEY WOULD BE MODIFIED AS NECESSARY. THESE SHARES COULD THEN BE BOUGHT AND SOLD AT WILL WITH PERHAPS SOME CAP ON THE MAXIMUM NUMBER OF SHARES THAT ANY ONE FISHERMAN COULD OWN. THE IPHC THEN WOULD MERELY ESTABLISH THE QUOTA FOR EACH AREA AS THEY DO NOW, DIVIDE THE NUMBER OF SHARES IN EACH MANAGEMENT AREA INTO THE QUOTA FOR THAT AREA AND EACH FISHERMAN WOULD BE ABLE TO CATCH ONLY THE AMOUNT OF HALIBUT TO WHICH HE WAS ENTITLED BY THE NUMBER OF SHARES WHICH HE OWNED OR LEASED. FISHING WOULD BE OPEN CONTINUOUSLY WITH CLOSURES ONLY AS BIOLOGICALLY NECESSARY.

THE OBJECTIVE OF THIS PROPOSAL IS TO ENHANCE THE PROFIT POTENTIAL FOR A REASONABLE NUMBER OF FISHERMEN WHILE ENHANCING SAFETY, REDUCING LOSS OF RESOURCE, AND REDUCING THE ENFORCEMENT BURDEN.

UNDER THE PRESENT SYSTEM THE FLEET HARVESTING CAPACITY FAR AND AWAY EXCEEDS THE HALIBUT RESOURCE AND RESULTS IN CHAOS NOT ONLY ON THE FISHING GROUNDS BUT MANY TIMES AT THE PROCESSOR PLANTS AS WELL. THE PRESENT SYSTEM PROMOTES:

OVER CAPITALIZATION

UNECONOMICAL FISHING METHODS WHICH ARE BROUGHT ABOUT BY PULSE FISHING PERIODS.

DEAD LOSS DUE TO PROSPECTING

DEAD LOSS DUE TO EXCESSIVE GEAR LEFT IN THE WATER DUE TO STORMS, ENCOUNTERING A HIGHER CATCH RATE THAN EXPECTED AND EXCEEDING VESSEL CAPACITY, OR SIMPLY NOT BEING ABLE TO RETRIEVE FISHING GEAR BECAUSE OF THE FISHING PERIOD TIME CONSTRAINT IN CONJUNCTION WITH ANY OF MANY OTHER REASONS.

PULSE AVAILABILITY OF FRESH HALIBUT RESULTING IN LOWER PRICES AND REDUCING PRODUCT POTENTIAL.

POORER HANDLING TECHNIQUES DUE TO DERBY FISHING RESULTING IN LOWER QUALITY.

PRESSURE ON BOAT OWNERS AND CREWS TO FISH IN DANGEROUS STORMS AFTER THE TIME AND EXPENSE TO GEAR UP FOR A FISHING PERIOD WITH NO WAY TO RECOVER THEIR LOSSES.

IT APPEARS TO ME THAT IT WOULD BE MUCH EASIER FOR ENFORCEMENT TO WATCH THE LIMITED NUMBER OF DELIVERY POINTS AS OPPOSED TO KEEPING WATCH ON THE ENTIRE FISHING GROUNDS. I BELIEVE THAT A SYSTEM OF RECORDS AND REPORTING COULD BE DEvised THAT WOULD BE BOTH MORE EFFECTIVE AND LESS EXPENSIVE THAN THE PRESENT SYSTEM.



THE PRESENT PRICE PAID TO THE FISHERMEN FOR HALIBUT IS DIFFICULT TO UNDERSTAND. WHEN ONE FACTORS IN THE FISHERMANS LABOR IN GUTTING THE FISH ALONG WITH THE PRICE BEING BASED ON HEAD OFF AND GUTTED WITH ICE AND SLIME DEDUCTIONS THE FISHERMAN GETS MORE FOR HUMPYS AND DOGS. YET THAT IS NOT THE CASE AT THE RETAIL MARKET LEVEL. I BELIEVE THAT SOME SORT OF LIMITED ENTRY SYSTEM RESULTS IN THE FISHERMAN GETTING A FAIR PRICE.

CONGRESS IS FINALLY STEPPING IN WITH SOME SAFETY LEGISTRATION AFTER THE INDUSTRY FAILED TO TAKE POSITIVE ACTION TO PROMOTE SAFETY. WE ARE ALL AT FAULT FOR ALLOWING THIS THIS SITUATION WHICH PRESSURES PEOPLE TO TAKE GREAT PHYSICAL RISK IN ORDER TO SURVIVE FINANCIALLY, ESPECIALLY WHEN SUCH A GOOD ALTERNATIVE EXISTS.

I BELIEVE THAT A SHARE QUOTA SYSTEM ADDRESS, AND VERY EFFECTIVELY SO, ALL OF THE MAJOR REGLATORY PROBLEMS IN THIS AREA. "THERE ARE TOO MANY PEOPLE IN THE FISHERY NOW" IS THE REASON OFTEN CITED AGAINST LIMITED ENTRY. THE SHARE QUOTA SYSTEM IS THE MOST EFFECTIVE SOLUTION TO THIS PROBLEM. NOBODY HAS TO BE LEFT OUT ENTIRELY AND FISHERMEN CAN BE AWARDED FISHING RIGHTS IN PROPORTION TO WHAT THEY DESERVE. SOME FISHERMEN WILL RECEIVE VERY FEW SHARES AND MAY FEEL PRESSURED TO EITHER SELL THEIR SHARES OR PURCHASE OTHER SHARES BUT IN THE END OUR FREE MARKET SYSTEM WILL DO ITS THING AND THE PRICE OF A SHARE WILL SEEK ITS REAL VALUE. EVERYONE WILL HAVE A MUCH BETTER BETTER CHANCE OF GETTING THEIR FAIR SHARE AS OPPOSED TO THE WINNER TAKE ALL SYSTEM OF LIMITED ENTRY WHERE ALL PERMITS ARE EQUAL.

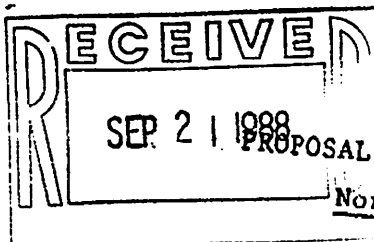
IT IS DIFFICULT TO UNDERSTAND WHY ANY FISHERMAN LOOKING BEYOND HIS OWN WALLET AND CONCERNED ABOUT THE HEALTH AND QUALITY OF THIS FISHERY COULD OPPOSE A SHARE QUOTA SYSTEM. THIS DOES PREVENT A FISHERMAN FROM GOING OUT FOR THE BIGGEST SHARE OF THE CATCH UNLESS OF COURSE HE OR SHE OWNS MORE SHARES. I THINK THAT PERSON WILL FIND THAT EVEN THOUGH HE MIGHT NOT GET AS BIG A PIECE OF THE PIE AS HE WOULD LIKE HE WILL BE GETTING A SHARE OF A BIGGER AND MUCH MORE VALUABLE PIE.

ANY FORM OF LIMITED ENTRY IS A FAR CRY FROM THE DAYS PAST WHEN THERE WERE A QUARTER OF THE FISHERMEN WITH ONE TENTH OF THE HARVESTING CAPACITY. TO GO WITH A HALF LIMITED ENTRY SYSTEM IS TO SOLVE HALF OF THE PROBLEM. THE SAME PROBLEMS STILL EXIST BUT ON ALITTLE SMALLER SCALE. WHY FIX HALF OF THE FISHERY WHEN YOU CAN FIX IT ALL?

WITH ALL THE CURVE BALLS THAT MOTHER NATURE, THE MARKET PLACE, THE EXCHANGE RATE, THE POLITIANS, THE INSURANCE COMPANYS AND MY BOAT CAN THROW AT ME I WELCOME THE STABLEIZING INFLUENCE THAT LIMITED ENTRY BRINGS.

SINCERELY,

  
ROBERT E. PRIES



SEP 21 1988

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: BOB ENGLISH

Address: LARRY'S MARKETS  
14900 INTERURBAN, AVE  
Telephone: SEATTLE, WA 98168  
206-243-2451

Date: 9/21/88

Brief Statement of Proposal: I SUPPORT THE I.T.Q. CONCEPT

Objectives of Proposal: (What is the problem?)

1. more consistent quality & availability
2. control the timing & flow of product to suit market conditions
3. HAVE FRESH AVAILABLE MOST OF THE YEAR.

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

I HAVE NOT SEEN ANY IMPROVEMENT IN QUALITY TO DATE UNDER PRESENT SYSTEM

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

THE END USER, (CONSUMER) IN QUALITY IMPROVEMENT & THE FISHERMAN THRU INCREASED CONSUMPTION DUE TO BETTER CONSISTENT QUALITY IN THE MARKET PLACE

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

Prohibit the purchase of BAC Fish by processors but I understand this cannot be done according to the processors themselves!

Supportive Data & Other Information: What data is available and where can it be found?

I HAVE participated in the twenty four hour Curbys in 85-87-88 & have witnessed the poor handling on board, the unretrieved gear, destroying of juvenile fish, notes of fish cannery docks for long periods of time waiting for processing, fishermen dressing fish 3 days after closure etc etc.

Signature: [Signature]

AS A RETAILER I HAVE SEEN THE INCONSISTENT QUALITY  
OR JUST PLAIN BAD FISH IN THE DISTRIBUTION SYSTEM.

AS A RETAILER I AM THE ONE THAT OWNS THE FISH  
WHEN IT GOES BAD DUE TO POOR HANDLING AS I AM  
THE CLOSEST TO THE CONSUMER IN THE DISTRIBUTION  
SYSTEM.

IT IS A RETAILER'S GOAL TO SELL BEFORE SPOilage  
IF THAT RETAILER HAS NO CONSCIENCE THAT CAN  
USUALLY BE LOW. SO WHO SUFFERS -- THE CONSUMER  
IS SHE OR HE GOING TO BUY THAT SPECIES OR EAT  
ANY KIND OF FISH AGAIN? THEN WHO SUFFERS, THE FISHERMAN!  
IF THAT RETAILER TAKES A LOSS, IS HE  
GOING TO GET EXCITED NEXT TIME AROUND? IF SO  
THE FISHERMAN LOSES.

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RECEIVED  
SEP 19 1988

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA

North Pacific Fishery Management Council

Name of Proposer: DAVID L. TWINING

Date: Sept. 8, 1988

Address: 1401 12th St  
Bellingham, WASH 98225

Telephone: 206 7333470

Brief Statement of Proposal:

Objectives of Proposal: (What is the problem?)

Gluts of Halibut (FRESH) on market at and for short periods of time. Inconsistent quality unless dealing with a boat direct.

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

The council sets the regulations for the fishery.

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

Everyone wins - Especially the end user, no long waits to unload boats on short 24hr fisheries. No extra incentive for fisher to take care of his fish - just get as much as possible in 24hr.

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

a solution which each boat would have a quota to fill. ~~San Francisco~~ also when long lining, you catch different species so individual quotas on these fish would also make for a more effective harvest of these

Supportive Data & Other Information: What data is available and where can it be found?

personal experience Also have seen San Francisco Rose herring managed in a way to produce best possible product by having an individual quota for purse seine: no large quota but once where you take 70% fish that what you

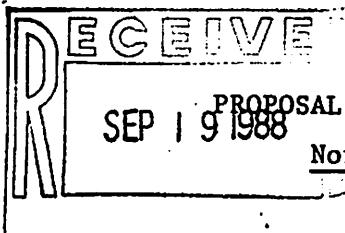
Signature:

David Twining 9/8/88

②

Which are usually wasted because no market or the  
skin weight will take up space a habitat could. on  
Short 24 hr. opening.

Get paid for but wait & take 10-13% fish more more  
Better product. Just an example of individual quotes.



SEP 19 1988

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA

North Pacific Fishery Management Council

Name of Proposer: Richard C. Rhodes  
Queen Anne Thriftway

Date: September 13, 1988

Address: 9 Crockett  
Seattle, WA 98109

Telephone: 206-284-2530

Brief Statement of Proposal: The short fishing season dates should be eliminated and replaced with a system of a 12 month or at least a 9 month season.

Objectives of Proposal: (What is the problem?) To eliminate the problem of too many fish coming to the market place at once, causing far too much waste of a valuable resource and an unnecessary deterioration of quality.

Need and Justification for Council Action: (Why can't the problem be resolved through other channels?) Under the present marketing method, the consumer is completely ignored. Unless the fishing industry considers the consumer, the demand for halibut will be relaced by other species, which are being delivered to the consumer in a high quality standard condition.

Foreseeable Impacts of Proposal: (Who wins, who loses?) In the short range there certainly will be adjustments, particularly within the fisherman ranks. Quite possibly marginal operators will be eliminated by those who are more efficient. The winners will be the consumer, the processors and the wholesalers.

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

Supportive Data & Other Information: What data is available and where can it be found? The overwhelming majority of retailers never know from one shipment to the next, what the condition of the product they have ordered will be like. The consumer is being disappointed too often. The industry itself must take the responsibility for getting this great fish to the marketplace in the kind

Signature: of condition that it deserves.

33A/AL

*Richard C. Rhodes, Pres.*

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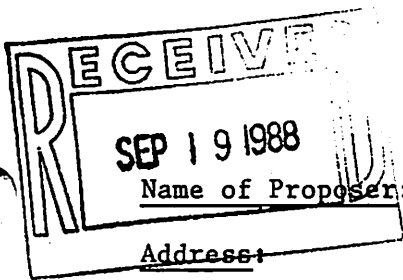
Proposal Details : To maintain the resource, naturally quotas must be set. I suggest that the number of vessels be controlled, and that each vessel be equipped with minimum standards for gear, refrigeration, holding capacity, etc., to reduce damage and deterioration to the product. Also that each licensed vessel be given a quota based on reasonable criteria, such as size of boat, etc. After the quota has been established, the vessel owners could select their own timetable of when to fish. The expectation would be that in time, the market for halbut would become more orderly, the quality standards would be raised and the consumer would be able to buy excellent quality halibut several months out of a year, and even the fisherman would be able to expect a price which would yield a satisfactory return on his investment.

RR:wg



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GROUND FISH PLAN AMENDMENT PROPOSAL  
North Pacific Fishery Management Council



Name of Proposer: Stephen Kurth  
Address: 11760 'A' Dix Court  
Anchorage, AK 99515  
Telephone: (907) 522-1673  
Fishery Management Plan: Halibut

Date: 9/15/88

Brief Statement of Proposal: Establish a triplimit or share system and allow the limit or share to be taken over an unspecified time frame.

Objectives of Proposal: (What is the problem?)

Twentyfour hour openings press skippers to fish when weather conditions are poor therefore pushing safety to the limit.

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

The council has the authority to take action

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

Who wins? Those who would otherwise lose (or gamble with) life, limb or property.

Who loses? Those who normally catch above average poundage.

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

- 1) No action
- 2) Limited entry in the traditional sense.
- 3) Make halibut fishing an incidental catch fishery bringing to an end a way of life for some longliners.

Supportive Data & Other Information: What data is available and where can it be found?

Examine the small boat catch and log gear data for the past few years; especially in area 3A where we have been plagued with bad weather.

Signature:

Stephen Kurth

RECEIVED

SEP 20 1988

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA

North Pacific Fishery Management Council

6

Name of Proposer: David Johnson

Date: 9/10/88

Address: Restaurants Unlimited  
1918 N Northlake Way  
Seattle WA 98103

Telephone: (206) 634-0550

Brief Statement of Proposal:

Devise a resource Allocation System to reduce size of catch/trip & or # of trips

Objectives of Proposal: (What is the problem?)

Halibut is being harvested in short periods & in large quantities causing significant amounts to be distressed product.

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

Too many cooks are spoiling the broth over halibut. Someone (you) must take charge & manage resource & harvest effectively.

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

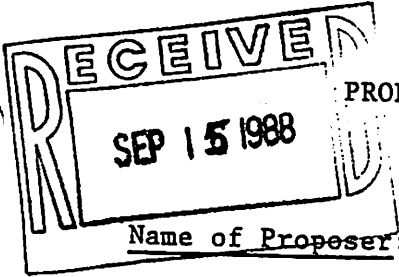
Everyone wins. No one loses.

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

Supportive Data & Other Information: What data is available and where can it be found?

Signature:

David Johnson



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: BRUCE J. GABRYS

Date: 15 Sept 1988

Address: P.O. Box 773435  
Eagle River, Alaska  
99577

Telephone: (907) 243-7017

Brief Statement of Proposal:

HALIBUT FISHERY

Initiate a moratorium which ceases the issuance of any IHPC license to vessels not currently engaged in the fishery. Additionally, cease the issuance of ADF&G Commercial Fisheries Entry Commission Permits to applicants not currently holding a valid permit card.

Objectives of Proposal: (What is the problem?)

To limit additional entrants into an overcrowded fishery and to limit increased capitalization of vessels and equipment in the fishery until an equitable solution can be established for the allocation of the resource.

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

It is difficult to believe that the fishery can be shortened beyond the current limitations. Continued increase in fishing effort by new entrants will only complicate the current attempts to devise a method of regulating the fishery.

Foreseeable Impacts of Proposal: (Who wins; who loses?)

New entrants would have to participate in other fisheries until a system of new entrants or transfer of existing permits can be established.

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

This is an interim measure to be used as a start point.

There is no simple solution to limiting effort in a fishery. As a result, many years have passed without anything being agreed upon and approved. A simple moratorium may be a feasible and achievable first step to an overall management plan.

Supportive Data & Other Information: What data is available and where can it be found?

Various reports from IHPC, Market data, Safety data, Food quality data

Signature:



**HALIBUT ASSOCIATION**

**OF NORTH AMERICA**

2208 N.W. MARKET STREET, #311  
SEATTLE, WASHINGTON 98107  
PHONE 206-784-8317

OFFICERS FAX (907) 271-2817

**PRESIDENT**  
RALPH G. HOARD  
Icicle Seafoods, Inc. **ATTN: CLARENCE PAUTZKE**  
EXECUTIVE DIRECTOR

September 14, 1988

**VICE PRESIDENT**  
BARRY J. McMILLAN  
J.S. McMillan Fisheries Limited

**TREASURER**  
RICHARD G. KELLY  
Mr. Clarence Pautzke  
**SECRETARY**  
CLYDE F. STERLING  
Executive Director

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

**TRUSTEES**

**ALASKA**

JAY G. CHERRIER  
Dagnet Fisheries Co.  
MARK S. SANDVIK  
Icicle Seafoods, Inc.  
THOMAS E. THOMPSON  
Sika Sound Seafoods, Inc.

Dear Clarence:

The Halibut Association of North America ("HANA") is submitting the attached proposal for your consideration. Please don't hesitate to call if you need clarification or questions arise.

**BRITISH COLUMBIA**

GEORGE A. DODMAN  
British Columbia Packers Ltd.  
JIM KLOSCHINSKY  
Lions Gate Fisheries Limited

For the record, our Association represents 00% plus of all Halibut buyers in Alaska, Canada, Washington State and Oregon.

**CANADA**

RONALD MULLOCK  
The Canadian Fishing Company Ltd.

**WASHINGTON**

MARK BRASHEM  
Booth Fisheries Corporation  
WILLIAM J. KELLIHER  
Kullher Fish Company

Thanks for your consideration.

**JOHN LECTURE**

Seafood Producers Cooperative

**MEMBERS**

**ALASKA**

Dagnet Fisheries Co., Inc.  
Icicle Seafoods, Inc.  
Polar Seafoods  
Petersburg Fisheries  
L.C. Phillips & Son  
Seward Fisheries  
Sika Sound Seafoods, Inc.  
Western Alaska Fisheries, Inc.  
Yukon Fisheries, Inc.

**BRITISH COLUMBIA**

Bilauquale Fish Limited  
British Columbia Packers Limited  
The Canadian Fishing Company Limited  
Fishermen's Federation, Inc.  
Lions Gate Fisheries Limited  
J.S. McMillan Fisheries Limited  
Ocean Fisheries Limited  
Seaford Products Company  
Seaport Crown Fish Co. Ltd.  
Vancouver Shell Fish and Fish Co. Ltd.

**OREGON**

Astoria Seafood Company

**WASHINGTON**

Alaska Pacific Seafoods  
Booth Fisheries Corporation  
Borntun Seafoods, Inc.  
Dory Seafoods, Inc.  
Kullher Fish Company  
Northern Products Corporation  
Pacific Alaska Seafoods, Inc.  
Seafood Producers Cooperative  
Seattle Seafoods, Inc.  
Tongue Seafoods Corporation  
Washington Fish and Oyster Company  
Windjammer Seafoods, Inc.

Attachments: (3)

Sincerely

Ralph G. Hoard  
President

Halibut Association of North America

RGH/jw

PROPOSAL FOR REGULATION OF THE HALIBUT FISHERY IN ALASKA

BRIEF STATEMENT OF PROPOSAL

Enact a landing law that requires three things:

1. All halibut must be dressed, bled, cleaned, and iced within 24 hours of catching.

Coast Guard fly overs to make sure boats quit fishing when the season closes could be extended to this cutoff looking for boats still dressing fish. 100% surveillance isn't necessary. By making an example of a few violators, the threat of being caught should solve the problem. Visual observations outside boat harbor entrances would also be useful. (Our Association would like to see a shorter period than 24 hours, but this is a reasonable place to start.)

2. All halibut must be dressed prior to being sold, and recorded on a fish ticket by a licensed buyer. No buyer may purchase fish in the round at his dock, buying station, or tender.

This is easily enforceable by fining any buyers violating this law. If the fine is substantial enough only one example will be needed. It is either dressed or illegal.

3. All halibut must be chilled throughout to less than 40°F prior to being sold to a licensed buyer.

As in 2. above, only one example will be needed to be made and buyers will follow the law. A thermometer poked into the flesh will easily determine whether it is a legal fish or not.

OBJECTIVE OF PROPOSAL

Under the current "Olympic System" with 24-hour or less fishing periods, fishermen are under intense pressure to maximize catching time at the expense of properly handling the fish after they are caught. As a result, fish quality to the end user is being lowered, and value perceived by the marketplace lessened. Under any circumstances this is not good, but especially not during times of increasing halibut quotas, weak demand in the Japanese market for the small fish, and an abundance of other white fishes. This negative market image comes back ultimately to be reflected in fish price.

HALIBUT ASSN. OF NORTH AMERICA  
Proposal for Regulation of the  
Halibut Fishery in Alaska  
13-Sep-88  
Page 2

Currently, fishermen are not all playing under the same rules which put some at a competitive disadvantage. Those that do not properly chill their fish can avoid the expense of ice or installing chilling equipment. Those who deliver their fish in the round can get by with considerably less crew and thus increase their earnings.

If a fisherman knew up front that he had to dress and chill his fish properly or buyers might be forced legally to refuse his catch, he would take the necessary crew, and have proper chilling means to handle his fish.

NEED AND JUSTIFICATION FOR COUNCIL ACTION

This is certainly outside the scope of the International Pacific Halibut Commission. The State of Alaska can help enforce possibly with their Department of Environmental Conservation inspectors, but this issue ends up with the Council as being socio-economic.

Many feel that industry (buyers) should take care of this problem themselves by either refusing to purchase poor quality fish or by paying a premium to fishermen who do properly handle their halibut. As buyers, we can get together to promote sales, work on quality problems, watch the political issues, etc., but when it comes to plugging it out on the docks, all bets are off. If one buyer in a port where there is lots of competition accepts poor quality fish or pays a premium for good quality fish, this puts pressure on all buyers to follow suit with their fishermen. If not "competitive" on all issues, a buyer will lose his fishermen slowly at first and more quickly as his non-competitive practice persists. The premium mentioned above quickly becomes "the standard price" for all fish as buyers are suspicious of whether their competition is really paying for quality or just using this premium as an edge to buy more fish. Besides the legal implications, fish buyers have never been able to police themselves on any issue in the past and will never be able to in the future either.

FORESEEABLE IMPACTS OF PROPOSAL

1. The end user will get consistent, good quality products and pay accordingly.

HALIBUT ASSN. OF NORTH AMERICA  
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Page 3

2. Fishermen will be put on a level playing field because all fish must be handled identically.
3. Buyers will also be forced onto a level playing field where price is the only issue....someone willing to accept sub-par fish no longer has this "edge".

ARE THERE ALTERNATIVE SOLUTIONS?

Every scenario we can think of, such as: shorter openings, staggered openings, halibut as a by-catch, etc., won't work as long as fishermen are forced into being non-competitive with their neighbor and a buyer exists that will accept sub-standard fish.

SUPPORTIVE DATA AND OTHER INFORMATION

Very difficult to quantify quality issues from the marketplace. Our association members continue to: have quality complaints from customers, see unacceptable fish show up in their steaking value added processing, and see fish come across their docks that are worse than halibut delivered in the 1970's that averaged 18-19 days old.

Thank you for your time and consideration of this proposal. Please help us get the quality of one of Alaska's oldest fisheries back to where it should be.

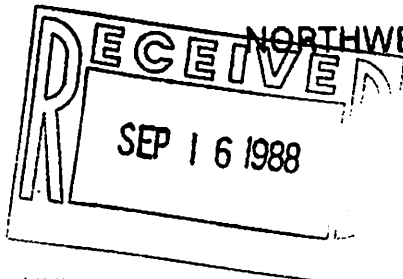
HALIBUT ASSOCIATION OF  
NORTH AMERICA

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RGH:pbl



Trustees  
Terry Bertson  
Brad Boroughs  
Arnie Einmo  
John Martin  
K Nakamura  
Ted Otness  
Garl Rowland  
Neil Todd  
Mark Westphalen



# NORTHWEST FISHERIES ASSOCIATION

INCORPORATED 1951  
SUITE 311  
2208 N.W. MARKET STREET  
SEATTLE, WASHINGTON 98107  
(206) 789-8197

September 9, 1988

Officers  
Jack Mercer  
President  
Barry Lester  
Vice President  
Dale Sherraw  
Secretary  
Leon Morrow  
Treasurer  
Greg Bloom  
Executive Director

Mr. James O. Campbell, Chairman  
North Pacific Fishery Management Council  
605 West 4th Avenue  
Anchorage, Alaska 99501

Dear Mr. Chairman,

The Northwest Fisheries Association is concerned about the quality of halibut being received from fishermen that has not been dressed, bled and iced properly. We feel there is no doubt that the current fishing frenzy in the halibut fishery results in lessened fish quality with an accompanying lowering in market value. The market should be able to take advantage of a healthy resource that would benefit all parties from the fishermen to the consumer. The potential is certainly not being achieved at present.

Although we don't have a ready-made solution for the problem, we support the recommendations of the Halibut Association of North America. They have proposed that a landing law be enacted that would require all halibut to be dressed, bled, and iced as soon after catching as possible. When delivered all halibut would be required to be dressed and recorded as such on the fish ticket. In addition, the halibut would be required to match certain chilling requirements before being sold to the buyer.

We realize the complexity of the problem and the efforts the Council has made to affect a change. Nevertheless, we cannot afford to let the situation continue another year especially in light of the competition in the whitefish markets for good quality product. We urge your action during the September Council meeting.

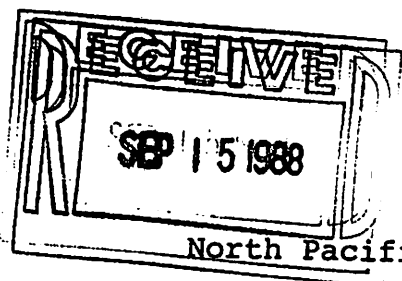
Very Truly Yours,

Gregory N. Bloom

GNB:slf

MEMBER





PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA

Name of Proposer Central Bering Sea Fishermen's Association  
St. George Fishermen

c/o Tanadgusix Corporation  
PO Box 88  
St. Paul Island, Alaska  
99660  
Attn: Perf Pletnikoff

c/o St. George International  
P.O Box 230049  
Anchorage, Alaska 99523  
Attn: Merrilee Lyons

Telephone (907) 546-2312 and/or (907) 561-3243

Brief Statement of Proposal. Halibut Regulatory Area 4(c) shall be a local fishery area. Fishing within area 4(c) will be established with a 10,000 lb trip limit until 80% of the quota is taken. Vessel clearance between openings will remain as in the past. The fishing season shall commence on June 21 and close September 1. As in the past an increase in quota will be requested of IPHC.

Objective of Proposal. The 4(c) sub area was created originally for one purpose--to provide Pribilof small vessel fishermen an opportunity to commercially fish halibut at a scale appropriate to the size of the developing small boat fleet on the islands. Due to boat size, and other limitations imposed by weather and sea conditions around the Pribilofs, residents had a difficult time under past IPHC regulations because that body accepted no authority in establishing regulations that were allocative in nature. As a consequence, although the 4(c) area was established at a small radius around the Pribilofs to create a special regulatory area with economic benefits for

residents, larger vessels fished the area, consuming the majority of the quota in a few openings, and thus deprived weather-restricted, capacity-limited smaller boats a fair access to the fishery. Lacking both in boat size and experience, the local fishery had great difficulty in establishing itself as a reliable income source because of the small portion of the quota received. The objective of Pribilof fishermen, as in the past, has been: 1) Providing a steady supply of fresh halibut to market through extending the number of openings for small boats in a longer season; and, 2) to harvest a larger share of the quota in the 4(c) area, which was the sole purpose for creation of 4(c); and, 3) to support developing local plants and local economies.

Need and Justification for Council Action. Since allocative decisions by IPHC have been deemed of questionable legality, the matter of local fisheries obtaining a fair access to resources was placed before NPFMC in 1987-88. The Council debated the issues and accepted its responsibility, while avoiding the exclusive registration issue. It forwarded a recommendation last year to IPHC that a 10,000 lb trip limit be placed on the quota in 4(c) until 50% of the quota was taken, and that vessel clearance between openings be maintained in 4(c). The intervention of NPFMC provided a dramatically improved fishing opportunity for Pribilof fishermen last year and local fishermen met the challenge by taking more halibut than ever before, with some fishermen making boat payments for the first time in several years. The season lasted from June 20 to July 22, including 16 openings. Together with NPFMC endorsed trip limits, provident good weather, and the tolerance of the outside fleet, the local small boat fleets of St. Paul and St. George landed 484,000lbs. out of the total 4(c) harvest of 700,000lbs. This season represented the first time since the inception of the fishery and the 4(c) area that the local economy was able to obtain more than half of the quota in the area that was established to assist these economies in 1982.

Thus the need and justification for NPFMC action is premised upon the precedent that NPFMC acted in 1988, with strikingly beneficial impact on the local economy, for which Pribilovians are grateful. The access problems to the resource can be predicted to resume if NPFMC action is not repeated for the 1989 season.

Other Channels to solve the Problem. 1.) Leave the issue to IPHC, which did not address it for six years, and which NMFS has recommended against). 2) Request the Secretary of Commerce to use its authority to promulgate emergency regulations, an option which is not good for either NMFS, NPFMC or the fishery.

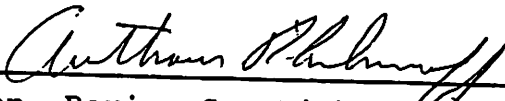
Forseeable impacts of the Proposal. Despite great concern within the fishing community outside of the Pribilof Islands before implementation of the 1988 IPHC regulations, the impact of allowing the local small boat fleet a shot at the 4(c) quota were primarily noticable in the St. Paul and St. George fish-plants and among local fishermen. The large vessels had black cod openings and large areas for alternative harvesting, while good weather made for a record breaking season for the locals. The total quota in 4(c) was less than one percent of the halibut quota under IPHC jurisdiction, so that adverse impacts to the rest of the fleet can hardly be seen as severe impact. The increased percentage sought here will enhance a locally developing fishery, that, thanks to NPFMC action last year, has been given a new lease on life.

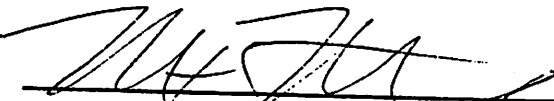
Are there Alternative Solutions. The alternative solution to provide a growing Pribilof fishery and a strengthened local economy is to administer the 4(c) area as an exclusive registration area, thus guaranteeing the local communities an access to Bering Sea halibut resources. The issue of guaranteeing access to resources will continue to become a more important one locally as the Pribilof Island community harbors reach further stages of development in their Congressionally mandated

switch to economies based on the Bering Sea resources.

Supportive Data and Other Information

See attached.

  
Cen. Bering Sea Fishermen Assoc.

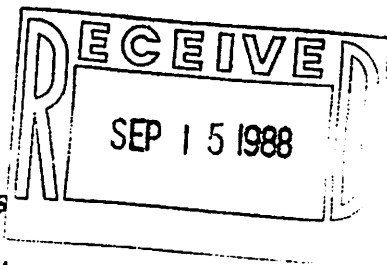
  
St. George International

LOCAL ECONOMIC IMPACT OF HALIBUT FISHERY  
ON PRIBILOF ISLAND COMMUNITIES

	St. Paul	St. George
1. Number of Boats Fishing	12	10
2. Number of Fishermen	40	20
3. Pounds of Halibut Taken	346,754	139,000
4. Number of Employees Local Plants	24	12



FOOD  
SERVICES  
OF  
AMERICA™



SEPTEMBER 15, 1988

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

COMMENT ON PROPOSAL FOR HALIBUT FISHERY MANAGEMENT.

I AM MAKING THE ATTACHED PROPOSAL AS THE SEAFOOD SPECIALIST FOR FOOD SERVICES OF AMERICA. OUR BUSINESS IS FOOD SERVICE DISTRIBUTION. IN FACT WE ARE THE LARGEST PRIVATELY HELD FOOD DISTRIBUTION IN THE NATION. WE SERVICE OVER 3000 ACCOUNTS FROM THE BRANCH IN WHICH I WORK AT, KENT WASHINGTON AND ALSO SERVICE FOURTEEN OTHER STATES FROM OUR THIRTY PLUS OTHER BRANCHES.

SINCERELY,

RICK MILTON

18430 E. Valley Hwy.  
Kent, WA 98032  
(206) 251-9100

P.O. Box 3547  
Seattle, WA 98124



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: RICK MILTON FOOD SERVICES OF AMERICA Date: SEPTEMBER 15, 1988

Address: 18430 EAST VALLEY HWY, KENT, WA 98031

Telephone: 251-1477

Brief Statement of Proposal: I SUPPORT THE CONCEPT OF INDIVIDUAL TRANSFERRABLE QUOTAS (ITQ). A QUOTA TO BE DIVIDED UP BETWEEN FISHERMAN BASED ON THEIR INDIVIDUAL HISTORICAL CATCH. I BELIEVE THIS HISTORY SHOULD GO BACK AT LEAST FIVE YEARS. I ALSO BELIEVE THAT SERIOUS THOUGH SHOULD BE GIVEN TO ONLY ALLOWING THESE QUOTAS TO BE OWNED BY FISHERMAN.

Objectives of Proposal: (What is the problem?) THE PURPOSE OF THEIR PROPOSAL IS TO IMPROVE QUALITY AND AVAILABILITY. THE MARKET COULD BETTER INTERACT WITH FISHERMEN, IE. NOT ALL FISHERMAN WOULD HAVE TO FISH AT THE SAME TIME. CONCEIVABLY, WITH THE SMOOTHING OUT OF PRODUCTION QUALITY TO THE MARKET COULD BE MINIMIZED AND PRICE TO THE FISHERMAN COULD BE OPTIMAL.

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

THE COUNCIL CONTROLS WHO GETS TO FISH AND WHEN. I SEE THE PROBLEM AS TOO MANY FISHERMEN. MY GUESS IS THAT THIS SOLUTION WILL BE THE EASIEST TO IMPLEMENT, POLITICALLY AND FINANCIALLY.

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

WINNERS WOULD BE THE CONSUMERS WHO COULD POTENTIALLY GET BETTER QUALITY HALIBUT OVER A GREATER PERIOD OF TIME THAN PRESENTLY. FISHERMEN SHOULD ALSO BENEFIT BY BEING ABLE TO FISH WHEN THEY CAN MAXIMIZE THEIR PROFIT AND BY NOT BEING FORCED TO FISH ON A SPECIFIC DATE WHEN WEATHER WOULD BECOME A FACTOR.

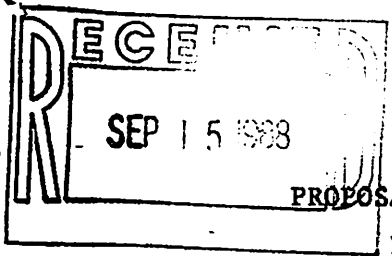
Are There Alternative Solutions?: If so, what are they and why do you consider your ~~proposal~~ the best way of solving the problem?

Supportive Data & Other Information: What data is available and where can it be found?

Signature:



33A/AL



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: Jon Rowley Date: 9/15/88

Address: Fish Works! Fishermen's Terminal  
C-10 Bldg.  
Seattle, WA 98119

Telephone: 206-283-7566

Brief Statement of Proposal:

See Attached.

Objectives of Proposal: (What is the problem?)

See Attached.

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

See Attached.

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

See Attached.

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

See Attached.

Supportive Data & Other Information: What data is available and where can it be found?

See Attached.

Signature: H. Morgan Hulse / Jon Rowley

# Fish Works!

Fishermen's Terminal  
C-10 Building  
Seattle, Wa 98119  
(206) 283-7566

Proposal submitted by Jon Rowley of Fish Works! in the Call for Proposals for regulation of the halibut fishery off Alaska.  
September 15, 1988

## Statement of Proposal

Establish a system of Individual Transferable Quotas (ITQs). ITQs would be issued initially to fishermen (license holders) based on a five-year average catch. The total allowable catch of ITQs could not exceed 80% of the quota established by the International Pacific Halibut Commission (IPHC). Twenty per cent (20%) of the quota would be set aside for by-catch, juvenile mortality, and discretionary allocation by the North Pacific Fishery Management Council (NPFMC).

ITQs, once issued to fishermen, would be freely transferrable. Under the ITQ system, halibut could be taken at any time of the year. Fishermen would fish at their own discretion.

## Objectives of Proposal

The fleet has grown rapidly from a few hundred vessels to over 6,000 vessels, necessitating 1-day fishing periods to prevent overharvest. With 24 hours to fish, a fishermen's primary motivation is maximizing poundage. Quality, conservation, and traditional courtesy on the fishing grounds are sacrificed in the frenzy to get gear up and down.

Problems associated with status quo management:

1. Excessive waste of juvenile halibut.
2. Considerable amount of cut and lost gear left on the bottom each opening resulting in resource waste.
3. Inexperienced crews on vessels and in plants resulting in less professional industry handling practices.
4. Inability and/or unwillingness of crews to dress and ice halibut in a timely manner resulting in substantial quality loss and inconsistent quality in the overall production.
5. Many fishermen are bringing in round halibut resulting in poor quality and a higher incidence of nematodes in the flesh.
6. Limited availability of fresh halibut to consumers.
7. Inconsistent quality of fresh and frozen halibut to consumers.
8. Retailers unwilling to buy halibut without quality consistency and dependability.
9. Restaurants reluctant to use halibut as a printed menu item.

Call for Proposals  
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Page 2

10. Diminished market identity and demand for halibut resulting in year-end inventories of poor quality frozen halibut which confuse the market when fresh halibut becomes available.
11. Reduced economic value of the fishery.
12. Disruption of traditional fishery practices.

#### Need and Justification

NPFMC has authority and responsibility for socioeconomic aspects of the halibut fishery.

#### Foreseeable Impacts (Enumerated)

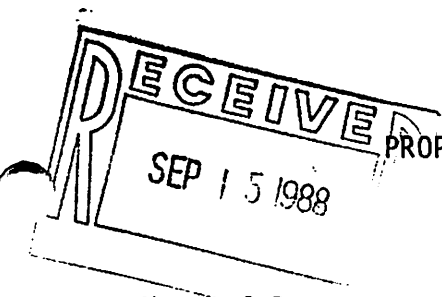
1. Timing and flow of product would tend to suit market conditions.
2. Close relationship and better communication between harvesting sectors and the market place.
3. If ITQ system were instituted in other fisheries like the sablefish fishery, fishermen could land several species simultaneously, reducing by-catch problems and maximizing economic return.
4. Year-round availability of fresh halibut.
5. Improved on-board handling practices resulting in better quality, better market acceptance, higher economic value, and broadened tax base.
6. Professional fleet.
7. A more manageable fishery.
8. With no advantage to running more gear than necessary, less gear would be left on the bottom, thus reducing waste.
9. Substantial increased use of halibut by restaurants.

#### Are There Alternative Solutions?

Because of the number of vessels in the fishery, it appears no other solution would eliminate the pulse nature of the fishery.

#### Supportive Data

Numerous recent articles document the problems in the status quo fishery.



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Date: September 14, 1988

Name of Proposer: Thomas Hoffman  
Vice President Distributor Operations Western Division  
Booth Fisheries Corporation

Address: Pacific Fish/Booth  
P.O. Box 3592  
Seattle, WA 98124

Telephone: (206) 382-4624

Brief Statement of Proposal: Change the halibut fishing season from the present method of short, 24-hour openings to individual fishing quotas based on historical catch or length of boat, with a season from May 1st through October 31st.

Objectives of Proposal:

1. Stop wasting this valuable resource. It is estimated that 25% of the allowed catch is lost due to fish drowned at the close of the opening.
2. Provide uninterrupted, top quality, Alaskan fresh halibut from May through October.
3. Improve the quality image of both fresh and frozen Alaskan halibut.
4. By stopping the waste and spoilage, the amount of fresh and frozen halibut available to a protein hungry world should increase. Our present regulation is an environmental tragedy.
5. Reduce the strain and peak work load on processing plants in Alaska to an even flow and steady employment throughout the summer.
6. Reduce loss of life by permitting fishermen to fish for halibut when weather is calm.

Need and Justification for Council Action: This problem must be resolved by the North Pacific Fishery Management Council in conjunction with the International Pacific Halibut Commission. It is obvious that the present system of shorter and shorter openings has only resulted in greater and greater waste, spoilage, and carnage in Alaskan waters. It is time that this resource is properly managed before it's present mismanagement becomes a national scandal.

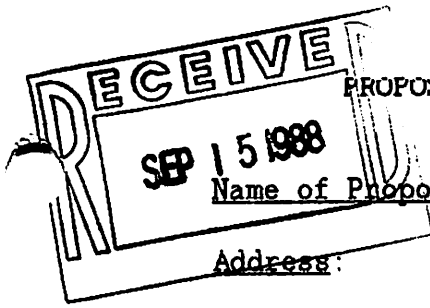
Foreseeable Impacts of Proposal: Everybody wins under this proposal: fishermen, processors, freezers, distributors, supermarkets, restaurants, and, most importantly, the consumer.

Are There Alternative Solutions?: Probably, but a longer season, combined with individual fishing quotas is the best solution.

Supportive Data & Other Information: International Pacific Halibut Commission

Signature:

cc: Don McCaughran, Director International Pacific Halibut Commission, Seattle, WA



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALAKSA  
North Pacific Fishery Management Council

Name of Proposer: Kenneth M. Duffus Date: September 14, 1988

Address: 10052 Baffin Street  
Eagle River, AK 99577

Telephone. (907)243-7017 (days), (907)694-2359 (eve)

Brief Statement of Proposal:

The NPFMC should halt registration of any new vessels entering into the fishery and limit future vessel licences to vessels that have landed Halibut during the last four years.

Objectives of Proposal: (What is the problem?)

Due to the number of vessels presently fishing Halibut there is an increase in the wastage of the resource, fatalities and loss of property

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

The council is the authority for the allocative and socioeconomic decisions affecting the resource. In order to enact such decisions the council needs to be able to effectively control the fishing effort to be but forth in harvesting the resource. Such action can be taken by the council but may also be complemented by the State of Alaska(ADF&G). Continued unrestricted access to the fishery increases the risk to the fishermen, wastage of the resource and loss of property.

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

Wins: Existing vessels in the fleet. Loses: New vessels trying to get in to the fishery.

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

1. Limiting the licences for gear.
2. Restriction of vessels to specific fishing areas.
3. Restricting fishing off Alaska's waters to resident Alaskan's.
4. Reducing the number of existing vessels fishing to a set number.

My proposal would create the least impact on the existing participants while providing through attrition the loss of vessels participating in the fishery.

Supportive Data & Other Information: What data is available and where can it be found?

- IHPC - Vessels licensed in the fishery
- ADF&G - Gear licenses
- Bureau of statistics - Number of deaths from fishing

Signature: Kenneth M. Duffus

RECEIVED  
SEP 15 1988

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: MEGS TESTARMATA

Date: 12 SEPT 1988

Address: BOX 124  
SEWARD, AK. 99664

Telephone: 224-5261

Brief Statement of Proposal: CHANGE THE METHOD OF ALLOCATING THE QUOTA. RATHER THAN LIMITING THE TIME TO CONTROL THE CATCH, ALLOCATE INDIVIDUAL QUOTAS TO EACH BOAT AND INCREASE THE TIME OF EACH SEASON (E.G. 1 WEEK) TO ALLOW BOATS TO FISH WITHOUT TAKING RISKS IN BAD WEATHER.

Objectives of Proposal: (What is the problem?) THE LENGTH OF OPENINGS HAS DECREASE RAPIDLY IN THE PAST SEVERAL YEARS AND IS REACHING THE CRITICAL POINT WHERE THE CATCH CAN NOT BE ACCURATELY CONTROLLED BY 24 AND 12 HOUR OPENINGS. THE QUOTA COULD BE EXCEEDED IF WEATHER COOPERATES. IN POOR WEATHER, FISHERMEN EXPEND CONSIDERABLE TIME AND ENERGY FOR LITTLE RETURN. THE CURRENT SYSTEM IS NO LONGER EFFICIENT. (CONTINUED ON ATTACHED SHEET)

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

THE PROPOSED CHANGES ARE UNDER THE JURISDICTION OF THE COUNCIL AND IPHC.

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

WHO WINS: THE SMALL BOAT FISHERMAN WHO CAN'T FISH IN ROUGH WEATHER CAN WAIT OUT THE WEATHER AND STILL FISH.

ALL FISHERMEN WHO WILL NOW HAVE THE TIME TO PICK UP ALL THEIR GEAR AND LESS WASTAGE OF FISH ON ABANDONED GEAR MEANS A LARGER QUOTA TO CATCH.

THE CANNERIES WHO WILL BE ABLE TO HANDLE THE LOAD BETTER IF IT IS SPREAD OUT OVER MORE TIME (CONTINUED ON ATTACHED SHEET)

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

KEEP THE SHORT OPENINGS, BUT ADD A LIMIT PER BOAT. THIS SOLVES THE PROBLEM OF KEEPING THE CATCH WITHIN THE QUOTA, BUT DOES NOT HELP THE PROBLEMS OF ABANDONED GEAR AND WASTED FISH, EXCESSIVE RISK TAKING, POOR QUALITY FISH, OR INCENTIVES TO JUMP THE CLOCK.

Supportive Data & Other Information: What data is available and where can it be found?

Signature: Margaret M. Testarmata



Objectives (continued)

PROBLEMS ARE:

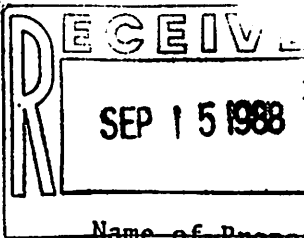
1. FISHERMEN ARE TAKING RISKS BY WORKING WITHOUT SLEEP AND FISHING IN MARGINAL WEATHER BECAUSE OF THE SHORT SEASONS. THE RESULTS ARE MORE ACCIDENTS AND SINKINGS.
2. POOR QUALITY FISH BECAUSE MOST FISHERMEN WILL NOT TAKE TIME DURING THE SHORT OPENINGS TO CLEAN AND ICE THE FISH.
3. WASTED FISH DUE TO GEAR BEING LEFT ON THE GROUNDS.  
WASTED FUEL AND ENERGY FOR THE FISHING BOATS THAT GO OUT AFTER THE OPENING TO RETRIEVE ABANDONED GEAR.

FORESEEABLE IMPACTS (continued)

WHO WINS: THE CONSUMER WHO WILL HAVE A HIGHER QUALITY FISH BECAUSE THE FISHERMEN WILL HAVE TIME TO CLEAN AND ICE THEM WHEN THEY ARE CAUGHT, AND THE CANNERIES WILL BE BETTER ABLE TO PROCESS THEM AS THEY ARE UNLOADED.

WHO LOSES: THE FISHERMEN WHO ARE WILLING TO TAKE RISKS LOSES IN THAT HE PROBABLY WILL GET A SMALLER PERCENTAGE OF THE CATCH THAN NOW—WHEN HE IS REWARDED FOR TAKING RISKS. HOWEVER HE WINS IN THAT HE IS LESS LIKELY TO TAKE RISKS ONCE THE INCENTIVE IS GONE AND THEREFORE MORE LIKELY TO KEEP HIS LIFE AND HIS BOAT. ALSO BOATS IN DISTRESS WILL BE MORE LIKELY TO RECEIVE AID FROM OTHER VESSELS WHEN THE RESCUE VESSEL DOES NOT HAVE TO MAKE A CHOICE ABOUT ABANDONING HIS FISH AND GEAR. UNDER THE PROPOSED SYSTEM, HE WOULD HAVE TIME TO PICK IT UP LATER. THERE IS NOT THAT OPTION NOW.

THE FISHERMEN WHO LAY GEAR EARLY OR PICK IT UP LATE LOSE BECAUSE THEY NO LONGER GAIN AN ADVANTAGE BY SUCH MANUEVERS.



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA

North Pacific Fishery Management Council

Name of Proposer:

Philip R. Wiley - (Longliner)

Date: 9-4-88

Address: Box 115, Sitka, Ak 99835

Telephone: NONE

Brief Statement of Proposal:

Limit The Boats: To Qualify a permit holder must have fished halibut in 1985, 86, 87, all four years. ALSO Limit the gear: Outlaw Fiked Gear and Circle Hooks. Replace with Snap on with (J) Hooks Only. Automation now or in the future, 2000 tons per boat max. Then try PHC: 20,000, 5000, 1000, for 24 hour openings.

Objectives of Proposal: (What is the problem?)

Too Many Boats, Too Much Gear in the Water, Poor Quality Fish, Short Season, Lower Price.

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

The Problem might be Resolved if Longliners only were Involved.

Foreseeable Impacts of Proposal: (Who wins; who loses?)

The Processor and Fisherman Win. The consumer and Processor Employees. Also crew member. Who loses?

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

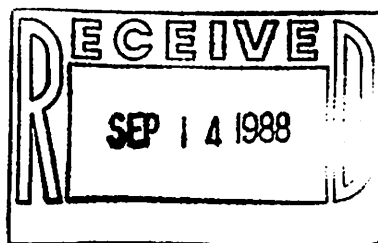
Transferable Quotas (IFQs) is a very dangerous system because a very few people or corp or? could buy the whole fishery. And problem would. I don't see there is other way but what?

Supportive Data & Other Information: What data is available and where can it be found?

Common Sense

Signature:

Philip R Wiley



PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA

North Pacific Fishery Management Council

Name of Proposer: Robert E. Allen

Address: Box 1049, Sitka, Alaska 99835

Telephone: 747-8100 747-5111 747-8941

Brief Statement of Proposal: To manage the Halibut resource as a year round, fresh market, higher valued product without the loss of boats and fishermen due to weather as under the present program.

Objectives of the Proposal: (what is the problem?) Short openings fished without regard to the weather causing sinkings and drownings. A product delivered in bulk, poorly handled, needing overtime to process and swamping freezer facilities. A product that remains frozen for long periods, hurting quality, and receiving lower prices on the market.

Need and Justification for Council Action: (why can't the problem be resolved through other channels?) As limited entry is the only thing that has been tried and it generates a permit system that gives the fisherman a feeling of security, plus a permit to sell, they feel if they wait long enough limited entry will be put in place. The bad known is often preferable to the unknown. There

is also no one but the NPFMC who can make the decision and  
make it happen.

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

Wins--Fishermen. Fish under better weather

conditions--better price for fish--better quality--larger,

more qualified crews--stability in the fishery.

Processor--Receives better quality fish--not pressed for

processing time and can produce shelf ready fish or

finished products--Doesn't need to tie up vast dollars on

buying or storing, thus improving his cash flow.

Consumer--Fresh quality fish always available.

Losers--Large cold storage warehouses.

Supportive Data & Other Information: What data is

available and where can it be found? All available from

past licensing, deliveries, and information used to

presently regulate fishery.

Signature  
Capt. Robert E. Allen

A. Use of a Gear Limit.

B. To make the maximum use of the Halibut resource without causing the endangerment of fishermen and vessels, during short, must fish or lose openings and to maximize the value of the resource through fresh fish being put on the market at the best price possible.

C. To keep the Halibut fishery from going to limited

entry as the Salmon troll fleet has. When the troll fleet went limited entry, the old fleet was replaced with new, more efficient, larger vessels which put more pressure on the resource. This forced short openings, heavy

deliveries, and the bulk of the fish having to be frozen. Because of the short openings, most of these vessels have now entered the Halibut, Blackcod and rockfish fisheries, causing short openings here also. Almost all of our fish is now frozen, and it becomes harder to compete with

imported farm raised fish delivered daily to the U. S.

D. 1. Put fresh Halibut on the market year around.

2. Increase value to fisherman by 100%.

3. Allow fisherman to fish under better weather

conditions.

4. Allow fisherman to target one or two species all

Year.

5. Bring more young people in to learn the fishery.

6. Better control of the resource to keep fishing

pressure on the good areas and allow marginal areas to

rebuild.

7. Allow more fishing time each day by not having too

much gear in the water, thus allowing more innovative

programs to be used such as the release without harm of

all 150 lb. and over breeding fish and retention of the

quality eating fish.

8. By having boats stay in the Halibut fishery year

around and not have to jump into all the other fisheries

to survive.

Alternate methods of management of the Halibut fishery

1. Gear limit—as proposed.

2. Limited entry

A. For

1. Easiest to initiate, as criteria has been

developed for the troll fishery.

B. Against

1. Will perpetuate short openings.

2. Fisherman will have to jump between fisheries to

survive.

3. Massive gear requirements to be effective during

short openings.

4. Poor quality control.

5. No control on weather, fish or be left out.

6. Larger boats to overcome weather factor needed.

7. No control of volume of fish caught during each

opening, requiring stop and go fishing to arrive at quota.

8. Mainly frozen market available, lowering price

received by fisherman.

3. Trip limits on poundage allowed per boat.

A. For

1. Ability to spread landings over longer season.

2. More openings would allow more fish on the fresh

market, allowing better price.

B. Against

1. If limit is too small, large boats will not come into the fishery.

2. Price will not be as high as on a fresh market fishery.

3. Heavy volumes having to be frozen, will not allow development of fresh fish exports by air.

4. Once gear is set, if a boat has set too much and achieves his quota early, many fish will be wasted as they are released.

5. Inexperienced crews will be hired for the short openings.

6. Good fisherman will move to other fisheries that have longer fishing periods, hoping to make a year around living.

7. There will always be cries of unfair as to what boat is allowed what poundage, whether it is based on boat size, past history of landings, dependance on fishery, or whatever method is used to allocate poundage.

8. No incentive for young people to come into the fishery.

9. No incentive for anyone to have an interest in the fishery, if they know they can never be involved.

10. Continues necessity of jumping between fisheries to make a living.



11. No incentive to upgrade boats if you can't catch more fish without moving to another area. Many fishermen could use a larger boat to be involved in packing or other fisheries that require a larger boat but do not want to fish westward.

## A LIMITED GEAR FISHERY

1. The Halibut fishery would be managed as a sustained yield, year around fishery. Every boat involved would be limited to (X) skates with (X) hooks and allowed to fish year round, with certain limits on the gear. These limits would depend on the number of boats involved, area fished, and amount of resource available.

The Criteria could be developed in this Manner.

A. Determine amount of resource available by area.

1. This should be available from resource planning that has been in operation and is presently used.

B. Determine percentage of resource to be used.

1. Same source as A.

C. Determine how much was caught by area in past .

1. How many boats were licensed.

2. How many boats actually fished.

3. How many skates were licensed.

4. How many fishermen were licensed.

5. How many Lbs of fish were caught

6. How much time were the skates fished to fill  
quota.

D. Using the above information determine how many lbs

per skate per day can be expected

1. Determine the number of skate days needed to fill

the quota. (at this point if the total number of boats

that fished last year was divided into the skate days, it

would seem that on a year around fishery each boat would

receive less than one skate. It must be remembered that

every boat from every other fishery was involved in the

Hailbut openings and no competitive fishery was going on

at the same time. This would change on a year around

fishery.

E. How to determine skates allowed per boat per year.

1. All boats must register in September for the

following year. Any boat not registered at that time

cannot fish.

2. You register by the year with a month by month

breakdown of months to be fished.

a. A particular boat might register this way

Jan. Not fish, on vacation

Feb. Not fish, scheduled repairs in boat yard.

Mar. Fish

Apr. Fish

May. Fish

Jun. Not fish, going for black cod  
Jul. Not fish, salmon trolling  
Aug. Fish  
Sep. Not fish, salmon trolling  
Oct. Not fish, Black cod opening  
Nov. Fish  
Dec. Not fish, King Crab opening.

3. Each boat is locked into their registered times.

At the end of Sept. the list by area is compiled.

At that time it will be found that a large

percentage of fishermen that fished the short openings are not available for an extended fishery with limited gear. As observed in past years these fishermen became involved because of the short openings and ability to place large amounts of gear in the water.

a. School teachers

b. Charter boat operators.

c. Trollers

d. Dungeness crabbers.

e. Fish packers.

f. Plus anyone that only had to take a few days off a

regular job and had any type boat.

4. When the breakdown is made the formula would probably show more like this.

a. SE Alaska- 10 skates per boat

b. Gulf- 20 skates per boat

c. Westward 30 skates per boat

d. Bering Sea 35 skates per boat

5. This could then be refined on a monthly basis

according to the sign up to insure an equal catch per

month to satisfy the fresh market so the highest price

would be received by the fishermen.

6. Once the base was established it could be refined to

allow larger boats to have more gear.

a. Each boat is allowed base skates + one skate per

crew member. This would allow large boats to have more

crew and ensure a safer, less tedious operation without

splitting a smaller crew share.

b. Areas to westward where less boats fish would draw

large boats because of a higher base figure, plus larger

crews, allowing them more gear.

c. Local areas where mostly local, small boats have

fished would be left to them, as a large boat that had a

base 30 would not want to fish an area of base 10.

7. Determine how much fish are caught on a timely basis.

a. Phone in daily by all processors to central computer as to poundage and area.

b. As the fishery is aimed at the fresh market, trips will automatically be shorter, thus giving catch data on a timely basis.

d. If a vessel decides not to fish a month as scheduled, it will notify a processor by the middle of the preceding month. Any month dropped cannot be picked up later. His skate base is redistributed to the remaining boats for the next month. This would stop boats from jumping around and causing too much change in base for skates, and pounds caught.

e. Charts and logs furnished to each boat to be turned in at the end of each month, logging every skate set as to number of hooks, soak time, hook type, bait, catch per skate, loran coordinates, etc. This would be privileged information for management to determine future base calculations.

E. Management and protection

a. A users fee of about 3%, virtually like the trollers pay for their hatcheries, would be collected.

This would be used for personnel and computer time to keep

all data up to date. This charge should be sufficient to insure data is current so maximum yield and fishing time for each area is insured.

b. To keep a vessel from fishing more gear or time than allocated.

1. Periodic checks on gear in water.

2. 1st. offense--\$25,000.00 fine.

3. 2nd. offense-- Loss of gear and license for boat and crew for one year.

4. 3rd. offense--Loss of gear, boat and permanent loss of boat license and crew licenses.

This was effectively used in the seine fishery about 1960 to stop creek robbers.

F. Benefits to the Fishery, Fishermen, Processor and Consumer.

1. Fishery

a. Control of resource to provide sustained yield.

b. Ability to control fishing in separate areas so fishing is not concentrated on known hot spots. Boats would have time to prospect areas not usually fished. New fishing areas would be found, thus spreading out the gear effort even more.

c. Innovative practices; like release of all fish

over 150 lbs; thus keeping the breeding population high

and only putting on the market the quality eating fish.

d. Restrict all hooks to unclad iron; so a released

fish with a hook left in its mouth would have the hook

rust away in one or two months. This way; ganglions could

be cut and the fish's mouth would not be torn out when

released.

e. Return to cotton ganglions; so lost gear would

self destruct in a short time and not ghost fish.

f. Restrict bait to herring; thus forming a market

for herring carcasses from the herring roe fishery. This

would enhance the value of the herring; stop waste in that

fishery; and stop the use of rock fish and other species

being used for bait.

g. Use incentives i.e. two extra skates for a year

for a boat that pioneers a new area that develops into a

new producing area.

## 2. Fishermen

a. Able to gear up for only one type of fishery; thus

cutting the massive gear costs now common.

b. Can fish when weather conditions are best, rather



than fish or lose under the present situation.

c. If involved in other fishery, he can plan his year to make maximum use of his boat.

d. Less gear to be pulled each day, giving more time to clean and properly care for his catch. Top quality will insure top value.

e. Because of bonus skate for each crew member, there is no benefit to run shorthanded. Boat crews being larger would spread out the work. There would be less accidents or bad judgement calls made because of a tired crew.

f. With no advantage to running shorthanded, new employment is created. A stable year round fishery would create year round jobs. This would keep knowledgeable, skilled, and safer workers involved, making the whole fishery safer. The present method of picking anyone, skilled or not, off the streets would end.

g. It would give a viability to the fishery on a long term basis. Decisions could then be made on investing in a new boat, rebuilding an old one, buying a home, moving to a new town. A life style with a future would be created.

### 3. Processor.

a. Able to look and plan ahead.

b. Smaller work force, but on a year around basis, providing a stable, local, skilled work force.

c. Time to process fish for a maximum salable product. Filets, prepackaged shelf ready, smoked, dried, etc.

d. Time to develop fresh markets with guaranteed delivery.

e. Ability to block out airline space ahead for shipping. i.e. Alaska Airlines, Japan Airlines, Korean Airlines etc.

f. Cut down on overtime, savings could be passed on to the fishermen.

g. By rotating money faster, the need to borrow and pay interest on vast amounts for up to a year would not be necessary. A better cash flow would develop which would benefit both the processor and fishermen.

f. Cutting out cold storage rental fees for up to a year at a time would increase profit to processor and fisherman.

#### 4. Consumer

a. Fresh product.

b. Better quality

c. Always available.

7. General observations.

A. A year round fishery would force Canada to adopt the same system. This would stop their practice of opening

two weeks earlier than ours, thus getting a better price and glutting the fresh fish market.

B. Stop Halibut fishing from going limited Entry, and creating the same problem it created in the troll fleet.

These problems are:

1. There are still the same number of boats in the fishery.

2. Old boats were replaced by new, larger more efficient boats.

3. The increased efficiency caused shorter openings.

4. Because of the long closures, the boats spread to other fisheries to make a living.

5. Because of the increased fishing pressure the other fisheries had to go to short openings.

6. We have now developed a series of short, shotgun openings, generating massive quantities of poorly handled fish all arriving at the processors at one time. With no time for quality, the processor freezes and ships to cold storage warehouses to save his product. This fish must then compete on the market with farm raised fresh fish

imported from Norway, etc.

C. If one fishery would adopt the gear limit system

this could possibly reverse the limited entry trend, which

has not proven workable.

1. It has not removed boats from the fishery.

2. It has not created a local fleet.

3. It has stopped young people from coming into the

fishery, as they cannot afford a permit.

It has created a privileged class of people holding

permits because of a matter of timing, not because of

investment, skill, or ability.

4. It did not decrease the fishing pressure.

5. It increased the fishing pressure by replacing

small boats with larger, more efficient boats.

D. Limited gear worked in the past.

1. During the late 1950s and early 1960s King Crab

fishing in Alaska was regulated as a year around fishery

limited to 30 pots per boat. As the processors would not

buy crab when they were soft shell, during that period the

boats went for dunnage, packed, or fished salmon or did

maintenance. The boats had time to prospect, so only the

best areas were fished and the gear was always being

moved. Marginal areas were left alone and any area that

started to become overfished was left to rebuild. As more boats came into the fishery, new areas were found to fish in, and pressure was decreased on areas that had become marginal. The end of limited gear fishing for crab did not come from any problem with this system. It came directly from the results of the 1964 earthquake and tidal wave. During the tidal wave and storm four days later, we lost most of the crab fleet. The federal government came in with massive doses of disaster relief funds. Anyone who had lost a vessel was eligible to borrow low interest money to replace his boat. The boats that replaced the old fleet were larger and more costly to operate. As a result, to keep the fleet viable, the pot limit was raised to 60 and then taken off altogether. Without the Gear limit, larger and larger boats came into the fleet with some boats fishing 600 pots. We now had one boat that could fish as effectively as 20. It was no secret to the fisherman that the bust was coming, but if these were the rules, they all hoped to get theirs before it happened.

This trend of unlimited gear in the halibut fishery is following the same pattern. You must have a larger boat, and more gear if you are going to compete. By limiting the gear this pattern will be broken, and instead of concentrating on large volume and low price, the

Halibut Fishery Proposal  
Robert E. Allen  
Page 13

fisherman can produce a quality, high valued product. The total poundage caught will remain the same, but the value of the poundage will double.

I have been a resident of Alaska, since 1950. Starting in 1951, I operated a fishwheel in Nenana, drying salmon for human consumption and for dog food. For three years, while in high school I produced about five ton of dry fish each year. I served in the army, and worked construction during the next four years in the Fairbanks area. I moved to S.E. Alaska, in 1958 and fished Dungeness and King Crab in the Juneau area until late 1961, when I moved to Kodiak. I fished King Crab in the Kodiak area until spring 1964, when the earthquake and tidal wave put us all out of business. I spent the next two years working construction in Kodiak, putting in fill for the new processing plants, and the following year I had a salvage contract on the Kodiak Navy Base. In 1967 I bought a marine railway and boat yard in Sitka. During the following twenty two years, I have improved the property, putting in a 60 ton travelift, with boat storage for 35 boats to 65 feet, built an 800 ton marine railway for barge repair, built a 400 ton floating drydock, and 19

(907) 747-8100 747-5111 747-8941

Sitka, Alaska 99835

Box 1049

Capt. Robert E. Allen

RESUME

Halibut Fishery Proposal  
Robert E. Allen  
Page 3

years ago started a marine sightseeing business. This business has two 65 ft boats, and a 78 ft. boat. I also started boat building, building the 78 ft. steel boat we use in the marine tour business. Two years ago I built two 78 ft. Aluminum, Waterjet powered catamarans. Last winter I built a 100 ft. Aluminum waterjet powered catamaran. We sold one of the 78 ft. cats, and have the other one and the 100 footer working in Juneau, hauling silver miners to Youngs Bay, For the Greens Creek Mining Co. Because of my association with fishing in Alaska for so many years, and direct contact with fishermen in our boat yard for the past 22 years, I have had the opportunity to study the fishery. I have watched the rise and fall of limited entry in most of the fisheries, and observed the changes to the fishermen and to our boatyard. The short openings have affected our operation, much as it has theirs. Our yard now is plugged or empty, depending on which short opening is happening next. Different types of gear, and bait sheds fill every storage area available, and half a fishermen's time is now spent moving gear on and off their boats instead of fishing. I have fished under limited gear, and enjoyed a year round fishery with no pressure to risk my life because of weather, knowing I could fish the next day or next week. I have lost many friends and customers to the bad weather because they were forced to fish. The system I have outlined is workable in



the Black Cod, Rockfish, Crab and Salmon fisheries. If  
this limited entry trend can be reversed, we can again  
have a fishery which is viable.

I have included my phone numbers, and feel I have much  
more information that would be useful to put a program  
into affect. If you felt it was worthwhile, I could  
attend your meeting, at my own expense in Anchorage, to  
answer questions or furnish background information.

Thank you for your time.

Sincerely yours,

*Robert E. Allen*  
Captain Robert E. Allen

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: Moses Johnson

Date:

Address: 423 Verstovia Ave  
Sitka, Alaska 99835

Telephone: 747-8133

Brief Statement of Proposal:

Limit halibut skates - to make it fair  
so many skates per man on each boat.  
Fewer skates, longer season

Objectives of Proposal: (What is the problem?)

Resource is being wasted with no limit on gear. Skates being left poor quality halibut-

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

Havent seen any changes to correct problem

Foreseeable Impacts of Proposal: (Who wins; who loses?)

Original halibut fishermen wins. Longer season better quality. Other fishermen would go back to own type of fishery

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

To late for limited entry

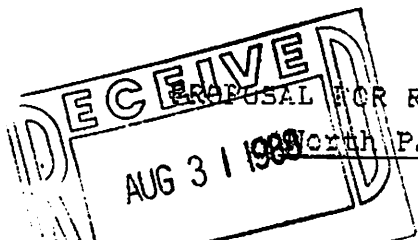
Supportive Data & Other Information: What data is available and where can it be found?

Signature:

33A/AL

Moses Johnson

T/V Karen Lee



Name of Proposer: Atka Fishermen Association

Date: 8-25-88

Address: Atka Rural Branch  
Atka, Alaska 99502

Telephone: (907) 839-2249

Brief Statement of Proposal: The Atka Fishermen's Association is requesting additional halibut openings for the months of June and July in area 4B. (see attachment)

Objectives of Proposal: (what is the problem?)

The objective of this proposal is to insure that the small boat fishermen in Atka get a fair chance to harvest a reasonable amount of halibut prior to the August opening.

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

Last year a proposal similar to this one was presented to the IPHC, and it was turned down by the IPHC because they said it had allocative implications. They told us to approach the NPFMC during the next halibut amendment cycle.

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

The Atka Fishermen in area 4B would have a chance to harvest a reasonable amount of the resource prior to the August fishery. This would also spread out the halibut landings in 4B, over a longer period of time, this would also give the IPHC and the NPFMC a better idea of the condition of the halibut stocks in area 4B prior to the August opening.

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

The Atka fishermen can't find an alternative short of creating a subarea in 4B. The solution we are proposing has been proven to work in the Pribilof region already, that is why the Atka fishermen would like to see that type of regulatory regime in area 4B for a portion of the quota.

Supportive Data & Other Information: What data is available and where can it be found?

Attached is:

1. Atka catch compared to entire area 4B
2. Background of Atka fisheries development efforts
3. Proposed halibut openings in area 4B

Signed,

*Mark Svinghoff*

**AFA**

**ATKA FISHERMEN'S ASSOCIATION**

ATKA RURAL BRANCH, ATKA, ALASKA 99502  
(907) 839-2249

(Attachment)

Proposed Halibut Opening For Area 4B

In addition to scheduled IPHC halibut opening AFA is requesting additional openings starting June 1989 the first weekend for 24 hours starting saturday morning and closing sunday morning.

Second weekend a 48 hour opening starting on friday morning and closing sunday morning, and one 24 hour opening each weekend starting saturday morning and closing sunday morning through the month of June.

For the month of July a 24 hour opening for the first weekend of July, opening saturday morning and closing sunday morning.

Second weekend of July a 48 hour opening starting friday morning and closing sunday morning and each weekend following a one 24 hour opening starting saturday morning and closing sunday morning until the end of July.

These openings will have a catch limit of 500,000 lbs. if the 500,000 lbs. is taken before the end of July then the short openings will be closed until the August openings.

500,000 lbs. limit will insure there will be an August fishery in area 4B.

In the event the 500,000 lb. catch limit is not caught by the end of July, then the unused portion of the quota will be added on to the August 4B quota.

Area 4B - Halibut Harvested  
1984-1987

Year	No. Days Open	Atka Catch	Total for Area	Percent for Atka
1984	17	46,545	1.0 mil.	4.65%
1985	15	72,188	1.3 mil.	6.02%
1986	3	7,886	1.7 mil.	.46%
1987	6	28,864	*1.75 mil.	3.36%

\*Quota for Area 4B. Actual amount of catch not yet available.

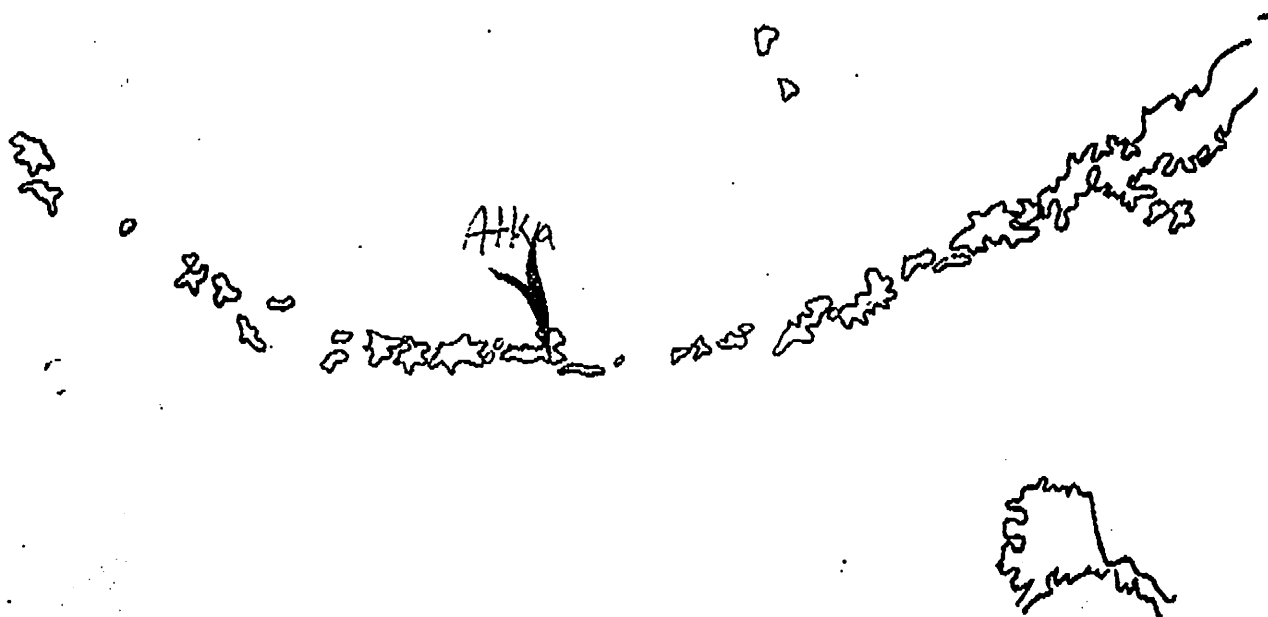
1988 - 28,218 lbs landed through August.

AUG 31 '88 14:22 ATKA 907 839 22330

P.2/3

## Atka Fisher. Development Efforts

Atka, Alaska is located on the eastern end of Atka Island in the western Aleutians. The island is sixty miles long and 30 miles wide at the widest point. Atka is the farthest west civilian community in the United States. Anchorage is the closest urban area and is located approximately 1,100 air miles to the east. Atka's closest populated neighbors are Nikolsk, approximately 200 miles east of Atka and Naval Air Station Adak 90 miles to the west. Figure 1 shows the location of Atka in relation to other islands in the Aleutian Chain and Alaska.



The halibut fishery is regulated by the International Pacific Halibut Commission (IPHC). The Commission sets a quota for the pounds of halibut caught and dates commercial fishing of halibut is allowed. There were to be 9 days open between May and August, 1986. During the first opening in May, poor weather prevented Atka fishermen from fishing and no fish were caught. During the second opening in late June and early July weather was again poor but Atka fishermen gave it their best effort and landed 7,888 pounds of

Atka fishermen encountered a problem in 1986. processed by AFA and sold through a Seattle fish broker. During the 1985 season 72,188 pounds of halibut were caught and processed a total of 48,565 pounds of halibut. During the 1984 season Atka fishermen in the community. The members of AFA have accomplished would provide employment for the adult work force residing fishery in Atka; and 2) develop a local economic base which The goals of AFA were to: establish a commercial fishermen. All labor was donated by local fishermen.

the processing facility and gear and gasoline for resale to provided funds to purchase equipment and supplies to prepare Corporation, the ANCSA Village Corporation. The loan interest (5%) loan of \$17,367 was obtained from Atkam into a temporary processing facility. A long term, low AFA to convert a combination cold storage/freezer building based upon bottomfisheries. The Atka Native Store allowed fishermen to work toward development of a local economy February of 1984 as a non-profit cooperative of local The Atka Fishermen's Association (AFA) was formed in







the processing and marketing side of the industry, a better - more uniform - quality product is assured; processors will not have the expense of hiring crews for a two day fishery and then have to lay them off for a month or so while waiting for salmon season to warm up (the savings will hopefully accrue not only to shareholders, but to fishermen, shore workers, and the community as a whole when more dollars are available). It is important to note the conservation effect. Incidental catch which must be discarded results in substantial halibut mortality. This mortality would be "saved" if legally landed under the OY. It should also result in a higher quota, since no deductions for mortality need to be figured.

POSSIBLE ALTERNATIVE SOLUTIONS: None worth looking at which are as fair, and which maximize returns to the nation.

SUPPORTIVE DATA AND OTHER INFORMATION: On this issue, we are certain that the Council has voluminous information. But if time permits, we will attempt to forward other arguments.



Earl E. Krygier  
Executive Director

15 1988

PROPOSAL FOR REGULATION OF HALIBUT FISHERY OFF ALASKA  
North Pacific Fishery Management Council

Name of Proposer: WAYNE LUSVIGSEN

Date:

Address: 6049 SEAVIEW AVE N.W.  
SEA, WA. 98107

8/9/8

Telephone:

Brief Statement of Proposal: REGULATE HALIBUT FISHERY BY  
MANY SMALL FIRMS & AREA QUOTAS OR BY  
INDIVIDUAL QUOTA LICENSES. - ALSO WORK  
W/CANADA TO PROVISIONS DON'T OVERLAP

Objectives of Proposal: (What is the problem?)

WITH ALL THE HALIBUT BEING PRODUCED  
ALL AT ONCE IT IS COUNTERPRODUCTIVE  
TO HIGH QUALITY PRODUCTION. FRESH HALIBUT  
IS ONLY AVAILABLE FOR A FEW WEEKS A YEAR

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

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

HOPFULLY EVERYONE WINS - I WOULD  
IMAGINE THE PRICE MAY BE SLIGHTLY  
HIGHER BECAUSE THIS MARKET WOULDN'T  
BE SO FLOODED ALL AT ONCE

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

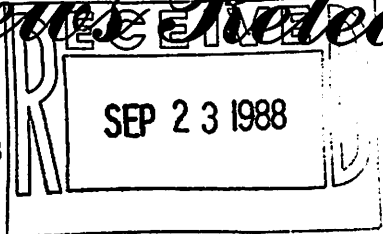
BUT WITH ALL FRESH PACIFIC HALIBUT COULD  
BECOME AVAILABLE - NEARLY YEAR ROUND

Supportive Data & Other Information: What data is available and where can it  
be found?

Signature:

Wayne Lusvigsen

*News Release*



September 19, 1988



1988 Halibut Landing Report No. 17

The International Pacific Halibut Commission (IPHC) estimates the following landings (millions of pounds) to date for Areas 2C, 3A, and 3B.

Area	Landings	Catch Limit
2C	10.7	11.5
3A	32.3	36.0
3B	5.1	8.0

P.O. BOX 95009, SEATTLE, WASHINGTON 98145-2009

Exec. Dir.	
Deputy Dir.	1
Admin. Off.	
Exec. Sec.	
Staff Asst. 1	
Staff Asst. 2	
Remaining Catch Limit	
0.8	
3.7	
2.9	

Areas 2C, 3A, and 3B to Reopen on October 3 with Fishing Period Limits

The IPHC has determined that fishing period limits will be required during the October 3 openings to avoid exceeding the catch limits. These areas will open on October 3 at 12:00 noon ADT and close on October 4 at 12:00 noon ADT. Fishing period limits by vessel class will be in effect. The limits for Area 2C are the same as for the September opening. The limits for Areas 3A and 3B reflect Conference Board suggestions adjusted by the anticipated fleet size to obtain the 6.6 million pounds remaining in the combined catch limit.

Vessel Class		AREA 2C	AREA 3A-3B
Length (feet)	Letter	Fishing Period Limit (Pounds-net weight)	Fishing Period Limit (Pounds-net weight)
0-25	A	800	1,600
26-30	B	1,100	2,900
31-35	C	2,000	5,500
36-40	D	2,700	8,400
41-45	E	4,000	11,100
46-50	F	5,800	23,600
51-55	G	6,000	26,900
56+	H	6,600	40,000

The appropriate length and letter for each vessel class is printed on each halibut license. Decals showing the letter have been supplied with the license and should be displayed on the vessel.

Areas 4A and 4B to Reopen October 3 with Fishing Period Limits

The IPHC estimates that after the September 16 opening there will be sufficient catch limit remaining to allow a limited fishery in Areas 4A and 4B. Therefore, these Areas will reopen on October 3 at 12:00 noon ADT and close on October 4 at 12:00 noon ADT. The fishing period limits will be the same as those for Areas 3A and 3B as shown above.

-END-

Donald A. McCaughran, Director  
 Phone: (206) 634-1838