

MEMORANDUM

TO: Council, SSC and AP Members
FROM: Chris Oliver *Chop*
Executive Director
DATE: March 20, 2012
SUBJECT: Halibut Management

ESTIMATED TIME
8 HOURS
All C-4 Items

ACTION REQUIRED

(b) Review CSP and take action as necessary

BACKGROUND

In October 2011, NMFS informed the Council that would need to revisit its proposed Area 2C and Area 3A Pacific Halibut Catch Sharing Plan (CSP) for the commercial and charter fisheries before NMFS would proceed with final rulemaking. NMFS cited policy and technical issues that compromised its ability to proceed to a final rule without clarification from the Council on those issues.

In December 2011, the Council reviewed a detailed NMFS report of 47 issues for which it was seeking Council guidance in order for NMFS to proceed with final rulemaking. The Council identified a two prong approach for responding to the NMFS October 2011 request for clarifications, and the NMFS December 2011 report, by requesting the following items from staff for review and potential action at its March 2012 meeting:

- 1) Supplemental analysis of new information since its 2008 selection of a CSP preferred alternative, and improvements to the Secretarial Review Draft Analysis in order for NMFS to proceed with final rulemaking.
- 2) Discussion paper to review the management matrix in the CSP Preferred Alternative, in terms of current charter halibut harvests and the CSP tier structure, particularly in Area 3A, in order to determine if the Council should adopt different management measures to achieve its goals in a revised CSP Preferred Alternative.
- 3) NMFS report as to whether the clarifications to six public comments it provided in December 2011 also would result in the need for a new proposed rule, so that a timeline can be established for implementing the CSP.
- 4) NOAA guidance on whether clarifications adopted in December 2011, or revisions to its CSP preferred alternative, would warrant publication of a new proposed rule; and
- 5) NOAA guidance on the use of a regional fisheries association to meet long term management goals and objectives under the CSP.

**DECEMBER 2011 COUNCIL STATEMENT
IN SUPPORT OF THE HALIBUT CATCH SHARING
PLAN**

The Council continues to support implementation of the Halibut Catch Sharing Plan (CSP) as the best approach to resolve longstanding allocation and management issues between the commercial and charter halibut sectors, as currently identified in the CSP Problem Statement.

The Council also recognizes that there are deficiencies in the current analysis that must be addressed before implementation can take place. Additionally, since 2008, changes in halibut management and the condition of the halibut stock have occurred, which will impact the effective implementation of the CSP as envisioned by the Council.

Agency staffs have organized the requested information into the following documents for review. Staff presentations will focus primarily on the Roadmap (Part 1), NMFS/NOAA General Counsel report on "logical outgrowth" (Part 2), and the CSP discussion paper (Part 4).

- Part 1. Roadmap document (Council staff) under Item C-4(b)(1)
- Part 2. NOAA guidance on rulemaking ("logical outgrowth") (NMFS/NOAA General Counsel staff) under Item C-4(b)(2)
- Part 3. CSP Supplemental analysis (Council staff) under Item C-4(b)(3)
- Part 4. CSP management measure matrix discussion paper (Council/ADF&G staffs) under Item C-4(b)(4)
- Part 5. NOAA General Counsel guidance on Regional Fishery Associations (NOAA General Counsel staff) – at meeting
- Part 6. February 22, 2012 Charter Management Implementation Committee report (Council staff) under Item C-4(b)(5)
- Part 7. March 27, 2012 Charter Management Implementation Committee report (Council staff)

At this meeting, the Council may (this is not intended to be prescriptive or limiting on potential action):

- Reaffirm its support for the CSP Preferred Alternative and NMFS would proceed to a final rule, incorporating supplemental analyses and Council staff responses to public comments, which were provided to NMFS separately;
- Take no further action on clarifications to public comments #1 through #6, which may require a new, focused proposed rule if any of the Council clarifications are deemed not to be a logical outgrowth of the July 22, 2011 proposed rule;
- Revise its CSP Preferred Alternative, which would require a new proposed rule (and perhaps a new analysis depending on the revision);
- Request additional analysis (e.g., hierarchical approach); and/or
- Initiate a trailing amendment to revise the CSP.

As separate motion(s) from the CSP action, since they would not be implemented in federal regulation, the Council may:

- Establish an annual review of ADF&G annual harvest projections by the Scientific and Statistical Committee
- Adopt the use of logbooks to monitor charter halibut harvest against its allocation targets (whether under the Guideline Harvest Level Program or the proposed CSP).

COMMISSIONERS:

JAMES BALSIGER
JUNEAU, AK
RALPH G. HOARD
SEATTLE, WA
LARRY JOHNSON
PARKSVILLE, B.C.
PHILLIP LESTENKOF
ST. PAUL, AK
LAURA RICHARDS
NANAIMO, B.C.
GARY ROBINSON
VANCOUVER, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

DIRECTOR
BRUCE M. LEAMAN

2320 W. COMMODORE WY, STE 300
SEATTLE, WA 98199-1287

TELEPHONE
(206) 634-1838

FAX
(206) 632-2883

AGENDA C-4(b)
Supplemental
MARCH/APRIL 2012

March 16, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Agenda Item C-4, Area 2C/3A Halibut Catch Share Plan (CSP)

Dear Chairman Olson:

The staff of the International Pacific Halibut Commission (IPHC) has become aware of a recent proposal to the Council by the Alaska Longline Fishermen's Association (ALFA) which, in essence, would make the halibut commercial and sport charter sectors each responsible for their own discard mortality. This approach, which they call Separate Accountability, would entail a change in the procedure in which fishery discard mortality, which we refer to as wastage, is accounted for in the IPHC catch limit setting process. The IPHC staff wishes to provide a supporting comment to the Council.

IPHC began estimating commercial fishery wastage in the mid 1980s, in response to reports of lost and abandoned gear caused by the short fishing periods, which resulted in increasingly large amounts of discard mortality of legal-sized, or O32, fish. Estimation of mortality of released U32 fish, which by regulation cannot be retained, was subsequently included to the estimation of commercial halibut fishery discard mortality. Similar estimates for halibut sport fisheries are currently lacking. However, the Council's recommendation and Commission's adoption of the U45/O68 reverse slot limit for the 2012 Area 2C charter fishery raises the issue about the need for appropriate information on sport fishery discard mortality. The Commission discussed this matter at its 2012 Annual Meeting, and directed staff to request the initiation of the necessary collection and estimation programs by state/federal agencies.

We believe it is very appropriate that each sector be held accountable and responsible for its discard mortality, so we support the ALFA Separate Accountability proposal. The current procedure for accounting for this mortality, i.e., inclusion in the Other Removals mortality, is based on IPHC's current role of determining the commercial fishery catch limit. Implementation of the Council's Catch Sharing Plan (CSP) changes the Commission's 'deliverable', insofar as providing a Combined Catch Limit for subsequent allocation between sectors. Should the Council agree with the Separate Accountability proposal, the Commission would be willing to revise its process accordingly.

Gregg Williams of the Commission staff will be attending the Council's meeting and can address any questions about our comments.

Sincerely yours,

A handwritten signature in black ink, appearing to read "B. Leaman". The signature is stylized with a large initial "B" and a long, sweeping underline.

Bruce M. Leaman
Executive Director

cc: Commissioners

Charter Management Implementation Committee

February 22, 2012

The Charter Management Implementation Committee would like to make a motion to state for the record.

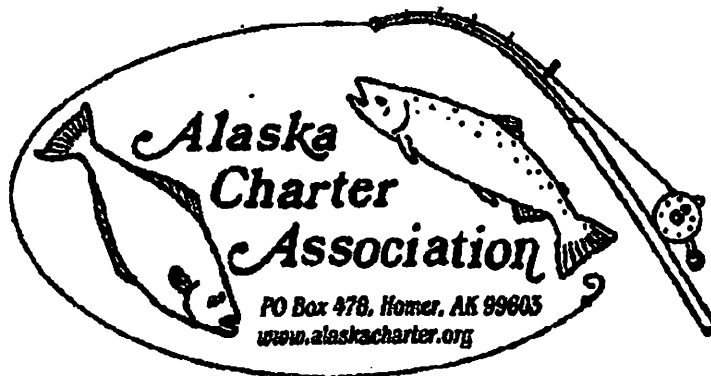
Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance.

The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

The motion is also endorsed by the following associations:

1. Alaska Charter Association (ACA)
2. Deep Creek Charterboat Association(DCCA)
3. Homer Charter Association (HCA)
4. Juneau Charter Boat Association (JCBOA)
5. Ketchikan Charter Boat Association
6. Kodiak Association Charter Operators (KACO)
7. Petersburg Charter Boat Association
8. Prince William Sound Charter boat Association (PWSCBA)
9. Southeast Alaska Guides Organization (SEAGO)
10. Seward Alaska Charter Boat Association (SACBA)
11. Sitka Charter Boat Operators Association (SCBOA)



"To preserve and protect the rights and resources of Alaska's Sport Fishermen."

Alaska Charter Association

Bryan E. Bondioli

Bryan E Bondioli, Treasurer

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance.

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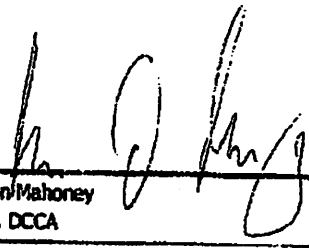


Deep Creek Charterboat Association

P.O. Box 423—Ninilchik, AK 99639

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

X  2/18/12
 Aaron Mahoney
 pres. DCCA

Homer Charter Association

P.O. Box 148 Homer, Ak. 99603


President: Gary Ault, Vice president: Donna Bondioli, Secretary/Treasury: Geri Martin,
Board Members: David Bayes, Phil Warren, Alternates: Scott Glosser, Joe Svymberski

The Homer Charter Association endorses the following motion.

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

Gary Ault, President

 2/19/2012

2012 Board of Directors
President - Richard Yamada
Vice President - Kevin Burchfield
Secretary - Grantley Moore
Treasurer - Ole Bartness



2012 Members at Large
Jack Cadigan
Chris Conder
Ed Haney
Louis Juergens
Chris White

February 19, 2012

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

The members of the Juneau Charter Boat Operators Association (JCBOA) have voted in favor of the above motion.

Sincerely,



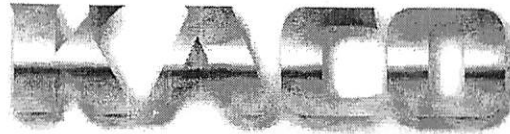
Richard Yamada
President

Ketchikan Charter Boat Association

Supports the Following Motion:

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.



**Kodiak Association
Charter Operators**

Kodiak Association Charter Operators

Supports the Following Motion:

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

Petersburg Charter Boat Association

Supports the Following Motion:

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

Stan Malen
President



PO Box 2850, Valdez, Alaska 99686

18 February 2012

To Whom It May Concern:

The Prince William Sound Charter Boat Association supports the following motion, as revised:

The Charter Management Implementation Committee unanimously wishes to share the following position of Alaskan halibut charter industry to the North Pacific Fishery Management Council: The participation of this committee does not constitute approval of the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to incorporate the current Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance. Any restrictive measures required should be established by the charter industry using best available science and data to stay within the GH. The CSP as well shall allow for incremental adjustment when and if the pool plan is developed.

The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

Sincerely,
Melvin Grove
//Signed//
President, PWSCBA



2/18/2012

Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance.

The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives. This participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

Heath E. Hilyard, Executive Director

A handwritten signature in black ink, appearing to read 'H. Hilyard', is written over the printed name.

Southeast Alaska Guides Organization (SEAGO)



February 19, 2012

Seward Alaska Charterboat Association

8340 E 11th Court
Anchorage, AK 99504

Jim Lee, President

A handwritten signature in cursive script that reads "Jim Lee".

Andy Mezirow, Past President
Member Charter Halibut Implementation Committee

A handwritten signature in cursive script that reads "Andy Mezirow".

Sitka Charter Boat Operators Association

PO Box 2422 Sitka Alaska 99835

February 18, 2012

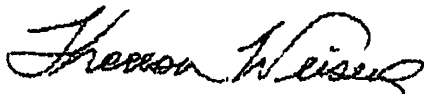
Motion:

The Charter Management Implementation Committee, representing the Alaskan halibut charter industry to the North Pacific Fishery Management Council, unanimously opposes the Halibut Catch Sharing Plan (CSP) as written. The proposed CSP allocations need to be adjusted to closely approximate the Guideline Harvest Levels allocation in Areas 2C and 3A that floats with abundance.

The committee recognizes that management alternatives in times of low abundance need to be explored further, and in this spirit, the committee will continue to explore these alternatives-this participation should not be interpreted as acceptance of the CSP. The committee appreciates the Council's recognition of the importance to modify the plan to minimize economic hardships in times of low abundance.

The Sitka Charter Boat Operators Association (SCBOA) has voted in favor of the above motion.

Sincerely,



Theresa Weiser
President
Sitka Charter Boat Operators Association (SCBOA)

Subject: SCAN0060.PDF Council testimony 1995

From: CRFBC@aol.com

Date: 3/20/2012 9:56 AM

To: seafa@gci.net, halibutcoalition@gmail.com, npfmc.comments@noaa.gov

Chairman Eric Olson,

Kathy Hansen,

Halibut Coalition,

This has been an issue since at least 1995 when I testified to the council in 1995.

Bill Connor

F/V Cape Reliant

— Attachments: —

Scan0060.pdf

2.8 MB

National Marine Fisheries Commission Testimony
Bill Connor

GOOD DAY, MEMBERS OF THE COMMISSION. FOR THE RECORD, MY NAME IS BILL CONNOR, I AM HERE TODAY REPRESENTING MYSELF AND THE CREW OF THE CAPE RELIANT, BASED IN PETERSBURG, ALASKA.

I HAVE FISHED FOR HALIBUT, BLACKCOD, SALMON, CRAB AND HERRING IN ALASKAN WATERS SINCE 1975. I AND OTHER LONGLINE FISHERMEN HAVE FOR DECADES PARTICIPATED IN RECOMMENDING QUOTAS TO PROTECT AGAINST OVERHARVESTING AND TO ENSURE A STEADY STOCK FROM WHICH TO HARVEST IN THE FUTURE. WE HAVE MONITORED OUR CATCHES AND REDUCED QUOTAS, AS NEEDED, TO SUSTAIN THE OPTIMUM YIELD.

LONGLINERS HAVE HAD TO ADJUST TO CHANGES IN THE COURSE OF THE FISHERIES DEVELOPMENT. FROM LONG, UNRESTRICTED SEASONS, WE VOLUNTARILY MOVED TO MANDATORY SEVEN-DAY LAYUPS, THEN TO SHORTEN SEASONS, AND FINALLY TO DERBY FISHING FOR TWO-TO-THREE DAYS A YEAR AS UNREGULATED FLEETS OF AS MANY AS 6,000 BOATS WENT WILD IN THE HARVEST.

PAGE 2

MOST RECENTLY, IN ORDER TO PRESERVE THE HALIBUT FISHERY, LONGLINERS VOLUNTARILY I.F.Q.ED OURSELVES, IN ORDER TO HARVEST THE RESOURCE AT A MORE RESPONSIBLE PACE.

ENTER THE PICTURE: A NEW USER GROUP WHOSE UNRESTRICTED GROWTH AND CONSUMPTION OF THE HALIBUT RESOURCE THREATENS THE ESTABLISHED COMMERCIAL LONGLINERS WHO HAVE WORKED SO HARD TO PRESERVE THIS FISHERY.

IF THE SPORT CHARTER FLEET IS NOT REGULATED, WE WILL SEE OUR EFFORTS TO PRESERVE THE HALIBUT STOCK UNDERMINED.

THE SPORT CHARTER INDUSTRY IS QUICK TO PLAY DOWN THEIR GROWING PRESENCE AND THEIR IMPACT ON THE ALASKAN FISHERIES. RECENTLY MEMBERS OF THE CHARTER INDUSTRY PROVIDED DESCRIPTIONS OF THE CHARTER FLEET AND THEIR RESPECTIVE CHARTER AREAS.

PAGE 3

THEY CONTEND THAT GROWTH OF THE CHARTER INDUSTRY IS CONSTRAINED BY THE LIMITED NUMBER OF AVAILABLE SLIPS, MARKET DEMANDS, ACCESSIBILITY AND AVAILABILITY OF HOTEL ACCOMMODATIONS. THEY PORTRAY THEMSELVES AS BEING "SELF-REGULATED," IF YOU WILL, BY VIRTUE OF INFRASTRUCTURE LIMITATIONS.

THAT IS SIMPLY NOT THE CASE. NEW LODGES ARE SPRINGING UP EACH YEAR IN SOUTHEAST ALASKA, BED AND BREAKFASTS, LAND-BASED AND FLOATING FISH LODGES. ACCORDING TO ONE RECENT NEWS REPORT ON THE CRUISE SHIP INDUSTRY, THE PREDICTION FOR THE YEAR 2,000 IS EIGHT MILLION PASSENGERS, UP FROM FOUR MILLION IN 1993, "WITH NO END IN SIGHT."

WITH THE ONE-SALMON-A-DAY LIMIT, YOU CAN BET A CHARTEREE WILL WANT TO TARGET ANOTHER SPECIES. AND, AS I HAVE HEARD FROM CHARTER OPERATORS AND SEEN WITH MY OWN EYES, THAT SPECIES OF CHOICE IS QUICKLY BECOMING HALIBUT.

PAGE 4

PASSING MANY TIMES THROUGH FREDERICK SOUND DURING THE PAST TWO SALMON SEASONS, I OBSERVED EACH TIME, CLUSTERS OF BOATS JIGGING HALIBUT ON THE TRADITIONAL HALIBUT LONGLINE SPOTS. THIS WAS A NEW SIGHT TO ME AND THE OTHER LONGLINE FISHERMEN.

THOSE SAME SEASONS, THE HALIBUT TAKE BY COMMERCIAL FISHERMAN IN FREDERICK SOUND WAS SIGNIFICANTLY LOWER THAN PREVIOUS YEARS. IN AREA 2-C OF FREDERICK SOUND IN THE FALL OF 1993, IT WAS EXTREMELY DIFFICULT TO REACH HALF OF THE 20,000 POUND TRIP QUOTA WITHIN THE TWO-DAY TIME LIMIT. DURING THE TWO-DAY 1994 FALL HALIBUT SEASON, THERE WAS NO QUOTA LIMIT, BUT THE FISHING WAS VERY POOR - 15,000 POUNDS WAS A BIG TRIP. YET, BOTH YEARS, JUST ANOTHER 60 MILES AWAY, WHERE CHARTER BOAT FISHING IS RARELY DONE, IF AT ALL, THE 1993 TRIP QUOTAS WERE EASILY REACHED, AND 1994 SAW RECORD TRIPS.

PAGE 5

THAT IS JUST ONE EXAMPLE, FROM ONE FISHING AREA IN THE STATE. HOWEVER, THE REALITY IS THAT AT PRESENT, NO ONE KNOWS WHAT IS REALLY BEING TAKEN BY THE SPORT CHARTER HALIBUT FISHERMEN. SURVEYS GET MAILED OUT. CREEL SURVEYS ARE TAKEN. BUT, AS ANY STATISTICIAN WILL TELL YOU, INFORMATION GLEANED FROM A VOLUNTARY SURVEY IS OF QUESTIONABLE VALUE. WHILE THE "BEST GUESS" HISTORICAL ESTIMATE HAS BEEN PEGGED AT FIVE TO SIX MILLION POUNDS OF HALIBUT PER YEAR, THERE IS VIRTUALLY NO VERIFIED DATA DOCUMENTING THE ACTUAL TAKE BY THE SPORT CHARTER FISHERMEN.

AS A LONGLINER, MY CONCERN IS THAT IF WE DO NOT CAP AND REGULATE THE TAKE OF HALIBUT BY THIS NEW USER GROUP, QUOTAS WILL BE OVERHARVESTED. AS YOU ARE AWARE, CHARTER QUOTAS COME OFF THE TOP OF WHAT'S AVAILABLE EVERY YEAR. AS QUOTAS BECOME SMALLER, THE SPORT CHARTER FISHERMEN'S PORTION WILL GET PROPORTIONATELY LARGER. AT THE PRESENT RATE OF GROWTH, CONCEIVABLY, THEIR TAKE COULD EXCEED THE HISTORICAL COMMERCIAL TAKE.

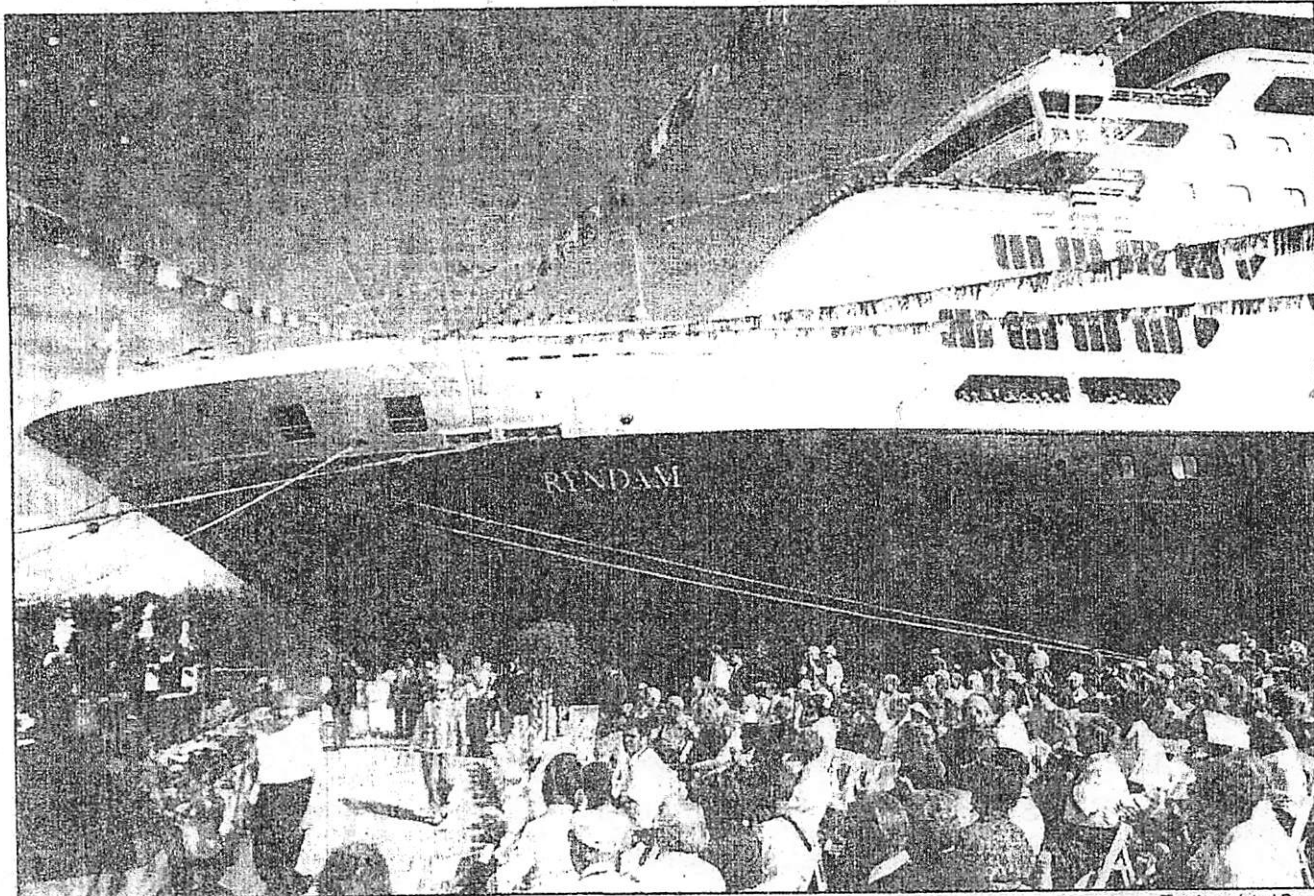
PAGE 6

THE RESULTING ECONOMIC IMPACT ON THE COMMERCIAL FISHERMEN, THEIR FAMILIES AND THEIR COMMUNITIES WOULD BE DEVASTATING. HOW CAN AN INDIVIDUAL, WHEN PURCHASING AN I.F.Q., BE SURE HE OR SHE CAN AFFORD THE RISK OF BUYING A PERCENTAGE WHEN THERE IS NO WAY OF DETERMINING AND CONTROLLING THE HALIBUT TAKE OF THE SPORT CHARTER USER GROUP.

IN CLOSING, I URGE THE COMMISSION TO ADOPT A CAP ON THE HARVEST TAKEN BY SPORT CHARTER FISHERMEN AT THEIR PRESENT HISTORICAL CATCH.

IT'S FAIR, IT'S EQUITABLE, AND ITS THE ONLY WAY TO PRESERVE THE LONGLINE HALIBUT FISHERY FOR FUTURE GENERATIONS.

FILE muphs BC



The Associated Press

CHRISTENING CEREMONY: Holland American Cruise Line's newest ship is the Ryndam, which set sail in October. Four cruise lines have \$1 billion worth of ship orders each.

Pleasure ship business is cruising

■ **Cruise lines:** Eighteen new ships are set for delivery by late 1997, including the two biggest liners ever made.

By Catherine Wilson
The Associated Press

FORT LAUDERDALE, Fla. — A crew on an elevated platform touches up the white paint near the ship's name. Installers spread their tools on a vibrant abstract-pattern carpet in a lounge. A contractor uses a laptop computer linked to a slot machine.

Adjustments are made with hours to spare before the maiden cruise of Holland America's Ryndam, heralding a three-year building boom for the cruise industry.

Four cruise lines have \$1 billion worth of ship orders each, influenced by industry projections that passenger counts will rise from 4.1 million in 1993 to 8 million in 2000. Eighteen new ships are set for delivery by late 1997, including the two biggest liners ever made.

"We'll have more ships than the Spanish Armada, or at least more beds," joked Rich Steck, a spokesman for Royal Caribbean Cruises Ltd. "We already know where the

gold is out there in passenger land."

More than just industry growth is feeding the building frenzy, a business dominated by shipyards in Finland, Italy, France and Germany.

The profit potential on more efficient ships, the availability of financing, favorable currency exchange rates and new safety rules mandating major renovations on older ships are playing a role in the boom.

"I don't think there's any end in sight," said Tim Gallagher, a spokesman for Carnival Corp. The company's 2,060-passenger Fascination began sailing in July, and Carnival has three more ships on order.

Holland America, meanwhile, has orders for two more ships, while Princess and Royal Caribbean each have four ships on order, and Celebrity has three.

Carnival and Princess have generated the most intrigue by promising 100,000-ton liners, the biggest ever built and vastly outdistancing the largest now at sea, Kloster Cruise Ltd.'s 76,049-ton Norway. The passenger capacity will be 2,600 on the ships, which are due for delivery in 1996 and 1997.

Carnival is paying \$400 million for its

megaliner. Princess, which is buying the other ship, isn't saying what it cost.

"I think we're pretty much pushing the outer limits," conceded Carnival chairman Micky Arison.

"It gets tougher and tougher to take advantage of that additional size."

The sleek, white Princess ship will feature three dining rooms instead of the standard two and a suspended nightclub reached at the stern through a moving walkway.

Most of the new ships are destined for Caribbean service, the world's biggest cruise market, a year-round option and the preference of first-time cruisers.

"The untapped potential in the Caribbean where we're putting more tonnage over the next several years we think is vast," Benson said. "Companies are going to need new, innovative, spectacular ships to attract those people and to keep them coming back."

But U.S. shipyards are getting only a small share of the building boom — although North America provides most of the cruise industry's passengers, the big liners are being built in Europe.

That trend is unlikely to change anytime soon.

Subject: SCAN0064.PDF
From: CRFBC@aol.com
Date: 3/20/2012 11:19 AM
To: npfmc.comments@noaa.gov, halibutcoalition@gmail.com, seafa@gci.net

Eric Olson,

I have testified before the council in 2008 when I was on leave back from Iraq. I am home now for good, but I did not get the future I had invested in. I came back with no job on a halibut boat and still a huge issue that the charter fleet is not under control.

My IFQ is 1/3 of what I purchased, and will not service my loan payment.

We need the CSP allocation that were set in 2008.

We need the CSP for it will tie both sectors to the same index of halibut abundance. This will ensure both sectors share in the resource conservation. The GHL won't work for me.

The CSP provides plenty of opportunity for QS transfer to the charter sector.

This is not the IRAQ war, but it sure has gone on longer. I need the stability.

Dustin Connor

— Attachments:

Scan0064.pdf

601 KB

CHAIRMEN AND COUNCIL MEMBERS
GOOD MORNING, ~~LADIES AND GENTLEMEN.~~ MY NAME IS DUSTIN

CONNOR, AND I AM REPRESENTING MYSELF IN FAVOR OF THE
~~HALIBUT COALITION.~~ A P RECOMENDATION

AS A 3RD GENERATION COMMERCIAL FISHERMAN, CURRENT
ALASKAN RESIDENT, AND OWNER OF 2C IFQ, I BELIEVE IT IS TIME TO
PUT AN ALLOCATION ON THE CHARTER SECTION QUOTA.

FOR THE PAST 3 YEARS AS AN IFQ OWNER OF 3500#, AND A
CURRENT LOAN OF \$72,000, I HAVE WATCHED MY ALLOTTED SHARE
OF THE BIOMASS DROP BY NEARLY HALF [47%], AS THE CHARTER
INDUSTRY GOES UNCHECKED. HOWEVER AS MY ALLOTTED SHARE
DROPS, MY INTEREST RATES AND PAYMENTS STAY THE SAME.

SHORTLY AFTER BUYING MY IFQ I LEFT FOR THE MARIN CORPS
WITH A STRONG SENSE OF DUTY AND PRIDE. I LEFT BELIEVING THAT
BY SERVING AND DEFENDING MY COUNTRY AS WELL AS MY FUTURE
WAY OF LIFE I WOULD HAVE A FUTURE TO COME BACK TOO.

IF THERE IS NOT A FIXED PERCENT ALLOCATION INSTILLED ON
THE CHARTER SECTION I AM AFRAID THERE WILL NOT BE A WAY FOR
ME TO SUPPLEMENT MY IFQ AS I CANNOT FISH YEAR ROUND AS A
MARINE. WHEN MY TOUR OF DUTY ENDS I FEAR I MAY NO LONGER
HAVE A FUTURE IN ALASKA IF THE CURRENT SITUATION GOES
UNCHANGED.

I UNDERSTAND THE COUNCIL HAS BEEN WORKING TO INSTILL AN
ALLOCATION, I HOPE ONLY THAT IT WILL BE DONE SOON AND PERMIT
IFQ HOLDERS ENOUGH RESOURCE TO KEEP THEIR INVESTMENTS
AND CONTINUE TO SERVE THEIR COMMUNITIES AND THE REST OF THE
NATION BY PROVIDING A SOURCE OF HEALTHY SEAFOOD TO THE
PUBLIC AT A FAIR PRICE.

**Submitter's
Representative**

Comments

Pass the proposed 2C halibut charter rule.

I have fished since 1991.

I am invested in the halibut fishery with a remaing debit of 70,000.00 dollars on an IFQ loan.

I abide by the quota that I own and take no more.

I am presently serving as a Marine for our country and plan on returning in 3 years to make my living in the halibut fishery with my family.

I am requesting your support at this time, as I am supporting our country for us at this time.

Pass the proposed 2C charter halibut rule so as I may come back to a future for which I am fighting for.

Sincerely
Dustin Connor

Attachments

Action

Note: If you wish to print your comment, please click the "Print" button.

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Subject: SCAN0063.PDF past testimony and letters

From: CRFBC@aol.com

Date: 3/20/2012 10:57 AM

To: npfmc.comments@noaa.gov, halibutcoalition@gmail.com, seafa@gci.net

Dear Chairman Eric Olson,

I have testified before you in 2008 at the age of 17, in the past written letters, and I write to you again.

I am almost 22 years old now I have fished halibut for my allowance, college tuition, and down payment for my house, and my IFQ purchase. At present I have to subsidize my IFQ payment with a job at McDonalds, yes the place with the golden arches. I never saw myself there but it is what it is.

So Mr. Chairman lets keep in place the CSP allocations the were set in 2008 it will provide a measure of stability to the halibut industry, I know I need it.

The CSP fairly ties both sectors to the same index of halibut abundance and ensures both sectors share in the resource conservation. The GHF put a larger burden on the commercial fleet when we have low halibut abundance.

The CSP will provide a way for IFQ to transfer to the charter sector.

The 3000 lbs I purchased at 72000.00 dollars is now 1024 lbs. This at 6.50 a lb at 50% share will net me 1/3 of my payment. There is a recession on my IFQ budget.

Please stick with the 2008 CSP. It is what it is.

Oh and if the charter sector is complaining about making ends meet, there are plenty of jobs here at McDonalds.

Tori Connor

— Attachments: —

Scan0063.pdf

1.5 MB

Council Chair Eric Olson,

My name is Tori Connor, I am 18 years old. I have commercial fished with my dad since 1998. This is how I make a living, pay my expenses, and collage tuition.

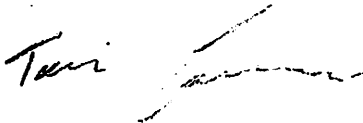
In 2007 I purchased 3000 lbs of 2c halibut with money I have been saving since 1998 from my deckhand earnings along with a loan at 7.5% interest that requires a payment every year for the next 10 years even if my quota is reduced by 50% or less of what I purchased.

This year 2008 the IPHC recommended a 27 % cut in the 2c halibut quota to insurer a future resource. My payment did not however go down 27%. I did not exceed my quota and I have not filed suit to guarantee my income.

Quota reductions are part of a process that follows the abundance of the resource; every user needs to respect the resource for longevity, not for immediate greed.

I ask the council to put the charter industry on their current GHL expressed as a percentage, and to tie it to abundance. The charter industry needs to be held accountable for their overages, and that means we need to have verifiable, real time catch accounting. If the charter industry needs more quota they should be allowed a leasing option of a limited amount of quota, some of my quota could be available.

Thanks
Tori Connor

A handwritten signature in black ink, appearing to read 'Tori Connor', with a long, sweeping horizontal stroke extending to the right.

**Submitter's
Representative**

Comments

I am 17 years old and have been fishing since I was 7.

Last year I purchased 3000 lbs of halibut IFQ because of the stability that I have expernced for 10 years. I am a 3rd generation member of a fishing family and our living has always been from fishing and especialy halibut fishing. We have worked within the halibut regulations for many decades, and have established our livley hood because of the stability that the halibut fihsery has had. By abiding by our quotas for many generations we have a very strong resource and fishery that one can make informed investment and living dececions.

At 17 my annual payment is 7200.00 dollars for the next 12 years My investment will deminish substancialy if the proposed rule for the 2C halibut charter industry is not implemented.

Please keep my investment in my future stable along with the community I live in. To lose 36 percent of my investment now because a new user group wants to go unregulated is just wrong.

Again please support the 2C proposed charter halibut rule.

Thank you
Tori Connor

Attachments

Action

Note: If you wish to print your comment, please click the "Print" button.

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Submit

Tori Oct 08 Amelsoya

Good morning, Council members. My name is Tori Connor, and I am in favor of the Halibut Coalition AP Recommendation

My entire life I have been a part of the fishing community it has become a life style for me and will continue to be a large part of my life, and the productivity of my fisheries will have an impact of what I do and achieve. My love for fishing inspired me to take a financial leap. At the age of 16 I took out a 72,000 dollar loan purchasing 3,000 pounds of 2C IFQ. At that current period I believed I was making a business decision that would last a lifetime. However this business investment is now being threatened by the over catch of the vast amount of charter boats.

I have worked for everything I have and plan on reaching all my goals, no matter how hard it is to get there. But I don't need the extra pressure of worrying about losing my investment to a greatly industry and the payments I will still be forced to make even if I no longer can catch my 2C halibut.

For this year alone I plan on putting a down payment on a house, pay for college, all my living expenses, paying for my IFQ and making future investments. I am using the money I earned from fishing this year, both seining and longlining. Also I work as a waitress during the

seasons I don't fish, however because of the reduction of my halibut quota this year, of 810 pounds, and the chance that out quota will be cut in the future, not only by the biologists but also the continuing overage from the charter industry. The means of reaching my goals for this year ^{will require me} ~~I am going to need~~ to get a second job, which will intern cut into my studies and prevent me from taking as many classes in college this year, setting me back for what I want to do in the near future.

I understand the significance of the biologists cutting the quota. We need to insure the halibut recourses for our future and the future of other generations. With that aside it's time the charter industry is put under an allocation, I realize you, the council have been trying to put one in place in the past, and thank you, ^{for} the future of halibut and our current jobs as commercial IFQ holders, I desperately hope it is put into affect soon. For people like myself who do not have the financial stability to take this blow and recover, our business and my future in Alaska counts on it. ~~to help try to get my life started.~~

Thank you for your time.

January 20, 2009

Dear Sue,

My name is Tori Connor; the fishing vessel I work on is the Cape Reliant, 58 ft. long and 23 ft. wide. I fish for a living, with my father and 4 other crew members, all who have families they support. By your support of implementing the 'one halibut a day' for the charter industry will help control their catch closer to their GHL and not allow them to double it time and time again. Time is running out and so are our halibut supply, these actions need to be made immediately, halibut is not a guaranteed asset and if it is continued to be over fished by the charter industry all quota investments will be lost, and those with pending loans will have debts with no feasible means of paying them.

I am an 18 year old college student who depends on the prospect that my investment in 2C halibut will continue to pay for itself while my other money earned goes to creating my future. I borrowed 70,000.00 and still owe 44,500.00 on my halibut quota; my college money I had saved up my entire life was used for a down payment on this. At the time it was a great idea, and still is if a stop is put to the abuse of the halibut resource from the charter industry.

The Economic impact of the 2C reduction over the last 3 years for me and my support dollars to the Petersburg community has fallen 41% I watched as my purchase of 3,000 lbs. of IFQ declined to 1,700 lbs. and alimented the need for an additional deckhand. In order to deal with my growing payment shortfall, I have taken on a winter job at 8.00 dollars and hour to help subsidize my IFQ payment and college tuition.

I support the IPHC in their quota reduction through science, believing in sustainability and a future resource, like it has been for over a century. I have never exceeded my quota allocation. Although my investment has dropped by 41% the charter industry's catch did not slow down. The charter fleet continues to exceed their GHL, allowing this will compromise the resource and future generations of Alaska. I believe the proposal is more than fair and equitable to all.

Please give us your support in the one Halibut a day with a consequence for exceeding the charter GHL.

Sincerely,

Tori Connor



Phone: (360)359-5861

E-mail: Connortr3492@yahoo.com

Subject: SCAN0061.PDF past charter letters
From: CRFBC@aol.com
Date: 3/20/2012 10:28 AM
To: halibutcoalition@gmail.com, npfmc.comments@noaa.gov, seafa@gci.net

Chairman Eric Olson,

I send these past letters along with a new one. As from the past letters it can be documented that this has been an issue since at least 1995. It is not only an issue in the halibut industry it is taking place at the Alaska state level for sablefish as well.

It seems like the charter industry is grabbing from historical fisheries in many places with disregard to the GHL system quota systems and historical dependence by fishing family's.

By all accounts the charter industry should be put on the same playing field as any fishing dependent entity. The council should allow the charter industry guided or unguided to purchase IFQ just like me and my kids have and my crew have. Get the charter industry to put some skin in the game, this should make them respect the system and the hard sacrifices the commercial sector has done for over 100 years.

The CSP that was set in 2008 should not be changed and this allows stability to the halibut industry.

The CSP puts both groups on a level playing field of halibut index abundance and makes both sectors share in the resource conservation. The GHL burdens the commercial fleet with conservation reductions during low abundance.

The charter sector skirts the GHL with the unguided trick of allowing the borrowing of their vessels and then gives them exact coordinates via GPS to an anchored buoy that marks hot halibut fishing. We need to keep this CSP as was set in 2008.

The CSP allows a mechanism for QS transfer. I support this component of the CSP.

With the quota reductions that have taken place I will have to lay off 1 and maybe 2 crew members that have been with me for 15 and 21 years. My current loan payments are 30% short for each of the last 3 years on average, and are subsidized with my salmon income.

It is time to end this entitlement grab.

Bill Connor

— Attachments: —

Scan0061.pdf

3.8 MB

Sue,

We really need to get this charter issue done. I have depended on the commercial halibut fishery for my livelihood since 1975. My first 25 years in the halibut fishery allowed me to feed my family and pay my bills; not true any more. The last 8 years have seen a constant battle with the charter industry's out right refusal to commit to its GHl or any conservation of the halibut resource. This is just out right greed and that is wrong.

I have invested over 200,000.00 dollars in the purchase of 2C halibut and have mortgaged my vessel buisness and other buisness assets that provide me with my annual living to support 2 elderly seniors and 4 immediate family members along with 4 additional crew members that have a total of 12 dependants. Thats 22 people.

I have seen in the last 2 years my 200,000.00 dollar investment fall too 66,000.00 because of the constant robbing by the charter industry of the halibut resource by exceeding their GHl and under reporting their halibut removals. My payments of 18,000.00 dollars a year on this halibut IFQ loan have not gone down as my allocation has gone down. In my foolish belief that NMFS was going to pass the charter controls 3 years ago I pushed my 2 kids into investing in IFQ each of them purchasing 3000 lb's (a 70,000.00 dollar investment for each a 16 and 18 year old) to only find out that they now can only harvest 1200 lbs. yet they obey the rules of staying within there harvest amounts although they still have the same 8000.00 dollar a year payment.

We in my family and crew have obeyed our harvest allotment for ever. We are now being punished for the purposeful theft of the resource and greed of the charter fleet. You must pass this charter guidelines today so we can put this issue to rest and move on with some assurance of our future and the futre of the resource.

Hold the charter harvest at the levels that NMFS has passed and also have real time harvest recording either with cameras on board their charter vessels or immediattely a punch ticket that records their landings for accuracey and protection of the resource.

Please do not let this greed become a meltdown of the halibut resource, like we are all feeling from the greed that caused the financial meltdown.

Thank you
Bill Connor

Attachments

Action

Note: If you wish to print your comment, please click the "Print" button.

Council members

I am a 2nd generation fishermen of 34 years. I have worked my way to boat ownership from the deck to the wheelhouse and now provide 5 Alaskan families with year long employment. I have invested in the IFQ system and have a debit in to 7 figures. Reallocation is not an option or some Alaskan family will be unemployed.

The charter allocation issue is about as old as the Exxon Valdez oil spill. As we all know this harmed all Alaskans. Through Exxon's continued exploitation of the legal system Exxon delayed punitive damages until the system changed to their advantage over the decades of appeals.

The charter industry is using the same play book as Exxon. To play the game any longer will be devastating to the Halibut resource the Alaskan resident the subsistent user and our community's and us small Alaskan family fishing business.

End it now base their allocation on their 2006 GHIL tie it to abundance on a percentage basis, allow them to lease up to 10 percent of my quota, hold them accountable with real time accounting.

Thank you
Bill Connor

MS Stephanie Madsen
Chair
NPFMC
605 West 4th Ave ,Ste 306
Anchorage, AK
98501

Stephanie I write urging you to adopt an effective measure to control the commercial charter harvest in area 2C to the GHL and to ensure that these measures are implemented in time for 2008. I would also urge you to move forward as quickly as possible with the same measure for area 3A. We commercial fishermen of the Connor family have asked the council for 14 years to stop the open ended reallocation of halibut from the commercial to the charter sector. Fourteen years is a very long time to wait, and my kids are now investing at age 20 and 16 are in the IFQ system and need the stability of a Council approved and passed measure that stops the charter allocation at there now current GHL. In 2006, the Council committed by unanimous vote to manage the charter section GHL until superseded by a long-term management strategy. Please keep that commitment so my business and my kid's investment are not jeopardized by the reallocation to the charter industry. Each sector needs to live within its allocation until a mechanism for compensated reallocation is established.

I further request with all the Connor family, and the crew of 5 that fish on my vessel, that the council convert the GHL to a percentage-based allocation that fluctuates with abundance and implement a mechanism that allows compensated transfers between the commercial and charter section. Demand for either sector will then dictate how the halibut will be caught. The percentage used must be derived from the existing GHL and all subsequent transfers must be between willing buyers and willing sellers. Finally, I oppose along with my crew of 5 and my two children entering the fishery any perminte revenue streams to the charter sector that would subsidize charter purchase of quota share, which is just a welfare program. Charter operators that want to increase their halibut harvest should pay,(just as my 16 and 20 year old are doing,) more for that opportunity.

I have invested as my kids in the halibut quota share program and fishery with the expectation that the resource will continue to be managed and that the Council will fairly balance the needs of all who depend on the halibut resource, from the aging baby boomers that are home bound and in walkers through the fishermen and processor. I respectfully request the Council to live up to that expectation.

Sincerely,
William Connor
Tori Connor
PRFC Dustin Connor
Po 1124
PETERSBURG AK 99833
And the crew of the Cape Reliant

5-7-07

Honorable Condoleezza Rice
Secretary of State
US Department of State (OES/O)
2201 C Street NW

I am writing to urge your support the action taken by the International Pacific Halibut Commission (IPHC) earlier this month.

Under the 1953 halibut convention between the US and Canada, the IPHC has the responsibility of managing the halibut resource to ensure sustainable harvest. This means taking management actions when necessary to stay within harvest objectives. The NPFMC implemented a guideline harvest level (GHL) for the guided sport sector in 2000, which was published in the federal register in 2003 and unanimously reaffirmed by the North Pacific Council NPFMC in April 2006.

The commercial guided sport industry exceeded this GHL in Southeast Alaska (2C) each of the past 3 years and at an increasing rate each year. In 2006 the overage was close to 50 % of the target. The southcentral Alaska GHL (3A) has been exceeded for the past 2 years. The IPHC action to reduce bag limits for guided sport clients to 1 fish for 2 to 6 weeks (depending on area) is simply a management tool to hold harvest to sustainable levels without making an allocative decision. In the absence of bag limit reductions, the GHL overages would once again be deducted from the longline quota, penalizing the industry that has remained below quotas set by the IPHC for a decade. That would be allocative and contrary to the principle of sustainable fisheries management.

The IPHC has clear authority to change the bag limit as needed to meet their conservation mandate. To date the longline fisheries have taken the hit on their bag limit in the form of IFQ quota reduction while the commercial charter industry has exceeded it for several years with no attempt to practice any conservation measures. Recreation bag limits were established by the IPHC in 1973, after legal counsel from both the Canadians and US governments determined that the IPHC had the authority to manage sport fish. These bag limits have been modified twice since then to address conservation concerns or changing stock conditions. The current bag limit modification is targeted to the commercial guided sport industry since only this sector is growing rapidly with no checks and balances to keep them from repeatedly exceeding established domestic harvest targets.

In January, the IPHC reduced the Southeast Alaska (2C) longline quota by 20% from the 2006 levels. Reducing the commercial guided sport bag limit spreads the burden of conservation measures across both sectors. The IPHC action provides an interim measure of stability until the NPFMC recommends and the Secretary implements a long term management strategy for the commercial guided sport halibut industry. This action is long overdue (see my included testimony to the NMFC in 1995). This action is long over due. Please ensure that the IPHC regulations are imposed, or take similarly effective action to control the commercial charter catch in time for the 2007 summer season.

Sincerely,

Wm Lunn
107 B Skylark
Petersburg Alc
907-772-9211 99833

Subj: support 2C GHL for charter boats
Date: 3/6/2008 4:56:04 P.M. Pacific Standard Time
From: CRF BC
To: cgutierrez@doc.gov

Secretary Gutierrez,

Again I write to you asking for your support in the rational plan for implementing a 2C GHL for the charter boat industry.

Since 2007 I have gone from a quota of 21,000 lb of Halibut that I purchased down to 13,000 lbs. Pretty unlucky number, and word has it that we will take another 20% reduction in 2009 leaving me with only 10,400 lbs of halibut to harvest, and service a 17,500.00 loan payment.

This 10,400 lbs is not what I based my loan on when I purchased my quota. My livelihood will have taken more then a 50% reduction and basic ends may be hard to meet. At this number the reality will be no payment to the bank on the 130,000.00 loan I owe. Reallocation without compensation to the charter industry is not an option for many of us QS holders I believe that if the 2C GHL is not implemented for the charter boat industry the financed 2C quota will go the way of the subprime housing debacle.

Back in 1996 I testified before the council that we need to cap the charter industry then. The charter industry at that time claimed that they were regulated by vessel moorage, accessibility, availability of hotel rooms etc. this simply has not been the case and the charter industry has ran rampant and continues to exceed there GHL with no consequence. Just for conservation reasons they need a limit.

All sectors that harvest Halibut need to be on a percentage adjusted basis, just for conservation measure.

I urge your support in changing the current GHL to a percentage that fluctuates with abundance. And in doing this so as not to disadvantage any group you should also support the leasing of quota shares to the charter industry from the commercial sector. This will allow them the chance to harvest as much fish as their cliental need.

Thanks for your support

Bill Connor
box 1124

**Submitter's
Representative**

Comments

The proposed rule for the 2c guided halibut charter industry needs to be enacted.

I have participated in the commercial harvest of halibut since 1975 and have based my living and future on its stability for some 30 plus years . I have a buisness that is totaly dependent on the stability of the fishery.

My investment in the fishery exceeds 2million dollars and has an outstanding debit of 1,300,000.00.

To allow continue eroding of my living by a user group that is not regulated is wrong.

The resource is fully utilized and all user groups need to beheld accountable.

By implemmenting the proposed rule it will help the established fisheries maintain stability and insure the health of the resource.

Please act in suppoting implementation on the proposed rule for the 2c guided halibut charter industry.

Sincerly
William Connor

Attachments

Action

Note: If you wish to print your comment, please click the "Print" button.

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Via fax to (907) 586-7557

Ms Sue Salvesson
Assistant Regional Administrator
Sustainable Fisheries Division
NMFS Alaska Region
ATTN: Ellen Sebastian
PO Box 21668
Juneau, AK 99802

Re: RIN 0648-AW23 Guided Sport Charter Vessel Fishery for Halibut

I urge you to implement option B for the guided port industry in IPHC Area 2C:

- One fish daily bag limit
- No harvest by skipper and crew
- Line limits
- Strict accounting of charter harvest, including adequate funding for logbook analysis, and active enforcement by both Coast Guard and NMFS.

These actions are necessary because of a reduced CEY and GHL caused by consistent overages by the guided sport charter vessels for the past four years. Overfishing by the charter fleet is a blemish on NMFS's record in Alaska that previously did not allow overfishing.

The problem caused by an unrestrained charter fleet have been known since 1993 – fifteen years. It is well past time for NMFS to show leadership and stewardship, and impose management measures on the charter fleet that will effectively constraint them to the GHL.

Sincerely,



Name:

Bill Connor

Address:

Box 1124

Petersburg Alaska

Date:

1-28-08

Sue, I am shure if one did a survey with Alaska Airlines, they would find that the charter fleet and their clients are shipping out at least twice what their GHL is annually. This is devastating to our resource and to the communitys and the commercial fleet that abides by their limits. This really should not come as a surprise to NMF this overharvest, but enforcement should be more astute to what is happening. Possibly by sending an informed letter stating under-reporting will be prosecuted at the Federal level same as an ITQ violation

Council members

I am a 2nd generation fishermen of 34 years. I have worked my way to boat ownership from the deck to the wheelhouse and now provide 5 Alaskan families with year long employment. I have invested in the IFQ system and have a debit in to 7 figures. Reallocation is not an option or some Alaskan family will be unemployed.

The charter allocation issue is about as old as the Exxon Valdez oil spill. As we all know this harmed all Alaskans. Through Exxon's continued exploitation of the legal system Exxon delayed punitive damages until the system changed to their advantage over the decades of appeals.

The charter industry is using the same play book as Exxon. To play the game any longer will be devastating to the Halibut resource the Alaskan resident the subsistent user and our community's and us small Alaskan family fishing business.

End it now base their allocation on their 2006 GHIL tie it to abundance on a percentage basis, allow them to lease up to 10 percent of my quota, hold them accountable with real time accounting.

Thank you
Bill Connor

Cape Reliant Fis

9-30-08

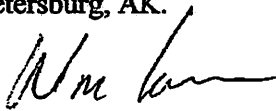
To The NPFMC,

Council members, I seek your help in support of maintaining the GHL for the commercial charter operators established in 2000. This GHL at that time provided 125% of their harvest at the time. In 1996 I testified at the Anchorage council meeting that we needed to adopt accountability and control of the potential explosion in the commercial charter fleet at that time. To be at the junction we are today is irresponsible especially in light of the fact, that as early as 1995 we knew that all the halibut quota was being harvested at this time.

I have harvested halibut since 1975 as a crew member and have harvested as a boat owner since 1980. Since 1975 I have abided by the quota established by the IPHC. In 1995 I invested in IFQ and as of today have spent over seven figures in the acquisition of IFQ. My investment along with my crew, the community I live in, and support all need to be credited with a stake in a GHL that is abided by the commercial charter industry. The commercial charter industry can, as all other business individuals, invest in their business by buying IFQ if they need more fish for their clients. To continue to reward the commercial charter industry overages without consequence sets a poor precedence.

My crew, my family, my community, the business that I support, and myself need your support NOW in maintaining the GHL established in 2000, the implementation of an effective harvest control measure for 2008, along with a mechanism for limited compensation reallocation that allows limited leasing of commercial quota to the commercial charter industry. The moratorium control date should stand as of 2005.

Thank you for your time
Bill Connor
Box 1124
Petersburg, AK.



3-15-07

To The Alaska Board of Fish and Game,

It must be recognized that our Chatham blackcod, Clarence blackcod, and SE blackcod fisheries have decades of historical catch data and that these stocks are fully utilized by our local families and communities. Our harvest group has developed a long range commitment financially AND THIS NEEDS TO BE PROTECTED. We have made commitments to our crews their kids our local business and communities all of which have come to depend on this resource harvest. In this financial melt down we all are experiencing dramatic destabilization of our own commitments and dependability on historical harvest income and commitment to our crews and our community's income. For the Board of Fish and Game to even consider any increase for the charter industries daily sport bag limit of this already fully utilized species would be similar to the inappropriate actions of AIG and their bonus fiascal.

The Board of Fish must stick to the approved daily bag limit plan at best, but to really keep historical stability in our local families business and communities it should lower the existing daily bag limit to 1 fish a day and 4 fish yearly. The Board should also at this time more clearly define sport gear that is used as hand deployed and hand retrieved exclusively and forever. The move by the charter industry to use high teck deployment and retrieval gear is constantly improving. By allowing any other gear than hand operated, ENFORCES SPORTS HARVESTING, and defeats the intent of sport fishing.

The Alaska Board of Fish and Game must stop reallocation and stick to the decisions made and at this time redefine sport gear as only hand cranked and hand deployed with no more then a 1:1 gear ratio keep it sport fishing.

Thanks
Bill Connor
Box 1124 Petersburg Ak.



3-27-09

To: The Board of Fish.

From: Bill Connor

I strongly oppose proposal 216.

Proposal 216 will cause me to suffer unlike the proposal 216 states.

There seems to be a continuing eroding of quota from several fisheries by the charter sector. The charter sector is nothing more than a commercial enterprise; it is time to call the kettle black.

I have paid for the right to fish in the two sablefish fisheries in Southeast. I have seen my quota reduced substantially over the years. Most likely from the unregulated take of sablefish, that reduces my annual quota by these other commercial entity's that do not have to pay in excess of \$300,000.00 dollars to participate along with an annual license that is around \$1,200.00 a year (what is the annual cost of a charter license, plus they are asking for no quota limit?). So to have the proposer of 216 state that makes no one suffer is far from the truth. MY QUOTA IS SHRINKING, MY COSTS ARE ESCALATING, MY INCOME TO SUPPORT MY CREW OF 5 AND THEIR FAMILYS IS BEING REDUCED CONSTANTLY BY THE UNREGULATED CHARTER INDUSTRY.

My suggestion would be to allow the commercial charter business to purchase the permit, LIKE ME, and allow them to support their clients catch from there permits allocation. Then I feel no one will suffer, we would gain better accountability from the sablefish stock removal's (good information that the Alaska Department of Fish and Game needs to establish annual sablefish harvest) by the charter industry, and perhaps better stewardship of the sablefish resource by all INVESTED participants. Presently we do not have any accurate idea of the charter harvest. However we do have an accurate harvest by the permit holders.

Bill Connor

Box 1124

Petersburg AK 99833

halibut CSP

Subject: halibut CSP
From: "richard" <u6mile@usa.net>
Date: 3/20/2012 10:28 AM
To: <npfmc.comments@noaa.gov>
CC: <halibutcoalition@gmail.com>

NPFMC Chair Eric Olsen

I'm writing to support implementation of the halibut CSP at the soonest opportunity. This is one necessary step toward a healthy halibut industry that can be accomplished NOW.

The CSP was proposed to provide stability to the halibut industry AND promote conservation. The CSP allocations might be modified later, but SHOULD NOT NOW BE CHANGED. The CSP ties both charter and longline to halibut abundance, and ensures both sectors share in resource conservation. The CSP provides a mechanism for QS transfer between individual commercial and charter fishermen. Additional reporting requirements to ensure success of the plan can and should be enabled later.

If and when the CATCH program becomes a feasible option, it could be incorporated into the halibut charter management plan. The CSP may be LATER adjusted for the CATCH program.

Since the 70's, my family has relied on halibut longline, mostly 2C, and the almost 80% quota cut (over the preceding 5 years) has been especially dissapointing in view of total lack of conservation by the charter industry.

Please enable the CSP now.

Thanking you,

Richard Boyce, f/v Eleanor S, Haines AK.

Halibut CSP (C4B)

Subject: Halibut CSP (C4B)
From: "Casey, Frank" <frank.casey@nmhg.com>
Date: 3/20/2012 11:09 AM
To: <npfmc.comments@noaa.gov>
CC: <hvpmaak@gmail.com>

Halibut CSP (C4B)

Comments on Current CSP allocations from:

http://www.alaskafisheries.noaa.gov/npfmc/PDFdocuments/halibut/CSP_312.pdf

Figure 6, page 37 shows the CSP vs. GHL, in every instance except High abundance levels the CSP takes away allocation from the charter sector and would place less than 2 fish per day restrictions on area 3A. We don't care about how much more fish we get in times of High abundance, its Low abundance levels that are critical to the charter operator. Changes in catch limits are really changes in allocation, reduce the limit and it reduces the number of clients willing to spend \$200+ for a day of fishing.

Table 2, page 40 shows that under the CSP from 2009 to 2011 (2012 also) the limit would be less than 2 per day in 3A, this would have damaged my business even though we were under the GHL.

We should not be changing the GHL (i.e. Allocations) at all and especially at low abundance levels. The CSP numbers should not be less than the GHL for any condition. We are already stairstepped with abundance under the GHL. Since the GHL is already legally affirmed anything less will have to be a legally justified reallocation of the resource.

Any damage done to the resource is by the commercial side who catches almost 90% of all Halibut removals, benefits from overly high removal rates (in the 10s of millions of dollars). Remember the GHL limits us to 4.0 mil lbs max. in 3A, no matter what the CEY is. You then expect us to take less than the GHL at low abundance levels with no benefits or even crediting us for years of not using our full allocation.

Frank Casey
Alaska Wildrose Charters
Po box 343
Clam Gulch, AK. 99568
907-252-4525

RECEIVED
MAR 20 2012

Dan Kowalski
11681 Kallgren Rd. NE
Bainbridge Island, WA 98110
P.O. Box 477
Petersburg, Alaska 99833
T 206 842.1890

March 20, 2012

Eric Olson, Council Chair
North Pacific Management Council
npfmc.comments@noaa.gov

Dear Mr. Olson,

Thank you for the opportunity to comment on the Halibut Catch Sharing Plan (CSP). My family runs a combination vessel out of Petersburg, Alaska, and we have been fishing halibut commercially since 1982. It is a mainstay of how we stay alive financially, and we are committed to helping the fishery continue to be viable and sustainable for all user groups.

We strongly support the CSP allocations that were established in 2008 through a fair and objective process. The CSP links both the commercial and sport/charter sectors to management's overall index of abundance, helping to prevent a situation where the commercial sector bears the brunt of downturns in halibut.

Further, the CSP provides a means to transfer quota share between sectors. This is how it should be. The CSP should not be diminished in favor of the CATCH program.

Finally, the impact of yearly quota decreases has been extremely difficult (devastating) to our family's fishing operation. Our quota was paid for, but the roughly 65% decrease in the last five years has necessitated investing in salmon permits and gear just to stay in business.

The halibut fishery must be managed fairly and in such a way that it doesn't put the commercial sector out of business.

Sincerely yours,

Dan Kowalski

Subject: CSP
From: steve vanek <smlvanek@gmail.com>
Date: 3/20/2012 10:19 AM
To: npfmc.comments@noaa.gov, halibutcoalition@gmail.com

I've been fishing halibut commercially for 45 years. I have seen halibut stocks fluctuate and don't mind conservation quota reductions. However, all users must share in conservation. There were basically no charter operators in Cook Inlet when I started fishing. Now I must share with the charter sector when they don't share in the conservation. It took years to get a moratorium on their numbers. I strongly support the catch-sharing plan as it was initially proposed. Do not change it.
Steve Vanek

CSP comment

Subject: CSP comment
From: Otto <flrschtz@aptalaska.net>
Date: 3/20/2012 9:14 AM
To: <npfmc.comments@noaa.gov>

Otto Florschutz

F/V Nephi

Wrangell, AK

After exploiting the Halibut resource for over a decade the charter industries answer to a low biomass is to change the allocation and give them more fish. What have they done to earn more. They have opposed every management option ever proposed. It would be grossly unfair to support this or allow it to happen. Ironically they could themselves alter the allocation by supporting individual quota sharing and purchasing IFQ from fishermen but they have also opposed this plan. I urge you to pass the current CSP and put this argument behind us.

Myself like many others are heavily dependent on our halibut fishery. We have supported quota reductions in the past to rebuild stocks, now those conservation measurements are in jeopardy, for by altering the CSP, when the stocks rebuild the charter industry will take the increase away from the commercial sector. This option should not be on the table. I again urge you to pass the CSP without revision.

Catch sharing plan

Subject: Catch sharing plan

From: Patricia Phillips <pelicandragonfly@yahoo.com>

Date: 3/20/2012 5:44 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

CC: Halibut Coalition <halibutcoalition@gmail.com>

To: Chairman Eric Olson

This letter is in support of the Halibut Coalition's stance on the Catch Sharing Plan. My husband, James Phillips and I, live in Pelican, AK. We base our commercial fishing operation (primarily longline halibut and sablefish) out of Pelican for 33 years, running our own operation since 1979. We have seen the fluctuations in allocations and seen the inundation of the halibut fishery by new entrants in the sport fish charter industry. Over the years we have hired crew members from our community and many of them now own their own commercial fishing operations. It is encouraging to see young people investing in commercial fishing boats and permits. The halibut fishery should be managed to encourage their stake in the fishery. This requires loans based on forecasting positive returns in the foreseeable future. CFAB supports loans to fishermen only when projected earnings can be shown to payoff the loan. We need to give our young people and other fishermen a fighting chance at investing in a fishery that has long-standing as a way of life and helped to build many of the communities we live in - especially fishing towns like mine, Pelican. There are at least ten young fishermen who grew up in Pelican, now with their own fishing operations. They depend on a viable resource for their livelihood. Please support the following key points highlighted by the Halibut Coalition:

1. The CSP allocations were set in 2008 to provide a measure of stability to the halibut industry. The CSP allocations SHOULD NOT BE CHANGED.
2. The CSP fairly ties both sectors to the same index of halibut abundance and ensures both sectors share in resource conservation. This GHL disproportionately burdens the commercial fleet with conservation reductions during times of low abundance.
3. The CSP provides a mechanism for QS transfer between individual commercial and charter fishermen. I support this component of the CSP. If and when the CATCH program becomes a feasible option, it could be incorporated into the halibut charter management plan. The CSP should not be held hostage to the CATCH program.
4. document the economic effect of the quota reductions on YOUR businesses and ability to make payments on the QS. [The supplemental analysis is weak on this point]

Thank you for serving on the NPFMC and for your attention to my concerns.

Patricia Phillips

PO box 109

Pelican, AK 99832

Sent from my iPad

Subject: CSP For Halibut
From: Matthew Metcalf <mmetcalf6003@charter.net>
Date: 3/20/2012 7:49 AM
To: npfmc.comments@noaa.gov

Dear Chairman Olson,

I am writing today to encourage you and the Council to proceed with implementation of the Halibut catch sharing plan as soon as possible. The plan should be implemented as it was approved by a 10-1 vote in 2008 with the original allocations between Commercial and sport users. The plan as originally passed provides access to sport users, stability for the commercial fishermen, processors and markets that ultimately use the halibut. The simple beauty of the plan is that it ties the two major users (commercial and charter operators) to the health of the resource and gives them both a vested interest in protecting that resource. Right now the commercial fleet bears the majority of the burden of conservation which is unfair to the fishermen, processors, and communities that rely on the Halibut fishery. The CSP should be implemented as soon as possible with the transfer mechanism that was originally proposed and not face any more delays by the charter fleet and the "CATCH" program. They have had 16 years to come up with an alternative plan and it is too late to propose a new program that would delay the whole process while they work out "minor" details like funding. Thank you for considering my comments.

Sincerely,

Matthew R. Metcalf
2999 Joshua Court
Holland, MI 49424
(616) 283-6003

north pacific council meeting

Subject: north pacific council meeting
From: Diane Svymbersky <pacsun.svymbersky@gmail.com>
Date: 3/18/2012 1:37 PM
To: npfmc.comments@noaa.gov

joe svymbersky-owner/operator pacific sun charters. council members, i would like to go on record,that the council must get rid of this csp (catch sharing plan nonsense and throw it out for good! the 3a charter fleet has been operating under the current ghl for years and has only gone over it once (barely). also if the fish and game logbook data is used over the saltwater harvest survey, the charter fleets allocation will need to be adjusted accordingly (lets try to be at least a little fair).on a final note, lets try to get a grip on the trawler bycatch of halibut and salmon.what a waste of a precious and valuable resource. thank you ,

Subject: NPFMC 26Mar-3Apr2012 Mtg: Halibut CSP (C4b)
From: "Ken Larson" <l Larson_ken@hotmail.com>
Date: 3/20/2012 2:33 PM
To: <npfmc.comments@noaa.gov>

Dear Chairman Olson and Members of the Council:

Since 1991, I have been a small lodge and charter operator out of Valdez and Ellamar, Alaska. I heartily concur that there needs to be a lot more dialog and input into determining a CSP unified position that has ANY hope of affecting a pro halibut sport fish position on any action before our COMFish-dominated boards and councils, which, as I've said before, is like herding cats. Several of us have put in a lot of time and money to try to help solve the halibut issues for the last 20 years, but a whole lot more have done little or nothing. Taking cuts in our GHL's, only to have the fish re-allocated to the COMFish sector's "less-reduced" Catch Limits and Bycatch & Wastage does nothing for conservation. It kinda puts us in the same quandary as what do you do when you see an endangered animal eating an endangered plant....? And don't forget in Area 3A, we have been substantially under our GHL for the last several years, which has acted as a defacto reallocation to COMFish already!

With regards to GAF and leasing fish from COMFish IFQ holders, that is certainly a non-player for most of us who don't already own some IFQ. I've asked several of my clients over the last 3 years what they would be willing to pay for a 2nd fish if we were forced to a one fish limit in Area 3A and could lease IFQ. To a person, they said they would have to stop fishing for halibut as it's already on the upper cost limit of their recreational pursuits. So, with GAF, if you try to fail, and succeed, which have you done? So for the above reasons, the CSP as currently contemplated is unsupportable by most of us in the charter industry. COMFish should be equally concerned because their over-fishing practices have certainly contributed to the current state of the fishery!

On the possibility of a zero fish moratorium (ZFM) in 2014, I am only trying to be a realist. I attended the December 2011 NPFMC meeting and IPHC's January 2012 meeting and listened and spoke with a lot of folks smarter than me about the declining Halibut E-Biomass. The scientists have a lot of unproven theories, retrograde mis-estimations and conjecture to point at as possible causes of the decline. Yet, in most charter fishing areas, we have seen an obvious decline in numbers of catchable O32" halibut with a very real proliferation of U32" chickens and turkeys! IPHC's biologists won't admit it officially but they would have liked to have seen a 2012 COMFish Catch Limit set a lot lower than the 33 Mlbs forwarded for approval by Depts of Commerce & State. It was real obvious that there was way too much COMFish influence being exerted to keep higher COMFish Catch Limits and ByCatch and Wastage allowances for Trawlers. My understanding of what the biologists are saying is that IF we don't see at least a slowing, if not a positive upturn in the E-Biomass in 2012 or 2013, then drastic cuts, including a ZFM have to be considered and/or implemented. If a one-fish, 37" maximum size limit can be forced on Area 2C in one year, don't think a ZFM can't be forced on at least the sport fishermen and hopefully the fallout would stop COMFish also. I appreciate your efforts on trying to resolve a difficult issue. Thank You,

Ken L Larson, SANITY CHARTERS, 1074 Eliz Street, North Pole, AK 99705, 20 March 2012

Subject: comments, Catch Sharing Plan
From: "sigurd rutter" <fv_nuts@mail.com>
Date: 3/20/2012 2:43 PM
To: npfmc.comments@noaa.gov

To: NPMC: I am a comm. halibut fisherman of some 30 yr, here in Sitka. I urge the council to maintain the allocation between sport/commercial at its' present level. As the overall quota shrinks, charter interests are simply demanding a greater share of the remaining quota of halibut. This is a greaty travest, and will wreck havoc on coastal economies throughout Alaska. The only equitable solution to fairly address constraints placed upon both competing commercial interests is to maintain the allocation, and impose some kind of fleet reduction measures, upon the guided sector. Commercial fishers should not be economically harmed to accomodate the exponential growth of the guided sector brought on by the failure of the council to address allocation issuesfairly for almost 20 yr., due to the radical politicalization of the council process that began under Gov. Tony Knowles. The appointment of charter guides, businesses catering to them, and their sympathizers has significantly degraded the integrity of the council process. This travest continues with the appointments submitted recently by Gov. Sean Parnell. It's high time the council fairly address halibut allocation issues, quit the cheap political decisions, and do what is right for the people who depend on the halibut resource. Charter outfitters continue to market unrealistic expectations. Because, for the most part, the fish just aren't there anymore. Guides had their chance to participate in an IFQ plan, and they turned it down. There is no reason, now, to tweak the system in their favor, by allowing them to buy up all the remaining halibut quota. Charters were awarded guideline harvest levels well above their historic level of harvest. They made their bed, in a political sense, and, now they can damned well sleep in it. Sigurd Rutter, Sitka, AK

CSP comments

Subject: CSP comments

From: Marty Remund <remundmarty@yahoo.com>

Date: 3/20/2012 3:17 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

CC: "alfastaff@gmail.com" <alfastaff@gmail.com>

NPFMC Council Chair Eric Olson, I'm Marty Remund, I've longlined for halibut in 2C since 1975. I've sent in countless comments, and testified twice in Anchorage over the last 18 years on this allocation issue! Very frustrating... The CSP allocation split was set in 2008 to help stabilize the commercial/charter fisheries and SHOULD NOT BE CHANGED. The CSP allows both sectors to share the pain, share the gain, as halibut abundance fluctuates. This GHL disproportionately burdens the commercial fleet with conservation reductions during times of low abundance. The CSP allows for a mechanism for QS transfer between sectors, which I support. If the CATCH program becomes feasible it can be incorporated into the halibut charter management program. The CSP should not be held hostage to the CATCH program. Our family fishes together, and we bought 2/3 of our halibut quota. While we support conservation of the halibut stocks, the economics of the 2C quota reductions have been very tough. Six or seven years ago our family's quota was 32,000 lbs, and currently is at 8000 lbs. Sincerely, Marty Remund from Port Alexander and Haines AK.

Halibut allocation

Subject: Halibut allocation

From: Art Bloom <artmbloom@gmail.com>

Date: 3/21/2012 6:17 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

The CSP allocations were set in 2008 to provide a measure of stability to the halibut industry. The CSP allocations SHOULD NOT BE CHANGED.

The CSP fairly ties both sectors to the same index of halibut abundance and ensures both sectors share in resource conservation. This GHF disproportionately burdens the commercial fleet with conservation reductions during times of low abundance.

The CSP provides a mechanism for QS transfer between individual commercial and charter fishermen. I support this component of the CSP. If and when the CATCH program becomes a feasible option, it could be incorporated into the halibut charter management plan. The CSP should not be held hostage to the CATCH program.

QS reductions have already had a significant financial impact on my income and ability to invest in my equipment and quota purchases.

Art Bloom

Bruce A Smith
F/V Noseeum
P O Box 273
Gustavus, AK 99826

March 20, 2012

North Pacific Fisheries Management Council
Eric Olson, Chair

Mr. Olson,

I'm writing today to encourage you to support the Catch Share Plan (CSP) that is presently before you.

I do not think the reverse slot limit is a good idea. I believe it is premature to implement a management tool that will allow guided and un guided fisherman to catch and release halibut all day, hoping to catch the big one over 68 inches. You cannot say with any certainty what the mortality rate of this will be.

Please study the mortality rate of this catch and release practice, before you allow the pressures of the sport charter industry to set regulatory measures. Decide instead, to support conservation of the stocks, and the future of all halibut fishing.

Sincerely,

Bruce Smith

Colleen Stansbury
F/V La Bamba del Mar

March 20, 2012

North Pacific Fisheries Management Council
Eric Olson, Chair

Dear Mr. Olson, I have been fishing commercially for halibut since 1976. I am writing today about the Catch Share Plan (CSP), which you and the Council will be discussing in the coming weeks.

I support the CSP as an attempt to manage the burgeoning sport charter industry. I live and fish out of Gustavus, Alaska, which lies along Icy Strait. This area has been particularly impacted by the growing charter and self guided fishing, because Icy Strait and neighboring Glacier Bay consistently host larger halibut and lower rod hours than any where else in Alaska. This makes these waters a magnet for trophy fishers and should be managed with this in mind.

I am deeply concerned about the use of a reverse slot limit as a regulatory tool along with the CSP. The North Pacific Fisheries Management Council members are charged with protecting the resource, halibut in this case, and conservation should be your primary guiding principle. The reverse slot limit is not well supported by council members, and for good reason. It has no foundation in this application, no basis in the research and there is not one piece of evidence involving mortality that indicates a reverse slot limit can be safely (for the fish), employed. I believe it is irresponsible to recommend a regulatory method, without first attempting to show that it will not further damage the resource. The reverse slot limit will encourage and sanction serial catch and release fishing, in an effort to catch the "big" one. No one knows what the mortality rate of this kind of catch and release will produce, and until you have some idea, reverse slot limit will remain extremely risky.

Please don't gamble with my livelihood and the future of the halibut stocks. Please demand conservation, based on available science and historical data, not economic politics. You are responsible for the future of the Pacific halibut stocks. Support the CSP without the reverse slot limit, until catch and release mortality data is available.

Thank you for your time and consideration of this matter,

Colleen Stansbury
P O Box 145
Gustavus, AK 99826
codlips@gmail.com

Re: Halibut issues at the March-April 2012 meeting

Subject: Re: Halibut issues at the March-April 2012 meeting
From: Paul Barnes <haikuaikido@gmail.com>
Date: 3/20/2012 10:12 PM
To: npfmc.comments@noaa.gov

Eric A. Olson, Chairman
North Pacific Fishery Management Council
Anchorage, Alaska

Re: Halibut issues at the March-April 2012 meeting

Dear Mr. Olson,

Please investigate reverse slot limits for the charter fishery because of the likelihood that they result in increased release mortality.

Please don't base reverse slot limit on a business model! Base it on the resource. Where is the science, the biological basis behind reversed slot limit? How is reverse slot limit helping the resource come back? It seems to be based a business model and again, not on the resource. It's only going to encourage high-grading large female fish.

Enforcement is another key issue. Commercial fisherman are penalized as an individual (not as an entire user group!) when we go over one pound! It's only fair, the charter fleet must also be held personally accountable for their individual overages as well.

Finally, the Council must get serious about doing things to reverse the leakage from the charter fishery into "self-guided" operations. It's happening. We've watched it with our own eyes last year. The charter fleet is smart and are asking troopers questions to take advantage of every legal loop hole.

Sincerely,
Paul Barnes

PO Box 155
Gustavus, AK 99826
907-697-2427

Halibut issues at the March-April 2012 meeting

Subject: Halibut issues at the March-April 2012 meeting
From: melissa <melsamoon@gmail.com>
Date: 3/20/2012 10:06 PM
To: npfmc.comments@noaa.gov

Eric A. Olson, Chairman
North Pacific Fishery Management Council
Anchorage, Alaska

Re: Halibut issues at the March-April 2012 meeting

Dear Mr. Olson,

Please investigate reverse slot limits for the charter fishery because of the likelihood that they result in increased release mortality.

Please don't base reverse slot limit on a business model! Base it on the resource. Where is the science, the biological basis behind reversed slot limit? How is reverse slot limit helping the resource come back? It seems to be based a business model and again, not on the resource. It's only going to encourage high-grading large female fish.

Enforcement is another key issue. Commercial fisherman are penalized as an individual (not as an entire user group!) when we go over one pound! It's only fair, the charter fleet must also be held personally accountable for their individual overages as well.

Finally, the Council must get serious about doing things to reverse the leakage from the charter fishery into "self-guided" operations. It's happening. We've watched it with our own eyes last year. The charter fleet is smart and are asking troopers questions to take advantage of every legal loop hole.

Sincerely,
Melissa Senac

PO Box 155
Gustavus, AK 99826
907-697-2427

Re: Halibut issues at the March-April 2012 meeting

Subject: Re: Halibut issues at the March-April 2012 meeting
From: melissa <melsamoon@gmail.com>
Date: 3/20/2012 10:04 PM
To: npfmc.comments@noaa.gov

Eric A. Olson, Chairman
North Pacific Fishery Management Council
Anchorage, Alaska

Re: Halibut issues at the March-April 2012 meeting

Dear Mr. Olson,

Please investigate reverse slot limits for the charter fishery because of the likelihood that they result in increased release mortality.

Please don't base reverse slot limit on a business model! Base it on the resource. Where is the science, the biological basis behind reversed slot limit? How is reverse slot limit helping the resource come back? It seems to be based a business model and again, not on the resource. It's only going to encourage high-grading large female fish.

Enforcement is another key issue. Commercial fisherman are penalized as an individual (not as an entire user group!) when we go over one pound! It's only fair, the charter fleet must also be held personally accountable for their individual overages as well.

Finally, the Council must get serious about doing things to reverse the leakage from the charter fishery into "self-guided" operations. It's happening. We've watched it with our own eyes last year. The charter fleet is smart and are asking troopers questions to take advantage of every legal loop hole.

Sincerely,
Vince Schafer

PO Box 172
Gustavus, AK 99826
907-697-2292

Halibut Catch Sharing Plan

Subject: Halibut Catch Sharing Plan
From: George Malcolm Milne <milnmarine@yahoo.com>
Date: 3/20/2012 8:54 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear North Pacific Fisheries Management Council Members,

My name is Malcolm Milne. I live in Homer, Alaska and I have been fishing for halibut since 1994. I fished the very last halibut derby as a deckhand so while some people refer to the derby days I just say back in the derby day. I witnessed the implementation of IFQ's and with no catch history, after feeling I had been left out of the system, I realized that I needed to buy into the fishery which was becoming my career. Over many years I dedicated part of my income to building up my own quota, a little block at a time. I fished my quota on other people's boats where I also worked as a deckhand. Two years ago I bought my own boat and a large part of the business plan that allowed me to do that included fishing my quota. The recent cuts by the IPHC are painful but part of the risks I accepted in buying Halibut IFQ's and owning my own boat. The thing that is not acceptable is the uncontrolled growth of the Commercial Charter Sector. Please stick with your commitment to the catch share plan as written. A lot of work has gone into this plan and it ties both sectors to abundance and allows us all to operate our businesses on what we have expected. All the informed players know the realities of the situation. I beg that you not leave the management up to IPHC recommendations.

I've seen the reams of information you have to read as a Council Member and I appreciate your time in reading my comments. I am also grateful for the time and effort you all put in making the decisions that manage our fisheries. I would be at the meeting myself but I will be on the water, fishing, earning my living, and trying to pay for my IFQ's.

Thank You,

George Malcolm Milne
PO Box 1846
Homer, AK 99603
907 399 6296

Halibut CSP

Subject: Halibut CSP
From: Melvin Grove <mbgrove@mtaonline.net>
Date: 3/20/2012 7:26 PM
To: npfmc.comments@noaa.gov
CC: KenHotMail Larson <larson_ken@hotmail.com>

Chairman Olsen and members of the Council,

The members of the Prince William Sound Charter Boat Association are opposed to the CSP and believe we should remain under the GHF. We also oppose the GAF and want to see the development of a Pool program that will allow the guided sector to purchase IFQs and remain at a two fish limit. Valdez lost over 300 charter angler days as a result of the CHP during the months of June and July costing over \$100,000 in lost direct sales alone in tourism dollars. Lost angler days through the remaining season have yet to be calculated but it's sure to be even greater. Any move to reduce the reasonable opportunity to harvest two fish for guided anglers in Valdez will surely mean the death to the guided halibut charter fleet in Valdez.

Melvin Grove
President PWSCBA
POB 520575
Big Lake, AK 99652

Comment for Agenda Item C4(b)

Subject: Comment for Agenda Item C4(b)
From: "Forrest Braden" <truenorthsportfishing@gmail.com>
Date: 3/20/2012 4:53 PM
To: <npfmc.comments@noaa.gov>

Submitted by Forrest Braden, DBA as True North Sport Fishing in Gustavus, AK. 3/20/2012

Comment for Agenda Item C4(b):

When considering negative effects of harvest measures (Table 18, pg. 22 of CSP discussion paper) the One Fish Daily Bag Limit *with* a Size Limit is listed as not having a negative effect for the category "Distributional Economic Effect Falls on a Small Number of Businesses". This is certainly NOT the case in times of low abundance when maximum size restrictions on a one fish daily bag limit are lower. A case in point is the 2011 maximum size limit of 37" which disproportionately affected 2C businesses economically. ADFG Area G, Gustavus & Elfin Cove, as well as Petersburg, took the brunt of the regulation as businesses in these areas had built their model on larger halibut available in those areas. If maximum size limits remain in consideration for the CSP or any other management regime, please do not overlook the extra burden placed on relatively few businesses that have historically relied on large halibut to build their clientele.

Sincerely,

Forrest

Subject: halibut management comments
From: James Mackovjak <lituya@gmail.com>
Date: 3/20/2012 4:08 PM
To: npfmc.comments@noaa.gov

1. The use of reverse slot limits will likely increase release mortality. Quoting ADF&G biologist Scott Meyer's statement in the Analysis of Potential Halibut Accounting and Management Measures: "One concern associated with using reverse slot limits is that it is difficult to measure large fish without removing them from the water."

2. An estimate of release mortality should be counted as part of the total harvest of the charter as well as the sport sector. The estimate of a 10 percent release mortality by ADF&G's Scott Meyer is less than the 16 percent used for the commercial fishery, and it assumes that best release practices and good ethics are practiced by all sport fishermen.

3. The Council must reverse the leakage from the charter fishery into the nominally "self-guided" commercial operations. These operations skirt the daily bag limits and the requirement for charter vessel limited entry permits under which legitimate charter operators conduct their business. The nominally self-guided operations also subvert the intent of allocations and result in questionable harvest data. As the saying goes, "If you can't measure it [or are unwilling to measure it] you can't manage it." The phenomenon is large and rapidly growing in our part of Alaska, and can make it difficult for honest charter fishermen to compete.

--
James Mackovjak
P.O. Box 63
Gustavus, Alaska 99826
home: (907) 697-2246
cell: (541) 514-9145
lituya@gmail.com



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

March 20th, 2012

Chair Olson and Members of the Council:

I appreciate the opportunity to comment on the ongoing development of the Catch Sharing Plan (CSP) and its component parts. I am submitting these comments on behalf of the membership and Board of Directors of SEAGO.

It is clear from the discussion paper and supplementary analysis that Council and agency staffs have committed a significant amount of work to address the numerous issues brought before the Council during the December 2011 meeting. We applaud this work.

As you recall, SEAGO has consistently expressed concern about what the effect of the implementation of the CSP, as written, would mean for the Southeast charter sector. Those concerns remain. However, I will focus my comments here on the Guided Angler Fish (GAF) provision.

As I stated in my written and verbal comments during the December 2011 meeting, it is SEAGO's position that GAF is an unwieldy provision that is not wanted by the charter sector and likely to be unused by operators. Not only will GAF be difficult to administer, but it will create significant confusion among charter anglers.

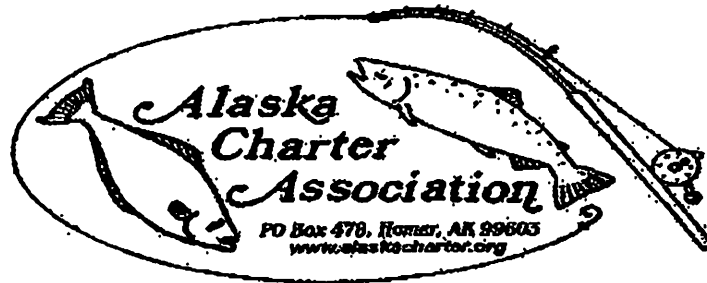
SEAGO concurs that Method 3 discussed in the supplementary analysis (pg. 3) appears to be the most workable accounting method. In acknowledging that, we also point out that agency staff has stated that this methodology would not be a logical outgrowth of the proposed rule.

We do support the general concept of a compensated reallocation mechanism to facilitate transfer of IFQ from the commercial to charter sector and we are currently working to develop a framework for such a mechanism through the Catch Accountability Through Compensated Halibut (CATCH) project. It is our hope to be able to provide the Council with this framework by midyear 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath E. Hilyard".

Heath E. Hilyard, Executive Director
SEAGO



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

March 20, 2012

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK. 99501-2252

RECEIVED
MAR 20 2012

Re: C-4/Halibut Catch Sharing Plan

Dear Mr. Olson,

The Alaska Charter Association (ACA) is one of the largest statewide organizations representing charter fishing interests and associated businesses in Alaska. Its mission is to preserve and protect the fishing rights and resources necessary for the Alaska charter fleet to best serve the recreational fishery. The recreational fishery in Alaska adds over 1.4 billion dollars annually to our state's economy.

The ACA is very concerned about numerous issues contained in the Halibut Catch Sharing Plan (CSP). We have highlighted our concerns in past testimony and letters addressed to this Council and in a detailed letter to Mr. Glenn Merrill of the National Marine Fisheries Service (NMFS), dated September 15, 2011, when the proposed CSP was published in the Federal Register.

A brief summary of the ACA's major concerns with the proposed CSP continues to be:

- 1) The proposed CSP relied on outdated data and assumptions and lacked a comprehensive socio-economic study.
- 2) A CSP allocation should mirror the GHL allocation. The GHL was endorsed by the Secretary of Commerce and re-affirmed by a federal court as "fair and equitable." The proposed CSP is not consistent with Executive Orders 12962 and 13474. Re-allocating fish from the guided recreational sector to the commercial sector, even lacking analysis, will exacerbate leakage issues between the guided and non-guided recreational fisheries.
- 3) A CSP matrix of harvest measures should not include non-discretionary "frameworking." Furthermore, the North Council should not rely on the International Pacific Halibut Commission (IPHC) to make the domestic harvest decisions that are the responsibility of the North Council. The CSP should incorporate a greater range of harvest measures and allow annual bag limits by skipper and crew based on abundance.

- 4) The proposed CSP's Guided Angler Fish (GAF) will increase, rather than reduce conservation concerns based on average size assumptions. A new requirement mandating measuring and immediate identification of GAF would address some concerns. Lease limitations are arbitrary, and very importantly, it conflicts with the established IPHC, state and federal regulations on the "sale" of fish by the recreational sector. The GAF provision should be replaced with a well vetted "Pool Plan" as is being proposed by the CATCH program coordinator.
- 5) If this Council decides to rely on ADF&G charter logbooks to manage the charter sector, an appropriate action needs to be made to bridge the discrepancies between catch data contained in the logbook program as compared to the Statewide Harvest Survey.

Again, the ACA appreciates this opportunity to express our concerns to the Council and appreciates its foresight by creating the Charter Halibut Management Implementation Committee to address and develop solutions. Thank you for your consideration.

Sincerely yours,

p.p. 

Gregory M. Sutter,
President, Alaska Charter Association

Homer Charter Association

P.O. Box 148 Homer, Ak. 99603

President: Gary Ault, Vice president: Donna Bondioli, Secretary treasurer : Gerri Martin
Board members: David Bayes, Phil Warren, Alternates: Scott Glosser, Joe Szymberski

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK. 99501-2252

RECEIVED
MAR 20 2012

Re: C-4/Halibut Catch Sharing Plan

3/19/12

Dear Mr. Olson

The Homer Charter Association (HCA) represents thirty charter companies and associated businesses from the Homer area. Its mission is to preserve and protect the sustainability of fishing rights and resources necessary for the Homer charter fleet to best serve the recreational fishery and our community. The HCA submits the following comments on the proposed Catch Sharing Plan (CSP) for Guided Sport and Commercial Fisheries for Pacific Halibut.

The proposed CSP relied on outdated data and assumptions and lacked a comprehensive socio-economic study.

1. If this Council decides to rely on ADF&G logbooks to manage the charter sector, an appropriate action needs to be made to bridge the discrepancies between catch data contained in the logbook program as compared to the Statewide Harvest Survey. Logbook data indicates that charter harvests in area 3A are 15.6% higher than the SWHS data suggests. Therefore unless an adjustment to the allocation is allowed consistent with this difference in data, the guided angler will get 15.6% less fish. It is a very significant reduction in allocation that will lead to further restrictive measures solely because of the type of record keeping being implemented.
2. Re-allocating fish from the guided recreational sector to the commercial sector will enhance the possibility of blurring the line of distinction between the guided and non-guided recreational fisheries particularly in area 3A.
3. The CSP should incorporate a greater range of harvest measures and allow annual bag limits by skipper and crew based on abundance among other options put forth by the Charter Management Implementation Committee.
4. A CSP allocation should mirror the GHL allocation.

The next concern is the Guided Angler Fish (GAF) leasing program.

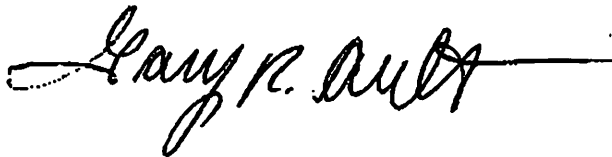
1. The method of record keeping for the GAF is not reliable. The GAF issued in lbs. would result in the smallest fish of the day being the GAF. This will lead to inaccurate estimation of average size of fish and inaccurate harvest estimates.

2. The restrictions on the amount of GAF each permit holder can acquire are overly restrictive especially for permits with more than a six angler endorsement. In area 3A there are dozens permits for up to twenty five anglers and the 600 fish limit is totally inadequate. This restriction will have the effect of cutting some of the larger boats out of half their available season.
3. The limited amount of the IFQ holder's transferable quota. The 1500 lbs. or 10% restriction is going to result in trying to deal with multiple IFQ holders and perhaps an auction type of negotiation process that will lead to the sale to the highest bidder outcome. This could decimate the smaller businesses.
4. It would seem that the GAF program accountability is unreliable, the amounts available are inadequate and the outcome of the program will be to displace the smaller business with larger ones.

In summation, it is the Homer Charter Association's contention that the GHL with the Charter Management Implementation Committee's guidance should be the vehicle for preserving the resource as well as the caring for the needs of the guided angler.

Thank You for this opportunity to comment.

Gary Ault president, Homer Charter Association.



Gustavus, Alaska
March 20, 2012

Eric A. Olson, Chairman
North Pacific Fishery Management Council
Anchorage, Alaska

Re: Halibut issues at the March/April 2012 meeting

Dear Mr. Olson:

Along with many residents of the community of Gustavus, I am concerned about the heavy pressure being put on halibut stocks at a time when they are in serious decline. Rather than advocate for any particular user group, I advocate for careful and conservative management of the several halibut fisheries. Below are some specific points related to the halibut Catch Sharing Plan and related halibut issues.

1. I would like to see the halibut Catch Sharing Plan come into effect soon, and to retain the present charter and commercial allocation percentages in that Plan.
2. I question the use of reverse slot limits for the charter fishery (e.g. for 2012 in Area 2C, 45" and under and above 68") because of the likelihood that they result in increased release mortality. Biologist Scott Meyer, in the Analysis of potential Halibut Accounting and Management Measures, prepared for this Council meeting, stated that "One concern associated with using reverse slot limits is that it is difficult to measure large fish without removing them from the water." This type of regulation should not be used until a thorough field study of release mortality is conducted.

That said, I do recognize that the 37-inch limit for charter-caught halibut in 2C in 2011 was too conservative.

3. An estimate of release mortality in the sport fisheries (charter and private) should be counted as part of the total take of these sectors, just as it is counted for the commercial fishing sector. Release mortality is important because almost as many sport-caught halibut are released as are kept, while currently only those kept are counted.

The estimate of 10% release mortality made by sport bottomfish biologist Scott Meyer is too low. It involved no field studies. And it is less than the 16% used for the commercial fishery. The estimate also assumes that best release practices and good ethics are practiced by all sport fishers, in a situation where the perverse incentives are considerable.

4. The Council needs to get serious about doing things to reverse the leakage from the charter fishery into "self-guided" operations. In Area 2C that allows clients a daily bag limit of two fish, any size. In our region (northern Southeast Alaska,

around Icy Strait, Cross Sound and Glacier Bay) this sector was already large (a 60 client per week lodge in Excursion Inlet plus a smaller lodge of the same kind there. Then last year one of the guided lodges in Elfin Cove shifted to "self-guided" And Eagle Charters in Elfin Cove put out a whole new fleet of boats with "Self-Guided" lettered on the sides. As a result, the amount of charter-caught fish shipped out of Elfin Cove last summer A number of operators who work out of Gustavus in the summer last summer had skiffs that they off-loaded for clients to fish "self-guided" along side their charter boats. Many, many people in Gustavus are complaining about this. And we see huge piles of fish boxes being shipped out of the airport here. It is unlikely that the strict regulations for charters in 2011 did anything to reduce the catch here.

The "self-guided" dodge provides a means of skirting the charter regulations - both the daily bag limits and the charter limited entry permits. It also subverts the intent of allocations. And it results in poor quality data - as the saying goes, "If you can't measure it you can't manage it." With so many operating entirely or partly as "self-guided," it can become difficult for honest charter fishermen to compete. The Catch Sharing Plan and other regulations are of little relevance if this problem is not dealt with.

Thank you for your attention.

Yours truly,

Judy Brakel, Box 94, Gustavus, Alaska 99826 Phone 907-697-2287

3/20/2012

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
Re: C-4/Halibut Catch Sharing Plan

Dear Mr. Olson

I have been in the halibut charter business in Homer for the past 34 years and expect to be in it for a long time to come.

The GHL for 3A charters has worked well since its inception. The charter fleets have stayed within its parameters all but 3 years and two of those years were inconsequential. The charter effort has been reduced this past year due to the implementation of the limited entry permit program. The initial GHL was forced on the charter fleet and now that program will be changed for the CSP that reduces the charter allocation while increasing the commercial allocation. If the CSP needs to be implemented it should align with the GHL.

I am concerned that the GHL could be based on logbook data. We have always insisted that logbook data be used for making allocation decisions. We were ignored and the Council used Statewide Harvest Survey (SWHS) data when setting the GHL amounts. Now the Council wants to use logbook data to set up the CSP. The logbook data shows that charter harvests in 3A are 15% higher than the SWHS data. All along we have been told by ADF&G that the SWHS data is equally as accurate as the logbook data. If the logbook data is to be used then the initial GHL amount should be adjusted upwards by 15% or by the difference between the logbook data and the SWHS data. If that is not done then the guided angler (the public) will get X% less fish. This will unfairly and immediately lead to restrictive measures under the CSP.

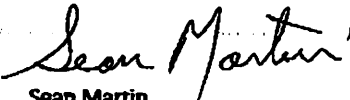
There is a serious inequity between GAF for six angler endorsement boats and those with more than six angler endorsements. I understand that the GAF was never intended to replace all of the fish lost if we need to go to a 1 fish limit. However six angler endorsement boats have a greater advantage because they are allowed 400 GAF and more than six angler endorsements are only allowed 600 GAF. I take an average of 14 passengers per day on my vessel the IRISH for about a 120 day season. That would indicate my vessel will require 900+ GAF to be competitive with boats with six angler endorsements. I have owned the IRISH for 24 years and have been able to maintain that average of 14 passengers per day since. I have had groups as large as 21 fish at a time. There are 17 boats in Homer alone that have greater than 6 angler endorsements. The GAF availability figures must be adjusted to create a level playing field. At the very least the formula used to calculate for 6 angler endorsements should be used for more than six angler endorsement boats.

There should be a provision for charters to own IFQ and use it for GAF then be able to lease to commercials any left over GAF.

The leasing of GAF will be cumbersome and confusing. What GAF may be available will end up going to the highest bidder.

Keep the GHL allocation but upgrade it to reflect the catch amount from the logbook data. If the CSP needs to be implemented it should align with the GHL. Under the CSP upgrade the GAF available for vessels with more than six angler endorsement. Streamline the leasing process so it is easy for both sectors.

Sincerely,



Sean Martin
North Country Charters
Homer, Alaska
907-235-5130

21 March 2012

Council Chair Eric Olson
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

VIA EMAIL: NPFMC.COMMENTS@NOAA.GOV

Dear Council Chair Olson,

Re: Catch Sharing Plan

The notice for comments on Catch Sharing Plan arrived while I was out of town commercial halibut fishing which opened on March 17th, therefore my comments have missed the March 20th deadline.

I support the Catch Sharing Plan. The Halibut Coalition has submitted detailed comments which are inclusive, relevant, and appropriate, and have my support.

All user groups of the Halibut resource should reap the rewards and benefits of this valuable resource. By the same token all user groups must share equally in the conservation of the Halibut resource, and the preservation of the traditional uses by all sectors needs to be maintained within the bounds of Halibut abundance, but with a consistent annual percentage of allocation.

The allocation percentages adopted by the North Pacific Fisheries Management Council in October 2008 are fair and equitable because they protect historical access across the board to all user groups, communities, and individuals.

I've longlined in Area 2C for the past 30 years, and the continuous, annual over-harvesting of the Halibut resource by the charter sector is not only extremely debilitating in the financial consequences to me and my family, but is an unsustainable and negligent way to conserve a valuable resource for all user groups.

All of us need to be held accountable to a healthy Halibut resource, and the Catch Sharing Plan with the opportunity for charter operators to lease Halibut from Individual Fishing Quota holders will be a good step toward this goal.

Sincerely,

/s/

Charles E. "Ed" Wood
P.O. Box 383
Petersburg, AK 99833-0383
907-772-3480

cc: Halibut Coalition
Senator Lisa Murkowski
Senator Mark Begich
Representative Don Young

Sitka Charter Boat Operators Association

PO Box 2422 Sitka Alaska 99835

March 20, 2012

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK. 99501-2252
Re: C-4/Halibut Catch Sharing Plan

Dear Mr. Olson,

The Sitka Charter Boat Operators Association (SCBOA) represents approximately 35 charter operators, working out of Sitka, Alaska. We are pleased to offer our comments on the Halibut Catch Sharing Plan (CSP) currently before the Council.

SCBOA has never been in favor of the Catch Sharing Plan, as it pertains to our industry, because it simply will not work for us. We feel there are many flaws that need to be addressed before this plan can move forward.

Unfortunately, the Council is in its current predicament of using outdated data because a socio-economic study of our industry was never conducted, to give the Council some insight into how our recreational fishing businesses operate.

Having been involved in the establishment of the charter GHL, we are well aware of how the GHL, 13 years later, has become decreed as fair and equitable. The proposed CSP allocation for our industry is somehow less than our GHL, and this is something that needs to be corrected.

The CSP's Guided Angler Fish (GAF) provision will also not work. Sport fish can not be sold and we feel the average size assumptions in the plan need further scrutiny. We encourage the Council to look into the CATCH pool plan currently being developed, as a replacement.

We hope the Council does not rely on the IPHC to make the domestic harvest decisions. Last year's 37 inch ruling for guided anglers only was a financial disaster for Area 2C. We are glad to see the Council taking input from the Charter Halibut Management Implementation Committee, but feel we should remind the Council, that this committee was formed informally and the importance of due process for public comments should not be circumvented.

Thank you for this opportunity to express our concerns to the Council.

Sincerely,



Theresa Weiser
President
Sitka Charter Boat Operators Association (SCBOA)

Agenda C-(4)(b) ERRATA
Table 3 (revised)

IPHC Area	Year	Total CEY	Other Removals	GHL as % of TCEY	Combined Catch Limit	Estimated Harvest	CSP Allocation	CSP as % of TCEY	CSP Matrix Tier	Default Management Measure Under the CSP	Management Measure That Was In Place
Area 2C	2006	13.730	1.864	10.4%	11.866	1.804	1.792	13.1%	3	Two fish (1 < 32")	Two fish any size
	2007	10.800	1.758	13.3%	9.042	1.918	1.365	12.6%	3	Two fish (1 < 32")	Two fish (1 < 32")
	2008	6.500	1.659	14.3%	4.841	1.999	0.837	12.9%	1	One fish with max. size limit	Two fish (1 < 32")
	2009	5.570	1.922	14.1%	3.648	1.249	0.631	11.3%	1	One fish with max. size limit	One fish any size
	2010	5.020	1.842	15.7%	3.178	1.086	0.550	11.0%	1	One fish with max. size limit	One fish any size
	2011	5.390	2.272	14.6%	3.118	0.388*	0.539	10.0%	1	One fish with max. size limit	One fish < 37"
	2012	5.860	1.719	15.9%	4.141				1	One fish with max. size limit	Reverse slot limit (U45O68)
Area 3A	2006	32.180	3.941	11.3%	28.239	3.664	3.953	12.3%	4	Two fish any size	Two fish any size
	2007	35.780	3.920	10.2%	31.860	4.002	4.460	12.5%	4	Two fish any size	Two fish any size
	2008	28.960	3.060	12.6%	25.900	3.378	3.626	12.5%	3	Two fish (1 < 32")	Two fish any size
	2009	28.010	3.520	13.0%	24.490	2.734	3.429	12.2%	3	Two fish (1 < 32")	Two fish any size
	2010	26.190	4.260	13.9%	21.930	2.698	3.070	11.7%	3	Two fish (1 < 32")	Two fish any size
	2011	23.520	5.510	15.5%	18.010	2.837*	2.521	10.7%	2	One fish any size	Two fish any size
	2012	19.780	4.757	15.7%	15.023				2	One fish any size	Two fish any size

Assumes the combined catch limit is equal to the combined fishery CEY, calculated as total CEY minus all other removals except guided sport (no provision for SUFD). Uses the preliminary other removals that were used to set catch limits in these years, not the final estimates of other removals.

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: Area C-46 Halibut CSP

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Kirk Z. Basargin	COMMERCIAL FISHERMAN
2	Robert A. Section
3	John Baker	AFISHUNT Charters/self
4	ANDY McTIBW	SEWARD CHARTER ASSOCIATION
5	Stan Malcom	Petersburg Charter Assoc
6	MR GROVE	PAWS GUARDIAN BOAT ASSN
7	ATTI KOPEC	SELF
8	KEN LARSON	SELF
9	DAVID GOLDSTEIN	SELF
10	RICHARD YAMADA	CATDIT PROJECT
11	GARY AULT	Homer Charter Association
12	REX MURPHY	ALASFA CHARTER ASSC
13	SEAN MARTIN	M/V IRISH
14	Daniel Donich	Daniel's Professional Guide Service
15	Eric Hughes	ANUBAA CHARTERS Seward
16	... (No. 3 above)	A Fish Hunt
17	PETE WEDIN	CAP. Job
18	Geri Martin	North Country Charters
19	Chris Curry	
20	Heath Hilyard	SEAGO
21	Roland Mann	UCIDA
22	JEFF FARVOR	commercial fisherman
23
24	Julianne Curry	Petersburg vessel Owners
25	Linda Behrken	ALFA

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

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-4b Halibut CSP

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Jim Mackowack	SELF
2	Melvin Grove	PWS Charter Boat Assn
3	BRUCE GABRYS	SELF COMMERCIAL FISHER
4	JEFF STEPHAN	UFMA
5	RHONDA HUBBARD	F/V KRUF
6	Tom Gemmell	Halibut Coalition
7	Kathy Hansen	SEAK Fishermen's Alliance
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

HALIBUT ASSOCIATION



OF NORTH AMERICA

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MICHELLE EDDY
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Trident Seafoods Corp.
UniSea, Inc.

OREGON

Pacific Seafood Group

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue Suite 306
Anchorage, AK 99501-2252

Re: Agenda Item C-4, Area 2C/3A Halibut Catch Share Plan (CS)

Dear Chairman Olson:

My name is Peggy Parker. I am the executive director of the Halibut Association of North America. HANA members represent approximately 75% of the halibut processed in Alaska.

We don't own IFQs, but we have been involved with the charter sector management over the last 18 years because we support responsible management. We have endorsed the CSP and its principle of both sectors being tied to the same index of biomass. We've also taken a stand for all sectors to be accountable for their removals, and with the same high degree of certainty. This is especially true now, with the specter of an Armageddon scenario looming.

HANA supports the AP motion recommending the 2012 model to provide more flexibility in management measures to charter operators and adopting the logbooks as the primary data source.

One final note. The charter business is, partly as a result of this process with the Council, evolving to a more sophisticated, organized sector. I am confident they can be held to the same standard in reporting requirements as the other sectors. Maybe not today, but someday soon.

Thank you for your consideration of the AP motion and the separate accountability concept.

Sincerely,

Peggy Parker

STAKEHOLDER RECOMMENDATIONS TO CATCH BOARD

CATCH STAKEHOLDER WORKSHOP, WILD STRAWBERRY LODGE, SITKA, ALASKA, MARCH 12-13, 2012

Holding Entity

- Develop a guided angler Recreational Quota Entity (RQE) that would be able to purchase, hold, sell, and lease commercial halibut quota shares (with the possibility of expanding its role at a later date as approved by an RQE Board of Directors).
- The RQE Board should manage both areas 2C and 3A in separate pools, and should have the authority to decide whether or not to transfer or lend money between the two areas.

Transfer and Purchase

- Transfer of quota shares should be two-way between the commercial industry and charter sector.
- Most, but not all, stakeholders recommend restrictions on the purchase of D class quota share, and all recommend keeping block designations. Everyone agrees that the proposed plan should not recommend any other restrictions such as caps, but should leave it open to discussion.
- The goal of the RQE should be to continue purchasing quota shares until a daily bag limit of two fish of any size is assured, plus a reasonable buffer.
- In the event of excess allocation at the end of a recreational sport season, the excess should first be used as a buffer, and second be leased or “temporarily transferred” to the commercial sector for that year.

Funding

- Initial funding should be sought from all available means (state, federal and private loans) with preference given to a guided angler halibut stamp as a means for loan pay back.

Accountability

- Develop an accurate and timely harvest data reporting system on par with the standards of the commercial IFQ fishery.
- The same accountability measures should be used for all fish, whether from the base allocation or the IFQ pool.
- Most stakeholders (with the exception of one) are in support of measuring fish to improve accountability for the charter sector, with support for logbook and electronic reporting.

Measures for Dealing with Overharvest

- The charter sector should adopt conservative harvest measures to avoid overshooting allocation, with the understanding that if these measures do not keep harvest within allocation, emergency season closures may be applied.



PRESS RELEASE

FOR IMMEDIATE RELEASE

Contact:

Richard Yamada, CATCH Project Director

Richard@catchalaska.org

(907) 723-0008

Date: March 15, 2012

(Sitka, Alaska) On March 12-13, the Catch Accountability Through Compensated Halibut (CATCH) project brought together 18 charter sector stakeholders for a two-day workshop in Sitka. The purpose of the workshop was to share information and gather input and recommendations on the development of a conceptual guided angler pooled catch share plan.

The stakeholder panel included ten representatives from Area 2C and eight representatives from Area 3A, with a good balance of experienced and new perspectives. Jane DiCosimo of the North Pacific Fishery Management Council, and Charlie Swanton, from the Alaska Department of Fish and Game, also attended the workshop to help answer questions regarding some of the technical aspects of the proposed plan.

"We really appreciate the great feedback we received from the participants at the workshop," said Richard Yamada, Director of the CATCH Project. "It is rare that such a diverse group of charter businesses from around the state are able to come to consensus on a single issue. All agreed that this conceptual plan would help recreational anglers, who choose to use their services, maintain their access and opportunity to fish for halibut."

The conceptual plan aims to maintain or increase recreational fishing opportunities for guided anglers in Alaska through the compensated reallocation of halibut quota share from the commercial industry to the charter sector. In concept, a non-profit "Recreational Quota Entity" will purchase quota share from willing commercial IFQ sellers, and hold it in a common pool for the benefit of all guided anglers. The purchased quota will supplement the guided anglers' annual regulatory halibut allocations. The plan is being developed to work under any management regime.

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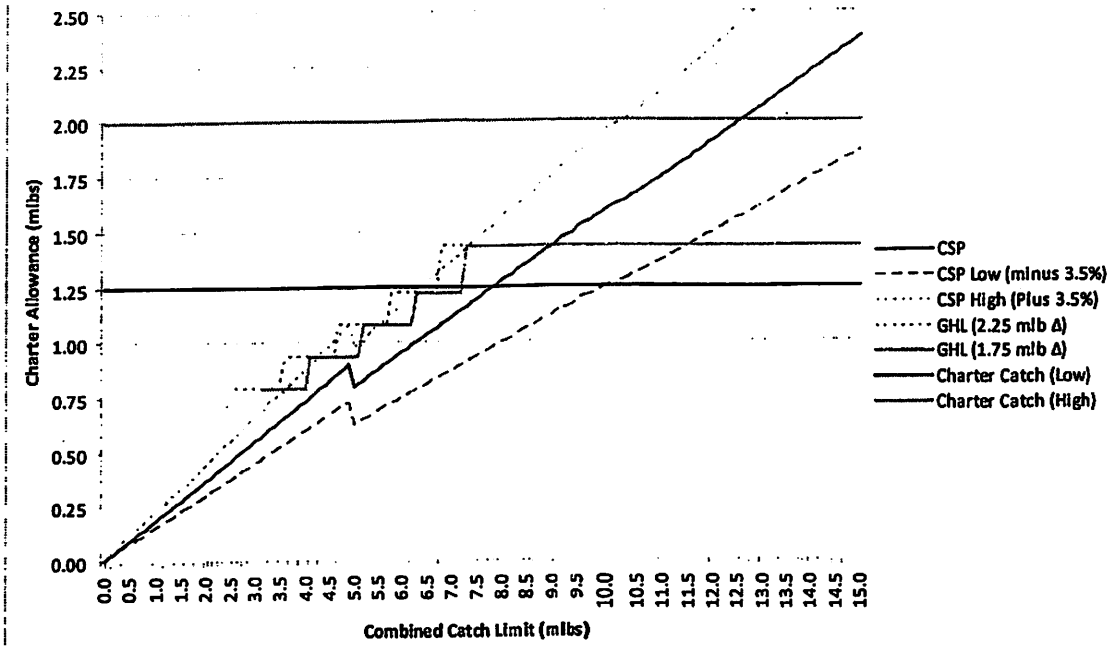
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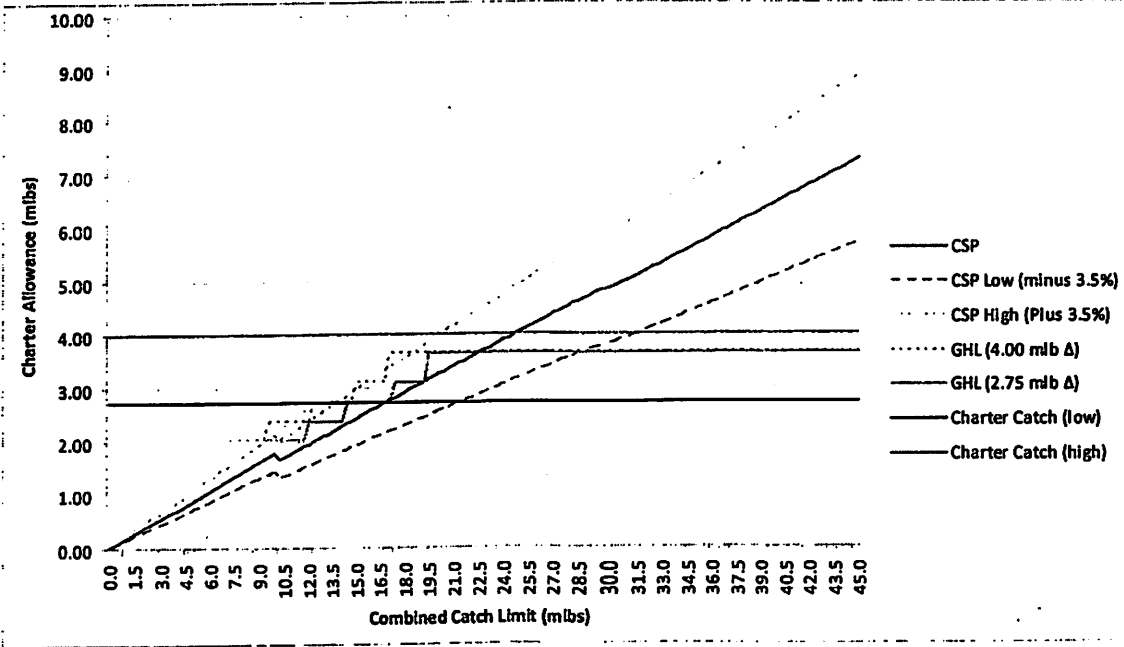
w/ logbook correction factor -
3 yr ave

ALTA
4/10/12

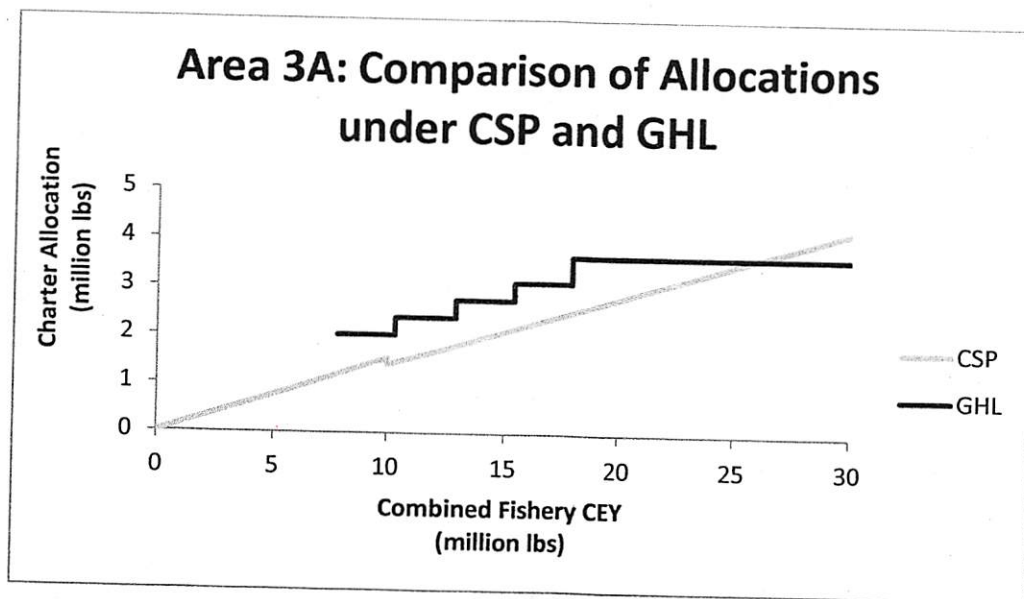
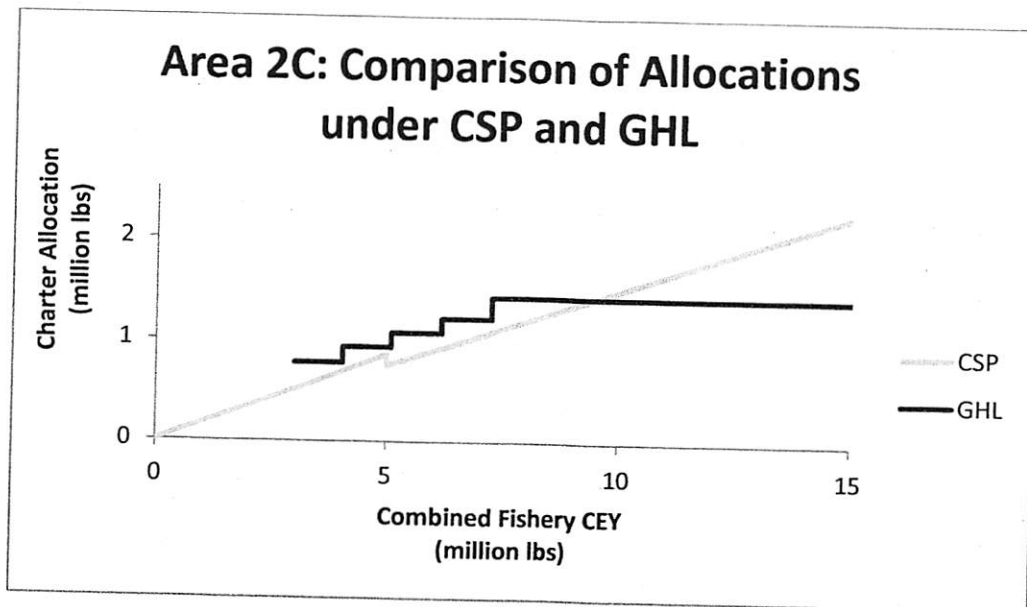
2C



3A



Rex
Murphy



- In both areas, at all but the very highest abundance levels, the CSP allocations are up to 30% less than the GHL.
- With the exception of IPHC's "Slow Up", these allocation decreases represent reallocation to the commercial sector.

Comparing the CSP to the GHL

Area 2C

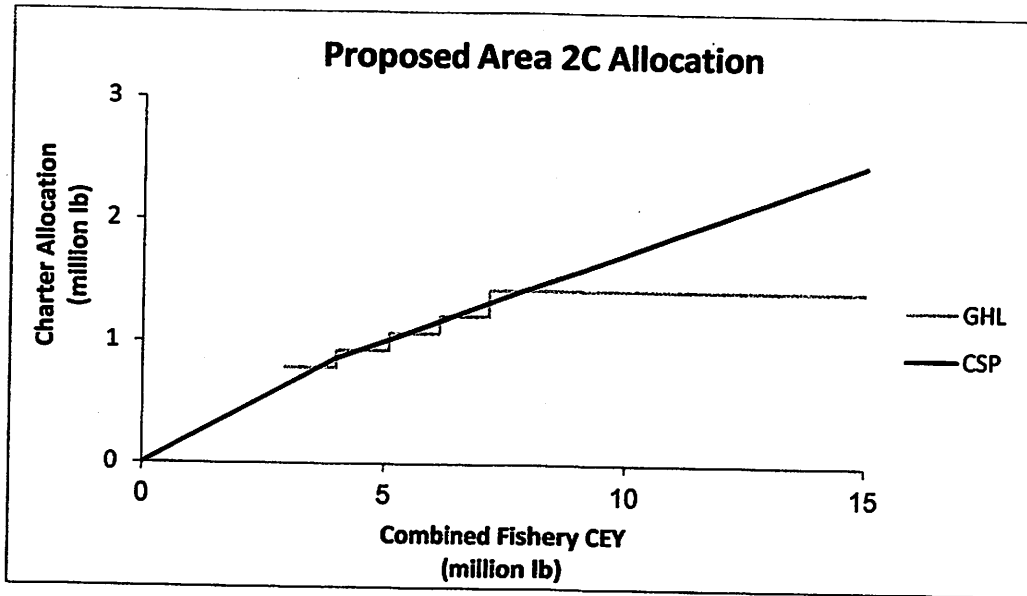
Year	GH L	CSP	CSP vs GH L
2008	0.931	0.837	-10.04%
2009	0.788	0.631	-19.91%
2010	0.788	0.550	-30.23%
2011	0.788	0.539	-31.55%
2012	0.931	0.546	-41.35%

Area 3A

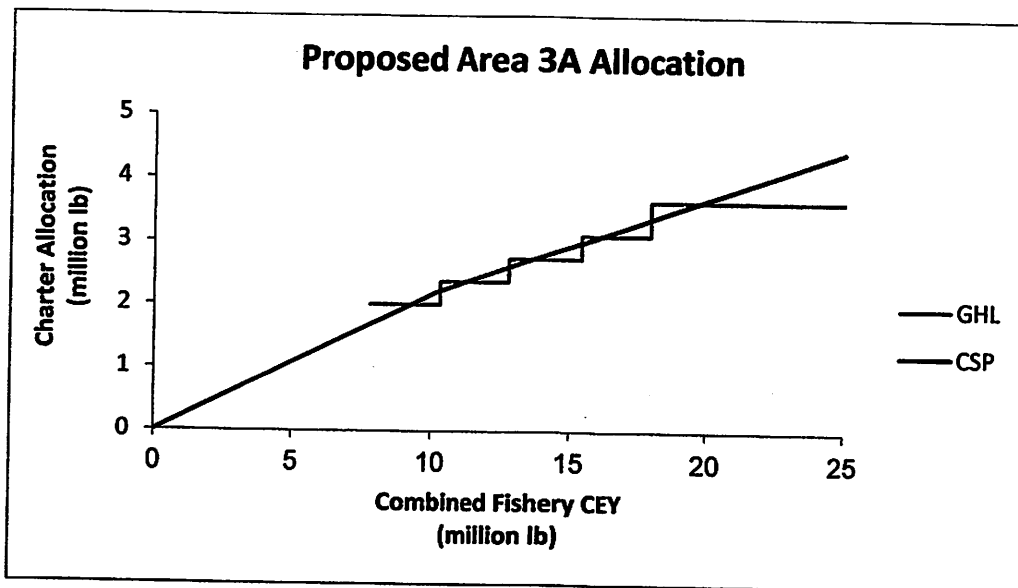
Year	GH L	CSP	CSP vs GH L
2008	3.650	3.626	-0.66%
2009	3.650	3.429	-6.07%
2010	3.650	3.070	-15.88%
2011	3.650	2.521	-30.92%
2012	3.103	2.103	-32.23%

*2012 is a slow up year, meaning combined harvest is managed to last year's combined catch limits plus 1/3 the difference between last year's combined catch limits and this year's combined fishery CEY. Without slow up, CSP allocation would be 0.716 m pounds, 23.05% less than the GH L of 0.931

Ask: Adjust the CSP Allocations to more closely align with the GHL while fully floating with abundance.



2C Allocation: Up to a CCL of 4.0 million pounds: 21.5% of the CCL
 Over a CCL of 4.0 million pounds, 280 k pounds plus 14.5% of the CCL



3A Allocation: Up to a CCL of 10.114 million pounds: 21.6% of CCL
 Over 10.114 million pounds: 658 k plus 15.2% of the CCL



Agenda C-4(b)
March/April
2012

PRESS RELEASE

FOR IMMEDIATE RELEASE

Contact:

Richard Yamada, CATCH Project Director
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(907) 723-0008

Date: March 15, 2012

(Sitka, Alaska) On March 12-13, the Catch Accountability Through Compensated Halibut (CATCH) project brought together 18 charter sector stakeholders for a two-day workshop in Sitka. The purpose of the workshop was to share information and gather input and recommendations on the development of a conceptual guided angler pooled catch share plan.

The stakeholder panel included ten representatives from Area 2C and eight representatives from Area 3A, with a good balance of experienced and new perspectives. Jane DiCosimo of the North Pacific Fishery Management Council, and Charlie Swanton, from the Alaska Department of Fish and Game, also attended the workshop to help answer questions regarding some of the technical aspects of the proposed plan.

"We really appreciate the great feedback we received from the participants at the workshop," said Richard Yamada, Director of the CATCH Project. "It is rare that such a diverse group of charter businesses from around the state are able to come to consensus on a single issue. All agreed that this conceptual plan would help recreational anglers, who choose to use their services, maintain their access and opportunity to fish for halibut."

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Council motion C-4(b)
Charter Halibut Catch Sharing Plan
April 2, 2012

The Council moves to amend its previous action on the charter halibut catch sharing plan (CSP). The following changes (bold/strikeout shows changes from the AP motion) would be incorporated into a new preliminary preferred alternative:

The Council adopts the March 27, 2012, recommendations of the Halibut Charter Management Implementation Committee and the Advisory Panel to adopt the "2012 Model" **for determining annual charter halibut management measures under the CSP and removing the current matrix of management measures that are included in the current proposed rule. With this change, the Council also removes the target range around the allocations of +/- 3.5%.**

The Council also adopts the unanimous recommendation of the Halibut Charter Management Implementation Committee and the Advisory Panel to use ADF&G logbooks as the primary data collection method, ~~with an appropriate adjustment factor applied to the allocations.~~ The AP recommends that the Council work with ADF&G to develop a fair correction factor for switching from the SWHS to the logbook. **The Council recommends using an adjustment factor based on the five-year average (2006 – 2010) of the difference between the harvest estimates provided by the logbooks and the SWHS, with the adjustment factor reduced by the amount of harvest attributed to skipper and crew. The Council's understanding is that applying this adjustment factor would result in the following changes to the CSP allocations:**

Area 3A adjustment factor = 15.4%
Area 3A current CSP allocation in Tier 1 = 15.4%
Adjusted CSP allocation = $(15.4\% * 15.4\%) + 15.4\% = 17.8\%$

Area 3A current CSP allocation in Tiers 2 through 4 = 14.0%
Adjusted CSP allocation = $(14.0\% * 15.4\%) + 14.0\% = 16.2\%$

Area 2C adjustment factor = 5.6%
Area 2C current CSP allocation in Tier 1 = 17.3%
Adjusted CSP allocation = $(17.3\% * 5.6\%) + 17.3\% = 18.3\%$

Area 2C current CSP allocation in Tiers 2 through 4 = 15.1%
Adjusted CSP allocation = $(15.1\% * 5.6\%) + 15.1\% = 15.9\%$

The Council recommends revisions to the GAF program as follows:

- ~~This revision would convert GAF average weight calculated annually by managers and the new average weight used as the conversion factor of IFQ pounds to GAF, issued as numbers of fish.~~
- This revision would issue GAF in numbers of fish. Conversion of IFQ pounds to numbers of fish would be based on the average weight of GAF from the previous year.**
- In the first year of the GAF program, the GAF weight to number of fish conversion factor is based on the previous year's data or most recent year without maximum size limit in effect.
- Define the leasing limitation from one IFQ share holder from 10% or 1500 pounds whichever is greater, to 10% of IFQ holdings or 1500 pounds in 2C, and to 15% or 1500 pounds 3A, **whichever is greater.**

- Include a requirement for anglers to mark GAF by removing the tips of the upper and lower lobes of the tail and report the length of retained GAF halibut to NMFS through the NMFS approved electronic reporting system.
- A complete review within three years of the start of the GAF program, taking into account the economic effects of both sectors.

The Council further initiates an analysis on the ability to purchase IFQ/GAF as soon as possible without delaying implementation of the CSP.

The Council recommends sending a letter to the IPHC supporting the idea of separate BAWM accountability between halibut sectors, and revising the preamble to the rule describing the method that the Council would expect to be used by the IPHC in setting catch limits.

The Council requests that the analysis be revised to incorporate the changes to the preliminary preferred alternative described above, and include analysis of the following options for consideration to revise the charter allocations at lower levels of abundance:

Option 1: Area 2C

At a combined catch limit of <5 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (20.8%); at a combined catch limit of ≥ 5 - <9 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (18.6%).

At combined catch limits of ≥ 9 mlbs, maintain the original target CSP allocation of 15.1%.

Option 2: Area 3A

At a combined catch limit of <10 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (18.9%); at a combined catch limit of ≥ 10 - <20 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (17.5%).

At combined catch limits of ≥ 20 mlbs, maintain the original target CSP allocation of 14.0%.

Note: Under the 2012 model, the +/- 3.5% range around the allocation would be removed, and the Council would be annually recommending management measures that minimize the difference between the projected harvest and the target allocation, without exceeding the allocation.

With the above additions and revisions, the intent of the Council is to review the CSP analysis as a whole and take final action in the near future.

Hull amend