


MEMORANDUM

TO: Council, AP, and SSC Members

FROM: Chris Oliver 
Executive Director

ESTIMATED TIME
4 HOURS

DATE: September 29, 2004

SUBJECT: Subsistence Halibut

ACTION REQUIRED

- (a) Receive report on ADF&G subsistence halibut survey for 2003
- (b) Initial review of analysis for subsistence halibut regulatory amendments

BACKGROUND

Subsistence Harvests of Pacific Halibut in Alaska, 2003 Public Review Draft

Dr. Jim Fall, ADF&G Subsistence Division staff, will present a summary of the first direct survey of the subsistence halibut fishery. A summary of the results is under Item (C-7)(a). The report was distribute last week. It was the source document for the analysis described under Agenda (C-7)(b).

Subsistence Halibut III

In October 2003, the Council initiated six proposed amendments to regulations implementing the subsistence fishery for Pacific halibut in and off Alaska. These regulatory amendments consist of an action that was bifurcated from an April 2002 preferred alternative, together with new proposals that the Council adopted for analysis in October 2003. Action 1 would revise subsistence gear and harvest limits and add a community harvest permit program in Kodiak, Prince William Sound, Cook Inlet, and revise subsistence gear and harvest limits in the Sitka Sound local area management plan. Action 2 would add Port Tongass Village and Naukati to the list of eligible subsistence halibut communities. Action 3 would implement a possession limit equal to two daily bag limits. Action 4 would either eliminate a prohibition on the use of charter vessels for hire or revise the regulatory language to identify immediate family members who may also harvest subsistence halibut when a charter vessel is being used in the same capacity by an eligible owner/operator. Action 5 would revise the regulations to either eliminate cash trade for subsistence halibut or lower it from \$400 to \$100. Action 6 would allow the use of special permits in non-subsistence use areas by tribes whose traditional fishing grounds are located within areas designated as non-subsistence use areas. The analysis was distributed last week. The actions and alternatives under consideration are listed under Item (C-7)(b).

The Council's action is to review the draft analysis and to decide whether to release it for public review. Final action is scheduled for December 2004. It is unlikely that the proposed changes could be implemented for the start of the 2005 fishing year.

SUBSISTENCE HARVESTS OF PACIFIC HALIBUT IN ALASKA, 2003

by

James A. Fall, Madel Kerlin, Bridget Easley, and Robert J. Walker

This report presents findings of a study designed to estimate the subsistence harvest of Pacific halibut (*Hippoglossus stenolepis*) in Alaska in 2003. The Division of Subsistence of the Alaska Department of Fish and Game conducted the study under contract to the National Marine Fisheries Service (NMFS). In May 2003, NMFS published final federal regulations implementing a subsistence halibut fishery in Alaska for qualified individuals who are residents of 117 rural communities or members of 123 Alaska Native tribes with traditional uses of halibut. Subsistence fishers are required to obtain a subsistence halibut registration certificate (SHARC) from NMFS before fishing. A one-page survey form was mailed to 11,635 SHARC holders in early 2004, with two follow-up mailings. Household visits supplemented the mailings in selected communities. In total, 7,593 surveys were returned, a sampling rate of 65.3 percent. Participation in the survey was voluntary.

According to the study findings, an estimated 4,935 individuals subsistence fished for halibut in 2003. The estimated subsistence halibut harvest was 43,841 fish for 1,039,808 pounds (+/- 3.9 percent) net weight. ("Net weight" is 75 percent of "round" or live weight.) Of this total, 751,659 pounds (72.3 percent) were harvested with setline (fixed) gear (longlines or skates) and 288,153 pounds (27.7 percent) were harvested with hand-operated gear (rod and reel or handline). Of those subsistence fishers using setline gear, the most (43.4 percent) usually fished with 30 hooks, the maximum number allowed by regulation. Subsistence fishers also harvested an estimated 14,855 rockfish (*Sebastes* spp) and 3,299 lingcod (*Ophiodon elongatus*) in 2003 while fishing for halibut.

The largest subsistence halibut harvest in 2003 occurred in Halibut Regulatory Area 2C (southeast Alaska), 627,476 pounds net weight, for 60.3 percent of the statewide total. Harvests for the other regulatory areas, in descending order, were as follows: Area 3A (southcentral Alaska), 278,745 pounds (26.8 percent); Area 4E (east Bering Sea coast), 54,267 pounds (5.2 percent); Area 3B (Alaska Peninsula), 27,979 pounds (2.7 percent); Area 4C (Pribilof Islands), 23,768 pounds (2.3 percent); Area 4A (east Aleutian Islands), 20,717 pounds (2.0 percent); Area 4D (central Bering Sea), 4,385 pounds (0.4 percent); and Area 4B (western Aleutian Islands), 2,471 pounds (0.2 percent).

Preliminary data from the International Pacific Halibut Commission indicate that 82.482 million pounds (net weight) of halibut were removed from Alaskan waters in 2003. Of this total, the subsistence harvest accounted for 1.3 percent. Commercial harvests took 73.5 percent of the halibut, followed by by-catch in other commercial fisheries (13.9 percent), sport harvests (9.3 percent), and wastage in the commercial fishery (2.0 percent).

This was the first study to estimate the subsistence halibut harvest in Alaska for a single year. Also, 2003 was the first year for the new subsistence halibut regulations. Therefore, it is not possible to compare the statewide harvest estimate for 2003 with estimates developed with similar methods and under similar conditions for previous years. However, the estimate of about one million pounds of halibut harvested in the Alaska subsistence fishery is consistent with projected harvests based on comparisons with earlier community harvest studies conducted by the Division of Subsistence. The report concludes that the study provided a reliable estimate of subsistence harvests of halibut in Alaska for 2003. It recommends that the research be continued for at least two more years in order to develop a time series for assessment of trends in the fishery and to further assess the study results for 2003.

PROPOSED ACTIONS TO REVISE THE HALIBUT SUBSISTENCE PROGRAM

Action 1. Revise the subsistence halibut regulations for gear and harvest to address local area issues.

Alternative 1. No action.

- (a) - (c): 30 hooks
three times the individual gear limit
- (d): 30 hooks per vessel

Alternative 2. Change gear and annual limits in local areas.

(a) in Kodiak road zone and Chiniak Bay:

Issue 1. Gear limit, annual limit, and community harvest permit program:

Option 1. 5 hooks and 20 fish annual limit

Option 2. 10 hooks and 20 fish annual limit

Issue 2. Limit stacking on a single unit of gear per trip provided the subsistence user(s) are on board the vessel to:

Option 1. one hook limit (no stacking)

Option 2. two times the hook limit

(b) in Prince William Sound:

Issue 1. Gear limit and community harvest permit program:

Option 1. 5 hooks

Option 2. 10 hooks

Issue 2. Limit stacking on a single unit of gear per trip provided the subsistence user(s) are on board the vessel to:

Option 1. one hook limit (no stacking)

Option 2. two times the hook limit

(c) in Cook Inlet:

Issue 1. Gear limit and community harvest permit program:

Option 1. 5 hooks

Option 2. 10 hooks

Issue 2. Limit stacking on a single unit of gear per trip provided the subsistence user(s) are on board the vessel to:

Option 1. one hook limit (no stacking)

Option 2. two times the hook limit

(d) in Sitka Sound LAMP:

Seasonal gear and vessel limits:

June 1 to August 31

15 hooks per vessel

no power hauling

5 halibut per day/vessel

September 1 to May 31

(30 hooks per vessel)

(power hauling allowed)

10 halibut per day/vessel

Option for areas (a) - (d): Require mandatory retention of rockfish. A fisherman would be required to stop subsistence halibut fishing for that day if the legal limit of rockfish allowed under State regulations were caught. This applies to the current State limits for rockfish only. Subsistence users would not be restricted below current bag limits.

20 + 10
30 + 10
30

Action 2. Revise the list of eligible subsistence halibut communities.

Alternative 1. No action.

Alternative 2. Add to list of eligible communities:

Option 1. Naukati

Option 2. Port Tongass Village

Action 3. Create a subsistence halibut possession limit.

Alternative 1. No action.

Alternative 2. Possession limit equal to two daily bag limits.

Action 4. Revise the definition of charter vessels.

Alternative 1. No action.

Alternative 2. Allow the use of charterboats for subsistence halibut fishing

Alternative 3. Adopt the State of Alaska definition of charter vessels to redefine a charterboat vessel as State-licensed and restrict their use in the subsistence fishery to the owner and identified immediate family members (father, mother, brother, sister, children, legally adopted children).

Action 5. Revise the \$400 customary trade limit for subsistence halibut by IPHC regulatory area.

Alternative 1. No action.

Alternative 2. Revise the customary trade limit to \$100.

Alternative 3. Eliminate the customary trade limit (\$0).

Action 6. Allow subsistence halibut fishing in non-subsistence areas under special permits.

Alternative 1. No action.

Alternative 2. Allow the use of community harvest permits, educational permits, and ceremonial permits in non-traditional use areas by tribes whose traditional fishing grounds are located within these areas, with a 20-fish per day bag limit.

Subsistence

Table 3. Sample Achievement, Alaska Subsistence Halibut Survey for 2003

Tribe/Community ¹	First Mailing			Second Mailing			Third Mailing			Totals					
	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	SHARCs Issued ²	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
AGDAAGUX TRIBE OF KING COVE	28	8	0	20	10	0	10	3	0	28	21	0	21	75.0%	0
ANGOON COMMUNITY ASSOCIATION	118	29	0	89	14	0	74	12	0	118	55	2	57	48.3%	0
AUKQUAN TRADITIONAL COUNCIL	2									2					
CENTRAL COUNCIL TLINGIT AND HAIDA INDIAN TRIBES	537	115	18	404	100	7	297	65	5	537	280	7	287	53.4%	30
CHEVAK NATIVE VILLAGE (KASHUNAMIUT)	5									5					
CHIGNIK LAKE VILLAGE	4									4					
CHILKAT INDIAN VILLAGE	42	5	0	37	16	0	21	13	1	42	34	0	34	81.0%	1
CHILKOOT INDIAN ASSOCIATION	41	19	1	21	10	0	11	4	0	41	33	0	33	80.5%	1
CHINIK ESKIMO COMMUNITY	1									1					
CRAIG COMMUNITY ASSOCIATION	52	23	0	29	10	0	19	4	0	52	37	1	38	73.1%	0
DOUGLAS INDIAN ASSOCIATION	22	4	1	17	7	0	10	0	0	22	11	2	13	59.1%	1
EGEGIK VILLAGE	6	5	0	1	1	0	0	0	0	6	6	0	6	100.0%	0
HOONAH INDIAN ASSOCIATION	199	51	0	147	38	0	109	29	0	199	118	4	122	61.3%	0
HYDABURG COOPERATIVE ASSOCIATION	174	18	0	153	28	4	121	6	2	174	52	94	146	83.9%	6
KENAITZE INDIAN TRIBE	48	15	2	31	14	0	17	5	0	48	34	1	35	72.9%	2
KETCHIKAN INDIAN CORPORATION	639	108	7	523	111	5	406	71	3	639	290	2	292	45.7%	15
KING ISLAND NATIVE COMMUNITY	2									2					
KLAWOCK COOPERATIVE ASSOCIATION	159	27	0	132	36	1	95	32	0	159	95	6	101	63.5%	1
LESNOI VILLAGE (WOODY ISLAND)	259	58	17	184	42	3	139	23	2	259	123	0	123	47.5%	22
METLAKATLA INDIAN COMMUNITY, ANNETTE ISLAND RESERVE	343	42	0	301	47	0	254	40	2	343	129	1	130	37.9%	2
NAKNEK NATIVE VILLAGE	2									2					
NATIVE VILLAGE OF AFOGNAK	22	9	0	13	3	0	10	4	0	22	16	0	16	72.7%	0
NATIVE VILLAGE OF AKHIOK	16	5	0	11	1	1	9	4	0	16	10	2	12	75.0%	1
NATIVE VILLAGE OF AKUTAN	44	4	0	40	8	0	32	2	0	44	14	2	16	36.4%	0
NATIVE VILLAGE OF ALEKNAGIK	2									2					
NATIVE VILLAGE OF ATKA	6	4	0	2	1	0	1	0	0	6	5	0	5	83.3%	0
NATIVE VILLAGE OF BELKOFSKI	2									2					
NATIVE VILLAGE OF CHENEGA	27	5	0	21	3	0	18	6	0	27	14	1	15	55.6%	0
NATIVE VILLAGE OF CHIGNIK	11	0	0	10	4	1	5	3	0	11	7	1	8	72.7%	1
NATIVE VILLAGE OF CHIGNIK LAGOON	33	8	0	24	8	0	16	5	0	33	21	1	22	66.7%	0
NATIVE VILLAGE OF DILLINGHAM (CURYUNG)	16	6	0	10	3	0	7	2	0	16	11	0	11	68.8%	0
NATIVE VILLAGE OF EEK	21	1	0	20	4	0	16	3	0	21	8	0	8	38.1%	0
NATIVE VILLAGE OF EKUK	3									3					
NATIVE VILLAGE OF ELIM	1									1					
NATIVE VILLAGE OF EYAK	46	18	1	27	10	0	17	4	0	46	32	0	32	69.6%	1
NATIVE VILLAGE OF FALSE PASS	13	2	0	11	1	0	10	1	0	13	4	2	6	46.2%	0
NATIVE VILLAGE OF GAMBELL	6	1	0	5	0	0	5	0	0	6	1	2	3	50.0%	0
NATIVE VILLAGE OF GOODNEWS BAY (MUMTRAQ)	15	1	0	14	3	0	11	5	0	15	9	0	9	60.0%	0
NATIVE VILLAGE OF HOOPER BAY	90	11	0	79	12	0	67	13	0	90	36	0	36	40.0%	0
NATIVE VILLAGE OF KARLUK	4									4					
NATIVE VILLAGE OF KIPNUK	89	9	0	80	3	0	77	4	0	89	16	0	16	18.0%	0
NATIVE VILLAGE OF KONGIGANAK	8	3	0	5	3	0	2	0	0	8	6	0	6	75.0%	0
NATIVE VILLAGE OF KWIGILLINGOK	1									1					
NATIVE VILLAGE OF KWINHAGAK	10	2	0	8	1	0	7	1	0	10	4	1	5	50.0%	0
NATIVE VILLAGE OF LARSEN BAY	25	6	0	19	7	1	11	3	1	25	16	0	16	64.0%	2
NATIVE VILLAGE OF MEKORYUK	15	5	0	10	2	0	8	1	0	15	8	0	8	53.3%	0
NATIVE VILLAGE OF NANWALEK	32	7	0	25	8	0	17	0	0	32	15	8	23	71.9%	0
NATIVE VILLAGE OF NAPAKIAK	3									3					
NATIVE VILLAGE OF NIGHTMUTE	4									4					
NATIVE VILLAGE OF NIKOLSKI	12	6	0	6	0	0	6	0	0	12	6	0	6	50.0%	0
NATIVE VILLAGE OF OUZINKIE	30	10	0	20	4	0	16	4	0	30	18	2	20	66.7%	0
NATIVE VILLAGE OF PERRYVILLE	12	2	0	10	2	0	8	3	0	12	7	4	11	91.7%	0
NATIVE VILLAGE OF PORT GRAHAM	42	14	0	21	0	0	21	8	0	42	22	14	36	85.7%	0

Continued

Table 3. Sample Achievement, Alaska Subsistence Halibut Survey for 2003

Tribe/Community ¹	First Mailing			Second Mailing			Third Mailing			Totals					
	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	SHARCs Issued ²	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
NATIVE VILLAGE OF PORT LIONS	53	7	1	45	11	0	34	15	0	53	33	5	38	71.7%	1
NATIVE VILLAGE OF SAVOONGA	41	7	0	33	2	0	27	1	0	41	10	26	36	87.8%	0
NATIVE VILLAGE OF SCAMMON BAY	5									5					
NATIVE VILLAGE OF SHAKTOOLIK	1									1					
NATIVE VILLAGE OF SHISHMAREF	1									1					
NATIVE VILLAGE OF TATITLEK	16	5	0	11	3	0	8	0	0	16	8	6	14	87.5%	0
NATIVE VILLAGE OF TOKSOOK BAY (NUNAKAUYAK)	533	21	0	512	16	3	493	26	1	533	63	46	109	20.5%	4
NATIVE VILLAGE OF TUNUNAK	1									1					
NATIVE VILLAGE OF UNALAKLEET	6	2	0	4	1	0	3	2	0	6	5	0	5	83.3%	0
NATIVE VILLAGE OF UNGA	10	2	0	8	2	0	6	5	0	10	9	0	9	90.0%	0
NATIVE VILLAGE OF WHITE MOUNTAIN	1									1					
NEWTOK VILLAGE	3									3					
NINILCHIK VILLAGE	78	26	0	52	18	0	34	9	0	78	53	0	53	67.9%	0
NOME ESKIMO COMMUNITY	13	0	0	12	4	0	8	2	0	13	6	1	7	53.8%	0
ORGANIZED VILLAGE OF KAKE	119	28	1	90	21	0	69	22	0	119	71	1	72	60.5%	1
ORGANIZED VILLAGE OF KASAAN	3									3					
ORGANIZED VILLAGE OF SAXMAN	58	9	1	47	6	0	41	5	0	58	20	1	21	36.2%	1
ORUTSARARMUIT NATIVE VILLAGE	6	2	0	4	0	0	4	2	0	6	4	0	4	66.7%	0
PAULOFF HARBOR VILLAGE	57	2	0	55	7	0	48	10	0	57	19	0	19	33.3%	0
PETERSBURG INDIAN ASSOCIATION	119	32	4	77	22	1	54	15	0	119	69	13	82	68.9%	5
PLATINUM TRADITIONAL VILLAGE	2									2					
PRIBILOF ISLANDS ALEUT COMMUNITY OF ST GEORGE	26	4	0	22	6	0	16	2	0	26	12	0	12	46.2%	0
PRIBILOF ISLANDS ALEUT COMMUNITY OF ST PAUL	251	20	3	228	9	2	217	13	0	251	42	0	42	16.7%	5
QAGAN TOYAGUNGIN TRIBE OF SAND POINT VILLAGE	34	3	0	31	5	0	26	9	0	34	17	0	17	50.0%	0
QAWALINGIN TRIBE OF UNALASKA	14	3	0	11	4	0	7	3	0	14	10	0	10	71.4%	0
SELDOVIA VILLAGE TRIBE	35	18	1	16	8	1	7	2	0	35	28	0	28	80.0%	2
SHOONAQ' TRIBE OF KODIAK	132	50	0	82	19	0	63	25	0	132	94	0	94	71.2%	0
SITKA TRIBE OF ALASKA	409	107	7	284	73	5	200	25	1	409	205	78	283	69.2%	13
SKAGWAY VILLAGE	1									1					
SOUTH NAKNEK VILLAGE	1									1					
TRADITIONAL VILLAGE OF TOGIAK	6	1	0	5	0	0	5	0	0	6	1	0	1	16.7%	0
UGASHIK VILLAGE	4									4					
VILLAGE OF CHEFORNAK	16	0	0	16	2	0	14	0	0	16	2	0	2	12.5%	0
VILLAGE OF CLARK'S POINT	2									2					
VILLAGE OF KANATAK	11	0	1	10	0	0	10	0	0	11	0	0	0	0.0%	1
VILLAGE OF OLD HARBOR	16	6	0	10	3	0	7	3	0	16	12	2	14	87.5%	0
VILLAGE OF SALAMATOFF	2									2					
WRANGELL COOPERATIVE ASSOCIATION	95	38	3	54	17	0	37	12	0	95	67	0	67	70.5%	3
YAKUTAT TLINGIT TRIBE	53	19	1	33	11	0	22	7	0	53	37	0	37	69.8%	1
Tribal Subtotals	5,578	1,093	70	4,380	854	36	3,478	610	19	5,578	2,557	339	2,896	51.9%	125
ADAK	5									5					
AKHIOK	1									1					
AKUTAN	5									5					
ALEKNAGIK	1									1					
ANGOON	24	8	0	16	7	0	9	4	0	24	19	0	19	79.2%	0
ATKA	13	2	0	11	1	0	10	0	0	13	3	0	3	23.1%	0
BETHEL	4									4					
CHEFORNAK	4									4					
CHENEGA BAY	6	3	0	3	0	0	3	0	0	6	3	0	3	50.0%	0
CHEVAK	4									4					
CHIGNIK	5									5					
CHIGNIK LAGOON	7	2	0	4	0	0	4	4	0	7	6	1	7	100.0%	0

Continued

Table 3. Sample Achievement, Alaska Subsistence Halibut Survey for 2003

Tribe/Community ¹	First Mailing			Second Mailing			Third Mailing			Totals					
	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	SHARCS Issued ²	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
CHIGNIK LAKE	7	3	0	4	1	1	2	2	0	7	6	0	6	85.7%	1
CHINIAK	5									5					
COFFMAN COVE	39	26	0	13	5	0	8	4	0	39	35	0	35	89.7%	0
COLD BAY	18	7	0	11	6	0	5	2	0	18	15	0	15	83.3%	0
CORDOVA	316	154	0	162	77	2	83	26	0	316	257	0	257	81.3%	2
CRAIG	281	136	1	144	59	0	85	33	1	281	228	0	228	81.1%	2
DILLINGHAM	22	17	0	5	2	0	3	2	0	22	21	0	21	95.5%	0
EDNA BAY	43	17	1	25	20	0	5	4	0	43	41	0	41	95.3%	1
EEK	1									1					
ELFIN COVE	16	3	0	13	10	0	3	0	0	16	13	0	13	81.3%	0
ELLAMAR	1									1					
FALSE PASS	6	5	0	1	0	0	1	1	0	6	6	0	6	100.0%	0
GAMBELL	1									1					
GOODNEWS BAY	2									2					
GUSTAVUS	52	25	1	26	9	0	17	6	0	52	40	0	40	76.9%	1
HAINES	380	213	4	163	87	0	76	32	1	380	332	2	334	87.9%	5
HOLLIS	41	15	0	26	11	0	15	9	0	41	35	2	37	90.2%	0
HOONAH	120	53	1	66	20	1	45	10	0	120	83	0	83	69.2%	2
HOOPER BAY	8	0	0	8	0	0	8	4	0	8	4	0	4	50.0%	0
HYDABURG	11	7	0	4	0	0	4	2	0	11	9	2	11	100.0%	0
HYDER	37	9	0	28	9	0	19	11	0	37	29	0	29	78.4%	0
KAKE	61	20	0	41	8	0	33	13	0	61	41	4	45	73.8%	0
KASAAN	16	6	0	10	1	0	9	4	0	16	11	0	11	68.8%	0
KING COVE	11	5	0	6	0	0	6	3	0	11	8	0	8	72.7%	0
KING SALMON	4									4					
KIPNUK	1									1					
KLAWOCK	115	43	1	71	30	0	41	7	0	115	80	0	80	69.6%	1
KLUKWAN	3									3					
KODIAK	1,100	466	20	612	222	2	388	124	2	1,100	812	6	818	74.4%	24
KONGIGANAK	4									4					
KOTLIK	1									1					
KOYUK	1									1					
LARSEN BAY	12	4	1	7	3	0	4	2	0	12	9	0	9	75.0%	1
MEKORYUK	2									2					
METLAKATLA	31	11	0	20	2	0	18	3	0	31	16	0	16	51.6%	0
MEYERS CHUCK	10	4	0	6	4	0	2	0	0	10	8	0	8	80.0%	0
NAKNEK	4									4					
NANWALEK	7	3	0	4	0	0	4	1	0	7	4	2	6	85.7%	0
NEWTOK	1									1					
NIGHTMUTE	25	2	0	23	2	0	21	3	0	25	7	0	7	28.0%	0
NIKOLSKI	5									5					
NOME	7	2	0	5	2	0	3	1	0	7	5	0	5	71.4%	0
OLD HARBOR	37	16	0	21	6	0	15	0	0	37	22	7	29	78.4%	0
OUZINKIE	17	9	1	7	1	0	6	5	0	17	15	0	15	88.2%	1
PELICAN	41	20	0	21	12	0	9	4	0	41	36	0	36	87.8%	0
PETERSBURG	908	451	6	451	188	2	260	82	3	908	721	1	722	79.5%	11
PLATINUM	2									2					
PORT ALEXANDER	20	4	0	16	4	0	12	4	0	20	12	0	12	60.0%	0
PORT GRAHAM	15	3	0	6	0	0	6	0	0	15	3	11	14	93.3%	0
PORT LIONS	24	14	0	10	3	0	7	1	0	24	18	2	20	83.3%	0

Continued

Table 3. Sample Achievement, Alaska Subsistence Halibut Survey for 2003

Tribe/Community ¹	First Mailing			Second Mailing			Third Mailing			Totals					
	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	Mailed	Returned	Undeliverable	SHARCs Issued ²	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
PORT PROTECTION	13	8	0	5	3	0	2	1	0	13	12	0	12	92.3%	0
PT. BAKER	20	11	0	9	6	0	3	2	0	20	19	0	19	95.0%	0
QUINHAGAK	4														
SAND POINT	5														
SAVOONGA	2														
SAXMAN	30	14	0	16	1	0	15	4	0	30	19	0	19	63.3%	0
SCAMMON BAY	5														
SELDOVIA	89	42	2	45	31	0	14	6	0	89	79	0	79	88.8%	2
SHELDON POINT	1														
SITKA	1,224	544	7	673	266	5	402	105	1	1,224	915	6	921	75.2%	13
SKAGWAY	40	23	0	17	10	0	7	2	0	40	35	0	35	87.5%	0
SOUTH NAKNEK	1														
ST GEORGE ISLAND	7	1	0	6	1	0	5	2	0	7	4	0	4	57.1%	0
ST PAUL ISLAND	5														
STERLING	1														
TATITLEK	7	2	0	5	3	0	2	1	0	7	6	0	6	85.7%	0
TENAKEE SPRINGS	36	24	0	12	5	0	7	2	0	36	31	0	31	86.1%	0
THORNE BAY	97	52	0	45	26	0	19	5	0	97	83	0	83	85.6%	0
TOKSOOK BAY	3														
UNALASKA	74	32	1	41	12	1	28	12	0	74	56	0	56	75.7%	2
WHALE PASS	24	17	0	7	6	0	1	0	0	24	23	0	23	95.8%	0
WRANGELL	362	142	6	214	100	1	113	34	1	362	276	2	278	76.8%	6
YAKUTAT	36	9	2	25	10	0	15	4	0	36	23	1	24	66.7%	2
Rural Community Subtotals	6,057	2,737	57	3,252	1,306	15	1,930	601	11	6,057	4,644	53	4,697	77.5%	83
Grand Totals	11,635	3,830	127	7,632	2,160	51	5,408	1,211	30	11,635	7,201	392	7,593	65.3%	208

¹ To protect confidentiality, data for tribes and communities with 5 or fewer SHARCs issued are not reported in this table. Regulatory subtotals include all tribes and communities.

² SHARC = Subsistence Halibut Registration Certificate

Source: Alaska Department of Fish and Game, Division of Subsistence, SHARC survey, 2004

**PUBLIC TESTIMONY SIGN-UP SHEET FOR
AGENDA ITEM C-7 Halibut Subsistence**

	NAME (PLEASE PRINT)	AFFILIATION
1	MIKE MILLER	
2	HARVEY KITKA	SITKA TRIBE + SERAC
3	JOHN LITTLEFIELD	SITKA - SERAC
4	DOUG DOBYNS	SITKA TRIBE
5	KEVIN KRISTOVICH	KETCHIKAN INDIAN COMMUNITY
6	SKY STARKY	ANHSWG
7	JOHN LITTLEFIELD	SELF - SMOA
8	JOEL HANSON	THE BOAT COMPANY
9	LINDA BEHNKEN	ALFA
10	BOB STORRS	UNFA
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

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.

C-3 (a) Habitat Areas of Particular Concern

The AP recommends adding an option to action 2, alternative 3 GOA Corals in SE as follows: Prohibit bottom trawling in subareas and designate remainder of HAPC as a research priority for longline gear impacts. *Motion passed 11/2*

Additionally, the AP recommends information on Canadian bottom contact fisheries in the proposed Dixon Entrance HAPC be included in the analysis. *Motion passed 17/0.*

C-3 (d) Alternative 5B The AP endorses the Aleutian Island trawl industry's attempt to provide data to modify alternative 5B boundaries based on the 200 MT approach. We request the council provide an opportunity and timeframe for this data to be analyzed prior to the December council meeting. *Motion passed 15/1.*

C-7 Halibut Subsistence

The AP recommends the following actions and alternatives:

Action 1. Revise the subsistence halibut regulations for gear and harvest to address local area issues.

Alternative 1. No action.

- (a) - (c): 30 hooks
three times the individual gear limit
- (d): 30 hooks per vessel

Alternative 2. Change gear and annual limits in local areas.

- (a) in Kodiak road zone and Chiniak Bay:
 - Issue 1. Gear limit, annual limit, and community harvest permit program:
 - Option 1. 5 hooks and 20 fish annual limit
 - Option 2. 10 hooks and 20 fish annual limit
 - Issue 2. Limit stacking on a single unit of gear per trip provided the subsistence user(s) are on board the vessel to:
 - Option 1. one hook limit (no stacking)
 - Option 2. two times the hook limit
- (b) in Prince William Sound:
 - Issue 1. Gear limit and community harvest permit program:
 - Option 1. 5 hooks
 - Option 2. 10 hooks
 - Issue 2. Limit stacking on a single unit of gear per trip provided the subsistence user(s) are on board the vessel to:
 - Option 1. one hook limit (no stacking)
 - Option 2. two times the hook limit
- (c) in Cook Inlet:
 - Issue 1. Gear limit and community harvest permit program:
 - Option 1. 5 hooks
 - Option 2. 10 hooks
 - Issue 2. Limit stacking on a single unit of gear per trip provided the subsistence user(s) are on board the vessel to:
 - Option 1. one hook limit (no stacking)
 - Option 2. two times the hook limit
- (d) in Sitka Sound LAMP:
 - Seasonal gear and vessel limits:

<u>June 1 to August 31</u>	<u>September 1 to May 31</u>
15 hooks per vessel	(30 hooks per vessel)
no power hauling	(power hauling allowed)
5 halibut per day/vessel	10 halibut per day/vessel

Option: Apply Sitka Sound LAMP restrictions to all of Area 2C Motion passed 15/1

Option for areas (a) - (d): Require mandatory retention of rockfish. A fisherman would be required to stop subsistence halibut fishing for that day if the legal limit of rockfish allowed under State regulations were caught. This applies to the current State limits for rockfish only. Subsistence users would not be restricted below current bag limits.

Action 2. Revise the list of eligible subsistence halibut communities.

Alternative 1. No action.

Alternative 2. Add to list of eligible communities:

Option 1. Naukati

Option 2. Port Tongass Village

Action 3. Create a subsistence halibut possession limit for areas 2C and/or 3A and/or 3B.

Alternative 1. No action.

Alternative 2. Possession limit equal to two daily bag limits

Alternative 3. A limit of one daily bag limit Motion passed 17/0

Alternative 4. Possession limit equal to two daily vessel limits

Alternative 5. Possession limit equal to one daily vessel limit Motion passed 13/1

Action 4. Revise the definition of charter vessels.

Alternative 1. No action.

Alternative 2. Allow the use of charterboats for subsistence halibut fishing

Alternative 3. Adopt the State of Alaska definition of charter vessels to redefine a charterboat vessel as State- licensed and restrict their use in the subsistence fishery to the owner and identified immediate family members (father, mother, brother, sister, children, legally adopted children), registered. Restrict the use of charter vessel to the owner of record and immediate family (owner must be a qualified subsistence user). Prohibit the use of a charter vessel for subsistence fishing while clients are on board. Prohibit the transfer of subsistence halibut to clients. Motion passed 14/0.

Suboption: Prohibit use of a charter vessel June 1-August 30 for subsistence fishing for halibut. Motion failed 7/7. Minority Report: The minority voted to limit use of a charter vessel by the owner and their immediate family to the season September 1 – May 31. We feel this may help resolve abuses of subsistence provisions by charter vessels while providing for traditional halibut subsistence harvest practices outside the primary charter season. Signed: Duncan Fields, Michelle Ridgway, Eric Olson.

Action 5. Revise the \$400 customary trade limit for subsistence halibut by IPHC regulatory area.

Alternative 1. No action.

Alternative 2. Revise the customary trade limit to \$100.

Alternative 3. Eliminate the customary trade limit (\$0)

Alternative 4. Allow the customary and traditional practice of sharing halibut expenses between:

Option 1: Members of an Alaskan Tribe

Option 2: Members of any recognized Alaska tribe

Option 3: Alaska rural residents

Option 4: Any qualified halibut subsistence user eligible under this program

Option 5: Provisions included under the terms of a community harvest permit

Motion passed 16/0

Alternative 5. Develop recordkeeping requirements for trade involving cash Motion passed 16/0

Action 6. Allow subsistence halibut fishing in non-subsistence areas under special permits.

Alternative 1. No action.

Alternative 2. Allow the use of community harvest permits, educational permits, and ceremonial permits in non-traditional use areas by tribes whose traditional fishing grounds are located within these areas, with a 20-fish per day bag limit.

The AP wishes to note its concern over the accuracy of the subsistence survey for SHARC card members. Reporting on the survey is entirely voluntary. The AP believes survey results need to be verified through dockside sampling or other appropriate independent verification methods. The magnitude of the subsistence harvest increases in some areas dictate increased verification for conservation reasons. Motion passed 15/0.

C-6 Halibut Sablefish IFQ Program

IFQ/CDQ 4C/4D

The AP recommends the Council move the regulatory package for IFQ/CDQ area 4C/4D forward for public review, with following changes:

Alternative 1. No action.

Alternative 2. Allow holders of Area 4C IFQ and CDQ to harvest such IFQ/CDQ in Area 4D.

~~Option: Allow holders of Area 4D IFQ and CDQ to harvest such IFQ/CDQ in Area 4C.~~

At the end of the 3rd year after implementation, the program will be evaluated. Motion passed 17/0

Halibut and Sablefish IFQ program

The AP recommends the release regulatory amendment package for IFQ amendments for public review, with the following changes:

Action 1. Allow the use of medical transfers.

Alternative 1. No action.

Alternative 2. Allow medical transfers.

Add options for evidence of qualifying medical conditions

Option 1: State certified medical professional

Option 2: Licensed medical doctor or their representative

Add a section "Limits to medical transfer"

1. 3 out of 6 years

2. 2 out of 5 years

Action 2. Tighten the criteria allowing the use of hired skippers.

Alternative 1. No action.

Alternative 2. To use the hired skipper exception, a QS holder must demonstrate at least a 20% vessel owner interest in the vessel to be used and have continuously owned the vessel as documented by the contemporary abstract of title for the previous:

a. 6 months

b. 12 months

c. 24 months

d. year to date plus previous calendar year

Add option to allow for replacement vessel in the event of a loss

Action 3. Add vessel clearance requirements to the Bering Sea and Aleutian Islands sablefish fisheries.

Alternative 1. No action.

Alternative 2. Add vessel clearance requirements to the BS and AI sablefish regulations.

Option 1. Add check-in/check-out for the Aleutian Islands and Bering Sea sablefish fishery (e.g., in Dutch Harbor, Adak, St Paul, St George) **The AP recommends the list of communities mirror the list of communities from IPHC for the Halibut Sablefish Check-in Check-out.**

Option 2. Require VMS when fishing in the Aleutian Islands and Bering Sea sablefish fishery

Action 4. Amend the sablefish product recovery rate for bled sablefish.

Alternative 1. No action.

Alternative 2. Change product recovery rate from 0.98 to 1.0.

Expand the discussion on the amount of additional blood loss realized from bled fish (gear code 03) vs. round fish (gear code 01) landed using normal handling practices such as gaffing. The discussion should focus on the role of this difference in determining an appropriate PPR for bled sablefish.

Expand the discussion of the impact of changing the PRR on the stock assessment model.

Action 5. Amend the halibut block program in Areas 2C, 3A, 3B, 4A, 4B, 4C, and 4D

Alternative 1. No action.

Alternative 2. Increase block limits to 3 or 4 blocks

Alternative 3. Unblock all QS blocks that yield more than 20,000 lb

Alternative 4. Allow blocked QS greater than 20,000 lb to be divided into smaller blocks

Alternative 5. Increase the Areas 2C and 3A halibut sweep-up level to the 5,000 lb equivalent in 1996 QS units.

Request staff add a table that shows consolidation of quota share over time by size of holdings
Request staff add a table that provides CEY projections for next 3 years in Area 3B and 4ABC

Action 6. Amend Area 3B, 4A, 4B, 4C, and 4D halibut quota share categories

Alternative 1. No action.

Alternative 2. Allow IFQ derived from D category QS to be fished on C category vessels

Alternative 3. Allow IFQ derived from D category QS to be fished on C or B category vessels

Alternative 4. Combine C and D category QS

Action 7. Amend fish down regulations for Area 2C halibut and Southeast Outside District sablefish

Alternative 1. No action.

Alternative 2. Eliminate the exception to the fish down regulations for Area 2C halibut and Southeast area sablefish

Motion passed 16/0

Additionally, the AP requests the Council staff task with developing a discussion paper that reviews 3 proposals

1. Alaskan Leader Fisheries: Allowing frozen other species on board while fishing IFQ
2. Hubbard: Fish A and/or B, C, D shares any time any order
3. Thompson: Allow use of pot gear in the sablefish fishery during June *Motion passed 16/0*

Further, the AP requests the Council schedule Halibut Sablefish IFQ agenda item as the first item on the agenda for the December 04 meeting. *Motion passed 16/0.*

Jeff Passer
handout 10/9/04

Issue - SUBSISTENCE HALIBUT ON CHARTER VESSELS

Prohibitions at 50 CFR 300.66 make it unlawful for any person to retain subsistence halibut that were harvested using a charter vessel.

Regulations at 50 CFR 300.61 define charter vessel as "a vessel used for hire in sport fishing for halibut, but not including a vessel without a hired operator."

PROBLEM:

This leaves enforcement with no clear definition of charter vessel. The definition above was written for sport fishing is from the IPHC regulations. It is the one we have to refer to when enforcing the subsistence halibut regulations. There are two components to the IPHC definition:

- 1) "a vessel used for hire in sport fishing for halibut" {- subsistence clearly is not sport fishing}; and
- 2) "but not including a vessel without a hired operator." {So, a vessel with a hired operator is a charter vessel.}

Enforcement has always had difficulty proving an operator is for hire. In the past this was mainly a concern of the state of Alaska when they tried to prove a private vessel was being used as a charter when it was not registered as such. Now with subsistence halibut, and halibut charter IFQ coming, the problem has expanded.

If Council intent was only to prohibit subsistence halibut fishers from hiring someone to take them out, then we will do our best to enforce the prohibition the best we can with the current definition.

If Council intent was to control the harvesting capacity of subsistence by keeping vessels which are licenced for charter from being used to harvest subsistence halibut, then we need a new definition.

If Council intent was to do both of the above, then we need a new definition also.

SUGGESTED DEFINITION:

"A charter vessel is one which is ^{Registered} licensed as such by the Alaska Department of Fish and Game at {state regulatory cite}."

This definition allows enforcement to easily identify the vessel, without having to prove if it is for hire. Then, using the current prohibition to not allow the retention of subsistence halibut on a charter vessel is enforceable. The Council may want to consider allowing a charter vessel owner to retain subsistence halibut on his/her vessel by using an exemption to the prohibition such as;

"... except that a charter vessel owner and the owner's immediate family may fish for and retain subsistence halibut on his/her vessel."

[Defining who the immediate family would be required also.]

Enforcement thinks that this definition will work for the charter halibut IFQ regulations as well.

The AP discussed prohibiting the use of charter vessels during the summer months. Enforcement has no problem with this, however, we will still have difficulty identifying when a charter vessel is a charter vessel with the current definition.

There was also discussion of adopting the State's definition of charter vessel. Here are enforcement's concerns with that;

The state's definition contains;

- "used for hire" - this is the problem we have with the IPHC definition
- "personal use" - this is a state term that we do not use, and we do not define
- "subsistence taking" - the state allows it on charter vessels, we do not
- "a charter vessel does not include a vessel or skiff without a charter vessel operator." This is a problem because a "charter vessel operator" is not defined.

Issue - CUSTOMARY TRADE

Regulations at 50 CFR 300.66(j) make it unlawful to;

“Retain or possess subsistence halibut for commercial purposes, cause subsistence halibut to be sold, bartered or otherwise enter commerce or solicit exchange of subsistence halibut for commercial purposes, except that a person who qualified to conduct subsistence fishing for halibut under 50 CFR 300.65(f), and who holds a subsistence halibut registration certificate in the person's name under 50 CFR 300.65(h) may engage in the customary trade of subsistence halibut through monetary exchange of no more than \$400 per year.”

Enforcement has no cases of abuse of the \$400 limit. However, they do not expect to find any. This was their concern 3 years ago when a yearly limit was being discussed. These type cases are very difficult to detect and prove. Over the past two seasons, the major concern has been subsistence halibut entering the commercial market. There are on-going investigations which are not ready to be discussed at this time.

Enforcement feels everyone is in agreement that:

- 1) subsistence halibut should not enter the commercial market; and
- 2) restrictions need to be in place so that no one can make a substantial profit from the sale (or monetary exchange) of subsistence halibut, but that;
- 3) it is ok to trade subsistence halibut for items or other food and to be reimbursed for expenses related to the harvesting.

SUGGESTION:

Change the prohibition to read: It is unlawful to “Retain or possess subsistence halibut for commercial purposes, cause subsistence halibut to be sold, bartered or otherwise enter commerce or solicit exchange of subsistence halibut for commercial purposes;

except that a person who is qualified under 50 CFR 300.65(f)(1) may engage in the customary trade of subsistence halibut ~~through monetary exchange~~ with other SHARC holders in his/her community and;

except those who are a member of an Alaska Native tribe defined at 50 CFR 300.65(f)(2) may engage in the customary trade of subsistence halibut ~~through monetary exchange~~ with any other member of a Alaska Native tribe also defined at 50 CFR 300.65(f)(2).

This suggested prohibition is not perfect. It does not set a dollar limit to the monetary exchange. Although it does not allow non-native rural residents to trade or exchange with friends or relatives outside their community, it does not prohibit them from giving the halibut away. This suggestion does not restrict what can be traded, or what the money may be used for by the harvester. This may or may not matter.

**Operation of Special Permits under the Subsistence Halibut II
Proposed Rule**

Permit Type	Gear Restriction	Harvest Restriction	Area available
Community Harvest Permit (CHP)	30 hooks per qualified SHARC holder on board the vessel up to 90 hooks per vessel	No retention restrictions consistent with customary and traditional use patterns of community harvesters	Area 2C only, except may not be used in Sitka LAMP or Juneau or Ketchikan non-subsistence areas.

Erubba Cook

C-7
Oct 2004



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Office of Subsistence Management
3601 C Street, Suite 1030
Anchorage, Alaska 99503

FSW/OSM/04-12

Stephanie Madsen, Chairman
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501

Dear Madam Chairman:

Enclosed with this letter is Resolution 04-12 from the Southeast Alaska Subsistence Regional Advisory Council concerning proposed changes to current subsistence halibut regulations. The Southeast Alaska Subsistence Regional Advisory Council developed the resolution during its September 27 through 30, 2004, public meeting in Juneau, Alaska.

The Alaska National Interest Lands Conservation Act established the Subsistence Regional Advisory Councils. These Councils advise the Federal Subsistence Board regarding any subsistence matter in their respective regions, and are administered by the Office of Subsistence Management.

Sincerely,

Thomas H. Boyd
Assistant Regional Director

Enclosure

**RESOLUTION 04-14: Pertaining to North Pacific Fisheries Management Council
Proposed Changes to Subsistence Halibut Regulations**

Whereas, the Southeast Alaska Subsistence regional Advisory Council supported through Council resolutions and letters the implementation of subsistence halibut regulations,

Whereas, the North Pacific fisheries Management Council is considering reducing subsistence halibut fishing opportunity through changes in allowed methods and means of harvest and other measures,

Whereas, the proposed changes are not supported by objective scientific data, and

Whereas, proposed changes do not address identified conservation concerns;

Therefore, be it resolved that the Southeast Alaska Subsistence Regional Advisory Council does not support any reduction in subsistence halibut harvest opportunity.

Further, be it resolved that current subsistence halibut fishing regulations should remain in force for five years in order to allow sufficient experience with the fishery to permit objective evaluation of subsistence uses and needs.

John Littlefield, Chair /s/
Southeast Alaska Subsistence Regional Advisory Council
September 30, 2004



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Office of Subsistence Management
3601 C Street, Suite 1030
Anchorage, Alaska 99503

FSW/OSM/04-12

OCT -4 2004

Stephanie Madsen, Chairman
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501

Dear Madam Chairman:

Enclosed with this letter is Resolution 04-12 from the Southeast Alaska Subsistence Regional Advisory Council concerning proposed changes to current subsistence halibut regulations. The Southeast Alaska Subsistence Regional Advisory Council developed the resolution during its September 27 through 30, 2004, public meeting in Juneau, Alaska.

The Alaska National Interest Lands Conservation Act established the Subsistence Regional Advisory Councils. These Councils advise the Federal Subsistence Board regarding any subsistence matter in their respective regions, and are administered by the Office of Subsistence Management.

Sincerely,

Thomas H. Boyd
Assistant Regional Director

Enclosure

**RESOLUTION 04-14: Pertaining to North Pacific Fisheries Management Council
Proposed Changes to Subsistence Halibut Regulations**

Whereas, the Southeast Alaska Subsistence regional Advisory Council supported through Council resolutions and letters the implementation of subsistence halibut regulations,

Whereas, the North Pacific fisheries Management Council is considering reducing subsistence halibut fishing opportunity through changes in allowed methods and means of harvest and other measures,

Whereas, the proposed changes are not supported by objective scientific data, and

Whereas, proposed changes do not address identified conservation concerns;

Therefore, be it resolved that the Southeast Alaska Subsistence Regional Advisory Council does not support any reduction in subsistence halibut harvest opportunity.

Further, be it resolved that current subsistence halibut fishing regulations should remain in force for five years in order to allow sufficient experience with the fishery to permit objective evaluation of subsistence uses and needs.

John Littlefield, Chair /s/
Southeast Alaska Subsistence Regional Advisory Council
September 30, 2004

THE BOAT COMPANY*Operations, Conservation & Reservations*

19623 Viking Avenue, NW

Poulsbo, Washington 98370

Tel (360) 697-4242 Fax (360) 697-5454

www.theboatcompany.com

September 28, 2004

North Pacific Fishery Management Council
604 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252RECEIVED
SEP 28 2004
N.P.F.M.C.

Dear Council Member,

The Boat Company (TBC) is a 501(c)(3) non-profit corporation with a twenty-five year history of natural resource education and conservation advocacy in Southeast Alaska. Our most visible program is the operation of several mid-size tour vessels throughout this region during summer months. Though our company's name may lead one to conclude that boats are our main interest, the fish that swim underneath them can be equally so.

Our involvement in resource policy development is well established. Most recently we submitted proposals to the International Pacific Halibut Commission (IPHC) at their January 2004 annual meeting in Juneau detailing ways we thought the new subsistence halibut regulations may be improved in order to achieve the Commission's important goal of resource protection. The Commissioners determined (perhaps rightly) that the proposals TBC brought before them were more appropriately the province of your Council. So, the Commission voted at their January session to forward our proposals to you for your consideration.¹

Apparently, Council staff has been working hard to attend to some of the issues which gave rise to TBC's proposals earlier this year before the IPHC. Several of our concerns, for instance, will be addressed in the Subsistence III package of actions before you, specifically Action 3 regarding possession limits and Action 5 regarding the \$400 customary trade allowance. We appreciate your staff's efforts on these matters, and applaud them. But in light of information coming out of the recently released report on the subsistence halibut survey we admit to having continued substantial concerns regarding other regulatory inadequacies surrounding the new subsistence halibut program.

As recently as January, representatives from NMFS and ADF&G attending the IPHC conference in Juneau were steadfastly adhering to their preliminary estimate of 170,000 net pounds of subsistence halibut removals for Southeast Alaska Area 2C in 2004. Today, eight months later, Jim Fall of ADF&G Division of Subsistence, discloses that the actual Area 2C subsistence halibut removals in 2003 may have been as high as 985,000 net pounds, or roughly 5.8 times the 2004 projections published in the IPHC's Blue Book in January, which is used to help Commissioners develop setline harvest guidelines. Additionally, Mr. Fall is today declaring that the 2003

¹see minutes of IPHC meeting and attached letter to TBC from Bruce Leaman

Corp. Hdqtrs.: 1730 M Street, NW, #204, Washington, DC 20036 Tel (202) 338-8055 Fax (202) 234-0745
Finance: 15840 Meadow Wood Drive, Wellington, Florida 33414 Tel (561) 792-3763 Fax (561) 792-3862

"Nowhere else on earth is there such an abundance and magnificence of mountains, fjord, and glacier scenery...the Alaska coast is to become the showplace of the earth, and pilgrims, not only from the United States, but from far beyond the seas, will throng in endless procession to see it. Its grandeur is more valuable than the gold or the fish or the timber, for it will never be exhausted."
Henry Gannett, Chief Geographer, Alaska Harrimen Expedition, 1899

The Boat Company
September 28, 2004

Page 2

subsistence halibut removals are actually within the expected range based upon his analysis of available existing subsistence harvest data.

This disclosure brings up two somewhat obvious questions:

1. Why was the "available existing harvest data" not used eight months ago to try to give IPHC some better numbers to work with at their annual meeting in January?; and,
2. Will IPHC now be provided with subsistence halibut removal estimates for 2005 reflecting the likely hood that the total projected catch for the year (Alaska's third year under the new subsistence halibut program) is likely to be considerably greater than the baseline 2003 year results, which were actually only for a *partial* year?

Though the answer to the first of these questions is now merely academic, the answer to the second remains important.

TBC is aware of the fact that, for the time being, the subsistence catch in Southeast Alaska (be it is somewhat higher or somewhat lower than expected) represents only a relatively small percentage of the area's total annual halibut removals. We also recognize that the sport harvest figures for 2003, when they are analyzed and released later this winter, may show a decline in sport catch roughly corresponding to the apparent increase in subsistence catch which we see in the survey results (personally, I have some doubts as to whether this will be the case but I'm looking forward, nonetheless, to the release of this critical information.)

These considerations may give us some comfort, but they are only a temporary comfort considering that subsistence harvests are likely to increase, not diminish, over time and considering that IPHC researchers are predicting a progressive decline in halibut abundance over the next twenty years. If Council members think halibut allocation battles between commercial, sport and subsistence harvesters have been ugly in the past (i.e. under conditions of relatively high abundance) what's to come under conditions of relatively low abundance?

TBC feels that *now* is the time for fisheries managers to exercise caution and restraint because caution and restraint won't come easily when there is less of the resource to go around. In fact, if history can be our guide, what comes most easily in times of a resource shortage is for resource managers to take risks with the resource. For this reason, we urge the Council to proceed conservatively now, and to take action early-on to discourage the unlawful or wasteful abuse of the State of Alaska's new subsistence halibut provisions—*which we, in general, wholeheartedly support.*

In the interest, therefore, of making a good thing better, TBC asks that the Council consider the following proposal in addition to the six actions contained in the current package of Subsistence III proposals before you:

- **Action** - Prohibit the taking or retention of subsistence halibut on board *any* commercial vessel which is engaged in the commercial harvest or transport of commercial catch.

Problem Statement: There is nothing in current regulations to prevent a commercial crabber, dive fisherman or packer from setting long line gear for subsistence halibut and retaining subsistence halibut while engaged in the commercial harvest or transport of other species. Interestingly enough, current rules prevent a commercial salmon troller from subsistence halibut fishing mostly by virtue of the fact that trollers typically have dozens of hooks in their troll pits and hundreds of hooks in boxes under their galley stoves and *current regulations limit the amount of "gear" allowed on board a vessel*

The Boat Company
September 28, 2004

Page 3

engaged in subsistence halibut fishing to no more than 30 hooks per SHARC holder present, up to 90 hooks maximum per vessel. The fact is, most small sport-type boats used for setting subsistence long lines are likely to have a tackle box tucked under a bench somewhere on board which may contain dozens of "illegal" hooks beyond the 30 per person allowed. Obviously, this "hook limit" not only arbitrarily discriminates against commercial trollers in favor of pot fishermen and divers, but may also tend to incriminate honest subsistence harvesters.

TBC feels that commercial and subsistence activities should be kept separate. Allowing both of these pursuits to take place on the same vessel at the same time by the same individuals is antithetical to the generally accepted concept of a "subsistence" endeavor and creates conditions that are ripe for abuse of subsistence privileges.

Proposal: Where other State and Federal laws permit, commercial fishermen engaged in commercial fishing activities for other species should be allowed to continue to sport fish for halibut, and should feel free to take their sport catch home for personal use. Regulations should be established, however, prohibiting such commercial fishermen from engaging in subsistence halibut fishing, with or without the use of long line gear, or retaining subsistence caught halibut with their commercial catch.

Thank you for your consideration of this matter. I will be available during the Sitka meeting if there are additional questions which I may help answer, or feel free to contact me in Sitka at (907) 747-9834 or at joelh@theboatcompany.com.

Respectfully,



Joel Hanson, The Boat Company

Attachment(s)

COMMISSIONERS:

CLIFF ATLEO
PORT ALBERNI, B.C.
JAMES BALSIGER
JUNEAU, AK
RICHARD J. BEAMISH
NANAIMO, B.C.
RALPH O. HOARD
SEATTLE, WA
PHILLIP LESTENKOF
ST. PAUL, AK
JOHN SECORD
VANCOUVER, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

DIRECTOR
BRUCE M. LEAMAN

P.O. BOX 06000
SEATTLE, WA 98145-2000

TELEPHONE
(206) 834-1828

FAX:
(206) 832-2883

February 10, 2004

Michael A. McIntosh
The Boat Company
1730 M Street, NW Suite 204
Washington, D.C. 20036

Dear Mr. McIntosh,

The Commission received your proposals relating to the Alaska subsistence fishery and for a catch record card for the sport fishery in Alaska. These proposals have been forwarded to the North Pacific Fishery Management Council for their consideration, as they do not fall under the Commission mandate. If you have any questions please give us a call.

Sincerely yours,


Bruce M. Leaman
Executive Director

bc: From M. McIntosh
Joel H. Hanson

ALASKA LONGLINE FISHERMEN'S ASSOCIATION
403 Lincoln Street Ste. 237 Sitka, AK 99835

September 27 2004

Members of the Council,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I would like to submit the following comments on Agenda item C-7: Halibut Subsistence.

ALFA members have watched with growing concern the number of subsistence sets in the Sitka area this past summer. Recently released subsistence numbers confirm that effort in 2C in general and the Sitka LAMP in particular has been significant. The report indicates that 60% of the reported State-wide harvest came out of 2C and 17% came out of the Sitka LAMP. In other words, the 2C subsistence harvest increased 20% between 2002 and 2003—or 30% if the sport harvest is included in 2003 as it is in the 2002 number. Keep in mind that accounting did not start until May—months after subsistence halibut fishing started. While the reported State-wide harvest may not be cause for alarm, these numbers should be—particularly when members have reason to believe that actual harvest may be higher than reported. Clearly, additional measures are needed in these areas to maintain consistency with the Council's goal in specifying a subsistence fishery (i.e., to legitimize an existing fishery, not create a new one) and to prevent the localized depletion the LAMP was created to address.

With this in mind, ALFA urges the Council to move ahead with measures contained in the regulatory amendment package before you that impose additional restrictions on the halibut subsistence fishery. In particular, members would like to voice strong support for the option listed under Issue 6: Apply proposed Sitka Sound measures to all of 2C. These measures, which would limit stacking, lower hook and bag limits and prohibit power hauling during the summer months, are essential to maintaining control of the subsistence fishery. ALFA members believe the Council should add 3A to this option, in case additional review of the subsistence numbers suggests that more restrictive measures are needed in this area as well.

ALFA would like to remind the Council that the subsistence amendment package published as a proposed rule this past summer will authorize ceremonial and educational permits to tribes and communities. These permits will allow holders to harvest halibut with few restrictions, compounding existing problems. While the comment period on that amendment package closed over the summer, members should keep it in mind when considering the regulatory amendments before you at this meeting.

In closing: while ALFA members continue to support halibut subsistence opportunities, we are concerned that the subsistence halibut fishery in 2C and the Sitka LAMP in particular is developing into a new and significant fishery. We are concerned about localized depletion of halibut, rockfish and lingcod stocks. We urge the Council to take all possible steps to hold this fishery to the intent of legitimizing an existing fishery, not

creating a new one. For these reasons, ALFA urges the Council to adopt the proposed changes for Sitka Sound, to apply these changes to all of 2C, and to consider adding an option that allows the Council to apply these more restrictive measures to 3A as well.

Thank you for the opportunity to comment.

Sincerely,

**Linda Behnken
(Director, ALFA)**

JOHN H. LITTLEFIELD

P.O. BOX 2212 4102 HALIBUT POINT ROAD SITKA, AK 99835-2212
(907) 747-6866 Voice (907) 747-4737 Facsimile (907) 738-6866 Cell royselectric@gci.net

October 8, 2004

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Re: Proposed Action Amendments to the Halibut Subsistence Regulations

Dear Ms. Madsen,

I am a life-long Alaskan and have lived in Sitka for 58 years. I am a life long halibut subsistence fisherman. My testimony today is in two parts. I will briefly testify on behalf of the Federal Southeast Alaska Subsistence Regional Advisory Council (herein, SERAC). Lastly I will testify as an individual halibut subsistence user.

SERAC developed their present resolution on the pending Halibut III Subsistence regulations on September 30, 2004. Due to the short time frame between our meetings and this meeting I am submitting a copy of SERAC Resolution 04-12 with this testimony for your review at this meeting. A separate cover letter and resolution has been sent to your Anchorage office from the United States Fish and Wildlife Service, Office of Subsistence Management.

SERAC previously submitted a letter in support of the North Pacific Fisheries Management Council proposed action on Halibut Subsistence on March 18, 2002. SERAC continues to support the Halibut Subsistence program because it benefits the rural residents of our region and recognizes long term customary and traditional use patterns of the rural residents of Southeast Alaska.

The position of SERAC in Resolution 04-12 can be summarized simply as to recommend that no more changes should be applied to the existing regulations until sufficient time has passed to evaluate this allocation plan. We have suggested a period of five years.

That concludes my testimony on behalf of SERAC. The remainder of my testimony will be as an individual subsistence user.

My individual comments are specific to Area 2C, including the Sitka Sound LAMP Area.

I support the following Action Items:

Action 1, Alternative 2, Part (d), and a part of the option for area (d),
Action 2, Alternative 2, Option 1 only,
Action 3, Alternative 2,
Action 4, Alternative 3,
Action 5, A new Alternative 4, and
Action 6, Alternative 2.

Action 1, Alternative 2, Part (d), and a portion of the option for area (d)

I have previously testified before the Board of Fish and the Council and served as a member of the Sitka Halibut LAMP area task force on the Halibut Subsistence Program. My testimony today is in support of Actions that are no less than the LAMP recommendations that we supported originally. As an Alaska Native, I knew the LAMP recommendations would diminish our existing customary and traditional practices. Notwithstanding that, I agreed to support the plan because it would legitimize the long-term, customary, and traditional practice of the use of longlines to take halibut and promised to recognize and decriminalize customary trade practices. I accepted those recommendations in order to achieve consensus with the other task force members, who similarly also had problems with some of our recommendations. My acceptance in the end was based on a complete package. The Sitka LAMP Halibut Task Force and the Sitka Local Fish and Game Advisory Committee also accepted that consensus approach and recommendation and the terms were supported by many others. We wanted to show overall community support for these recommendations at all levels.

The language in Part (d) was in the original Sitka LAMP area recommendation. We also expect that, as in the previous sections a through c, we would also benefit from the community harvest permit program. Further, no one ever intended for the restrictions in the Sitka LAMP Area to apply to the remainder of Area 2C or to any other area. We never discussed a return to 2 hooks, as has been suggested by some.

Further restrictions in the Sitka Sound LAMP Area seem unnecessary at this time. I call your attention to the attached spreadsheet titled: "STATEWIDE HALIBUT TOTAL2 SE_W-2003". The information on the spreadsheet under the Actual Survey Year columns is derived from the community harvest surveys completed by the State of Alaska for the listed Area 2C communities. The latest survey year data is used where the communities were surveyed in multiple years. I will compare the data for Sitka first and then for Area 2C. The community harvest survey indicates that the take of halibut in Sitka for 1996 was 165,772 pounds. The per capita poundage was 19 pounds. The next set of columns labeled 2000 Census used the 2000 census data to calculate the estimated halibut removals for 2000. Multiplying 19 pounds by 8,835 people yields an estimated take of 167,865 pounds. Note that these columns are calculated and not a result of surveys.

The third set of columns are from the 2003 State of Alaska subsistence survey draft table provided by Jim Fall. The table is titled "Table. Estimated Subsistence Harvests of Halibut by Place of Residence, 2003, Number and Pounds of Halibut and Pounds Net Weight". A copy of this draft table is attached to this testimony. The final version of the 2003 State of Alaska report will have a similar table inserted to show the combined take of tribal and other residents by place of residence. There is a slight variance between summing the numbers shown in these tables. According to the author they are the result of rounding and confidentiality. They are minor enough to be ignored.

The halibut take in pounds was entered from this table and the per capita amounts were calculated using the 2000 Census figure. The estimated 2003 take in Sitka was 175,121 pounds of halibut. The per capita poundage is 20 pounds per person.

All three sets of data indicate the halibut removals in the Sitka area are remarkably similar for each time frame shown in the columns. The same comparison process was used to compare the other communities shown. It is noteworthy that the Actual Surveys totals did not include the bottom seven communities or areas but they did include Game Creek and Whitestone Logging Camp which are not shown in the 2003 survey. The 1996 survey data for these two communities showed 2,231 and 8,354 pounds of take respectively. Allowing for some take in the remaining areas of Area 2C probably means the Actual Surveys Column take was more than shown.

In general, the comparison of the remaining cities and total removals for Area 2C communities closely track the Sitka results.

The Total Actual Survey Year take in Area 2C was 652,307 pounds.

The Total 2000 Census Year take in Area 2C was 619,576 pounds.

The Total 2003 State of Alaska take in Area 2 C was 627,476 pounds.

The average per capita poundage by the Actual Survey Year results was 39 pounds.

The average per capita poundage in the 2003 State of Alaska survey was 33 pounds.

It was quite heartening to see that the 2003 State of Alaska subsistence survey results closely mimicked previous survey results and calculated estimates. The latest survey results are similar enough to easily support the NO ACTION alternative as no unusually large variations have been observed that would indicate immediate action is needed. However, one year is a woefully inadequate amount of time for getting the true picture of halibut removals as the result of an allocative decision. The allocation to the subsistence halibut fishery will only be accurately measured over the long term. Once sufficient time has passed to account for natural variables and adjustment by the users the true halibut subsistence removals will become apparent. A timeframe of at least five years would seem to be the minimum amount of time required to achieve a high level of confidence in the numbers. It is noteworthy that the State of Alaska requires the enhanced salmon gear group allocation plan be evaluated on a five year rolling average and then to be consistently discrepant for at least three years before changes are made. The State of Alaska abstract to the technical report also recommend several years to allow trends to

develop. It seems much wiser to allow the halibut subsistence program to get a track record without inserting so many variables that the true cause of any changes in harvest cannot be ascertained with any certainty. Additionally, limiting changes honors the consensus recommendations of the users in the Sitka Sound Lamp Area and the remainder of Area 2C. Any significant deviations from the norm that become apparent can be dealt with by the Council if needed. Such action is surely not indicated at this time. In fact, the results of the 2003 survey weigh heavily in favor of taking NO ACTION at this time. The take in 2003 for all practical purpose is identical to previous surveys and probably within any reasonable margins of error.

I do not support any reductions in gear and harvest limits below what we agreed to in the original LAMP Process. I would however support leaving the existing gear and harvest methods as they are because they have not shown any large scale deviance from previous surveys at this time and can easily be addressed in the future. Leaving the gear and harvest limits unchanged is beneficial to the subsistence users.

I am also supporting the option for area (d) to require the mandatory retention of rockfish. I support the first sentence only to require the mandatory retention of rockfish, I do not support the remainder of the language in that paragraph. If a fisherman caught one rockfish on his first hook and that was the legal limit, would the fisherman be required to cut off his line to remain in compliance? This action would also allow the State of Alaska to eliminate subsistence halibut fishing by setting the rockfish limits at zero. There are no limits on the subsistence take of rockfish for subsistence purposes nor should there be in the future. The amount of rockfish taken by subsistence fisherman should somewhat parallel the percentage of take of halibut. By that standard, the take by subsistence users of several percent of the total rockfish harvest is insignificant to the overall health of the rockfish stocks. The halibut subsistence fisherman should not be required to shoulder the burden of over fishing caused by other users. All halibut subsistence fisherman, should have very little objection to requiring mandatory retention of rockfish, indeed, most halibut subsistence fisherman probably already keep every rockfish they catch. To simply release a fish that would otherwise die is not consistent with customary and traditional practices. Rockfish are not by-catch or waste, they are food. Mandatory retention should also provide better numbers of the rockfish. Mandatory retention should also apply to lingcod. It seems reasonable to apply mandatory retention of rockfish and lingcod throughout Area 2C including the Sitka LAMP.

Action 2, Alternative 2, Option 1 only

I support Action 2, alternative 2, option 1 to add Naukati to the list of eligible communities. Naukati is considered an eligible rural community for the purposes of the ANILCA subsistence management program. Inclusion of Naukati meets the test of additional communities as originally described by the Council, namely that a community could be added as an eligible subsistence halibut community when so listed by the State or ANILCA. The take in Naukati of 539 pounds is insignificant.

Action 3, Alternative 2

I also support Action 3, alternative 2 to create a subsistence halibut possession limit equal to two daily bag limits. Although this was not one of the original recommendations it does not seem unreasonable and will ease the enforcement problem. One thing I do have a problem with is how this Action will be applied to fishermen transiting the Sitka Sound LAMP area. If a halibut subsistence fishermen had two Area 2C daily bag limits aboard, how could they transit the LAMP Area when returning to port without breaking the law? This needs to be addressed. Otherwise, this alternative seems reasonable and should also be applied to the Sitka Sound LAMP area bag limits.

Action 4, Alternative 3

I also support Action 4, alternative 3 to revise the definition of charter vessels by adopting the State of Alaska definition of charter vessels. The charter vessels should also be required to have some clear, defining identifier. I would suggest the letter C similar in size and location as the letters HT now required on hand troll vessels. Adoption of the State of Alaska definition will still allow families to participate in the halibut subsistence program on their charter boats.

Action 5, A new Alternative 4

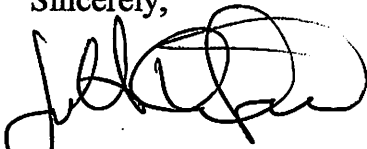
I support a new alternative for Action 4. I support developing by consensus with the National Marine Fisheries Service, Law Enforcement and Alaska Native Halibut Subsistence Working Group a recommendation that will allow a proxy halibut subsistence fisherman to be reimbursed for his expenses without law enforcement considering his actions to be a commercial enterprise. I note that this is similar to what is proposed by Senator Stevens in his Senate rider addition to the ANILCA proxy hunter and fisherman program. The allowable conditions should be agreed to by consensus. Personally I believe the definition of customary trade might be better defined as *“the exchange for cash of subsistence-caught halibut legally taken under federal halibut subsistence regulations. The exchange for cash shall be a customary and traditional practice. No subsistence-caught halibut shall enter commerce at any point.”* I believe that putting any limit on the amount of sales will encourage all subsistence users to try to reach that limit. Surely there is a way to craft language that will allow halibut subsistence fisherman to practice their customary trade without being criminalized and I encourage such direction from the Council.

Action 6, Alternative 2

Lastly, I support Action six, alternative 2 to allow subsistence halibut fishing in nonsubsistence areas under special permits. The Tribal halibut subsistence fishermen participating in the fishery that live in nonsubsistence use areas must many times put their lives at risk by traveling long distances in small boats to catch halibut. This is unsafe and puts many Tribal members at unnecessary risk. This is a completely reasonable request.

Thank you for considering my viewpoints. I will be willing to answer any questions you may have.

Sincerely,



John H. Littlefield

Encl:	SERAC Resolution 04-12	2 pages
	Spreadsheet Statewide Halibut Total SE_W-2003	1 page
	Table. Estimated Subsistence Harvest of Halibut by Place of Residence, 2003, Number of Halibut and Pounds Net Weight	6 pages

#	Year of Survey	Place Communities located in Area 2C	Actual Survey Year		2000 Census		2003 State of Alaska	
			Total Halibut Pounds	Pounds per Per/Capita	Calculated removals Census	Halibut Pounds	Subsistence Survey Halibut Pounds	PerCapita Pounds
1	1996	Angeon	23,508	40	572	22,880	20,274	35
2	1987	Coffman Cove	10,707	50	199	9,950	5,177	26
3	1998	Craig	54,116	31	1,397	43,307	45,620	33
4	1998	Edna Bay	3,301	63	49	3,087	4,866	99
5	1987	Elfin Cove	1,857	31	32	992	858	27
6	1987	Gustavus	9,540	63	429	27,027	4,369	10
7	1996	Haines	28,571	13	1,811	23,543	31,826	18
8	1998	Hollis	3,160	20	139	2,780	NOT SHOWN	0
9	1996	Hoonah	25,502	29	860	24,940	61,204	71
10	1997	Hydaburg	21,350	53	382	20,246	20,781	54
11	1987	Hyder	3,711	48	97	4,656	682	7
12	1996	Kake	25,531	34	710	24,140	22,234	31
13	1998	Kasaan	7,253	166	39	6,474	1,349	35
14	1997	Klawock	35,391	42	854	35,868	30,335	36
15	1996	Klukwan	418	4	139	556	NOT SHOWN	0
16	1987	Metlakatla	12,435	8	1,375	11,000	26,201	19
17	1987	Meyers Chuck	2,312	77	21	1,617	401	19
18	1987	Pelican	13,600	57	163	9,291	11,490	70
19	1987	Petersburg	119,176	32	3,224	103,168	55,811	17
20	1987	Port Alexander	3,310	31	81	2,511	1,289	16
21	1996	Port Protection	3,240	33	63	2,079	NOT SHOWN	0
22	1996	Point Baker	2,270	48	35	1,680	2,769	79
23	1987	Saxman	2,627	10	431	4,310	NOT SHOWN	0
24	1996	Sitka	165,772	19	8,835	167,865	175,121	20
25	1987	Skagway	3,715	6	862	5,172	684	1
26	1987	Tenakee Springs	4,412	47	104	4,888	3,509	34
27	1998	Thome Bay	10,961	21	557	11,697	13,283	24
28	1987	Wrangell	54,561	19	2,308	43,852	32,863	14
29	NONE	DOUGLAS					76	unknown
30	NONE	JUNEAU					14,918	unknown
31	NONE	KETCHIKAN					37,634	unknown
32	NONE	NAUKATI					539	unknown
33	NONE	OTHER COMMUNITIES					564	unknown
34	NONE	WARD COVE					246	unknown
35	NONE	WHALE PASS					503	unknown
Area 2C Total Removals			652,307	1,095	25,768	619,576	627,476	795
Average take per community			23,297			22,128	17,928	
Average per capita pounds				39				33

28 Communities are used to calculate per-capita column average.

24 Communities are used for 2003 per capita calculation.

2000 Census Halibut Pounds (#) was calculated by multiplying the 2000 census figure by the per capita amount from previous survey years. Note that there are no previous year entries for communities 29 through 35.

2003 subsistence survey columns are from Table supplied by Jim Fall titled: Estimated Subsistence Harvests of Halibut by Place of Residence, 2003, Number of Halibut and Pounds Weight. The per capita amount was calculated by dividing the 2000 census figures into the 2003 catch.

Table. Estimated Subsistence Harvests of Halibut by Place of Residence, 2003, Number of Halibut and Pounds Net Weight

City	State	SHARCs Issued	Subsistence Fished?	Subsistence Harvest		Sport Fished?	Sport Harvest		Lingcod (while halibut fishing)		Rockfish (while halibut fishing)	
			Estimated Number	Estimated Number	Estimated Net Pounds	Estimated Number	Estimated Number	Estimated Net Pounds	Estimated Number with Harvest	Estimated Number of fish	Estimated Number with Harvest	Estimated Number of fish
Adak	AK	6	6	27	686	2	25	375	0	0	2	5
Akhiok	AK	15	14	55	1,842	0	0	0	2	16	0	0
Akutan	AK	50	39	313	9,612	12	20	450	8	412	18	817
Aleknagik	AK	1										
Anchor Point	AK	11	4	6	155	10	48	1,010	0	0	0	0
Anchorage	AK	163	37	465	11,219	29	523	18,876	3	4	8	80
Angeon	AK	151	80	1142	20,274	28	105	2,001	2	4	12	82
APO	AK	1										
Atka	AK	13	4	35	1,624	4	17	812	4	43	0	0
Auke Bay	AK	2										
Bethel	AK	10	4	6	44	0	0	0	0	0	0	0
Big Lake	AK	2										
Chefornak	AK	20	20	472	3,492	0	0	0	4	48	4	24
Chenega Bay	AK	13	13	132	5,644	4	8	150	4	24	9	246
Chevak	AK	10	8	0	0	0	0	0	0	0	0	0
Chignik	AK	21	19	340	12,893	7	118	5,358	6	15	3	62
Chignik Lagoon	AK	34	28	176	2,921	3	9	180	0	0	0	0
Chignik Lake	AK	7	6	35	360	4	14	211	2	9	1	2
Chiniak	AK	25	21	137	4,481	14	69	2,289	4	5	8	61
Chugiak	AK	6	0	0	0	0	0	0	0	0	0	0
Clarks Point	AK	2										
Coffman Cove	AK	39	30	191	5,177	18	83	1,636	3	4	9	65
Cold Bay	AK	18	13	92	2,265	8	25	657	2	55	0	0
Cordova	AK	358	102	814	15,506	144	696	11,540	28	104	35	367
Craig	AK	429	210	1859	45,620	117	545	9,881	29	67	94	848
Dillingham	AK	35	10	22	395	7	16	213	0	0	1	10
Douglas	AK	20	2	5	76	0	0	0	0	0	0	0
Dutch Harbor	AK	42	18	152	4,247	21	106	3,165	0	0	4	61
Eagle River	AK	7	1	14	378	3	5	114	0	0	0	0
Edna Bay	AK	17	13	47	2,114	7	12	479	4	14	8	140
Eek	AK	21	8	16	608	0	0	0	0	0	0	0
Elfin Cove	AK	16	6	37	858	1	1	47	1	1	1	2
Excursion Inlet	AK	2										
Fairbanks	AK	6	1	0	0	0	0	0	0	0	0	0

False Pass	AK	13	9	129	1,753	1	2	38	1	60	1	35
Fritz Creek	AK	2										
Gambell	AK	7	7	4	105	0	0	0	2	60	2	4
Golovin	AK	1										
Goodnews Bay	AK	17	12	129	3,926	0	0	0	0	0	0	0
Gustavus	AK	52	27	244	4,369	18	79	1,521	0	0	1	6
Haines	AK	473	270	1397	31,826	96	120	2,866	14	46	38	222
Hollis	AK	5										
Homer	AK	26	7	74	1,458	6	31	566	1	2	0	0
Hoonah	AK	315	138	2105	61,204	56	442	7,002	6	19	14	258
Hooper Bay	AK	94	33	160	788	2	0	0	5	12	0	0
Hydaburg	AK	177	62	450	20,781	15	33	2,642	15	112	30	651
Hyder	AK	36	12	26	682	5	12	264	0	0	0	0
Juneau	AK	358	88	727	14,918	58	172	3,181	6	7	13	174
Kake	AK	175	73	555	22,234	19	35	765	8	36	14	110
Karluk	AK	1										
Kasaan	AK	14	7	54	1,349	0	0	0	0	0	3	9
Kasilof	AK	8	0	0	0	2	7	83	0	0	0	0
Kenai	AK	50	11	96	1,932	20	53	897	0	0	1	4
Ketchikan	AK	781	184	1509	37,634	145	497	8,783	21	90	69	642
King Cove	AK	44	23	399	7,856	3	19	379	1	53	1	133
King Salmon	AK	3										
Kipnuk	AK	89	67	595	8,269	0	0	0	11	28	6	6
Klawock	AK	285	100	909	30,335	46	267	4,929	16	74	34	477
Kodiak	AK	1320	642	6489	152,375	497	2810	67,944	70	215	110	1248
Kongiganak	AK	12	12	84	1,599	0	0	0	0	0	2	2
Larsen Bay	AK	21	20	242	5,672	17	68	1,365	0	0	3	29
Marshall	AK	1										
McGrath	AK	4										
Mekoryuk	AK	15	9	113	1,784	0	0	0	4	15	0	0
Metlakatla	AK	360	121	847	26,201	45	42	1,013	20	36	46	273
Meyers Chuck	AK	10	8	15	401	1	1	17	0	0	0	0
Naknek	AK	5										
Nanwalek	AK	37	31	569	8,080	1	14	209	3	19	5	330
Napakiaik	AK	3										
Naukatl	AK	7	3	9	539	0	0	0	1	4	3	79
Newtok	AK	4										
Nightmute	AK	29	18	451	6,632	0	0	0	0	0	0	0
Nikiski	AK	3										
Nikolski	AK	16	7	30	1,852	3	6	619	0	0	2	40
Ninilchik	AK	51	18	181	3,533	12	98	1,406	3	9	1	110
Nome	AK	10	5	0	0	0	0	0	0	0	0	0

Old Harbor	AK	46	35	191	5,205	15	28	911	2	28	4	286
Ouzinkle	AK	39	28	212	5,158	9	28	693	5	7	8	90
Palmer	AK	3										
Pelican	AK	51	37	425	11,490	15	22	572	11	44	21	279
Perryville	AK	11	8	81	1,808	1	2	41	0	0	0	0
Petersburg	AK	1047	416	2980	55,811	269	871	19,646	13	47	65	424
Platinum	AK	2										
Point Baker	AK	27	18	135	2,769	9	27	429	2	3	10	115
Port Alexander	AK	21	10	51	1,289	5	38	176	0	0	5	25
Port Graham	AK	52	35	690	11,465	3	9	156	4	52	7	182
Port Lions	AK	68	42	326	6,771	26	150	2,651	3	5	3	12
Quinhagak	AK	15	12	47	1,163	0	0	0	0	0	0	0
Saint George Island	AK	31	17	159	2,044	0	0	0	0	0	0	0
Saint Paul Island	AK	250	82	1010	19,754	6	35	876	18	99	12	93
Sand Point	AK	73	21	225	4,826	11	17	410	1	10	6	29
Savoonga	AK	43	19	71	4,280	0	0	0	1	1	0	0
Scammon Bay	AK	7	4	25	182	0	0	0	0	0	0	0
Seldovia	AK	103	54	918	17,384	38	259	4,567	6	29	13	121
Seward	AK	10	0	0	0	0	0	0	0	0	0	0
Shishmaref	AK	1										
Sitka	AK	1639	821	6630	175,121	402	1380	32,453	259	986	352	4359
Skagway	AK	44	21	42	962	18	29	829	3	21	2	16
Soldotna	AK	7	4	28	225	0	0	0	0	0	0	0
South Naknek	AK	1										
Sterling	AK	4										
Sutton	AK	1										
Tatitlek	AK	19	17	127	4,514	1	2	68	1	11	9	122
Tenakee Springs	AK	36	21	131	3,509	23	65	1,322	0	0	10	87
Thorne Bay	AK	99	61	387	13,283	40	73	2,089	4	5	22	263
Togiak	AK	2										
Toksook Bay	AK	532	54	1397	24,309	0	0	0	13	45	5	41
Trapper Creek	AK	1										
Unalakleet	AK	1										
Unalaska	AK	50	32	377	6,602	12	93	2,348	4	35	4	40
Valdez	AK	22	16	65	1,612	7	0	0	3	4	9	38
Ward Cove	AK	25	4	4	246	8	6	139	0	0	0	0
Wasilla	AK	18	4	37	764	4	6	491	2	4	4	9
Whale Pass	AK	3										
White Mountain	AK	1										
Whittier	AK	1										
Willow	AK	1										
Wrangell	AK	466	221	1348	32,863	112	252	5,888	13	60	38	301

Yakutat	AK	85	39	454	10,244	18	90	2,041	21	77	12	192
Gilbert	AZ	1										
Glendale	AZ	1										
Mesa	AZ	2										
Peoria	AZ	1										
Aliso Viejo	CA	1										
Alpine	CA	1										
Crescent City	CA	1										
Eureka	CA	2										
Harbor City	CA	1										
La Mesa	CA	1										
Los Angeles	CA	2										
Middletown	CA	1										
Morro Bay	CA	1										
Oxnard	CA	2										
Penn Valley	CA	1										
Redlands	CA	1										
Rio Dell	CA	1										
Sacramento	CA	1										
San Clemente	CA	1										
San Francisco	CA	1										
Vallejo	CA	1										
Victorville	CA	1										
Walnut Creek	CA	2										
Denver	CO	1										
Littleton	CO	1										
Longmont	CO	1										
Parker	CO	1										
Washington	DC	1										
Daytona Beach	FL	2										
Lahaina	HI	1										
Sioux City	IA	1										
Nampa	ID	1										
New Plymouth	ID	1										
Warrenville	IL	1										
South Bend	IN	1										
Hutchinson	KS	1										
Westlake	LA	1										
North East	MD	2										
Rising Sun	MD	1										
Coleman	MI	1										
Midland	MI	2										

Petoskey	MI	3																	
White Lake	MI	1																	
Cole Camp	MO	1																	
Hannibal	MO	1																	
Fargo	ND	1																	
Magnet	NE	1																	
VINELAND	NJ	2																	
North Las Vegas	NV	1																	
Tulsa	OK	1																	
Beaverton	OR	1																	
Carlton	OR	1																	
Coos Bay	OR	1																	
Corvallis	OR	1																	
Eugene	OR	2																	
Fairview	OR	1																	
Junction City	OR	1																	
KETCHIKAN	OR	1																	
Lebanon	OR	1																	
McMinnville	OR	2																	
Oregon City	OR	1																	
Philomath	OR	2																	
Portland	OR	3																	
SALEM	OR	3																	
Silverton	OR	1																	
West Linn	OR	1																	
Chattanooga	TN	1																	
Church Hill	TN	1																	
Lewisville	TX	1																	
Brigham City	UT	2																	
Salt Lake City	UT	3																	
Fairfax	VA	1																	
Newport News	VA	1																	
Norfolk	VA	1																	
Amanda Park	WA	3																	
Arlington	WA	2																	
Auburn	WA	2																	
Bellingham	WA	4																	
Bothell	WA	2																	
Bremerton	WA	1																	
Camano Island	WA	1																	
Colville	WA	1																	
Coulee Dam	WA	1																	

Deer Park	WA	1											
Edmonds	WA	2											
Elma	WA	1											
Federal Way	WA	1											
Ferndale	WA	1											
Iiwaco	WA	1											
La Conner	WA	1											
Lacey	WA	2											
Lakewood	WA	1											
Longview	WA	1											
Lynden	WA	1											
Lynnwood	WA	6	0	0	0	0	0	0	0	0	0	0	0
Marysville	WA	1											
McCleary	WA	1											
Mercer Island	WA	1											
Mill Creek	WA	2											
Moclips	WA	1											
Oak Harbor	WA	1											
Omak	WA	1											
Port Orchard	WA	6	0	0	0	0	0	0	0	0	0	0	0
Redmond	WA	2											
Ridgefield	WA	1											
Seattle	WA	9	0	0	0	0	0	0	0	0	0	0	0
Shelton	WA	1											
Stanwood	WA	3											
Tacoma	WA	3											
Union	WA	1											
Vancouver	WA	1											
Westport	WA	1											
Woodway	WA	1											
Yelm	WA	1											
Oshkosh	WI	1											
		11,635	4,894	43,755	1,039,802	2,563	10,735	245,820	703	3,295	1,237	14,838	

Source: Alaska Department of Fish and Game, Division of Subsistence SHARC Survey, 2004

For confidentiality, responses for communities with 5 or less SHARCs issued are not reported separately, but are included in the total.

Prepared 10/8/04. These data are preliminary and may be modified slightly in the final version of Technical Paper No. 288. Contact the Division of Subsistence at 907-267-2353 for more information.