


MEMORANDUM

TO: Council, SSC, and AP Members
FROM: Chris Oliver 
Executive Director
DATE: September 19, 2012
SUBJECT: Pacific Halibut Issues

ESTIMATED TIME 16 HOURS ALL C-1 ITEMS

ACTION REQUIRED

- (a) ADF&G report on final 2011 sport halibut removals.
- (b) Final Action on Halibut Catch Sharing Plan.
- (c) Charter Halibut: Review Methodology for 2013 limits (SSC only).

BACKGROUND

(a) Final 2011 Sport Halibut Removals

Each October, ADF&G provides final estimates of the prior year's sport halibut harvests. These estimates are used for managing the charter halibut fisheries in Area 2C and Area 3A. ADF&G staff will present final 2011 sport halibut removals (Item C-1(a)). Projections for 2012 will not be available for the meeting.

(b) Catch Sharing Plan

The Council is scheduled to take a new final action on a proposed Halibut Catch Sharing Plan (CSP) for Areas 2C and 3A at this meeting. The Council identified a need to develop a CSP for the charter and commercial sectors to address conservation and allocation concerns. While the Council selected its Preferred Alternative in October 2008, supplemental analyses of aspects of the Council's motion were required to complete the analysis for submission to the Secretary. These were reviewed by the Scientific and Statistical Committee, and accepted by the Council, in February 2009. The draft final analysis was submitted to NMFS in September 2009. Recommended revisions from informal reviews by NMFS, and additional revisions of the analyses of the 2008 Preferred Alternative that were requested by the Council, were incorporated into the draft submitted to the Secretary in July 2011. A proposed rule was published in July 2011 and comments were accepted through September 21, 2011.

In September 2011, NMFS informed the Council that additional clarification of policy issues was needed prior to proceeding. In February 2012, the Council reviewed a detailed report by NMFS that included requests for clarification of Council intent on its proposed CSP, and a summary of public comments. The Council requested that the Secretarial Review Draft of the CSP analysis be revised to reflect its clarifications and to respond to public comments. Based on additional information provided by staffs of the Council, NMFS, and ADF&G in April 2012, the Council adopted a new problem statement and revised its previous action (i.e., 2008 PA) by adopting a preliminary preferred alternative (PPA) (which was corrected in June 2012) and additional options

for analysis. The Council scheduled a new final action for October 2012. The analysis was distributed on September 12, 2012. The executive summary is provided under Item C-1(b). The analytical approach originally was approved by the SSC in 2008 and the Secretary for the 2011 public comment period.

There are five proposed alternatives under consideration. The No Action alternative would continue management of the charter halibut sector in these areas under the Guideline Harvest Level (GHL) Program. Annual amendments to federal regulations have been required in Area 2C to match the management measure(s) to constrain charter halibut harvests to the GHL. Overharvest of the GHLs in Area 2C have occurred each year, except for 2011 when harvest was under the GHL by 30%. A new approach implemented a more timely action in Area 2C through the International Pacific Halibut Commission's (IPHC) adoption of annual management measures in January 2012, with publication in the *Federal Register* in March 2012 and an effective date of April 23, 2012.

Alternative 2 is the October 2008 Preferred Alternative. This CSP would: 1) replace the current GHL program; 2) set initial allocations for each sector; and 3) establish a matrix of management measures to control charter halibut harvests to annual allocations; 4) authorize annual transfers of commercial halibut quota to charter halibut permit holders for harvest in the charter fishery to provide flexibility for individual commercial and charter fishery participants; and 5) a prohibition on retention of charter halibut by skippers and crew onboard under all allocations and triggers in both areas. A proposed rule of this alternative was published in July 2011 and comments were accepted through September 21, 2011.

Alternative 3 is the 2012 Preliminary Preferred Alternative (PPA) for a modified CSP; it was adopted in April 2012. In addition to the features identified under Alternative 2, Alternative 3 would replace the fixed matrix of management measures under Alternative 2 with a requirement that annually the Council recommend, and the IPHC adopt, management measures to maintain charter halibut harvests within the respective allocations. Alternative 3 differs from Alternative 2 in three ways: 1) it adjusts the 2008 Preferred Alternative allocation by a) eliminating the $\pm 3.5\%$ target range around the allocations, and b) converting from the statewide harvest survey to logbooks with adjustments for crew harvests for estimating catch; 2) clarifies features of the guided angler fish (GAF) IFQ transfer program; and 3) considers whether to recommend the IPHC implement separate accountability measures for commercial wastage and charter wastage.

Alternative 4 contains the same elements as Alternative 3, except it would increase the allocation to the charter sector by 3.5% of combined charter and commercial catch limit (CCL) at the two lower CCL levels; no adjustment is made to the highest CCL. In its April 2012 motion, the Council labeled those potential allocations as Option 1 (Area 2C) and Option 2 (Area 3A). They represent the 2008 Preferred Alternative + 3.5% of the CCL.

Alternative 5 contains the same elements as Alternative 3, except it would increase the 2012 Preliminary Preferred Alternative (PPA) by the same 3.5% of the CCL at lower CCL levels. They are labeled as Option 1 adjusted (Area 2C) and Option 2 adjusted (Area 3A). These options apply a consistent approach to the 2012 PPA that was applied to the 2008 Preferred Alternative under Alternative 4. Their addition applies a consistent, logical approach to identifying the full range of allocation options and notifies the public of potential action by the Council when it selects its Final Preferred Alternative in October 2012.

A comparison of the alternatives, had they been in effect in 2012, is presented below for each area.

Area 2C comparison of allocations (Mlbs) under Alternatives 1 through 5, had they been in effect in 2012.

Area 2C	2012 combined catch limit	2012 total CEY	Alt. 1 GHL	Alt. 2 2008 PA	Alt. 3 Logbook adjustment only (2012 PPA)	Alt. 4 Options 1 and 2	Alt. 5 Logbook adjustment + Options 1 and 2
Charter	3.460	5.860	0.931	0.599	0.633	0.720	0.754
Commercial			2.529	2.861	2.827	2.740	2.706
			% of combined catch limit				
Charter			26.9%	17.3%	18.3%	20.8%	21.8%
Commercial			73.1%	82.7%	81.7%	79.2%	78.2%

*The IPHC applied 'slow up full down' in Area 2C in 2012.

Area 3A comparison of allocations (Mlbs) under Alternatives 1 through 5, had they been in effect in 2012.

Area 3A	2012 combined catch limit	2012 total CEY	Alt. 1 GHL	Alt. 2 2008 PA	Alt. 3 Logbook adjustment only (2012 PPA)	Alt. 4 Options 1 and 2	Alt. 5 Logbook adjustment + Options 1 and 2
Charter	15.022	19.780	3.103	2.103	2.343	2.629	2.869
Commercial			11.919	12.919	12.679	12.393	12.153
			% of combined catch limit				
Charter			20.7%	14.0%	15.6%	17.5%	19.1%
Commercial			79.3%	86.0%	84.4%	82.5%	80.9%

*The IPHC applied 'slow up full down' in Area 3A in 2012.

(c) Methodology for Selecting Annual Management Measures

The SSC will review a paper that describes the procedures that ADF&G will use to project charter yields under alternative management measures that the Council is likely to consider in the short term. Once approved, the Council has tasked the Charter Management Implementation Committee with selecting a narrow range of alternative management measures for analysis during its October 19, 2012 meeting. ADF&G will provide an analysis of the recommended measures to the Committee and Council at their respective December 2012 meetings. Then, the Committee will recommend and the Council will select a preferred management measure for each area (as needed) to constrain harvest to the respective GHLs in December. The Council will forward its recommendation or consideration by the IPHC for adoption during its January 2013 Annual Meeting, as part of its annual management measures for 2013. This is the same sequence of events for implementation of the U45O68 inch restriction for Area 2C in 2012, with the addition of SSC review of the methodology as requested by the Council. It is hoped that the SSC will review projection methods at this time, and then only as needed as those methods evolve.

Final 2011 Sport Halibut Harvest Estimates Alaska Department of Fish and Game

1. Area 2C Harvest:

Table 1.1. Area 2C sport halibut harvest estimates by sector and subarea, 2011.

Subarea	Charter			Non-Charter		
	Avg. Wt. (lb)	No. Fish	Yield (lb)	Avg. Wt. (lb)	No. Fish	Yield (lb)
Ketchikan	10.5	2,575	27,106	14.8	4,176	61,661
Prince of Wales Island	8.7	8,419	72,863	11.7	8,457	98,937
Petersburg/Wrangell	14.3	1,585	22,719	21.6	6,954	149,861
Sitka	8.7	14,486	125,611	21.5	3,943	84,657
Juneau	9.8	3,693	36,079	12.8	10,602	135,986
Haines/Skagway		0	0	12.8	706	9,055
Glacier Bay	10.2	5,787	59,245	19.7	7,364	145,292
Area 2C	9.4	36,545	343,625	16.2	42,202	685,450

^aAverage net weight (headed and gutted), rounded to the nearest 0.1 lb.

Table 1.2. Approximate 95% confidence intervals for yield estimates (million pounds).

Sector	Estimate	Std. Err.	Lower Limit	Upper Limit
Charter	0.344	0.015	0.315	0.372
Noncharter	0.685	0.046	0.595	0.776
Overall	1.029	0.051	0.929	1.129

^aStandard errors are preliminary estimates.

Table 1.3. Comparison of October 2011 yield projections to final estimates (million pounds).

Sector	Projection	Final	Projection Error (%)
Charter	0.388	0.344	+12.9%
Noncharter	0.925	0.685	+34.9%
Overall	1.313	1.029	+27.6%

Table 1.4. Area 2C sport halibut harvest history by sector.

Year	Charter			GHL (M lb)	Non-Charter			Total Sport Harvest		
	No. Fish	Avg. Wt. (lb)	Yield (M lb)		No. Fish	Avg. Wt. (lb)	Yield (M lb)	No. Fish	Avg. Wt. (lb)	Yield (M lb)
1995	49,615	19.9	0.986	No GHL	39,707	19.3	0.765	89,322	19.6	1.751
1996	53,590	22.1	1.187		41,307	22.8	0.943	94,897	22.4	2.129
1997	51,181	20.2	1.034		53,205	21.4	1.139	104,386	20.8	2.172
1998	54,364	29.1	1.584		42,580	21.5	0.917	96,944	25.8	2.501
1999	52,735	17.8	0.939		44,301	20.4	0.904	97,036	19.0	1.843
2000	57,208	19.7	1.130		54,432	20.6	1.121	111,640	20.2	2.251
2001	66,435	18.1	1.202		43,519	16.6	0.721	109,954	17.5	1.923
2002	64,614	19.7	1.275		40,199	20.3	0.814	104,813	19.9	2.090
2003	73,784	19.1	1.412		45,697	18.5	0.846	119,481	18.9	2.258
2004	84,327	20.7	1.750		62,989	18.8	1.187	147,316	19.9	2.937
2005	102,206	19.1	1.952	60,364	14.0	0.845	162,570	17.2	2.798	
2006	90,471	19.9	1.804	50,520	14.3	0.723	140,991	17.9	2.526	
2007	109,835	17.5	1.918	68,498	16.5	1.131	178,333	17.1	3.049	
2008	102,965	19.4	1.999	66,296	19.1	1.265	169,261	19.3	3.264	
2009	53,602	23.3	1.249	65,549	17.3	1.133	119,151	20.0	2.383	
2010	41,202	26.4	1.086	52,896	16.7	0.885	94,098	20.9	1.971	
2011	36,545	9.4	0.344	42,202	16.2	0.685	78,747	13.1	1.029	

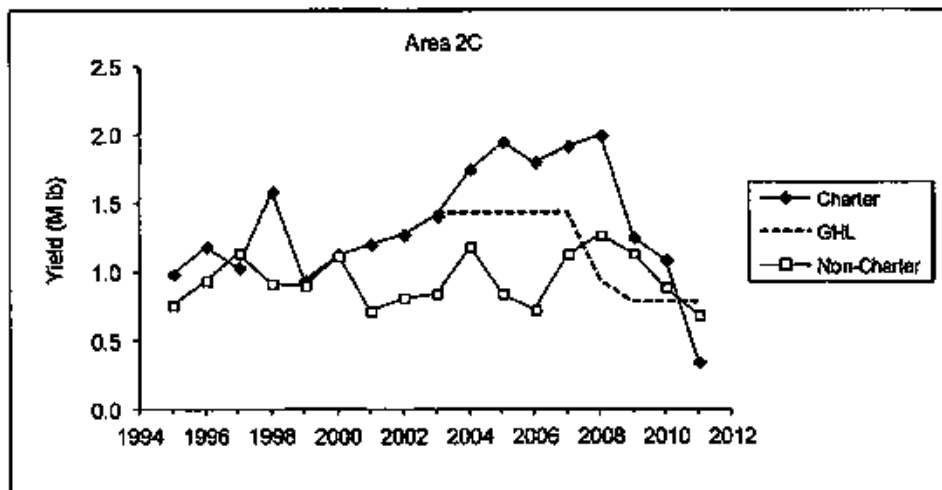


Table 1.5. History of Area 2C charter regulations.

Year	Charter Regulations
1995-2005	Two-fish bag limit (no size restrictions), no limit on crew retention.
2006	Two-fish bag limit (no size limit), state EO prohibiting crew harvest 5/26-12/31.
2007	Two-fish bag limit (1 under 32" eff. 6/1), no crew retention 5/1-12/31 (State EO and Federal Rule).
2008	Two-fish bag limit (1 under 32"), except one-fish bag limit Jun 1-10 (halted by Injunction).
2009	One fish (no size limit), no harvest by skipper & crew, line limit (effective June 5).
2010	One fish (no size limit), no harvest by skipper & crew, line limit.
2011	One fish with maximum size limit of 37", no harvest by skipper and crew, line limit.

2. Area 3A Harvest:

Table 2.1. Area 3A sport halibut harvest estimates by sector and subarea, 2011.

Subarea	Charter			Non-Charter		
	Ave. Wt. (lb) ^a	No. Fish	Yield (lb)	Ave. Wt. (lb)	No. Fish	Yield (lb)
Central Cook Inlet	14.6	45,535	664,249	13.3	35,961	478,212
Lower Cook Inlet	14.8	74,485	1,102,176	11.3	47,547	536,460
Kodiak	14.5	12,984	188,582	15.9	8,172	130,260
North Gulf Coast	13.9	39,250	546,737	10.2	16,432	167,454
Eastern PWS	19.6	5,132	100,644	14.7	8,213	120,636
Western PWS	16.1	2,730	44,085	14.4	11,129	160,153
Yakutat	35.0	3,576	125,307	21.1	1,010	21,340
Glacier Bay	35.9	601	21,587		0	0
Area 3A	15.2	184,293	2,793,367	12.6	128,464	1,614,514

^a - Average net weight, rounded to the nearest 0.1 lb.

Table 2.2. Approximate 95% confidence intervals for yield estimates (million pounds).

Sector	Estimate	StdErr	Lower Limit	Upper Limit
Charter	2.793	0.128	2.542	3.045
Non-Charter	1.615	0.090	1.438	1.791
Overall	4.408	0.158	4.099	4.717

Table 2.3. Comparison of October 2011 yield projections to final estimates (million pounds).

Sector	Projection	Final	Projection Error (%)
Charter	2.837	2.793	1.6%
Non-Charter	1.704	1.615	5.5%
Overall	4.541	4.408	3.0%

Table 2.4. Area 3A sport halibut harvest history by sector.

Year	Charter				Non-Charter			Total Sport Harvest		
	No./Fish	Avg. Wt. (lb)	Yield (M/lb)	GHL (M/lb)	No./Fish	Avg. Wt. (lb)	Yield (M/lb)	No./Fish	Avg. Wt. (lb)	Yield (M/lb)
1995	137,843	20.6	2.845		95,206	17.5	1.666	233,049	19.4	4.511
1996	142,957	19.7	2.822		108,812	17.6	1.918	251,769	18.8	4.740
1997	152,856	22.3	3.413		119,510	17.6	2.100	272,366	20.2	5.514
1998	143,368	20.8	2.985	No GHL	105,876	16.2	1.717	249,244	18.9	4.702
1999	131,726	19.2	2.533		99,498	17.0	1.695	231,224	18.3	4.228
2000	159,609	19.7	3.140		128,427	16.9	2.165	288,036	18.4	5.305
2001	163,349	19.2	3.132		90,249	17.1	1.543	253,598	18.4	4.675
2002	149,608	18.2	2.724		93,240	15.9	1.478	242,848	17.3	4.202
2003	163,629	20.7	3.382	3.650	118,004	17.3	2.046	281,633	19.3	5.427
2004	197,208	18.6	3.668	3.650	134,960	14.4	1.937	332,168	16.9	5.606
2005	206,902	17.8	3.689	3.650	127,086	15.6	1.984	333,988	17.0	5.672
2006	204,115	17.9	3.664	3.650	114,887	14.6	1.674	319,002	16.7	5.337
2007	236,133	16.9	4.002	3.650	166,338	13.7	2.281	402,471	15.6	6.283
2008	198,108	17.0	3.378	3.650	145,286	13.4	1.942	343,394	15.5	5.320
2009	167,599	16.3	2.734	3.650	150,205	13.5	2.023	317,804	15.0	4.758
2010	177,460	15.2	2.698	3.650	124,088	12.8	1.587	301,548	14.2	4.285
2011	184,293	15.2	2.793	3.650	128,464	12.6	1.615	312,757	14.1	4.408

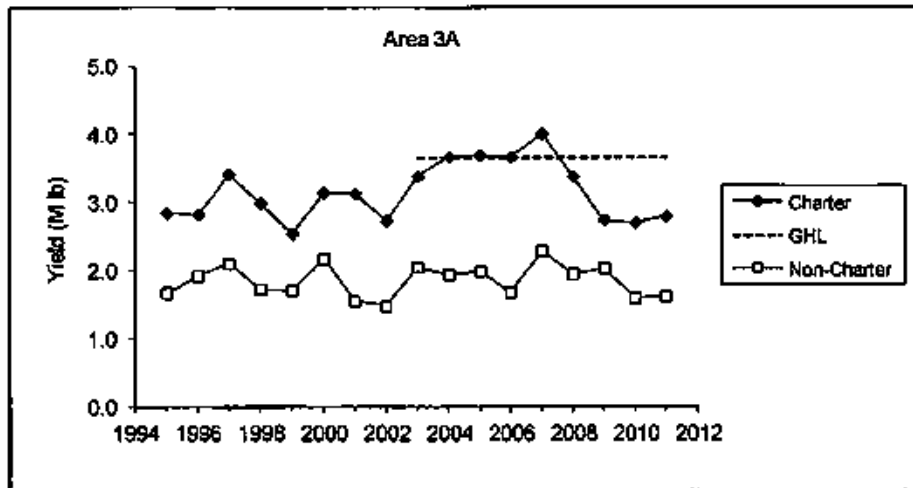


Table 2.5. History of Area 3A charter regulations.

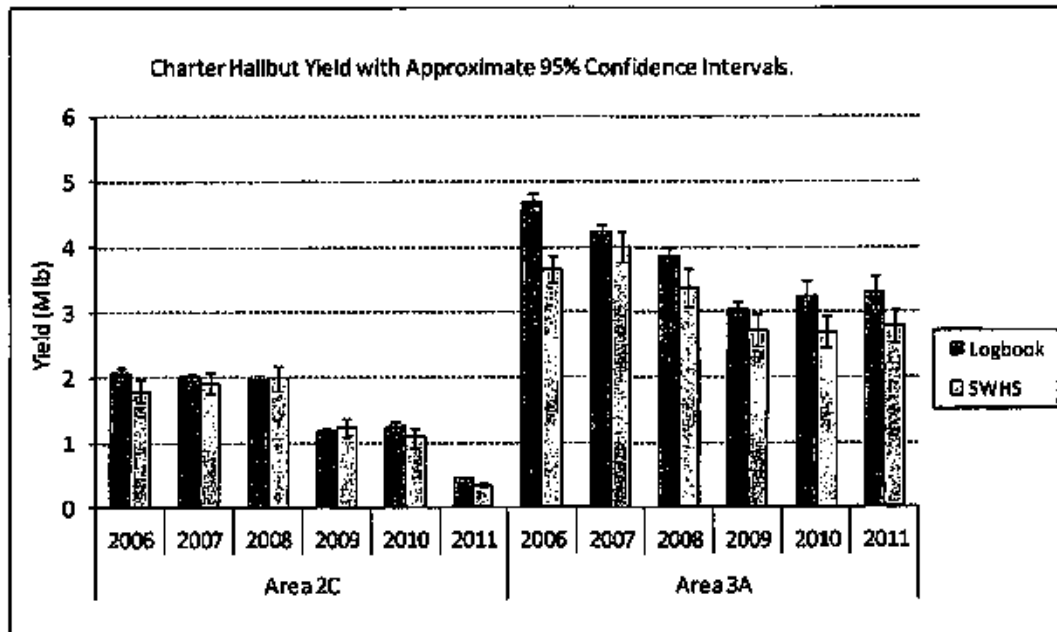
Year	Charter Regulations
1995-2006	Two-fish bag limit (no size restrictions), no limit on crew retention
2007	Two-fish bag limit (no size restrictions), state EO prohibiting crew harvest 5/1-12/31.
2008	Two-fish bag limit (no size restrictions), state EO prohibiting crew harvest 5/24-9/1.
2009	Two-fish bag limit (no size restrictions), state EO prohibiting crew harvest 5/23-9/1.
2010	Two-fish bag limit (no size restrictions), no limit on crew retention
2011	Two-fish bag limit (no size restrictions), no limit on crew retention

3. Comparison of Logbook and Statewide Harvest Survey Estimates

Table 3.1. Comparison of estimates of charter halibut harvest biomass (yield) based on numbers of fish from logbooks and from Statewide Harvest Survey estimates, 2006-2011.

Area	Year	Logbook		Statewide Harvest Survey	
		Yield (M/lb)	StdE	Yield (M/lb)	StdE
2C	2006	2.063	0.052	1.804	0.089
	2007	2.015	0.028	1.918	0.085
	2008	1.974	0.025	1.999	0.099
	2009	1.187	0.022	1.249	0.071
	2010	1.249	0.040	1.086	0.077
	2011	0.452	0.005	0.344	0.015
3A	2006	4.589	0.072	3.664	0.108
	2007	4.229	0.059	4.002	0.120
	2008	3.865	0.063	3.378	0.142
	2009	3.044	0.055	2.734	0.133
	2010	3.238	0.123	2.698	0.116
	2011	3.308	0.133	2.793	0.128

^aStandard errors for Area 2C are preliminary.



EXECUTIVE SUMMARY

This analysis examines proposed changes to the management of Pacific halibut in the charter fisheries and commercial setline fisheries in International Pacific Halibut Commission (IPHC) Regulatory Areas 2C and 3A in the Gulf of Alaska. The North Pacific Fishery Management Council (Council) identified a need to develop a catch sharing plan (CSP) for the charter and commercial sectors to address conservation and allocation concerns in both areas. These concerns resulted from 1) increased harvests in the charter halibut fishery, and 2) decreased catch limits in the commercial setline fisheries. There are five proposed alternatives addressed in this analysis.

	Alternative 1	Alternative 2 <i>2008 Preferred Alternative</i>	Alternative 3 <i>2012 Preliminary Preferred Alternative</i>	Alternative 4 <i>("Option 1&2")</i>	Alternative 5 <i>("Option 1&2" Adjusted)</i>
Type of Council Action	No Action; annual recommendations to IPHC	Regulatory Amendment	Regulatory Amendment; annual recommendations & letter to IPHC	Same as Alternative 3	Same as Alternative 3
Description	Guideline Harvest Level Program continues	Catch Sharing Plan replaces the GHL Program & one fish bag limit in Area 2C	Same as Alternative 2	Same as Alternative 2	Same as Alternative 2
Type of Allocation	Fixed "Target" Allocation in lbs based on halibut abundance	Sector Allocations that float with halibut abundance (fixed percent)	Same as Alternative 2	Same as Alternative 2	Same as Alternative 2
Allocation Basis	125% of average 1995-1999 charter halibut harvest	< Lower Abundance: 125% of average 2001-2005 charter harvest divided by combined charter and commercial halibut harvests > Higher abundance: Area 2C - 2005 charter harvest, Area 3A - 125% of 1995-1999 average harvest	Modified Alternative 2 by: 1) eliminating the $\pm 3.5\%$ target range around the allocations, and 2) adjusting allocations for conversion from the statewide harvest survey to logbooks with crew harvests removed.	Modified Alternative 2 allocations to the charter sector by +3.5% of combined catch limit (CCL) at the two lower (of three) CCL levels	Modified Alternative 3 allocations to the charter sector by +15.5% of CCL at the two lower CCL levels
Allocations	See separate breakout table for specific proposed allocation alternatives				
Action Required if Target Allocation is Exceeded	None; could result in annual Council action and NMFS rule-making, with delayed feedback loop resulting in likely mismatch of measure and current harvest level	None; overages and underages from projections are expected to balance out in the longer term; management matrix controls charter harvests; however Council has identified inadequacies in the matrix	Annual analysis & recommendation of management measure to the IPHC for implementation for upcoming season (replaces matrix). Use of logbooks to manage fishery may reduce uncertainty in harvest projections and choice of annual management measures.	Same as Alternative 3	Same as Alternative 3
Guided Angler Fish Program	No	Yes	Modified Alternative 2	Same as Alternative 3	Same as Alternative 3
Separate Accountability	No	Yes for direct fishery	Yes for direct fishery and wastage	Same as Alternative 3	Same as Alternative 3
Meets Problem Statement	No	Yes, but with deficiencies	Yes	Same as Alternative 3	Same as Alternative 3

The five alternatives primarily are differentiated by proposed allocation choices, along with other program features that are detailed in the list of alternatives and the chart above. The tables show both the status quo alternative and the alternatives defined in the Council motion. Note that the GHL allocation is based on the Total CEY and the CSP allocations are based on the CCL. The proposed range of allocation options for each area is listed in the tables below. Other components, aside from allocation options, also will be addressed in the EA.

Proposed Area 2C charter allocations in this analysis

Alt 1		Alt 2		Alt 3	Alt 4	Alt 5
If Total CEY is greater than (Mlb)	GHL in Mlb (Status Quo)	Combined Catch Limit (CCL)	2008 Preferred Alt.	2012 PPA (2008 PA adjusted for allocation and logbooks)	Option 1 (2008 Pref Alt + 3.5% of CCL)	Option 1 adjusted (2012 PPA + 3.5% of CCL)*
4.779	0.788	< 5 Mlb	17.3%	18.3%	20.8%	21.8%
5.841	0.831	≥ 5 Mlb - 9 Mlb	15.1%	15.9%	18.6%	19.4%
8.903	1.074	≥ 9 Mlb	15.1%	15.9%	15.1%	15.9%
7.965	1.217					
9.027	1.432					

Proposed Area 3A charter allocations in this analysis

Alt 1		Alt 2		Alt 3	Alt 4	Alt 5
If Total CEY is greater than (Mlb)	GHL in Mlb (Status Quo)	Combined Catch Limit (CCL)	2008 Preferred Alt.	2012 PPA (2008 PA adjusted for allocation and logbooks)	Option 2 (2008 Pref Alt + 3.5% of CCL)	Option 2 adjusted (2012 PPA + 3.5% of CCL)*
11.425	2.008	< 10 Mlb	15.4%	17.2%	18.9%	20.7%
13.964	2.373	≥ 10 Mlb - 20 Mlb	14.0%	15.6%	17.5%	19.1%
16.504	2.734	≥ 20 Mlb	14.0%	15.6%	14.0%	15.6%
19.042	3.103					
21.581	3.650					

Environmental Assessment

The Environmental Assessment (EA) evaluates the potential biological, social, and economic impacts of proposed regulations to manage the Pacific halibut fisheries in Area 2C and Area 3A. The proposed action would (1) set an initial allocation between the charter and commercial halibut sectors with accompanying harvest restrictions to limit charter harvests to the respective allocations in Area 2C and Area 3A; (2) implement a market-based program for the charter sector to increase its initial allocations through individual transfers of commercial halibut IFQs; (3) identify a process for setting annual management measures for the charter sector to constrain harvests to the sector's allocation, and (4) account for all removals by sector.

The problem statement that was adopted by the Council reads:

The absence of a hard allocation between the commercial longline and charter halibut sectors has resulted in conflicts between sectors, and tensions in coastal communities that are dependent on the halibut resource. Unless a mechanism for transfer between sectors is established, the existing environment of instability and conflict will continue. The Council seeks to address this instability, while balancing the needs of all who depend on the halibut resource for food, sport, or livelihood.

The purpose of the proposed action is, first, to create a catch sharing plan (CSP) that would set an initial allocation between the charter halibut sector and commercial longline halibut sector, and reduce the time lag between occurrence of an overage and a management response; and, second, to allow the charter sector to increase its initial allocation by compensating the commercial sector for any future reallocations above the level set at initial allocation by using a market-based approach. The proposed sector allocations are intended to stop the uncompensated *de facto* reallocation from the commercial sector to the charter sector. The GHL has been exceeded in Area 2C each year since its implementation in 2004, despite restrictive control measures that were recommended by the Council and implemented by NMFS. The GHL was exceeded in Area 3A from 2004 through 2007. Charter halibut harvests have grown at an average annual rate of 6.8 percent in Area 2C and 4.1 percent in Area 3A, from 1998 through 2006. The number of active vessels, the total number of clients, the average number of clients per trip, and the average numbers of trips per vessel, were at their highest levels in the recorded data period of 1998 through 2006 at the time of Council action. The number of clients per trip has increased steadily in recent years. This indicates that client demand for charter services has been met by the charter sector increasing the supply of trips over those years. It is also likely that the recent economic downturn and the one-fish bag limit in Area 2C have decreased demand for charter trips.

Purpose and Need Statement

The Council is concerned about its ability to maintain the stability, economic viability, and diversity of the halibut industry, the quality of the recreational experience, the access of subsistence users, and the socioeconomic well-being of the coastal communities dependent on the halibut resource. Specifically, the Council noted the need for reliable harvest data would increase as the magnitude of harvest expands in the charter sector. The Council identified the following areas of concern, with respect to the recent growth of halibut charter operations.

- The recent growth of charter operations may be contributing to overcrowding of productive grounds and declining harvests per unit of effort for historical sport, commercial, and subsistence fishermen in some areas.
- As there is currently no limit on the annual harvest of halibut in the charter fishery, an open-ended reallocation from the commercial IFQ sector to the charter industry occurs when charter harvest exceeds the GHL. This reallocation may increase, if the projected growth of the charter industry occurs. The economic and social impact on the commercial IFQ fleet of this open-ended reallocation may be substantial.

- In some areas, community stability may be affected as traditional sport, subsistence, and commercial IFQ fishermen are displaced by charter LEP holders. The uncertainty associated with the present situation and the conflicts that are occurring between the various user groups may also be impacting community welfare.
- Information is lacking on the socioeconomic composition of the current charter industry. Information is needed that tracks (a) the effort and harvest of individual charter operations and (b) changes in business patterns.

Description of Alternatives

Alternative 1. Status quo

Alternative 1 (No Action) would continue management of the charter sector under the Guideline Harvest Limit (GHL) program and harvest control measures. The status quo allows the charter sector in Areas 2C and 3A to harvest up to (and beyond) the GHLs. The GHL is established annually for Areas 2C and 3A, and may be adjusted downward, based on the total CEY that is determined by the IPHC. Such adjustments have occurred in recent years in both areas due to a declining halibut Total Constant Exploitation Yield (TCEY). Annual amendments to federal regulations have been required in Area 2C to match the management measure(s) to control charter halibut harvests to the GHL (Table ES-1).

Table ES-1 Management under the GHL Program

Area	Year	GHL (Mlbs)	Management Measure(s)
2C	2006	1.432	Two fish any size
	2007	1.432	Two fish (1 < 32")
	2008	0.931	Two fish (1 < 32")
	2009	0.788	One fish any size
	2010	0.788	One fish any size
	2011	0.788	One fish < 37"
	2012	0.931	Reverse slot limit (U45 O68)
3A	2006	3.650	Two fish any size
	2007	3.650	Two fish any size
	2008	3.650	Two fish any size
	2009	3.650	Two fish any size
	2010	3.650	Two fish any size
	2011	3.650	Two fish any size
	2012	3.103	Two fish any size

Source: ADF&G, 2012.

*2012 management measures were implemented through the IPHC annual management measures;

2011 measures were implemented through a Secretarial regulatory amendment;

2010 and prior measures were implemented through Council regulatory amendments.

The status quo includes current federal and state regulations that would remain unchanged. Current federal regulations for Area 2C Pacific halibut charters include (1) a one-fish bag limit; (2) a prohibition on the catch and retention of halibut by charter vessel guides, operators, and crew; (3) a limit on the number of lines used to fish for halibut, which must not exceed six or the number of charter vessel clients onboard the charter vessel, whichever is fewer; and (4) a reverse slot limit (U45 O68). The current federal bag limit for Area 3A is two fish of any size per day for Pacific halibut charters. State of Alaska Emergency Order No. 2-R-3-03-09 was issued in 2009 to (1) prohibit the catch and retention of halibut by

charter vessel guides, operators, and crew, while paying clients are on board the vessel; and (2) limit the number of lines used to fish for halibut to no more than the number of charter vessel clients onboard. The emergency order was effective from May 23 through September 1, 2009. The State of Alaska did not issue an Emergency Order for the 2010, 2011, or 2012 fishing seasons.

Alternative 2. (2008 Preferred Alternative) Establish a catch sharing plan that includes sector accountability

Element 1 – Initial allocation and bag limits.

In Area 2C, when the combined charter and commercial setline catch limit is less than 5 Mlb, the charter allocation will be 17.3 percent of the combined charter and commercial setline catch limit. When the combined charter and commercial setline catch limit is 5 Mlb or more the allocation will be 15.1 percent. Management variance not to exceed 3.5 percentage points (plus or minus) may occur around this allocation. The Council's expectation is that the variances will balance over time to ensure IPHC conservation and management objectives are achieved.

Trigger 1: When the combined charter and commercial setline catch limit is < 5 Mlb, the halibut charter fishery will be managed under a 1-halibut daily bag limit. The allocation for the charter sector will be 17.3 percent of the combined charter and commercial setline catch limit. The charter sector's expected catch may vary between 13.8 percent and 20.8 percent. However, if the charter harvest for an upcoming season is projected to exceed 20.8 percent of the combined charter and commercial setline catch limit, then a maximum size limit will be implemented to reduce the projected harvest level to be lower than 17.3 percent of the combined charter and commercial setline catch limit. If the projected charter harvest results in a catch rate (percentage of projected charter harvest divided by the combined commercial and charter catch limit for that Area) that is lower than the lowest charter harvest percentage in that trigger range, then the charter harvest shall be managed under the daily bag limit of the next higher trigger, so long as the projected charter harvest percentage of the combined catch limit falls within the percentage range included under that trigger.

Trigger 2: When the combined charter and commercial setline catch limit is between 5 Mlb and 9 Mlb, the halibut charter fishery shall be managed under a 1-halibut daily bag limit. The charter sector's allocation will be 15.1 percent of the combined catch limit. The charter sector's expected catch may vary between 11.6 percent and 18.6 percent. However, if the charter harvest for an upcoming season is projected to exceed 18.6 percent of the combined catch limit, then a maximum size limit will be implemented to reduce the projected harvest level to 15.1 percent of the combined catch limit. If the projected charter harvest results in a catch rate (percentage of projected charter harvest divided by the combined catch limit for that Area) that is lower than the lowest charter harvest percentage in that trigger range, then the charter harvest shall be managed under the daily bag limit of the next higher trigger, so long as the projected charter harvest percentage of the combined catch limit falls within the percentage range included under that trigger.

Trigger 3: When the combined catch limit is between 9 Mlb and 14 Mlb, the charter halibut fishery shall be managed under a 2-halibut daily bag limit (only one of which may be longer than 32 inches). The charter sector's allocation will be 15.1 percent of the combined catch limit. The charter sector's expected catch may vary between 11.6 percent and 18.6 percent. However, if the charter harvest for an upcoming season is projected to exceed 18.6 percent of the combined catch limit, then the charter fishery will revert back to a 1-halibut daily bag limit. If the projected charter harvest results in a catch rate (percentage of projected charter harvest divided by the combined catch limit for that Area) that is lower than the lowest charter harvest percentage in that trigger range, then the charter harvest shall be managed under the daily bag limit of the next higher trigger, so long as the projected charter harvest percentage of the combined catch limit falls within the percentage range included under that trigger.

Trigger 4: When the combined catch limit is greater than 14 Mlb, the halibut charter fishery will be managed under a 2-halibut daily bag limit. The charter sector's allocation will be 15.1 percent of the

combined catch limit. The charter sector's expected catch may range between 11.6 percent and 18.6 percent. However, if the charter harvest for an upcoming season is projected to exceed 18.6 percent of the combined catch limit, the charter fishery will revert back to a 2-halibut daily bag limit. Only one of the retained halibut may be longer than 32 inches.

Area 2C Combined Catch Limit (million lb)	Allocation	Charter Fishery Bag & Size Limit Regulations		
		If charter harvest within allocation range	If charter harvest projected to exceed allocation range	If charter harvest projected to be below allocation range
<5	Comm alloc = 82.7% Charter alloc = 17.3% Charter range = 13.8-20.8%	One Fish	Maximum size limit imposed that brings harvest to <17.3%	One Fish
≥5 - <9	Comm alloc = 84.9% Charter alloc = 15.1% Charter range = 11.6-18.6%	One Fish	Maximum size limit imposed that brings harvest to <15.1%	Two fish, but one must be less than 32" in length
≥9 - <14	Comm alloc = 84.9% Charter alloc = 15.1% Charter range = 11.6-18.6%	Two fish, one must be less than 32" in length	One Fish	Two Fish
≥14	Comm alloc = 84.9% Charter alloc = 15.1% Charter range = 11.6-18.6%	Two Fish	Two fish, but one must be less than 32" in length	Two Fish

In Area 3A, when the combined charter and commercial setline catch limit is less than 10 Milb, the charter allocation will be 15.4 percent of the combined charter and commercial setline catch limit. When the combined charter and commercial setline catch limit is 10 Milb and above, the allocation will be 14.0 percent. Management variance not to exceed 3.5 percentage points (plus or minus) may occur around this allocation. The Council's expectation is that the variances will balance over time to ensure IPHC conservation and management objectives are achieved.

Trigger 1: When the combined charter and setline catch limit is < 10 Milb, the charter halibut fishery will be managed under a 1-halibut daily bag limit. The charter sector's allocation will be 15.4 percent of the combined charter and setline catch limit. The charter sector's expected catch may vary between 11.9 percent and 18.9 percent of the combined catch. However, if the charter harvest for an upcoming season is projected to exceed 18.9 percent of the combined catch limit, then a maximum size limit will be implemented to reduce the projected charter harvest below 15.4 percent of the combined harvest. If the projected charter harvest results in a catch rate (percentage of projected charter harvest divided by the combined commercial and charter catch limit for that Area) that is lower than the lowest charter harvest percentage in that trigger range, then the charter harvest shall be managed under the daily bag limit of the next higher trigger, so long as the projected charter harvest percentage of the combined catch limit falls within the percentage range included under that trigger.

Trigger 2: When the combined catch limit is between 10 Milb and 20 Milb, the halibut charter fishery will be managed under a 1-halibut daily bag limit. The charter sector's allocation will be 14.0 percent of the combined catch limit. The charter sector's expected catch may vary between 10.5 percent and 17.5 percent of the combined catch limit. However, if the charter harvest for an upcoming season is projected to exceed 17.5 percent of the combined catch limit, then a maximum size limit will be implemented to reduce the projected charter harvest level to 14 percent of the combined catch limit. If the projected charter harvest results in a catch rate (percentage of projected charter harvest divided by the combined catch limit for that area) that is lower than the lowest charter harvest percentage in that trigger range, then the charter harvest shall be managed under the daily bag limit of the next higher trigger, so long as the projected charter harvest percentage of the combined catch limit falls within the percentage range included under that trigger.

Trigger 3: When the combined limit is between 20 Milb and 27 Milb, the halibut charter fishery will be managed under a 2-halibut daily bag limit (only one of which may be longer than 32 inches). The charter sector's allocation will be 14.0 percent of the combined catch limit. The charter sector's expected catch

may vary between 10.5 percent and 17.5 percent of the combined catch limit. However, if the charter harvest for an upcoming season is projected to exceed 17.5 percent of the combined catch limit, then the charter fishery will revert back to a 1-halibut daily bag limit. If the projected charter harvest results in a catch rate (percentage of projected charter harvest divided by the combined catch limit for that Area) that is lower than the lowest charter harvest percentage in that trigger range, then the charter harvest shall be managed under the daily bag limit of the next higher trigger, so long as the projected charter harvest percentage of the combined catch limit falls within the percentage range included under that trigger.

Trigger 4: When the combined catch limit is greater than 27 Mlb, the halibut charter fishery will be managed under a 2-halibut daily bag limit. The charter sector's allocation will be 14.0 percent of the combined catch limit. The charter sectors expected harvest may range between 10.5 percent and 17.5 percent of the combined catch limits. However, if the charter harvest for an upcoming season is projected to exceed 17.5 percent of the combined catch limit, the charter fishery will revert back to a 2-halibut daily bag limit. Only one of the retained halibut may be longer than 32 inches.

Area 3A Combined Catch Limit (million lb)	Allocation	Charter Fishery Bag & Size Limit Regulations		
		If charter harvest within allocation range	If charter harvest projected to exceed allocation range	If charter harvest projected to be below allocation range
<10	Comm alloc = 84.6% Charter alloc = 15.4% Charter range = 11.9-18.0%	One Fish	Maximum size limit imposed that brings harvest to <15.4%	One Fish
≥10 - <20	Comm alloc = 86.0% Charter alloc = 14.0% Charter range = 10.5-17.5%	One Fish	Maximum size limit imposed that brings harvest to <14.0%	Two fish, but one must be less than 32" in length
≥20 - <27	Comm alloc = 86.0% Charter alloc = 14.0% Charter range = 10.5-17.5%	Two fish, one must be less than 32" in length	One Fish	Two Fish
≥27	Comm alloc = 86.0% Charter alloc = 14.0% Charter range = 10.5-17.5%	Two Fish	Two fish, but one must be less than 32" in length	Two Fish

In Areas 2C and 3A, no retention of halibut by skipper and crew while paying clients are on board would be allowed.

Element 2 – Annual regulatory cycle/timeline.

The Council did not adopt an annual regulatory cycle for amending federal regulations. It is the Council's intent to not revisit or readjust bag limits; such bag limit changes will be triggered by changes in combined charter and commercial setline catch limits established annually by the IPHC. Bag limits and maximum size limits would be implemented by the IPHC based upon its determination of the combined catch limits and the bag limit parameters described above.

Element 3 – Supplemental, individual use of commercial IFQ to allow charter limited entry permit holders (LEP) to lease commercial IFQ, in order to provide additional harvesting opportunities for charter anglers, not to exceed limits in place for unguided anglers.

A. Leasing commercial IFQ for conversion to Guided Angler Fish (GAF).

1. A Charter Halibut Limited Access Program (CHLAP) permit holder may lease IFQ for conversion to GAF for use on the LEP.
2. Commercial halibut QS holders may lease up to 1,500 pounds or 10% (whichever is greater) of their annual IFQ to LEP holders (including themselves) for use as GAF on LEPs. If an IFQ holder chooses to lease to a CQE, then the same limitations apply as if they were leasing to an individual charter operator—1,500 lb or 10 % whichever is greater. With regard to CQE leasing: any quota which a CQE holds, regardless of its origin, could be leased up to 100% to eligible residents of the CQE community. For example, a CQE may hold quota share derived from purchase, lease from another qualified CQE, or leased from an individual, and then lease up to 100% of the quota it holds.

3. No more than 400 GAF may be assigned to an LEP endorsed for 6 or fewer clients.
No more than 600 GAF may be assigned to an LEP endorsed for more than 6 clients.

- B. LEP holders harvesting GAF while participating in the charter halibut fishery are exempt from landing and use restrictions associated with commercial IFQ fishery, but subject to the landing and use provisions detailed below.
- C. GAF would be issued in numbers of fish. The conversion between annual IFQ and GAF would be based on average weight of halibut landed in each region's charter halibut fishery (Area 2C or Area 3A) during the previous year as determined by ADF&G.¹
- D. Subleasing of GAF would be prohibited.
- E. Conversion of GAF back to commercial sector.
Unused GAF may revert back to pounds of IFQ and be subject to the underage provisions applicable to their underlying commercial QS either automatically on November 1 of each year or upon the request of the GAF holder if such request is made to NMFS in writing prior to November 1 of each year.
- F. Guided angler fish derived from commercial QS may not be used to harvest fish in excess of the unguided sport bag limit on any given day.
- G. Charter operators landing GAF on private property (e.g., lodges) and motherships would be required to allow ADF&G samplers/enforcement personnel access to the point of landing.
- H. Commercial and charter fishing may not be conducted from the same vessel on the same day.

Alternative 2 was the 2008 Preferred Alternative to replace the GHL Program with a catch sharing plan (CSP) for Area 2C and Area 3A. This CSP would 1) replace the current GHL program; 2) set initial allocations for each sector; and 3) establish a matrix of management measures to control charter halibut harvests to annual allocations; 4) authorize annual transfers of commercial halibut quota to charter halibut permit holders for harvest in the charter fishery to provide flexibility for individual commercial and charter fishery participants; and 5) prohibit retention of charter halibut by skippers and crew onboard under all allocations and triggers in both areas.

The Council intended that the proposed CSP allocations to both sectors vary with halibut abundance, as indicated in its selection of a fixed percentage allocation under its 2008 Preferred Alternative. It would have required pre-season notice of upcoming management measures to allow an uninterrupted charter halibut season. The allocations for the lowest tier of CCLs are based on 125 percent of the 2001–2005 average charter harvest, which was the same formula selected by the Council to set the GHLs (although in fixed pounds). These percentages were the highest percentage allocation options to the charter sector that were considered by the Council and would yield the largest projected gross revenue each year. The allocations at higher CCLs are the second highest percentage allocation options for each area considered by the Council. The analysis found that these allocations would exceed projected harvests from 2009 through 2011 and that more restrictive management measures would not be required. The Council selected a different percentage of the CCL in each area because the initial allocations could have very different impacts as a result of the size of the current constant exploitation yield (CEY) relative to historical CEYs. The plan also identifies specific management measures that would be triggered at different CCLs and identifies a market-based approach for individual charter LEP holders, who are willing buyers, to increase the charter sector allocation by compensating individual commercial IFQ holders, who are willing sellers, for their transferred quota. The plan would include a prohibition on retention of charter halibut by skippers and crew.

¹The Council's long-term plan may require further conversion to some other form (e.g., angler days) in a future action.

While the Council selected its Preferred Alternative in October 2008, supplemental analyses of aspects of the Council's motion were required to complete the analysis for submission to the Secretary. These were reviewed by the Scientific and Statistical Committee, and accepted by the Council, in February 2009. The draft final analysis was submitted to NMFS in September 2009. Recommended revisions from informal reviews by NMFS, and additional revisions of the analyses of the 2008 Preferred Alternative that were requested by the Council, were incorporated into the draft submitted to the Secretary in July 2011. A proposed rule was published in July 2011 and comments were accepted through September 21, 2011.

In February 2012 the Council reviewed a report by NOAA Fisheries that included 1) requests for clarification of Council intent on its proposed CSP and 2) a summary of public comments. The Council requested additional information and requested that the analysis be revised to reflect its clarifications and to respond to public comments. Based on additional information provided by staffs of the Council, NOAA Fisheries, and ADF&G in April 2012, the Council adopted a new problem statement and revised its previous action (i.e., 2008 Preferred Alternative) by adopting a preliminary preferred alternative (PPA) (which was corrected in June 2012) and additional options for analysis. The Council scheduled a new final action for October 2012.

Alternative 3. (2012 Preliminary Preferred Alternative) Establish a catch sharing plan that includes sector accountability

Alternative 3 is the 2012 Preliminary Preferred Alternative for a modified CSP. In addition to the features identified under Alternative 2 (outlined above), Alternative 3 would replace the fixed matrix of management measures under Alternative 2 with a requirement that the Council recommend, and the IPHC adopt, annual management measures to maintain charter halibut harvests within the respective allocations. Alternative 3 differs from Alternative 2 in the following ways: 1) it adjusts the 2008 Preferred Alternative allocation by a) eliminating the $\pm 3.5\%$ target range around the allocations, and b) using logbooks with adjustments for crew harvests instead of the statewide harvest survey to estimating catch; 2) it clarifies features of the GAF program (see below); 3) it considers whether to recommend to the IPHC that GAF program implement separate accountability for commercial wastage and charter wastage.

In April 2012, the Council amended its previous action on the CSP (Alternative 2). It adopted the following changes that 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 Approach" 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 $\pm 3.5\%$.
- 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. The Council recommends using an adjustment factor based on the 5-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, as corrected in June 2012:

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 = $(15.1\% * 5.6\%) + 15.1\% = 15.9\%$

Area 3A adjustment factor = 11.6%

Area 3A current CSP allocation in Tier 1 = 15.4%

Adjusted CSP allocation = $(15.4\% * 11.6\%) + 15.4\% = 17.2\%$

Area 3A current CSP allocation in Tiers 2 through 4 = 14.0%

Adjusted CSP allocation = $(14.0\% * 11.6\%) + 14.0\% = 15.6\%$

- The Council recommends for consideration of a letter to the IPHC supporting the idea of separate accountability of wastage 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.
- Guided Angler Fish Program – all elements of the GAF Program under the 2008 preferred alternative would apply, except as noted below.
 - GAF would be issued 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 would be based on the previous year's data or most recent year without maximum size limit in effect.
 - The leasing limitation for each commercial halibut IFQ shareholder would be limited to 10% or 1,500 pounds of his or her IFQ holdings in Area 2C, and 15% or 1,500 pounds of his or her IFQ holdings in Area 3A, whichever is greater.
 - *Anglers*² would be required 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 review within five years of the start of the GAF program would be scheduled, which would take into account the economic effects on both sectors.

Alternative 4. Establish a catch sharing plan that includes sector accountability, with adjustment of 2008 PA by +3.5% on two lower levels of combined catch limits

Alternative 4 contains the same elements as Alternative 3, except it would increase the allocation to the charter sector by 3.5% of combined charter and commercial catch limit (CCL) at the two lower CCL levels; no adjustment is made to the highest CCL. In its April 2012 motion the Council labeled those as Option 1 (Area 2C) and Option 2 (Area 3A). The options represent the 2008 Preferred Alternative + 3.5% of the CCL.

Option 1: Area 2C

At a combined catch limit of <5 MIbs, 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 MIbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (18.6%). At combined catch limits of ≥9 MIbs, maintain the original target CSP allocation of 15.1%.

Option 2: Area 3A

At a combined catch limit of <10 MIbs, 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 MIbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (17.5%). At combined catch limits of ≥20 MIbs, maintain the original target CSP allocation of 14.0%.

Alternative 5. Establish a catch sharing plan that includes sector accountability, with adjustment of 2012 PPA by +3.5% on two lower levels of combined catch limits

Alternative 5 contains the same elements as Alternative 3, except it would increase the 2012 PPA by the same 3.5% of the CCL at lower CCL levels. They are labeled as Option 1 adjusted (Area 2C) and Option

² An interagency staff working group recommends that Council identify the guide or "skipper" as the responsible party for marking GAF. This language is consistent with a verbal correction to the motion that occurred during the April 2012 Council meeting, but was not incorporated into the written language that was adopted.

2 adjusted (Area 3A). These options apply a consistent approach to the 2012 PPA that was applied to the 2008 Preferred Alternative under Alternative 4. Their addition applies a consistent, logical approach to identifying the full range of allocation options and notices the public of potential action by the Council when it selects its Final Preferred Alternative in October 2012. The range of allocation options are listed in the tables below.

Option 1 adjusted: 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 (21.8%); at a combined catch limit of $\geq 5 - <9$ Mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (19.4%). At combined catch limits of ≥ 9 Mlbs, maintain the original target CSP allocation of 15.9%.

Option 2 adjusted: 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 (20.7%); at a combined catch limit of $\geq 10 - <20$ Mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (19.1%). At combined catch limits of ≥ 20 Mlbs, maintain the original target CSP allocation of 15.6%.

Note: Under the 2012 model, the $\pm 3.5\%$ 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.

Summary of Proposed Allocations: The result of the Council motion includes the following options to divide the available halibut in Area 2C (Table ES-2) and Area 3A (Table ES-3). The first option is the Council's 2008 preferred alternative. That option would allocate 17.3% of the Area 2C CCL to the charter sector when the CCL is less than 5 Mlbs. This percentage was originally derived as 125% of the 2001 through 2005 average charter harvest (GHL formula updated through 2005). The charter sector would be allocated 15.1% when the CCL is 5 Mlbs or greater. This percentage was originally derived based on the 2005 charter harvest. The 2012 PPA is the 2008 preferred alternative increased by 5.6% to account for using logbooks as the primary data collection mechanism. The third option, "Option 1 (unadjusted)", is the 2008 preferred alternative increased by 3.5% of the CCL. The 3.5% increase equates to the upper bound of the target range in the Council's 2008 preliminary preferred alternative. Finally, the fourth option "Option 1 (adjusted for allocation and logbooks)" is "Option 1 (unadjusted)" plus 3.5% of the CCL.

Effect of Alternatives

The proposed alternatives address allocation of the Pacific halibut resource between the commercial setline and charter sectors. While the alternatives would affect harvest levels and charter fishing practices, total halibut removals would not be affected as any decreases in charter harvests would result in increased commercial harvests. The IPHC factors estimated halibut removals into the halibut stock assessment when setting annual commercial longline catch limits. Therefore, none of the proposed alternatives is expected to significantly impact the halibut stock. None is expected to affect the physical environment, benthic community, marine mammals, seabirds, or non-specified groundfish species. The data are insufficient to quantify whether groundfish stocks may be affected by the alternatives, but any effects on groundfish from the proposed action are expected to be minor. There may be an effect on the human environment, as there are winners and losers under any sector allocation. The Council attempted to mitigate the impacts of the initial allocation on the charter sector by allowing charter limited entry permit holders to acquire additional allocation from the commercial sector, through financial compensation. Charter clients who fish with these permit holders would be allowed to fish under regulations similar to those for non-guided anglers.

Regulatory Impact Review

The economic impacts of the alternatives considered in this analysis are discussed in terms of the status quo (GHL) and the four CSP alternatives (Alternatives 2 through 5) that are being considered by the Council to replace the GHL. As noted in the October 2007 Scientific and Statistical Committee (SSC) report, this analysis does not provide quantitative estimates or confidence intervals for the magnitude of net national benefits. Nor are quantitative estimates provided for regional economic impacts of the alternatives considered in this amendment. Because those estimates cannot be provided, given the information available, the analysis does not identify an optimal allocation. Additional data that is currently unavailable would be needed to provide information on the contribution of each alternative to national welfare associated with all sources of commercial removals (e.g., setline retained catch and wastage, charter catches and release mortality, bycatch in other fisheries, etc.), as well as the effects these may have on users and uses of the resource not associated with commercial fishing activity, both market and non-market. Even if the Council were able to recommend an allocation that maximizes net benefits to the nation under the current conditions, changes that occur within sectors and regions would require frequent modifications to the allocations.

Alternative 1. Status quo (Guideline Harvest Level)

The GHL defines the amount of halibut allocated to the charter and commercial IFQ fisheries in Area 2C and Area 3A. Charter allocations are defined based on the Total CEY, which is the exploitable biomass multiplied by the exploitation rate. The charter harvest level is established in a step-wise fashion when the Total CEY is more than 4.779 Mlb in Area 2C. In Area 3A, the charter harvest level is defined when the Total CEY is more than 11.425 Mlb. If the Total CEY is less than those amounts, the GHL is not used to determine the charter allocation. When the Total CEY is more than 9.027 Mlb in Area 2C the charter harvest level is 1.432 Mlb and never increases; in Area 3A the charter limit is always set at 3.650 Mlb when the Total CEY is more than 21.581 Mlb.

Because the GHL is based on Total CEY the charter catch limit is not affected by other halibut removals. Removals for unguided sport, personal use, waste, and bycatch are deducted from the Total CEY after the GHL is set. Commercial IFQ catch limits are established after other removals have been deducted from the Total CEY and any adjustment to the catch limit have been made by the IPHC. As a result increases in other removals affect the commercial harvest, but not the charter GHL. Because other removals have tended to increase over time they have reduced the commercial IFQ allocation.

Area 2C The Area 2C GHL was reduced from 1.432 Mlb to 931,000 lb in 2008 and, subsequently, to 788,000 lb in 2009. The GHL remained at 2009 levels until 2012 when it was increased 931,000 Mlb. Management measures in have been more restrictive than the unguided sport bag limit since 2007. Those restrictions on charter angler harvest were insufficient to constrain charter harvest to the GHL until 2011. That year the 37 inch size limit on the one fish bag limit, in addition to weak economic conditions, resulted in the charter sector harvesting only an estimated 388,000 lbs of halibut. Based on early estimates of 2012 charter harvest, it also appears the charter sector will be within their GHL.

Area 3A The GHL was reduced from 3.650 Mlb (2004 through 2011) to 3.103 Mlb (2012) in Area 3A. A two-fish daily bag limit (of any size) has remained in place over the entire life of the GHL. The charter harvest permit program will also continue to be in place. Charter harvests are not expected to be constrained by the program, because of excess capacity in the fleet. Client demand in Area 3A is assumed not to change as a result of maintaining these management measures.

Economic conditions since 2008 appear to have reduced demand for trips to Alaska, halibut charter trips, and charter angler halibut harvests. The proportion of the decline in charter harvest attributed to economic conditions in Area 2C is not estimated, but are a result of changing management measures, general economic conditions faced by potential charter clients, and biological conditions that have occurred in the halibut biomass and halibut distribution over this time period. Changes in Area 3A harvest are more

directly related to changing economic conditions, since management measures affecting client welfare have been unchanged.

A limited entry program for Area 2C and Area 3A was implemented in January 2010; permits were required to be on board vessels in the charter halibut fishery beginning February 1, 2011. This program limits the number of vessels that may be used by guided fishermen at any time and limits the number of clients that may fish on a permitted vessel during a trip. Vessels are limited by requiring a charter harvest permit (CHP) be onboard a vessel when it is used for a halibut charter trip. There are 582 charter permits for Area 2C. The majority of these permits are issued for use by "traditional" charter business operators (537 permits or 92.3%). All but one of the remaining permits is issued to CQEs. In Area 3A, 503 permits are currently available to provide halibut charter trips. Those permits are primarily held by traditional charter operators (441 or 87.7%). Fifty-six of the remaining permits are held by CQEs and six by military entities. The number of outstanding permits may be reduced slightly over time as the remaining permits that are under dispute are ruled on.

The status quo is not expected to alter the future harvest of halibut. However, the annual management measures implemented under the status quo to limit the charter sector to their GHL will cause catch to vary over time. Worldwide economic conditions will also impact halibut removals by the charter fishery. The number of eligible participants in the fishery is determined by the charter permit program and will be the same under all the alternatives under consideration.

Alternative 2. Catch Sharing Plan

Alternative 2 mirrors the Preferred Alternative that was selected by the Council in 2008, but never approved by the SOC or implemented by NOAA Fisheries. A catch sharing plan would divide a combined commercial and charter catch limit, determined by the IPHC for Areas 2C and 3A independently, between the charter and commercial setline halibut fisheries. The allocation would divide the catch limit such that in Area 2C the charter sector would be allocated 17.3% of the combined catch limit, using estimates for 2012. That equates to a charter catch limit of about 600,000 lbs, or a decrease of about 310,000 lbs relative to the GHL. The impact of that decline on the charter sector will depend on the difference in management measures that must be imposed to constrain the charter sector to their catch limit. Those management measures will affect client demand for trips. The decrease in value associated with decrease in clients will determine the change benefits obtained by charter operators. More restrictive charter client bag limits, are expected to reduce consumer surplus, but the amount cannot be quantified with existing information. Processors of charter caught fish and suppliers of goods and services to charter operators will also be negatively impacted as the charter operator's demand for those services declines. Crew members may also realize a reduction in pay and tips as a result of fewer trips. Communities that are more reliant on charter businesses than halibut IFQ harvest/landings could also realize a decline in community impacts, both in terms of expenditures within the community and taxes generated. However, most communities are dependent on both the commercial IFQ and charter fisheries, so negative impacts realized by on sector will be offset, to some extent, by increased activity from the other sector.

Management measures will be implemented based on the matrix structure that selects the management measures based on the CCL. The rigid structure of the matrix provides no discretion for managers to select an alternative management measure other than those dictated by the matrix regardless of whether harvests under that alternative measure better achieve the target allocation and have less of a negative effect on charter bookings. Managers and the charter industry have limited experience with the measures included in the matrix. As a result, it is possible that the expected effects of those measures (both in terms of harvests and the effects on the charter sector) may prove inaccurate. In addition, with changing halibut stocks, it is possible that the effects could vary over time. While the matrix is responsive to changes in projected harvests under the default measure, that response is limited to selecting a single back up management measure. By limiting the response to an inadequate default measure, or to the selection of a single back up measure, the matrix provides very little flexibility to respond to new information. The

charter industry has recently suggested a number of unused measures intended to constrain their harvests while minimizing the negative effects on charter demand. The matrix provides no opportunity for consideration of these measures, which may prove far more effective in both addressing the need to constrain harvests of the charter sector and mitigate the negative effects of those constraining measures on the charter industry.

Guided anglers must abide by any possession limits, bag limits, and/or size limits that are in place for the charter sector in an area when harvesting from the common pool. GAF, leased from the commercial sector, may allow CHP holders to offer their clients the opportunity to harvest halibut under the same regulations (when more liberal) that apply to unguided anglers. Any such halibut, harvested outside of the charter fishery regulations, must be identified as GAF (or will be subject to an enforcement action). GAF will not be counted against the common pool harvest, because a member of the commercial sector is compensated to allow the charter harvest to increase by reducing their personal allocation. Because the commercial sector is compensated for the halibut, the catch is deducted from the commercial allocation. GAF may provide a market mechanism to transfer QS from the commercial to the charter sector if the halibut is of greater value to charter clients. Because very limited information is available on the willingness of clients to pay an additional fee for GAF, estimates are not provided on the amount of GAF that would be leased or the prices associated with transfers that would result.

Alternatives 3 through 5. Catch Sharing Plan

The preliminary preferred alternative (Alternative 3) and Alternatives 4 and 5 have the same structure and component, but the sector allocations differ. Based on these alternatives and 2012 data the Area 2C charter catch limit would have been reduced from 931,000 lb under the GHL in 2012 to 633,000 lb under the 2012 PPA (Alternative 3), 720,000 lb under Option 1 (Alternative 4), and 754,000 lb under Option 1 adjusted (Alternative 5). Relative to the GHL the charter catch limit would have been decreased by 298,000 lb under the 2012 PPA, 211,000 lb under Option 1, and 177,000 lb under Option 1 adjusted. That fish would have been directly reallocated to the commercial sector. Based on the average Area 2C exvessel price, from 2011, of \$5.52/lb, those gains equate to an increase in IFQ holder exvessel revenue of about \$977,000 to \$1.16 million – depending on the option selected. The Area 3A charter catch limit would have been reduced from 3.103 Mlbs under the GHL in 2012 to 2.343 Mlbs under the 2012 PPA (Alternative 3), 2.629 Mlbs under Option 2 (Alternative 4), and 2.869 Mlbs under Option 2 adjusted (Alternative 5). Relative to the GHL the charter catch limit would have been decreased by 758,000 lb under the 2012 PPA, 474,000 lb under Option 2, and 234,000 lb under Option 2 adjusted. That fish would have been directly reallocated to the commercial sector. Using the average Area 3A exvessel price of \$5.43/lb from 2011, those gross exvessel revenue equate to an increase in IFQ holder exvessel revenue of about \$1.3 million to \$4.1 million, depending on the option.

These estimates represent only gross ex vessel revenues, a portion of which would be distributed to vessel owners, crews, and support industries. In addition, processors of those fish, processor support industries, consumers of commercially harvested halibut, and communities that receive fish tax revenue from the landings would also benefit from this redistribution of allocations. Losses to the charter sector would also arise, but those losses may not be as proportionately related to the pounds of halibut lost in 2012. Charter revenue is determined by client demand for halibut charter trips. Client demand is related to their expectations of the trip attributes and general economic conditions. As charter catch limits affects the management measures (by altering the bag limits and size limits), it changes the client's expectations of the trip. When expectations are decreased to a point the client is no longer willing to take the trip, or will only take the trip at a reduced price, demand is decreased. That decrease in demand reduces the charter operator's gross revenue and likely net revenue. Revenue decrease affects their charter industry suppliers, processors of charter caught halibut, charter crewmembers, other businesses in the community that provide goods and services to clients, and consumer's surplus (the benefit charter clients obtain from the trip). Estimating the loss to the charter operator, let alone all the other sectors, is complex. Those losses

may more than offset the gains to the commercial sector, but because of the limited information available and the assumptions that would be required, those estimates are not generated.

The \pm 3.5% harvest allowance would be excluded from these options. The SSC has commented that the range is too narrow to meet the stated objective of accounting for management error. If the provision is retained the Council should consider developing a stronger rationale for its inclusion.

These alternatives also contain three modifications to the GAF program.

- Include a requirement for skippers to mark GAF by removing the tips of the upper and lower lobes of the tail and report the length of the retained GAF halibut to NMFS through the NMFS approved electronic reporting system.

It is critical that enforcement officers can easily distinguish GAF from fish harvested under the charter bag limit. Marking each GAF by removing the upper and lower lobes of the tail allow anyone on the vessel to distinguish GAF fish from other halibut that were caught. It is the responsibility of the skipper to ensure that the GAF fish are properly marked. Failure to properly mark GAF will result in the skipper being subject to appropriate enforcement action, as determined by the actual circumstances of the violation.

- A complete review within five years of the start of the GAF program, taking into account the economic effects of both sectors

This provision implements a timeline for the Council to conduct a review of the GAF program. The review must be completed within five years of the start of the program so four or fewer years of data will be available for the study. NMFS will collect data from GAF transfers to the charter sector and any GAF that is returned to the commercial IFQ fishery on November 1. NMFS will also collect data on GAF transfer prices. That information will be the primary source of quantitative economic data available for the review. Data on the overall harvest and bag limits in place during the first years of the program will also be available. These data, along with qualitative information collected from participants in the fishery will likely form the bulk of this analysis. At this time the charter industry has not been requested to report trip revenues or how clients will compensate charter operators for the use of GAF. Unless that information is collected, the analysis will provide only a qualitative discussion.

- An increase in the Area 3A IFQ lease limits from 1,500 lbs or 10% of IFQ issued (whichever is greater) to 1,500 lbs or 15% of IFQ issued (whichever is greater).

Increasing the percentage of IFQ that holders of more than 10,000 lbs of IFQ in Area 3A may lease, results in about 300,000 lbs of addition IFQ being available as GAF. Whether these additional fish are needed will ultimately depend on charter client's demand for GAF and charter operator's willingness to participate in the program. Insufficient information is currently available to determine demand for GAF.

Alternatives 3 through 5 contain a provision where the Council could request the IPHC to implement a separate accountability provision for commercial and charter wastage of O26 inch halibut. During full down years, implementing SA results in gains/losses of equal magnitude but opposite sign being realized by the charter and commercial fleet. The sector that increases their catch limit had a smaller ratio of waste to allocation percentage than the other sector. When a slow up year occurs, it is possible that the SUFD adjustment changes the combined limit sufficiently that both sector's allocation is increased. This would have occurred in Area 2C during 2012.

Finally, the analysis of each of the CSP alternatives provides information on a potential method to eliminate the vertical drop in the charter allocation when the percentage of the CCL is adjusted. The methodology used in the analysis would remove the charter allocation drop by holding the charter allocation steady, at a fixed poundage, until the CCL increases to the point the charter allocation does not decline.

Economic Impacts of the Alternatives

For the proposed alternatives, the analysis assumes that the charter sector allocations would be a common pool of fish that clients of CHP holders would be allowed to harvest. Bag limits, seasons, and other management measures would be set pre-season to achieve the allocation, and there would be no inseason harvest monitoring (of common pool fish), other than the current logbook program or other monitoring methods required by NMFS. Adjustments to the bag limits and size limits would be made for the next fishing season, so that the common pool allocation would not be exceeded. The leasing of commercial IFQ also would be allowed. Leasing of IFQs allows individual CHP holders that hold GAF to use those fish for clients to exceed charter harvest bag and size limits (up to those limits in place for the unguided angler).

Quantitative estimates or confidence intervals for the magnitude of net national benefits under each alternative are unavailable. Determining which allocation would maximize net national benefits would require detailed information on costs and expenditures in both the commercial and charter sectors. In addition to cost information, demand for charter trips and angler willingness-to-pay for trips would also be required. Even if these data were available and current, changes in the halibut biomass will impact the optimal sustainable yield and the optimal allocation of halibut. Because of these ongoing changes to the resource, any allocation that is optimal when it is made (if the Council felt an "optimal" allocation was appropriate) likely would be suboptimal in the future. Leasing IFQ from the commercial sector in the form of GAF could adjust the amount of halibut available to charter clients and benefit both the commercial and charter sector. The benefits of the leasing provision for the charter sector will depend on the bag limits in place for charter and unguided anglers, availability of IFQ for lease, and the market price for those IFQs. The leasing of IFQs would tend to benefit both sectors if IFQs are available, and clients are willing to incur higher costs for a trip to harvest an additional halibut (under a one-fish bag limit, for example). Stakeholders from the commercial and charter sectors have testified in support of the proposed GAF Program, as a market-based mechanism for attaining a more nearly optimal allocation.

Quantitative estimates of regional economic impacts and their distribution, accruing from the proposed alternatives, are also unavailable. Nonetheless, this analysis recognizes and attempts to reflect, to the fullest extent practicable, the contributions that commercial fixed-gear halibut fishing and charter halibut fishing make to local and regional economic and social welfare and stability.

Charter Sector

The charter sector is comprised of business operators who are licensed by the State of Alaska to provide charter trips. The alternatives assume that charter operators must hold a CHP to legally operate in the fishery. It is not presently possible to provide the charter sector's net revenue, but estimates over a range of trip prices and clients are provided.

If management measures restrict charter harvests to its allocation, increased demand for charter trips would be offset by those more restrictive measures. In this case, increases in demand for charter trips would not be expected to directly impact the commercial sector, unless the shortage of charter seats induced a large increase in "unguided" effort. The commercial sector would be impacted if the charter sector were not constrained to its allocation or if the growth in demand for charter services by the public results in the Council recommending, and the Secretary of Commerce increasing that sector's allocation. It is also possible the commercial sector could petition the Council in the future to modify the charter allocation (although this is not the Council's intent).

The preferred alternative also would allow charter LEP holders to lease GAF from the commercial sector. It is not possible to predict the quantity of IFQs that would be available for transfer each year. However, both the charter operator and the commercial IFQ holder must be willing parties for IFQs to be leased and converted into GAFs (i.e., the charter operator must pay a sufficient amount for the IFQs to compensate the commercial QS holder for forgone net revenues) (Criddle 2006a).

Charter LEP holders who lease IFQs from the commercial sector would realize increased costs. Those costs would be passed on, in whole or in part, to charter clients, through higher trip prices. The increased costs and prices are expected to allow charter LEP holders to earn normal profits in the long run.

Commercial Halibut Fishery

Impacts of moderate fluctuations in stock abundance would lead to changes in the commercial quota under either a fixed or a percentage based charter allocation. Changes in the amount of halibut harvested by the commercial sector could impact ex-vessel prices, commercial net revenue, and post-harvest surplus. Given research conducted by Herrmann et al. (1999) on the price flexibility of Alaska halibut, the changes in ex-vessel price that result from increasing or decreasing the amount of commercial harvest in Areas 2C and 3A are expected to be very small under the preferred alternative. An allocation to the charter sector that decreases the commercial allocation is expected to result in a small increase in ex-vessel price, but an overall decline in the net revenue of commercial harvesters. Post-harvest surplus is directly related to the quantity of halibut on the market, so a decrease in commercial harvests would lead to a decrease in post-harvest surplus (Criddle 2006b), *ceteris paribus*. If the allocation to the charter sector is set at a level that reduces its harvest during periods when the combined catch limit is steady, the commercial harvest would be increased and post-harvest surplus would increase. Criddle 2006b also provides a summary of how to conduct an analysis that would determine the net benefits to the commercial and charter sector under various allocations. While the analysis provides a description of how the analysis should be conducted, it does not provide a solution to the optimal allocation between the charter and commercial sectors. The data needed to complete that analysis are not available and economic changes that occur would alter the optimal allocation.

Halibut stock fluctuations may impact the asset value of QS held by commercial harvesters. If the changes to halibut stocks in Areas 2C and 3A occur frequently and are relatively small, they are not expected to impact QS values. However, if the stock size is expected to increase or decrease for a longer period of time, it would impact QS asset values. In that situation, a decrease in stock size would reduce QS values and an increase in stock size would increase QS values. Redistributing the amount of halibut that is assigned to the commercial sector could have a similar impact on QS values.

Because commercial QS are expected to generate lower net revenues over the next six years (based on IPHC CEY projections), the asset value of Area 2C QS is also expected to decline.³ Persons that sell their QS could expect to receive less compensation. Shares would be acquired by "eligible" persons who believe stock abundance will increase over the longer-term. As a result, Area 2C QS holdings could be further concentrated (up to use caps). For QS holders that stay in the fishery, constraints on charter harvest growth would help preserve their portion of the combined catch limit.

The Area 2C commercial allocation is projected to be smaller (during the years considered in this amendment) under the fixed poundage allocations, relative to the percentage based allocations. This is because the projected CEY is smaller during those years, relative to the base years used to determine the allocations. Because the preferred alternative is a percentage based option, it is expected to allocate more halibut to the commercial sector than the fixed poundage options considered.

Because the commercial allocations in Area 3A are projected to be at or above historical levels in the near future, the QS values are not expected to change dramatically as a result of near-term declines in net revenue. If the trend of higher than historical average allocations is realized, the QS values may increase.

Increased demand for charter trips does not affect participants in the commercial fishery when expansion of the charter sector is constrained (Criddle 2006b). The proposed harvest restrictions are assumed to constrain the amount of halibut the charter sector can harvest to its heir allocation, so the commercial allocation would not be reduced to accommodate increased charter harvests. It is also important to note

³ If demand for charter trips is greater than the supply in Area 2C, the use of GAF may help stabilize both sectors.

that unless there are conservation concerns, charter overages would have a minor impact on future combined catch limits.

The commercial sector, however, would have been directly impacted by a charter allocation that is larger than the charter sector would harvest under the status quo. That scenario would allow the charter sector to increase its harvest, as client demand increases, until it reaches the allocation. From that point forward, the allocation would constrain the charter client harvests and the commercial sector would not be impacted by further increases in charter demand.

If some amount of halibut allocated to charter anglers are unused and is not reassigned to the commercial sector, that excess allocation to the charter sector would reduce the commercial allocation more than is necessary. Forgoing that harvest would reduce post-harvest surplus in that year. There may be off-setting "gains" to be had in the future, as halibut not removed through either charter or commercial fisheries, continue to grow, reproduce, and contribute to the halibut biomass. Determining the net effect of growth and reproductive rates, natural mortality rates, market demand for halibut, charter demand for halibut trips, and the appropriate discount rate(s), among other consideration, exceed current data and analytical capabilities. Nonetheless, these issues counsel care in drawing conclusions about "net benefits".

Leasing of GAF would allow commercial QS holders to transfer IFQ to the charter sector. Theory suggests that the commercial sector would only be expected to lease IFQ to the charter sector if they receive sufficient compensation to offset the net revenue they would expect to derive from harvesting the fish themselves.⁴ Because individual commercial harvesters generate different amounts of net revenue from their allocation, the commercial operations that generate the lowest marginal net revenue would be most likely to lease halibut, all else equal. Charter operations that have the highest net revenue per fish are expected to be the most willing buyers, if their net "benefit" per fish is greater than or equal to the lease cost per fish. It is possible that an operator could "lose" money on a GAF, but would only knowingly do so in order to "benefit" in other than net revenue terms (e.g., "client good will", advertising "loss leader", etc.). Leases are only projected to provide additional harvesting opportunities for charter anglers in Area 2C, through 2015, so in the short term the leasing of GAF is not anticipated to have a substantial impact in Area 3A.

Charter Clients

Charter trips hired by clients would not be constrained by the amount of halibut available to its sector in-season under the status quo or the proposed alternatives. However, demand for charter trips could decline, as more restrictive management measures are imposed (e.g., a one-fish bag limit in Area 2C) to keep the sector's harvest within its proposed allocation. Demand for trips could also decline as a result of weak economic conditions. Because excess capacity is expected to continue under the proposed CHP program, at least in the short term, a charter client would be expected to pay a price for a trip that would allow the "average" charter operator to earn normal profits (NPFMC 2006a).⁵

Status quo regulations are expected to be more restrictive in Area 2C, than in Area 3A. The continuation of current regulations was assumed in both areas (including a one-fish bag limit and possession limit of two daily bag limits in Area 2C). Those management measures are expected to reduce both consumer demand and consumer surplus, relative to regulations in place for Area 3A. Area 3A charter clients would remain under a two-fish bag limit and a possession limit of four fish. The numbers of halibut that may be harvested by a client during the year are not further restricted. Because of the different management measures assumed to be in place for the two areas, clients may choose to take a trip in Area 3A, instead of

⁴ The implicit assumption here is that anonymous actors in a competitive marketplace make individual, economically rational decisions concerning trade; however, in the real-world, sector conflicts, inter- and intra-community stressors, and personal animosities (alliances) will undoubtedly influence the relative "efficiency" of this market.

⁵ With surplus capacity and declining demand, the marginal operator will see all rents dissipated. Over time, all else equal, these conditions will drive excess capacity out of the sector.

Area 2C. This behavior would shift demand from Area 2C to Area 3A. If non-residents increase the percentage of trips they take in Area 3A, it may increase overall consumer surplus, relative to what it would be if participation patterns remained static. A variety of attributes associated with Area 2C clientele make a sweeping transfer of demand "unlikely."⁶

Differential trip pricing would, almost certainly, result if clients wanted to use GAF to relax their harvest restrictions. For example, if a client wanted to harvest two fish of any size in Area 2C, the client may need to compensate the charter operator for the additional cost associated with the lease of the required GAF. It is not possible to know how CHP holders would develop price structures for various types of trips. However, the use of GAF would increase trip costs and those costs are expected to be passed on to the client.

The CHP is assumed to not constrain clients booking a charter halibut trip. Competition for clients is expected to keep trip prices at a level that would, on average, allow CHP holders to only earn normal profits. All else being equal, the price of trips should not increase as a result of the common pool management measures. Trip prices would increase only for those clients that use GAF to increase the bag limit, if individuals are charged for the use of GAF. Seasonal discounts may continue to be offered, especially in Area 3A, as CHP holders attempt to attract clients during the non-peak seasons. Discounted trips have historically been available before mid-June and after mid-August. Discounted trips were widespread in 2009, presumably, owing to the worldwide economic downturn.

Halibut Processors

Halibut processors process both commercial and charter harvest. Processors may generate income from both sources or specialize in one or the other. Commercial halibut processors produce a variety of product forms and sell to a variety of markets. Representatives of the commercial sector have indicated that processors may receive from \$1.35 to \$2.00 per pound for "value added" custom processing of halibut (e.g., filleting, packaging, freezing). The analysis assumed \$1.75 per pound. They also indicated that halibut is important, because it helps keep product flowing through the plants when other fisheries are closed or deliveries are slow. Without a sufficient supply of halibut, processors may find it difficult to keep plants open as many days as they are currently.

Processors of sport-caught halibut provide a service to sport fishermen. They typically portion, package, and freeze halibut for a fee of \$1.00 to \$1.75 per pound, incoming weight. Halibut is also an important part of their income, especially in areas that have a large sportfishing presence.

Consumers of Commercial Halibut

Decreases in the amount of halibut available to consumers would result in increases in halibut prices, all else being equal. As stated earlier, increases in ex-vessel price as a result of decreased supply are expected to be modest, given the price-flexibility of halibut. Even though price increases are expected to be relatively small, the combination of increased prices and reduced availability could decrease post-harvest surplus (Criddle 2006a). The decrease in post-harvest surplus cannot be estimated for the various common pool allocation options. However, the options that generate the smallest charter allocation would result in the largest post-harvest surpluses accruing to consumers of commercially caught halibut, *ceteris paribus*. Alternatively, allowing the charter sector to lease commercial IFQ would, all else being equal, reduce the amount of halibut delivered to the commercial market, thus, reducing consumer surplus accruing to these consumers, if transfers occur. The actual impact on consumers will depend on the

⁶ A very substantial portion of those utilizing charter halibut fishing services in Area 2C are passengers aboard cruise ships, traversing the inside-passage. Halibut fishing is one, among many, possible "supplemental activities" they may choose during port-calls (i.e., charter halibut fishing is unlikely their primary purpose for the trip). These "inside-passage" cruises generally do not call on ports in Area 3A, effectively precluding easy transference of charter demand by these individuals during their cruise.

amount of halibut in the market from other areas of Alaska and Canada, in addition to the substitution effects of other species.

Communities

Economic activity resulting from the charter and commercial halibut fisheries generates income for residents of the communities where the economic activity occurs. Employment is also created in communities that provide goods and services to the fishing sectors.

The regional economic impacts under the status quo would likely differ from those under an allocation to the charter sector that imposes additional management constraints in future years. However, changes in regional economic impacts are not reflected in net national benefits.

Under the status quo, ignoring for the present the effects of the recent global economic contraction, the contribution to personal income and employment attributable to the charter sector is expected to increase in Area 3A, in the long-run. In Area 2C, the sector would experience declines in the short-term, as a result of stricter management measures imposed to keep the sector within its GHM (one-fish bag limit). If the CEY increases to higher levels in the future, the charter sector would be expected to increase its contribution to personal income and employment, above the 2009 levels.

No options are being considered that would further limit the harvest of the charter sector within a fishing season, once the season's allocation is established. However, the one-fish bag limit in Area 2C will likely reduce client demand for trips in all Area 2C communities. When the number of trips taken is reduced, the charter sector would need fewer input supplies (e.g., bait, fuel) and it would reduce expenditures within the communities that supply those inputs. When they purchase fewer goods and services within the community, it has a negative impact on that economy, if the reductions are not offset by increased purchases by other sectors (e.g., commercial halibut fishermen).

The allocations considered here would shift the respective amounts of halibut available to the commercial sector and charter sectors. The overall near-term CEY reductions are likely to have a larger impact on the Area 2C regional economies, than shifting the available halibut among sectors. However, shifts in the commercial/charter allocations would impact individuals and/or individual businesses within those communities more intensively than it would the aggregate regional economy, because spending by the two sectors would, to some extent, offset each other. However, because the port-of-origin and the composition of consumable inputs of the two sectors are not precisely equivalent, there will be "winners" and "losers" among and within communities. The attributable reduction in trips, by halibut fishing sector, by community, cannot be estimated, given available data. Information on the expenditures, by halibut fishing sector, by community, is also unavailable.

Rural communities that can take advantage of the more liberal CQE quota leasing provisions could benefit from the preferred alternative. Residents of communities associated with a CQE would have more flexibility in moving halibut from the commercial sector to the charter sector and vice versa. This is because IFQ held by CQEs are not limited by the 1,500 lb or 10 percent leasing restrictions that are placed upon other entities that hold QS.

Unguided anglers and subsistence harvesters

Continuation of the status quo is not expected to directly impose costs or provide additional benefits to unguided anglers, nor to personal-use or subsistence harvesters. Because halibut removals by these groups are deducted from the CEY, prior to determination of the catch limit, the amount of halibut harvested by the commercial and charter sectors does not impact the halibut available to these groups.

Any change in costs would be related to the charter operations increased fishing radius or commercial operations decreasing their fishing radius from coastal towns seaward as they deplete the more accessible fishing grounds or attempt to reduce fishing costs. This forces resident sport and subsistence fishermen to

travel farther in search of halibut, which increases fuel costs, heightens the risk of fishing in more exposed areas of the ocean, and potentially increases the number of trips needed to find halibut.

Imposing a limit on the amount of halibut that charter clients may harvest could result in some individuals that have access to a private boat fishing for halibut without a guide, when they would have used a guide service, all else being equal. Public comments for this action and prior Council actions pertaining to charter halibut fishing have included concerns about an increase in unguided or "bareboat" rentals. "Bareboat" rental companies provide vessels without crew, for the private uses of their clients. They do supply other equipment required for a successful fishing trip, such as maps, GPS locators, and fishing equipment. Public comment raised both safety and enforcement concerns about the effect of these businesses. The safety concerns focus on inexperienced boaters navigating in Alaska's challenging marine environment. Enforcement concerns have focused on the suggestion that some businesses would claim that a boat rental is unguided, but then provide a guide who would not identify himself as such, if intercepted by enforcement staff. The NOAA Office of Law Enforcement and the USCG has informed the Council that they do not have concerns under the preferred alternative about boater safety. They will continue to enforce the current regulations regarding boater safety, and those regulations are anticipated to provide adequate protections. If problems do occur in the future, the USCG will bring those issues to the Council's attention and they can be addressed through the Council processor or through USCG regulations

ERRATA (starting on p. 216)

2.5.12.7 Provision E – Conversion of GAF back to IFQ

Conversion of GAF back to commercial sector

1. *GAF holders may request NMFS convert unused GAF into IFQ pounds for harvest by the owner of the Quota Share in compliance with commercial fishing regulations.*
2. *Unused GAF may revert back to pounds of IFQ and be subject to the underage provisions applicable to their underlying commercial QS*

Option a: automatically on October 1 of each year; or

Option b: upon the request of the GAF holder, if such request is made to NMFS in writing prior to October 1 of each year.

3. (Preferred Alternative) *Unused GAF may revert back to pounds of IFQ and be subject to the underage provisions applicable to their underlying commercial QS either automatically on November 1 of each year. ~~or upon the request of the GAF holder, if such request is made to NMFS in writing prior to November 1 of each year.~~*

Component 1 would allow dual-holders of both IFQs and LEPs to convert GAF back into IFQ at any time during the commercial IFQ season. For example, at the beginning of the charter fishing season, a dual holder of commercial QS and charter LEP may request that NMFS convert IFQ equivalent to 200 GAF. In September, the dual holder realizes that he or she is only going to use 150 of the 200 GAF and asks NMFS to convert the remaining 50 GAF back into IFQ, using the same conversion ratios used during the original conversion. The holder is now free to commercially fish that IFQ. The intent of this component is to allow the dual holder to convert his or her own IFQ into GAF and retain the flexibility to convert those GAF back into IFQ.

Component 2 allows unused GAF to revert back to IFQ at the end of the commercial season, and to be subject to the underage provisions applicable to their underlying commercial QS. For example, a CHP holder not qualified to hold QS, leases IFQ and requests that NFMS convert it into GAF, which results in 200 GAF. By the end of the season, the CHP holder has used only 150 GAF. The unused 50 GAF *automatically* reverts to IFQ in the account from which it was leased.

Under Component 2, the Council's motion establishes two non-mutually exclusive options for converting GAF back to IFQ. Option A establishes an automatic reversion date for unused GAF, of October 1, while Option B allows for reversion prior to October 1, if the GAF holder makes the request to RAM. These options address RAM suggestions received for the April 2008 draft of this document. The staff suggested that reversion transfers could be conducted automatically, or only upon request. A full description of the re-conversion mechanism is contained in Section **Error! Reference source not found.** The primary reason for establishing an automatic reversion date was to avoid a conflict between GAF to IFQ reversions and the end-of-season balancing the accounts for commercial halibut, sablefish, and crab IFQ and preparation of IFQ permits for the following seasons which is conducted by the RAM Program at the end of each year. The October 1 date is the earliest date that avoids the conflicts RAM staff is concerned about AND minimizes effects on the charter fleet as a whole. ADF&G data for 2006 indicate that less than 1 percent of charter halibut harvest occurred after September 30, in either Area 2C or Area 3A. Hence, an automatic reconversion date for unused GAF of October 1 would not significantly affect charter business operations in aggregate. However, individual businesses may be affected by any automatic reconversion date. At the same time, the automatic date makes the program easier for RAM staff to manage. It would also provide six weeks for those (reverted) commercial IFQs to be used in the commercial sector.

Under Component 3 (preferred alternative), the Council selected its preference for converting GAF back to the commercial sector as IFQ. That alternative states that all unused GAF will revert to the QS holder that leased the GAF to the charter operator on November 1. ~~GAF may be transferred back to the person they leased the IFQ from, prior to November 1 if the GAF holders make the transfer request in writing to RAM.~~

Provision E would allow GAFs to revert back to the commercial sector at the written request of the GAF holder. The Council did not stipulate that commercial QS holders that leased IFQ to the charter sector could refuse to take the IFQ back. Because the GAF is returned at the request of the charter operator, if the IFQ holder is concerned about getting the IFQ returned during the season, they would need to structure terms of the reversion in the private lease contract. In that contract, they could specify the terms and conditions of reimbursement that the CHP holder would receive for returning GAF. Each contract could be structured to ensure that the buyer and seller agree to terms of the reversion. The proposed rule would address this issue in more detail, but such agreements would not be regulated or adjudicated by NMFS. Had the Council not selected Provision E, then there would be no reversion provision and the lease agreements would become a temporary, one-way transfer that would expire at the end of the calendar year. The Council's 2008 Preferred Alternative identified November 1 as the date by which all unused GAF automatically would revert to the commercial IFQ holder. Without specific language regarding compensation in the contracts, charter operators could lose the value of the GAF that is returned. Because the return of the IFQ is automatic and required in regulation, the charter operators may not have sufficient bargaining power to leverage a "fair" price for returned GAF, but since the reversion is after the typical charter season, it is likely that the automatic reversion will have little effect on the price. ~~Unused GAF also may be returned to the IFQ holder prior to November 1, if the GAF holder submits a written request.~~ Earlier reversions are likely to be negotiated and will depend on the added convenience of the early reversion to the commercial fisherman that may harvest the reverted IFQ. The Council did not stipulate any circumstance wherein the IFQ holder can request the GAF revert to IFQ.

The Area 2C charter anglers are assumed to be limited to a one-fish bag limit in the near term. This limitation would allow clients of charter CHP holders who use GAFs to return to historical daily bag limits, (presumably) for a fee, in Area 2C. GAF would not be expected to be used in Area 3A, until regulations are more restrictive on charter anglers than on non-guided anglers.¹

Because clients must book a trip with an CHP holder that holds GAF if they wish to fish under restrictions in place for unguided anglers, and they must be willing to incur any additional expense of using GAF that the CHP is able to pass along, only a subset of the client population would benefit from the program. Charter anglers who are unable to book a trip with a CHP holder that has GAF available, or are unwilling to incur additional fishing costs, would continue to be bound by the lower bag limit. Those anglers would not derive any benefit from the GAF program.

If a CHP holder has GAF they do not need, they may return the IFQ to the commercial IFQ holder from whom it was leased based on the above provisions. The pounds of IFQ returned would be calculated by multiplying the number of GAF by the average halibut weight used when the GAF were created. The commercial IFQ holder would then have the option of leasing the IFQ to another CHP holder or harvesting the IFQ himself or herself.

¹ The area allocations determine the management measures in place for the year. When management measures are set, based on the 2012 model, CHP holders will know if GAF could be used that year to increase clients harvest opportunities.

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-1(a,b) Halibut Management

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
X1	Paul Clappitt	Augustine Fisheries FVQA
X2	BRUCE GABRYS	COMMERCIAL FISHERMAN
X3	DENNIS GUBMUNDSON	Commercial Fisherman Homer
X4	MARK SALOS	" SKAGWAY
X5	LUDWIGTERMANN	COMMERCIAL KODIAK
X6	SEAN MARTIN	CHARTER HOMER
X7	Bob Alvarez / Seck Knutson	FVQA - Seattle
X8	ANDY MEZTAN / TIM EVERS	SEWARD CHARTERBOAT ASSOC DEEP OCEAN CHARTERBOAT ASSOC
X9	STEVEN ZERNIA	POTTER-N-SEA
X10	NIKLAS BAUTA	Self
X11	ELLEN ZERNIA	CADAW JAMES SEAWALK
X12	CART HUGHES	
X13	GARY AULT	Homer charter Association
X14	Donny Muland, NO. 9	Self need to testify Thurs
X15	KATHY PEASEY	ANN LOUISE
X16	John Eaker	SELF
X17	Ed Stumpff	P. COOPERIAK adventures
X18	Carter Hughes	self - Sitka AK
X19	ED WOOD	Self POTOMACK AK
20	Bonnie Millard	self (need to testify Thurs)
X21	Mel Ericsson	
X22	John Maline	IN + OUT CHARTERBOAT
(23)	Keith Maternack	Self
X24	Nate Smith	Self
X25	James Swift	"

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-1(a,b) Halibut Management

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Doyce DAVIS	Self / Halibut Coalition
2	LOREL HANSON	THE BOAT COMPANY
3	Julianne Curry	Petersburg vessel, owner
4	Heath Hilyard	Southeast Alaska Guides org.
5	Ludy Gease	Konai River Sport Fishing Assoc.
6	Frank Wright	Hoonah Indian Assoc
7	JEFF FARVOUR	Commercial fishermen
8	Frankie Belovich	"
9	Tom Ohaws	Charter Operator
10	Bob Linville	Longliner/self
11	Jim Boddling	Longliner
12	KIRIL Z. Basargin	K-BAY
13	Roland Maw	UCISA
14	STEVEN PEAVEY	CRAIG
(15)	Aimee Castle	self
16	Scott Frost	Quarterdeck Charters
17	GREG SUTTER	ALASKA CHARTER ASSOC.
18	JOHN BAKER	CHARTER OPERATOR
19	DANIEL DONICHA	" "
(20)	BRYAN BONDIOLI / melgrave	" "
21	Bill Lindow	self commercial fisherman
22	Russell Thomas	Clower Pass Resort
23	David Martin	self
24	Kathy Hansen	SEAPA
25	Jeff Stephan	UFMA

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PUBLIC TESTIMONY SIGN-UP SHEET

page 3

Agenda Item: C-1 (a,b) Halibut Management

NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1 PEBBY PARKER	HALIBUT ASSOC. of No Am.
2 FRANK BALOVICH	Self - Sitka Longliner
3 TAMMY SHRADER	Thursday Only
4 DAN FALVEY	
5 LINDA BEHUKEN	ALFA
6 JEFF WEDCKIND	SELF
7 TORI CONNOR	Self 2C IFO owner, Cape Reliant Fisheries Inc.
8 TOM GEMMELL	Halibut Coalition
9 NICK HOLCUMB	(Pending birth of baby)
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20	/melgrove
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25	

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C-1 (b) Halibut Catch Sharing Plan

The AP supports final action of the Halibut Catch Sharing Plan including the PPA adjustments as identified in the April 2012 Council motion with the exception of the allocation.

Alternative 3 would replace the fixed matrix of management measures under Alternative 2 with a requirement that the Council recommend, and the IPHC adopt, annual management measures to maintain charter halibut harvests within the respective allocations. The AP also supports separate accountability.

The AP moves to support the removal of the poundage drop by method 4 as described in section 2.5.11 of the CSP analysis.

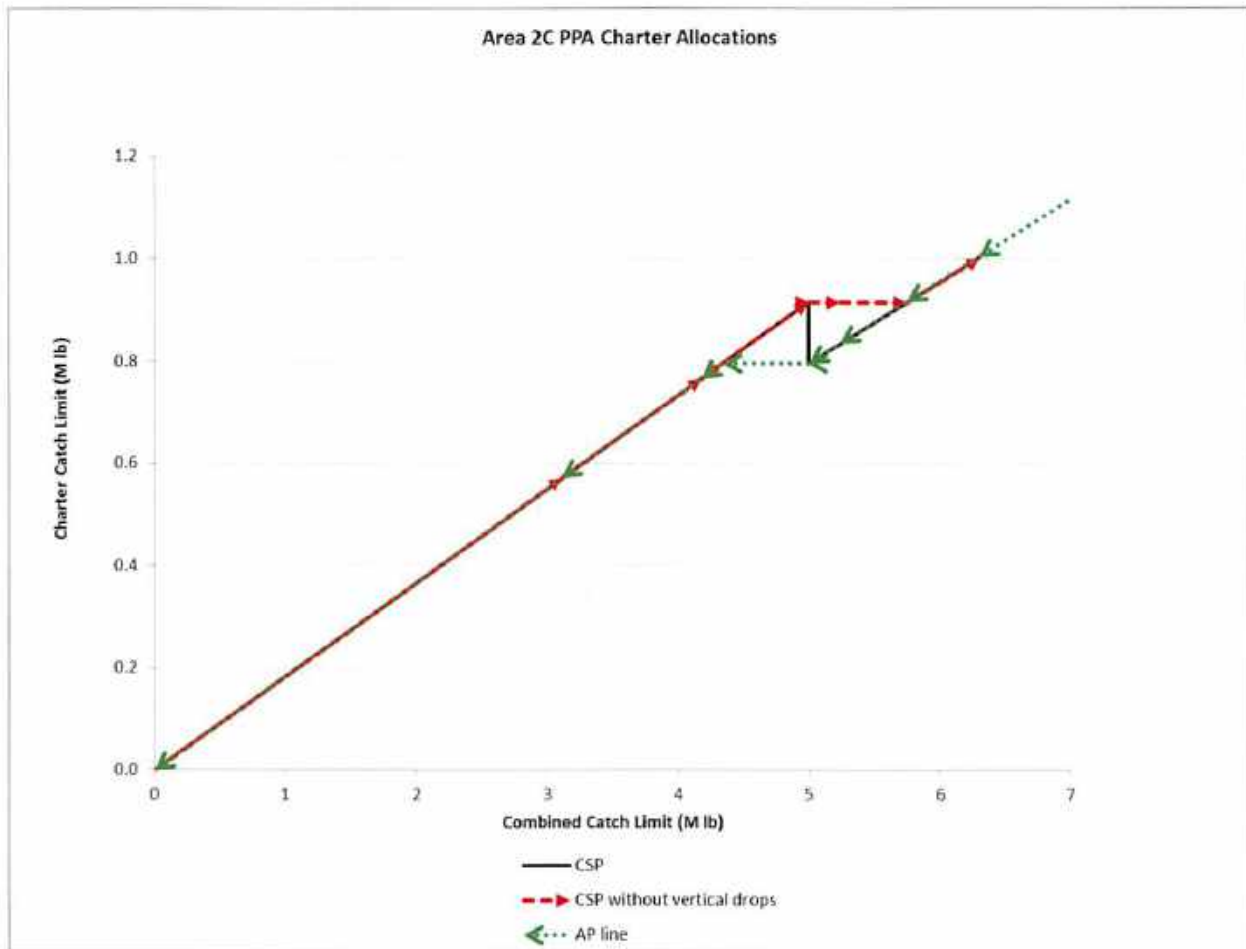
When CCL increases to the highest combined catch limit at the drop, use Method 4 as described in the analysis to establish the fixed pound allocation across that range until you reach the slope of the higher tier. When CCL decreases to the lowest point of the drop, fix the amount of pounds to the charter sector until you reach the slope of the line at the lower tier.*

The AP recommends that GAF can be returned at either of two dates: September 1 and a final return date of November 1. The AP requests an annual review of the GAF program.

The AP also requests that Council to task staff to initiate analysis of the common pool compensated reallocation program as a long term solution.

Motion passed 21/0.

*NOTE: The following figure provides a visual picture of the AP's motion on removing the drop. The red line (with arrow pointing to right) is followed when the CCL is increasing. The green line (with arrow pointing to left) is followed when the CCL is decreasing. If CCL changes direction when in the diamond area, you stay on the same line as the previous year.



The AP recommends the Council adopt Alternative 3 as the allocation basis for 3A and 2C. *Motion passed 14 to 6.*

Minority Report on C-1(b), Halibut CSP: A minority of the AP did not support this motion. A significant portion of those opposing believe that the allocation level in Alternative 3 is inadequate for the charter industry and in particular in Area 3A, where this alternative will reallocate over 1,000,000 pounds of halibut from the charter sector to the commercial sector, as referenced on page xxvii of the analysis. This would be over a 30% reduction in a steeply declining abundance. We believe this will cause undue financial harm to the charter industry and therefore fails to meet the problem statement.

Another portion of the AP minority did not support the motion because they believe that allocations from Alternative 2 should be the allocations for the CSP. Charter allocations as a percentage of the combined CCL in 2008 would have been 13% and 12.92% in 3A.

Signed by: Andy Mezirow, Tim Evers, Kurt Cochran, Becca Robbins-Gisclair, Jeff Farvour, Alexis Kwachka



National Association of Charterboat Operators

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President

Ed O'Brien
Maryland Charter Boat Association
First vice-president

Tom Becker
Mississippi Charter Boat Captains
Second vice-president

Gary Krein
Charterboat Assoc. of Puget Sound
Secretary

Ron Maglio
Michigan City Charter Boat Assoc.
Treasurer

Member Associations :

Alaska Charter Association
Anchorage Charter Fishing Association
Beaumont Harbor Charter Boat Association
Captree Boatman Open & Charter Boats
Charterboat Association of Puget Sound
Chicago Sportfishing Association
Deep Blue Charters Association
Deep Creek Charterboat Association
Destin Charterboat Association
Eastern Lake Erie Charter Boat Assoc.
Florida Guides Association, Inc.
Genesee Charterboat Association, Inc.
Golden Gate Fishermen's Association
Greater Point Pleasant Charter Boat Assoc
Hawaii Fishing & Boating Association
Homer (AK) Charter Association
Indiana's North Coast Charter Association
Islamorada Charterboat Association
Kenosha (WI) Charter Boat Association
Maine Association of Charterboat Captains
Marco Island Charter Captains Assoc.
Maryland Charterboat Association
Michigan City Charter Boat Association
Mississippi Charterboat Captains Assoc.
Northeast Charterboat Captains Assoc.
Northern Neck Charter Captains
Panama City Boatmen Association
Petersburg (AK) Charterboat Association
Prince William Sound Charter Boat Assoc.
Seward Charterboat Association
Sitka (AK) Charter Boat Operators Assoc.
United Boatmen of New Jersey
Virginia Charter Boat Association
Waukegan Charter Boat Association
Whitport Charterboat Association

September 28, 2012

Chairman Eric Olson
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501
Re: Agenda Item C-1: Halibut CSP

Dear Chairman Olson:

NACO is a National Association of Charter Boat Owners and Operators that was created in 1991. We represent over 3,000 individuals across the United States. Our membership includes marine charters who provide fishing, sailing, diving, eco-tours, and other excursion vessels that carry passengers for hire. We are the premiere Association that represents professional charter boat interests in our country.

A significant number of our Alaska members depend on Halibut for the survival of their small recreational For-Hire Charter (FHC) businesses. These small business owners have serious concerns about the proposed actions to be discussed by the Council. We have received comments from several charter associations and numerous individuals and see two key issues of concern, allocation and catch share provisions.

We support providing the most appropriate allocation for the recreational FHC owners based on traditional harvest or de facto allocation, the Guideline Harvest Limit. This allocation should be based on the biological condition of the stock and fairly applied to all users. Since you now have limited entry in the recreational FHC sector, you should be able to predict the projected harvest which should allow you to determine the need and what the social and economic impact will be on the small recreational FHC businesses and their communities.

Alaska has over 293,000 anglers every year. These small businesses and anglers contribute over \$800 million dollars in sales to your state and over \$59 million in state and local tax revenues (asafishing.org). Allocation issues are required to be "fair and equitable"; these small businesses deserve nothing less. We have concerns with the lack of information, as stated within your document that is necessary in order to create legitimate regulatory actions. We will reference some of these statements further in this comment.

We have serious concerns about the proposal to create catch shares in the recreational FHC fishery and the inter sector trading of commercial and recreational fish. Recreational FHC owners have serious issues with the proposed catch sharing proposal. We understand an alternative "pool sharing plan" has been discussed and offered by several associations that would at least remove any profit motives from those who own commercial IFQ. We urge the Council to include language to fast track analysis and action on the "pool sharing plan" as this plan concept has universal recreational FHC sector support and is the fairest way to move forward with a long term solution to the dispute between sectors.

In your draft document under *Effects of Alternatives* you state;

"Therefore, none of the proposed alternatives is expected to significantly impact the halibut stock." and: "There may be an effect on the human environment, as there are winners and losers under any sector allocation."

It is clear that your proposals have no bearing on the biological status of the stock so your proposal is designed for social engineering. It is also clear that your proposed catch sharing plan will create "winners and losers" thus causing many small recreational FHC operators to go out of business which causes a trickle up effect of loss of jobs in support businesses and economic harm to communities.

You state:

"The Council attempted to mitigate the impacts of the initial allocation on the charter sector by allowing charter limited entry permit holders to acquire additional allocation from the commercial sector, through financial compensation."

This is the classic example of creating "winners" in the commercial sector at the expense of creating "losers" in the recreational FHC sector. As long as there is no control by the Council to limit the fee charged to lease quota the recreational FHC owners could be held hostage to obtain quota. In addition, as long as the Council does not provide any assurance that quota will be made available to any recreational FHC owner; some owners may not be able to obtain any additional quota. These are just a couple of examples of how the proposed CSP can have unintended harmful impacts on the recreational FHC owners.

Under *Regulatory Impact Review* you provide information from your SSC. It states;

"As noted in the October 2007 Scientific and Statistical Committee (SSC) report, this analysis does not provide quantitative estimates or confidence intervals for the magnitude of net national benefits. Nor are quantitative estimates provided for regional economic impacts of the alternatives considered in this amendment. Because those estimates cannot be provided, given the information available, the analysis does not identify an optimal allocation."

This statement is from 2007, 5 years ago, and we seriously question the approval of any proposed amendment based on 5 year old data. The lack of a complete analysis when attempting to determine an "optimal" allocation does a disservice to those affected. Clearly, the inability to identify "an optimal allocation" because estimates are not provided is cause for serious concern. We have to question why there is a rush to create an artificial allocation when so many businesses and communities will be affected.

Your document further states;

"These estimates represent only gross ex vessel revenues, a portion of which would be distributed to vessel owners, crews, and support industries. In addition, processors of those fish, processor support industries, and consumers of commercially harvested halibut, and communities that receive fish tax revenue from the landings would also benefit from this redistribution of allocations. Losses to the charter sector would also arise, but those losses may not be as proportionately related to the pounds of halibut lost in 2012."

This clearly indicates that "losses" will occur in the recreational FHC sector. In addition, has any analysis been conducted on the impact to the commercial fishery and fish processors due to the removals of commercially harvested halibut from the consumer market place? As a general rule, when commercially harvested species are removed from the consumer market, the market suffers and recovery to previous market demand is difficult at best. Further discussion and analysis should be considered before going forward with any plan that will cause "losses" in the recreational FHC sector and potential loss of consumer demand.

Your document continues to state:

"Estimating the loss to the charter operator, let alone all the other sectors, is complex. Those losses Revised Area 2C/3A Halibut Catch Sharing Plan may more than offset the gains to the commercial sector, but because of the limited information available and the assumptions that would be required, those estimates are not generated."

This gross lack of information is cause for serious concern for the recreational FHC sector. How can the Council and NMFS seriously consider proposing such an over reaching regulation that has the potential to create extreme social and economic harm on a fishing sector and the communities where they operate?

This statement from your document is very interesting;

"Increasing the percentage of IFQ that holders of more than 10,000 lbs of IFQ in Area 3A may lease, results in about 300,000 lbs of additional IFQ being available as GAF. Whether these additional fish are needed will ultimately depend on charter client's demand for GAF and charter operator's willingness to participate in the program. Insufficient information is currently available to determine demand for GAF."

All of us in the recreational FHC sector fully understand "willingness" to pay. We offer services to recreational anglers and price those services according to demand and competition.

Clearly, when you allow the trade of commercial IFQ in the recreational FHC sector, you will create a competitive advantage to the upper scale owner and in addition you will create a situation where some recreational FHC owners will not be able to lease IFQs simply because they may not be liked by the lessor. In other words, the leasing or not is not solely based on economics. We know this from other commercial IFQ fisheries such as red snapper and groupers in the Gulf of Mexico as commercial fishermen who desire to lease commercial IFQs are unable to do so simply because they may not be in a select group.

The Government should not be the entity that creates "winners and losers" in any free market place. Without safe guards to prevent excessive price gouging, methods to ensure equal access to all who seek to lease, and to prevent large scale operators to outbid small operators, the catch share plan should be sent back to the table for further consideration. The "pool sharing plan" currently being discussed among several charter associations should receive serious consideration by the Council.

Under the *Economic Impacts of the Alternatives* your document states;

"Quantitative estimates or confidence intervals for the magnitude of net national benefits under each alternative are unavailable." and "Quantitative estimates of regional economic impacts and their distribution, accruing from the proposed alternatives, are also unavailable."

We question your desire to move forward with any management plan amendment when the alternatives do not provide any estimates or confidence intervals for the magnitude of net national and regional economic impacts. This appears to be contrary to the requirements of National Standard 8.

In the *Charter Sector* section it is stated;

"The commercial sector would be impacted if the charter sector were not constrained to its allocation or if the growth in demand for charter services by the public results in the Council recommending, and the Secretary of Commerce increasing that sector's allocation. It is also possible the commercial sector could petition the Council in the future to modify the charter allocation (although this is not the Council's intent)."

It is well known throughout all 8 regions in any mixed use fishery when one sector exceeds their allocation the other sector is affected. Since the MSA was reauthorized in 2006 the NMFS has used the term "sector accountability" in their effort to impose catch shares on all sectors. We fully support each sector not exceeding their respective allocations. While you state it is not the Council's intent to modify the charter allocation to benefit the commercial sector, clearly, such a request can always be made.

It is further stated;

"However, both the charter operator and the commercial IFQ holder must be willing parties for IFQs to be leased and converted into GAFs (i.e., the charter operator must pay a sufficient amount for the IFQs to compensate the commercial QS holder for forgone net revenues) (Criddle 2006a)."

This statement is a given and you should be extremely cautious as to how to require the recreational FHC sector to lease commercial IFQs. Many issues arise here.

Mixing commercial allocation with recreational FHC allocation creates serious problems with data reporting and future allocation issues. The fact that "the charter operator must pay a sufficient amount for the IFQs to compensate the commercial QS holder" clearly indicates why the Council should seriously consider the merits of the "pool sharing plan" being discussed among several associations. The "pool sharing plan" provides a means to prevent excessive profit taking, allows for fair access to additional fish to all who desire, and helps to create stability for the recreational FHC owners. It greatly helps to reduce government involvement and eliminates government from deciding who wins and who loses.

In most fishing areas of the United States, it is unlawful for anyone to buy, sell, or barter sport-caught fish. This CSP proposed will allow, indeed, encourage this practice. There are many issues to be considered here. The potential

for the illegal sale and trade of recreationally harvested halibut will likely increase. Certainly, law enforcement will have a more difficult time enforcing the illegal sale. Not only will this plan create this problem in Alaska, the precedent of approval of this plan will escalate to the lower 48 states and Hawaii creating serious concerns in other areas. It is necessary to ensure a distinct difference between recreationally harvested and commercially harvested fish.

Catch share programs in other areas of the country have created a new concept in fisheries, brokerage houses. There are businesses established that trade IFQs much like a commodities market. This proposed plan has the real potential to promote this type of activity which creates fish lords who have no vested conservation interest in the resource. They simply exist to profit from the efforts of fishermen who clearly are concerned for their marine resources. There is no provision in this plan to prevent such an activity.

Please listen to the charter captains affected by this proposed amendment and work with them to reach a solution so that jobs are protected as well as small businesses and recreational anglers continue to have free access to the resource. We appreciate your consideration and look forward to workable solutions.

Sincerely,

Captain Robert F. Zales, II
President

Cc: file
Senator Mark Begich
111 Russell Senate Office Bldg
Washington, DC 20510
c/o Bob King
bob_king@begich.senate.gov

Senator Lisa Murkowski
709 Hart Senate Office Bldg
Washington, DC 20510
By fax 202-224-5301

Representative Don Young
2314 Rayburn House Office Bldg
Washington, DC 20515
By fax 202-225-0425



PO Box 2850, Valdez, Alaska 99686

October 4, 2012

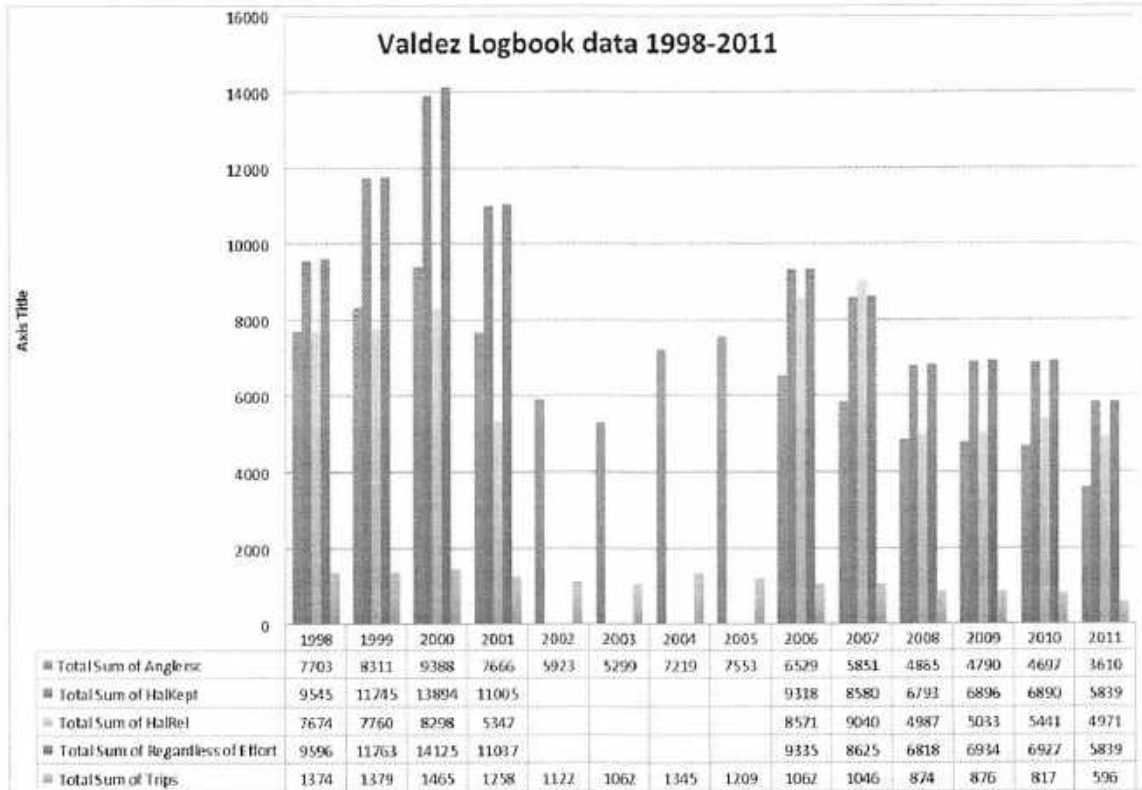
Chairman Eric Olson
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

Re: Agenda Item C-1: Halibut CSP

Dear Chairman Olson:

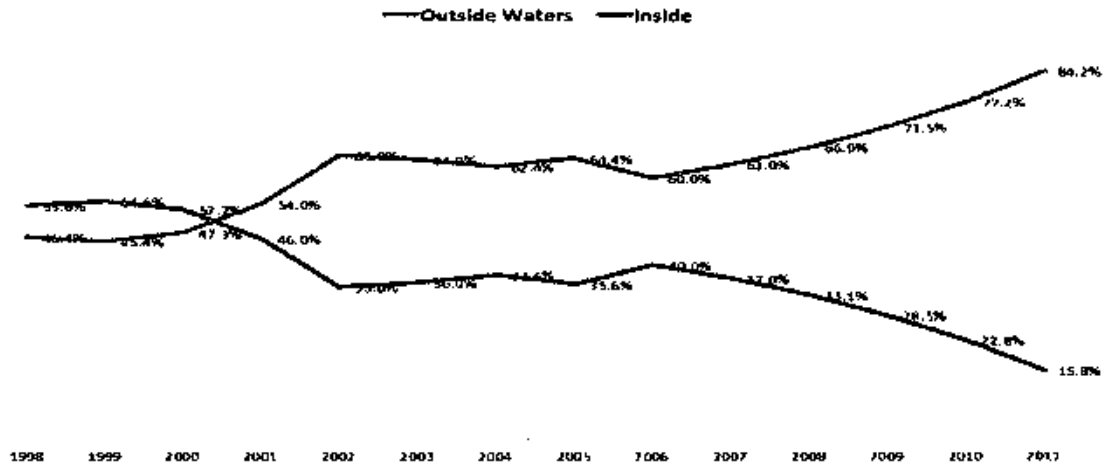
The members of the Prince William Sound Charter Association strongly oppose the existing CSP proposal and the GAF. Any measure that results in the charter fleets ability to harvest one fish while the unguided sector remains at two fish will surely be the final nail in the coffin for a quickly dying charter fleet in Valdez. Since the implementation of the IFQ program, the Valdez charter fleet has dramatically declined from a high of providing 9388 angler days with 1465 trips in 2000 to a mere 3610 angler days with 596 trips in 2011. At today's average charter price of \$340/person, Valdez has lost \$1,964,520.00 in gross annual charter sales alone not including the economic impact the loss of over 5,000 anglers brought to the remaining businesses in Valdez. Numerous businesses have failed and closed their doors since 1995 to include a once successful tackle shop and marine supply store along with restaurants and a grocery store. Why has a once great sport fishing destination slowly died?

AK F&G Logbook data provided by Scott Meyer



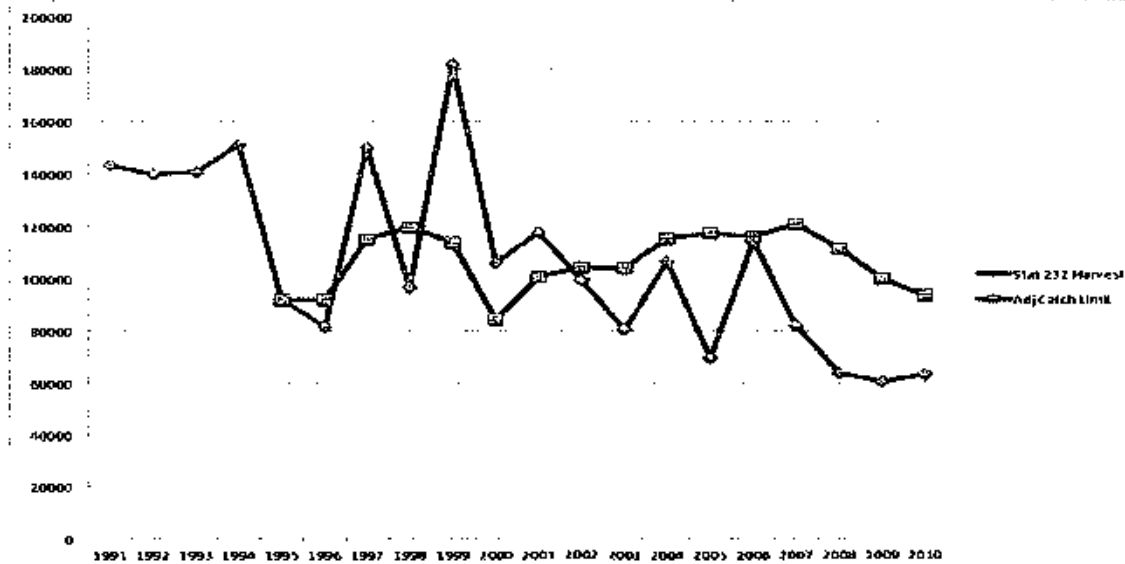
The reason Valdez has lost sport fishing opportunity is the result of the continual long-line pressure throughout the summer months and the increased amount of quota taken within the PWS stat fishing grounds. The guided and unguided anglers now must assume more risk and consume more resources to have the reasonable opportunity to harvest two fish or any fish that makes a charter trip worth the amount of resource harvested. Before the IFQ system, it was unnecessary to travel to the Gulf to catch fish and very few ever went past the entrance to harvest halibut. In 1998, after the logbook program started less than 50% traveled to the gulf. In 2011 84% of the charter trips were logged in outside waters of PWS. The reasonable opportunity to harvest two fish inside PWS is so poor that charters now cancel unless weather conditions only allow fishing in the Gulf which is 2.5 hours of travel time for even the fastest boats in the fleet.

Percentage of total trips to Stat areas insided and outside Montague/Hinchenbrook. Outside includes 466003 since most fish at the corner during poor wx.



Not only has opportunity for the sport fishing declined but also so has commercial opportunity in stat area 232 for inside waters of PWS. Before the IFQ implementation the commercial sector averaged over 140,000lbs of halibut in less then two 24 hour openers each year. Today, with nearly nine months of fishing opportunity the commercial sector harvests a mere 60,000lbs in the same area, a once well protected area from poor weather that Valdez sportfisherman could depend on for a reasonable chance to harvest halibut isn't even producing a reasonable opportunity for the commercial sector.

IFQC Harvest Data since 1991



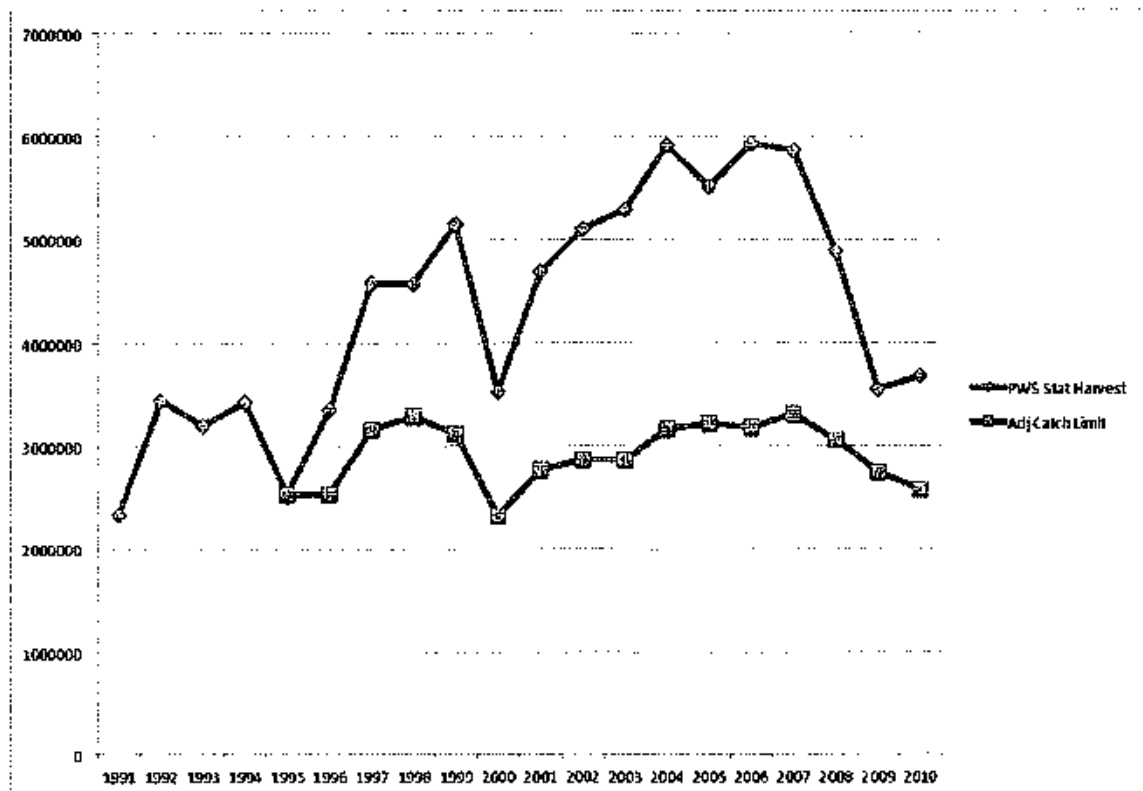
Why has fishing in stat area 232 declined? The reason is the increasing and continual pressure applied by the commercial sector in areas outside PWS and

interception along migration routes. The amount of fish harvested in outside stats like 240 have doubled since IFQ implementation and when all PWS stat areas are combined the harvest has over doubled since the IFQ program started.

As a result of the IFQ program and the CHP, the Valdez charter fleet has harvested 50% less fish then they were between 1998-2000; a de-facto reallocation of fish that are obviously being harvested by the commercial sector. Fisheries management has played economic Russian roulette with sport fishing charter fleet in Valdez and most have lost. The passage of any measure that drives the opportunity to harvest two fish for only the guided angler will drive clients away and be the final bullet that kills halibut charters in Valdez. We strongly urge the council to reconsider the CSP and GAF and develop measures that will prevent further economic devastation that has already occurred.

Melvin B. Grove Jr.
 President PWSCBA

Total PWS Commercial Harvest



Note: The adjusted catch limit is a graph of harvest limit based on the amount of harvest in each stat area with given annual IPHC increases. A theoretical harvest amount if the same amount of quota fished in the stat in 1995 changed only based on IPHC increases.

September 24, 2012
Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ste 306
Anchorage, AK99501
Re: C-1 Halibut Catch Share Plan (CSP)

My name is Steven Peavey, I am a 18 year old high school senior. I have been longlining for halibut since I was 8 years old. I am a quota share holder, investing in the fishery. I have lost $\frac{3}{4}$ of my quota for conservation issues and allocations to other user groups.

I have read a headline that you endorse: it reads: The councils develop catch share programs and fair allocations to keep fisheries economically viable. The idea to revoke the C-1 Halibut Catch Sharing plan adopted in 2008 goes directly against this for me as far as the term economically viable goes. It is not economically viable for me to take another cut.

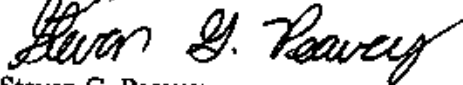
I feel that the charter fisherman should buy quota from a fisherman willing to lease or sell to them, but first, they should be found worthy of it. I had to prove my ability to fish in order to get a Transfer Eligibility Certificate, what do they need? It is not fair to strip the commercial fisherman of another 40-45 million dollars worth of halibut. I want you to know that I support the catch share plan percentage allocations adopted in 2008. Please commit to these allocation.

How often does NMFS check the charter boats? It seems like NMFS are always checking Commercial boats and now we are going to have observers on board that we are paying for. Does NMFS ever check the logbooks of the charter vessels? We need to stop the honor system because last summer my father and I heard a charter boat skipper tell another captain not to worry about writing down a catch in the logbook.

Ray Troll has a design showing longliners, trollers, seiners, and gillnetters, with words going around the design saying commercial fisherman feeding the world, it doesn't show charter boats because charter boats only feed a small group of wealthy society. In area 2c and 3a commercial fisherman provide 7-9 million halibut meals to Americans every year. Commercial fisherman depend on catching these fish as a way of life. Charter operators only market the opportunity to catch a fish.

I am not on drugs or breaking into cars. I work hard and keep my grades up. The cutting of my quota share that is not for conservation is like robbery. You are stealing from me and giving to another person. I had planned on paying for my college education and now I am faced with loans instead. What is my hard work getting me? It appears to be leading me to welfare. Thank you for your time and please understand that I am speaking for all the kids in the fishing community.

Sincerely,



Steven G. Peavey
F/V Anne Louise
P.O.B. 442
Craig, AK 99921

October 4, 2012

Good Morning, My name is Saw xuunga, Frank Wright Jr. I am the president of the Hoonah Indian Association from kayashkahit the luknaxadi clan, Coho.

The traditional fishing ground for the Huna People have been Icy Straits, Cross Sound, and Glacier Bay areas. We are the people that believe in taking care of our way of life which is our food. If you look at me you see the traditions of our people living off the land. This has become a tribal issue for the existences of the Hoonah People. We have a totem pole that has a halibut on it and prove the halibut does have significant meaning to our people. To our people subsistence is our way of life. When we lose a piece of our life we diminish our existence as a people.

The **traditional commercial** fisheries "meaning local people working on the fishing grounds" that have been passed down for generations and I would like that to continue.

The **New Commercial fisheries:** "Charter Boats" are made up of non-locals coming from other states and other communities, with little knowledge of caring for the fishing grounds. They have no ownership of the community so once an area is fished out they move on to fish out other areas. This is happening in our area that charter boats are coming from the surrounding communities, Juneau, Gustavus, Haines and Elfin Cove. This needs to STOP, be reevaluated, and better regulated.

The young people don't have the means to purchase the IFQ quota, the price is set out of reach for any of them (banks will not help them buy IFQ). Why purchase a quota that keeps getting cut back? I lost approximately 2/3 of my quota. I own quota in both 2C and 3A. I cannot afford to buy quota, I would put my livelihood in jeopardy if I become ill and could not go fishing.

A local person that is not a fisherman was complaining to me that the fish that was coming in was too small.

The tribe is concerned with our subsistence's but we cannot go to court because of our limited resources. I as a Commercial fisherman don't have the bucks to fight and will continue to keep losing my quota.

Hoonah will always be a fishing community we will always respect the conservation of the fisheries. Last year I heard an elder talk and he said that we will not diminish our way of life!

Thank you for your time and consideration on this matter.

Hoonah Indian Association

Frank Wright Jr.

President

C-1 Halibut Catch Sharing Plan

Final action

October 5, 2012

The Council recommends Alternative 3 for Area 2C and Alternative 4 for Area 3A as its preferred alternative for the halibut catch sharing plan (CSP). The purpose of the proposed action is to create a halibut catch sharing plan that establishes a clear allocation, with sector accountability, between the charter and commercial setline halibut sectors in Areas 2C and 3A. To this end, the Council requests that the IPHC annually set a combined charter and setline halibut catch limit, to which the allocation percentage for each area will be applied to establish the domestic harvest targets for each sector. The Council also supports the IPHC implementation of separate accountability for the charter and commercial sectors such that wastage in the commercial sector is deducted from the commercial sector's catch limit and wastage in the charter sector is deducted from the charter sector's catch limit.

This action also outlines Council intent to engage in an annual process for determining charter halibut management measures. Upon analysis, and through the Council process, the Council will select the management measure that best minimizes the difference between the annual projected harvest and target allocation, without exceeding the charter halibut allocation. This will allow the Council and public to engage in an effective and transparent process for considering both stakeholder input and the most current information regarding the charter fishery and its management. Annual management measures recommended by the Council will be provided to the IPHC for implementation during the subsequent fishing year.

The Council recognizes that management measures are imprecise; therefore, a small variance can be expected to occur around the target allocation. The Council's expectation is that these variances will balance over time, to ensure IPHC conservation and management objectives are achieved, and that harvest projections will improve over time as fishery information improves.

Under this action, in Areas 2C and 3A, there is no retention of halibut by skipper and crew while paying clients are on board.

Element 1 – Charter allocation

Area 2C:

At a combined charter and setline halibut catch limit of <5 million pounds, the charter allocation will be 18.3% of the combined charter and commercial setline halibut catch limit. When the combined charter and setline halibut catch limit is between ≥5 million pounds and ≤5.755 million pounds, the charter allocation will be 0.915 million pounds. When the combined charter and setline halibut catch limit is >5.755 million pounds, the charter allocation will be 15.9% of the combined charter and setline halibut catch limit.

Area 3A:

At a combined charter and setline halibut catch limit of <10 million pounds, the charter allocation will be 18.9% of the combined charter and commercial setline halibut catch limit. When the combined charter and setline halibut catch limit is between ≥10 million pounds and ≤10.8 million pounds, the charter allocation will be 1.890 million pounds. When the combined charter and setline halibut catch limit is between >10.8 million pounds and ≤20 million pounds, the charter allocation will be 17.5% of the combined charter and commercial setline halibut catch limit. When the combined charter and setline

halibut catch limit is between >20 million pounds and ≤25 million pounds, the charter allocation will be 3.5 million pounds. When the combined charter and setline halibut catch limit is greater than 25 million pounds, the charter allocation will be 14.0% of the combined charter and commercial setline halibut catch limit.

Area 2C

CCL (Mlbs)	Charter %	Charter Mlbs	IFQ %
0- <5.000	18.30%		81.70%
5.000 – ≤5.755		0.915	
>5.755	15.90%		84.10%

Area 3A

CCL (Mlbs)	Charter %	Charter Mlbs	IFQ %
0 - <10.000	18.90%		81.10%
10.000 – ≤10.800		1.890	
>10.800 – ≤20.000	17.50%		82.50%
>20.000 – ≤25.000		3.500	
>25.000	14.00%		86.00%

Element 2 – Charter harvest data collection method

Upon implementation of the halibut CSP, the Council recommends using Alaska Department of Fish & Game logbooks as the primary data collection method for charter harvest.

Element 3 – Guided Angler Fish (GAF)

Individual charter halibut permit (CHP) holders will be allowed to lease commercial IFQ, in order to provide charter anglers with harvesting opportunities, not to exceed limits in place for unguided anglers.

1. Leasing commercial IFQ for conversion to Guided Angler Fish (GAF):

- A CHP holder may lease IFQ for conversion to GAF for use on the CHP.
- Commercial halibut QS holders may lease up to 10% or 1500 pounds of their annual Area 2C IFQ, whichever is greater, for use as GAF. Commercial halibut QS holders may lease up to 15% or 1500 pounds of their annual Area 3A IFQ, whichever is greater, for use as GAF.¹ If a QS holder chooses to lease IFQ to a Community Quota Entity (CQE), the same limitations apply.
- With regard to a CQE leasing its IFQ, any quota which a CQE holds, regardless of origin, could be leased up to 100% to eligible residents of the CQE community as GAF. For

¹ The lease limits (10% or 1500 pounds of Area 2C IFQ, whichever is greater and 15% and 1500 pounds of Area 3A IFQ, whichever is greater) apply to the start year fishable IFQ pounds for an IFQ permit. Start year fishable pounds is the sum of IFQ equivalent pounds, as defined in regulations at § 679.2, for an area, derived from QS held, plus or minus adjustments pursuant to § 679.40(d) and (e) of this title.

example, a CQE may hold IFQ derived from purchase, leased from another qualified CQE, or leased from an individual, and then lease up to 100% of the quota it holds to eligible residents.² If the CQE is leasing IFQ to an individual that is not an eligible resident to use as GAF, the CQE has the same limitations as other QS holders (i.e., up to 10% or 1500 pounds of their annual Area 2C IFQ, whichever is greater; and up to 15% or 1500 pounds of their annual Area 3A IFQ, whichever is greater.)

- No more than 400 GAF may be assigned to a CHP endorsed for 6 or fewer clients.
 - No more than 600 GAF may be assigned to a CHP endorsed for more than 6 clients.
2. CHP holders harvesting GAF while participating in the charter halibut fishery are exempt from landing and use restrictions associated with the commercial IFQ fishery, but subject to the landing and use provisions detailed below.
 3. GAF will be issued 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 for each area. In the first year of CSP implementation, the GAF weight-to-fish conversion factor will be based on the previous year's estimates of each area's average weight of halibut harvested in the charter fishery, or the most recent year without a charter halibut size limit in effect.
 4. Except for CQEs as described above in provision 1, subleasing of GAF will be prohibited.
 5. Unused GAF may revert back to IFQ pounds and be subject to the underage provisions applicable to their underlying commercial QS on September 1, with an automatic return 15 days prior to the end of the commercial halibut fishing season each year.
 6. Charter operators landing GAF on private property (e.g., lodges) and motherships would be required to allow ADF&G and IPHC samplers/enforcement personnel access to the point of landing.
 7. Commercial and charter fishing may not be conducted from the same vessel on the same day.
 8. The skipper is responsible for ensuring that GAF are marked by removing the tips of the upper and lower lobes of the tail and reporting the length of retained GAF halibut to NMFS through the NMFS approved electronic reporting system.

² With respect to a charter business that may be leasing IFQ from a CQE to use as GAF, the charter business is considered an eligible resident if it operates in the CQE community (e.g., charter trips begin and/or end in the community).

October 2, 2012
Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ste 306
Anchorage, AK 99501
Re: C-1 Halibut Catch Sharing Plan (CSP)

I am Kathy Peavey, from Craig in Southern Southeast Alaska on Prince of Wales Island. I am from a hardworking commercial fishing family. My husband and children have bought into the IFQ program in area 2C. I gave my quota to my daughters to use for college which they both have successfully done, but with some loans towards the end. My husband, Matt Peavey would be here, but today he is under water, literally underwater diving to pay for our halibut loans. I would prefer him to stay above water but he panics out about our loans. Unfortunately my contribution to the family as a glass artist, marine debris contractor and whale watching tour guide is not enough to cover our bills. The loans that we took out from the State of Alaska division of investments are hurting us. When we purchased quota, we did so with the expectation that you would not gift these fish we paid for to another user group.

Please understand that this potential reallocation of the C-1 CSP will unfairly hurt my family and other fishing families in Alaska. You have several letters from fishermen in Craig and I encourage you to seek them out of your packet and read them again.

We are all for the conservation of the resource, but we have taken our fair share of cuts of halibut quota and can barely untie from the dock and make a living at it anymore. Our expenses are not getting any cheaper. Our quota share and investment is depleting and we cannot fathom another giveaway.

Commercial Fishing families are an intricate part of the web in Alaska. Our raw fish tax goes to cities and villages, the charter fishermen do not contribute to this or to the 3% salmon enhancement tax. We also pay for our own management of IFQ's with fees.

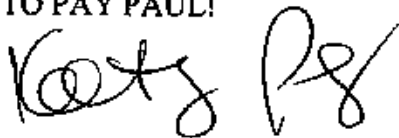
I encourage the council to not allocate more quota to the charter sector. Our family supports the 2008 CSP allocations included in alternative 2 and the streamlined management process outlined in alternative 3.

Ultimately, who will the shift of more quota share to the charter sector affect the most if you choose to do so? I feel it is my family and others who are in the same boat.

The basic principal I want to leave you to ponder is something we all learned as kids:

YOU CAN'T ROB PETER TO PAY PAUL!

Sincerely,
Kathy Peavey
F/V Anne Louise
POB 442 Craig, AK 99921 907 401-0790



Chairman Oliver, council members, thank you for the opportunity to testify today. My name is Steve Zernia. I own and operate ProFish-n-Sea Charters in Seward. I support the approval of the CSP including the GAF provision to put the charter and commercial industries on track for a stable future as long as the plan comes with a FAIR allocation. We have been managed by the GHL for about 10 years and in 3A have only exceeded the GHL by a significant margin one time. The GHL didn't share in the gain as commercial catch limits did in the early 2000's. And until this year had also been protected from the pain of declining abundance. It's a bit like the housing market in the lower 48 vs. the market in Alaska. We didn't see the huge gains but haven't seen the big losses either. This isn't to say, however, that charter CATCHES haven't declined. They have. Declining from a peak of 4 million pounds in the mid 2000's to a little more than 2 ½ million pounds now. That's a large decline, brought on by a weaker economy, implementation of the Charter Halibut Permits, and smaller less plentiful fish. As abundance declines charters can't simply increase effort to maintain harvest. Our harvest naturally declines. This is obvious by looking at our harvest numbers in 3A over the last several years. I see the GHL as our de facto allocation and a fair place to start, but in the interest of compromise and sharing more of the pain of declining abundance, I would support Allocation Alternative 5. Any further redistribution to the commercial sector would be unacceptable. Thank you...

69
Brandon

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

AGENDA C-1(b)
Supplemental
OCTOBER 2012

Date: 9/2/2012

RECEIVED
SEP - 6 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Gale Croed

Address: 12175 Glacier Hwy #E-404

Juneau, AK 99801

(907) 523-4831

Received 193 form letters, see copies on Secretary's table

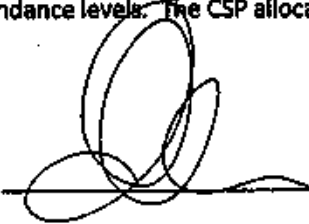
Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Name/Signature: _____

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

RECEIVED

SEP 25 2012

Received 14
post cards

Fax 907-271-2817

Date: 9/2/12
 Mr. Eric Olson, Chair
 North Pacific Fishery Management Council
 605 West 4th Ave, Ste 306
 Anchorage, AK 99501

Dear Mr. Olson,
 Re: **Halibut Catch Sharing Plan (CSP)**

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are **fair and equitable** because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for **ALL** sectors to share in conservation of halibut, equally, at all abundance levels.

The CSP allocations set in 2008 **SHOULD NOT** be changed because of political interference. **The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.**

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

I might add, our **QUOTA POUNDS SINCE 2007 HAS DIMINISHED DRASTICALLY!!!!** In 3A it was close to 12,000 lbs in 2007; in 2C, it was 14,000 lbs. **TODAY, OUR QUOTA IS 4716 LBS AND 3820 LBS respectively!!!!** Again, why do we have to invest, and the CHARTER sector does not???

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; **this is the most effective way**. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. **Why shouldn't they have to invest if they want more quota??**

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that **commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance**. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Sincerely,

Name: _____

James Moore FV Aljac Troller

Pob 170 Haines AK 99827

wally soroka**RECEIVED**

SEP - 5 2012

From: "wally soroka" <soroka@mtaonline.net>
To: <npfmc.comments@noaa.gov>
Sent: Saturday, September 01, 2012 10:45 AM
Subject: CSP 2008 allocations

I would like the comments contained in this email considered when decisions are made regarding 2008 CSP allocations.

My name is Walter Soroka and I live in Willow Alaska. After retiring 10 years ago, I decided to supplement my retirement income commercial fishing for halibut in Prince William Sound. To accomplish this, I used a substantial portion of my retirement savings to purchase halibut IFQs which I fish in Prince William Sound.

After investing a portion of my life's savings in these IFQs it would be extremely unfair if the council reallocated a portion of my assets to the charter industry without any compensation to me.

I do support the guided angler fish provision which is a fair and equitable way to manage a limited resource. If those in the charter industry want more fish they could obtain them through additional investments in their business...exactly like I did, and people like me would be compensated for what we have already invested.

The CSP allocations set in 2008 are reasonable and should not be changed.

I would be happy to provide further information and can be reached at (907) 495-2627, via mail or email.

Walter Soroka
PO Box 849
Willow, AK 99688



9/1/2012

Subject: CSP 2008 allocations

From: "wally soroka" <soroka@mtaonline.net>

Date: 9/1/2012 10:45 AM

To: <npfmc.comments@noaa.gov>

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Walter Soroka
PO Box 849
Willow, AK 99688

Subject: catch sharing plan

From: "sigurd rutter" <fv_nuts@mail.com>

Date: 9/2/2012 4:37 PM

To: npfmc.comments@noaa.gov, Halibut Coalition <halibutcoalition@gmail.com>

My name is Sigurd Rutter. I fished halibut for 32 yr. I sold my QS last year, and bought Sablefish, just because of nonsense like this proposed reduction. But, my wife still has a little halibut QS. Haven't we given up enough already? To the charter nazis? The actions of this council are a crime against humanity. Charter fishing is an organized crime, that thrives by corrupting the political process. This process stinks to high hell. Every time a conservation measure, aimed at the charter fleet, makes any sense at all, it gets killed by NMFS. At the direction of our bought and paid for congressional delegation. Conservation used to be the ethic promoted in magazines like Outdoor Life, and Field & Stream. Now, it's management for "game hogs". It's goddamned high time the charter nazis shared the pain of conservation management. If anything, the charter fleet should give some of their ill gotten gains, back to the legitimate halibut fleet. Bob Penney didn't give a subdivision in Salt Lake to Ted Stevens, for nothing. Or, a lot on the Kenal river to Lease-a-Murkowski. Clean up the halibut management process, and do what's right, for a change. Sigurd Rutter, Sitka.

Subject: Re: ACTION ALERT: October Council Action on Halibut Catch Sharing Plan (CSP)

From: john maher <maher@sailmycia.com>

Date: 9/2/2012 10:01 AM

To: npfmc.comments@noaa.gov

On Sep 1, 2012, at 2:29 PM, Halibut Coalition wrote:

Date: 09-02-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

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My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: john maher / commercial fisherman / IFQ holder family with Alicia

Munyer _____

Address: ...po box 6422, Sitka Ak.
99835 _____

--

catch sharing plan

Subject: catch sharing plan

From: "sigurd rutter" <fv_nuts@mail.com>

Date: 9/4/2012 5:25 AM

To: npfmc.comments@noaa.gov

Charter fishing is an organized crime. And, a crime against humanity. Sigurd Rutter, Sitka, AK

Subject:

From: John norris <hemlockridgecharters@hotmail.com>

Date: 9/5/2012 8:58 AM

To: <npfmc.comments@noaa.gov>, Matt Kopec <matt@fishwhittier.com>, PWS Eco-Charters <pwseco@yukontel.com>

Hello,

I just have a couple of items that I think will help Sport fishing for Halibut.

Season: May 1 to September 15

Limit: 4 fish per person season limit for all sport fishing. Private or Charter

Harvest Ticket: \$10 for the harvest ticket. To be used to improve research on Halibut & manage Harvest.

Harvest ticket Information: Date, Location of harvest, Length, Recreational Boat or Charter Boat

These options are much better than the catch share plan. Even a 2 fish per season limit is better. Subsistance needs to be lowered to a reasonable harvest also.

Thanks,

Captain John Norris

Hemlock Ridge Charters of Alaska

Captain John Norris

Hemlock Ridge Charters of Alaska

John Norris 907 315-1724

Po Box 625

Whittier, Alaska 99693

whittieralaskacharters.com [web site](#)

RECEIVED
SEP 9 6 2012

Hi. Mr chairman ; Members of the Council My name is Markel Basargin I'm a fisherman my whole life, I Invested

in halibut IFQs. No cash. Loans!!! I was barley making payments last couple years, no profit!!! now im going in reverse. now I have to work hourly somewhere to make my payment. now look at these numbers this year from my 3-A halibut NIMS ID# 36063 permit# 51449 1,523 lbs.

Sold at \$6.35 lb thats \$9,674 income the IFQ charter charges 35% to fish them for me thats \$3,386.07 expence. My payment is \$7,000 expence my Loan# is 10-220-0074621 from AK Division of investements. now I bought my IFQs where they were a lot cheaper a few years back at \$18 lb. a pound.

OK look \$9,674 income for 1,523 lbs. at \$6.35.
expence - 3,386.07 for IFQ charter
expence - 7,000 Loan Payment
In the hole - 712.07 minuse

Markel Basargin 9/1/2012

Now cry out loud for the guys that bought there Pounds at \$30 a lb. or more. Please consider carefully and make it fair for use thank You,



Mr. Chris Garcia

Dear Eric Olson

I am definitely opposed to giving the charter fleet more allocation for years they have been rewarded for over fishing whereas the long line flat gets penalized for over fishing it is time to stop rewarding them and make them stay within their allotment our shares should ~~not~~ never been cut to give them more

Sincerely
Chris



Fax

To: WPFMC From: Jim Moore
 Fax: 907-271-2817 Pages: 2 including Cover
 Phone: 907 314 0569 Date: 9/3/12
 Rec: _____ CCI: _____

Urgent For Review Please Comment Please Reply

PLEASE READ ^{letter} THE PAY ATTENTION TO
 how DRASTICALLY our QUOTA HAS
 already been cut.

2007	3A	Our Quota	12,000#
2012	3A	Our Quota	4716#
2007	2C	Our Quota	14,000#
2012	2C	Our Quota	3820#

Thank you

Jim Moore F/V aljac
 Alaska

Anchorage, Alaska
September 2, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste. 306
Anchorage, AK 99501

RECEIVED
SEP - 5 2012

Members of the Management Council:

It is called theft when, without the consent of the owner, a person or persons takes assets from one citizen and gives that asset to another citizen or group of citizens without the authority of the court or Congress. The North Pacific Management Council, without the authority of the court or Congress, and certainly without my consent, is proposing to give part of one of my assets, part of my halibut quota, to the charter fishery. I don't believe that the Council has the right to give that asset to another regardless of how deserving the Council believes that entity to be.

How do I know that halibut quota can be classified as an asset? Not by my definition alone. Banks and the State of Alaska make loans on the purchase of quota. The Internal Revenue Service considers the quota as a monetary asset when collecting taxes as does the court when filing probate.

The Halibut Catch Sharing Plan (CSP) was determined and published in July 2011 based on allocation percentages adopted by the Council in October 2008. The charter fleet was afforded an allowance without having to pay for entry into the fishery. At this point any additional "gift" to the charter fishery based on quota taken from established fishermen should be regarded as theft. If the charter fishermen want additional quota they should purchase that quota on the market, and not expect a handout.

Banks will be afraid to make loans on any quota if the Council arbitrarily decides to change the rules every three or four years. And the charter fleet will never be satisfied to pay for something that they can get for free by simply manipulating the Council.

My family is dependent on income derived from fishing quota. I am a member of the Seafood Producers Coop, and sell to other local fish buyers. This in turn supports the shore based communities that process the fish from the quota I presently hold.

Thank you for this opportunity to comment.

Sincerely,



L. J. Davis
7220 E. 22nd Ave.
Anchorage, AK 99504

Eric Olson

I am a small time commercial halibut fisherman.

In the past several years my quota has gone down by almost half because of quota cuts and cutting my quota even more so the charter fleet can have more is not right. I had to purchase every share that I have and that cost a lot of money, my loan is not payed off so losing even more is a hard financial hit to me. I am asking you not to let the charter fleet to have another 4-5% of the quota

Sincerely

Michael Bouray

3291 Balika Ln.

Kodiak, AK. 99615

RECEIVED

SEP - 5 2012

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/4/2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 5 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.**

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name:

Rick Williams

Address:

P.O. Box 1321 Petersburg AK 99833

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-1-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

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The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and in 2011 trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IFQC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

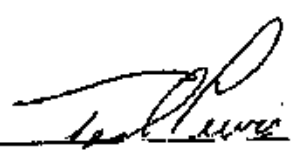
My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

Over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment

Sincerely,

Name:

TED LEWIS 

Address: 28126 102nd AV SW Vashon WA 98070

SINCE I.F.Q PROGRAM STARTED I HAVE SPENT OVER \$500,000 DOLLARS ON 20 Halibut I.F.Q. I'm NOT TALKING ABOUT MY VESSEL THE 10FT R/V KAYSIE OR THE MONEY I HAVE SPENT ON QUOTA. I think the charter fleet has been given enough. ENOUGH SAID. TEL

Date: 9/3/2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP - 6 2012

Dear Mr. Olson,

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I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Name:

Paul Clampitt

Address:

7721 168th Pl SW. Edmonds, WA 98026

Date: _9/3/2012_

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 6 2012

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Thank you for the opportunity to comment.

Sincerely,

Name:

Adriana Alvarez-Clampitt

Address:

17707 Talbot Rd Edmonds WA 98026

RECEIVED
SEP - 6 2012

SEPT. 7, 2012

RECEIVED

SEP - 6 2012

DEAR MR. OLSON

MY NAME IS DIONICI REUTOV I AM
A LONGLINER (HALIBUT & BLACKCOD) & SALMON
FISHERMAN, C.I. DRIFT. I INVESTED HEAVILY
INTO IFQ FISHING I OWE THE BANK
\$500,000.00. I CAN'T EVEN MAKE A PAYMENT
WITH WHAT I GOT LEFT NOW. SO IF YOU
REALLOCATE MORE HALIBUT TO THE CHARTER
SECTION YOU'RE TAKING MONEY FROM ME
AND GIVING TO THEM. THE CHARTER GROUP
ARE NOT THE ONLY ONES HURTING. THEY DON'T
HAVE AS MUCH INVESTED AS THE COMMERCIAL
GUYS. DON'T LET THEM HURT US ANYMORE.
THEY WANT FREE WELL WE DIDN'T GET
FREE. I'M PAYING THE BANK WITH SALMON
MONEY FOR ^{THE} IFQ LOAN.

PLEASE TAKE THIS LETTER INTO CONSIDERATION,
PUT POLITICS ASIDE AND BE FAIR.

Sincerely yours



DIONICI REUTOV

P.O. BOX 4251

HUMER AK 99603

RECEIVED

SEP - 6 2012

Dear Mr. Olson,

I am 22 years old and I just got married, I bought a boat and I'm

trying to start off with 1,600 pounds of IFO's. I owe the bank \$200,000

and if you guys give away anymore

of my share to the charters, I won't

have anything left and still owe the bank.

So PLEASE don't do this to me

and my family! The charters aren't

the only ones who have families to

support and are hurting! Please take

My ~~message~~ ^{LETTER} into consideration! Thank you!

Sincerely Avraamy Reutov

RECEIVED

SEP - 6 2012

I believe there should be absolutely no quota given to the charter industry. We commercial fishermen depend on the IFQ's that we have, it is our way of life not just a summer sport like the charter men use them.

When IFQ's began we had to buy in with our own money and are still paying for that full amount when already some was given to them. Technically the charter industry is stealing from us!! Enough is Enough they don't need any more, they agreed to the CSP in 2008 because it was fair. The charter industry should be happy with what they got and that's final!

Sincerely,

David Linn 09/13/12

RECEIVED

SEP - 6 2012

Dear Mr Olson,

I started fishing longline for halibut in 1989. I got two years in before they got serious about I.F.Q. I was eligible & got couple thousand pounds. It was either sell out or buy more I decided to buy a little more to make my story short, I bought 3b shares in 2001 I had 11,000 lbs. Today I have 3700 lbs. It was bad investment ~~for~~ some might say, it was my choice and I bought the shares. For charters it should be the same if they want to fish they should buy shares and not ask that the commercial fishermen loose 5% of the share so they get a chance to fish. It has to stop somewhere. sometimes it will never be enough for them, they got 25% over there harvest and now they want more. It has to stop. Our state loan payments aren't getting smaller but our quota shares have been cut almost in half. I think what they had they should be happy with that.

Thank you

Sincerely

Larry Reator
P.O. Box 1190
Homer AK 99613

Marty Johnson F/V K-Rae
504 First St.
Sitka, Ak 99835
907-738-0813

RECEIVED
SEP - 6 2012

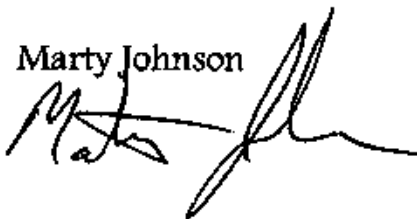
To whom it may concern,

I have been commercial halibut longlineing since 1978. First hand hauling in a 13' Whaler then fishing for other skippers on larger boats. I fished for other boats during the "derby days", so when IFQs came out, which I saw as a good thing, I wasn't allocated any shares. Rather than complaining I bought my own quota shares and assumed that it would be a good investment. All-in-all, it has been a good deal and I knew the quota would go up and down over the years.

I don't feel that it's right that the charter fleet has continued to ask for more and more quota without any regard to conservation during the ups and downs of the halibut cycles. I feel the charter fleet should accept the allocation that the council set in place in 2008. If they want more quotas, they can buy into their own fishery the way I did. The charter fleet needs to learn how to manage their fishery the way the commercial fleet has.

Sincerely,

Marty Johnson



LUNY

2005	—	63,068.10
2006	—	71,262.87
2007	—	78,026.62
2008	—	59,802.57
2009	—	41,943.95
2010	—	33,454.57
2011	—	30,712.21

RECEIVED

SEP - 6 2012

Mr. Eric Olson

Above is a copy of my longlining income per calendar year. This includes 2C, 3A halibut and SE. Sablefish. As you can see this is really hurting our income.

I am 70 years old now and would like to sell my quotas but the number of pounds now allocated is so small the quota has little value

Thanks for looking,

John Wood

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: Sept. 4, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP - 6 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSR supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Mike Johnson

Address: Box 1344 Sitka, Ak 99835

over

With the price of fuel these days and the small amount of Quota I have, it is Hardly worth the time, or the wear and tear on my equipment to even catch my Halibut.

I do not think it was right to let the Commercial/Charter Fleet go as far as they have been let to go at all. They should have been stopped years ago!

Mike Johnson

RECEIVED

SEP - 7 2012

9-6-2012

To Whom it may concern,
My name is Patrick Davis.
I was born and raised
in Sitka, Alaska, I am
an Alaskan Native I
was allocated halibut IFQ
shares while growing up
and fishing with my father,
my father fished halibut
with his father, John Davis,
out of Southeast Alaska.

I strongly believe subsistence
fish should have first priority
if fish stocks are down
then commercial harvest.
Over the years I've seen more
and more new comers on
the fishing grounds (charter boats).
It has exploded to a fleet!
while the halibut stocks fall
off dramatically!

Just because you buy a
sport fishing license does not
entitle you or guarantee a fish!

A true sportsman would have
no problem with catch and release
of a fish if there is a low
abundance.

Paul M. Davis

Ph: 907-738-3124

Date: 9/4/2012

RECEIVED

SEP - 7 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

*Charter fishermen
are commercial —
they are businesses!*

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

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! When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

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! I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

! My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Philip and Laurie Drage

Address: 89051 Welch Road, Astoria OR 97103 (winter)
also Petersburg and Kodiak AK (summer)

Mr. Eric Olsen, Chair
NPFMC
605 West 4th Ave, Ste 306
Anchorage, AK 99501

9/5/12

RECEIVED

SEP - 7 2012

Matthew Marinkovich

M. Marinkovich
P.O. Box 2084
Friday Harbor, WA 98250

360 472 0392

Hello

My name is Matt Marinkovich. I've fished commercially my entire life, and have purchased blocks of 3A + 2c halibut Quota, which I am still paying for via the Federal Loan Program through NMFS.

When I bought that Quota, I fully expected the resource to remain ~~as~~ as a commercial harvest, and not be reallocated to the charter industry. I fish in Puget Sound, and have seen that commercial fishery dwindle as a result of resource reallocation, and I am very concerned about what I see going on with these proposals.

Please keep the 2008 CSP allocations. Please stop giving allocation to the charter fleet above their actual harvest. The charters have been making money lately, the commercial fleet has not. Certainly, I owe more ~~than~~ each year than my Quota earns. (in QS Debt service)

Also, I support the GAF provision. I've invested in my fishery. I don't think it is too outrageous for the charter fleet to invest in their resource as well.

Thank you for considering my viewpoints.

Sincerely



Matthew G MARINKOVICH

RECEIVED

SEP 7 2012

9-4-12

I worked in the Bering
Sea crab fishery for 10
years! Fishing up to 300 days
a year for the chance to
buy my Quota. Now sportcharter
want us to give it to them!

I've work to hard for them
to just take it. In fact they
should pay us for 10 of the 17%
reduction from last year!

Thanks
long time
Mark Bradley

Mark Bradley
#6503
42205 Cty Rd 136
50 Lks MN 56448

Dear; Eric Olson Chair

RECEIVED Sept 1, 2012

SEP - 7 2012

My name KIRIL Z. Basargin born, raised & lived my life Commercial fishing, have been a Commercial fisherman since I wasn't fortunate enough to be allocated Halibut IFA from the NMFS I had to buy in with my own blood & hard work through the years The IFAs I bought have a loan on them, I bought 68'000 lbs of Halibut about 5 years ago, and now have left only 22'000 to date, the Quota has been going down since my Payment isn't covered after Crew, FUEL, BAIT, GEAR, I have to pay my payment by fishing in another industry or work on Construction to pay my bill doesn't make financial sense, And After I work hard on Construction or another fishery to struggle to pay my payment, My family struggles to eat, because I'm working to make a payment.

I'm strongly request that the management would not reallocate commercial interest and/or investments to another group. The CSP allocation set in 2007 SHOULD NOT BE CHANGED Because of political interference the Charter Fleet was gifted 25% over their actual harvest and are trying to increase their allocation by obstructing final regulatory action. Commercial fishermen have lost MONEY at low levels of abundance. The Charter Fleet does not need more halibut at the expense of Commercial IFA fisherman and the communities that depend on Halibut resource.

Let the CHARTER FLEET invest & buy their own quota just like the Commercial IFA HALIBUT FISHERMAN, IF THE CHARTER FLEET CANT AFFORD IT THEN LEASE IT FROM THE COMMERCIAL FISHERMAN, EXACTLY LIKE THE COMMERCIAL FISHERMAN INDUSTRY DOES. THE CHARTER FLEET GETS THERE RESOURCE FREE AND IS MAKING BIG MONEY.

Sincerely,

KIRIL Z. Basargin
P.O. Box 2305
Homer, AK 99603

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-4-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP - 7 2012

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Thank you for the opportunity to comment.

Sincerely,

Name: Tamara Evens Tamara Evens

Address: PO Box 886 Petersburg, AK 99833

★ My husband & I have invested \$176,000 in 2C halibut IFA. Shouldn't the charter fleet have the same opportunity? If they want more, let them buy it. -

RECEIVED

(1) Herman K Davis Sr SEP - 7 2012

I have about \$15,000 invested in
My boat insurance, gear, engine

(3) The CSP allocations set in 2008
should not be changed

I would like to share a
comment with you that one of
these people said, how am I
going to feed my family if
you cut our allocations of
helibut my thought on this
is hey, this guy is paid
already, before he leaves the
dock if I don't catch any-
thing I don't get paid.

I live in this stat called
alaska I help finance it with
the money I make

(over)

Sure, maybe some of the men
that do this kind of work stay
here, but the biggest part of the
money that is made here goes
~~to~~ to the lower 48. Maybe be-
cause ~~of~~ of the amount that the
charter people are taking our
quote has dropped

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name:

R. Ursalovic

Address:

RIC URSALOVIC
P.O. Box 709
Whittier, AK. 99693

Here are some extra comments that I thought you should have:

- a) My original IFA share was reduced 32.77% since introduced,
or
45% reduction since 2008
- b) Several times the charter group from Valdez, AK. send proposals to the ADF&G's board to outlaw commercial fishing for halibut in Prince Williams Sound (my fishing ground). Luckily for us, so far they have been unsuccessful.
- c) Most of the charter vessels now catch 3 to 10 times more halibut than my annual quota; and they don't have to worry about overfishing

R.U.

The Albert Hofstad Family**PO Box 1030****Petersburg, AK 99833**

September 3, 2012

Mr. Eric Olson, Chair North Pacific Fishery Management Council

605 West 4th Ave, Ste 306

Anchorage, AK 99501

Dear Mr. Olson,

We are writing to comment on the Halibut Catch Sharing Plan. We support the catch allocations adopted in 2008 and the comments submitted by the Halibut Coalition, of which we are members.

My husband has been commercial fishing halibut in area 2-C for over 70 years, he holds IFQ's most of which he purchased, I purchased all of my halibut IFQ's (area 2-C), and 3 of our son's purchased all of their Halibut IFQ's (area 2-C). We have well over \$2.5 million dollars invested as a family of fishermen in area 2-C. Our sons are still paying off loans that they cannot even pay the payments on with what they make fishing the IFQ's because of the draconian decline in quota over the past several years. How can you even consider giving away (for free) any more percentage of the quota we purchased (and financed) to the charter fleet? When we purchased quota, we never even considered that the NPFMC would gift part of our life savings to another commercial group.

Please, be fair...

Our family is dep

endent on our income from the halibut fishery and uncompensated reallocation to the charter sector hurts my husband and I, who are retired and have counted on this income to live on. Our son's are still paying for their IFQ's, boats and other permits as well as raising young Alaskan

families. Our coastal communities suffer as well.

The allocation percentages agreed to in 2008 are fair to everyone because they protect the consumer, the charter fleet, our Alaska coastal communities, and provide access for guided anglers at all levels of halibut abundance. In order to be equitable, all sectors must share equally in conservation of halibut. The Catch Sharing Plan allocations set in 2008 SHOULD NOT be changed because of political pressure. The charter fleet was given at no cost to themselves an allocation 25% above their actual harvest twice and is again unfairly trying to increase their allocation.

If charter operators want to catch more fish I support their ability to lease additional quota. Why shouldn't they have to invest if they want more quota? As commercial fishermen we have had to save, borrow and payback huge loans to acquire our quota.

PLEASE, PLEASE get this done with and be fair.

Sincerely,

The Albert Hofstad Family

Albert Hofstad
Melinda Gruening Hofstad
Nathan Gruening
B.Swift Gruening
Larry Hofstad
Mark Hofstad
Nick Hofstad

D. Joyce Skaflestad
P.O. Box 490
Hoonah, Alaska 99829

September 6, 2012

Mr. Eric Olson, Chair
North Pacific Management Council
605 West 4th Ave., Ste 306
Anchorage, AK 99501
RE: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

I support the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

When I received my quota I did not anticipate that the NPMc would reallocate this valuable asset to another commercial group.

The IPHC should be delegated authority

2
to annually set bag and size limits for charters to maintain the charter harvest at or below their allocation; this is the most effective way.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. They should have to invest if they want more quota. I have watched my IFQ's dwindle every year. Uncompensated reallocation to the charter sector is appalling.

Thank you for the opportunity to comment.

Sincerely,

D. Joyce Skaflestad

Joyce Skaflestad

2012 Letter

2 pages

Mr. Eric Olson,

NPFMC

605 West 4th Ave, Ste. 306

Mr. Olson

Re: C-1 Halibut Catch Sharing Plan.

As one of our late President said, "Well here we go again".

First I would like to say I SUPPORT the catch share plan percentage allocations that were adopted in 2008. I urge the council to commit to these allocations.

The 2008 CSP allocations were based on historic and current harvest ratios; these allocations are fair and equitable. The 2008 CSP allocations provide a reasonable level of access for guided anglers at all halibut abundance levels.

Longline fishermen provide Halibut to the public, some 8-to - 9 million AMERICAN consumers that cannot afford a charter; they provide another 2-3 million non-Americans through export. This also helps the national trade deficit.

When I purchased quota, I did with the expectation that the NPFMC after talking this issue over since at least 1996, (see my past testimony attached) would not reallocate my investment in my livelihood to another commercial group.

Do you suppose that for every IFQ holder that has to reallocate to the charter industry that IFQ holder could be allocated a charter license for compensation?

That might be fair and equitable.

Today my IFQ is 1/3 of what I purchased and my income to service my loan is 60% short, and subsidized by other work. I cannot afford to lose anymore.

If charter clients want more fish let them lease the IFQ from me then I can still service my loan, and at the same time the charter client gets more fish.

A question that should be answered is with the consolidation of the charter industry is the commercial fishermen having to reallocate IFQ to just a few who are buying up the charter license and gaining 35.00 dollar a lb. IFQ for free?

What would the GHL be worth if just a handful of investor's owned the entire charter licenses?

Should we require the charter industry to have vessel owner onboard when they fish Halibut just like the commercial guy?

Mr. Olson council members it is time to end this 16 year reallocation. Please stick to the 2008 CSP allocation.

Thank you for the chance to comment.

Bill Connor

Box 1124

Petersburg AK 99833

Bill Connor 9-7-12

1996 Testimony 7 pages

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.

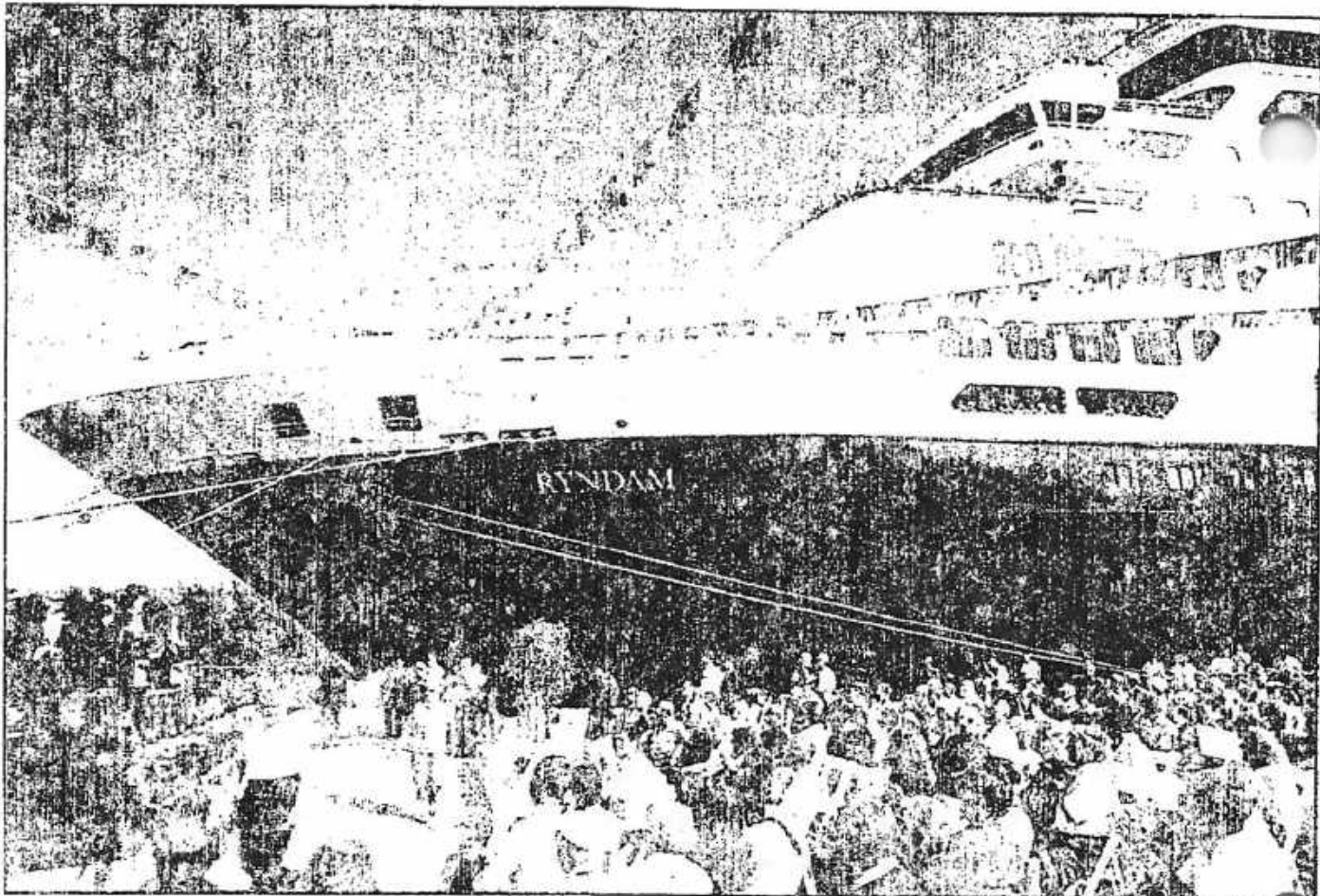
PAGE 6

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.

Bill Connor



CHRISTENING CEREMONY: Holland American Cruise Line's newest ship is the Ryndam, which set sail in Oct. 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 2,000-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 liners are being built in Europe.

That trend is unlikely to change anytime soon.

RECEIVED

SEP - 7 2012

Sept. 6, 2012

Dear Mr. Olsen

I have purchased all of my IFQs at a cost of just under \$400,000.00. If I sold them today at \$30.00 lb. it adds up to \$177,750.00. The loan I have is \$172,400.00 plus interest for this year.

I started out with an 18ft skiff, because the charter sector grew at such a fast pace I needed to go further from town. I had to get a bigger boat and more IFQ's to support the boat. Then between the charters and the lodges I have had to go even further away, there again a bigger boat and more IFQ's. I did this last upgrade when they said we could have a third block to fish. I bought 12,000 lbs. Fished it for one year and lost it before I even had a payment due.

With the rules at the time of purchase we were suppose to have a "fast up and slow down" rule. Where did that go?

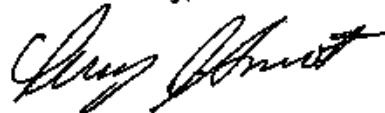
I really had a good business plan, but now it's just a lot of work with little to nothing to show for it!!

All I can say is if the charter sector wants more fish they need to pay for them like the rest of us commercial fishermen. I feel we as commercial fishermen with an investment in the IFQ program should be compensated for our losses! These losses are not of our doing as we followed the rules.

The commercial fishing industry supports our communities. Most of the charters blow into town make a bunch of money and go home. This is our home and we need the money to support us and our community.

I've been battling cancer for these last two years. Two years now I have had to do a medical transfer of my IFQ's. For this I receive enough to pay my loan interest and hopefully my enforcement tax. One question I have is why the charter sector does not have to pay some kind of enforcement tax?

Thank you for listening.
Sincerely,



Terry J. Smith
P.O. Box 991
Petersburg, Ak. 99833
907-518-0218

Subject: Retain 2008 CSP Allocations for Halibut

From: Michelle Connor <connor_michelle@yahoo.com>

Date: 9/9/2012 5:10 PM

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

CC: "halibutcoalition@gmail.com" <halibutcoalition@gmail.com>, "CRFBC@aol.com" <CRFBC@aol.com>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Halibut is an important part of the regular diet my family, friends and I enjoy and rely on.

I believe the current allocation percentages while stewarding the halibut stocks also ensure that I am able to purchase halibut in markets or enjoy it at restaurants. I urge you to maintain historic consumer access at all levels of halibut abundance. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Michelle Connor and Mark Levensky
Seattle, Washington

Subject: access to halibut

From: "Kathleen Connor" <kathleen_connor@comcast.net>

Date: 9/9/2012 7:08 PM

To: <npfmc.comments@noaa.gov>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors.

Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance.

It is important for all sectors to share in conservation of halibut, equally, at all abundance levels.

The CSP allocations set in 2008 SHOULD NOT be changed.

Especially given the opportunities for interests who are late entrants to the fishing markets to gain inappropriate and disruptive control of markets historically controlled "locally" for the benefit of consumers and local economies.

Sincerely,

Kathleen Connor

American Consumer

5829 Gull Harbor Drive NE

Olympia, WA 98506

Subject: Halibut Catch Sharing Plan (CSP)
From: Kellii Wood <kellii2005@gmail.com>
Date: 9/10/2012 8:59 AM
To: npfmc.comments@noaa.gov

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Kellii Wood

American Consumer

Petersburg, AK

Subject: halibut quota slashed
From: jamie griffith <jamiegriffith1@hotmail.com>
Date: 9/10/2012 10:16 AM
To: <npfmc.comments@noaa.gov>

Hello,

My name is Jamie Griffith and I have been involved with the Bartels commercial fishing halibut quota for over 15 years. I am currently a licensed clinical social worker and no longer depend on the income of commercial fishing; however, it allowed me to get the education that I have now. I was fortunate to fish during the years of unlimited quota and helped the Bartels quota to be what originally was over 15,000 pounds. Now unfortunately to cut after cut their quota is only around 3,000 pounds. This is disgustingly unfair at best and a down right criminal at worst. I had high hopes that one day my children would be able to experience the incredible hard and rewarding labor of commercial halibut fishing, and, hopefully help them receive higher education; however, due to the ongoing cuts there probably wont be any quota left when they are old enough to fish. Since I am a past crew member of many years, I am able to take over the Bartels quota and that would have been an honor since I helped build it during the derby days; however, I fear that the charter boats are going to be the ones reaping the benefits of all the hard labor so many commercial fisherman put in to earn their quota. Please re-examine what the state is doing to commercial fishing and the Alaska way of life. If it wasn't for commercial fishing my family and the Bartels family could likely be on welfare. Please do not devastate the commercial halibut quota and begin to consider giving some of the hard earned quota back to the people who worked for it for so many years.

Thank-you for you consideration,

Jamie Griffith, LICSW, PLLC
Former deckhand

Subject: Fw: halibut quota being slashed due to charters
From: jamie griffith <jamiegriffith1@hotmail.com>
Date: 9/10/2012 9:58 AM
To: <npfmc.comments@noaa.gov>

From: [jamie griffith](#)
Sent: Monday, September 10, 2012 10:56 AM
To: [npfmccomments@noaa.gov](#) ; [Rob Griffith](#) ; [Russ and Charleen Bartels](#)
Subject: halibut quota being slashed due to charters

Hello,

My name is Jamie Griffith and I have been involved with the Bartels commercial fishing halibut quota for over 15 years. I am currently a licensed clinical social worker and no longer depend on the income of commercial fishing; however, it allowed me to get the education that I have now. I was fortunate to fish during the years of unlimited quota and helped the Bartels quota to be what originally was over 15,000 pounds. Now unfortunately to cut after cut their quota is only around 3,000 pounds. This is disgustingly unfair at best and a down right criminal at worst. I had high hopes that one day my children would be able to experience the incredible hard and rewarding labor of commercial halibut fishing, and, hopefully help them receive higher education; however, due to the ongoing cuts there probably wont be any quota left when they are old enough to fish. Since I am a past crew member of many years, I am able to take over the Bartels quota and that would have been an honor since I helped build it during the derby days; however, I fear that the charter boats are going to be the ones reaping the benefits of all the hard labor so many commercial fisherman put in to earn their quota. Please re-examine what the state is doing to commercial fishing and the Alaska way of life. If it wasn't for commercial fishing my family and the Bartels family could likely be on welfare. Please do not devastate the commercial halibut quota and begin to consider giving some of the hard earned quota back to the people who worked for it for so many years.

Thank-you for you consideration,

Jamie Griffith, LICSW, PLLC
Former deckhand

Comment —

I don't believe IFQ's should be taken away without being leased or purchased by users. Taking away my fishing shares, is taking away the income of my family and crew.

Any reallocation should be compensated by lease or purchase. Any other way is taking our livelihood.

Ken Smith

From: Margarita Bello <bellomargarita@yahoo.com>

Date: 9/10/2012 6:04 PM

To: npfmc.comments@noaa.gov

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Holly Winje and Family

American Consumer

Petersburg, Alaska

Subject: IMPORTANT INFORMATION re: CSP Allocations

From: Kirsten Curry <kirsten.curry@rpgretirement.com>

Date: 9/10/2012 8:55 PM

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

Dear Mr. Olson and Council Members,

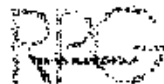
As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels.

The CSP allocations set in 2008 SHOULD NOT be changed!

Best Regards,

Kirsten Curry, President



Rains Plan Group

2226 Eastlake Ave East, #88

Seattle, WA 98102

(206) 430-5084 ext. 7006 (phone)

(800) 974-2814 (toll free)

(888) 796-5478 (fax)

kirsten.curry@rpgretirement.com

www.rainsplangroup.com

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Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: September 5th 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 10 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name: Michael T. Simpson

Michael T. Simpson

Address:

17209 Foothill Avenue Eagle River, AK 99577

RECEIVED

SEP 10 2012

Dear Mr. Olson

I'm Arseny Reutov and I think it is not fair that I worked hard and paid a lot from my own pocket and I'm still paying for my quota share and just getting by. If it is not there's why do they want to take away of the only thing I have left. Why should they made money from our quota shares. Other thing is we longliners loose ~~at~~ a lot and they gain. The CSP allocations set in 2008 should not be changed because of political interference.

September 1, 2012

Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501

RECEIVED

SEP 10 2012

Dear Mr. Olson

Re: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

I understand there is a possibility the council could relocate another 4-5% of the Halibut catch to the charter industry; as a long time halibut longliner I oppose this action.

I DO SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The 2008 allocation percentages are fair because they protect coastal communities, the longline fishery, and provide a reasonable level of access for guided anglers. It is important for all people to share in the conservation of halibut, equally, at all abundance levels. On two occasions the charter fleet was given an allocation 25% above their actual harvest and now again is trying to increase their allocation.

The IPHC should be delegated authority to set limits for the charter, so they can maintain the charter harvest the most effective way. This will then correct previous problems with the charter sector frequently exceeding their allocation.

I also SUPPORT the Guided Angler Fish provision that allows charter operators to lease quotas if they want more fish. They should have to invest if they want more quota just as the setline fishery does.


My family is totally dependent on the income from the halibut setline fishery. Therefore if quotas are relocated it will hurt both my family and my community.

In the past 6 years the commercial fisherman has LOST money and the charter fisherman have made money.

THE CHARTER FLEET DOES NOT NEED MORE HALIBUT AT THE EXPENSE OF COMMERCIAL FISHERMEN, THEIR FAMILIES AND THEIR COMMUNITIES.

Thank-you for the opportunity to comment.

Sincerely,


Jack B. Cartwright
89895 Seales Rd
Warrenton, OR 97146

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date:

9-5-12

RECEIVED

SEP 10 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??


My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.


Thank you for the opportunity to comment.

Sincerely,

Name:

ARIE GRIN 

Address: 12038 CLASIC PLACE BURLINGTON WA 98233

I AM 74 YRS OLD PLEASE DO NOT DO THIS TO MY SON, WHOM IS TRYING TO MAKE A LIVING ON REDUCED CATCHES ALREADY. 

RECEIVED

SEP 10 2012

Dear Mr Olson,

September 4, 2012

Concerning the reallocation of quota to the charters, If the charters desire and require a larger quota they should buy it the same way I got mine. Mine has evaporated from about 10,000 pounds to around 2500 pounds.

To take from me what I have purchased and give it to another without any compensation to me is wrong.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Norman K. Sowards', with a long, wavy horizontal line extending to the right.

Norman K. Sowards

RECEIVED

SEP 10 2012

Dear Mr. Olsen

Please Quit cutting
down my Quata,
when I bought my
Halibut shares, I had
the understanding that
we would keep the lbs
that we paid for.

It was very hard
for us to come up with
the moneys for the shares,
had to mortgage house.
Now you want to take
that away from us
why ????

Please stop this Insanity,
Fair is Fair.

You want to Fish,
then you should
BUY the shares
NOT!! a i repeat
Not!! be given a Freebie
from someone elses Hard
work & Hard earned money.

Thank You

Sincerely

Peto Kaluzia

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/8/12

RECEIVED

SEP 10 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: JACK HUGHES of Alaska F/V Smoky Bay

Address: PO Box 1401 Crested Butte Co 81224

I'd like to see the dragees give up a little more of there by-catch also.

W. D. Field
P.O. Box 210953
Huke Bay, Alaska 99821
wdfield@gei.net

RECEIVED
SEP 10 2012

September 5, 2012

Dear Sir;

I writing this letter, I will be polite however, you may consider I am expressing an extreme emotion !

I am fed up with the charter operators actions in dealing with the catching of Halibut.

For the past several years they have ignored the guidelines that have been set and, by their actions, shown a gross disregard for the management of the stocks. In my mind this shows a high degree of disrespect for the system that we all need to work with in. They are a commercial enterprise selling a service to the public. Just as I catch fish and sell them to the public.

The sharing plan set out in 2008 was a reasonable option but they have continued to whine for more while not following the guide lines that were established in their favor.

If they want to catch more fish, they can do what I can do, and that is to purchase quota. Do not give them any more of my quota! I have watched my quota share decrease to the point that I have no hope of supporting my family on this one resource. I am forced by the economics of the market to find other sources of income. I was supportive of this because I thought that I was helping the stocks to recover to the point of sustainability. A point I have not yet seen.

I strongly support a log book entry system for the charter fleet. I have to deal with this on ever trip and it may help to verify catch and bycatch.

Fish and game needs to make verification inspections just as they do for my operations.

Sincerely,

William D. Field



UT WEST 4TH AVE 5TH 306 Q1712
505 WEST 4TH AVE 5TH 306 Q1712

DEAR MR. DESSON

I SUPPORT THE CAJTECH

SHARING PLAN ALLOCATIONS

ADOPTED IN 2008.

I HAVE 3 BLOCKS OF

IFER. I AM STILL MAKING

PAYMENTS ON MY ~~RECEIVED~~

LOAN FOR IFER.

I SUPPORT LEASING IFER

TO UNTRUSTED OPERATORS

I DO NOT SUPPORT

ALLOCATING MORE

CREDIT FROM DONOR LIKE

TO CHARITEL.

I PRC SHOULD CONTINUE

TO MANAGE THE TRAILBL

RESOURCES, MAJOR ISSUES

NO PAMAN HINDGES
HAINES, AIC

RECEIVED
SEP 10 2012

US BANK NOTES

PO BOX 1036

HAINES, AK 99827

STAFF SOURCE @ YAHOO.COM

Chairman and council members,

RECEIVED

SEP 10 2012

My name is Lucas Skordahl and I am 29 years old. I have been a commercial longliner for the past 15 years. When I was 16, my dad recommended I buy some Halibut quota. At the time I didn't know exactly what I was getting into, but my dad, Jay Skordahl, convinced me it was a good investment. Since then I have ~~learned~~ purchased several other pieces of area 2C and 3A Halibut, and still owe over \$100,000.00 on my investment.

I understand and agree with a decrease in my quota due to a decrease in Halibut stock. ~~BUT~~ However, it is insulting to think that my investment may be allocated to the charter fleet.

I think the CSP allocation set in 2008 should NOT be changed. If the charter guys want more Quota they should have to invest in it just like me.

Earlier I mentioned how I am willing to take a cut in my quota to preserve the resource for ~~for~~ all of our future. Let me end with a question. Have you ever heard a charter sector testimony with that same mentality, or do they just want MORE FISH!!!

Thank you,

Lucas Skordahl

September 4, 2012

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

RECEIVED
SEP 10 2012

Dear Mr. Olson,

I am writing this letter in response to the Council's intent to revisit its Catch Sharing Plan from the October 2008 meeting.

I am a 29 year old commercial halibut fisherman who has invested twice in the halibut IFQ program. I believe the CSP allocation set in 2008 is more than fair, and that gifting more revenue/resource to another business at My expense would be highly unfair. I support the actions/allocations adopted in 2008, and am hopeful the Council decides against the charter industries proposals to be awarded a bigger portion of My quota. If the charter industry feels the need for growth, then They should have to invest in the fishery like the rest of Us (Guided Angler Fish provision).

Thank you for taking the time to hear My concerns.

Sincerely,

Jeffrey Blankenship

1709 Halibut Point Road #12

Sitka, AK 99835

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: SEPT. 9, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 10 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: ROBERT BELL & DEBRA PAGE

Address: BOX 115 ELFIN COVE AK 99825

DEBRA, OUR SON RYLAND, AND I ALL OWN IFQ HALIBUT SHARES
WE'VE SEEN OUR SHARES SLASHED TO PALE JACK THE RIPPER.
ENOUGH ALREADY!

SINCERELY,
Robby B

950 - (206) 200-9111

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: SEPT 5 / 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
805 West 4th Ave, Ste 308
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

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The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name:

James A. Skarvow (HIASKANSEAN@aol.com)

Address:

755 Capital View apt
000913 AK 99824

P.S. I Am underwater by the Big 4 year cuts here in Southeast Alaska Area 2c. By \$140,000!! This is icing on the cake. were Ding Here !?!

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 8-31-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Jim FRARY

Address: P.O. Box 1019, Homer AK 99603

I'm having trouble paying payments on my IFQ for Halibut please. Leave percentages as they are - Jim Frary

September 3, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 7 6 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—by orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

As a boat owner/operator, I was initially allocated quota. However, with declining stocks and re-distribution it has been necessary to continue purchasing quota shares in order to increase my allowable catch and continue commercial fishing. Over 71% of my halibut shares have been purchased. When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector

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SEP - 6 2012

Mr. Eric Olson, Chair

Page 2

September 3, 2012

hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The

charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. **Why shouldn't they have to invest if they want more quota?? I have.**

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. **What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase.**

Thank you for the opportunity to comment.

Sincerely,



Steve Russell

3152 Woody Way Loop, Kodiak AK 99615

September 3, 2012

RECEIVED
SEP - 6 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

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Longline fishermen bring the fish to the public; charter operators take the public to the fish—by orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

As a crewmember, 100% of my 3A halibut shares have been purchased. When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The

Mr. Eric Olson, Chair

Page 2

September 3, 2012

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SEP - 6 2012

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I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. **What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase.**

Thank you for the opportunity to comment.

Sincerely,



Susan Russell

3152 Woody Way Loop, Kodiak AK 99615

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: Sept. 5 2012

RECEIVED

SEP 10 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

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The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota?

dependent
I am *dependent* on income from the halibut setline fishery and uncompensated reallocation of charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them. *(over more comments)* →

Thank you for the opportunity to comment.

Sincerely,

DJ Gallacher
Name: Daniel J. Gallacher

Address:

341 N. Shore Blvd. Fox Island WA. 98333

* Comment:

I purchased quota shares two years ago in good faith and with faith in the system of management of the resource for sustainability. Immediately my quota shares were cut by 45% the next year. I never did get to harvest the amount that I purchased. Now I understand the Chautauque Industry wants to be bonded 4-5% of the Quota Shares. Why would you let that happen. I understand the need to cut the quota for the sake of the fish but why at the expense of the hard working commercial fisherman who has stepped up and paid the price would you remove quota shares from them and give them to someone who hasn't earned them. I opposed that type of change and I hope you honor the faith we have in the system to be fair to all.

Don Gallacher

Subject:

From: Byrer Family <voltagehog@hotmail.com>

Date: 9/11/2012 7:40 AM

To: <npfmc.comments@noaa.gov>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Brad & Sondra Byrer
American Consumer
PO Box 2035
Petersburg, Alaska 99833

Subject: halibut allocation

From: Seager Quentin <quanseam@msn.com>

Date: 9/11/2012 8:48 AM

To: <npfmc.comments@noaa.gov>

September 11, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 W. 4th AVE, Ste 306
Anchorage, AK. 99501

Dear Mr. Olson.

Re Halibut Catch Sharing Plan (CSP)

A note to all the public servants considering reallocation of our shares:

We the "commercial fishers", provide and supply the halibut consumed by the general public. All public servants' duty is to the general public, not recreational desires of a very few. Being a commercial halibut fisherman since the early 1980's, I watched the charter group grow from a fraction of what it is today. The charter GHL was a very small consideration. This group has been allowed to grow at the expense of the resource and at the expense of the commercial fleet whose history is long, established and feeds the general public. If you believe the charters are supposed to take from the longline fleet, who do the longline fleet take from-the predators of the sea? Whose interests are you serving? Is it the GENERAL public? You, the public servants hopefully understand you serve and make decisions for the public. Please uphold the 2008 CSP.

Sincerely
Quentin Seager
commercial fisherman for 41 years

Eric V. Parker
PO Box 1424
Sitka, AK 99835
(907) 747-5564
evparker58@gmail.com

September 11, 2012

North Pacific Fishery Management Council
605 West 4th Ave
Ste 306
Anchorage, AK 99501

Attn: Eric Olson, Chairman

Dear sir:

I applaud your efforts to make a stand on behalf of the commercial halibut fishing industry. I hate being pessimistic about achieving any favorable outcome against the charter fishers. They have many more people involved, more money to spend lobbying and the support of local and state politicians. Because of the monies they generate in our economy, it does not matter how much money the commercial fleet have invested in the IFQ program; a program promised to safeguard the resource and the interests of the commercial industry.

Money has a way of corrupting what initially seemed like a good thing. Since IFQs were implemented we've fought the charter expansion, their reluctance to conserve in times of low resource abundance and their insatiable greed to take more quota for themselves. If charter fishers want more halibut they should reduce their fleet size. The leasing of IFQs is not the answer in my opinion and giving them any more of our quota is wrong.

In the end charters will win concessions and the halibut fleet will lose. It's called "the golden rule": those with the gold make the rules and sir, I have no gold! As I've had to purchase my IFQs, I have only debt and that I would be glad to share. All the same I wish you good luck.

Sincerely,

Eric Parker

Life long commercial fisherman

RECEIVED

SEP 11 2012

Chairman Eric Olsen and other members of the NPFMC,

My name is Carter Hughes and I am a salmon troller that possesses a small amount of halibut quota in area 2C. I have been in the in the Alaska fishing industry since 1984 and operating my current vessel since 1994. I purchased halibut quota share in 1995 so that I could continue to make an income from the fishery after the implementation of the IFQ system, as there was no credit given to people that crewed during the qualifying years. I currently have a little over 1000 pounds of 2C halibut and find myself in the difficult situation of being squeezed by NMFS and NPFMC policy agendas that reallocate halibut to both the charter and trawl sectors while increasing financial burdens with extra costs such as the observer program and electronic monitoring. How do you people expect me and other small operators to support all these new requirements if you're going to continue reallocating halibut to the charter sector?

I have attended many of the NPFMC meetings that have dealt with the halibut allocation issue since 2001 and seen many workable solutions supposedly finalized. I have seen at least 2 reallocations to compensate the charter fleet for their GHL overage. This is now just stonewalling. No body gave me anything, I had to buy it and now the current alternatives you are considering just bleed me from both ends. If you don't want small boat fisherman in the business then why don't you folks just come out of the closet and say it. It's absurd that a further reallocation discussion is still continuing. My income is going down, the charter sector's is not. Do the math; maybe the charter sector should pay for the observer program. What do you expect others and me like me to do at this point? If you really care at all about small, non-corporate commercial fishing operations and their families and communities you'll implement the 2008 harvest sharing plan with out anymore reallocation shenanigans.

James C. Hughes
F.V. Radio
Sitka

Sept 5, 2012

RECEIVED

SEP 11 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th, Ste 306
Anchorage, AK 99501

Dear Mr. Olson

Re: Halibut Catch Sharing Plan

I hear the commercial longline halibut fishermen could have ~~one~~ some of our fish allocated to the charter boats. I personally am doing OK.

I have a grandson that bought halibut quota 2 years ago. His quota has dropped so much that it is real tough for him to make his payment. I doesn't seem fair that some of his quota should be given to the charter boats. The charter boats are commercial fishermen just like I am. Why should quota be given to another group?

Sincerely,

Otis Marsh Otis Marsh
P.O. Box 606
Petersburg, AK 99833

Subject: Halibut Allocation

From: Doug Riemer <nordicair@gci.net>

Date: 9/12/2012 2:58 PM

To: npfmc.comments@noaa.gov

CC: Kathi/Doug Riemer <nordicair@gci.net>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants. The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Doug Riemer

Nordic Air, LLC.
907 772 3535 office
907 518 0244 cell
nordicair@gci.net

Subject: Halibut Allocation
From: kathi riemer <riemer@hotmai.com>
Date: 9/12/2012 2:56 PM
To: <n timer@noaa.gov>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Kathi Riemer

American Consumer

Petersburg, Alaska

RECEIVED

SEP 12 2012

9/7/12

Dear Mr Okon + Council members:

It seems endless to me the letters I have written over the years in support of the commercial halibut fishery - at times it seems as though the end will only come when all commercial quota is reallocated to the Charter and sport fishermen - a sad ending for a fishery with such a long history and participation by real fishermen who love the work they do.

My family started our modest involvement in 1976 to supplement our earnings in other fisheries. I loved the fishery - we continued through the tough derby years, then saved (never borrowed) to buy a few more pounds - realizing that with careful management the future looked good - then came the massive Charter industry and the need to compromise but not

2

We hoped to reallocate as seems to be happening today. Today both a son and daughter fish their pounds and mine (A shares) - my son is underwater like so many others after purchasing 3A shares a few years ago.

IT is especially sad to know so many young crew members who purchased their own lbs. are caught in this mess.

I fully support reductions to manage the fishery for the fishery but not to reallocate to a different user group. Keep a great fishery alive with a fair decision please.

Sincerely

Amy Johnson

AMY JOHNSON
423 VERSTOVIA
SITKA AK 99835

Date:

9/10/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 12 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF)

provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name:

Morgan Dowd

Address:

Box 6507

SITKA AK 99835

COBEYE@AOL.COM

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: _____

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 12 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: _____

Paul J Canik

Address: N16733 Venz Rd Butternut, wis, 54514

When I purchased my Halibut permit I didn't think part of it could be taken away. Why should the charter fleet be entitled to part of my permit.

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 8 September 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 12 2012

Dear Mr. Olson,

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I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

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Thank you for the opportunity to comment.

Sincerely,

Name: John M. Straight (Mickey)

Address: Box 1133

Petersburg Alaska, 99833

P.S. I've invested in 2CD Halibut and my two sons Casey & Kyle have also. were very disappointed with the reallocation of a utilized resource.

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/8/2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 12 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

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My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Kyle Knight

Address: Box 133
Petersonburg Alaska 99833

P.S. I fish my 2CD Halibut (what's left of it?) with my dad. I just finished my college education and now fish Alaska Fisheries Full time. There is enough uncertainty to fishing are ridiculous. It seems very unfair to reallocated and already utilized resource

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/8/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 12 2012

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Thank you for the opportunity to comment.

Sincerely,

Name: Casey Knight

Address: Box 1133
Peperstoune, Alaska 99833

P.S. I've just finished the 2012 salmon season. Heading back to finish my last semester of college. I've invested in Alaska Fisheries, 200 Halibut being part of my portfolio, & fish w/ my dad. Seems very unfair the reallocation of Halibut.

H. MR. ERIC OLSON chair North Pacific Fishery
Management Council.

my name is

Fedor Kuzmin 9-6-12

RECEIVED

SEP 12 2012

I made investment in the
Halibut Fisheries and I am
underwater on my loans right now,
my expectation that the management system
would not reallocate those investments to another
group.

The CSP Allocations set in 2008 'Should Not'
be changed because of political interference.

The charter fleet was gifted an allocation 25%
above their actual harvest on two occasions and is
again trying to increase their allocation by obstructing
final regulatory action.

The CSP supplemental analysis establishes that
commercial fishermen have 'lost' money over the
past six years while charter operators have 'made'
money at this low levels of abundance. The
charter fleet does not need more halibut at the
expense of commercial fishermen and the communities
that depend on them.

YOUR support for the Guided Angler Fish provision
that allows charter operators to lease quota
if their clients want more fish, why shouldn't
charter operators invest if they want more
quota?? we do! Thank you, sincerely,

Fedor Kuzmin 9-6-12

9/10/2012

RECEIVED

SEP 12 2012

North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Sirs,

My name is Steve Merritt and I live in Craig Alaska. I am a 45 year Alaskan resident and I am solely supported by commercial fishing. I was awarded a halibut IFQ when the original IFQ program was implemented.

The halibut resource is not unlike any of the other resources the United States has dispersed amongst its countrymen. From mining claims, water rights, to land allotments, there has always been a procedure for dispersing the resource at first and a system to exchange the resource within after that dispersal.

The halibut resource should not be treated any differently than that of other resources and the only possibility to have treated it differently, was forfeited, when this council approved the original IFQ program. From that moment on, the IFQ program and the halibut became identical to the Homestead Act and the dispersal of land lots.

Which is why I, an IFQ recipient, am so shocked and disappointed in how the halibut resource has since been managed. The thought, that a fellow citizen could just take a section of homesteaded land from the original owner, with government approval, is absurd. This is considered ethically wrong and there are laws in our constitution that forbid it. If our government had allowed this to happen with homestead allotments, it would have resulted in internal factions and feuds that would have made the Hatfield and McCoy's look like child's play.

Yet this council and other influential entities involved in the management of the halibut resource have basically done just that to the Alaskan IFQ holders. Twice after IFQ implementation, they have had halibut quota shares TAKEN away from them and reallocated to the charter sector without compensation or their approval!!

I ask you to STOP this unethical treatment of the Alaskan commercial fishermen in this matter and to look your country's resource history for guidance on how to disperse/manage the halibut resource. The commercial fisherman was allotted his IFQ, just as the original homesteader was allotted his 160 acres. Please treat him accordingly. He is entitled to the same rights given to our forefathers who received homestead land and settle this country!!

For the above reasons, the CSP allocations set in 2008 SHOULD NOT be changed and if it is to be changed, it should be lowered to the levels set in 1995, because that is when the STEALING began. You can not expect these two groups to harmoniously exist together side by side, if you continue to take quota shares from commercial fishermen, and then reallocate them to the charter fleet without securing the approval from the original IFQ recipient. It is fundamentally wrong to continue this.

To promote the harmonious exchange of the halibut resource just as the other resources have been historically managed in this country, the Guided Angler Fish provision should be implemented. As if a piece of land, mining claim or water rights being bought or leased, quota shares will then have a legitimate exchange system. This in turn, will promote the peaceful existence of the parties involved. Anything short of that will be considered ethically wrong and the feud will continue.

My quota is not a large one and the past cuts have left me in an economic dilemma. It takes a substantial investment to go catch these fish and it is getting to the point that the smallest decrease in my poundage will render my quota unfeasible to harvest. Consider fisherman in my situation when you attempt to rationalize giving the charter sector another 4 to 5 percent of my quota. It seems that the people like me on the lower end of the poundage spectrum, are forgotten when these decisions are made, yet these decisions affected us the most!

So in closing I ask that you consider the following in your decisions.

1. The laws of your own county and its history in the dispersal and exchange of other resources. The halibut is no different from those resources.

2. Will the results of your decision promote a peaceful relationship between these parties in the future or will you allow this unhealthy civil unrest to continue?
3. Who the shift of more quota share to the charter sector will affect the most if you so choose to do so?

Sincerely, Steve Merritt F/V C'est La Vie

Steve Merritt
Box 1138
Craig, AK 99921

A handwritten signature in cursive script that reads "Steve Merritt". The signature is written in dark ink and is positioned centrally on the page.

RECEIVED 9/6/12

SEP 12 2012

I TERRY E. WILTA WANT WHAT IS PAID FOR BOTH COMMERCIAL AND THE CHARTER FLEET. BECAUSE I'M INVESTED IN BOTH.

I'VE LOST ABOUT $\frac{2}{3}$ OF MY INCOME FROM THE COMMERCIAL SIDE AND AM ALSO GETTING HOSES ON THE 2C SIZE LIMIT ON THE CHARTERING.

WHILE SELF GUIDED SKIFFS AND 3A CAN GET 2 A DAY ANY SIZE. I'VE LOST BUSINESS CHARTERING BECAUSE OF THIS.

I THINK ALL FISH SHOULD BE RECEIVED OVER 100 POUNDS AND ONE FISH A DAY SHOULD BE THE SAME FOR ALL INVOLVED. THE CHARTER FISHERY DOESN'T NEED MORE FISH, BUT NEED TO MAKE IT EQUAL FOR ALL INVOLVED.

I'VE DONATED. HOPE IT WILL HELP AND KEEP ME POSTED.

SORRY IT COSTS TOO MUCH TO FLY IN + OUT OF PELICAN TO MAKE THE MEETING IN ANCHORAGE.

CHICOB I CHARTERS
TERRY'S MARINE REPAIR
WISANSKI OIL SERVICE
COMMERCIAL HALIBUT

Terry Wilta
TERRY E. WILTA
OWNER OF ALL

Bill Burk
2041 Olympic Drive
Anchorage, Alaska 99515
907.522.3471

RECEIVED
SEP 13 2012

September 4, 2012

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

Re: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

Reallocating 4-5% of my Halibut quota to the charter operators is not fair to the commercial fishermen that have paid to purchase quota's, as myself, for living income.

In 2006, I went in debt, in order to purchase more quota's. In order to get a loan to purchase 21,000 pounds of halibut quota's I had to use my home, my fishing boat and quota's as collateral to get bank financing. 2008 I went in more debt in order to purchase more quota's. I am currently in debt paying loans for halibut quota's.

Charter boat owners/operators can purchase quota's as I did, use everything they own as collateral. No FREE B'S.

Commercial fisherman have lost quota's the past years. 2010 I was cut down 9 ¾ %. 2011 I was cut down 25 ¼ %. 2012 I was cut down 26%. These lost quota's are acceptable in order to prevent the over fishing in certain areas. I can accept that. Although if I am still paying off loans for Halibut quota's that I purchased, reallocating to the charters boat/owner operator is not fair to the commercial fisherman currently in debt and rely on this income for their living income.

Please include myself, Bill Burk, on October 4th, to testify. Thank you for the opportunity to comment regarding this issue.

Bill Burk
2041 Olympic Dr.
Anchorage, AK 99515



Dear Mr. Olson,

I support the 2008 CSP allocations. The percentages adopted there are more than fair to the charter folks. Since it's an international fishery with Canada and charter gets 13% of the quota in 2B, Alaska charter people should be jumping with joy with the 2008 allocations.

If they want more fish than that, they can lease more from commercial guys under the Guided Angler Fish provision. Then maybe I can make a decent buck again after losing 75% of my small quota while the charter blitzkrieg was occurring. And the fish were overharvested.

In the interests of conservation of the resource and clarity for everyone, let's set some permanent rules here. These ones from 2008 are acceptable to commercial interests and are generous to charter interests. It's gone on too long and the fish are paying.

RECEIVED

SEP 19 2012

Sincerely,

Paul N Johnson
Sitka, Ak.

P.S. I love the idea of charter fishing. It is a good thing to take people out and catch them some fish. But just like IFQs or salmon limited entry, it can't be come one come all forever because the fish disappear.

Date: September 11, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 13 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP. It is time we all move on, looking to the future health of the species.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. Why create inequality in a systems that demands all user groups commitment?

Commercial halibut fishing is a business and needs to be respected as such. Just as the charter operators are demanding profitability in their sector, so do commercial operators need to meet their financial obligations to survive. When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. Without a positive cash flow, how can any business expect to survive? The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase and maintain. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Jason Kohlase

Juneau, Alaska

September 10, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 13 2012

Dear Chairman Olson,

This letters concerns the possible changing of the catch sharing plan percentage for halibut allocation that will be on the table during the October North Pacific Fishery Management Council meeting.

I am a Area 2C commercial halibut fisherman and don't think you need to be reminded of how much the harvest has been cut in that area over the last few years. This loss directly affects my pocket book, which means less can be spent at businesses or for services used locally and nationally. But in the name of conservation of the stock, one has to sacrifice so there will be fish to catch in the future.

This conservation mentality does not seem to be what the commercial charter fishing community has in mind. They refused to accept the IPHC recommendation to cut their catch and used political action at a national level to get a better deal. This was during a time when their catches had been exceeding the allocation percentage given to them by the catch sharing plan that was adopted by the council in 2008. Overriding the IPHC did not satisfy them and now they would like to increase their halibut catch by taking allocation from the longline commercial sector instead of waiting for the resource to rebound, which would allow all user groups a few more fish to harvest.

Robbing Peter to pay Paul is not acceptable fisheries management. All user groups should bite the bullet and sacrifice for the sake of the resource. Yes, it is a tough pill to swallow and there will be those whose businesses will suffer greatly. My income from catching halibut in area 2C has decreased over 60% since the conservation measures were started. How many halibut charter fishermen can prove this amount of monetary loss during the same period?

I urge you and the other council members to listen carefully to the arguments for the proposed changes and not be swayed by greed or national organized pressure. The resource needs to be protected and managed for the future with all parties sharing equally in the sacrifice. By doing so the rewards would benefit all halibut fishermen and should be something one is proud of as a participant in the recovery.

Thank you for this opportunity to comment.

Sincerely,



Mr. Mike Allen
PO Box 211122
Auke Bay, Ak 99821

Halibut Catch Share Adjustment- leave allocations alone please

Subject: Halibut Catch Share Adjustment- leave allocations alone please

From: "Reid Ten Kley" <reid@redsalmon.com>

Date: 9/14/2012 4:47 PM

To: <npfmc.comments@noaa.gov>

Please don't re-allocate catch shares from the commercial fleet to the recreational fleet. My family LOVES to eat halibut, but with less harvested commercially prices for consumers like us will increase.

Thank you,

Reid

Reid Ten Kley, CPA | Fisherman

Iliamna Fish Co. LLC

503.880.9170 -direct

www.redsalmon.com

14 September 2012

VIA US MAIL & NPFMC.COMMENTS@NOAA.GOV

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

RECEIVED
SEP 14 2012

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

My name is Charles E. Wood. I have been an Alaska resident since December 1954, and a commercial halibut longliner in Area 2C since 1982.

As a direct result of North Pacific Fishery Management Council (Council) action, longliners went from a free market, open access fishery to the mandatory and highly regulated Individual Fishing Quota (IFQ) Program, where my qualifying years had insufficient production to support my expanded fishing business. The Council, in essence, forced me to buy halibut quota at the Fair Market Value at the time, or fail in my business.

I borrowed \$120,000 at 7½% interest from the Federal IFQ Loan Program, and along with another \$95,000 from the sale of blocked halibut as a downpayment, bought unblocked halibut IFQs in an attempt to stay solvent. My entire fishing business portfolio including my boat, troll permit, originally issued IFQs, as well as the IFQs I was attempting to buy that included my 42% down payment, were tied up as collateral, that far exceeded the total value of my \$215,000 IFQ acquisition.

Ultimately, by last season (2011), I had lost my entire investment in halibut IFQs as well as some of my original quota share because of 2C quota cuts for conservation and to compensate for the years of unchecked overfishing of their Guideline Harvest Levels (GHL) by the charter sector.

In my view, the Council will fail to prevent ongoing substantial harmful socioeconomic affects to longliners if it enjoins the proposed 4-5% from the only sector that has truly participated in halibut conservation, and has actually purchased access to the halibut resource on the open market, access that came at great personal expense above and beyond merely buying a boat and a few sport rods. I fail to see where the Council has any reasonable rationale for implementation of what can only be described as a "taking" from one group of fishermen (longliners) for the benefit of another gear group (charter operators). If the Council chooses this option, then the United States Government should have the obligation to reimburse, in full, the longliners who bought into the IFQ Program in good faith.

My suggestion is to enact regulations which will allow the charter sector to either buy their way in if they need more halibut, in the same way that I, and hundreds of other longliners have had to do, or lease more poundage instead of merely "taking" from longliners, by adopting the Guided Angler Fish (GAF) provision. This would effectively end the "halibut wars" by creating a viable means for charter operators to expand their business without endless Council action and political activism, and would no longer unfairly penalize longliners through what to me is nothing less than Government garnishment, confiscation, and impoundment of my capital investments.

Thank you for this opportunity to express my views.

Respectfully,

/s/

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

cc: President Barack Obama
Rebecca Blank, Acting Secretary of Commerce
Jane Lubchenco, Under Secretary, National Oceanic and
Oceanographic Administration
Senator Lisa Murkowski
Senator Mark Begich
Representative Don Young
Governor Sean Parnell
Petersburg Vessel Owners Association
halibutcoalition@gmail.org

RECEIVED

SEP 14 2012

to whom it may concern,

I have been a commercial fisherman in Yakutat for 27 years, this little community is my home, I have raised 3 sons and 1 daughter here. They all are commercial fishermen. I personally financed \$250,000 to buy ~~my~~ my sons and daughter Halibut Quota, and another \$110,000 to buy it for myself. I did so with good faith that the DFO's I was purchasing would not be given to another user group.

This is an extremely important part of ~~my~~ my income, and my families income. Our community of 700 people has lost 200 people since the 2000 census. This is a vital part of ~~us~~ being able to stay in a small community like Yakutat.

Please do not tamper with the CSP allocations that were set in 2008.

through the CSP's own supplementary analysis, they have shown that commercial fishermen are losing money at these low levels of abundance, while charter operators are making money.

back →

RECEIVED

SEP 3 1972

I support Guided Angler fish provision that gives charter operators the ability to lease quota.

Please consider carefully this proposal, my investment into my families future is in your hands

Sincerely, Leo Holm

[Faint, mostly illegible handwritten text, possibly bleed-through from the reverse side of the page.]

[Faint, mostly illegible handwritten text, possibly bleed-through from the reverse side of the page.]

Randal Henderson
P.O. Box 1125, Petersburg, AK 99833
Phone (907) 723-5245
Email: wn.randy@gmail.com

RECEIVED
SEP 14 2012

To: Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501

Re: Halibut Catch Share Plan (CSP)

Dear Mr. Olson,

I SUPPORT the catch sharing plan as it was adopted in 2008, along with the original percentage allocations adopted then. I urge the council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The charter fleet was gifted allocations of 25% above their actual harvest on two separate occasions and should not be gifted yet more at the expense of the commercial fleet through political interference.

The 2008 CSP allocations were based on historic harvest ratios between charter and longline sectors. This allocation fairly shares the resource between these sectors while providing a reasonable level of access at all levels of abundance.

I have been a commercial fisherman from Petersburg for 35 years. The decision to purchase halibut quota was made as a family decision to help support my wife and children. This was a huge financial commitment for me and my family. It was made knowing that annual fluctuation of pounds to protect the stocks would occur. However I never expected that some of my investment would be reallocated to another gear group with no compensation to me for my investment.

I would very much like to put this battle to rest without causing myself, my family and my community any further damage. It's time to bring the charter fleet into the world of shared resource management, and if their businesses wish to grow allow them to on the open market, as I did, with the ability to purchase or lease additional quota shares.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation of my purchased halibut quota that I have worked hard for. **DO NOT GIVE MY HALIBUT QUOTA SHARE AWAY TO ANOTHER INDIVIDUAL!**

Thank you,
Randal L. Henderson



9/12/2012

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-9-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 14 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Mike McKenzie

Address: P.O. Box 66, Metairie, WA 99152

I have been fishing Halibut since 1997, I was not grandfathered in because I missed the deadline by 1 year. So because I have been paying for my IFA's for all these years I honestly can not afford to lose even 1 more pound!

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 12 SEPT 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 14 2012

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Thank you for the opportunity to comment.

Sincerely,

Name: THELTON REAR 

Address: 1007 H.P.R. SITKA, AK 99835

REALLOCATION IS A FANCY WORD FOR THEFT, AND
I FIND IT OFFENSIVE AND UNACCEPTABLE!



Subject: FW: (no subject)

From: Peter Evich <peter.evich@kpc.com>

Date: 9/17/2012 8:14 AM

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

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Peter Evich

Edmonds Washington

Subject: Urgent Request - Halibut

From: Catherine Haag <catherinehaag@gmail.com>

Date: 9/17/2012 8:18 AM

To: npfmc.comments@noaa.gov

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Catherine Haag
American Consumer
Olympia, WA

Subject: Halibut

From: Roger Tellman <rogertellman@earthlink.net>

Date: 9/17/2012 11:33 AM

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

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Roger Tellman
American Consumer
Eugene, MO 65032

Sent from my iPhone

Halibut

Subject: Halibut

From: Captain <seakcharters@gmail.com>

Date: 9/17/2012 9:31 AM

To: npfmc.comments@noaa.gov

Dear Mr. Olsen and council members:

Please do not change the 2008 CSP. As a retired commercial fisherman,(72 years old) I still enjoy obtaining Halibut to eat. My family also prefers it over any other fish. Thanks,

John Svensson
Kalama, WA 98625

--
jas

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-12-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 17 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: David Bray

Address: 3814 BARANOF AVENUE
KETCHIKAN, AK. 99901

P.S. This is an unfair allocation at
the expense of commercial fishermen

Subject: oct meeting charter halibut

From: Carolyn Nichols <carenichols@hotmail.com>

Date: 9/17/2012 10:05 PM

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

I feel that the charter fleet ABSOLUTELY does NOT need to take any more fish from the commercial fleet. They have taken and taken and taken and they are unsatisfiable. The longline fleet should not be made to pay for the charter fleets demands any more. The charter fleet should step up to the plate and practice responsible management and conservation of the resource as well as plain old respect for the other users of this amazing resource. I have been in the commercial halibut fishery for 28 years. The NPFMC has not been able to stop this reallocation - and I am not really sure why- other than there is too much posturing and delaying and hemming and hawing - so nothing gets done.

Please stop this reallocation and get some hard fast rules and allocations for the charter fleet in place and do NOT reallocate any more fish to the charter fleet from the commercial longline fleet.

It is so way overdue It is ridiculous.

thank YOu

Carolyn Nichols

111 Knutson Drive

Sitka, AK 99835

Subject: Halibut CSP Comments
From: Luke Fanning <fanning.luke@gmail.com>
Date: 9/17/2012 10:19 PM
To: npfmc.comments@noaa.gov

Mr. Eric Olson, Chair

North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

I have personally invested over \$100,000 of my life savings in the halibut fishery, and I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. I had to buy every pound of quota I have.

I also support the guided angler fish provision that allows charters a mechanism to catch more fish. If they want a greater share of the resource, then they should have to pay for it--Just like I do. Commercial charters cannot be allowed to overfish their allocation (or have their allocation increased) at the expense of fishermen who diligently invested into what we thought would be an equitably managed fishery.

My family is dependent on income from the halibut longline fishery, and we have already taken many cuts to our catch that we cannot sustain any more. Many fishermen in our area are underwater on their loans, and have mortgaged their homes to purchase quota. Those fishermen have already lost so much, it is unfair to continue to re-allocate more and more fish from the commercial setline fishery to the commercial charter sector.

Commercial charter fishermen and commercial setline fishermen should both have to play by the same rules: If a charter wants to catch more than their allocation, then they should have to buy in---Just like I do.

Thank you for your consideration and your service to this fishery.

Sincerely,

Luke Fanning
F/V Kelsie Dawn
Juneau, Alaska 99801

I bought Halibut IFQ's several years ago since the initial amount I earned was very small. I applied for a NOAA loan, so I could increase the amount of Halibut I could harvest. I took out a 20 yr loan that is about half paid off. I still owe thousands of dollars.

I never thought my shares would be reallocated to the charter fishery as they already have.

The CSP allocations set in 2008 should not be changed because of political involvement. Let the charter operators invest in the Halibut fishery if they want more quota, like I have done.

Sincerely

Ken F. Jani

RECEIVED

SEP 17 2012

September 14, 2012

MR. Eric Olson, Chair
NPFMC

RECEIVED

SEP 17 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I am a third generation Alaskan fisherman that is trying to make my way into the Alaskan fisheries. Like many other young fisherman, we need assurances that we will have the opportunities that fisherman before us had. The Halibut Catch Sharing Plan should not be changed. Right now, this month, I have purchased Halibut Quota in area 3A. If NPFMC changes the allocation, I will lose quota share without having even left the dock. It is a hard enough decision to make without the uncertainty brought by management policies.

The IPHC should delegate authority to set bag and size limits for charter sport harvest. I support the guided angler fish provision that allows charter owners to lease quota if their clients want more fish. If they want more quota they need to invest in the fisheries.

Take into consideration the CSP supplemental analysis that commercial fisherman have lost money over the past six years while charter operators have made money at low levels of abundance. Why does the charter fleet need more halibut at the expense of the commercial fisherman and their communities?

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

Thank you for the opportunity to comment.

Sincerely,

Evan Hall



360-220-2327

1110 Stellar Way, Kodiak, Alaska 99615

RECEIVED
SEP 17 2012

North Pacific Fishery Management Council
210th Plenary Session – Anchorage Hilton Hotel
October 1-9, 2012

**C-1(b) Halibut Fisheries Issues – Final Action on Halibut Catch Sharing Plan
For the Official Record: Opposing Increased Allocations to the Charter Fleet**

Madame Secretary, Chairman Olson, Council members:

I currently hold halibut quota in Area 3A, and will be directly affected by this CSP PPA action. **I oppose any additional reallocations to the Charter Fleet**, who for many years deliberately exceeded their Guideline Harvest Levels while our Commercial Halibut quotas were taking drastic cuts. **I support Status Quo (no changes or taking from commercial sector) for Area 3A.**

I support the Guided Angler Fish provision that allows Charter operators to lease IFQ halibut.

My (DOCHTERMANN, LUDGER permit 4359) total IFQ pounds in area 3A for 1998 was 83,490, which has now diminished to 40,887 pounds – a 51% cutback! At \$6.00/lb. that means my business plan income comes up comparatively short by \$255, 618 per year.

I have seen similar problems regarding my investments in areas 3B, 4A, 4B, and 4D. While not yet “underwater” on IFQ loans, the annual revenues have diminished by over \$600,000/year. Meanwhile, charter operators have made money at the lower levels of abundance. The Council is also well familiar with the harms of excessive Halibut PSC in the trawl fisheries in the GOA. My sablefish quotas are also harmed by other fishing sectors. My 40 years of time and expenses invested on fishing Rockfish and Cod in the GOA has not been credited to my vessel, while others take them as ‘secondary species’ or otherwise.

In conclusion, the CSP allocations set in 2008 should **NOT** be changed due to the political pressures, especially by a fleet that has gained increases while the Commercial sector sustained deeper losses.

Respectfully,



F/V STORMBIRD & NORTH POINT
P.O. Box 714; Kodiak, AK 99615

[Submitted 17 September 2012 by email.]

Subject: Sustainability of halibut resource
From: Ardis Jamison <ardisjam@casco.net>
Date: 9/18/2012 6:56 AM
To: npfmc.comments@noaa.gov

Dear Mr. Olson and Council Members:

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Thank you for your consideration and fairness in this matter.

Sincerely,

Ralph Jamison
Ardis Jamison
2655 NW Highland Drive, Unit 7
Corvallis, Oregon 97330

Subject: charter allocation increases

From: Bill Harrington <misslori@alaska.com>

Date: 9/18/2012 5:03 PM

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

Hello. My name is William Harrington and I fish halibut from the F/V Miss Lori and have done so for the last 27 years. My crew and I have taken serious hits on quota allocation over the last few years. Income has decreased substantially for all of us. The charter sector now wants to increase their allocation, again at our expense. I am still paying payments on IFQs I purchased which may or may not be paid for before I'm dead. I am in Homer at present delivering fish and there does not seem to be any lack of charter business going on.

If they want to increase their allocation I believe they should have to buy or lease their pounds just as we have to. I would be happy to lease them a thousand pounds just to show them that in fact there is a financial burden involved in this fishery and it is not just a "gimme more" scenario.

Best regards.

Bill Harrington

F/V Miss Lori & F/V Kilkenny

Kodiak, AK

Sent from my iPad

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 09-14-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 18 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The JPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: David R. Lyons

Address: 3313 HALIBUT POINT ROAD SITKA, AK

Dear Chairman Olson,

Please allow me to add a note to my husband's letter. He is 73 and still fishing because we have so many people dependant and assisted by the fishing income from the F/O Kraken. I work full time and we have taken into our household my childhood friend, a widow, who had no where to go and no means of support after her husband passed away.

Our nephew and his son fish with us. Our nephew is supporting 4 children still in school and two daughters in their twenties with kids who need financial help from time to time. His wife hated Alaska; moved back to Oregon, and left Jeff with the kids.

My husband has worked hard fishing all his life and has obeyed every law and regulation. Please do not punish our family.

T. O. O. P.

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 15 SEPT 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

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Thank you for the opportunity to comment.

Sincerely, W. Sonen

Name: WALTER SONEN

Address: BOX 107, SELDOVIA, AK 99663

I WAS GOING TO WRITE MY OWN LETTER,
BUT THIS PRETTY MUCH COVERS IT.
I AM AN ORIGINAL HALIBUT QUOTA SHARE - HOLDER
YOU GUYS GOT US INTO THIS! PLEASE DON'T
CHANGE HORSES IN THE MIDDLE OF THE OCEAN.

RECEIVED
SEP 18 2012

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/8/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 18 2012

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The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community. **WE HAVE CONTINUED TO MAKE INVESTMENTS IN CREW & GEAR WITH AN EVER SHINKING BOTTOM LINE.**

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name:

Lynn W. Potter (LYNN W. POTTER)

Address:

P.O. Box 1472, Cordova AK 99574
919 Chase Avenue

14 September 2012

VIA US MAIL & NPFC.COMMENTS@NQAA.GOV

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

RECEIVED
SEP 18 2012

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

My name is Charles E. Wood. I have been an Alaska resident since December 1954, and a commercial halibut longliner in Area 2C since 1982.

As a direct result of North Pacific Fishery Management Council (Council) action, longliners went from a free market, open access fishery to the mandatory and highly regulated Individual Fishing Quota (IFQ) Program, where my qualifying years had insufficient production to support my expanded fishing business. The Council, in essence, forced me to buy halibut quota at the Fair Market Value at the time, or fail in my business.

I borrowed \$120,000 at 7½% interest from the Federal IFQ Loan Program, and along with another \$95,000 from the sale of blocked halibut as a downpayment, bought unblocked halibut IFQs in an attempt to stay solvent. My entire fishing business portfolio including my boat, troll permit, originally issued IFQs, as well as the IFQs I was attempting to buy that included my 42% down payment, were tied up as collateral, that far exceeded the total value of my \$215,000 IFQ acquisition.

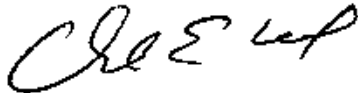
Ultimately, by last season (2011), I had lost my entire investment in halibut IFQs as well as some of my original quota share because of 2C quota cuts for conservation and to compensate for the years of unchecked overfishing of their Guideline Harvest Levels (GHL) by the charter sector.

In my view, the Council will fail to prevent ongoing substantial harmful socioeconomic affects to longliners if it enjoins the proposed 4-5% from the only sector that has truly participated in halibut conservation, and has actually purchased access to the halibut resource on the open market, access that came at great personal expense above and beyond merely buying a boat and a few sport rods. I fail to see where the Council has any reasonable rationale for implementation of what can only be described as a "taking" from one group of fishermen (longliners) for the benefit of another gear group (charter operators). If the Council chooses this option, then the United States Government should have the obligation to reimburse, in full, the longliners who bought into the IFQ Program in good faith.

My suggestion is to enact regulations which will allow the charter sector to either buy their way in if they need more halibut, in the same way that I, and hundreds of other longliners have had to do, or lease more poundage instead of merely "taking" from longliners, by adopting the Guided Angler Fish (GAF) provision. This would effectively end the "halibut wars" by creating a viable means for charter operators to expand their business without endless Council action and political activism, and would no longer unfairly penalize longliners through what to me is nothing less than Government garnishment, confiscation, and impoundment of my capital investments.

Thank you for this opportunity to express my views.

Respectfully,



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

cc: President Barack Obama
Rebecca Blank, Acting Secretary of Commerce
Jane Lubchenco, Under Secretary, National Oceanic and
Oceanographic Administration
Senator Lisa Murkowski
Senator Mark Begich
Representative Don Young
Governor Sean Parnell
Petersburg Vessel Owners Association
halibutcoalition@gmail.org

Date: 9-16-2012

From:
Gary Aulbach
PO Box 726
Petersburg, AK 99833

RECEIVED
SEP 18 2012

To:
Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

I am writing this letter in support of the percentage allocations adopted in 2008 for the Halibut Catch Sharing Plan for the Alaska Charter Fishermen. I was a deckhand on a commercial Halibut fishing boat when IFQ's were first implemented. I lost my deckhand job because of IFQ's. Yes, I was mad, frustrated and very rebellious at the time and was wondering how in the world could people take away so many fishing and deckhand jobs from so many good people? We had families and bills to pay and now we were out of the loop and had absolutely nothing!

I was without a fishing job for the entire next season, thinking that surely someone would see the mistake that had been made and change it back. That did not happen. I decided that if I wanted to fish, I better buy some IFQ's and get started. I started with 5,000 pounds of IFQ's and then expanded that to nearly 10,000 pounds, purchasing every one of those pounds. I now have 2,101 pounds and still owe \$31,000.00. After paying one crew member, bait, fuel, gear, grub and insurance, I cannot make the payments from what I earn by selling my Halibut. Yes, this makes me mad, frustrated and very rebellious especially when another commercial resource user wants a higher allocation and free access to the same Halibut I pay for. The 2008 CSP allocations provide a reasonable level of access for guided anglers at all levels of Halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

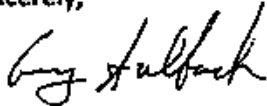
IFQ's have brought much higher quality fish to the market, a reliable source of fresh fish to buyers and sellers, higher prices to fishermen and better safety for the fleet. IFQ's have also provided an excellent tool for fisheries managers to be able to monitor the health of the stocks. When I purchased my quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. The charter fleet does not need more halibut at the expense of longline fishermen and the families and communities that depend on them. If charter clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot and will not support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

My long term plan for my IFQ's was to be able to fish them with my two sons, then give each son half of the quota to begin their own fishery or to sell it if that is what they wanted. It was to be the type of help that all parents want to give to their children, and the type which my parents were never able to give to me. That plan doesn't exist now, and will diminish even more as my quota continues to disappear. Please, do the right thing and recommit to the 2008 CSP percentage allocations.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Gary Aulbach".

Gary Aulbach

Brad Badger
P.O. Box 684
Haines, AK 99827

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

September 7, 2012

Dear Mr. Olson,

I have owned Halibut quota since 1993. When I first purchased this quota I was under the impression this was a wise investment. I did not envision the North Pacific Fishery Management Council to redistribute my investment to other groups.

I understand a conservation plan needs to be put in place and I believe the allocation percentages adopted by the Council in 2008 are fair to all user groups. I believe all user groups should participate in this conservation. I do not think the Charter operators are being held to the same level of responsibility as the commercial fishermen. Twice the Charter operators have been allowed an increase of 25% to their actual harvest, this is not responsible conservation.

The Charter fleet often exceeds their allocation; I believe there should be bag and size limits set for charter boats to maintain the charter harvest at their allocation.

I am in favor of the catch sharing plan percentage allocations adopted in 2008 and the detailed comments of the Halibut Coalition.

Commercial Fishing is my town's largest economic force if we lose much more quota we will all suffer.

Thank you for considering my comments,

Sincerely,



Brad Badger

September 15, 2012

Mr. Eric Olsen
NPFMC
605 West 4th Ave., Ste 306
Anchorage, AK 99501

Dear Mr. Olsen,

RE: Halibut Catch Sharing Plan (CSP)

My name is Matthew Short. I am 24 years old and have participated in halibut fisheries for over half of my life. In 2008 when I was still in college I purchased 8,249 pounds of 2C halibut quota for just over \$210,000. That total was down to 3,485 pounds for the 2012 season. At this total, after expenses and the boat share, I barely make my \$14,000 dollar a year loan payments. Buying this poundage was supposed to help pay my way through college and help get me into the halibut fishery but I'm not generating any income off of it at this point.

I support the CSP adopted in 2008. I feel the allocation percentages adopted in 2008 are fair from historic consumer access. As a young fisherman who has spent a considerable amount of money buying 2C halibut quota, I feel that politics should not have a role in this CSP and dispersing more of the poundage that I bought to the charter industry. The charter industry has twice been gifted an allocation 25% above their actual harvest and is again trying to increase their allocation by obstructing final regulatory action.

If you look at the CSP supplements analysis, the commercial fleet has lost money over the last six years and the charter fleet has made money at the low abundances. I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest like we do if they want more quota??

Once again, I support the CSP adopted in 2008. The commercial fleet has paid its dues and does not need the charter fleet cutting us back even more.

Thank you for the opportunity to comment.



Matthew Short
P.O. Box 1224
Petersburg, AK 99833

September 10, 2012

Mr. Eric Olsen
NPFMC
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olsen

RE: Halibut Catch Sharing Plan (CSP)

My name is Joe Short; I have participated in the halibut fisheries for the last 35 years. Halibut and black cod are my only fisheries. I have invested \$387,000.00 dollars in Halibut IFQ's. Between myself and crew this is the major income for three households.

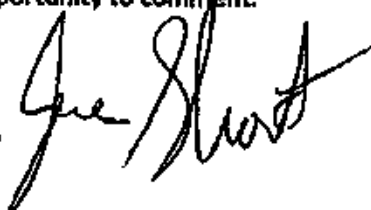
I support the (CSP) adopted in 2008. I feel the allocation percentages adopted in 2008 are fair from historic consumer assess. Politics should not play in this (CSP). The charter fleet, twice has been gifted 25% above their actual harvest, now they are trying to get more by obstructing final action, they will never in their minds have enough. They have played this game very successfully so far, let's finalize this action.

I invested all of this money in Halibut IFQ's expecting that the management system would not reallocate those investments to another group. If you look at the (CSP) supplements analysis we have lost money over the last 6 years while the charter fleet has made money at these low abundances. All the expense of the local commercial fleets and communities. We the commercial fleet provide fresh halibut to way more people than the charter fleet does, those with enough money to afford a trip to Alaska and hire a charter boat.

Something is wrong with this process, it is not working. Let's get this finalized and not at the expense of the commercial fleet and our communities.

Thank you for the opportunity to comment.

Joe Short
Box 1224
Petersburg, AK 99833



Subject: halibut reallocation

From: Marie Murray and John Murray <jmfish@ptialaska.net>

Date: 9/19/2012 9:23 AM

To: npfmc.comments@noaa.gov

Council members and staff

I wish to go on record opposing the reallocation of halibut in 2C and 3A. I am a Quota share holder of 2C halibut and a full time commercial fisherman since 1978. Sure we all want more fish available to catch. The question I pose to you is. Does the charter sector need more halibut to continue their livelihood? I know and associate with many charter skippers in Sitka, if they have weathered the poor economic times and are still in operation they are making a decent livelihood. The Council should stay the course. One possible means to get more fish to the select few that feel they always need more is to lease halibut from Quota holders.

Sincerely John Murray F/V Sea Bear 224 Observatory st. Sitka Alaska 99835.

James Mackovjak
P.O. Box 63
Gustavus, Alaska 99826
907-697-2246

September 19, 2012

RECEIVED
SEP 19 2012

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

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

Although I am no longer a commercial halibut fisherman, I have a lot of experience in the fishery. I fished halibut commercially during the 1970s and 1980s, and for eighteen years I owned and operated the fish processing business Point Adolphus Seafoods, where halibut was a mainstay. For a few years during the 1980s, I was one of two Gustavus-based charter fishermen. My operation was a low-key affair; I took my clients fishing in a Lund skiff. We stayed pretty close to Gustavus and did pretty well at catching halibut. (Basically, the reason I quit charter fishing is because I ended up having more respect for the fish than for the fishermen who took pleasure in killing them.) I continue to fish halibut—sometimes with a sport pole, sometimes with a subsistence longline—to feed my family and to share with neighbors who are unable to fish.

During the 2012 tourist season, there were about twenty charter vessels operating out of Gustavus. Only one operator was a resident of Gustavus. The rest show up in the spring from Utah and other places, demand services and ever-increasing allocations of halibut, help their clients kill huge amounts of fish (which, from a standpoint of meat quality, are mishandled every step of the way), and leave with their profits in September. These people have little concern for the well-being of the halibut resource or for our community. As you know, the Magnuson-Stevens Act standards require that federal regulatory decisions consider the effect of on local communities.

The following are my comments regarding the halibut Catch Sharing Plan (CSP) for the October 2012 NPFMC meeting:

1. The 2008 CSP allocations—based on historic and current harvest ratios between the charter and longline sectors—fairly and equitably share the halibut resource between these two sectors.
2. Perverse incentives in the charter regulations—namely, the reverse slot limit—are leading to increasing numbers of halibut being caught and

released. ("serial catch-and-release," my neighbor calls it) A considerable percentage of those released fish die.

I was on an Alaska Airlines flight from Sitka to Seattle last spring, and sat next to a fellow from Grants Pass, Oregon. He was returning home after fishing for several days with Kingfisher Charters. Halibut fishing was good. He said they had released "hundreds of pounds" of halibut, many of which were, in his words, "an inch too short or an inch too long." I asked him how they kept the fish on the boat, if they had ice with them. There was no ice; the fish were kept in "a box" full of water. According to the fisherman, on several occasions they "upgraded" (his term) by releasing a halibut from the box that was then replaced by a larger fish. He said he knew this was illegal, but "Oh, well."

Aside from being illegal, I can't imagine that many released halibut that had been landed and kept in a small hold full of water survived. How did they even get the fish in the hold to begin with? The usual way is with a gaff.

The engineer's maxim of not being able to control something you can't measure is applicable to halibut management. The NPFMC needs to have a reliable measurement of halibut release mortality for charter operators and this mortality needs to be factored into the charter operator allocation.

3. Charter operators are blatantly evading the charter fish catch limits by sending boats out "self-guided" or, I have heard, with unlicensed and theoretically unpaid young guys as helpers. Regulations must be tightened to prevent this sort of abuse.

Thank you for considering my comments. I appreciate the amount of work you and the council do.

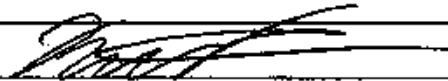
Sincerely,

James Mackovjak
P.O. Box 63
Gustavus, Alaska 99826

9-18-2012

I bought my quota last ~~year~~ and immediately lost almost 20% of my pounds. I paid money for it and went way into debt and now I ~~totally~~ can barely pay my bills with what I made from my IFQ's this year. Why should the charter boats be able to make money without investing ~~the~~ the money first? It is not fair and more importantly not morally right!!

Sincerely,
Kirik Kuznetsov



RECEIVED

SEP 18 2012

9-18-2012

I, Lazarus Kuznetsov, didn't get any of the original IFQ pounds. The quota that I DO have, I've been buying for the past seven years. The amount of money that owe for IFQ's won't be covered even if I sell my quota right now. Every year they cut my ~~quota~~ cut my pounds and it get harder, while the sport "charter" boats keep on making money ~~and~~ without spending a dime of their own. That isn't right, just, or fair. America is supposed to be the land of equal opportunity, isn't it? Well, what's so equal about this?

Sincerely,
Lazarus Kuznetsov
longliner since 1988

RECEIVED

SEP 19 2012

September 10, 2012

Mr. Eric Olson, Chair
North Pacific Fisheries Management Council
605 West 4th Ave. Suite 306
Anchorage, Alaska 99501

RECEIVED

SEP 19 2012

Dear Mr. Olson,
Re: Halibut Catch Sharing Plan (CSP)

My name is Jacquelyn Sidor. I have participated, with my family, in the halibut fishery for over 30 years. Working often in dangerous sea conditions, very hard, long hours to obtain IFQ. Yet the charter fleet was gifted an allocation of 25% above their actual harvest on two occasions and is trying again to increase their allocation by obstructing final regulatory action. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference.

I support the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the halibut commission.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them. Furthermore commercial fishers should be compensated for the quota reallocated previously. It was my expectation that the management system would not reallocate IFQ to another group. Commercial fishers WORKED in the fishery to obtain quota. It is not acceptable to take quota from commercial fishers and give that quota, earned by commercial fishers, to the charter fleet.

Your support for the Guided Angler Fish provision allows charter operators to lease quota if their clients want more fish. Why shouldn't charter operators invest if they want more quota? Commercial fishers earned their quota pounds in the first place and invest if they want more!


The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation. This will correct previous problems with the charter sector frequently exceeding their allocation. The charter fishery needs to be monitored closely and held accountable.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important that all sectors share in the conservation of halibut, equally, at all abundance levels.

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

Thank you for the opportunity to comment.

Sincerely,


Jacquelyn A Sidor

PO Box 806

Aberdeen, Washington 98520

I would just like to say that I support the catch sharing plan percentage allocations adopted in 2008.

I brought 13,000 plus pounds years back that has now already decreased dramatically. I won't get into the money bit figures.

I just want to say I have been a commercial habit fisherman with my own boat for 43 years and my 3 children are I now my crew and have been for years. They will someday take over the fishery from me, if there is a fishery left.

RECEIVED
SEP 19 2012

Thank you,

Jack C Lyons
Box 527
Petersburg, Alaska

99833

Date: 9-14-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 19 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish — but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access— through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the

expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name:

Jack C. Suprenant

Address:

Box 577 Petersburg, AK

99833

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/16/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 19 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name:

Clarence M. Jackson

Address:

*P.O. Box 200
Kake Alaska 99830*

*Couldn't make
payments 2 yrs
completely*

*Charter people
take all*

*out of state
we live here
don't believe they should
no answer.*

RECEIVED ^{Sept. 17th, 2012}

SEP 19 2012

Dear Mr. Olson,

My name is Dale Bosworth and my wife and I own the F/V Lesley Ann. We have made a long-term commitment to fish halibut, which we have done for over 35 years.

I purchased IFQ's with the understanding that this quota meant I could fish or sell as I wish. Your plan to take 5% of my quota and give it to someone else is morally not correct.

Taking this quota from me means that I will need to borrow in order to buy back quota lost. This debt will make my fishing operation very marginal and could put me out of the fishing business.

My comment is — if you wish to fish halibut for monetary value, buy quota.

Sincerely,

Dale Bosworth
Lesley Ann Bosworth

Sept. 18, 2012

RECEIVED

SEP 19 2012

Dear Mr Olson,

I do not think it is right to reallocate fish. We had to sell our house and motor home to purchase IFQ's thinking that it would be a set number. It is simply wrong to take away IFQ's I had to purchase to give to someone else.

Wayne J. Hase

FLN Pacific Sun

RECEIVED

SEP 19 2012

Sept 18, 2012

Dr Mr Olson,

- I believe it is wrong to reAllocate fish between user groups because it causes extreme anger between them and there is already too much. My quota has already been severely cut. Every few years more gets taken away from me and "gifted" to the charter fleet. And I believe it is simply wrong to do so.

Robert + Wagon

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 20 2012

Dear Mr. Olson:

These are my comments on the halibut Catch Sharing Plan for the Oct. 2012 NPFMC meeting. The details are my own, but the major concerns described here are common to those of us in Gustavus who have been tracking halibut stock changes, regulatory actions, and on-the-ground observation of halibut exploitation in our area. Topics #2 and #3 reflect a large number of observations and concerns voiced by local residents. It is fair to say that declining halibut stocks and over-exploitation are at present the foremost natural resource concern of Gustavus residents.

1. Do not increase the charter fishery's share over that provided in the 2008 Catch Sharing Plan. The Magnuson-Stevens Act standards require that federal regulatory decisions consider the effect on local communities.
Yesterday a charter captain told me that *"We've wiped out the 35 to 45 inch cohort of halibut in areas accessible from Gustavus"* - meaning Icy Strait and Cross Sound. What are the consequences of this?! If the NPFMC is unable or unwilling to find means of preventing inshore halibut depletions, at least it should not increase the allowable catch of the charter sector. Some points:
 - a. The charter fleet's allocation has already been increased twice.
 - b. That fishery is less controlled and monitored than the commercial fishery.
 - c. More of our coastal community residents are economically dependent on the commercial fishery than on the charter fishery. At this time, 20 out of 21 charter captains operating out of Gustavus are non-local, and with one exception, the charter lodge operators also reside out of state. This seems largely true around the region. An exception is Angoon, although an excellent authority told me that Whaler's Cove Lodge near Angoon is the largest local employer but is highly resented by the locals. Also note that very few charter clients are from this region of Alaska.
 - d. Halibut and salmon are by far the two main commercial and subsistence fisheries of Southeast Alaska, and it's the region that has experienced the greatest halibut decline. Groundfish and crab are comparatively minor fisheries here.
 - e. Charter fishing is far more likely than commercial fishing to take place in areas near communities, thus competing with residents' fishing for their families' food.
 - f. By allowing the growth of the charter fishery and spin-offs of that fishery (described in #3), the Council is allowing for inevitable local depletions near coastal communities. In the late 1990's, the Council believed that creation of Local Area Management Plans (LAMPs) would solve this obvious problem, but the Sitka LAMP was the only one formed or even

considered. Regulators and activists alike seem to believe that LAMPs can no longer be implemented.

- g. Managing on the basis of very large areas such as 2C and 3A was probably appropriate when commercial fishing was the only consequential exploiter, but not now, when intense inshore charter fishing threatens local depletions. The Council could do what the Pacific Fishery Management Council has apparently done in area 2A: divide these areas into smaller areas with their own halibut sport fish sub-quotas and close the season when these quotas are reached.

There are two reasons why the Council probably is not actually reducing the catch through the charter regulations it has promulgated. See #2 and #3 here.

2. Charter release mortality kills a large quantity of fish, currently not even accounted for in total charter catch and allowable catch calculations. Perverse incentives in the charter regulations are leading to increasing numbers of halibut being caught and released.
 - a. Even in 2010, before the 2011 area 2C regulations that limited charter-caught halibut to 37 inches and the 2012 regulations that had a 'reverse slot limit' of up to 45" and over 68", ADF&G's sport-caught halibut statistics showed that as many halibut were released as kept in area 3A, and nearly as many released as kept in 2C. And only "kept" halibut were counted as charter fishery catch. In our nearby areas (Icy Strait, Cross Sound & Glacier Bay), the number released was larger than the number kept. (statistics from "Participation, Effort, and Harvest in the Sport Fish Business/Guide Licensing and Logbook Programs, 2010, Appendix tables H4 and H5).
 - b. In the commercial longline fishery, an estimate of 16% mortality for released halibut is counted as part of that fishery's total catch.
 - c. Charter fishermen and clients fishing in our area complain that they had to catch and release a large number of halibut to return to the dock with a few not very large fish. ADF&G's creel census employee here said he talked to a number of captains who said they released 40 fish in a day. They also complained of the difficulty of measuring "over 68".
 - d. There has been no field study of halibut sport fish release mortality. Scott Meyer, ADF&G's sport fish bottomfish biologist, is apparently charged with developing a mortality estimate. He wrote this to me in answer to my questions:
"Generally speaking, release mortality will generally be estimated by multiplying an assumed mortality rate by the number of fish released and their average size (rate \times number released \times average weight). Higher mortality from poor handling can be incorporated by assuming a higher mortality rate. We are also obtaining information on the size ranges of released fish, so that may help refine the estimates. Release mortality of halibut in sport fisheries has never been studied, so the mortality rate is unknown and we will have to assume a rate. We also won't have an accurate estimate of the number of fish that were treated poorly

prior to release. Therefore, it will be difficult to know how much higher we should assume the mortality rate to be."

I had written to Meyer describing some questionable release practices that we know about, whose effects I doubted would be incorporated into agency analyses of release mortality.

A Power Point slide from the IPHC's 2007 annual meeting titled "Discard Mortality Rate in Recreational Fisheries" said:

- Discard mortality rate of halibut in recreational fisheries is unknown.
- Aggregate rate used for commercial fishing is 16%.
- 'Excellent' condition halibut have 3.5% and 'Moderate' injury fish have 36% discard mortalities, respectively, in commercial fishery. Higher occurrence of J-books and different release expertise would likely yield higher mortalities in the recreational fisheries.
- Accurate estimation will require tag-release-recapture study and take 2-4 yrs.

- e. I reported to Scott Meyer that one of our group heard from a man sitting beside him on a jet this summer. Returning home from a charter fishing trip out of Sitka, the man said the captain would keep halibut aboard in a water-filled tank and then put it overboard if a larger fish was caught. Meyer replied that this is illegal and should be reported. I've heard that a new thing this year is a number of charter boats returning to the Gustavus dock with water in their tanks, apparently for temporary holding of fish. We have also heard stories of relatively small halibut held overboard on stringers and allowed to fall off as the boat sped away heading for a new fishing spot.
- f. The increasing practices (described in #3) of evading the charter fish catch limits by sending boats out "self-guided" or with unlicensed and theoretically unpaid young guys (sometimes underage) as helpers is probably resulting in poorly released fish. If care of the "kept" fish is an indicator, we've heard remarks that they don't know how to kill the fish, and just bludgeon them, ruining the meat.

3. Means of evading the Area 2C charter-caught fish regulations (one fish with size limits) proliferate, allowing many clients to catch two fish of any size. Anecdotal information about seeing huge numbers of fish boxes shipped out of Icy Strait communities in 2011 and 2012 testify to the success of these models. Examples:

- a. Larger boats, often captained by people who have charter CHPs, towing or off-loading skiffs so that clients can fish nearby as "unguided." Someone here observed one such skiff that had neither a motor nor oars. Clients were taken to a good area for halibut, told how to fish, and assisted in every way, likely reboarding the mother boat after landing their halibut. And the fish would be dressed and packed by the operator or his staff.
- b. Charter lodges sending out young guys without CHPs or guide licenses, theoretically unpaid, on the boats to help clients with fishing and boat operation. The benefit to the young guys (some underage) is that they are building up vessel time for getting 6-pac boat operator permits. These

young men probably work in the fish processing or other parts of the lodge's operation.

- c. Clients taking out larger boats that are usually used in guided operations. The word is that one of the operators here had to replace eight anchors this summer due to inexperienced people using his boat.
- d. The long-standing Doc Warners Lodge in Excursion Inlet (60 clients per week) and a smaller one, Salmon Run Lodge send out three or four clients per skiff as "self-guided" fishermen. Doc Warner's skiffs are 16 or 18 ft. Lunds. They have laminated charts showing good halibut areas and a GPS showing halibut spots. A minder boat, one for every so many skiffs, travels around among them giving help with gear and boats and advice about where to fish.
- e. An existing fishing lodge in Elfin Cove, Northern Star Lodge, was recently bought, reportedly with financing from Doc Warner, and is operated by his daughter and son-in-law. Northern Star offers only self-guided fishing beginning in the 2010 or 2011 season. They have new 22 ft. boats with 150 hp engines. Instruction and information is provided for clients in the evenings. I'm guessing that Doc Warner refers some of the more experienced and aggressive of his clients to Northern Star. In a blog on the internet a prospective and a past client were communicating about this operation, one giving the other advice about where to fish and commenting that a recent sting against another lodge in Elfin Cove was causing Northern Star to be careful to stay inside the lines of the rules.
- f. Also in Elfin Cove, Eagle Charters, target of that successful law enforcement sting in, I think, 2010, now has at least one, and possibly more, "self-guided" boats. I saw one of their boats with "Self Guided" lettered along its side. (Incidentally, I passed through Elfin Cove in July 2011 and counted 25 fish boxes on the airplane float waiting for the Ward Air float planes. My husband passed through a week later and saw a much bigger pile of fish boxes on the airplane float, which was going partly under water and people were being asked to stay off until the boxes were loaded onto an aircraft. This was in a year when charter halibut regulations limited clients to one fish a day, 37" or less.)
- g. Taking people fishing but only charging for their lodging. This is being done by someone here who did not qualify for a CHP but was already operating a fishing lodge with guided fishing. Coming in to the dock this year, he told the creel census person 'These are just my friends'. Questions were asked about whether this was legal at the meeting conducted by NMFS enforcement personnel in Gustavus in the spring of 2011. They wavered a bit but implied that it may be legal. At that point another charter operator commented 'I'm told I can charge two times as much for lodging and zero for fishing and it's legal'.
- h. Dude fishing model (like dude ranching). Someone has a commercial fishing permit and takes people out on his boat as "crew." This reportedly happens here, but since his commercial permit is for hand trolling, he may just be doing this for salmon (no bycatch of halibut is allowed in salmon

fishing). Similar things reportedly occur in Elfin Cove but I don't know how it is done there.

I understand that the Council is looking into ways of limiting these kinds of operations, so the above list of known varieties may be useful to you. Meanwhile, commercial sport fishing is not being successfully regulated, at least not in our area.

4. Although this detail is apparently settled for the present, I wish to reiterate our objection to the method used in the planned leasing of commercial IFQ by charter operators. IFQ in *pounds* would be converted to *numbers* of Guided Angler Fish by dividing the leased pounds by the average weight of charter-caught fish in the most recent year without size limits. Because of the large fish in our Icy Strait-Cross Sound-Glacier Bay area, the result of this formula is that our area would be a magnet for catching leased fish. Several times as much poundage per GAF could be taken here than in some other subareas of area 2C. Recently an Elfin Cove charter operator posted ADF&G's table of the average weight of charter-caught halibut in the seven subareas of Southeast Alaska as evidence of why clients should come and fish here.

Thank you for your attention. I hope that the details provided above will be useful. I and many of my neighbors are apprehensive about the future of this critically important resource, and urge the Council's action to properly regulate the fishery while we still have a chance to avoid a collapse in local stocks.

Yours truly,

Judy Brakel Box 94, Gustavus, Alaska 99826 phone 907-697-2287
e-mail judybrakel@gmail.com

Date: 9-4-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

My business SUPPORTS the Halibut Catch Sharing Plan allocation percentages adopted by the Council in October 2008.

These percentages are fair and equitable. They protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers, even at low levels of halibut abundance. It is important for all sectors to share equally in conservation of the halibut resource at all abundance levels. The charter fleet was gifted an allocation 25% **above** their actual harvest (to the detriment of consumers, processors, and harvesters) on two occasions -1997 and 2000. Allocations were again increased with the 2008 CSP and yet again with last spring's logbook adjustment. Since last year, charter operator's efforts have been aimed at increasing their allocation further by obstructing final regulatory action. No sector should be rewarded with increased allocations through political interference or by obstructing regulatory action.

As a processor, we are dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both our company and community. We employ 64 people per year processing halibut (on the processing floor, the office, and in marketing/distribution). Loss of commercial quota costs jobs in the processing sector.

We ship over 40k pounds of halibut per year to brokers, stores, and restaurants. WE PROVIDE ACCESS TO HALIBUT FOR THE AMERICAN CONSUMER.

Thank you for the opportunity to comment.

Sincerely,

Name:

Chris Phillipin Vero Phillipis

Address:

1204 Zimovia Hwy Wrangell, Alaska

Subject:**From:** Kenneth Guindon <kjguindon@hotmail.com>**Date:** 9/20/2012 3:44 AM**To:** <npfmc.comments@noaa.gov>

Mr. Eric Olsen, Chair

North Pacific Fishery Management Council

Dear Mr. Olsen,

I came to the beautiful state of Alaska for the first time this year and I can say with all certainty, I will return. I am an avid fisherman and had the opportunity to go halibut and salmon fishing. While I was there, I went to the "city docks" nearly every day where the charter boats return with their catch. I was in Valdez, Homer and Seward and saw a lot of fish. I saw a group of 5 people that went halibut fishing 3 days in a row in Seward and caught several fish in the 60 to 80# range along with a lot of other bottom fish, it was a lot of meat. I guess the reason for my letter is to say that seems like too much meat taken by recreational. Why can't the recreational limit be 1 fish per person when it comes to halibut. That would cut down on the recreational harvest or at least help stay within their allotted quota. Those 5 men caught 30 halibut that I would guess averages 30lbs each. That's 900# of halibut to feed who? Recreational fishing is for recreation, not to provide fish for a single persons entire family tree. I caught 2 halibut while i was fishing on a charter and released one, a 30# halibut must have given me 17 pounds of filets or more. The thrill of catching a fish like a halibut is incredible. The amount of meat that recreational fisherman carry in your airport is astonishing and some kind of control has to be put in place. Commercial fisherman feed the world, cutting the Alaskan commercial fisherman's quota would mean less fish available to people that don't get the chance to catch their own, and from what I have read, it just isn't fair. A deal was already made and now you want to change it. Put some restrictions on the amount of charter boats Alaska has, limit the entry and cut the halibut limit to no more than 1 per person. I live on the Texas gulf coast where red snapper has been a hot issue for years. Here you can't start a charter business unless you buy an existing permit from someone, just like the commercial sector there are rules.

Subject: Halibut Quota

From: Rebecca Noble <rnoble@e-terra.com>

Date: 9/20/2012 9:55 AM

To: npfmc.comments@noaa.gov

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Rebecca M. Noble

Subject: CSP

From: Art Bloom <artmbloom@gmail.com>

Date: 9/20/2012 5:59 AM

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

Chairman Eric Olson

North Pacific Fishery Management Council

Additional Personal Comments from:

Arthur Bloom

4506 Prospect Way, Juneau, Ak 99801

I have approximately \$360,000 invested in IFQ for area 3A. When I purchased that quota I expected that the management system would not reallocate a portion of my investment to another group, especially without compensation. Doing so is simply unfair. There is no way to justify, in my mind, reallocation of this resource from a group that paid for their allocation to a group that has infringed on the system and has not paid for the allocation they now desire. Any other group utilizing the halibut resource being managed by the NPFMC was simply taking a risk that at some point they would be required to pay for access to that resource, just as I had to pay for my access. This should not be a political game, the management council has the responsibility to maintain a fair system. It is already grossly unfair that another group has been gifted some allocation without compensation. This is akin to adverse possession of property or claiming squatter rights. Allowing this is wrong, unfair, and contrary to the principles of our legal system and customarily recognized rights. The CSP allocations set in 2008 should NOT be changed. I do support a Guided Angler Fish provision that allows quota leasing, and any other provision that requires all users of the resource to pay for that use as a business investment. I had to invest my hard earned money to have access to the resource, and so should any other individual.

Arthur M. Bloom

Subject: Bycatch

From: Craig Matkin <comatkin@gmail.com>

Date: 9/20/2012 1:29 PM

To: npfmc.comments@noaa.gov

My name is Craig Matkin. I was a commercial fisherman for 20 years but I am now a marine mammal biologist extremely concerned about Chinook salmon bycatch in the Gulf of Alaska. One of my projects has focused on fish eating killer whales in Gulf of Alaska. We have found that Chinook salmon (along with Coho salmon) are primary foods in their diet. It is becoming clear that their survival is dependent on these fish.

There is just not enough good data to properly assess the scale and impacts of bycatch at this time. I ask that the Council prioritize observer coverage for fisheries with bycatch concerns, particularly the Gulf of Alaska trawl fisheries that catch Chinook salmon as bycatch. Please insure that these fisheries have increased coverage from the old bycatch program.

I also believe that electronic monitoring is a viable at-sea monitoring alternative to human observers. This option is important for small boats who have limited space onboard and I urge you to pursue this.

Sincerely,

Craig Matkin
North Gulf Oceanic Society
Homer, Alaska 99603

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
RE: C-1 Halibut Catch Sharing Plan

RECEIVED
SEP 20 2012

Dear Mr. Olson,

My name is George Malcolm Milne and I live in Homer, Alaska with my wife and two daughters. I have fished commercially since 1994 and now own and operate a 48 foot fiberglass fishing vessel. My first halibut trip was the last derby. I did not qualify to be issued any halibut quota when it was originally given out. As I gained more experience fishing and realized how the system worked I realized the best way to assure I would have a job and be able to continue fishing was to buy quota from the people who were given it. Over the years I've made several purchases and accumulated a moderate amount of shares.

In deciding to invest in Halibut Quota I understood the considerable risk involved. I have participated in IPHC setline surveys, looked at the historical fishery performance and became familiar with the biology. I assessed the risk of farmed halibut which in 2002, when I bought my first shares, seemed a very real threat. I also noticed the thriving charter industry and having worked at Coal Point Seafoods, a mainly sport caught processing plant, noticed the amount of fish coming over the docks. I have followed the process with the Catch Sharing Plan as well as the Charter IFQ program and the other attempts and was hopeful that some solution was imminent. I realized there was uncertainty but still felt it was a worthwhile investment for my business and family.

Having gone down this path I have become very frustrated with the Catch Sharing Plan process. Please look at the overall picture here and don't let the squeaky wheel get the grease. I waded through the 333 pages of analysis and agree with the conclusion that the overall cost or benefit to the communities is not affected one way or another. What I don't feel is equitable is to continue to increase the charter share of the Combined Catch Limit after you made a decision. Please look at Table 2 of the NPFMC's "Alternatives Considered in Public Review Draft of Revised Pacific Catch Sharing Plan in Area 2C and 3A". I hope that illustrates the potential gains the Charter Sector would enjoy at a direct cost to people like me. Their bottom line is not tied the amount of fish the catch. For me and my family it is.

I truly appreciate the time and effort you put into these issues.

Sincerely,

George Malcolm Milne

PO Box 1846, Homer, AK 99603

Date: 9-19-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 20 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP) - **SUPPORT for 2008 Allocation Plan**

My family has been providing nutritious, healthy, natural food for people across the nation and the globe for the past three generations. Sustainable commercial fishing for cold water, wild fish is one of the most environmentally and human health friendly food production systems in the world. Additionally, commercial fishing offers some of the few value added service opportunities still presented to the American people, and thus creates local, sustainable jobs for Alaskan and US citizens - from fish handlers, to processors, to value added product manufacturers, to local chefs, delivery and wait staff.

All of these benefits are greatly diminished, if not removed completely when wild stock resources are diverted from the benefit of society to the recreation of a few. I love sport fishing, and I think that it is great that the charter industry allows a few citizens to enjoy the excitement of personal harvest each year. At the end of the day, however, we must acknowledge that charter based access to wild stocks is a privilege reserved for a select few, both in terms of who receives the revenue, and in terms of who can afford access in this way.

In an ideal world, where stocks are unlimited, I would certainly support the ongoing ever-expansion of the charter industry's access to the resource. That is not the world in which we live, however; the stocks are limited, and dwindling. The charter industry has historically proven unable to limit its own consumption of these resources to its allotment.

When dealing with the allocation of a public resource, it becomes the resource manager's job to look for the allocation that provides the greatest overall public benefit and make the hard decisions. In this case, it is clear that the hard truth is that the charter industry must be brought under the same level of management as the commercial fleet has operated under for several years. It is also clear that the balance needs to be restored between the two industries, so that both commercial and sport operations may thrive, and grow in a sustainable fashion.

As such, I **SUPPORT** the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and

equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

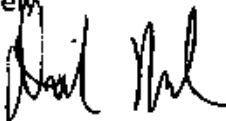
Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Diamond Redmond

CTO, E-Terra, LLC

Principle, Holistic Harvest

403 W 22nd Ave #311

Anchorage, AK 99503

Thank you for your hard work on these very complicated and difficult issues. We appreciate your desire + effort to manage our most precious resources! Please feel free to call anytime w/ questions or comments.

Diamond Redmond
907-306-6865

9-19-2012
RE: CSP

RECEIVED
SEP 20 2012

Dear Mr. Olson,

My name is Brian Blankenship, I'm a lifelong resident of Sitka AK. I've been a commercial halibut fisherman since age 14, I am now 55 years old, I've seen quite a bit. To sit back and watch an already 100% fully utilized resource get slowly reallocated away to another industry is just not right, especially when the commercial Halibut fishery was placed under the Government implemented IFEQ system and millions and millions of dollars have been invested in this program.

Now were supposed to take a back seat and watch an overcapitalized charter industry come in and take more halibut for nothing? They have already been gifted 25% above their actual harvest on 2 occasions and now is going for more. If that industry wants or needs more it should come from the Catch Sharing Plan. The council should not be swayed by lawsuits and threats of obstructing final regulatory action if they don't get there way once again. Thank you for taking the time and consideration to read this letter.

Regards.

B. Blankenship

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-4-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 20 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Robert Eckley

Address: PO Box 1274 Cordova, AK 99574

please stand by the CSP adopted in 2008. It is the most equitable. (percentage allocations)

RECEIVED

Sept. 16,

Mr. Olson,

SEP 20 1952

When does the bleeding end?
I thought it had when the quota was increased this year, thought maybe things had finally turned to the positive and now this, will the charter industry ever be satisfied, I think not. The bleeding will continue as long as its allowed.

I personally only have 2300 lbs this year to catch part of which was given me originally and part I purchased on my own. Why should it be any different for a charter operator. Let him buy more if he wants. I live in a charter boat neighborhood and was in contact with a lot of sports fishermen none of whom complained about their allotted limits. Lets leave things as they are and live with it.

Sincerely yours,

Sam Ellingsen

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: _____

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

SEP 20 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

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The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

I support ^{the} ~~the~~ plan to
Lease to the Charter Sector.

Name: James Wells

Address: 40969 Grandview LN. Astoria, OR 97103

I risked my life several times to earn my allocation,
Please don't give it to the charter industry to

ver... to - Tim Wells

RECEIVED

SEP 20 2012

9-19-12

North Pacific Fisheries Management Council,

In addition to this form letter, please note the following:

- I have made huge (to me) investments in my boat, gear + equipment, crew + training, market and contacts, and above all, quota shares.
- Halibut fishing is the most significant contributor to my family income.
- My quota has been cut annually for many years in a row, so that I may only catch a small fraction of what I used to catch.
- My efforts contribute greatly to the economy of our region.

It is your job as managers to protect our interest from being destroyed, eroded, or given away to someone else. Do not let any portion of my halibut quota be reallocated to another user.

Sincerely,

Rion J. Vanek

Rion T. Vanek

P.O. Box 39251

Ninilchik, Ak 99639

Mr. Eric Olson,

RECEIVED

SEP 20 2011

Wasn't the charter fleet already giving 25% above their actual harvest while I watched my quota, that I paid for, and am still paying for, get smaller and smaller. Now they want up to 5% more of my quota (for free) that I'm still paying for. This is crazy. Stick with the plan. The CSP allocations should not be changed. The 2008 plan should be put in place ASAP. We have lost enough! I invested in a proven stable industry which has been uprooted by greed and over-exploitation when IFA's came into existence, I got nothing. I had to buy in and that's what we all did. The charter industry is getting handed there share plus some for free. No investment! We were a growing industry also. We needed to be controlled. IFA's did that. Even though guys like me who have been in the industry for 25 years lost out, we took it and bought in. It's time for the chartered fleet to do the same. Leave what we have left alone.

Steve Box

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: Sept 11 '12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 20 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

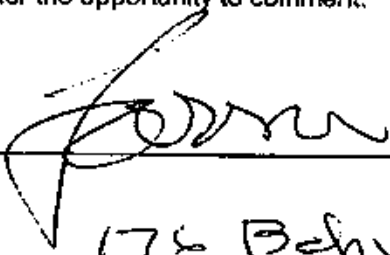
My family is dependant on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name:



Eric Forver

Address:

176 Behvends Ave JUNO AK 99801

Have held one block since the beginning, currently hold 2

Sept 17 2012

Mr Eric Olson Chair

NPFMC

RECEIVED

SEP 20 2012

Dear Mr Olson

I am against any reallocation of the halibut quota to the charter fleet. I'm in favor of halibut quota reductions for conservation, but NOT reallocation.

It seems as if the council has been working on the charter fleet allocations for the last 15 years or more & each time they want more.

Will it ever end. Their fisher needs to change from a meat fisher to a sport fisher, & NOT about how many lbs of fish you can take home.

I have bought 30,000 lbs of 2C quota & as you know I'm NOT catching much of that. I'm a full time fisherman.

Please Don't Give more of my livelihood Away.

John Smith
Box 6017 Metlakatla WA



OUZINKIE NATIVE CORPORATION

P.O. Box 89

Ouzinkie, Alaska 99644

Ph: (907) 680-2208, Fax: (907) 680-2268, Email: salmonlaker@yahoo.com

September 20, 2012

North Pacific Fisheries Management Council
605 W. 4th Ave.
Anchorage, AK 99615

Re: Support for Kodiak Island Borough and City of Kodiak
Joint Resolutions FY2013-9&10 Regarding
Comprehensive Management of Prohibited Species Catch
by the Trawl Fishery in the Central Gulf of Alaska

Dear Chairman Eric Olsen and Council members:

Ouzinkie Native Corporation on behalf of its shareholders and the residents of Ouzinkie is committed to maintaining and expanding fishing opportunities in Ouzinkie as well as the conservation and stewardship of marine resources and resource habitat. We continue to believe that all bycatch, including trawl bycatch, should be reduced by the North Pacific Fisheries Management Council. We have reviewed the Council's motion regarding your October discussion "developing a program to provide tools for effective management of PSC, incentives for minimization of bycatch and vessel level accountability for the Central Gulf of Alaska trawl groundfish fisheries". How this program may be developed is very important to Ouzinkie.

Kodiak Island Borough and the City of Kodiak have developed suggested goals for the Council to consider as you discuss GOA trawl groundfish bycatch reduction. Ouzinkie Native Corporation has reviewed these goals and we concur with KIB and Kodiak City that these goals should be adopted by the Council and incorporated into any problem statement and elements and options for analysis that the Council may consider. We believe these goals represent the starting point for the Council's discussion.

Ouzinkie Native Corporation is adamant that trawl groundfish processing opportunities be retained for our community. The Council should not even consider any type of closed class of processors and/or landing requirements specific to the City of Kodiak. In addition, ONC would encourage the Council to limit consolidation that may occur in the trawl fishery. Maintaining the current fleet will continue to provide needed crew jobs and fishing opportunities.

Thank you for your consideration of Ouzinkie's support for the 10 programmatic goals outlined in the KIB and Kodiak City resolution as well as our concern to preserve community processing opportunities.

Very truly yours,


Jackie Muller, Chairman

Bill Burk
2041 Olympic Drive
Anchorage, Alaska 99515
907.522.3471

September 4, 2012

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

Re: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

I **SUPPORT** the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

Reallocating 4-5% of my Halibut quota to the charter operators is not fair to the commercial fishermen that have paid to purchase quota's, as myself, for living income.

In 2006, I went in debt, in order to purchase more quota's. In order to get a loan to purchase 21,000 pounds of halibut quota's I had to use my home, my fishing boat and quota's as collateral to get bank financing. 2008 I went in more debt in order to purchase more quota's. I am currently in debt paying loans for halibut quota's.

Charter boat owners/operators can purchase quota's as I did, use everything they own as collateral. No FREE B'S.

Commercial fisherman have lost quota's the past years. 2010 I was cut down 9 ¼ %. 2011 I was cut down 25 ¼ %. 2012 I was cut down 26%. These lost quota's are acceptable in order to prevent the over fishing in certain areas. I can accept that. Although if I am still paying off loans for Halibut quota's that I purchased, reallocating to the charters boat/owner operator is not fair to the commercial fisherman currently in debt and rely on this income for their living income.

Please include myself, Bill Burk, on October 4th, to testify. Thank you for the opportunity to comment regarding this issue.

Bill Burk
2041 Olympic Dr.
Anchorage, AK 99515



9/13/2012

Mr. Eric Olson, Chair
North Pacific Management Council
605 West 4th Ave, Ste 306
Anchorage, Ak 99501

Dear Mr. Olson,

Re: Halibut CSP

I support Halibut catch sharing allocation percentages negotiated and adopted by the council in 2008.

I began running my own commercial halibut operation in 1985. In the early 1990's we were obliged to accept the IFQ program.

As a fleet we accepted the necessity for conservation measures and were led to believe that other user groups would also embrace conservation needs.

We accepted the necessities of buying IFQ shares and were led to believe that other commercial halibut users would operate under similar parameters.

There is absolutely no excuse for Charter Halibut Operators (who are commercial operations!!) not accepting conservation measures and the Catch Sharing Plan allocations adopted in 2008. These percentages represented 25% concessions above charter harvests on two different occasions, by longliners.

Charter interests are simply trying to increase their allocation percentage by obstruction final regulatory actions and exploiting political interests.

Thank you,



William Flor, F/V Bazarof
PO Box 262
Petersburg, Alaska 99833

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-9-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: Mike McKenzie

Address: P.O. Box 66, Metairie, WA 99152

I have been fishing Halibut since 1997. I was not grandfathered in because I missed the deadline by 1 year. So because I have been paying for my IFQ's for all these years I honestly can not afford to lose even 1 more pound!

September 20, 2012

Mr. Eric Olsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501

Re: Support CSP allocations adopted in 2008 and Halibut Coalition position

Dear Mr. Olsen,

I oppose any reallocation of halibut to the charter fleet.

- The charter fleet pays nothing for management (no IFQ tax).
- The charter fleet is totally unobserved and their logbooks are self reported.
- The charter fleet data is the least exact (important especially at low stock levels).

Giving the charter fleet a higher percentage of the quota will weaken management data and reduce money available for management.

Many IFQ fishermen have bought their IFQ and are struggling to make payments especially in 2C. They can not afford to lose more poundage. The average pounds for areas 2C IFQ holder is 2,357 pounds compared to the 2C charter permit holder average of 3,397. This means that on average they hold 40% more fish per permit holder individually - lodges may have dozens of boats which easily put their lodge catch well above the commercial vessel cap. In 2C the cap for commercial vessels was about 26,000 pounds this year - there are lodges in 2C that land two or three times that amount. Seems to me you are picking on the little guy (and the local guy) if you continue to reallocate resources from the commercial fishery to the charter fishery.

Limited entry and management measures of the charter fishery have finally kept the charter fleet within its quota. The charter fleet doesn't need more fish to survive. If a charter business wants more fish they can lease through GAF.

I support the CSP allocation set in 2008. I don't support any additional allocation to the charter fleet. The Council analysis that assumes more quota will be reallocated is disappointing and disturbing.

Sincerely,
Richard Curran
Box 1336 Sitka, AK 99835
F/V Cherokee
Board member SPC and ALFA

2616 Douglas Hwy
Juneau, Alaska 99801
September 19, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson and Members of the Council,

Re: Catch Sharing Plan (C-1)

I SUPPORT the catch sharing plan allocations adopted in the 2008 catch sharing plan and detailed comments submitted by the Halibut Coalition.

I am a 3rd generation fisherman and have been a fisherman since 1967. I began fishing halibut in 1969 after Army service in Vietnam. My son-4th generation-- is carrying on the family longline tradition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The NPFMC has increased the charter percentage twice under GHJ plans and again under the CSP— this rewards overfishing and does not set a good example of people's responsibility to prevent overfishing as required by the Magnuson-Stevens Act.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation. This is the most effective and timely way to make these decisions within Council guidelines. The GHJ has not been effective in preventing 2C charter 3.7 million pounds of overages since 2004. It took seven years to get to the 37" rule which for the first time hold the 2C charter fleet to their allocation.

The opportunity for individual charter operators to annually lease "Guided Angler Fish" (GAF) from individual QS holders at a market based price is an important tool for guides. It allows an opportunity for larger size fish if their clients so desire. It is telling that the Canadians in 2B came to the same conclusion and have an experimental GAF program in effect last year. I urge you to include the preliminary reports from that program in the final EA. That will provide some real data on willingness to pay for a halibut by recreational fishermen. In addition, they have developed an online auction system for the transfers and NMFS may not need to reinvent the wheel on setting up the US program for 2013/14.

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community. I am close to retirement and continued income for the halibut fishery is important my family's financial security.

The NPFMC should evaluate the efficacy of the CSP program after three years and have a deliberative discussion of the results.

It is likely the continuing national recession and high unemployment will depress demand for charter trips for several more years. I would hope that the charter industry and their support businesses would use their marketing expertise to generate business by emphasizing factors other than how many halibut they catch. Alaska has much to offer their clients.

NMFS needs to call an end to the charter industry's 19 year history delaying tactics and implement the CSP. Preventing overfishing is a national priority and each sector should be held accountable at all levels of abundance and share the gain and pain when stocks fluctuate.

Thank you for the opportunity to comment.

Sincerely,



James D. Becker
F/V KRISTINE

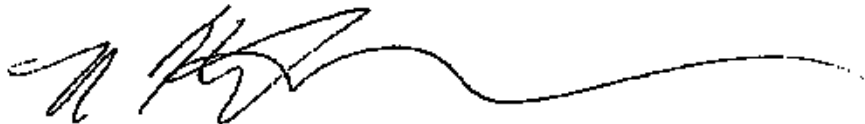
Dear Mr Olson,

September 4, 2012

Concerning the reallocation of quota to the charters, If the charters desire and require a larger quota they should buy it the same way I got mine. Mine has evaporated from about 10,000 pounds to around 2500 pounds.

To take from me what I have purchased and give it to another without any compensation to me is wrong.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Norman K. Sowards', with a long, sweeping horizontal line extending to the right.

Norman K. Sowards

September 19, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Alaska Halibut Catch Sharing Plan

My restaurant serves approximately 200 to 300 pounds of halibut meals, mostly in "halibut and chips", to American consumers every year. My access to halibut is through the Alaska halibut fishermen. Without the efforts of halibut fishermen and processors, we would not be able to purchase halibut in markets or provide healthy, sustainable meals to our customers.

I urge you to support the commercial/charter allocation adopted by the North Pacific Fishery Management Council in October 2008.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed. The charter fleet was gifted an allocation 25% above their actual harvest on previous two occasions and is again trying to increase their allocation.

Thank you for considering my comments.

Sincerely,



Gail Niemi
Sandbar and Grill
9465 Mendenhall Loop Road
Juneau, AK 99801

Date: September 20, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501.

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

My business supports the catch sharing plan allocation percentages adopted by the Council in October 2008. We understand that other alternatives have been presented as a result of charter operators' concerns about allocations at low levels of halibut abundance.

Alternative three preserves important elements of the October 2008 Catch Share Plan. But it includes three mechanisms for reallocating halibut to the charter sector that we cannot support.

First, we endorse separate accountability, but when discard mortality in the charter fishery has not been calculated, "separate accountability" becomes an uncompensated reallocation to the charters.

Second, a correction factor for switching to the state logbook for monitoring charter harvest gives charter companies more fish.

Finally, a reallocation factor to match the CSP allocations more closely to the GHL at low levels of halibut abundance allocates more halibut to the charter sector.

In all three cases, these increased allocations to the charters are at the expense of the commercial sector, despite an economic analysis documenting that charter operators have increased revenues over the past six years while commercial fishermen have lost revenue and watched their investments in quota shrink to less than the balance on their loans.

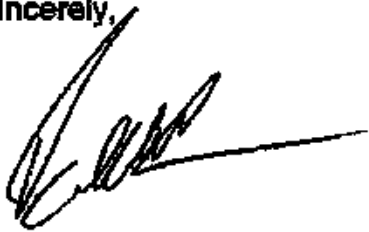
Catch limits are down for the commercial fleet and uncertainty prevails over the health of the biomass. This is not the time for any sector to be given an increased allocation, and definitely not at the expense of the sector that provides food to consumers.

As a processor, we understand the vagaries of a wild fishery and the importance of prudent management measures. Uncompensated reallocation to the charter sector is not only imprudent, it will negatively impact both our company and our community. We employ 25 people per year processing halibut (on the processing floor, the office, and in marketing/distribution). Loss of commercial quota costs jobs in the processing sector.

We ship over 200,000 pounds of halibut per year to brokers, stores, and restaurants in the U.S. and overseas. Loss of commercial quota also costs market share in the highly competitive battle for center of the plate.

We support a modified version of Alternative 3 that does not reallocate halibut from the commercial sector to the charter sector without compensation. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad McLean', with a long horizontal line extending to the right.

Name: Brad McLean, French Creek Seafood Ltd.

Address: 1097 Lee Road

Parksville, BC, V9P 2E1

9/14/12
Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 W. 4th Ave, Ste. 306
Anchorage, AK 99501

Mr. Olson,

I am writing to you to express my support for the catch sharing plan percentage allocations adopted in 2008 for the Alaskan commercial halibut fishery.

As a young commercial fisherman, the security of my family are dependent upon commercial fishing. That income is dependent on my ability to meet my loan payments so that I have quota to fish. In an era of dramatically reduced 2C and 3A quotas for reasons of fishery health, the prospect of reallocation of the harvest ratio to the detriment of commercial longliners raises serious financial concerns for me.

In the years I have been involved in commercial longlining my 2C quota alone has been reduced by 80% while the price per pound for IFQ has skyrocketed. The high price of IFQ now makes it financially unfeasible to enter into a traditional bank loan to buy quota. I do not have access to the several hundred thousand or even millions of dollars of capital required to purchase enough quota to start a self-sustaining longline operation and do not have any gifted quota from previous catch history during open access. My only viable option is the beneficial terms of a NMFS loan. These loan terms are designed to aid fisherman like me in acquiring the aforementioned startup capital to purchase IFQ. If the harvest ratio is reallocated between the commercial and charter sectors and the price of IFQ continues to rise I have serious concerns as to whether the profit margin of my IFQ will be large enough to allow me to make my loan payments and save enough money to purchase more IFQ in the future, despite the advantageous terms of a NMFS loan.

Now that the days of open access halibut longlining are gone, the only way to enter the commercial halibut fishery for a longliner is to purchase existing quota. For the younger generation of commercial fisherman, of which I am one, the only way to acquire the capital needed to purchase IFQ is by taking on a staggering amount of debt. The overall startup cost of a charter business is orders of magnitude lower than that of a commercial operation and they do not have to purchase quota. Therefore, it is fair that they lease additional quota for their clients thru the Guided Angler Provision (GAF). It is not fair to reallocate an already diminishing resource in their favor without compensation to the commercial longline sector. I have put the financial


security of my family and myself at risk to enter the commercial halibut fishery and I think it is equitable to ask commercial charter operators to do the same.

Young fishermen are slowly being priced out of the commercial fishing industry by the rising costs of everything from IFQ to fuel to a bale of seine web. This trend risks the long term viability of the tradition and heritage of our industry, the financial welfare of the commercial fleet, and consumer access to an increasingly valuable source of protein. It is paramount that the management council considers the priorities of resource allocation and the effect it has on consumer access to fishery resources. The charter fleet provides a "luxury" opportunity for a tiny percentage of American consumers to access the resource by taking them to the fish. The commercial longline fleet on the other hand allows a drastically larger percentage of American consumers access to the resource by bringing the fish to them. It therefore becomes the council's mandate to decide whether this resource exists to satisfy the desire for a boutique fishing experience for the rich or to satisfy the right of normal American families to access a sustainable and healthy source of protein.

If charter operators want more fish for their clients provisions exist for them to lease quota from commercial operators. These provisions begin to close the investment gap between the two sectors of the allocation plan in an equitable manner. If I want more fish to catch and thereby increase the financial viability of my business I am required to invest more money thru the purchase or leasing of additional IFQ. I do not consider it unreasonable to expect that the charter fleet operate under the same parameters and assume the same financial risks inherent to the acquisition of capital. I do consider it unreasonable, inequitable, and unfair for the NPFMC to reallocate my investment to another commercial group without compensation. Such a reallocation is particularly unfair when it undermines my financial stability and that of my family without requiring a similar assumption of financial risk from the charter fleet.

Thank you for time and the opportunity to comment.

Sincerely,



Travis Kapp
P.O. Box 713
Petersburg, AK 99833



**Boggs
Enterprises**
3900 Railway Ave
Everett, WA 98201

September 19, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,
Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



John R. Boggs
Boggs Enterprises
3900 Railway Ave
Everett, WA 98201

**HART SALES Corp**

Wednesday, September 19, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

My business supports the catch sharing plan allocation percentages adopted by the Council in October 2008. We understand that other alternatives have been presented as a result of charter operators' concerns about allocations at low levels of halibut abundance.

Alternative three preserves important elements of the October 2008 Catch Share Plan. But it includes three mechanisms for reallocating halibut to the charter sector that we cannot support.

First, we endorse separate accountability, but when discard mortality in the charter fishery has not been calculated, "separate accountability" becomes an uncompensated reallocation to the charters.

Second, a correction factor for switching to the state logbook for monitoring charter harvest gives charter companies more fish.

Finally, a reallocation factor to match the CSP allocations more closely to the GHIL at low levels of halibut abundance allocates more halibut to the charter sector.

In all three cases, these increased allocations to the charters are at the expense of the commercial sector, despite an economic analysis documenting that charter operators have increased revenues over the past six years while commercial fishermen have lost revenue and watched their investments in quota shrink to less than the balance on their loans.

Catch limits are down for the commercial fleet and uncertainty prevails over the health of the biomass. This is not the time for any sector to be given an increased allocation, and definitely not at the expense of the sector that provides food to consumers.

HART SALES Incorporated.
850 Blanshard Street Victoria, British Columbia V9A 5G9
Phone: 250-388-7639 Fax:250-388-7649
www.hartsc.com

**HART SALES Corp**

As a processor, we understand the vagaries of a wild fishery and the importance of prudent management measures. Uncompensated reallocation to the charter sector is not only imprudent, it will negatively impact both our company and our community. We employ 63 people per year processing halibut (on the processing floor, the office, and in marketing/distribution). Loss of commercial quota costs jobs in the processing sector.

We ship over 300,000 pounds of halibut per year to brokers, stores, and restaurants in the U.S. and overseas. Loss of commercial quota also costs market share in the highly competitive battle for center of the plate.

We support a modified version of Alternative 3 that does not reallocate halibut from the commercial sector to the charter sector without compensation. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. B. Hartman', is written over a long, horizontal, slightly wavy line that serves as a signature underline.

LAW OFFICE OF SONJA REDMOND

35865 Sunset Park St.
Soldotna, Alaska 99669
907-262-7848
Fax 907-262-7872

Licensed to Practice in Idaho, Indiana, and Alaska

Date: 9-20-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP) - **SUPPORT for 2008 Allocation Plan**

My family has been providing nutritious, healthy, natural food for people across the nation and the globe for the past three generations. Sustainable commercial fishing for cold water, wild fish is one of the most environmentally and human health friendly food production systems in the world. Additionally, commercial fishing offers some of the few value added service opportunities still presented to the American people, and thus creates local, sustainable jobs for Alaskan and US citizens - from fish handlers, to processors, to value added product manufacturers, to local chefs, delivery and wait staff.

All of these benefits are greatly diminished, if not removed completely when wild stock resources are diverted from the benefit of society to the recreation of a few. I love sport fishing, and I think that it is great that the charter industry allows a few citizens to enjoy the excitement of personal harvest each year. At the end of the day, however, we must acknowledge that charter based access to wild stocks is a privilege reserved for a select few, both in terms of who receives the revenue, and in terms of who can afford access in this way.

In an ideal world, where stocks are unlimited, I would certainly support the ongoing ever-expansion of the charter industry's access to the resource. That is not the world in which we live, however; the stocks are limited, and dwindling. The charter industry has historically proven unable to limit its own consumption of these resources to its allotment.

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I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Sonja Redmond

Date: 9-19-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP) - SUPPORT for 2008 Allocation Plan

My family has been providing nutritious, healthy, natural food for people across the nation and the globe for the past three generations. Sustainable commercial fishing for cold water, wild fish is one of the most environmentally and human health friendly food production systems in the world. Additionally, commercial fishing offers some of the few value added service opportunities still presented to the American people, and thus creates local, sustainable jobs for Alaskan and US citizens - from fish handlers, to processors, to value added product manufacturers, to local chefs, delivery and wait staff.

All of these benefits are greatly diminished, if not removed completely when wild stock resources are diverted from the benefit of society to the recreation of a few. I love sport fishing, and I think that it is great that the charter industry allows a few citizens to enjoy the excitement of personal harvest each year. At the end of the day, however, we must acknowledge that charter based access to wild stocks is a privilege reserved for a select few, both in terms of who receives the revenue, and in terms of who can afford access in this way.

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As such, I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

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When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Diamond Redmond

CTO, E-Terra, LLC

Principle, Holistic Harvest

403 W 22nd Ave #311

Anchorage, AK 99503

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

I am dependent on income from the halibut longline fishery as a deckhand, and reallocation to the charter sector hurts my ability to be employed on a commercial halibut fishing vessel. The

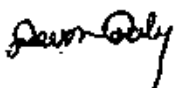
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communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision.

I am the future generation of longliners. Please consider those of us that would like to continue in the commercial tradition of halibut fishing when making this very serious decision about

halibut reallocation. Our deckhand jobs and our future depend on your support to recommit to the adopted catch sharing plan percentage allocations of 2008 and the CSP charter management system streamlining.

I thank you for your time,



Devon Daly

September 18, 2012

Mr. Eric Olson, Chair

North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

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Mike & Lorraine Daly
Sitka, Alaska

Thank you for your time,



Date: 9-20-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP) - **SUPPORT for 2008 Allocation Plan**

My family has been providing nutritious, healthy, natural food for people across the nation and the globe for the past three generations. Sustainable commercial fishing for cold water, wild fish is one of the most environmentally and human health friendly food production systems in the world. Additionally, commercial fishing offers some of the few value added service opportunities still presented to the American people, and thus creates local, sustainable jobs for Alaskan and US citizens - from fish handlers, to processors, to value added product manufacturers, to local chefs, delivery and wait staff.

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Thank you for the opportunity to comment.

Sincerely,



Tom Redmond
35865 Sunset Park St.
Soldotna, Alaska 99669
907-262-7844

Gary Adkison
PO Box 585
Craig, AK 99921

September 19, 2012

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

RE: Halibut Catch Sharing Plan Agenda Item C-1(b)

Dear Eric Olson, chair and Council Members,

I am a 70 year old commercial fisherman that purchased 6,000 lbs of halibut IFQ that are now down to 1400 lbs to supplement my social security retirement. I can't afford to attend this meeting as the SE pot shrimp fishery opens on the first of October and I can't afford to lose the income from this short-season also. How can you consider giving an additional higher allocation to the charter fleet without consideration of the commercial fishermen who purchased into the system that you built? You should be supporting a system that requires the charter sector to purchase quota from the commercial fleet if they need additional allocation. I support maintaining the allocation to the charter sector at the level that was recommended by the Council in the October of 2008 as part of the halibut catch share plan and rely on Southeast Alaska Fishermen's Alliance and the Halibut Coalition that represent me to speak to the individual details in my absence.

I also believe that the Council should be re-looking at the federal subsistence program for halibut and making some changes to that program particularly the need for subsistence gear to be attended (i.e. within sight of) when in the water and either annual limits or smaller daily limits should be considered. Either the regulations need to be changed so that only SE rural residents can participate in the halibut subsistence fishery or enforcement needs to be looking into residency of halibut subsistence fishermen.

Thank you,

Gary Adkison

Gary Adkison

**Fax to (907) 271-2817 or mail to arrive by COB
Sep 25, 2012**

Date: 9/20/2012

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Ave, Ste 306

Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

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Thank you for the opportunity to comment.

Sincerely,

Name: DUSTIN CONNOR

Address: 5434 51st ave NW, Olympia, WA 98502

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/20/2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

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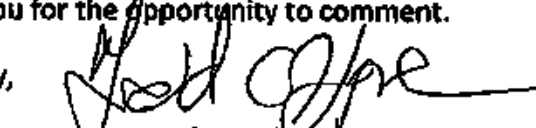
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Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

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Thank you for the opportunity to comment.

Sincerely,



Name:

Todd Hoppe

Address:

P.O. Box 2589 Homer, AK 99603

Alkimail Staff

From: William Curtin <billycrtn@yahoo.com>
Sent: Tuesday, September 18, 2012 11:50 AM
To: Alkimail Staff
Subject: Fwd: HALIBUT csp

9/18/12

Begin forwarded message:

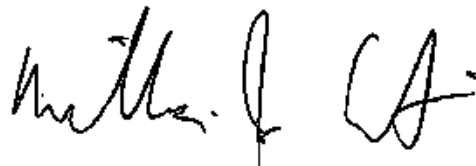
RECEIVED
SEP 21 2012

From: William Curtin <williamcrtn@yahoo.com>
Date: September 18, 2012 10:54:24 AM PDT
To: Billy Curtin <billycrtn@yahoo.com>
Subject: HALIBUT csp

To whom it may concern:

I have been a longliner/commercial fishermen for 24 years and a Second Generation Quota share holder. Thanks to NMFS/NOAA I was able to take out a loan for 500,000\$ in order to purchase halibut/ black cod quota shares. Any allocation or "sharing" of quota is essentially taking a part of my investment! Give the charter fleet every opportunity to let them buy or lease quota for their livelihood just as I have! Halibut fishing is an investment it is not a right buy into the fishery and be a steward and pay fish / observer taxes. If the charter fleet wants more Halibut let them lease just like I do!

regards William Curtin
invested longliner



LAW OFFICE OF SONJA REDMOND

35865 Sunset Park St.
Soldotna, Alaska 99689
907-262-7846
Fax 907-262-7872

Licensed to Practice in Idaho, Indiana, and Alaska

Date: 9-20-2012

RECEIVED
SEP 21 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP) - **SUPPORT for 2008 Allocation Plan**

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Thank you for the opportunity to comment.

Sincerely,


Sonja Redmond

*Thank you for your
time in considering
our interests.
Sonja*

Subject: Halibut Catch Sharing Plan

From: Karen Johnson <kljinsitka@yahoo.com>

Date: 9/21/2012 6:12 AM

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

It's September and once again I am writing yet another letter expressing my concern over the handling of the halibut charter situation. After all this time, and after all the efforts of the commercial longline community and others it still comes down to a group that does not want to take it's responsibility for the resource. I am completely dumbfounded. How does a group have continuous success with the idea that allowable catch, GHL, allocation, etc. should be based on their needs, not what the resource can sustain. Why can one group complain year after year in this manner and keep getting results. Is the science that determines catch levels really tied their needs? How many years did we hear that the solution for their (Halibut Charter industry) inability to stay within their GHL was to simply raise it. Now we are heading backwards once again with a suggestion of reallocation. Reality check: This is a natural resource, you cannot expect your allowable catch to remain constant and exclude you from any loss when the resource requires it.

Hardship?, since it works for them let me give it a try. I am a single mother, I have fished for halibut since 1978, I bought my own pounds years ago and have watched them dwindle. My block of 2C halibut that was 2,100 lbs when I bought it is now under 500 lbs. I love to fish, always have, always will. My son went on his first trip when he was 2 months old and hopefully he will get a chance to fish more. When the quota started getting cut I didn't say "I can't handle this", after all it was done to keep the resource sustainable. Cuts kept happening and the charter sector kicked in more. When the hard decisions were being made to protect the resource it became increasingly obvious that the charter industry had ability procrastinate and they were allowed to. Procrastination has led us to this point and it's still going on.

Based on the history of this issue, that's been going on for over 18 years I should be able to write this and get results.

I am a commercial longliner, I cannot handle the cuts made to my halibut quota, my family depends on it as they have for over 30 years. I need you to increase my quota by 8,400 lbs so it is back to where it was years ago and so that my family can survive. Since I need my halibut pounds back I think the GHL should reflect my needs and not the needs of the resource because my needs are more important and if you can't afford to give it all to me I think you should take some from the halibut charter sector because they don't need it as much as I do.

Would I write this? No!, but I will ask that you hold the charter industry accountable. Bottomline, the charter sector has been successfully whining and dining everyone who would listen for years and it's about time someone said "No".

I request that the mgt. system not reallocate my investment to another group. I support Alternative 3 and the CSP allocations set in 2008 should not be changed.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish.

I expect the charter industry to take responsibility, I expect the enabling to stop.

Sincerely,
Karen L. Johnson
Sitka, Alaska

Subject: CSP allocations

From: "Kelly" <ramsfan@alaska.net>

Date: 9/21/2012 7:56 AM

To: <npfmc.comments@noaa.gov>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors.

Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Kelly E. Turner

Anchorage, Ak. 99507

Subject: Mr. Olson and Council members

From: jan storbakken <janstorbakken@yahoo.com>

Date: 9/21/2012 10:56 AM

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

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Jan (Jazzy) Storbakken

Embrace the Buoy!

Craig, Alaska

Subject: halibut give away
From: George <eliason@gci.net>
Date: 9/21/2012 10:36 AM
To: npfmc.comments@noaa.gov

September 20, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I **SUPPORT** the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 **SHOULD NOT** be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When both my sons, my wife and I purchased quota, we did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. To reallocate our shares to another group would be unconscionable. My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota?

The CSP supplemental analysis establishes that commercial fishermen have **LOST** money over the past six years while charter operators have **MADE** money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

George Eliason

F/V Tammy Lin

Sitka, AK

Date: 9-20-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 21 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP) - **SUPPORT for 2008 Allocation Plan**

My family has been providing nutritious, healthy, natural food for people across the nation and the globe for the past three generations. Sustainable commercial fishing for cold water, wild fish is one of the most environmentally and human health friendly food production systems in the world. Additionally, commercial fishing offers some of the few value added service opportunities still presented to the American people, and thus creates local, sustainable jobs for Alaskan and US citizens - from fish handlers, to processors, to value added product manufacturers, to local chefs, delivery and wait staff.

All of these benefits are greatly diminished, if not removed completely when wild stock resources are diverted from the benefit of society to the recreation of a few. I love sport fishing, and I think that it is great that the charter industry allows a few citizens to enjoy the excitement of personal harvest each year. At the end of the day, however, we must acknowledge that charter based access to wild stocks is a privilege reserved for a select few, both in terms of who receives the revenue, and in terms of who can afford access in this way.

In an ideal world, where stocks are unlimited, I would certainly support the ongoing ever-expansion of the charter industry's access to the resource. That is not the world in which we live, however; the stocks are limited, and dwindling. The charter industry has historically proven unable to limit its own consumption of these resources to its allotment.

When dealing with the allocation of a public resource, it becomes the resource manager's job to look for the allocation that provides the greatest overall public benefit and make the hard decisions. In this case, it is clear that the hard truth is that the charter industry must be brought under the same level of management as the commercial fleet has operated under for several years. It is also clear that the balance needs to be restored between the two industries, so that both commercial and sport operations may thrive, and grow in a sustainable fashion.

As such, I **SUPPORT** the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and

equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.**

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Tom Redmond
35865 Sunset Park St.
Soldotna, Alaska 99669
907-262-7844

September 18, 2012

RECEIVED

SEP 21 2012

Mr. Eric Olson, Chair
North Pacific Management Council
605 West 4th Avenue Ste. 306
Anchorage, Ak. 99501

Tom Botts
F/V Bonnie J
P. O Box 424
Hoonah, Ak
99829

Dear Mr. Olson,

Though I signed a generic letter and am in agreement with the contents there in, I felt impressed to let you know that I'm not just another signature on a piece of paper. The regulations and changes that have come down the pike these past years have dramatically impacted my life. At one point I had over 4,000 pounds of halibut quota. This year I was allocated 902 pounds. For reasons that I can not understand, the powers that be decided to play Robin Hood with the halibut quota, but instead of taking from the rich and giving to the poor, the exact opposite occurred. It was no secret to anyone that eventually the charter fleet would have to be limited. There was an explosion of people who saw the writing on the wall and wanted a piece of the pie, so multitudes decided to get into the sport charter business. What I didn't ever expect to happen was to lose what had been allocated to me so that the wealthy could go catch a fish.

Sir, I have been a resident of the Hoonah area since 1976. I started halibut fishing with Captain Bob Clark on the F/V Miss Valerie back in the days of the five day openings. I was happy to see limited entry so we didn't have to risk our lives to make a living. Hoonah doesn't have a lot of economic opportunity. In years like this one, where the salmon run has been so poor, the halibut has helped to offset some of the pain. However, even with a good price, I've lost over half of the income that I had made prior to the drastic reductions in quota.

I didn't mind the reduction if there was a problem with the halibut stocks, but to re-allocate the quota to these Johnnie-come-lately's is an experiment in social equalization or some such thing. The fact is, when I've caught my quota, I'm done for the year. I can make a certain amount of money and no more on my halibut. With the charter fleet, they're making money no matter what they catch. If we're going to allocate funds, I believe I should be on the receiving end. I'd gladly trade what I make from fishing for what the average charter boat captain makes. The fact that they are unhappy with the CSP allocations of 2008 is testimony to the endless greed that is prevalent in sport charter industry.

I hope that you will see the need to stop the endless requests by the sport charter lobby for more halibut at the expense of the commercial fleet and keep the CSP allocations that were set in 2008. Thank you.

Sincerely,



Eric Olson, Chair
North Pacific Fishery Mangement Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501

RECEIVED
SEP 21 2012

September 19, 2012

Dear Mr. Olson,

My name is Daniel Miner and I am the owner of approximately 1,500 halibut IFQ pounds in Area 2C for the 2012 season. I paid \$120,000 for 6,600 pounds about 6 years ago. I am now 60 years old and at my age, fishing in my 38' boat with my wife, do not have time to make up the enormous loss.

As you know, over these 6 years, I have steadily watched my Qs dwindle. It has been painful to have had my Qs reduced while the charter gang continued to overcatch, so I was relieved when the NPFMC finally passed the CSP several years ago following MUCH emotional testimony from both sides.

Now I understand that you are revisiting the CSP and that all the options you are considering would once again move quota from the commercial sector to charter. I find this outrageous. When I purchased quota, it never occurred to me that commercial quota would be reallocated to charter as a result of political interference.

The charter group was already gifted more than their actual harvest and to transfer more to them adds insult to injury. When the CSP analysis shows that commercial sector has lost money in these times of low halibut abundance while charter operators are actually making money, it completely baffles me that you would consider reallocating even more to them.

The CSP allows for leasing of quota via the GAF, so why isn't that the right mechanism for charter operators to follow if they want more fish. Why once again are they being gifted at my expense.

Once again, politics is rearing its head, and so decisions are being based on that rather than the science or actual research into the economic conditions for the user groups.

I hope you and the other council members will find a way to treat the two sectors fairly and not give to charter at the expense of commercial.

Sincerely,



Daniel W Miner
1406 34th St
Anacortes, WA 98221

RECEIVED

SEP 21 2012

September 19,
2012

When the halibut fishing went to quota, I purchased to be able to catch more fish.

I have lost quota shares the last 6 years by 63%.

The Charter boats had an opportunity to go limited entry years ago and didn't.

I see Charter boats going out for two trips a day while I can only catch my dwindling quota.

If charters want more fish, they should buy shares the same as I had to.

John B Herrick
F/V SCANA
P.O. Box 97
Anchor Point, Alaska
99556

September 20, 2012

Mr. Eric Olson, Chair
NPFMC
Anchorage, AK

RECEIVED

SEP 21 2012

RE: C-1 Halibut Catch Sharing Plan (CSP)

I support the CSP percentages adopted in 2008 and strongly urge the Council to stick to the plan you approved. Nothing has changed in your analyses except special interest political interference.

My shares are all purchased with hard-earned dollars and now the Council is considering just taking some away and giving it to someone else for free - this is wrong. Enough is enough.

I have one question - why should one user group (longliners) bear the entire burden of conservation? Should this not be shared by all?

Please recommit your support for your already approved plan.

Sincerely,

Jessie Nelson

Box 130

Norm, AK 99603

Dear Mr Olson,

RECEIVED

SEP 21 2012

Sept. 18, 2012

My name ^{is} Don Welborn I've been Commercial fishing for 35 years from the Mexico border to Alaska. I love what I do, but ~~it has been~~ a tremendous investment of time & resources on the part of my family.

I cannot believe that after GIFTING 25% ABOVE their actual harvest on TWC occasions, you are considering an increase of the charter fleet quota! If they want addition quota, let them BUY IT, like the rest of us!

Sincerely, Don Welborn

9-21-12

Dear Mr Olson,

I support the catch share plan Percentage allocations adopted in 2008 and comments by the Halibut Coalition.

This is a fair way to go about this because it protects historic access to those that have been involved. We need all sectors of the fishing to share in conservation of halibut equally at all levels of abundance. These CSP allocations set in 2008 should not be changed because of political interference. The charter fleet was given 25% above their actual harvest on two occasions and are again trying to increase their allocation by obstructing Rinec regulatory action.

I have bought my quota and now you are reallocating it to another commercial group. The charter fleet needs to be kept to their allocation. I am in support of allowing charter operators being able to lease quota.

I and my family are dependent on income from halibut setline fishing and your reallocation of quota to the charter sector hurts my family and Petersburg that is heavily invested in halibut.

Thank you, Bill Meriand
 mi 12 mtkaol H: Box 877
 Petersburg AK 99833

Alkimail Staff

From: William Curtin <billycrtn@yahoo.com>
Sent: Tuesday, September 18, 2012 11:50 AM
To: Alkimail Staff
Subject: Fwd: HALIBUT csp

9/18/12

Begin forwarded message:

From: William Curtin <williamcrtn@yahoo.com>
Date: September 18, 2012 10:54:24 AM PDT
To: Billy Curtin <billycrtn@yahoo.com>
Subject: HALIBUT csp

To whom it may concern:

I have been a longliner/commercial fishermen for 24 years and a Second Generation Quota share holder. Thanks to NMFS/NOAA I was able to take out a loan for 500,000\$ in order to purchase halibut/ black cod quota shares. Any allocation or "sharing" of quota is essentially taking a part of my investment! Give the charter fleet every opportunity to let them buy or lease quota for their livelihood just as I have! Halibut fishing is an investment it is not a right buy into the fishery and be a steward and pay fish / observer taxes. If the charter fleet wants more Halibut let them lease just like I do!

regards William Curtin
invested longliner

William J. Curtin

Dear Mr. Olson,

My name is Ace Keim. I am a lifelong Alaskan and grew up in commercial fishing family in Homer, AK. I am now 32 years old with a family of my own. Since graduating high school commercial fishing has been my main source of income. I have participated in most every type of commercial fishing Alaska has to offer from crab, to halibut, black cod, grey cod, seining, set netting, gill netting, and tendering.

In the last two years I have taken steps to become an owner in the fisheries I am involved in. I have purchased a Bristol Bay boat and permit as well as 3A halibut quota. I did so knowing that with any type of business venture there are risks involved. Since the purchase of my halibut quota my pounds have dropped in consecutive years. This was a risk I was well aware of when I purchased them. Above all the management of the resource for the long term is the most important thing, so I am not upset about the reduced quota.

Due to the drops in halibut quota the balance of loan has over taken the value of my quota. The money I have made selling my catch has me essentially breaking even over the last two years.

The purchase of my halibut IFQs was a substantial financial investment for me, \$223,000.00 approximately. Currently market value of my quota is around \$170,000.00. If 4% to 5% of my quota was reallocated to charter fishermen I would lose another \$6,800 to \$8,500 in the value of my quota. The approximate market value for that lost quota would be around \$1,400.00 at the current time. This loss of income and equity will make it nearly impossible for me to not be operating at a loss in the upcoming years.

I have spent several of my high school year summers working on different charter boats. I realize that this industry is also important to many Alaskans as a way to provide for their families. I have nothing against the charter fishing industry. I realize that less fish to catch is a hardship for them as well, but it is not reasonable to expect commercial fishermen to GIVE up a portion of their quota to help this industry out. Commercial fishermen have invested lots of money for the right to catch THEIR quota. As the current levels of halibut have dropped it has been hard on both user groups. Taking further amounts of quota (that has been paid for) away from commercial fisherman will make it even more difficult to remain profitable. It would be especially crippling to people like myself who are new to the fishery and have large payments and debt associated with their quota.

I fully support the Guided Angler Fish provision that allows charter fishermen lease quota. If they want more fish to catch, they should also have to invest like I did. An uncompensated reallocation of my quota would be financially devastating to me and my family.

I would love to be able to attend, but I will be working as a deckhand for the 2012 Red King crab season at the time of the meetings. This is my only chance to comment. Please do not give away my quota.

Thank you,
Ace Keim



Fax

To: Eric Olson, Chair From: JAMES MOORE FNAWTAC
 Fax: 907 271-2817 Pages: 2 including Cover
 Phone: _____ Date: 9/20/12
 Ref: _____ CC: _____

Urgent For Review Please Comment Please Reply

PLEASE GIVE CONSIDERATIONS TO THE TROLL
 FLEET ^{IFRA holders} who have ENDURED MANY REDUCTIONS IN
 QUOTAS — ON EVERY FRONT.

We have ~~never~~ sought litigation
 AGAINST THE POWERFUL CHARTER INDUSTRY TO
 LITTLE EFFECT. THEY HAVE MORE MONEY & MORE
 POWERFUL LOBBYIST THAN WE DO.

Our quota has ALREADY GONE DOWN
 TO NOTHING. NOW, THAT LITTLE AMOUNT IS
 COMING UNDER MORE ATTACH.

Thank you James Moore

P.S. please
 LOOK AT
 The records
 of cuts to

Subject: Comments to Agenda number C-1(b) - Charter Halibut CSP

From: Mac <captainmac@alaskasbestlodge.com>

Date: 9/22/2012 10:00 PM

To: <npfmc.comments@noaa.gov>

Chairman Olson and Members of the Council:

I offer the following brief comments via e-mail regarding the Halibut Catch Sharing Plan:

Guided harvests in both Areas 2C and 3A are now within the GHL.

A great deal of energy, and resources are being put forth to bring about a first-ever, ground-breaking compensated reallocation pool plan as envisioned by the CATCH Project.

Given the current environment of compromise, reason and hope, brought about by CATCH, why the rush to final action on a plan with so many outstanding issues, such as the quirks in the CSP allocation matrix, an unworkable, and unpopular GAF provision, a less than perfect sector accountability problem, and the exclusion of the unguided sector, to mention just a few.

And, given the historic and current composition of the Council, and given the flaws in the proposed CSP, it appears certain that the CSP if adopted will only guarantee that the halibut war will continue for decades more into the future. This is not a Final Solution. On the contrary, it will become yet another source of ongoing contention resulting in more wasted time and energy by all concerned.

Give the CATCH Project a chance to develop. It could well resolve this decades long battle once and for all, and, by design, quite possibly with very little involvement by the Council.

Respectfully submitted,

Larry "Mac" McQuarrie

Sportsman's Cove Lodge

P.O. Box 8500

Ketchikan, AK 99901

Phone 1-907-247-7252

Cell 1-907-617-2790

Fax 1-907-247-7255

On the web at <http://www.alaskasbestlodge.com>

Check out the blog at <http://captainmacs.blogspot.com/>

Member of SEAGO, ACA, KGSA, and long-standing member of the Ketchikan Advisory Committee to ADF&G

Member of the following NPFMC Committees: Charter Halibut GHL Committee, Charter Halibut IFQ Committee,

Charter Halibut Stakeholders Committee

Author of Charter Halibut Stakeholder Committee Alternative #6 for the Final Solution of the Charter Halibut allocation issue.

Subject: Bycatch

From: Cash Joyce <cashjoyce@gmail.com>

Date: 9/22/2012 12:53 PM

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

Why not allow all harvested species of fish to count on the quotas. Then allow all to be marketable for that species marketable rate. Of course the undesired species will count as a penalty toward the boats quota. All fish caught will be brought to the dinner table. No want and waste.

\$

Subject: Halibut allocation
From: bergmans <bergmans@gci.net>
Date: 9/22/2012 11:25 AM
To: npfmc.comments@noaa.gov

Chairman Eric Olsen
North Pacific Management Council
605w 4th Ave, Ste 306
Anchorage, AK 99501

Greetings,

I am writing to oppose reallocation of halibut away from the commercial fishery.

I own 1600lbs of 2C halibut. When IFQ's came out I was forced to buy quota if I wanted to keep participating in the halibut fishery. Since then I have lost about 75% of the pounds that I purchased. Now my quota is so small I have a hard time figuring out how much bait to thaw to make a trip. My poundage is so small that I have a hard justifying maintaining my halibut gear. I really need to buy more to make my operation viable. However because the threat of reallocation is looming it makes it hard for potential investors to assume large loans to continue to invest in our business and our communities.

Please provide stability to IFQ investors by maintaining current allocations. Every time that a commercial fisherman gives some to charter operators they are back a few years later wanting more. This cycle seems doomed to continue unless the council stops redistributing "wealth".

Thank you for your service on the council.

Bert Bergman
801 Charles St.
Sitka, AK 99835

Subject: Halibut Catch Sharing Plan
From: "Norris, Jim" <jnorris@anthc.org>
Date: 9/23/2012 10:41 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>
CC: "halibutcoalition@gmail.com" <halibutcoalition@gmail.com>

Eric Olson, Chairman

I live in Hoonah, Alaska and my Halibut Quota helps support my community and family. I've attached a letter of my support for the allocations adopted in 2008, for the catch sharing plan percentages and comments submitted by the Halibut Coalition. The Commercial Halibut fishermen, as well as the communities they live in, have taken a beating in the past several years due to quota reductions, in fact many have lost money and sold their permits. Reallocation of quota to another commercial group ie: Charter Fleet, is a breach of trust. It would make much more sense to allow the Charter Fleet to lease additional quota if they want more fish for their clients. In the same instance, if I want to fish for more Halibut, I have to purchase additional quota. No difference in the two, **pay for any desired additional catch, if it provides more income!!** The leasing of quota would keep funds within the Commercial Fleet and supporting the dwindling Halibut quota incomes. The Charter Fleet has other fish to target, from several species of Salmon to Red Eye, rock fish, and ling cod. We have one fish to target and it is becoming an increasingly more difficult fishery to participate in, with the lowering of quota and politically charged influence of the Charter Industry.

Sincerely

Jim Norris
Alaska Native Tribal Health Consortium
Construction Superintendent
Klawock/Craig
Southeast Alaska
Cell Phone: 723-5403

***In order to resolve a conflict when
dealing with a large beaurocracy,
your persistance must
exceed their incompetence..... -Self***

— Halibut Catch Sharig Plan.jpg —

Subject: 2012 King Salmon By-catch

From: Albert Bowling <zentattoo@yahoo.com>

Date: 9/23/2012 12:05 PM

To: npfmc.comments@noaa.gov

Greetings: I see where the North Pacific Fisheries Management Council will be meeting here in Anchorage during October, but I am unable to attend any meetings. Because of south central Alaska's poor returns of king salmon, I'm interested in the amount of by-catch the large commercial trawler/industry hauled out of the water this year and what happened to those fish.

Thank you, Albert Bowling
7009 Cape Lisburne Loop
Anchorage

Subject: Comments on Halibut Catch Sharing Plan

From: Chris Gabriele <cmg007@gmail.com>

Date: 9/23/2012 3:36 PM

To: npfmc.comments@noaa.gov

To:

Eric Olson

Chair of North Pacific Fishery Management Council

605 West 4th Ave, Ste 306

Anchorage, AK 99501

September 23, 2012

Dear Mr. Olson,

Please consider the following comments on the halibut Catch Sharing Plan for the Oct. 2012 NPFMC meeting. I am a private citizen from Gustavus, Southeast Alaska; I am a marine biologist with more than a passing acquaintance with marine resource issues, but for the purpose of these comments I have no official affiliation or connection to the fisheries industry.

For our Halibut Area 2C my understanding is that the new Preferred Alternative would increase the charter fishery's share of the Combined Catch Limit (commercial + charter catch limit) from 17.3% (in the original plan) to 18.3%. Other options would increase it to 20.8% or 21.8%. I ask that the Council not incorporate any increase at all from the original 17.3%, which was already plenty big, and because the charter fleet has already received two increases.

Additionally, as a local resident who wants a healthy halibut population left for local subsistence, my perception is that the charter fleet and its spin-offs of commercial "self-guided" fishing have the most impact near communities, including Gustavus. We need healthy fisheries within a moderately short skiff ride from town, unlike the charter and commercial fishermen who are equipped and prepared to travel a greater distance to catch fish. The way that the Catch Sharing Plan is handled will have an effect on the local depletion issue.

There are two more issues that warrant the Council's serious attention, so it is also worth pointing out again that:

1) The considerable "release mortality" of charter-caught halibut needs to be accounted for, as it is in the commercial fishery. Day after day over the VHF radio I hear charter fishermen talk about how many "wrong size" fish they catch and release. It is biologically unsupportable to assume that these fish are unharmed by the experience of having been caught.

2) The numerous dodges observed in our area to enable clients to get around the charter catch limits are defeating the purpose of regulation and need to be stopped. We routinely see charter boats with a small skiff anchored within a stone's throw of them, containing clients who are able to fish by the "unguided" regulations. This needs to stop; it is laughable that this is considered a legitimate way to escape the

charter regulations; it makes us all look like buffoons. If this infuriating and ridiculous loophole cannot be repaired, then the catch sharing regulations themselves need to incorporate this increased 'private' catch into the models that estimate the effects of the charter fishery, because it is a direct effect of the charter fishery.

Thank you for your consideration.

Sincerely,
Christine Gabriele
Gustavus, Alaska

Subject: Support for 2008 csp
From: Otto <flrschtz@aptalaska.net>
Date: 9/23/2012 9:48 PM
To: <npfmc.comments@noaa.gov>

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Ave, Ste 306

Anchorage, AK 99501

Otto Florschutz

bx 547

Wrangell, AK 99929

I support the 2008 csp and oppose moving any allocation from the commercial sector to the charter sector. Any such allocation movement would be the worst of thievery. Instead allow them to lease or buy poundage from the commercial sector. The guided industry has benefited greatly even while the commercial sector has struggled to meet payments in the face of dropping x vessel prices and low quotas and guide industry overages. Please support the 2008 plan that was arrived at with much cost and compromise from the commercial sector.

Otto Florschutz

Subject: -1 Halibut Catch Sharing Plan (CSP)
From: "Daniel Miller" <dmiller@acsalaska.net>
Date: 9/24/2012 3:38 AM
To: <npfmc.comments@noaa.gov>

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

Over fifty percent of my income comes from IFQ halibut fishing. My crew are my daughter and son in law. I recently delivered my halibut quota for over a dollar a pound less than 2011. With the drastic quota cuts I have less than 20,000 lb of halibut to fish. I can hardly afford to allocate part of my quota to another user group. I purchased almost all of my current quota. Since then the bycatch rates of the trawl flatfish and cod and longline cod have dramatically increased in relation to the commercial halibut quota. I cannot afford to take another cut.

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the

halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Daniel R. Miller

Box 2865

Kodiak, Ak 99615

Owner Operator F/V Anna D

RECEIVED
SEP 24 2012

Subject: comment...

From: deborah limacher <debaloha@hotmail.com>

Date: 9/24/2012 8:53 AM

To: <npfmc.comments@noaa.gov>

To NPFMC, I have been a commercial fisherwoman since 1976 and have longlined halibut and crabbed the entire crab fishery and of late,I am an eastside setnetter here In Cook Inlet.As you know, our fishery was shut down this summer and I lost 1000's of dollars along with my crew losing all their hoped for summer wages.Fishing,along with a small amount of money for a vacation rental is my only means of support.I also realize that the chinook fishery is in a major downturn and I believe that this is due largely to the bycatch of the king salmon esp. in the Gulf of Alaska trawl fisheries.I also believe that using the word "by-catch" is an incomplete way to describe the wanton waste of our breed stock of kings!! I am asking the council to oritize observer coverage for these fisheries with bycatch concerns,as I said before,esp. the Gulf of Alaska trawl fishery that wastes thousands of pounds of chinook,halibut and tanner crab each year.We should also have increased monitoring so that these boats are being monitored 24/7..We need more data to understand the impacts of this.I also support the need for electronic monitoring as a viable at-sea monitoring program as an alternative to human observers. Thank you,deborah limacher,Pobox3001,Homer,Ak.99603

FROM: 066409
L RYGGGS

RECEIVED
SEP 24 2012

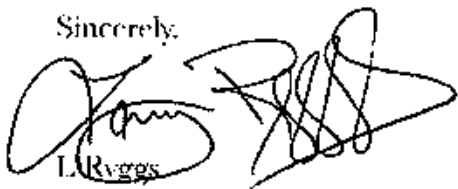
September 24, 2012

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the set-line fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,



L. Rygggs

Ketchikan, Alaska

Arthur & Linnea Osborne
F/V Mongoose
P.O. Box 240925
Douglas, Alaska 99824

RECEIVED
SEP 24 2012

September 24, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

We SUPPORT the catch sharing plan percentage allocations adopted in 2008. We urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.**

When we supported the adoption of the IFQ program, we did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of

longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? We have, as do all businesses.

We support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. We support the GAF provision. What we cannot support is yet another reallocation to the charter operators of the halibut quota. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,


Arthur & Linnea Osborne

F/V Mongoose

P.O. Box 240925

Douglas, Alaska 99824

RECEIVED
SEP 24 2008

Mr. Eric Olson, Chair
North Pacific Fishery Management Council

Mr. Olson,

I write to express my support for the existing CSP percentage allocations (2008) for the Alaskan commercial halibut fishery.

I have been involved in the commercial halibut fishery for 7 years—a short amount of time in comparison to many who founded their careers when it was still an open-access fishery. In light of this, my participation in the fishery and my economic success depend solely on the ability to purchase and fish IFQ shares.

I am young, 26 to be specific, and plan to accept a NMFS loan in the next year in order to purchase more halibut quota. I depend on the ability to garner a living from within the shadow of this debt, and reallocation plans raise serious doubts as to whether or not I will be able to do so. Reductions and reallocations of quota contribute strongly to my concerns of financial viability. My halibut quota in Area 2C has been reduced by about 75% since it was purchased, while the price-per-pound for IFQ has increased dramatically. To watch my right to fish dwindle steadily through quota reductions each year is depressing, but to see it repartitioned yet again and distributed to charter operations is simply infuriating.

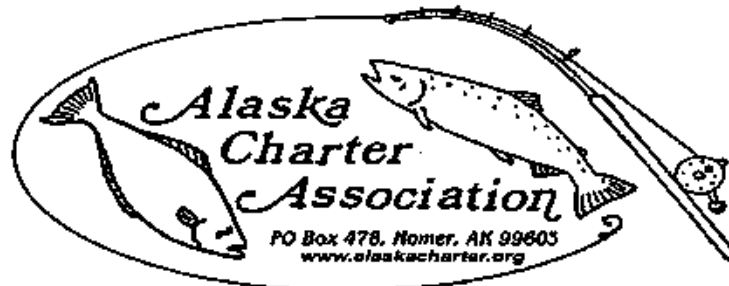
Young fishermen are being precluded from building careers in the fishing industry by a multitude of factors. Most prominent among these are the rising price of permits and IFQ, and the reallocation of commercial quota. As a younger class of commercial fishermen attempting to create solid foundations of a career in the longlining industry, we are drastically affected by this seemingly exponential increase in expense. Our margins will remain on the small side, but we look forward to the potential of purchasing more quota in order to increase our stake in the fishery—not to maintain a microscopic one that is undeservedly and illogically shared by charter operations.

I understand that tourism and the charter industry occupy an important place in Alaska's economic structure as well as its cultural persona. However, I urge you to remember that the true backbone of this state is maintained by the commercial fishing industry, as it has been for a long time now. My father worked his way up on the docks here when he was 19 years old. He built his career crabbing in the Bering Sea and maintains it now as a longliner. I have been fishing with him since I was fifteen, and together we share ownership of a boat with one of my cousins. It is absolutely a family operation, and I am proud to say that I am a second-generation fisherman. We all own halibut quota, and we all are strongly opposed to further reallocations of our quota to charter operations. I would like to feel convinced of the enduring viability of the industry that each of us have committed so fully to.

Thank you for your time,

Kyle J. Thompson
F/V Aleutian Sun

RECEIVED
SEP 24 2012



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

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

Re: Agenda Item C1b, Halibut CSP

September 22, 2012

Dear Chairman Olson,

The Alaska Charter Association (ACA) is a statewide organization representing over 150 charter and associated businesses. 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 ACA thanks the North Council for its April motion on the halibut catch sharing plan (CSP). The motion has the potential to resolve a number of problems that were identified in comments on the proposed rule. However, issues remain with guided recreational allocation alternatives, sector accountability, the committee based approach to harvest management, guided angler fish (GAF), skipper and crew retention of halibut and sector separation.

Allocation

The April discussion of the CSP allocation included new allocation options for Areas 2C and 3A as well as allocation adjustments resulting from the transition to logbook based harvest accounting. Sector accountability was also added for analysis. It is important that each of these issues is considered individually, as each has allocative implications that must be fully understood before implementation.

The April and June motions propose to adopt the charter logbooks as the primary harvest data collection method, and include an allocation adjustment factor of 11.6% for Area 3A and 5.6% in Area 2C.

Options 1 and 2¹ from the April motion establish a new allocation alternative that adds 3.5% of the combined catch limits to the original CSP allocation and includes a second decrease in allocation percentage at high abundance levels.

¹ Options 1 and 2 are also referred to as Alternative 5 in the analysis.

Figure 1 compares a logbook adjusted GHL with the logbook adjusted Alternative 5 for Area 2C².

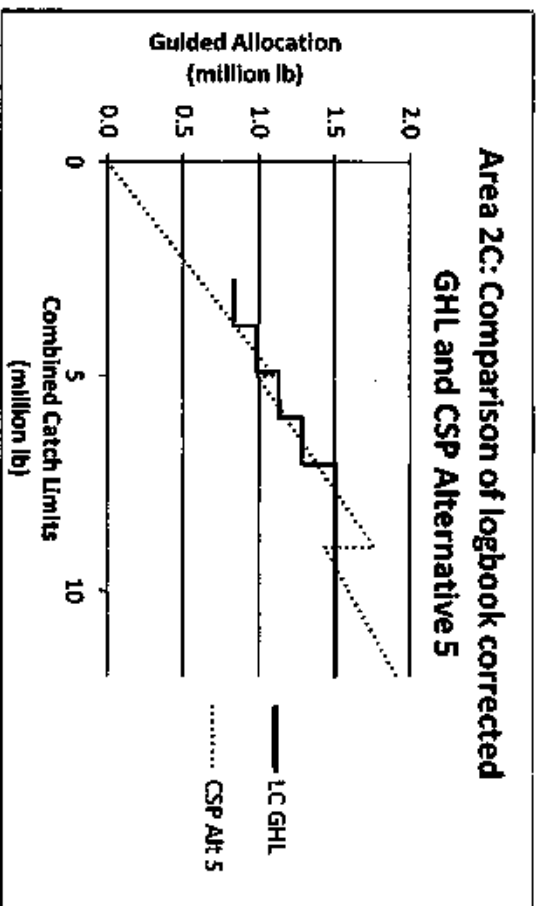


Figure 1

Figure 2 compares a logbook adjusted GHL with the logbook adjusted CSP Alternative 5 for Area 3A³.

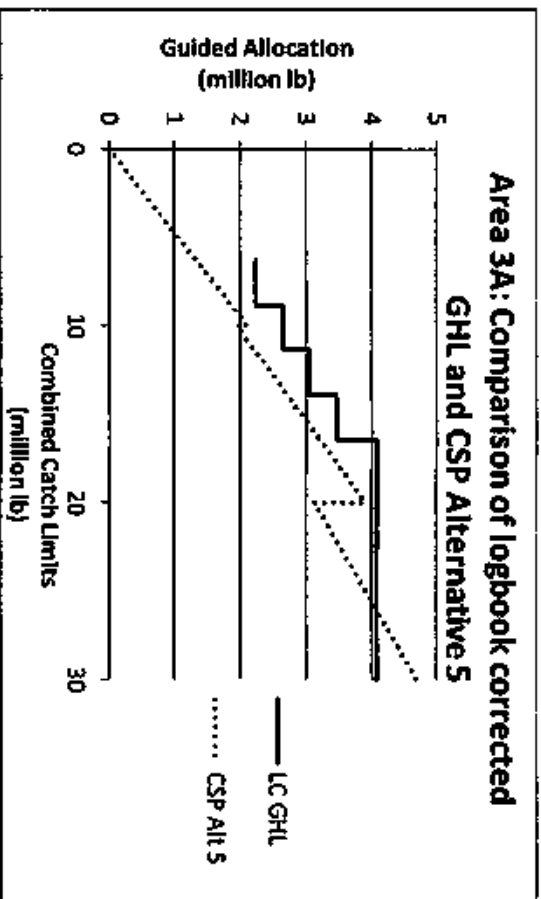


Figure 2

Reviewing Figures 1 and 2, it is clear that while the newly suggested alternative for Area 2C is more closely aligned with the GHL, the new alternative for Area 3A remains well below the GHL at all but the highest

² Uses average of area 2C 2011-2012 IPHC other removals minus GHL = 1,995 million pounds for calculations

³ Uses average of area 3A 2011-2012 IPHC other removals minus GHL = 5,134 million pounds for calculations

abundance levels. In fact, at combined catch limits of just over 20 million pounds in Area 3A, the guided allocation under option 2 is close to one million pounds less than the GHL.

The ACA notes that very similar comparisons are made on pages 184 and 186 of the analysis, but using both low and high values of historical other removals to depict the GHL. The ACA points out that since 2011, the IPHC has included O26/U32 bycatch and wastage in other removals and this methodology is in place moving forward. The ACA also notes that the effect of this change is more pronounced in Area 3A than it is in area 2C. As a result of the IPHC changes, the dotted GHL (high) depictions on pages 184 and 186 more accurately reflect comparisons of the GHL and CSP allocations moving forward from the present.

Incorrect Alternative 5 Numerical Comparisons

The ACA suggests that tables 2-45 on page 190 and 2-52 on page 194 are in error. These tables numerically compare CSP options 1 and 2 (Alternative 5) with the GHL, assuming either allocation had been in place from 2008 through 2012. In these tables, Alternative 5 includes an adjustment for the migration to logbook accounting and the GHL does not. In essence, these comparisons are being made using two different metrics, logbook pounds and Statewide Harvest Survey pounds. ***In order to make meaningful comparisons, the allocations being compared must be measured using the same yardstick.*** Correct comparisons are illustrated graphically in Figures 2-20⁴ and 2-22⁵ on pages 184 and 186 of the analysis. The same error applies to the addendum to the analysis posted on 9/21/12⁶.

Allocation Jinks

Commenting last year on the CSP proposed rule, the ACA and others noted the “jinks” in the 2C and 3A preferred alternatives. The jinks are plainly visible in Figures 1 and 2. ***In each area, crossing a jink with increasing abundance results in a decrease in guided recreational allocation.*** Options 1 and 2 from the April motion add a second jink to each allocation alternative. Crossing the first jink in Area 2C results in a 10.6% decrease in allocation; crossing the second jink with increasing combined catch limits results in a 332 thousand pound, 18.8% decrease in allocation. Crossing the first jink in Area 3A results in a 7.4% decrease in allocation; crossing the second jink results in a 781 thousand pound, 20.0% decrease in allocation⁷. ***Combined catch limits would have to increase to over 25 million pounds before the Area 3A guided allocation once again exceeded the Area 3A guided allocation at a CCL of just under 20 million pounds.*** The ACA strongly suggests that the allocation jinks are counterintuitive if a goal of the CSP is to establish a guided allocation that floats up and down with abundance throughout its entire range.

⁴ http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/HalibutCSP_912.pdf

page 184. Note the high limit of the 2C GHL has been adjusted by 5.6% from 1.432 million pounds to 1.51 million pounds.

⁵ http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/HalibutCSP_912.pdf

page 186. Note the high limit of the 3A GHL has been adjusted by 11.6% from 3.65 million pounds to 4.07 million pounds.

⁶ <http://www.alaskafisheries.noaa.gov/npfmc/PDFdocuments/halibut/CSPalternativeCompare912.pdf>

⁷ All calculations made assuming Options 1 and 2 have logbook adjustments applied.

The ACA thanks NMFS for inclusion of an analysis of the jinks.⁸ At the time of this writing, the ACA understands that option 4 on page 196 may be the Council's choice to correct this problem. Option 4 draws a flat line from the tip of the jink right to its intersection with the new allocation percentage. This results in a fixed CSP allocation for the width of the flat line. *The ACA notes that in the case of Area 3A, flat-lining at the second, high abundance jink in Alternative 5 would result in the CSP allocation being fixed for a combined CCL range of about 5 million pounds. This fixed level would be several hundred thousand pounds below the GHl, at a level that would likely result in harvest restrictions for 3A guided anglers at pre-recession angler effort.* The ACA suggests that this approach also results in an allocation that arguably does not float with abundance and notes that once again the difference is being reallocated to the commercial sector.

The ACA notes the absence of graphical representations of the area 3A Alternative 5 with flat-lining option 4 applied. Likewise, other options for fixing the jinks are missing graphs that depict the result in each area. Finally, numerical comparisons of all allocation alternatives and logbook corrected GHl, including the suggested corrections for the jinks are absent from the jink (drops) analysis. *The ACA suggests that all of the aforementioned gaps in the analysis should be filled in order for the North Council to make an informed decision on applying fixes to the allocation jinks.*

Finally, the ACA notes the following comment in the analysis on the effect of flat-lining the jinks:

"While the charter sector would receive no benefit from the increase in the CCL until the lower percentage allocation matched the high percentage allocation, the sector would also suffer no loss in that range, as its allocation would remain constant"⁹

The ACA takes exception with this statement. *If the goal of the CSP motion is combined catch limits that fully float with abundance,¹⁰ then with flat-lining, the guided sector loses (and the commercial sector gains) the difference between the fixed allocation and an allocation that floats up and down with abundance throughout its entire range.*

The ACA suggests that a more reasonable approach to repairing the jinks is to continue the next allocation percentage from the peak of the jink as described in option 2¹¹. In the case of alternative 5, this results in 3 connected linear segments with no jinks. The ACA has applied this approach in the formulation of its recommended allocation alternatives.

Fairness and Equity

The ACA notes that a one pound decrease in guided allocation relative to the GHl represents a one pound reallocation to the commercial sector. The Halibut Act states that if it becomes necessary to allocate or assign halibut fishing privileges among various United States fishermen, such allocation shall be fair and equitable to all such fishermen. In *Van Valin v Locke*, Judge Collyer stated that the Court must examine the record as a whole in order to determine the fairness and equity of the allocation and whether the Secretary

⁸ NMFS refers to the jinks as "drops". http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/HalibutCSP_912.pdf page 195.

⁹ http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/HalibutCSP_912.pdf P 199

¹⁰ "Share the pain, share the gain"

¹¹ http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/HalibutCSP_912.pdf page 195

had adequately explained the rationale behind the Final Rule¹². In Van Valin, the Court affirmed that the allocation (GHL) was fair and equitable. The ACA suggests that in the case of the CSP, there is no basis in the public record justifying a decrease in the guided halibut allocation from the status quo GHL and the resultant reallocation of the resource to the commercial sector.

Suggested Allocation Alternatives

It is a simple exercise in linear algebra to develop guided recreational allocations that float with abundance without jinks or flat-lining while much more closely matching the status quo GHL allocations. The ACA suggests amending Alternative 5 per Figures 3 and 4 to accomplish this goal. By design, the suggested allocation alternatives mathematically split the GHL stair steps in both areas. These allocation alternatives are well within the logbook adjusted range of alternatives originally chosen for analysis. *The ACA asks the Council to adopt the suggested alternatives.*

Area 2C Suggested Alternative (including 5.6% logbook adjustment)

- Combined Catch Limits (CCL) < 3.315 m pounds: 25.1% of CCL
- 3.315 m pounds >= CCL < 7.77 m pounds: 326.8k pounds + 15.24% of CCL
- CCL >= 7.77 m pounds: 690.9k pounds + 10.56% of CCL

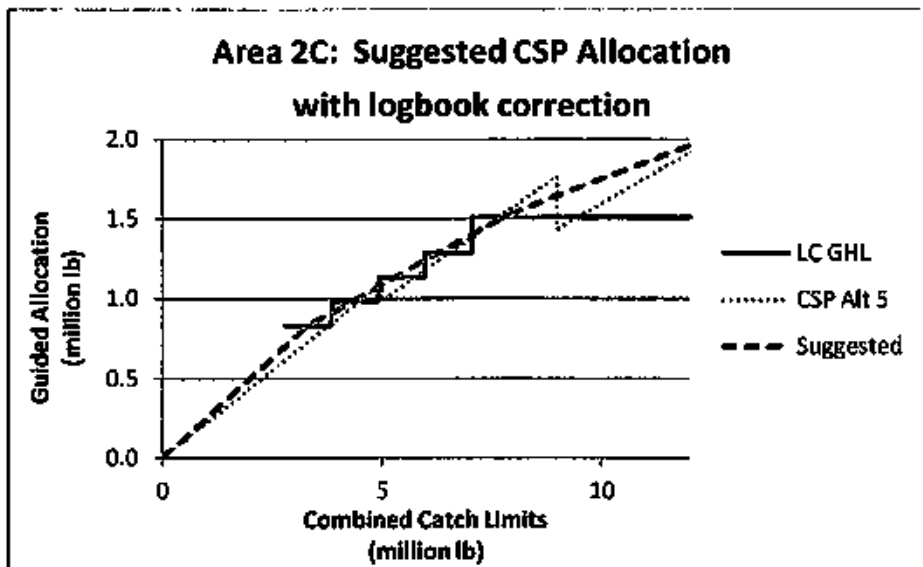


Figure 3

¹² Van Valin v Locke, Memorandum Opinion, filed 11/23/09, available at: <http://www.fakr.noaa.gov/sustainablefisheries/halibut/chapter/opinion112309.pdf> page 10.

Area 3A Suggested Alternative (includes 11.6% logbook adjustment)

Combined Catch Limits (CCL) < 7.56 m pounds: 29.6% of CCL

7.56 m pounds >= CCL < 18.22 m pounds: 941k pounds + 17.19% of CCL

CCL >= 18.22 m pounds: 2.24 m pounds + 10.04% of CCL

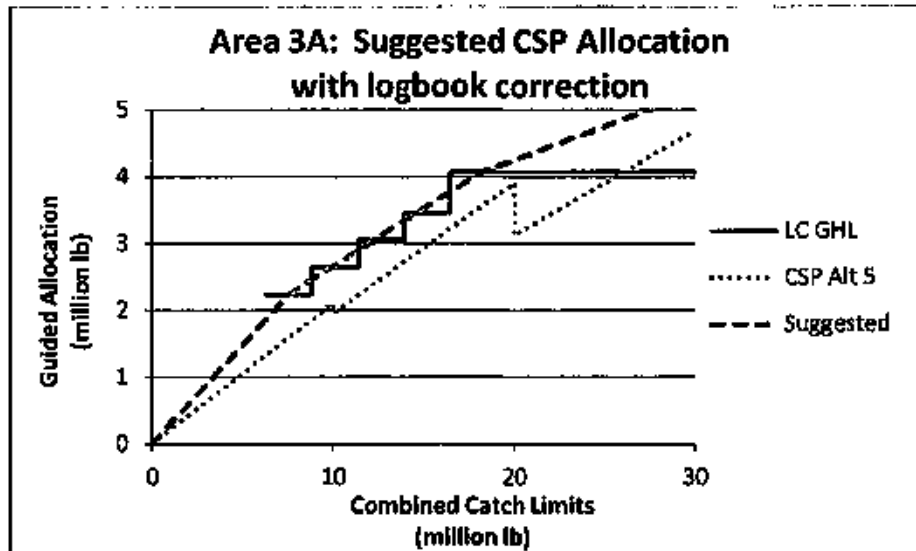


Figure 4

Sector Accountability

While the ACA enthusiastically agrees with the philosophy that each sector should be accountable for all of its removals, we make the following observations:

1. Accurate estimates of wastage and/or bycatch are necessary to implement sector accountability. *If the estimated wastage for either sector is incorrect, the change to sector accountability will result in unanticipated allocation shifts.* Wastage estimates could be inaccurate due to incorrect released fish mortality estimates. The last scientific study of released fish mortality for Pacific halibut was done in 1958 and 1960 and was conducted to estimate tagging mortality¹³. The study was conducted using J hooks and the sample size was greatly reduced due to elevated water temperatures that killed a number of fish in the study. Using a total of 120 fish, the study estimated a mortality of 3.8% resulting from capture and tagging. Wastage estimates are also based on the number of released fish; in the absence of actual observations of released fish, it is likely that these estimates are incorrect. Likewise, with less than 100% observer coverage in the non-directed fisheries, bycatch estimates could be inaccurate.
2. The IPHC recently began deducting over 26 inch, under 32 inch (O26/U32) bycatch and wastage from the O32 total CEY in its catch limits setting process. Bycatch represents a substantial portion of these removals; if the guided recreational and commercial sectors are going to be held

¹³ IPHC Scientific Report No. 52, Viability of tagged Pacific halibut. Gordon J. Peltonen. 25 p. (published 1969) <http://www.iphc.int/publications/scirep/Report0052.pdf>

accountable for their wastage, then they should not be penalized by the removal of O26/U32 trawl bycatch from the O32 total CEY. ***If sector accountability is the goal, then it must apply to all sectors, and non-directed removals should not come at the expense of directed fishery catch limits.***

The ACA suggests that a scientific study of released halibut mortality using modern gear is long overdue, and cautions that prior to adopting full sector accountability, it would be wise for the both IPHC and the North Council to carefully analyze the economic and allocative consequences of doing so using incomplete or inaccurate data.

The ACA concludes that while sector accountability is a desirable goal, the mortality metrics and tools needed to implement sector accountability are not yet available.

Committee process

The ACA is encouraged that the North Council has considered dispensing with the CSP matrix in favor of a committee-based approach¹⁴. However, the ACA remains concerned that the approach utilized in setting harvest restrictions in Area 2C in 2012 largely left the public out of the decision making process. The ACA feels that the provisions for public participation and judicial review mandated by the Administrative Procedures Act (APA) are very important components in the Council rulemaking process. The ACA reminds the Council that the comments of over 4000 citizens directly resulted in the Council's reconsideration of its 2008 CSP motion. ***The ACA suggests that a public comment period should be included in the committee-based approach and notes that ample time exists after the IPHC annual meeting to implement harvest restrictions using an expedited rulemaking process similar to the process used in 2007 for Area 2C.***

The ACA also suggests that in adopting a committee-based approach, the process should be formalized to include SSC review of committee recommendations and to assure a well-balanced committee membership consisting of recreational anglers as well as charter operators. In addition, committee membership terms should be specified.

Guided Angler Fish (GAF)

The ACA notes the obvious inequity in a proposed rule that first reallocates a substantial portion of the GHL to the commercial sector and then allows the guided sector to rent it back.

The ACA suggests that GAF are problematic for a number of reasons:

- GAF do not constitute a permanent allocation transfer mechanism, but rather a one-time resale of commercial IFQ to an individual member of the public.

¹⁴ This approach is referred to as the "2012 Model" in the April motion, available at: <http://www.fakr.noaa.gov/nofmc/PDFdocuments/halibut/CSPmotion412.pdf>

- GAF is proposed as a transfer mechanism that is supposed to help provide stability and predictability to the charter sector in times of low abundance. However, since no one will know in advance how much IFQ will be available to lease each year and at what price, it will be impossible to market trips a season in advance.
- GAF will result in absentee ownership of QS. In developing the halibut QS program, the North Council went to great lengths to minimize absentee ownership of QS. By approving GAF, the Council would now allow holders of 1500 pounds of IFQ to lease it all without fishing it.
- **GAF implementation and enforcement costs have not been included in the analysis.** GAF accountability will require on the water enforcement. Many of the charter operations that might be expected to utilize GAF are in remote locations, requiring time consuming and costly visits by enforcement personnel by boat or floatplane. When the North Council was considering an annual limit for guided anglers in area 2C, the cost of reporting implementation alone was estimated to be \$600k¹⁵. Absent analysis of the cost of GAF implementation and enforcement, the Council may well be writing a blank check that it cannot afford.
- While GAF would only be implemented in areas 2C and 3A and will never be implemented in any other regulatory areas, GAF implementation and enforcement costs will result in higher cost recovery fees assessed to all halibut and sablefish QS holders in all Alaskan regulatory areas¹⁶.
- GAF favors large, well-financed charter operations over smaller "mom and pop" operations.
- GAF favors wealthy charter clients over guided anglers with more limited budgets.
- If GAF is widely utilized, smaller blocks of QS are likely to be tied up as GAF, reducing the number of entry level opportunities for commercial fishermen.
- If widely accepted by the charter fleet, competition between hundreds of charter operators for GAF would drive the price of GAF up, in turn increasing the price of commercial QS, making entry level opportunities for commercial fishermen even more expensive than they are at present.
- At current abundance levels, there is not enough GAF available in Area 2C to make it a viable option.
- Proposed limitations on GAF purchases by CHP holders discriminate without reason between holders of single CHPS with more than 6 endorsements and those with 6 or fewer endorsements.

Public testimony at the April 2012 North Council meeting was overwhelmingly against GAF and in favor of a pool-based compensated allocation shift mechanism, where a holding entity would purchase commercial QS on the open market and use the QS to transparently supplement the baseline guided recreational allocation in each area. The ACA believes that a well-designed, pool-based allocation transfer mechanism would eliminate most of the problems that have been identified with GAF while also implementing charter sector accountability. NPFMC legal counsel has indicated there are few if any legal obstacles to the formation of a holding entity such as that envisioned by the CATCH project.

¹⁵ December 2006 Council minutes, available at

<http://www.fakr.noaa.gov/npfmc/PDFdocuments/minutes/Council1206.pdf>, page 9

¹⁶ http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/HalibutCSP_912.pdf, page 244

The ACA asks the North Council to defer implementation of the GAF provisions of the CSP and initiate a comparative analysis of the pool-based and GAF approaches with an emphasis on the thorough analysis of the economic consequences of each approach.

Skipper and Crew Retention of Halibut

The proposed rule for the CSP contains an outright ban on halibut harvest by skipper and crew. Under the CSP, the only time a charter vessel guide or crew member can harvest a halibut is on a non-charter trip. This is very expensive, since it implies a non-revenue day, fuel expenses commensurate with a normal charter trip and unnecessary wear and tear on the boat. The Council's analysis did not consider anything other than an outright ban on skipper and crew harvest when other options exist.

The ACA asks the North Council to analyze annual limits for charter skippers and crew as an alternative to an outright ban on harvest.

Sector Separation

The Alaska halibut fishery is to our knowledge the only federally managed recreational fishery with differing harvest limits for guided and unguided recreational anglers. The ACA suggests that splitting of the recreational sector into guided and unguided sub-sectors is problematic for the following reasons:

- The Halibut Act requires that if it becomes necessary to allocate or assign halibut fishing privileges among various United States fishermen, such allocation shall be fair and equitable to all such fishermen¹⁷. An allocation scheme that differentiates between guided and unguided recreational anglers is arguably not fair and equitable because it discriminates between recreational anglers who for financial, health or safety reasons must fish from a charter boat and recreational anglers with access to a private boat.
- Guided harvest bag limits that are more restrictive than unguided limits have been proven to result in leakage from guided to unguided access. In 2007, the first year of guided harvest restrictions in area 2C, the unguided harvest jumped by 54.5%¹⁸. Harvest accountability is not achieved if guided recreational harvest restrictions simply result in leakage from guided to unguided harvest.
- ***Safety is compromised.*** Thanks to strict Coast Guard regulations governing charter boat operations, the Alaskan charter fleet provides by far the safest form of marine access to the halibut resource. Any leakage of harvest from guided to unguided sub-sectors comes with a measurable decrease in safety. National Standard 10 mandates that conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.

The ACA suggests that the only way to fairly allocate recreational fishing privileges safely and with full sector accountability is to manage the guided and unguided recreational harvest under a single set of harvest rules and reporting requirements.

¹⁷ 16 USC § 773C

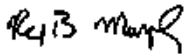
¹⁸ http://www.fakr.noaa.gov/npfmc/PDFdocuments/halibut/2C3A_adfg2011estimates0912.pdf

Conclusions

In closing, the ACA notes that guided harvests in Areas 2C and 3A are within allocation. There is no need to rush to final action a second time on a plan with so many outstanding issues. At a minimum, the CSP allocation requires revision and GAF implementation should be deferred until a comparative analysis of GAF and CATCH is complete. The ACA suggests that a wiser approach might be to revise the CSP to include the entire recreational sector. Taking this route would solve the issues with guided and unguided accountability and sector separation, while allowing the time needed to analyze a permanent allocation transfer mechanism and sector accountability.

The ACA thanks the North Council for its careful consideration of its comments.

Respectfully,



Rex Murphy
Alaska Charter Association

Subject: CSP
From: John Stack <jastack3@gmail.com>
Date: 9/24/2012 12:44 PM
To: npfmc.comments@noaa.gov

September 24, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.**

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

John Stack

P.O. Box 1983, Cordova, AK 99574

Subject: proposed reallocation of halibut quota
From: Paul Reed <towerkiva@yahoo.com>
Date: 9/24/2012 12:45 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Mr. Olson and Council Members,

As an American consumer my access to halibut is through the Alaska halibut fishermen and processors. Without their efforts, we would not be able to purchase halibut in markets or enjoy it at restaurants.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed.

Sincerely,

Paul F. Reed

Archaeologist
Archaeology Southwest
Bloomfield, NM 87413
505-632-0657
preed@archaeologysouthwest.org
www.archaeologysouthwest.org

Subject: C-1 Halibut Catch Sharing Plan (CSP)
From: Chuck Cohen <kodzoff@alaska.com>
Date: 9/24/2012 12:32 PM
To: npfmc.comments@noaa.gov
CC: halibutcoalition@gmail.com

Chuck & Kathryn Cohen
F/V LADY BARBARA
P.O. Box 020670
Juneau, Alaska 99802

September 21, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export.

When I acquired quota, I did not expect that the NPFMC would reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why

shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to acquire over the past 30 years. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Chuck & Kathryn Cohen

Subject: Fw: Halibut slamming by charters

From: jan storbakken <janstorbakken@yahoo.com>

Date: 9/21/2012 3:57 PM

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

Maybe a duplicate?

I often hear the charter squads, bemoan they got another halibut. They also have no respect for the big momma's. The bigger the better even if they do not eat them. Commercial fisherman and their families care about the fish!!!! They know they have to preserve them. Charter fisherman just want to keep their customers happy. They care, but they are need to have happy fisherman and after someone forks out \$2,000 for a fishing trip they want a big fish. This year was a hard year on Salmon. I can honestly say I heard 4 different individuals(tourists) say I only got a halibut. With a sigh. I love halibut! Please see the responsible commercial fisherman get their quota!!!!

The same goes for hunters as well. Folks were asking if anyone wanted some bear, because the hunters got their trophy.

I am a resident of Prince of Wales. I live in an economically challenged area. I gather berries, hope to get fish and crab to eat or can. Please protect our resources and let the folks that really care about their fish and environment have the reins to protect our fish!!!!

Giving that responsibility to the charters, which in turn go to the tourists. Is not responsible.

Jan (Jazzy) Storbakken

Embrace the Buoy!

Subject: Comments on the Halibut Charter Issue

From: Carl Peterson <kalitan97828@yahoo.com>

Date: 9/24/2012 2:06 PM

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

CC: SEAFA <seafa@gci.net>, Alaska Longline Fishermans Association <alfa.staff@gmail.com>

North Pacific Fishery Management Council
605 W 4th Avenue Suite 306
Anchorage, Alaska

Dear Council Members,

I am a lifelong Alaskan and a commercial troller. While I participated in the halibut fishery before and during some of the derby days I do not own any quota shares, however, both my sons do own small amounts. I am concerned about two aspects of this debate. The first is the matter of fairness. When the biomass fluxuates all user group shares should reflect the increase or decrease more or less equally. It is my understanding that one of the proposals before the council would allow sport charters to lease IFQ shares. This seems to me to be a logical and fair solution which will allow charter operators in years of low abundance sufficient fish to meet their customer's needs. The majority of the commercial fishermen have made an investment in their fishery by buying quota shares—does it not seem fair that the charter operators increase their share of the pie by doing the same?

The second aspect that concerns me is the inability of the process to reach a conclusion. The reduction of quota has caused a huge amount of instability in the industry as commercial fishermen and charter boat operators struggle to make a living and make payments. The inability of reach a conclusion to this process and can only add to the concerns of both fleets.

The bottom line is that I urge the council to approve the the alternative that provides the allocation level recommended by the Council at the October 2008 meeting along with the management measures recommended by the council at that time. I urge the council not to buckle to political pressure from well funded and organized outside groups.

Sincerely,

*Carl A. Peterson
f/v Last Dance*

9/14/12
Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 W. 4th Ave, Ste. 306
Anchorage, AK 99501

RECEIVED
SEP 24 2012

Mr. Olson,

I am writing to you to express my support for the catch sharing plan percentage allocations adopted in 2008 for the Alaskan commercial halibut fishery.

I am a young fisherman currently six figures in debt with a NMFS loan. 100% of my income and the security of my family are dependent upon commercial fishing. That income is dependent on my ability to meet my loan payments so that I have quota to fish. In an era of dramatically reduced 2C and 3A quotas for reasons of fishery health, the prospect of reallocation of the harvest ratio to the detriment of commercial longliners raises serious financial concerns for me.

In the years I have been involved in commercial longlining my 2C quota alone has been reduced by 80% while the price per pound for IFQ has skyrocketed. The high price of IFQ now makes it financially unfeasible to enter into a traditional bank loan to buy quota. I do not have access to the several hundred thousand or even millions of dollars of capital required to purchase enough quota to start a self-sustaining longline operation and do not have any gifted quota from previous catch history during open access. My only viable option is the beneficial terms of a NMFS loan. These loan terms are designed to aid fisherman like me in acquiring the aforementioned startup capital to purchase IFQ. If the harvest ratio is reallocated between the commercial and charter sectors and the price of IFQ continues to rise I have serious concerns as to whether the profit margin of my IFQ will be large enough to allow me to make my loan payments and save enough money to purchase more IFQ in the future, despite the advantageous terms of a NMFS loan.

Now that the days of open access halibut longlining are gone, the only way to enter the commercial halibut fishery for a longliner is to purchase existing quota. For the younger generation of commercial fisherman, of which I am one, the only way to acquire the capital needed to purchase IFQ is by taking on a staggering amount of debt. The overall startup cost of a charter business is orders of magnitude lower than that of a commercial operation and they do not have to purchase quota. Therefore, it is fair that they lease additional quota for their clients through the Guided Angler Provision (GAP). It is not fair to reallocate an already diminishing resource in their favor without compensation to the commercial longline sector. I have put the financial

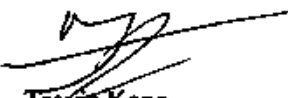
security of my family and myself at risk to enter the commercial halibut fishery and I think it is equitable to ask commercial charter operators to do the same.

Young fishermen are slowly being priced out of the commercial fishing industry by the rising costs of everything from IFQ to fuel to a bale of seine web. This trend risks the long term viability of the tradition and heritage of our industry, the financial welfare of the commercial fleet, and consumer access to an increasingly valuable source of protein. It is paramount that the management council considers the priorities of resource allocation and the effect it has on consumer access to fishery resources. The charter fleet provides a "luxury" opportunity for a tiny percentage of American consumers to access the resource by taking them to the fish. The commercial longline fleet on the other hand allows a drastically larger percentage of American consumers access to the resource by bringing the fish to them. It therefore becomes the council's mandate to decide whether this resource exists to satisfy the desire for a boutique fishing experience for the rich or to satisfy the right of normal American families to access a sustainable and healthy source of protein.

If charter operators want more fish for their clients provisions exist for them to lease quota from commercial operators. These provisions begin to close the investment gap between the two sectors of the allocation plan in an equitable manner. If I want more fish to catch and thereby increase the financial viability of my business I am required to invest more money thru the purchase or leasing of additional IFQ. I do not consider it unreasonable to expect that the charter fleet operate under the same parameters and assume the same financial risks inherent to the acquisition of capital. I do consider it unreasonable, inequitable, and unfair for the NPFMC to reallocate my investment to another commercial group without compensation. Such a reallocation is particularly unfair when it undermines my financial stability and that of my family without requiring a similar assumption of financial risk from the charter fleet.

Thank you for time and the opportunity to comment.

Sincerely,



Travis Kapp
P.O. Box 713
Petersburg, AK 99833

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-18-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 24 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: ELBRIDGE G. WALKER

Address: 30588 N. MILLER RD, SCOTTSDALE, AZ 85266

— SEE REVERSE FOR ADDITIONAL COMMENTS —

AS A PURCHASER OF HALIBUT IFQ'S IN AREA 3A, I UNDERSTAND THE CONFLICT BETWEEN COMMERCIAL & SPORT FISHERIES. AS CHARTER FISHING IS A FORM OF BUSINESS LIKE COMMERCIAL FISHING, IT SHOULD BE REQUIRED TO PURCHASE IT'S QUOTA AS COMMERCIAL FISHERMAN WHO ARE IN OR ENTERING THE FISHERY. TO RE-ALLOCATE QUOTA ANY OTHER WAY IS DISCRIMINATORY AND COMPLETELY UNFAIR. IF CHARTER BUSINESSES WANT MORE QUOTA THEY SHOULD HAVE TO PURCHASE IT. THAT IS ONLY FAIR AT THIS POINT IN THE GAME. THE SYSTEM SHOULD ALLOW ANY GROUP TO PURCHASE FROM ANY OTHER, WITH THE EXCEPTION OF PROCESSORS WHO COULD MONOPOLIZE THE FISHERY IF THEY WERE ALLOWED TO GAIN MORE QUOTA AS I BELIEVE THEY WERE ALLOCATED TO MUCH OF THE FISHERY ALREADY. THANKS FOR YOUR ATTENTION ON THIS MATTER.

RECEIVED

SEP 24 2012

Elbridge Walker

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

RECEIVED

Date: 9-20-12 SEP 24 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

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My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name:

Erin "Beaver" Nelson

Address:

Box 130 Homer AK 99603

It is patently unfair that one commercial halibut fishing group must purchase additional quota on the open market while the commercial charter fleet is allowed to usurp that quota for free via fish politics

4-20-12 RECEIVED

SEP 24 2012

My name is Ewan Nabisraath
I purchased 11,600 pounds of
3 R Halibut Quota in 2009
and now as of last year
my quota has went down
to about 6,000 pounds. I spent
down \$60,000 of my own money
and I owe the NMFS \$240,000.

I owe more money on
my halibut loan than what
I could sell them for.

They keep taking more and
more of my fish so basically
I am working for nothing
and I am underwater on
my loan now. The charter
sector doesn't need anymore of
my fish for free, I need them
so I can pay my loan.

Yours Truly

Ewan Nabisraath

EWAN NABISRAATH

F-V SWAD

149
19 SEP 2012

To: CHAIRMAN ERIC OLSON
NPFMC
605 WEST 4TH AVE, STE 306
ANCHORAGE AK 99501

RECEIVED
SEP 24 2012

From: ERIC R. WHATT
TOKEN COVE
POB 369
CRAW AK 99921

RE: ~~HARBOR~~ CATCH SHARING PLAN (CSP)

DEAR SIR:

WE (MY FAMILY) HAS BEEN STRUGGLING UNDER THE WEIGHT OF THE \$100,000 LOAN THAT WE TOOK OUT TO BUY IFQ SEVERAL YEARS BACK. AS THE CLOSEST NEIGHBOR TO THREE CHARTER LODGES IN SEA OTTER SOUND (INCLUDING EL CAPITAN LODGE), WE HAVE SEEN OUR INCOME FROM LANDING DRASTICALLY REDUCED WHILE WATCHING THE FLEETS OF THESE LODGES GROW!! I'M TOO BUSY YEAR AROUND, TRYING TO PROVIDE FOR MY YOUNG FAMILY TO HOUND REGULATORS OR AFFORD HIGH PRICED LAWYERS. - IN AN EFFORT TO SECURE MORE AND MORE "RIGHTS" TO HARBOR BIOMASS. PLEASE RESTORE SOME OF MY FAITH

IN REGULATORS BY MAINTAINING COMMERCIAL/
CHARTER ALLOCATION, AS IS. PLEASE RETAIN
2008 CSP ALLOCATIONS.

I ALSO SUPPORT QUOTA LEASE OPTIONS
FOR CHARTER OPERATIONS.

PLEASE KEEP THE PLAYING FIELD FAIR
DO NOT "CHANGE THE RULES", ABOARD,
AS WE STRUGGLE TO SURVIVE ECONOMICALLY.

SINCERELY,

Eric R. Wright

TOFFEN COVE, AK



**Boggs
Enterprises**
3900 Railway Ave
Everett, WA 98201

RECEIVED
SEP 24 2012

September 19, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,
Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



John R. Boggs
Boggs Enterprises
3900 Railway Ave
Everett, WA 98201

Subject: Fwd: Fwd: Halibut

From: Jane DiCosimo <jane.dicosimo@noaa.gov>

Date: 9/24/2012 2:45 PM

To: npfmc.comments@noaa.gov

From: Sarah Howard <sarahkhoward@gmail.com>

Date: Mon, Sep 24, 2012 at 2:56 PM

Subject: Halibut

To: pfmc.comments@noaa.gov

Dear Chairman Olson,

As a farmer, I ask you not to reallocate the halibut quota from the commercial sector to the charter industry.

The CSP allocations set in 2008 should remain the same, and should not be altered because of political pressure. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation after obstructing final regulatory action.

The CSP supplemental analysis establishes that commercial fishermen have lost money over the past six years while charter operators have MADE money. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Please do not reallocate halibut from the commercial to the charter sector.

Sincerely,

Sarah Howard

Grow Dat Youth Farm

--

Thank you for your comments to the Pacific Fishery Management Council. Your comments have been received and will be forwarded to the appropriate staff member for processing.

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220
Phone: 503-820-2280

Toll Free: 1-866-806-7204

Fax: 503-820-2299

Twitter: <http://Twitter.com/PacificCouncil>

—
Chuck Tracy
Deputy Director
Pacific Fishery Management Council
7700 NE Ambassador Place
Ste 101
Portland, OR 97220
503-820-2280

Jane.DiCosimo <Jane.DiCosimo@noaa.gov>

Greg Fisk
P.O. Box 20628
Juneau, Alaska 99802

September 24, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Eric,

Re: Halibut Catch Sharing Plan

I know that efforts to reaching a solution for sharing the halibut resource between commercial and sport charter sectors have a long, long history - and I am realistic enough to recognize that there must be political compromise. However, some of the suggested modifications now being put forward to the catch sharing plan (CSP) percentage allocations adopted in 2008 are simply not right.

On two previous occasions Council action awarded the charter fleet additional allocation that totaled 25% more than its actual harvest. Now, by further obstructing final regulatory action, the charter fleet is again seeking more unjustified increases to its allocation. Two additional re-allocation options now under consideration by the Council could reallocate another 4-5% of the combined charter/commercial catch to the charter fleet in Areas 2C and 3A. That would amount to a direct taking of roughly 1.2 million pounds from the commercial halibut fishermen. By my calculation, at current IFQ and dockside prices, that would be more than \$40,000,000 in equity value, and \$7,200,000 in annual cash flow being taken directly from commercial halibut fishermen and given to the charter fleet.

It is just totally unfair that the charter fleet be further rewarded for its years of overfishing and obstructionist tactics. I urge you and your fellow Council members to support the 2008 CSP allocations. They are based on solid historic analysis of harvest ratios between the charter and commercial longline sectors, and fairly and equitably share the resource between these two sectors. They also protect consumer access and fishery dependent Alaskan communities.

Sincerely,



Greg Fisk

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

September 24, 2012

Dear Mr. Olson,

This letter is in regards to the C-1 Halibut Catch Sharing Plan.

I have been a commercial longline fisherman since 2005. Before that I spent 26 years fishing crab in the Bering Sea. The capital I accrued from the crab fishery as a boat owner and captain, was invested into my longline operation. My initial investment into halibut IFQ alone was over \$1,000,000. Since my initial purchases of IFQ, the quotas in area 2C have decreased by 80%. In 2009, I was granted a NMFS loan of \$400,000 with which I bought IFQ in 3A. The poundage of halibut IFQ I purchased with the loan money has decreased 35%, which has put me "underwater" for that loan.

Fishing quotas go up, and they go down. That is part of the business. The amount of fish I am allowed to catch should be based on the health of the fishery and the size of the biomass...nothing else. It should not be affected by the charter boat lobby that is trying, by any means possible, to take away fish that I have paid the right to harvest. The charter industry needs to play by the same rules as the commercial industry. If they want to harvest halibut, they need to invest in the right to catch it.

The new CSP PPA (and the additional reallocation options) that are under review has the potential of taking 4-5% of the combined charter/commercial catch and gifting it solely to the charter industry. This would take money directly from commercial boats that have played by the rules, that have invested heavily in IFQs, and that, on the whole, have been losing money. Then, give that percentage to charter boats that have abused the rules, that invested only in their boats and lobbying efforts, and have been making money because they did not have to purchase or borrow money for the rights to catch halibut. If this proposal is adopted it will put many commercial operators over the edge and out of business.

Please put a stop to this welfare system for the charter industry. Enough is enough! If the charter industry wants more halibut to catch they should have to INVEST in it just like anyone else.

With that being said, I support the Catch Sharing Plan percentage allocations originally adopted in 2008. I also support the ability for charter operators to lease quota through the Guided Angler Fish provision. This is the fair solution and I ask the Council to recommit to these allocations.

Sincerely,

David Thompson, F/V Aleutian Sun
POB 2192
Petersburg, AK 99833

Subject: CSP Issues

From: Marc <dmcharters@gci.net>

Date: 9/25/2012 7:20 AM

To: npfmc.comments@noaa.gov

To Whom It May Concern: My Name is Marc Smith Co-Owner of D&M Charters out of Ninilchik. I'm opposed to The CSP as it is written. I have been in business for 20+ years. When I.F.Q. were first initiated we would have the smaller I.F.Q. holders sit 3 to 4 miles off our boats in Cook Inlet watch to see how we were doing ,if we did well they would move in and lay long lines down and clean any keepable Halibut out. Now that they have devistsated our only area that we have available for our small boats they want to make it even harder for the public to use a resource that belongs to all of us. When I.F Q.'s were started the ex vessel price was .75 per lb. now it's over 8.00 I would say they have made up for lower Quota. We are just now getting to where we don't have to subsidize our business and can make a living. Marc Smith

Mr. Eric Olson, Chair

North Pacific Fishery Management Council

605 West 4th Ave, Ste 306

Anchorage AK 99501

Dear Mr. Olson and Council,

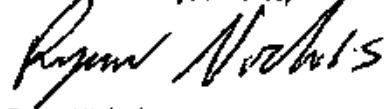
I am writing this letter in regards to the upcoming council meeting in which it has come to my attention that there is a possibility of there being continued reallocation of commercial halibut quota shares to the charter industry in both fishing areas of 2C and 3A.

I have grown up in a commercial fishing family and my family has been long lining since the early 1980s for halibut and black cod along with trolling for salmon. As I have gotten older I have been purchasing halibut quota in both of the areas 2C and 3A and have taken loans out to do so and have watched the continued decline in the halibut stocks as of late. I initially purchased at different time periods very near 10,000 pounds of quota and now only have 3500 pounds of fishable quota. While this is not what anyone likes to see I understand that there will be fluctuations in the halibut biomass and am willing to do my part in conserving this important resource. On the other hand I am very much against having the reallocation of my quota which I am still paying for and is getting more and more difficult to pay the loans at these low quotas.

The CSP allocations that were set in 2008 I feel should not be changed due to any political interference and should be left as they are the charter fleet has already been given an allocation of 25% above their actual harvest in other instances and I do not see why more should be given to the charter fleet. If one keeps reallocating the halibut resource away to other user groups than eventually there will be no commercial sector. Over the last handful of years commercial fishermen have seen the value of their halibut quota go down while the charter fleet has continued to make money at these low levels obviously the amount of fish that the charter fleet is harvesting is enough and that reallocation of more halibut to this sector is unnecessary at the direct expense of others.

I urge the NPFMC to not reallocate more halibut to the charter sector and instead to consider that what the current level of harvest is for both the commercial and charter sectors is fair and sustainable and should remain so.

Thank you for your time,



Ryan Nichols

Tall Tales Charters



(907) 235-6271 • P.O. Box 545 Anchor Point, AK 99556 • www.talltalescharters.com

September 23, 2012

Eric A. Olson, Chairman
North Pacific Fisheries Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Chairman Olson:

We are a family owned business, Tall Tales Charters, which has been in operation for more than twenty years and, as such, feel we have a vested interest in this fishery. We would like to make the following comments on the proposed Catch Sharing Plan for Guided Sport and Commercial Fisheries for Pacific Halibut.

We do not support the CSP and do not support the GAF leasing.

- The proposed CSP is relying on outdated data and lacks the necessary socio-economic study.
- The CSP also proposes a ban on halibut harvest by the skipper and crew on a charter trip. This proposal would necessitate the skipper and crew going out on a non-charter trip which is very expensive and takes away from time that should be spent on boat and gear maintenance to insure clients are on a safe, well-maintained vessel; a much more equitable solution, if crew fish is an issue, would be an annual bag limit for skipper and crew.
- Taking fish from the guided allocation and redistributing them to the commercial sector in order for the guided fishery to lease back said fish is ridiculous and does nothing towards the conservation of the resource, if resource conservation is really the goal of the council.
- A large percentage of our clientele are Alaskans and military personnel, the remainder are ordinary Americans from all parts of our country, not only is it not right to ask them to pay an extra \$150.00 to \$200.00 to catch a fish which is a public resource, but they cannot and will not pay the extra amount. Some of the very wealthy clients of the large, exclusive lodges will participate in this fishery no matter the cost, but with this proposal you are discriminating against the average working class Americans who are part of the 99%.
- Economic allocations are what both the CSP and the GAF provisions propose. By reducing the charter allocation 35% in Area 3A, we feel this is a deliberate attempt to enhance the IFQ holders' profit margin at the expense of the guided sport fishing angler which is in direct conflict with 104-297 (5) of the Magnuson-Stevens Fishery Conservation and Management Act.

We do support:

- Area 3A and 2C being regulated separately. The halibut fisheries are vastly different in fleet size, business structure, and client base and should be regulated accordingly.

Tall Tales Charters



(907) 235-6271 • P.O. Box 545 Anchor Point, AK 99556 • www.talltalescharters.com

Page 2 of 2

- Guided and unguided sport fishing anglers being treated equally. A plan that tightly regulates only the guided recreational sector will result in more private boats and "non-licensed, illegal charters" which we are already seeing on the fishing grounds; these boats are normally not USCG compliant, the skippers are not USCG licensed, the boats are not insured to carry people for hire, do not carry required safety equipment, and often times the operators do not have the skills needed to fish in the open waters of Cook Inlet; all of which puts the recreating public at a great risk. The less accessible halibut fishing becomes through legitimate guided sports fishing charters the more the public will turn to alternate means to access the fishery, people have been catching fish – single line, single fisherman – for centuries and they will find a way to continue their pursuit of recreational fishing. It is the goal of the recreational sports fishing guide to provide safe access for the sports fishing public to the fisheries while pursuing their chosen career.
- We support the following measures which we feel are steps towards true conservation: a) addressing true by-catch by all fishermen (the added 15% by catch restriction which may go into effect some day did nothing to help conservation), all commercially caught fish should be brought in, processed, and come off the allocation and sports regulations should not encourage the catch and release of fish to obtain one of a larger size; b) crucifers should be outlawed on all vessels; and c) in times of low abundance charter vessels should be limited to one limit per angler CHP per calendar day.
- If the CSP is enacted, the guided recreational fishermen allocation should be closely aligned with the GHL as we have been below our GHL and the cap on charters has taken approximately 30% from our industry.

Respectfully,

Charles E. Collins and Alice J. Collins

James Skonberg

Box 70

Ouzinkie, Ak. 99644

9-24-12

Re: Catch Sharing Plan

Eric Olsen, Chairman

North Pacific Management Council

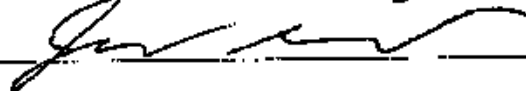
Dear Chairman Olsen, and Council members,

I was born in Ouzinkie in 1949 and have lived in Ouzinkie since 1968. I own a 48 ft. seiner which I use for salmon and halibut fishing. I started fishing halibut in 1967 and have fished every year since then. I am very concerned about the large amount of charter boats in our area. It seems like the charter fleet is getting a bigger part of the quota than they historically qualify for. I know they are entitled to quota shares, but when our quota is decreasing, how can they be allowed to increase? We do not have enough subsistence halibut in our area at the present time to feed the community of Ouzinkie. Maybe a buffer zone in some areas for subsistence fishing only.

I am sorry I could not be there in person to testify, but due to conflicting schedules it was not possible.

Sincerely,

James Skonberg



Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/24/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name: Will Kruger

Address: 3840 Railway Ave Everett, WA 98201

Deep Sea Fishermen's Union of the Pacific

5215 Ballard Avenue N.W.
Seattle, WA 98107

Phone: (206) 783-2922



Fax: (206) 783-5811

www.dsfu.org



Established 1912

9/21/2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK, 99501

RE: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

On behalf of the nearly one hundred members of the DSFU who are proudly entering their 100th year of solidarity in the fishing industry, we strongly support the CSP percentage allocations adopted in 2008 by the council. We feel that the allocations adopted in 2008 are fair and equitable. The charter fleet has been gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

The CSP supplemental analysis establishes that commercial fishermen have *lost* money over the past six years while charter operators have *made* money during these low levels of abundance. The majority of our members fish on boats which received initial allocations of halibut quota. We have seen halibut quota decline by nearly 50% since the inception of the IFQ program. With the decrease in halibut quota, not only do our members find their wages on the decline, but our members who have invested in IFQ quota are struggling to make their mortgage payments. Several of our members are upside down on their loans. Surprisingly, despite these ever increasing hardships, our members support conservation efforts put forth by the International Pacific Halibut Commission (IPHC) with the hope that conservation efforts will be shared by ALL user groups in the halibut industry.

The CSP set forth in 2008 should not be changed because of political interference. If charter operators feel they need more quota for their clients, then they should invest in more quota, after all, this is the norm in the commercial sector. Our members have never expected a quota bailout. Therefore the DSFU supports the Guided Angler provision that allows charter operators to lease quota from commercial fishermen.

In closing, we vehemently support long term conservation efforts established by the IPHC over short sighted economic gains. This creed must be adopted by all halibut user groups if we are to have any sort of future in the halibut industry.

Regards;

Shawn McManus
Vice President

Deep Sea Fishermen's Union of the Pacific (DSFU)

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 Warrea, Alternates: Scott Glosser, Joe Svymberski

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

Re: Agenda Item C1b, Halibut CSP

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.

During the time period of the Council's CSP Motion in 2008, the charter fleet was at its peak in numbers and harvest. Since then a Charter limited entry program has been established, which capped the number of participants in the charter sector, and regulations under the GHL management system have recently been keeping guided angler harvest well within their allocation. The area 3A harvest alone has been a total of 1.5 million lbs below the GHL over the past four years and area 2C has been well under its allocation the last two years.

The proposed GAF (Guided Angler Fish) program has received little support from the charter sector and seems to have many implementation, cost, and enforcement challenges. We also feel that the up to 35% reduction in the charter allocation in Area 3A is a deliberate attempt to enhance the IFQ holder's bottom line at the expense of the guided sport fishing angler. The Magnuson-Stevens Fishery Conservation and Management Act clearly states that, **104-297 (5) Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.**

Economic allocation is exactly what the CSP with the GAF provision proposes.

Some more of our concerns are:

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

- The Council adopted the 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. We are concerned about the lack of public participation in this process.
- The proposed rule for the CSP contains a ban on halibut harvest by skipper and crew. Under the CSP, the only time a charter vessel guide or crew member can harvest a halibut is on a non-charter trip. This is very expensive, fuel expenses alone would make it unreasonable for many operators. A seasonal bag limit or part time closures for skipper and crew would be more equitable

GAF (Guided Angler Fish)


- 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 could have the effect of cutting some of the larger boats out of half their available season.
- Who pays the costs of implementation and enforcement?
- GAF is not a permanent reallocation transfer mechanism. We will not know how much GAF will be available each year.
- GAF will hurt the small operators who cannot build into their marketing plan the costs for GAF. This will favor larger lodge operations that cater to wealthy clientele.
- GAF would work against the IFQ Program's "skipper on board" provision. This will encourage absentee IFQ holders in the commercial fleet.

We support the Catch Sharing Plan with the following recommendations:

- Alternative # 5 with adjustment of the allocation for area 3A to more closely align with the GHL that was deemed "fair and equitable" in federal court.
- Eliminate or defer the GAF provision until an analysis of the economic impact can be conducted.
- We prefer a permanent transfer of quota share that returns ownership to the public and not individual operators. We support a guided angler common pool plan as a permanent transfer mechanism. If leasing is allowed, there would be no incentive to sell to this guided angler pool in the future.

In summation, it is the Homer Charter Association's position that a more manageable approach can be achieved with Charter Management Implementation Committee participation and the CSP allocation adjusted to align more closely to the allocation levels of the GHL. Both of which will help preserve the resource and care for the needs of the guided angler.

Gary Ault, president Homer Charter Association.



Sept. 24, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—by orders of magnitude more "public" are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.**

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name:

Robert G. Smith Jr. FIV SPECTRE

Address:

5525 SE Seaside Ln, VANCOUVER, WA 98161

September 23, 2012
Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste. 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

It is important for all sectors to share in conservation of halibut, EQUALLY, at all abundance levels! The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was already gifted an allocation 25 % above their actual harvest on TWO occasions.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This would correct problems with the charter sector exceeding the allocation.

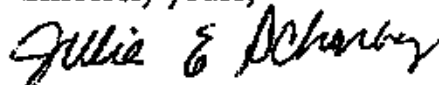
I support the Guided Angler Fish provision that allows chartered operators to lease quota if their clients want more fish. If they want more fish, they should have to invest, just as the commercial fishermen do.

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them!

Thank you for the opportunity to comment.

Sincerely yours,



Julia Schonberg

PO Box 877

Petersburg, AK 99833

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage AK 99501

Dear Mr. Olson,

23 September 2012

Re: Halibut Catch Sharing Plan (CSP)

I support the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in Oct. 2008 should be retained because they protect historic consumer access, the longline fishery, coastal communities and provide a reasonable level of access for charter operators at levels of abundance. The 2008 CPS allocations should not be changed in response to pressure from the charter fleet, which was already gifted an allocation 25% above their harvest level on two occasions.

When my family purchased quota share, it was with the expectation that NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain their harvest at or below their allocation. This is the most effective way to correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if they want to have more halibut available to them. Longliners have to invest if they want more quota; why don't the same principals apply to charter?

My family is dependant on income from the halibut longline fishery and uncompensated reallocation to the charter sector hurts both my family and my community.

The CSP supplemental analysis establishes that over the past six years with low abundance, commercial fishers have lost money while charter operators have increased their profit. Please do not exacerbate this trend by reallocating to charter at the expense of longline.

Sincerely,

Samuel W. Lewis



Box 1499 Bellingham WA 98227

From: jan storbakken
To: "%20npfmc.comments@noaa.gov" <%20npfmc.comments@noaa.gov>
Sent: Friday, September 21, 2012 11:08 AM
Subject: Halibut slamming by charters

I often hear the charter squads, bemoan they got another halibut. They also have no respect for the big momma's. The bigger the better even if they do not eat them. Commercial fisherman and their families care about the fish!!!! They know they have to preserve them. Charter fisherman just want to keep their customers happy. They care, but they are need to have happy fisherman and after someone forks out \$2,000 for a fishing trip they want a big fish. This year was a hard year on Salmon. I can honestly say I heard 4 different individuals(tourists) say I only got a halibut. With a sigh. I love halibut! Please see the responsible commercial fisherman get their quota!!!

The same goes for hunters as well. Folks were asking if anyone wanted some bear, because the hunters got their trophy.

I am a resident of Prince of Wales. I live in an economically challenged area. I gather berries, hope to get fish and crab to eat or can. Please protect our resources and let the folks that really care about their fish and environment have the reins to protect our fish!!!!

Giving that responsibility to the charters, which in turn go to the tourists, is not responsible.

Jan (Jazzy) Storbakken
Embrace the Buoy!

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/25/12 _____

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 25 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

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When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

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Thank you for the opportunity to comment.

Sincerely,

Name: Robert S. Fredrickson

Address: 617 Katlian ST. B-16, Sitka, AK 99825

Subject:

From: "Stephen Kinney" <sgkinney@kpunet.net>

Date: 9/25/2012 8:30 AM

To: <npfmc.comments@noaa.gov>

Comments regarding the halibut Commercial-Charter allocations.

I am Stephen Kinney, a long time commercial fisherman and holder of Halibut IFQ. Although my IFQ is small, it is a significant part of my fishing business plan.

Since the beginning of the allocation wars, I have seen my IFQ poundage diminish significantly... like 50-75%. The whole idea about any limited entry system is to allow current users to continue with their operations and allow new users to buy in at some market value. I strongly urge you to maintain the current commercial-charter allocation and allow new users the option of buying in like everyone else. Thank you for your service to this fishery.

Stephen Kinney, F/V Harmony
12767 N. Tongass Hwy
Ketchikan, AK 99901

(907)-247-2356
sgkinney@kpunet.net

Grace and Steve Kinney <sgkinney@kpunet.net>

Subject: Catch Sharing plan
From: James Moody <info@southeastportfishing.com>
Date: 9/25/2012 9:27 AM
To: npfmc.comments@noaa.gov

Eric Olson, Chairman
North Pacific Fishery Management Council

I am the owner of First City Charters in Ketchikan Alaska. We have been on a one fish size limit for two years now. We need to rebuild the halibut stocks. I don't have problem with that, but I do have problem with the commercial sector trying to reallocate halibut from the charter sector. We have been hit just as hard in 2C as the commercial fleet. All we are asking is to mirror the GHL. We are not looking for more fish just don't give our fish away.

Respectfully, Jim Moody

First City Charters

To: The North Pacific Fishery Management Council

From: Lisa Bartels Ambielli

Re: Proposed Reallocation of Commercial Halibut quota to the Charter Fisheries

Date: 9/25/12

RECEIVED
SEP 25 2012

My name is Lisa Bartels Ambielli. I grew up in the small fishing village of Edna Bay Alaska where I lived from 1981 until I graduated from high school in 1989. During these years I contributed to my family's annual income by deck handing on my father's commercial fishing boat both during the salmon season and the halibut seasons.

The halibut fisheries were extremely difficult in those days before the current quota system was adopted. Depending on the year, we would fish anywhere from 24 hours to 120 hours straight through with very limited sleep. We would fish no matter the weather because our family's livelihood depended on us catching as much as possible in the limited time frame.

I was initially so happy when the State of Alaska adopted the Halibut quota system allocating poundage based on past years catch because I knew first hand how much safer the fishermen would be by not being forced to fish in terrible weather.

Unfortunately, my family's halibut quota has been reduced so many times over the past few years, I am starting to second guess whether this quota system was really the best thing for all of Alaska's commercial halibut fishermen.

Not only are my parent's retirements being affected, but my inheritance, and my children's legacy are also being impacted. My family, along with hundreds of other Alaskan halibut fishermen, put their lives on the line every year during the 1970's, 80's and early 90's. We earned our halibut quota with our own sweat, blood and tears. It was allocated to us based on our actual catch year after year. It doesn't seem right to take it away and give it to someone who wasn't even around when the quota system was adopted.

Please consider the people who have made Alaska their home for decades when you make this decision. Thank you for your time.

RECEIVED

SEP 25 2012

September 25, 2012

Richard Johnson
1414 SE Oak Street
Portland, OR 97214

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

As a fisherman and investor in IFQ I resent the fact that the NPFMC is considering reallocation of fish that I have purchased to the charter section. If the charter section believes they want more fish they should purchase it like I did.

The NPFMC should stay with the 2008 agreed upon allocations. At some point the charter fleet needs to be told that this is their allocation. By doing this it enables all stakeholders to make future business plans by not having this issue over our heads. We have an allocation set in 2008 let us use it.

Having fished many fisheries over my 38 years I have seen both sides of these issues. I didn't get any pollock or crab in the Bering Sea even though I was on the first wave of joint venture fisherman. This is the way these things go. Stability is what we need and you can't please everyone. This issue has gone on long enough.

Sincerely,

Richard Johnson
Fisherman

Subject: Bycatch

From: James Moody <info@southeastportfishing.com>

Date: 9/25/2012 10:36 AM

To: npfmc.comments@noaa.gov

Eric Olson, Chairman
North Pacific Fishery Management Council
Item C3

I am owner and operator of First City Charters in Ketchikan Alaska. With the crash in king salmon and halibut stocks threw out Alaska. I think that we need to know just what we are taking out of our oceans and not just guessing. Its a big ocean and know one see what goes on out there. I would like to see observer coverage for fisheries with bycatch concerns, particularly Gulf of Alaska trawl fisheries that catch Chinook salmon, halibut and Tanner crab as bycatch. These fisheries should have increased coverage from the old program. I would also like to see electronic monitoring as a viable at-sea monitoring alternative to human observers.

Respectfully,
Jim Moody

First City Charters
Ketchikan Alaska

Deep Creek Charterboat Association
PO Box 39388
Ninilchik AK 99639

22 Sep 12

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

Re: Agenda Item C1b, Halibut CSP

Dear Chairman Olson,

The Deep Creek Charter Association is a local organization representing over 30 charter and associated businesses in Ninilchik on the Kenai Peninsula. Our members largely charter fish for halibut in Cook Inlet as our sole species of catch. We are dependent on this fishery as our sole livelihood more than any other Alaska port.

We thank the North Council for its April motion on the halibut catch sharing plan (CSP). The discussions promised hope that a number of problems that were identified with the original proposed rule could be corrected. With this letter, we want to emphasize some deficiencies in the halibut CSP we feel need to be addressed in your October meeting.

Guided recreational allocation alternatives:

We are concerned the effort to replace the GHL allocation with the alternatives presently under consideration will leave the sport sector with illogical "jinks" or "flatlines" in the allocation curve. We fully support the calculation formulas proposed by the Alaska Charter Association (ACA) which gives a smooth and appropriate increase in allocation with abundance.

By design, the suggested allocation alternatives mathematically split the GHL stair steps in both areas. These allocation alternatives are well within the logbook adjusted range of alternatives originally chosen for analysis. We join the ACA in asking the Council to adopt the following suggested alternatives:

Area 2C Suggested Alternative (including 5.6% logbook adjustment)

Combined Catch Limits (CCL) < 3.315 m pounds: 25.1% of CCL
3.315 m pounds >= CCL < 7.77 m pounds: 326.8k pounds + 15.24% of CCL
CCL >= 7.77 m pounds: 690.9k pounds + 10.56% of CCL

Area 3A Suggested Alternative (includes 11.6% logbook adjustment)

Combined Catch Limits (CCL) < 7.56 m pounds: 29.6% of CCL

7.56 m pounds >= CCL < 18.22 m pounds: 941k pounds + 17.19% of CCL

CCL >= 18.22 m pounds: 2.24 m pounds + 10.04% of CCL

Mortality study is overdue:

Unintended allocation shifts can occur if the estimated wastage for either sector is inaccurate. The last study to determine halibut survival rates we know about was done a very long time ago, and used tackle that has largely been abandoned by both sectors. Sector accountability is becoming an integral part of these discussions, and we support that concept- IF accurate information is available and all the sectors fall under the equal scrutiny.

Details of the “2012 Approach” need to be finalized:

We fully support the concept of a committee approach to regulating our fishery, as outlined in what has become known as the “2012 Approach”. However, as the concept becomes a reality, we want to emphasize the need for some recreational fisherman/ public input to the process. This could be accomplished through a meeting process with allowed public testimony, a public comment period, or public participation in the committee membership.

Guided Angler Fish (GAF) concept should be abandoned:

This concept is so ill-conceived, complicated, and distasteful that it is finally time to cut the losses short and waste no more time, money, and effort on trying to make it work. The ACA has done a thorough job in listing the pitfalls of the program, and we agree with each of the listed shortcomings. We urge you to cease efforts to make GAF workable.

Thank you

Deep Creek Charterboat Association

John G Baker, Board of Directors

September 21, 2012

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

RECEIVED

SEP 25 2012

RE: Halibut Catch Sharing Plan

Dear Chairman Olson:

My name is Jay Haun and I am a member of the small boat commercial long line fleet that depends on the health of the halibut resource for a living. I am currently the Board Chairman of Seafood Producers Cooperative, which has 500 small boat owner/members coast wide of which 350 depend on Alaska fisheries for a living. Many of our owner/members have purchased IFQ because of the stability the program offered. The IFQ program has been severely undermined by the unbridled growth of the commercial charter fleet.

When the IFQ system started, I had been long lining for several seasons but failed to qualify for the initial issue IFQ. In order to continue long lining, I was forced to purchase IFQ. I purchased a small block. When it was paid for, I used it for collateral to purchase another block. Repeating this process, I finally regained what I had lost when the IFQ program started. Even though my IFQ pounds now are roughly one-third of my original purchased pounds, I am one of the fortunate ones to have paid for them prior to the recent cuts in the quota for conservation reasons and cuts due to reallocation of the halibut resource to the commercial charter fleet. Many of the SPC owner/members have purchased IFQ and now have so little pounds they cannot make their IFQ loan payments without using income from another fishery.

The fixed costs to SPC owner/members for owning a processing plant in Sitka are applied to each pound SPC processes. When processing pounds are lost, the cost per pound increases. The fixed cost increase becomes a direct loss in returns to the owner/members on salmon, cod, and halibut. If more pounds are reallocated to the commercial charter fleet, the owner/members of SPC will lose the value of their IFQ, the income from their IFQ, and because of the loss in processing pounds, they will see decreased returns on all products that they deliver to their co-op.

I support the 2008 Catch Share Plan. The small boat long line fleet cannot withstand another reallocation of the halibut resource to the commercial charter fleet. Every time there has been an agreement on a CSP and before it is enacted, the charter fleet has complained their quota is too small, resulting in an increase in their quota. They will never accept their share of the responsibility for managing the resource if every time they complain, they are allocated more. No matter where the line is drawn, somebody will think it isn't fair. I felt that way when I was excluded from the initial issue of IFQ. But, to make long liners buy the right to harvest the halibut resource and then give that resource to the commercial charter fleet without compensating the long liner is wrong.

Enact the 2008 CSP and make the commercial charter fleet share the burden of protecting the resource we all depend on.

Sincerely,

Jay Haun

Jay M. Haun, Board Chairman
Seafood Producers Cooperative

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: Sept 6, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 25 2012

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Sigurd R. Mathisen

Name:

Sigurd R. Mathisen

Address:

Box 1460 Petersburg, AK 99833

P.S. My son and I have an awful lot on the line here. It is our livelihood, and not sport. Please hold the line, and we can build this resource, and fisheries, back to high sustainable levels. Sig

September 25, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 25 2012

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I am writing this letter in regards to potential changes in the 2008 CSP Halibut allocation that was previously agreed upon.

I have fished commercially for halibut for forty years and I have seen the lows and highs of the halibut stocks.

When the IPHC has recommended lower quotas based on sound science, I have recognized the need to accept this. However, in the last 10 years, we have taken substantial cuts from our IFQ's not entirely based on conservation but mainly due to reallocation to the Charter fishing industry. IFQ holders have by far borne the burden of conservation in addition to reallocation to the Charter fleet and can ill afford any further reallocations.

Fish prices have not increased proportionally to offset the loss of quota share through quota cuts and **our revenues have declined significantly**. I urge you not to impose any more reallocations from the Commercial sector to the Charter sector and to leave the CSP at 2008 levels.

In closing, I would like to point out that the Commercial sector is not the end user for the halibut that are harvested in the commercial fishery, but that it is the American public through purchases in grocery stores, restaurants, etc. that are the end user. **By continually reallocating the halibut resource to the Charter fleet, the greater American public is being denied access to the resource because less and less of this resource is available for purchase.**

Thank you for the opportunity to comment.

Sincerely,

Richard M. Daugherty
F/V Phoenix
18096 Pt. Stephens Rd.
PO Box 34864
Juneau, AK 99803

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 25 2012

Re: Agenda Item C1b, Halibut CSP

September 25, 2012

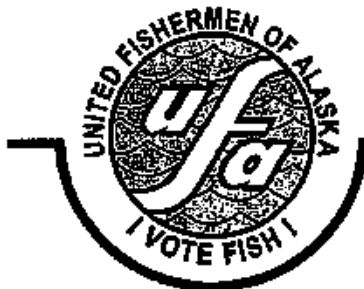
Dear Chairman Olson,

Final action on the CSP should not be taken at the October, 2012 council meeting.
There are still some concerns to make the CSP a viable option for the Halibut Sector.

1. The most generous allocation for the guided recreational sector (Option 5) falls well below the GHIL for 3A. The allocation should be adjusted to align with the GHIL. If the allocation is to be truly a floating allocation, the "jinks" need to be removed.
2. GAF is an atrocity that will guide the guided recreational fishery to a fishery where the rich "take all." Because of the extremely high overhead for charters, the prices for an all day fishing charter in 3A is high. The majority of operators will be driven out of business if they try to tack on the cost of GAF to their already high prices. Why should the fishing public be forced every year to "buy" fish which are a "public" resource. The CATCH plan will be able to buy halibut quota shares at the going market rate, so commercial will benefit financially. The CATCH plan should be encouraged and the concept GAF should be hidden in the basement!
3. Skipper fish- Both 3A and 2C were within their GHIL last year so there is no reason to eliminate skipper fish. If it is felt that skippers need to be limited in their catch, I would encourage a yearly limit on skipper and crew fish or a reduced bag limit per day for skippers and crew.

I appreciate, in advance, your willingness to tweak the CSP so it will be a workable plan.

Sincerely,
Donna Bondioli
Homer, Alaska



UNITED FISHERMEN OF ALASKA

Mailing Address: PO Box 20229, Juneau AK 99802-0229
Physical Address: 410 Calhoun Ave Ste 101, Juneau AK 99801
Phone: (907)586-2820 Fax: (907) 463-2545
Email: ufa@ufa-fish.org Website: www.ufa-fish.org

September 25, 2012

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

RECEIVED
SEP 25 2012

Dear Chairman Olson and Council Members,

RE: Comments on C1(b) Halibut Catch Sharing Plan (CSP)

UFA supports the comments and positions of our member groups in maintaining the CSP allocations set by the Council in October 2008. UFA also supports replacing the allocation range and CSP management matrix with an annual recommendation to the IPHC of charter management measure for the upcoming season. In short, UFA supports a blending of Alternatives 2 and 3.

This allocation ties the charter and commercial sector to the same index of abundance and requires both sectors to share equally in conserving the resource. UFA also supports the GAF provisions. By providing a mechanism for transfer between sectors, the GAF program directly addresses the Council's problem statement for this long-standing resource and allocation issue. GAF provisions are completely voluntary, and provide charter operators who choose to lease quota an opportunity to offset the impacts of strict management measures during times of low abundance.

United Fishermen of Alaska is the largest statewide commercial fishing trade association, representing 37 commercial fishing organizations participating in fisheries throughout the State and its offshore federal waters

Thank you for your consideration,

Mark Vinsel
Executive Director



Alaska Longline FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

September 25, 2012

Chairman Eric Olson
605 West 4th Street Ste 306
Anchorage, AK 99510

RECEIVED
SEP 25 2012

Dear Chairman Olson,

The Alaska Longline Fishermen's Association (ALFA) has worked alongside the Council for close to 20 years to finalize a management plan for the charter halibut fishery. Throughout this time our primary goal has been to end the reallocation of halibut from those who have historically depended on the halibut resource to the charter sector. With adoption of the Halibut Catch Sharing Plan (CSP) in 2008 our members thought the battle was over. Fishermen who had waited years to invest in halibut shares moved ahead with purchases and those who had begun to seriously doubt the management process regained some confidence in the future. All that confidence disappeared when NOAA once again sent the charter management plan back to the Council.

As you revisit the Halibut CSP again this October, four years after your final action on the CSP, we ask what we have asked since 1993: please stop the reallocation. ALFA supports streamlining the CSP as is proposed in Alternative 3; we support the GAF provisions included in options 2-5; we support the allocations established in 2008 and included in Alternative 2.

The 2008 CSP

Each time the Council has revisited the charter management plan, historic users have given up more to accommodate the charter fleet, and the 2008 CSP was no exception. Under the CSP, the charter industry is again guaranteed a continuous season of historic length with no in-season change in management measures. The charter allocations are increased during times of low abundance in yet one more reallocation compromise. The CSP fairly ties both charter and commercial allocations to the same index of abundance and sets these allocations after deductions for sport, subsistence and bycatch. The CSP establishes a mechanism for limited transfer between sectors, which directly addresses the Council's problem statement and allows charter operators to invest in harvesting opportunities as commercial fishermen must to increase harvest. These aspects of the CSP should not be changed; nor should the 2008 allocations.

CSP vs. the "Status Quo"

The analysis before the Council frames the allocation issue relative to the GHL. What is lost in the analysis is the reallocation that has occurred under the GHL as halibut abundance dropped in Areas 2C and 3A. When the GHLs were set, the charter percentage of the combined commercial/charter catch limit (CCL) was 13% in Area 2C and 14% in Area 3A. In 2012, the charter allocation has increased to 26% of the CCL in 2C and 20% in 3A. Phrased another way, while halibut abundance in the two areas dropped by over 50%, the commercial catch limit in 2C was cut 75% and the charter catch limit by 35%. In 3A, the commercial catch limit has been reduced by 56% and the charter catch limit by 15%. These disproportionate reductions strongly indicate that any reallocation should return halibut quota to the commercial fleet. Clearly commercial fishermen have borne the burden of conservation over the past six years—why would the Council consider imposing additional costs through further reallocation?

Reallocation: Alternatives 3-5

The economic analysis also makes a strong case against the reallocation included in Alternative 3-5. Tables 2-64 through 2-67 (pp 225-227) establish that in every scenario and in both areas annual charter halibut revenue INCREASED between 2005 and 2010, despite the decline in halibut abundance and the Area 2C adjustments to charter bag limits. Charter operators have raised prices charged to clients and, since 2007, participated in designing the management measures implemented in their sector. Despite claims of pending bankruptcy, the average charter operator has thrived over the past six years. Of equal relevance, changes in charter activity have been comparable between Areas 2C (where the bag limit was reduced and a minimum size limit imposed) and 3A (where management measure have remained static), suggesting the economic downturn, rather than harvest controls, has decreased demand for charter services.

Commercial fishermen, on the other hand, have paid a steep price for resource conservation over the past six years. Table 2-68 (page 229) illustrates that an Area 2C commercial fishermen who held 3,500 pounds of quota share (QS) in 2003 had less than 1000 lbs in 2011, which is decline of more than two thirds. Although the table indicates that the value of the QS has increased slightly, the ex-vessel revenue has declined by more than one third. In other words, even though ex-vessel prices have increased, the increase has not been enough to off-set the quota decline and revenue loss to commercial QS holders. Table 2-69 (page 230) establishes that the average vessel harvest has declined, but not by as much as the reductions in the Fishery Constant Exploitation Yield, which indicates that QS holders are fishing together on fewer boats. This consolidation of QS onto fewer boats eliminates crew jobs and has substantial community impacts.

Table 2-70 (page 231) establishes the impact on fishermen who purchased QS periodically over the years in an effort to maintain stable fishing businesses. These fishermen are now so far underwater on loans that they cannot sell the QS to pay off the QS debt. The commercial fleet is struggling, and since 75-80 percent of the QS holders are Alaskans with most living in Alaska's fishery dependent communities, the communities are also struggling.

Although the scenarios for fishermen in Area 3A still indicate revenue increases through 2011, the 3A commercial catch limit was reduced an additional 17% in 2012 and 3A fishermen testified in April to lost revenue and now being underwater on their 3A QS loans. As the analysis states on page B-2: "The increase in ex-vessel prices, which result from a decline in Area 2C and 3A halibut on the market, is not expected to be sufficient to offset the loss in revenue associated with selling fewer pounds."

In short, the analysis before the Council establishes that at low abundance levels every pound counts to the commercial industry—both harvesters and processors—and that the commercial industry has suffered severe economic impact from reduced quotas. Charter operators, on the other hand, have offset the impacts through price adjustments or management strategies that minimize impacts to their sector. Given this analysis, alternatives that increase the economic disparity by allocating more commercial quota to the charter industry are unsupported. Again, ALFA does not support the reallocations included in Alternatives 3-5.

Specific to the logbook reallocation included in Alternative 3: ALFA supports improving the timeliness and accuracy of charter catch accounting and agree that a verified logbook program is an improvement over the current management strategy. That said, we cannot support a reallocation disguised as a statistical "adjustment factor." The logbooks did not exist during the GHL base years, nor are they a verified source of information. ADFG has staunchly defended the accuracy of charter catch accounting for 20 years even as the logbooks have deviated substantially from the Statewide Harvest Survey (SWHS). Reallocating halibut to the charter fleet because the ADFG has decided the unverified logbooks are likely more accurate than the SWHS seems political rather than scientific and should be judged by that standard.

Economic impact

Over the years, charter spokespeople have claimed supreme economic importance for their industry, and have asserted that the value of charter harvested halibut eclipses the value of commercially caught halibut. We have grown weary of these unsubstantiated claims. The economic benefit of the commercial fishing sector within Alaska far outweighs the total economic benefit of the charter industry regardless of whether one considers total economic benefits or halibut specific benefits. The total annual sport fish industry economic output in Alaska is \$1.6 billion. The comparable number for the commercial fishing sector is \$5.8 billion. The tourism related jobs in Alaska from all tourist industries total 36,200. The comparable number for commercial fishing alone is 80,800. With respect to halibut specifically, under the most optimistic scenario, only \$200 million of the total \$1.6 billion of alleged sport fish economic output can be attributed to halibut in Areas 2C and 3A. For the commercial fishery, the comparable number for Areas 2C and 3A is \$478 million.¹ And, as the 2012 halibut Prohibited Species Catch EA/RIR established (p. 178) the per pound value of halibut to the charter client is comparable to the halibut per pound ex-vessel price paid to commercial fishermen.

¹ Economic Impacts and Contributions of Sport fishing in Alaska 2007 (Southwick Associates and Alaska Dept of Fish and Game Sport fish Division), The Seafood Industry in Alaska's Economy 2007 (Northern Economics).

Finally, on the issue of public access, ALFA asks that the Council remember that even at these low levels of abundance, the Area 2C and 3A commercial catch limits equate to roughly 8 million "finished" pounds of halibut, or 32 million halibut meals per year. One can assume that the average person does not eat halibut more than three times in a year, which translates to the commercial fishermen in these two areas annually providing access to the halibut resource for 7-9 million Americans plus another 1-2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. (CSP Proposed Rule EA/RIR/IRFA at xxxvii). In sum, the commercial fishery provides 44 times more Americans access to the halibut resource.

Streamlining the CSP

When the CSP was developed, the Council worked with the assumption that annual changes to charter management measures were not possible, but that establishing a prescriptive management matrix would expedite these changes. As a result, the matrix was developed and incorporated into the CSP. In 2012 the Council recommended a management change for implementation by the IPHC in the following season. This process is an improvement over the matrix and allocation ranges and should replace those in the CSP. Because charter operators have a history of objecting to a change in management measures implemented months in advance of the season, ALFA asks that the Council speak directly to this issue on the record and query charter operators on their willingness to support changes when those changes are more, rather than less restrictive.

GAF Program

The problem statement that guided the Council in developing the CSP identifies the instability caused by the lack of an effective charter allocation and identifies the need for a mechanism for transfer between sectors: "Unless a mechanism for transfer between sectors is established, the existing environment of instability and conflict will continue." (EA at xvi). Dr. Lubchenco has identified the same problem with sector allocations in other fisheries and called for market-based solutions:

"I would like to see Councils phasing in mechanisms for inter-sector trading...I think trading can be a win-win, and can allow a more fluid (and less political) allocation process.

Dr. Jane Lubchenco, April 6, 2010 Recreational Saltwater Fishing Summit, http://www.nmfs.noaa.gov/sfa/PartnershipsCommunications/recfish/RecFishSummit/RecFishSummit_041610_LubchencoRemarks.pdf.

The CSP allows charter operators to lease QS from commercial fishermen. ALFA supports this provision. The transfer mechanism will afford charter operators the opportunity to invest in resource access and conservation the same way commercial fishermen invest to participate in the halibut fishery. If charter clients want to harvest a second halibut when a one halibut bag limit is in place, charter operators can acquire the quota to provide that opportunity. The charter industry has frequently claimed that their clients place a high value on catching two halibut; if this claim is accurate, then those same clients are

likely to pay extra for the opportunity to harvest an extra fish. If the demand is not high, than the obvious conclusion is that charter clients place a lower value on that second fish than the consumers who purchase commercially harvested halibut.

Some charter operators have stated the Guided Angler Fish (GAF) provision will require them to pay for fish they never harvest, therefore will be unworkable. This fear is unfounded. Commercial fishermen are allowed to "carry over" to the following season up to 10% of their annual allocation. This 10% can be contractually held in reserve for a charter operator to use as needed over the course of the season, with the understanding that any unused portion will be returned to the QS holder at the end of the charter season and any used portion will be paid for at an agreed upon rate. Current "hired skipper" and leasing arrangements in the commercial halibut fishery suggest the likely lease rate will be approximately 50% of the ex-vessel per pound value of the QS transferred. Since the average size halibut in the charter fishery is 20 pounds and the current average ex-vessel price \$4.50, a charter operator could expect to pay approximately \$45 per GAF. Again, if charter clients place sufficient value on harvesting the second halibut, that cost will be passed on from charter operator to willing client.

Summary

Twenty years is a long time to wait for resolution of this issue and an end to halibut reallocation. As the analysis substantiates, over the past six years the commercial halibut industry has borne the burden of conservation and paid a heavy price. While we support streamlining the CSP and providing the charter industry opportunity under the GAF program, we do not support any additional reallocation. We have compromised enough. ALFA respectfully requests that the Council adopt a blend of Alternatives 2 and 3, retaining the allocations established in the 2008 but streamlining the CSP as specified in Alternative 3.

Thank you for your time and consideration.

Sincerely,



Linda Behnken
(Executive Director, ALFA)

RECEIVED

SEP 25 2012

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

September 25, 2012

Dear Mr. Olson,

I am a small boat commercial fisherman in Area 2-C who was awarded halibut IFQs, and later, bought more. Like others, I was forced into the halibut catch share system (or abandon an important part of my livelihood) in good faith that the halibut fishery would be responsibly managed. It is notable that there were no significant conservation issues up to the point of implementing quota shares but several years hence, we have serious conservation concerns.

Having had no previous personal experience of the effects of privatization of common property resources, I was willing to see how things would turn out before passing personal judgment. However, back then, I objected to the fact that a major sector of our economies within remote coastal communities -- professional crew members with a demonstrated financial dependence on the resource -- were summarily excluded from eligibility for quota share allotment at the outset. I also objected to a system which locked in place the maldistribution of a shared public wealth by mandating millionaires and multi-millionaires of the relatively few -- at great expense and exclusion of the many. This pattern of exclusion and concentration of ownership of a once-common property resource into fewer and fewer hands mirrors national and international trends in the corporatization of common property natural resources.

This first impression of a "necessary" sacrificial injustice of exclusion of the many for the exploitation by the few, caused me great concern 17 years ago. The imposition of the Quota Share System would ultimately prove to be not necessary at all, for I now know many regulatory options to the catch share system exist. Further, I have found the same rationale which forced out crew members from the start is applying pressure upon or forcing out altogether, the smaller fishermen like myself, who qualified for quota at the outset.

This has become my major wake-up call to the defining element of monetization and privatization of a public resource: it results in a concentration of common property wealth into fewer and fewer hands, to the greatest benefit of the financial sectors -- and to the exclusion of those who most depend upon the resource for economic survival.

The claim was and continues to be made, by restricting access, IFQs would thereby result in a stable, well managed resource. That good faith was breached when regulators of the IFQ program stood by as the commercial charter fleet was allowed for several years, unlimited access to the same halibut that the commercial fishing fleet was required to buy at a premium price and by incurring great risk in uncertain financial times by the burden of financing debt.

I entered the catch share system in good faith that political interference would not further undermine my ability to make a living by allowing the charter fleet to repeatedly exceed its annual allowance in the overall quota. History shows that good faith was also breached. By this regulatory failure, the commercial fishing fleet was forced to bear the burden of mismanagement under the mandate of "conservation" while the commercial charter fleet was allowed to routinely exceed its allowance -- year, after year. After all, the charter fleet has already been allocated that which was above their actual harvest on two separate occasions.

The well-documented cause-effect relationship of mismanagement and regulatory failure resulted in severe financial losses for the small boat commercial fishing fleet and imposed "externalized" socio-economic costs to Area 2-C rural coastal communities. Again, it is important to recognize the mechanism by which the quota share system operates is one which concentrates wealth in fewer and fewer hands. Those hands being the ones who don't really need *more* in order to survive. The maldistribution of wealth is a central feature of the demise of the American middle class and threatens the very foundation of our constitutional republic.

The price of halibut IFQ has skyrocketed beyond many rural resident fisherman's ability to buy more without going deeply into debt in very uncertain financial times. The quota share market price history is one of a constantly inflating bubble. This is a predictable outcome borne of a limited supply (of halibut) in combination with a virtually unlimited demand skewed in favor of those who can afford to buy quota share without going into debt. The quota share system is a driver of fleet overcapitalization, and is driving the inflation of (and ultimate bursting of), a classic bubble.

Despite regulators' promises of maintaining the existing fleet structure and ownership, to the contrary, there has been a well-documented out-migration of IFQ ownership from our small, rural, isolated, and economically vulnerable coastal communities which had a high dependence on the resource. The transfer of wealth from the public's ownership of a common property resource to the wealth of private finance capitalists living in urban areas far from Area 2-C is the most profound consequence of this privatization.

So it is with great consternation, that I am forced to advocate within the constraints of a deeply flawed quota share system which has a demonstrated failure to adequately manage and protect, and most importantly, a system which has a propensity for political manipulation. That manipulation is self-evident in this current attempt to reallocate yet more quota share to the charter fleet.

I am in support of the same leasing options and or purchasing options for the charter fleet as those which the commercial fishermen have. I am in support of the original percentage allocations which were adopted by the NPFMC in 2008 and ask that the Council find the courage to not become a functionary to further political manipulation by further increasing the allocation to the charter fleet.

Sincerely,

David Beebe

FV JerryO

POB 148 Petersburg, AK 99833

Fw: Halibut reallocation please read and respond back to show tha...

Subject: Fw: Halibut reallocation please read and respond back to show that you have read this

From: charles skultka <gosurfn@yahoo.com>

Date: 9/25/2012 12:06 PM

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

Mr. Olson

This message was sent back for some reason and i'm attempting to get it to you i hope it goes through this time. if not ill re-write it and try again.

Thank you,

Charlie Skultka Jr.

Sitka Alaskan

RECEIVED
SEP 25 2012

----- Forwarded Message -----

From: charles skultka <gosurfn@yahoo.com>

To: "%20npfmc.comments@noaa.gov" <%20npfmc.comments@noaa.gov>

Sent: Tuesday, September 25, 2012 11:03 AM

Subject: Halibut reallocation please read and respond back to show that you have read this

Mr Olson,

I have sat silent for quite sometime hoping that someone in your organization,(or yourself even) would put an end to this madness.

Well I now feel that the time has come for me to voice my opinion on your plans to create yet another monopoly in our great state.

This entire situation has spun completely out of control do to your organization allowing money to play a part in your fish politics.

There is no grey area, except for the one you and your council are trying to create. Strict rules were put in place to protect our resources,

and it seems that every time there is an opportunity to get rich people like you and the ones sitting on your counsels and boards will stop

at nothing to take advantage of the situation's you've created.

As I mentioned earlier there is no "grey area" the rules are very clear and should remain so.

1. If you catch a fish play and release it, this is called "SPORT FISHING" period.
2. If you catch a fish and bring it home to eat, this is called " SUBSISTENCE FISHING".
3. If you catch a fish and bring it into port and sell it, this is called "COMMERCIAL FISHING".

There is no 4th user group except for the one your trying to create to protect a special interest group under the guise of Charter Fishing.

I feel that the thought that charter boat clients are "ENTITLED" to keep fish because they have a "SPORT FISHING LICENSE" is ludacris,

and only shows that you are letting money get in the way of sound management practices. The only thing they are "ENTITLED" to is catching and releasing fish.

I have voiced this opinion many times at meetings and it has fallen on deaf ears, last time i brought this up many charter captains were

opposed to my way of thinking because, (in their own words) if this were true then i would loose well over half of my clientele. Well this says allot about the charter fishermen's clientele, it says to me that over half of their clientele are not sport fishermen at all.

I think Chief Seattle hit the nail on the head when he stated, " Only till the last tree has fell, and the last of the fish and game have been slaughtered, only then will the white man realize that, YOU CAN'T EAT MONEY.

If you don't agree with any of this then, I ask that you simply go to Washington, Oregon, or California buy an out of state sport fishing license and then try to catch and keep a steelhead or a salmon or a halibut. I would really like to discuss this further and do hope that this is read in it's entirety at the meeting for all to hear. In this life we all make choices, and we live with them for the rest of our lives. I certainly hope that you will make the right choices here and put an end to big money trying to buy fishing rights, that don't exist.

Thank you for your time,

Charlie Skultka Jr.

Commercial, subsistence, and sport fisherman

Sitka Alaska

Seward Charterboat Association
8340 East 11th ct
Anchorage, Alaska 99505

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SEP 25 2012

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

Re: Agenda Item C1b, Halibut CSP

September 25, 2012

Dear Chairman Olsen and Council Members,

Our organization was founded in 1996 and represents 25 charter-fishing operators, who fish the waters of the North Gulf Coast and Prince William Sound.

Our organization met in August 9, 2012 and discussed the April Catch Sharing Plan Motion and since then we have reviewed the analyses of the changes to the Halibut Catch Sharing Plan.

We unanimously voted to support the new motion using Alternative 5 as only acceptable allocation for our industry.

The Status Quo still puts the management measures imposed on our industry in the hands of managers and possibly the IPHC; none of whom are currently stakeholders in the halibut charter fishery. This has proven to be problematic in the past and will in the future if no action is taken.

Alternative 5 still reallocates over 1 million dollars worth of halibut to the longline sector immediately and in times of higher abundance even more. This is more than enough compromise and no other alternative is acceptable to our organization. 250,000 pounds of halibut is too much to lose, but we realize that in every plan there is compromise and this is as far as we should have to bend.

We are still wondering why *there was no option to even consider that results in a neutral or net positive financial effect on the charter industry?*

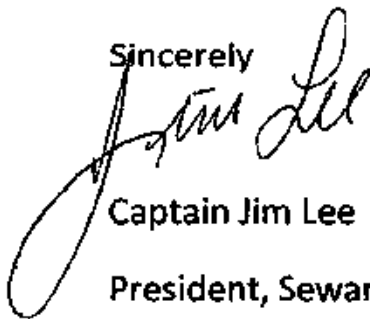
For this reason, the only option possible to consider for allocation at this time is Option 5. Any other option is a radical redistribution of halibut from the charter sector to the commercial long line sector and would result in immediate and irreparable harm to the charter sector.

Our membership questions the usefulness of GAF concept but we all agreed not to limit tools in the toolbox until we see where the resource is going in the future. Please keep this provision in the Catch Sharing Plan. There has been strong opposition to new programs like the halibut and sablefish IFQ programs that ended up helping industry, after implementation. We would suggest an annual review to make sure that the program is functioning in the way the Council intends.

Our organization is looking forward to future analysis of a common pool compensated reallocation program and would like to see language in the final action to allow for future consideration of this concept as a final long term solution for our sector.

One of our members said is best when he said that "this country has been founded on compromise". I have to add that means both sides giving a little bit, not the outright destruction one sector to the benefit of the other. Please choose option 5 for allocation, to save our industry in area 3A and to be more than fair to the long line sector.

Sincerely



Captain Jim Lee

President, Seward Charter boat Association

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED
SEP 25 2012

Re: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson:

September 23, 2012

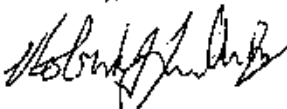
I am a long term Seward resident and commercial fisherman supporting an Alaskan fishing family. I have had a front row seat in observing both the reasons why the IFQ program was created to begin with, as well as the aftereffects; some of which were predictable. One of these would be the long struggle which continues at this meeting over how the charter sector will participate in the need for halibut conservation in the midst of a declining resource. I totally understand and support the need to conserve the halibut resource. I am willing to sit on the beach, for years if necessary, to rebuild threatened halibut stocks or any other of the fisheries resources that I participate in. When I hear charter operators testify that they support the need to conserve our halibut resource as well, I believe that deep down they do. But really, why should they now? When political efforts can be used successfully to push that responsibility onto the other guy, I guess it's not time yet even though the resource has dropped by half or more. Look at the numbers. As an Area 3A fisherman, I have seen 3A IFQ's have cut in half over the last five years as the resource has declined. While on the charter side of this business, from an Area 3A perspective, I have seen the only limitation to full speed ahead to be that of the health of the tourism economy. The latest reallocation argument by charter owners seeks to expand the charter GHL in order to maintain business as usual for a while longer as the halibut resource continues to decline.

Since I had to buy almost every quota pound I have ever fished (now transferred to my sons but still hocked to the bank), I feel that when the pounds I bought and am still paying for with hard work and sacrifice are reallocated away to the charter group repeatedly with no compensation, this amounts to fraud and theft. It's difficult to swallow is the whining unwillingness of the commercial charter group to conserve, in spite of their rhetoric. Here we are at this Council meeting, discussing the reallocation of halibut IFQ pounds from setline to charter once again. This, while it is established in the website documents that at the lowest tier resource level, the CSP as it now stands already "allocates a larger percentage of the combined CEY to the charter sector".

I support the GAF provision, or any other method of allowing the charter sector to invest in a level IFQ playing field where risk and inevitable resource variability are shared equally by both sectors.

In response to the Motion and Options on the table, I urge the Council to maintain the integrity of the RAM program for all commercial participants. I support the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

Sincerely,



Robert Linville
PO Box 1753
Seward, AK 99664

UNUSED NOTES

can essentially take away from them for free, this creates the need for the CSP in the first place. In Area 3A, we have already lost more than half of our quota pounds in the last four years but we understand the reasons why. Conservation requires sacrifice. This is a concept that the charter industry does not yet seem mature enough to accept. Pointing the finger at others and continuing business as usual while we all witness the diminishing size of the fish reflects greed and denial. If we all operated that way, the collapse of the resource entirely would become inevitable. A legacy of destroyed fisheries is all too common worldwide due to this exact type of behavior.

Please set aside all the innuendo about which type of halibut boat benefits the public/economy the most. We both do. If the halibut resource is not managed properly, the economic fallout will be devastating. If we can share the pain and control our catch, then the measures put forth in the CSP will no longer be necessary. Please support the CSP as proposed.

Thanks for the opportunity to comment.

Patty, my wife, and I raised three kids and put food on the table working together in our small halibut/salmon fishing business based out of our Seward home for the last thirty years. The kids are now grown and on their own, but all are still active in our local commercial fisheries.



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SEP 25 2012

JIM MARTIN
WEST COAST REGIONAL DIRECTOR
THE RECREATIONAL FISHING ALLIANCE
P.O. Box 2420
Fort Bragg, CA 95437
(707) 357-3422

NATIONAL OFFICE:
PO BOX 3080
NEW GRENA NJ 08224
(888) 564-6732

Tuesday, September 25, 2012

Chairman Eric Olson
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

Re: Agenda Item C-1: Halibut CSP

Dear Chairman Olson and members of the Council,

The Recreational Fishing Alliance (RFA) is a national 501(c)(4) non-profit grassroots political action organization whose mission is to safeguard the rights of salt water anglers, protect marine, boat, and tackle industry jobs, and insure the long-term sustainability of our nation's marine fisheries.

We are writing in support of the Alaska Charter Association's letter on the 2012 Halibut Catch Sharing Plan (CSP). After careful review of the council staff's 300+ page report, and the options open for discussion, we find the ACA letter complete and factual.

When comparing the options in the Council document, the material is confusing to stakeholders in that it compares the options to the 2008 CSP allocation levels, rather than to the GHL status quo allocations. The economic analysis of the impacts of the options on the charter sector is accurate, however, and these analyses clearly show the negative economic impact of these proposed regulations on the charter fishing industry in Alaska.

Some stakeholders in the commercial fishing industry have characterized these options as representing a loss of allocation to the longline industry. Nothing could be further from the truth.

We refer the council to the 4000+ public comments submitted to NMFS regarding the proposed final rule last year. The majority of the public comment opposed the 2008 CSP rules and NMFS rejected the rule and passed it back to the NPFMC for more work. Through its stakeholder advisory committee, the Council has improved some aspects of the CSP. Even so, the options are putting the Council in the same position we saw last year, when guided anglers in Alaska faced the prospect of having fish re-allocated to the commercial sector, while being given the option to "rent it back" through the GAF provisions. These comments need to be addressed:

www.regulations.gov/#!docketDetail;rpp=10;po=0;D=NOAA-NMFS-2011-0180

The GAF provisions remain as problematic as ever. Stakeholders are raising questions about enforceability, program cost and muddled sector accountability.

Despite the misinformation being distributed to the public, the ACA is not asking for more allocation vs. the status quo (GHL). The Council needs to review the economic analysis. It clearly shows the predicted losses to the charter industry associated with all the alternatives, except for the status quo allocation levels.

Furthermore, there is no statement of reasons or justification for this re-allocation. NMFS, with good reason, rejected the 2008 CSP. Why does the Council insist on going down this road again?

Sincerely,

A handwritten signature in black ink that reads "Jim Martin". The signature is written in a cursive, slightly slanted style.

Jim Martin
West Coast Regional Director
The Recreational Fishing Alliance



PO Box 22073
Juneau, AK 99802-2073
(206) 260-9111 efax

halibutcoalition@gmail.com
www.halibutcoalition.org

RECEIVED
SEP 25 2012

September 25, 2012

Mr. Eric Olson
Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Chairman Olson and Members of the Council,

Re: Halibut Catch Sharing Plan (CSP) Agenda Item C-1

The Halibut Coalition includes thirteen member groups and over 500 individual members. Coalition members live both in and outside Alaska and process or fish in halibut areas across the Gulf, Bering Sea and Aleutian Islands. On behalf of the Coalition's members and families, we are submitting these comments.

In 1993, commercial halibut fishermen asked the North Pacific Fishery Management Council to design a management plan for the charter industry that stopped the open ended reallocation of halibut from the commercial to the charter sectors. In 1997, the Council adopted the first charter Guideline Harvest Level (GHL), awarding the charter sectors in Areas 2C and 3A 125% of their 1995 harvest, which was their historic high year at the time of Council action. In 1995, charter harvest in Area 2C was 9% of the combined charter commercial limit (CCL); in Area 3A charter harvest was 12% of the combined CCL. In 2000 the Council adjusted the GHL upward, again awarding the charter fleet 125 percent of their historic high harvest years (95-99). The charter allocation translated to 13% of the combined CCL in 2C and 14% in 3A. In 2008, the Council adopted the Catch Sharing Plan, again increasing charter allocations, particularly in Area 2C in times of low abundance (17%)—which, due to reapportionment, is likely the new norm. In 2012, the GHL has allowed the charter allocation to increase to 26% of the combined CCL in Area 2C and to 20% in 3A. Clearly the reallocation has continued; the GHL has failed to provide commercial fishermen, who are making substantial investments in quota in order to fish for halibut, with any protection.

In short, through Council and Agency inaction, the charter harvest has grown from approximately 10% of the combined CCL in Areas 2C and 3A to 26% and 20%. For almost 20 years we have asked the Council to

Alaska Longline Fishermen's Association • Cordova District Fishermen • Deep Sea Fishermen's Union •
Fishing Vessel Owners Association • Halibut Association of North America • Kachemak Bay Fisheries
Association • North Pacific Fisheries Association • Petersburg Vessel Owners Association • Sea Food
Producers Cooperative • Southeast Alaska Fishermen's Alliance • United Cook Inlet Driftnetters Association
• United Fishermen's Marketing Association • United Southeast Alaska Gillnetters Association

stop the reallocation of halibut from the commercial to the charter sector but the reallocation has continued. And yet at this meeting the Council is again considering further reallocation.

To our industry, people who have wiped out their savings to purchase quota, put up their houses as collateral, and are now under water on their loans, most of the alternatives before the Council are unfathomable. None of the alternatives restrict charter harvest to the 2000 GHIs of 13% and 14% respectively of the Area 2C and 3A combined CCL. There is no one alternative that addresses the continued impact of the charter sector on commercial processors, subsistence harvesters, unguided anglers, or the public who buys halibut through the commercial harvest. For these reasons, the Halibut Coalition cannot support any alternative as currently written. **What we do support is a modified Alternative 3—modified to retain allocations from the 2008 CSP but streamlined to eliminate the allocation range and the management matrix.**

THE ALTERNATIVES

The problem statement that launched the CSP is as relevant now as it was in 1993 and 2007: *The absence of a hard allocation between the commercial longline and the charter halibut sectors has resulted in conflicts between sectors and tensions in coastal communities that are dependent on the halibut resource. Unless a mechanism for transfer between sectors is established, [the existing instability and conflict will continue. The Council seeks to address this instability while balancing the needs of all who depend on the halibut resource for food sport or livelihood.*

Because the GHI ties the charter allocation to the Constant Exploitation Yield, instead of the combined charter/commercial catch limit (CCL), it has not stopped the reallocation of halibut from commercial to charter harvesters. As described above, the GHI unfairly burdens commercial harvesters during times of low abundance. By way of example, the Area 2C commercial quota has been reduced by 75% between 2006 and 2012 while the charter allocations only decreased by 35%. For this reason, Alternative 1 is unacceptable.

The CSP adopted by the Council in 2008 set fair allocations based on historic harvest levels. The CSP fairly ties both sectors to the same index of abundance and, with the Guided Angler Fish program, establishes a mechanism for limited transfer of quota between sectors to eliminate future allocation battles. These components address the Council's problem statement and are supported by the Coalition. That said, the Coalition supports the efficiency afforded by the newly recognized authority of the IPHC to annually implement changes to charter management measures as recommended by the Council, and support substituting this approach for the management matrix and allocation range, which makes Alternative 3 an improvement over Alternative 2.

While the Coalition supports the management approach used in Alternative 3, **we cannot support the additional reallocation incorporated into Alternative 3.** The Halibut Coalition does not support the "logbook adjustment" reallocation. The "adjustment" reallocates quota as part of the switch to managing the charter fleet with logbook data instead of the State Wide Harvest Survey. The Coalition fully supports more timely and accurate catch accounting for the charter fleet, and supports a verified logbook program. It is, however, unprecedented to base a reallocation on matching one unverified self-reported data set that didn't exist during the allocation base years to a data set that managers have staunchly defended for 20 years.

The reallocation is also in direct contrast to Council policy when the GHL was set. Although few Council members may remember, after the GHL baseline years were selected, ADFG corrected faulty average size data used in one of the base years, which significantly lowered their estimate of catch for that year, but the GHL was never adjusted downward. If the logbook adjustment is made, then the CSP allocation, which was based on the GHL allocation, should likewise be adjusted. The Council might also consider the precedent being set by this action: if the new observer program indicates halibut or salmon bycatch have been underestimated, will the Council simply reallocate PSC? The Halibut Coalition would not support that reallocation, nor do we support this proposed reallocation.

Alternatives 4 and 5 allocate more halibut to the charter sector during times of low abundance. As the economic analysis section that begins on page 221 of the RIR establishes, low abundance has had far more draconian impacts on the commercial sector. Table 2-68 (page 229) illustrates that an Area 2C commercial fisherman who held 3,500 pounds of quota share (QS) in 2003 had less than 1000 lbs in 2011, which is a decline of more than two thirds. Although the table indicates that the value of the QS has increased slightly, the ex-vessel revenue has declined by more than one third. In other words, even though ex-vessel prices have increased, the increase has not been enough to off-set the quota decline and revenue loss to commercial QS holders.

Table 2-69 (page 230) establishes that the average vessel harvest has declined, but not by as much as the reductions in the Fishery Constant Exploitation Yield, which indicates that QS holders are fishing together on fewer boats. This consolidation of QS onto few boats eliminates crew jobs and has substantial community impacts.

Table 2-70 (page 231) illustrates the fate of fishermen who purchased QS periodically over the years in an attempt to maintain viable fishing businesses. These fishermen are now so far underwater that they cannot sell the QS to pay off the QS debt. In April 2012 some fishermen testified before the Advisory Panel to using the ex-vessel revenue from their halibut trip to make their loan payment, charging fuel, bait, and food on credit cards, then going cod fishing, salmon fishing or working in town to make credit card payments. The commercial fleet is struggling, and since 75-80 percent of the QS holders are Alaskans with most living in Alaska's fishery dependent communities, the communities are also struggling. Impacts documented in the analysis for Area 3A are less severe, however the trends are the same and, with the additional dramatic 3A quota reduction in 2012, approaching the same magnitude.

The commercial halibut processing sector is also directly and adversely affected by quota reductions and reallocations. "Halibut ...keeps product flowing through the plants when other fisheries are closed or deliveries are slow." (Exec summary p. xxxii) Processors rely on halibut to maintain the local and stable work force critical to the economy of fishery dependent communities.

Tables 2-64 through 2-67 (pp 225-227) tell the opposite story for the charter industry. The tables establish that in every scenario and in both areas annual charter halibut revenue INCREASED between 2005 and 2010. Charter operators have raised prices charged to clients and, since 2007, participated in designing the management measures implemented in their sector. The commercial industry cannot raise prices or switch target species (without investing in limited entry permits), nor can they design management measures that minimize damage to their businesses. The quota is reduced and commercial fishermen stop fishing when their quota is caught—no accommodations are made for continuous season of historic length,

uninterrupted seasons regardless of in-season overage, etc.; harvesting and processing stops. In sum, the analysis before the Council establishes that at low abundance levels every pound counts to the commercial industry—both harvesters and processors—and that the commercial industry has suffered severe economic impact from reduced quotas. Charter operators, on the other hand, have offset the impacts through price adjustments or management strategies that minimize impacts to their sector. Given this analysis, it is difficult to understand the rationale for alternatives that would increase the economic disparity by allocating more commercial quota to the charter industry at low levels of abundance. Alternatives 4 and 5 ARE NOT supported by the analysis before the Council.

PUBLIC ACCESS

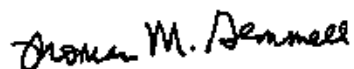
The Council needs to remember that this issue is broader than the commercial and charter industries. The Council's problem statement speaks to impacts on subsistence and sport fishermen, many of whom have testified to the Council requesting reductions in charter harvest. The Council must also consider the public that likes to eat halibut. Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more "public" are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, **the longline fishery provides 40 times more Americans access to the halibut resource** and provides national economic benefit through export. This broader public would be ill-served by any additional reallocation from the commercial to the charter sector.

SUMMARY

For almost 20 years halibut fishermen have asked the Council to stop the reallocation of halibut from commercial to charter fishermen. The commercial fleet has repeatedly compromised in an effort to resolve this issue and provide a measure of stability to the industry. At each repeat of the charter management cycle, additional quota has been reallocated from the commercial to charter sector. At the October meeting the Council will again consider reallocating quota to the charter sector, this time with an emphasis on reallocations at low levels of abundance. The analysis conducted for the Council does not support the reallocation on any terms—not social, economic nor environmental. Because halibut stocks are likely to be at low levels for most of the next decade—and possibly permanently in Area 2C—the Council's decision on low abundance allocations will dramatically affect the future of the halibut industry and the access of everyone who depends on the halibut resource for food, sport or livelihood. The Halibut Coalition does not support any reallocation above the levels set in 2008. We do support streamlining the CSP management process, implementing the GAF program and finally stopping the open ended reallocation.

Thank you for the opportunity to comment. Members of our Coalition will be on hand to testify to the Advisory Panel and the Council in October.

Sincerely,



Thomas M Gemmell
Executive Director

Copy: Governor Sean Parnell
Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young

Subject: Halibut CSP C1(b)

From: Marsh Skeele <marsh.skeele@yahoo.com>

Date: 9/25/2012 2:34 PM

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

Dear chair Olson and Council Members,

I live in Sitka, where I grew up fishing halibut with my family in Southeast Alaska. For the past ten years I have crewed on commercial Halibut longliners. I am commenting on the agenda item C1(b).

In recent years I have watched the commercial sector's halibut quota get cut back repeatedly , hoping that it is for the betterment of the halibut resource. All sectors have a hard time in years of low halibut abundance, but the commercial sector has dealt with the brunt of the economic loss. I see no reason for a political pressure to reallocate away from the harder hit commercial sector. If charter operators want to fish more halibut, there are provisions for them to lease it.

Thank You,
Marsh Skeele

Subject: COMMENTS - Halibut Catch Sharing Plan
From: Mary Ann Peterson <map3684@gmail.com>
Date: 9/25/2012 2:57 PM
To: npfmc.comments@noaa.gov

North Pacific Fishery Management Council
605 West Fourth Avenue Suite 306
Anchorage, Alaska 99501

Dear Chairman Olson and Members:

The issue of the Halibut Catch Sharing Plan before you is as much about leadership and resisting political interference as it is about fairness and managing our fisheries responsibly.

Charter boat operators have consistently over fished their allocation, by as much as 115% of the GHM in Area 2C, ever since the guideline was established by the Council. In stark contrast, commercial halibut fishermen have instituted bathymetric mapping of the ocean floor to identify high risk areas and have subsequently reduced their rockfish bycatch by over 20%.

While the commercial halibut sector is moving toward a fleet-wide Observer Program, efforts to improve accountability within the guided angler fleet have been fought by organized charter operators.

On-board research, initiated by commercial fishermen, has shown camera observer programs such as Canada's, would be both effective and cost efficient for their fleet. Conversely, the Council has yet to implement a reliable accountability program that charter operators would not resist.

The majority of commercial halibut fishermen have paid for their IFQs and many are now underwater on their loans as a result of repeated reduction in their allowable catch. To further reduce commercial fishermen's IFQ shares and give them away to another group that has neither paid for their allocations nor managed their shares responsibly is akin to

pushing a drowning man's head further underwater.

Charter boat operators have levied political pressure against the United States Department of Commerce in order to obstruct the process before you. Allied with powerful sports fishing groups in the lower forty-eight states, they have coordinated campaigns that sent thousands of letters and emails to Washington, DC and the Council. The Alaska Charter Association sued the Secretary of Commerce in an unsuccessful attempt to force higher allocations for their members.

The contrast between one group of fishermen who proactively has moved toward change and another group who only lobbies for higher shares of what they tell their members is "Our Fish" is pretty self evident. These fish belong to all of us, not just some. There will be enough fish for all, if we all act in a responsible and fully accountable way toward our resources.

I urge the Council to do what is fair and equitable for both fishing groups and our resources and not bow to political pressure. Further delay only increases uncertainty for both groups. It is time to move forward. I support Alternative #3 as a step in that direction.

Thank you for this opportunity to share my concerns.

Mary Ann Peterson,
Troller and Concerned Citizen

f/v Last Dance
Sitka, Alaska
907-752-3684



505 West 4th Ave. Ste 306
Anchorage AK 99501

Dear Mr. Olson

Re: Halibut Catch Sharing Plan (CSP)

I write this letter in support of the allocation percentages adopted by the Council in October 2008, and believe that alternative three encompasses elements of importance of the CSP. What we cannot support are mechanisms put forth for reallocating halibut to the charter sector where discard mortality has not been calculated thereby separate accountability becomes an uncompensated reallocation. Additionally, a correction factor for switching to the state logbook for monitoring charter harvest clearly gives charter companies additional fish.

These increased allocations to the charters are at the expense of the commercial sector already reeling from multiples years of shrinking quota and lost revenues.

Snug Harbor Seafoods employs 85 people per year processing halibut, shipping on average over 2.5 million pounds per year to brokers, distributors and restaurants in the US. Continued commercial quota loss impacts market share and our ability to remain viable in a highly competitive environment.

We understand that the health of the biomass is in question and catch limits are down, but it is not the time for any sector to be given an increased allocation at the expense of another.

We support a modified version of Alternative 3 that does not reallocate halibut from the commercial sector to the charter sector without compensation.

Sincerely,

Brenda Date

Vice President

Snug Harbor Seafoods, Inc.

RECEIVED
SEP 25 2012

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KIPNAY, ALASKA 99611
907.283.6122
907.283.6127 fax
snug@alaska.net

Cindy Fuglvog
Owner
F/V Kamilar
PO Box 71
Petersburg, AK 99833
cfuglvog@ymail.com

RECEIVED
SEP 25 2012

September 24, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
Via email: npfmc.comments@noaa.gov

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson and members of the Council,

My name is Cindy Fuglvog and I am the owner of the F/V Kamilar, a 66 foot vessel that I port in my hometown of Petersburg, Alaska. I was born and raised in Southeast Alaska and spent most of my summers on the deck of my family fishing boats. I now own my own vessel, and I have an outstanding loan for 3A halibut quota. A significant amount of my income and that of my crew comes from the halibut fished aboard my vessel.

I will not be speaking about any of the alternatives, a family emergency has prevented me from reading the analysis and developing a position. However I highly encourage the Council to consider the impacts to the commercial sector if quota is reallocated.

In October of 2007 when I purchased the 3A halibut IFQ's the 41,672 pounds (294,210 units) were valued at \$1,104,308. I took over the original note of \$646,898 and entered into a separate note with the IFQ holder (new lender) for \$457,809. The note to the new lender was to be paid off with proceeds left over from the income of the quota each year after the note to the original lender was paid. In other words whatever is left after paying the original lender goes to my new lender to pay down the debt. That debt has a payoff date of July 2013. The value of the quota based on 2011 numbers is now \$776,832 down from \$1,104,308. I still owe the new lender roughly \$400,000. Two years ago was especially difficult as I went backwards when the price of the halibut crashed. I owe a million dollars for the halibut today which is worth \$776,832.

I live and I work in Petersburg. I chose to raise my children here and I hire local crewmembers whenever possible. I buy my groceries at the local stores, I buy my fuel at the local fuel dock, and I support the local economy year round. I am dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP promotes conservation by providing a pre-season effective means (bag and size limits) to control charter harvest and keep the conservation targets. This will correct previous problems with the charter sector frequently exceeding their allocation under the status quo GHL. The opportunity for individual charter operators to annually lease "Guided Angler Fish" (GAF) from individual QS holders at a market based price is an important tool for guides. It allows an opportunity for a larger size fish if their clients so desire and provides an opportunity to move fish between sectors.

Thank you for the opportunity to comment.

Sincerely,
Cindy Fuglvog
Owner
F/V Kamilar

Subject: Halibut Catch Sharing Plan
From: Bonny Millard <BONNYANTARES@AOL.COM>
Date: 9/25/2012 3:23 PM
To: npfmc.comments@noaa.gov
CC: seafa@gci.net

9/25/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK . 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing plan

My name is Bonny Millard and I support the catch sharing plan. I was born and raised in Juneau and have halibut fished out of pelican, sitka, yakutat, and Juneau for 30 years or so. Fishing was my sole way of making a living. I was not issued enough IFQ's originally to keep my operation going so I invested heavily into my future by purchasing a substantial amount of quota at 11.6% interest when the system was implemented. With a decreasing quota, I purchased even more to sustain myself and crew. I do not have a problem taking these cuts in the name of conservation but cannot tolerate this constant gifting of the commercial quota to the charter sector. This is the same state that lends us money to purchase quota then turns around and gives it to another sector. Where is the validity of the IFQ program and this board process? I am asking, Is this board swayed by money and power? I am here to remind you that there is a resource to responsibly manage here. This state boasts sustainability and the way the charter sector is so loosely managed promotes an unsustainable situation. A sustainable harvest is the amount you can remove each year and keep the population at the same level. I serve on a few boards in this state because I am passionate about keeping our fisheries sustainable and you cannot do this without accurate data. In an unregulated fishery, fishing will continue as long as it is profitable and will ultimately be limited when the target species are so rare that the returns no longer pay the costs. In saying this, an example of the charter sector being loosely managed is given in your "Initial Draft Discussion Paper on review of Alternate Management Measures, Feb 2012, Page 5. It states, although logbook data are potentially subject to strategic misreporting or non reporting ADF and G will continue onsite interviews which if it appears that a significant portion of charter trips are not being logged the reported logbook harvest could be corrected. WOW. It also states, To date we are unable to find the causes between the discrepancies between the SWHS and the logbooks. SINCE THE TRUE HARVEST IS UNKNOWN, there is no way to know whether logbook data or SWHS estimates are closer to the true harvest. This kind of management infuriates me as I am held to a strict system of checks and balances that makes me 100% accountable for every pound I catch or there instant consequences from federal agents that are paid by a %age of my gross IFQ sales. Why can't I be allowed to create my own data, and go over my quota? Where is the validity in the GHL. In your hesitance to regulate this sector sustainability I am experiencing an erosion in my quota and also a depletion in our resource. I urge you to not change the CSP allocations set in 2008. Thank you.

Subject: comments/Agenda Item C1b, Halibut Catch Share Plan
From: "Tim Evers" <timevers@acsalaska.net>
Date: 9/25/2012 3:29 PM
To: "NPFMC EMAIL Comments" <npfmc.comments@noaa.gov>

Timothy R Evers
PO Box 39547
Ninilchik, AK 99639

September 25, 2012

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

Re: Agenda Item C1b, Halibut CSP

September 25, 2012

Dear Chairman Olsen and Council Members,

I support Council Member Ed Dersham's motion.

The only option possible to consider for allocation at this time is Option 5.

The GAF concept has been met with little support from the charter sector in many areas; it is a short-term solution, however it is much better for our industry to keep this provision in the Catch Sharing Plan. In times of very low abundance, charter operators will be able to stay in business leasing some halibut and offering select clients a two fish limit. Without that, they will lose clients and not be able to stay in business.

The vast majority of the charter industry, , are looking forward to future analysis of a common pool compensated reallocation program to be fully analyzed and considered as a final long term solution for our sector.

In closing. The only way it (CSP) will work is to select Option 5 for the allocation to the charter sector.

Sincerely,

Timothy R Evers

Alaskan Resident Sport fisherman, Retired Charterboat Owner/Operator

Tim Evers <timevers@acsalaska.net>

owner/operator

Fishward Bound Adventures

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

September 19, 2012

RECEIVED
SEP 25 2012

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

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

I write once again to you and the North Pacific Fishery Management Council (NPFMC), regarding the Halibut Catch Share Plan, which the council will discuss at it's October 2012 meeting.

I am a resident of Gustavus, Alaska, have fished halibut both commercially and sport in Icy Strait and Cross sound for 35 years. I am an IFQ holder in area 2C.

I ask that you, and your fellow NPFMC members consider the following points in the deliberation of this critical issue.

1. To date, there are no evidence based release mortality estimates for charter caught halibut. The release mortality for the commercial catch is 16%, which is figured into the overall commercial share. If the council does nothing more before the 2013 season, a reasonable release mortality rate for the charter catch should be initiated and factored into the CSP equation. To do anything less would be discriminatory and irresponsible.
2. The NPFMC should not reconsider allocations of the 2008 CSP simply because of political influence. Your decisions must be based in fact, and there has been no factual economic or biological basis for increasing the allocation of halibut to the charter industry. The charter lobby continues to ask for more, which has come directly from my pocket and those of other IFQ holders. We have invested our futures and that of our family's, only to see that future eroded away by reallocation after reallocation to the charter industry. The CSP economic analysis has indicated that commercial IFQ holders have lost money over the past six years, while charter operators have continued to operate in the black. This has certainly been the case here in Gustavus, despite wailing and gnashing of teeth, the charter industry is alive and doing very well in our area.
3. The reverse slot limit management tool initiated by the NPFMC, appears to have created a condition which I describe as "serial catch and release". Charter operators are quite understandably under great pressure to catch big fish. Now however, while captains continue to try for the "big" one over 65 inches, they

catch and release for hours, or sometimes "hold" fish, in hopes of catching the biggest legal fish possible. Charter clients here openly discuss this practice in Gustavus. Again, with no certain knowledge of catch and release mortality rates, the ramifications of reverse slot limit is unknown and risky at best, and not a practice the NPFMC should be comfortable with.

4. I recommend the adoption of a management tool similar to that which the State of Alaska has used for King salmon, for the sport charter industry. This is a daily bag limit, combined with an annual catch limit. This has proven straight forward for the fisher, relatively uncomplicated, and enforceable.
5. Please consider restructuring the outdated, huge regulatory area management system. Icy Strait and Cross Sound are my home ground. My community is greatly dependent on the health of the halibut and salmon stocks, for our table, recreation and our livelihood. For many reasons, this area has become a mecca for sport charter fishing, and deserves to be regulated as the unique area that it is.
6. I support the present Guided Angler Fish provision.

Thank you for your consideration;

Colleen Stansbury
F/V La Bamba del Mar



Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone. (907) 424 3447 | fax. (907) 424 3430
web. www.cdfu.org | email. cdfu@ak.net

September 24, 2012

Chairman Eric Olson
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

RECEIVED
SEP 25 2012

RE: Item C-1(b); Halibut Catch Sharing Plan

Dear Chairman Olson,

I am writing today on behalf of Cordova District Fishermen United (CDFU) regarding the final action on the Halibut CSP to be considered at the October NPFMC meeting. Our organization represents 300 individuals participating in many fisheries, including Halibut fisheries in Prince William Sound and the Gulf of Alaska.

While CDFU strongly sympathizes with the plight of area 2c commercial harvesters, we make our comments today from the perspective of area 3a harvesters. Although, CDFU favors the allocation percentages in the 2008 preferred alternative, we are more concerned with arriving at a solution to this 17-year-old issue.

The allocation differences between *Alternative 2, 2008 Preferred Alt.* and *Alternative 3, 2012 Preliminary Preferred Alt.* are negligible, especially considering the decline in halibut stocks and the likelihood this trend will continue, a reality that must be dealt with in an equitable manner.

If the Council believes it has all the information it needs to adopt *Alternative 3, 2012 Preliminary Preferred Alt.* then we support that action and resolution of this issue, allowing the council to continue its work on other important issues.

Thank you,

Alexis Cooper
Executive Director

Subject: Agenda item C-3 - bycatch observers
From: sue libenson <suelibenson@gmail.com>
Date: 9/25/2012 3:42 PM
To: npfmc.comments@noaa.gov

As an occasional deckhand, yearly salmon subsistence fisherman, Fish and Game Bristol Bay fish counter, and lover of king salmon, I am concerned that the Council needs to focus resources where it matters - on collecting consistent data on bycatch, especially in fisheries with a history of king salmon bycatch such as the Gulf of Alaska trawl fishery. Let's focus on getting the best information we can about the fisheries that really matter.

Sue Libenson
Haines, AK 99827

Richard Davis
2347 Kevin Court
Juneau, AK 99801
F/V West Bank

North Pacific Fisheries Management Council
605 West 4th Ave., Suite 306
Anchorage, AK 99501

September 24, 2012

Greetings Chairman Olson and NPFMC Members,

Thank you for the opportunity to comment on NOAA's proposed comprehensive Federal fisheries expanded Observer Program.

I fish small IFQs on a Southeast salmon troll-, gillnet-, and longline- combination boat. Situated similarly to hundreds of other small black cod and halibut IFQ longliners, I object to the agency's (NOAA) unwillingness to include an Electronic Monitoring (EM) observer option for the under 60' fleet. NOAA's attempt to produce a comprehensive program hastily, rather than thoroughly, usefully and durably, makes the fleet wonder how the NPFMC Council would not insist that NOAA include a camera option to requiring a human observer on small vessels. We firmly and universally believe that an EM option is essential, and, early in the development of this program, NOAA agreed!

Now, absent of a camera option for us in NOAA's plan, our tax assessment for funding the program will be spent hastily, without regard to the size and available space constraints characteristic of the small boat longline fleet. Obvious to me is the rush to implement the observer program, which eclipses and absolves NOAA of its obligations or agreements to fit the small boat fleet well into the program. The input of the small boat fleet in the program's development must not have had basis or merit. In the industry we work in, rushing things increases human risk and increases stress on equipment.

Please direct NOAA to devote the appropriate time and resources that incorporate EM details into making the program efficient, compact, and workable. NOAA can build this observer program slowly, and make effective alterations that work well within the small boat fleet, until Electronic Monitoring is an element of the program. As proposed, it won't work for the agency or the small boat industry.

Sincerely,

Richard Davis

**Chuck & Kathryn Cohen
F/V LADY BARBARA
P.O. Box 020670
Juneau, Alaska 99802**

September 21, 2012

**Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501**

Re: C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more “public” are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

When I acquired quota, I did not expect that the NPFMC would reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter

fleet does not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to acquire over the past 30 years. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,



Chuck & Kathryn Cohen

to: Mr. Eric Olson Chairm.
North Pacific Management Council
605 W. 4th Ave Suite 306
Anchorage, Alaska 99501
Fax 907-271-2817

Dear Sir,

I have been in the ~~the~~ Halibut Fishery since 1989, I have over \$50,000 dollars of my own money invested in the Fishery, to the point of selling a house I built by hand, to payoff my government IFQ loan.

The 2008 Halibut Allocation and Catch Share Plan should not be changed by political interference, the charter Fleet was gifted 25% above their actual harvest on 2 occasions and is trying to increase their allocation again.

Charter operators and lodges continue to grow and are owned by out of State interests. A local family cannot expect to catch a fish to eat on any given day because the charter Fleet takes most everything up to 60 miles from town, it makes me sick to see charter boats come in with small fish limits under 20 inches.

Many small Halibut commercial fishermen are under water with IFQ and port payments

This needs to be settled once and for all with no more take aways from Commercial Quotas or IFQs. I had to buy all of my IFQs up to 7000 # except the first 150 # I earned, The charter boats can buy their shares like I had to.

STANLEY D HJORT
PO BOX 828
PETERSBURG AK 99833-0828

Sincerely
Stanley Hjort

Date: 9-25-2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name:

Steve Fish 

Address:

P.O. Box 6448 Sitka AK 99835

P.S. I would like to have written my own letter but ran out of time. This expresses my views and frustration with lack of solution. Thank You

SF

9/25/2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The CSP allocations set in 2008 SHOULD NOT be changed because of *political interference*. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota for hundreds of thousands of dollars, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't charter operators invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while the charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you.



Mark J. Severson
FV Odin
PO Box 1502
Petersburg, AK 99833

Stephen Rhoads
111 Jamestown Drive
Sitka, AK 99835
F/V Equity

North Pacific Fisheries Management Council
605 West 4th Ave., Suite 306
Anchorage, AK 99501

September 25, 2012

Greetings Chairman Olson,

Thank you for the opportunity to contribute to the Halibut Catch Sharing Plan discussion.

I am a halibut longline fisherman based out of Sitka, AK. I have been fishing since 1996, and have been a quota holder since 2007. I support my small family with fishing, and have an investment of \$175,000 in the quota share.

I am alarmed at the decision to consider allocating additional fish to the charter sector. I am a firm supporter of maintaining the CSP allocations set in 2008. The commercial fleet has seen dramatic cuts in quota over recent years, based on scientific data, and the fleet has struggled to adjust to the economic effects of these cuts. The charter sector should have an investment option, but a blanket "gift" of 4-5% based on political anglings is unfair to the commercial fishermen who have worked and supported the halibut industry.

Please choose Alternative 3, the 2008 CSP allocations as a protective tool for halibut fishermen in Southeast communities.

Sincerely,

Stephen L Rhoads

Stephen Rhoads



Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9/24/12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

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I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

Sincerely,

Name: PAUL ISAACSON

Address: 3940 ISAACSON RD, Bellingham WASH 98226

I would draft my own letter but this says it all!

Paul Isaacson

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Re: Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson:

September 23, 2012

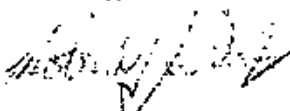
I am a long term Seward resident and commercial fisherman supporting an Alaskan fishing family. I have had a front row seat in observing both the reasons why the IFQ program was created to begin with, as well as the aftereffects; some of which were predictable. One of these would be the long struggle which continues at this meeting over how the charter sector will participate in the need for halibut conservation in the midst of a declining resource. I totally understand and support the need to conserve the halibut resource. I am willing to sit on the beach, for years if necessary, to rebuild threatened halibut stocks or any other of the fisheries resources that I participate in. When I hear charter operators testify that they support the need to conserve our halibut resource as well, I believe that deep down they do. But really, why should they now? When political efforts can be used successfully to push that responsibility onto the other guy, I guess it's not time yet even though the resource has dropped by half or more. Look at the numbers. As an Area 3A fisherman, I have seen 3A IFQ's have cut in half over the last five years as the resource has declined. While on the charter side of this business, from an Area 3A perspective, I have seen the only limitation to full speed ahead to be that of the health of the tourism economy. The latest reallocation argument by charter owners seeks to expand the charter GHF in order to maintain business as usual for a while longer as the halibut resource continues to decline.

Since I had to buy almost every quota pound I have ever fished (now transferred to my sons but still hooked to the bank), I feel that when the pounds I bought and am still paying for with hard work and sacrifice are reallocated away to the charter group repeatedly with no compensation, this amounts to fraud and theft. It's difficult to swallow the whining unwillingness of the commercial charter group to conserve, in spite of their rhetoric. Here we are at this Council meeting, discussing the reallocation of halibut IFQ pounds from setline to charter once again. This, while it is established in the website documents that at the lowest tier resource level, the CSP as it now stands already "allocates a larger percentage of the combined CEY to the charter sector".

I support the GAF provision, or any other method of allowing the charter sector to invest in a level IFQ playing field where risk and inevitable resource variability are shared equally by both sectors.

In response to the Motion and Options on the table, I urge the Council to maintain the integrity of the RAM program for all commercial participants. I support the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

Sincerely,



Robert Linville
PO Box 1753
Seward, AK 99664

Richard Davis

F/V West Bank

2347 Kevin Ct.

Juneau Alaska

99801

Greetings Chairman Olson, and NPFMC members,

I am a 49 year old resident of Juneau with continuous commercial fishing industry harvest since 1974. I have been involved in halibut harvest in regulatory areas 2C and 3A since the inception of the IFQ program. I financed the purchase of nearly 60% of the halibut IFQ I hold. My son purchased all of his halibut IFQ.

I am a member of the Halibut Coalition, Southeast Fisherman's Alliance, and Seafood Producers Cooperative. I am also a life member of the United Fishermen of Alaska, and the Alaska Troller's Association. I currently serve as a director of the UFA, Alaska Longline Fishermen's association, and the Northern Southeast Regional Aquaculture Association.

I support the testimony of ALFA and the Halibut Coalition on the halibut catch share plan before you. No fisherman's investment in this halibut fishery is remotely prudent or secure until an end to the continued reallocation is reached.

I would appreciate action by the council to safeguard the effort and investment of halibut IFQ longliners.

Sincerely,



Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: Sept 25, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

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Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

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I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name:

Henry Niemi Jr.

Address:

100 Kennel St Apt. 407 Bengtson Bld.
Whittier, ALASKA

Dear Sir

I fish for food. please! don't take more quota for the fish for few people. I PAID.

Henry Niemi

Please include these comments in Council Members packets for the upcoming meeting.
Thank you

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

Re: Agenda Item C1b, Halibut CSP

My family and I have been in the halibut charter business in Homer for 35 years. We have done it all: 6 passenger charters, multi day charters, long range charters, 22 passenger charters, combo salmon/halibut charters, ½ day charters, combo rockfish/lingcod/halibut charters and salmon charters. Our 24 year old son has been a charter captain for us for the past six years and will likely take over the business. I have been to and testified at so many IPHC, AP and Council meetings over the past 20 years that I have lost track of how many. I believe I know what does and does not work for my business.

I am opposed to the CSP. It has nothing to do with fairness or conservation. When the CEY for 3A rises to 20 mlbs and above, the charter allocation will actually drop while the commercial allocation will rise. It is complicated and unwieldy. The stair step provisions in the original GHL are a more fair management tool for the charters. The GAF provision to me is just another way for long liners to make money without having to fish. Already there are original QS holders who are allowed to lease their QS and never have to set foot on a boat.

I believe we all have a responsibility for conservation of the resource. However the 3A charter fleet has stayed within the limits of the GHL all but one year since implementation. Now that we have limited entry the charter fleet has been substantially reduced. I like the current GHL, with the management tools that are already in the toolbox. The only reason for the CSP is to reallocate from the charters to the long liners as the CEY rises. Not fair and not right. If the CEY is reduced further, putting us over the GHL, why not use the current regulatory tools to constrain the catch?

The charter released halibut mortality rate has been estimated at 3% but no real current studies have been done. My personal view is the mortality rate is much lower as the charter crew has plenty of time to gently deal with a fish. Also the public does not like to see fish abuse.

On the other hand the long line U32 mortality is estimated at 6%. I believe it was something like 1.2 million pounds in 3A in 2010. That U32 mortality should be addressed and reduced.

The other conservation measure to address is the laughable 15% reduction of halibut by-catch in the trawl fleet. Until there is 100% observer coverage on the trawlers there will never be a way to know that they are even reducing the by-catch by 15%. Long liners should have 100% observers also. I have 100% observer coverage on my boat everyday and they should too.

I depend on crew fish to feed my family fresh halibut during the summer and to store some up for the winter. Rather than completely cut it out under the CSP how about a punch card with X number of halibut allowed for the year. Crew fish could be recorded in the logbook the same as they are now. I think boardings and dockside checks work. The professional charter operators I know will not abuse this provision. The home fish are too important to us. Long liners get to bring home fish for personal use and so should we.

The CSP sets up unfair competition within the charter fleet. 6 passenger endorsement permits can lease up to 400 GAF or 66% of their capacity. On my 16 passenger vessel I could only lease 600 GAF or 37% of my capacity. Hello. I don't think this was intended. Why would you give one sector of the charter fleet an advantage over another? I know the GAF provision was never meant to be fair and never meant to replace the 2nd fish lost in the CSP but GAF should be equitable throughout the charter fleet.

Since only a small amount of GAF will be made available it really only favors rich fishermen, expensive charters and lodges. Most of my clients are middle income fishermen and I don't believe they will be willing to pay \$100 for a second fish. I expect less business because they also will not pay current charter prices for one fish.

The leasing of GAF will be cumbersome and confusing as the amounts available will change every year. How can GAF possibly be enforced and how much will enforcement cost? What GAF is available will end up going to the highest bidder and my middle income clients will be cut out of any opportunity for that second fish.

There is a possibility that rogue charter operators and private fishermen will take people out under the guise of "just taking out my friends" and allowing them to catch 2 fish per person if the charter fleet is reduced to one fish.

In summary:

Use the current GHL and the tools already available for management or adjust the CSP allocations to more closely align with the GHL allocation that was deemed "fair and equitable" in federal court.

Clean up the glaring conservation problems in the long line and trawl fleets.

Have some provision for retention of crew fish.

I would like to see the inequity of available GAF between 6 angler permit holders and more than 6 angler permit holders cleared up.

Sincerely:



Sean Martin

North Country Charters

Homer, Ak 99603

907-235-7620

Sept. 25, 2012

Mr. Eric Olson, Chair
N. P. F. M. C.

Dear Council Chair,

I am a Halibut skiff fisherman in Sitka, AK. I have been longlining for over 30 years. A recipient of initial halibut quota, I have purchased additional shares in recent years. Currently I owe more money on loans than I have paid for my purchased quota.

I am very concerned with proposals that would re-allocate another 4-5% of combined catch to the charter sector, in areas 2C and 3A.

The commercial sector has seen dramatic cuts in quota pounds in the past three years. We have to struggle very much to make ends meet when making payments on loans. Losing quota shares to another sector is hard to swallow when our drastic cuts were based on scientific data of stock abundance. If more quota could be made available to the charter sector through leasing from the commercial users, I feel that would be a better market based option.

Please adopt the allocation measures put forth in October 2008 as a fair protection tool for Halibut users in our coastal communities.

Sincerely,
Terry Perensovich

Terry Perensovich
506 Baranof St.
Sitka, AK 99835

Fax to (907) 271-2817 or mail to arrive by COB Sep 25, 2012

Date: 9-24-12

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: Halibut Catch Sharing Plan (CSP)

I SUPPORT the catch sharing plan percentage allocations adopted in 2008 and detailed comments submitted by the Halibut Coalition.

The allocation percentages adopted by the Council in October 2008 are fair and equitable because they protect historic consumer access, the setline fishery, coastal communities, and provide a reasonable level of access for guided anglers at all levels of halibut abundance. It is important for all sectors to share in conservation of halibut, equally, at all abundance levels. The CSP allocations set in 2008 SHOULD NOT be changed because of political interference. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and is again trying to increase their allocation by obstructing final regulatory action.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group.

The IPHC should be delegated authority to annually set bag and size limits for charter to maintain the charter harvest at or below their allocation; this is the most effective way. This will correct previous problems with the charter sector frequently exceeding their allocation.

I support the Guided Angler Fish provision that allows charter operators to lease quota if their clients want more fish. Why shouldn't they have to invest if they want more quota??

My family is dependent on income from the halibut setline fishery and uncompensated reallocation to the charter sector hurts both my family and community.

The CSP supplemental analysis establishes that commercial fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does not need more halibut at the expense of commercial fishermen and the communities that depend on them.

Thank you for the opportunity to comment.

(SEE ENCLOSED LETTER)

Sincerely,

Name: SIDNEY A. NELSON

Address: Box 564, HOMER, AK. 99603

9-24-12

DEAR NPFM COUNCIL.

I HAD TO BUY MY MODEST AMOUNT OF HALIBUT QUOTA AT MARKET PRICES.

I ACCEPT THAT REDUCTIONS NEED TO BE MADE IF THE RESOURCE DECLINES.

I BELIEVE IT IS WRONG TO TAKE THE QUOTA THAT I BOUGHT AND GIVE IT TO THE SPORTIES. THEY NEVER PAID ANYTHING FOR THEIR QUOTA, AND MOST OF THEM GOT VALUABLE CHARTER PERMITS, FREE IN THE MAIL.

IT IS JUST PLAIN STEALING.

THANKS
SID NELSON
BOX 564
HOMER, AK
99603

907.235-4021

PAGE 2 OF 2

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

September 24, 2012

Dear Mr. Olson,

This letter is in regards to the C-1 Halibut Catch Sharing Plan.

I have been a commercial longline fisherman since 2005. Before that I spent 26 years fishing crab in the Bering Sea. The capital I accrued from the crab fishery as a boat owner and captain, was invested into my longline operation. My initial investment into halibut IFQ alone was over \$1,000,000. Since my initial purchases of IFQ, the quotas in area 2C have decreased by 80%. In 2009, I was granted a NMFS loan of \$400,000 with which I bought IFQ in 3A. The poundage of halibut IFQ I purchased with the loan money has decreased 35%, which has put me "underwater" for that loan.

Fishing quotas go up, and they go down. That is part of the business. The amount of fish I am allowed to catch should be based on the health of the fishery and the size of trying, by any means possible, to take away fish that I have paid the right to harvest. The charter industry needs to play by the same rules as the commercial industry. If they want to harvest halibut, they need to invest in the right to catch it.

The new CSP PPA (and the additional reallocation options) that are under review has the potential of taking 4-5% of the combined charter/commercial catch and gifting it solely to the charter industry. This would take money directly from commercial boats that have played by the rules, that have invested heavily in IFQs, and that, on the whole, have been losing money. Then, give that percentage to charter boats that have abused the rules, that invested only in their boats and lobbying efforts, and have been making money because they did not have to purchase or borrow money for the rights to catch halibut. If this proposal is adopted it will put many commercial operators over the edge and out of business.

Please put a stop to this welfare system for the charter industry. Enough is enough! If the charter industry wants more halibut to catch they should have to INVEST in it just like anyone else.

With that being said, I support the Catch Sharing Plan percentage allocations originally adopted in 2008. I also support the ability for charter operators to lease quota through the Guided Angler Fish provision. This is the fair solution and I ask the Council to recommit to these allocations.

Sincerely,



David Thompson, F/V Aleutian Sun
POB 2192
Petersburg, AK 99833

Randy and Dina Gregg
F/V Patriot
PO Box 20373
Juneau, Alaska 99802
907-463-4430

September 16, 2012

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

Dear Mr. Olson,

RE: C-1 Halibut Catch Sharing Plan (CSP)

My wife and I are Alaskan born commercial fishermen. We both are Halibut IFQ share holders since the program began in areas 2C and 3A. I was allotted a small amount of halibut shares initially and then I purchased the rest while my wife had to purchase all of hers over time. My allotment of IFQ's was a quarter of what I caught annually before the IFQ system was put into place. We have taken our two Alaskan born kids, now in their teens, out long lining with us every year until this year due to their school obligations. I come from a commercial fishing family with a dad who longlined, crabbed and caught many salmon over the years. My wife hand trolled salmon with her grandfather as a kid.


We feel we are like farmers who bring a nutritious food source to many people who would not be able to obtain this food otherwise. Not everyone is able to afford the expense of flying to Alaska to catch fish so we provide them the opportunity to access those fish by catching halibut for them. 7-9 million Americans as well as 2 million non-Americans are able to enjoy the fish commercial fishermen catch and sell. Charter clients have approximately 230,000 clients per year who are able to enjoy the excitement of catching their own halibut. I had the opportunity to sport fish (as well as hunt) elsewhere and I go fishing with the full knowledge there is no guarantee that I will even catch one fish! I know I have to follow strict guidelines to protect resources. Those are the rules put in place to participate.

When we purchased our quota, we did not think those IFQ's would one day be reallocated to another user group. We purchased these shares, investing a lot of money to do so. The charter sector has been given the same opportunity by leasing quota through the Guided Angler Fish (GAF) provision and we think they should start investing in themselves the same way we had to in order to keep fishing halibut. We have seen our quota shrink every year to preserve resources and no monetary compensation was given to us.

We support the changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. We support the GAF provision. It is time the Charter operators invest in themselves just as commercial fisherman have done. What we cannot support is yet another reallocation to the charter operators of the halibut quota we have worked hard to purchase over the years.

Thank you for this opportunity,

Regards,


Randy and Dina Gregg
PO Box 20373
Juneau, Alaska 99802

Bruce J Gabrys
10229 Baffin Street
Eagle River, AK 99577

September 24, 2012

Sent by Fax: (907) 271-2817

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

Dear Chairman Olson,

Re: Halibut Catch Sharing Plan (agenda item C-1)

I support the Halibut Catch Sharing Plan (CSP) and urge the Council to retain the CSP allocations as adopted in 2008.

As a commercial halibut fisherman in Area 3A for the past 29 years, I am economically dependent on the Halibut fishery and have made substantial purchases of Individual Fish Quota (IFQ) to remain in the fishery. Further cuts and/or reallocations from the halibut longline fishery will put many of us out of business.

I am particularly offended by the proposed reallocation adjustment that attempts to match the CSP allocation to the Guideline Harvest level (GHL)! Where is the "sharing of the conservation burden" in that? In setting the GHL, the charter fleet was given an allocation 25% above their actual harvest. For the 2012 season my halibut quota is half of what I was previously allowed to catch. For Area 2C Longliners the cuts were even worse.

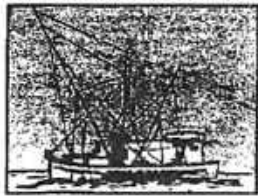
If the halibut charter operators want/need more halibut to support their business plan, they can lease it through the Guided Angler Fish (GAF) provision. My business plan required me to spend money to increase my quota, why shouldn't they?

In closing, I ask the Council keep in mind that this issue is not just about charter operators and commercial fishermen. It is ultimately about public access to the halibut resource. Longline fishermen bring the fish to the Public; charter operators take the Public to the fish. There are millions of consumers that enjoy healthy and tasty halibut meals in restaurants and/or through the grocery store. Many members of the Public cannot afford the luxury of taking a halibut charter. These consumers won't be at the October Council meeting, but protection of their equitable access to the halibut resource is also the job of the Council.

Sincerely,



Bruce J Gabrys



Alaska Trollers Association

130 Seward St., No. 211
Juneau, Alaska 99801
(907) 586-9400
(907) 586-4473 Fax

September 22, 2012

Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501

Dear Chairman Olson,

Re: Agenda Item C-1 Halibut Catch Sharing Plan (CSP)

Dear Mr. Olson:

The Alaska Trollers Association (ATA) is writing yet again regarding the need to solidify a catch sharing plan for halibut. Resolution of this issue has eluded the North Pacific Fishery Management Council (Council) and those involved in, or affected by, both the commercial and charter sectors for two decades. The pursuit of a reasonable program to fairly distribute the halibut resource has taxed government and industry budgets, and frayed relationships in townships throughout Alaska. It is nearly impossible to adequately express the disappointment felt by so many.

Since 1925, ATA has represented the interests of small boat hook and line salmon fishermen operating in state and federal waters off the coast of Alaska. With more than 2,600 permit holders, the troll fleet is the largest in the state and is 85% resident; about 1 of every 35 people in Southeast Alaska works on one of our boats. Troll vessels range from 16 to 60 feet in length. Since the late 1800's, halibut has been an important component of many troller's annual harvest.

Trollers who longline typically hold IFQ in areas 2C and 3A. Whether or not they received initial IFQ shares, many had to buy into the federally mandated program, at great cost, simply to maintain a viable business. The promise of the IFQ program was supposed to be a more stable and rational fishery. Instead, fishermen have been put at significant financial risk from both a precipitous drop in the annual halibut TAC and a persistent de-facto reallocation to the charter sector.

While our members support the Council's worthy intent, as stated in the CSP Environmental Assessment (NOAA, p. xvi), we fear that some of the concerns expressed in the document have already occurred. For instance, destabilization of the seafood industry and negative impacts on local resources and users. We anticipate the situation will grow worse under each of the alternatives you are presently considering.

ATA opposes the Council's Preliminary Preferred Alternative 2 (PPA), as our members simply cannot support any additional reallocation of halibut to the charter sector. **Therefore, the option before you that best fits ATA and the Council's common goals and objectives of streamlining, clarifying, and improving charter sector data and management tools, might be Alternative 3 modified to cap the charter sector allocation at the level established in the 2008 CSP.**

For 20 years the Council and public have hashed out the issue of halibut allocation and worked to rationalize the guided sportfish harvest. These efforts have been thwarted by obstructionism and inertia at the highest levels, which is exceedingly frustrating to halibut fishermen and potentially dangerous for the resource. Under the GHL system, IFQ holders have lost 75% of their harvest share, which has already put some vessel owners, deckhands, and processing workers out of business. Others are now on the brink, through no fault of their own. In contrast, the charter sector lost

35% during the same time frame, and the Council's economic analysis reveals that they have been able to compensate for the reduced harvest by raising prices and increasing revenues. This is not an option for the commercial sector.

Most of our members own modest amounts of quota to supplement other fishing revenue. Such diversity can make a big difference in the success of a fishing business plan. Without it, there is no financial buffer during those times when abundance of our key target species dips, or fish and fuel prices fluctuate, or the boat needs a new engine. With the significant erosion in harvest share, we see many people struggling with nowhere to turn - most fisheries are limited and expensive to buy into. This is further complicated when you are trying to pay off existing IFQ loans. Commercial fishermen have followed the rules and invested in a program established by the government, which billed IFQs as the best way to protect the resource and provide stability. Instead, that same government has allowed the rug to be pulled out from under an entire industry, by neglecting to stop this de-facto reallocation. Jobs and the economy?? Providing fish for the nation?? Balancing trade deficits?? It all rings pretty hollow to our fishermen with vanishing IFQs.

Both the commercial and sport industries provide jobs for our communities, but there are important differences to consider when determining harvest shares. Each year the seafood industry provides halibut to nearly 10 million Americans and boosts US trade through exports to millions of others. The charter industry caters to less than one quarter that many clients per year. Allocations should reflect that fact, with effort focused on providing halibut products to the widest span of people, while providing good sport fishing for residents and solid job opportunities for each industry sector.

Recognizing the challenges involved in bringing the charter sector under a complex allocation program, our industry worked hard and offered many compromises. Each round of negotiations resulted in the seafood industry supporting significant quantities of halibut being added to the sport sector's collective creel, in hopes of reaching a settlement. In 2008, it appeared we had succeeded, yet here we are again! This war of attrition has been exceedingly damaging to commercial fishermen, processors, and those business that support us. There is just no more to give. Longliners have been substantially cut back in recent years, in part to absorb the impact of sport overages. Those cuts have led to a loss of jobs that resonates through our communities and the state.

Our members do not condone allowing any user group to grow without bounds and displace existing users; it's bad resource management and poor economic policy, particularly for a region that badly needs jobs. However, this is precisely what has been allowed to occur. Reductions for conservation are one thing, but chronic erosion of harvest through de-facto re-allocation is wholly different, totally unacceptable, and does not achieve the goals of the federally mandated IFQ program.

It is time to implement a program and provide stability for our region's fishermen that stops the loss of harvest share for the commercial sector. If the 2008 plan needs some refinements to improve data and management systems, we're all for that. But please, move forward - not backward!

For the mutual long-term benefit of the seafood industry and consumers; sportfishing guides and clients; and the many independent anglers - all who bring value to our coastal communities - we urge your support of the fair catch share plan that does not take even more from the seafood industry.

Thanks in advance for your consideration.

Sincerely,



Executive Director

Polar Star, Inc.

P.O. Box 2443 • Kodiak, AK 99615
Phone: 907-486-5268 • Fax: 907-486-5418 • E-Mail: pikus@polarstar.net

September 25, 2012

Eric Olson, Chair
North Pacific Fishery Management Council

Re: Agenda Item C-1B, Halibut Catch Share Plan Final Action

Dear Eric:

I urge the council to adopt the original Catch Share Plan allocations selected in 2008.

I own and operate two vessels, the *Polar Star* and the *Miss Lori*, that participate in the commercial halibut IFQ fishery in the Gulf of Alaska. I have invested a huge amount of money over the years purchasing halibut IFQ, and I currently pay out a significant amount of my annual income on halibut IFQ loans. Especially given the current steep decline in the halibut exploitable biomass, we need the stability of knowing that those managing the resource will not reallocate it. This issue should have been settled in 2008 when the council took final action on the catch share plan. Instead, I see that the charter interests are demanding yet another unwarranted increase in their allocation. They have already had *two* increases above their actual harvest. To give them yet another increase would be grossly unfair to those of us in the commercial sector who have to purchase IFQ, at tremendous expense, if we want to increase our harvest. Enough is enough. The charter sector is obstructing final regulatory action through political pressure to increase their allocation. The original allocations set in 2008 should stand.

The charter sector maintains that they are being unfairly economically damaged by the allocations in the original catch share plan. However, the catch share plan analysis indicates that, with the current low levels of halibut exploitable biomass during the past six years or so, it is the commercial sector that is truly hurting. Indeed, commercial fishermen have lost money while the charter sector has made money. The charter sector does not need and does not deserve another allocation increase. There is a provision in the catch share plan, the Guided Angler Fish provision, that provides a mechanism for charter operators to acquire halibut quota through purchase, which is what we in the commercial sector have to do if we want more quota. Fair is fair.

In summary, the council should leave the catch share plan allocations as they were set in 2008, and should not give the charter sector another increase. Let's put this issue to rest and move on.

Thank you for your consideration.

Sincerely,



Patrick J. Pikus
Polar Star, Inc.

HALIBUT ASSOCIATION OF NORTH AMERICA

P.O. Box 872
 DEMING, WA 98244
 360-592-3116

HALIBUTASSOCIATION.COM

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 The Canadian Fishing Co., Ltd.

WASHINGTON

Dana F. Besecker Co., Inc.
 North Pacific Seafoods
 Seafood Producers Cooperative
 Trident Seafoods Corporation
 UniSea, Inc.

OREGON

Pacific Seafood Group

September 25, 2012

Mr. Eric Olson
 Chairman
 North Pacific Fishery Management Council
 605 West 4th Avenue, Suite 306
 Anchorage, AK 88501

Re: Item C-1(b) Final Action on Halibut Catch Sharing Plan

Dear Chairman Olson,

The Halibut Association of North America represents 80% of the companies that buy or process halibut in Alaska, British Columbia, Washington and Oregon. Our Alaska members buy fish from the longline fleet in every regulatory area in the state. HANA has represented processors for more than five decades, and many of our members have been buying halibut for twice that long.

Our position on item C-1(b) can be summed up in two words: "Enough already!" We're not talking about the seemingly endless shifts and shapes this management effort has taken since 1993. We're talking about the relentless pressure for more fish from the charter sector.

That fleet was gifted 25% more than their highest catches in the initial allocation for a Guideline Harvest Level (GHL). Delays happen and "historic high catches" become, well, history. Cue the violins again and an additional increased allocation was set three years later. Finally a moratorium is called on this burgeoning industry that is starting to take more than their GHL and continues to incur overages for five years in a row. Managers compensate by reducing the commercial fleet's allocation the next year.

In 2008, HANA was part of the group that helped write the Catch Share Plan, which gave the charter industry yet a higher allocation. We were willing to give a little then because we wanted it over. Despite general agreement among many of the charter management advisors, a well-orchestrated tsunami of letters attacked that plan after it was published in the Federal Register last year. The chief complaint was there wasn't enough fish for the charter sector in times of low abundance. Last April we got a new Preliminary Preferred Alternative that increased the charter allocation by more than 5% in Area 2C and nearly 12% in Area 3A. Enough already!

These increases are not merely moving a line on a pie chart or statistical table. They are not merely rewarding a fleet that has not stayed within its catch limit with fish from a fleet that has always stayed within its catch limit. In real terms, this uncompensated reallocation from the longline sector could mean layoffs in plants during part of the year throughout coastal Alaska, shrinking the fleet even further by reducing IFQ holdings, and threatening Alaska's long-held position as the premier source of halibut in the world's seafood market.

HANA urges the Council to adopt a modified Alternative 3, where the allocation percentages (with the exception of the range feature, which can be eliminated) remain the same as in Alternative 2 (the 2008 Preferred Alternative). These numbers are fair, equitable, and higher than in Alternative 2 since there is no + or -3.5%.

In addition, HANA urges the Council in the strongest terms to move with all possible speed to institute electronic reporting of charter harvest and wastage. The Herculean efforts thus far expended by the staff and Council members to craft a fair CSP are worth little if we continue to rely on the honor system for accounting charter removals.

Thank you for your consideration.

Sincerely,



Peggy Parker
Executive Director

cc: Senator Lisa Murkowski
Senator Mark Begich

Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone: 907-586-6652

Fax: 907-523-1168

Email: seafa@aci.net

Website: <http://www.seafa.org>



September 25, 2012

North Pacific Fishery Management Council

605 W. 4th Avenue, Suite 306

Anchorage, AK 99501-2252

RE: C-1 Halibut Catch Share Plan

Dear Chairman Olson, and Council Members,

Southeast Alaska Fishermen's Alliance (SEAFA) would first point out that many commercial fishermen/IFQ permit holders will be unable to attend this meeting as their shrimp and Dungeness crab seasons start on October 1st.

SEAFA membership supports the management structure and the guided angler fish program (GAF) contained within Alternatives 3-5 but do not support an increase in the allocation to the Charter sector contained with these alternatives. We still believe that the allocation provided in the 2008 CSP (Alternative 2) is still more than fair and equitable to the two sectors.

The following statement was contained within the analysis and gets to the heart of the frustration that commercial fishermen feel regarding the inability to reach a conclusion to this issue over 20 years. *"CEQ regulations require a consideration of actions, whether taken by a government or by private persons, which are reasonably foreseeable. This is interpreted as indicating actions that are more than merely possible or speculative. Actions have been considered reasonably foreseeable if some concrete step has been taken toward implementation, such as a Council recommendation or the publication of a proposed rule. Actions simply "under consideration" have not generally been included because they may change substantially or may not be adopted, and so cannot be reasonably described, predicted or foreseen."* Commercial fishermen keep trying to reasonably plan for their business based on "final" Council recommendations. Yet once again, the allocation is being re-considered.

We believe the 2008 CSP allocation is "fair and equitable" when you consider the background of the GHL. The GHL was set at 125% of the historical harvest of 1995-1999. The Federal Register 68 FR 47256, August 8, 2003 stated, "The GHLs equal 1,432,000 lb (649.5mt) net weight in area 2C and 3,650,000 lb (1,655.6 mt) net weight in area 3A. These amounts equate to 13.05 percent and 14.11 percent respectively, of the combined guided recreational and commercial allowable harvest." This was determined off of the equivalent of the commercial catch limit that we are now calling it. Halibut Coalition has a good summary of this issue within their comments we support.

SEAFA believes that many 2C commercial fishermen will participate in the GAF program just because the amount of quota share has gotten to the point to be unprofitable to make a trip with their vessel. It is a voluntary program that charter operators can take advantage of or not. And is a very important component necessary for this CSP to meet the objectives of the problem statement.

The 2012 Management style is where many of us have tried to get to but could never quite make it there to shorten the delayed feedback loop that was so problematic with the GHL and the 2008 management matrix was the closest we thought we could accomplish so this is an improvement over the 2008 CSP that we support.

This issue needs a resolution, it was in December of 2005 that ADFG Commissioner McKie Campbell promised a fast track resolution to this issue, 7 years ago and has been 20 years since the issue of reallocation was brought before the Council.

While SEAFA supports movement to a verified charter logbook as an improvement over the SWHS for timely data, we do not support an allocation disguised as an adjustment factor, it is reallocation of additional fish to the charter sector.

In summary, SEAFA supports a blend containing the allocation in Alternative 2 and streamlining the CSP with a GAF component as contained in alternative 3. Please carefully and with due diligence debate final action on a halibut CSP and put this issue to rest.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director

Subject: Comments: Agenda item C-1(b)
From: jeff farvour <jefarv@gmail.com>
Date: 9/25/2012 3:55 PM
To: npfmc.comments@noaa.gov

Dear Chair Olson and Council members,

My name is Jeff Farvour and I am writing to the Council, as I have for the last 8 years, to ask the Council to please stop the reallocation of halibut quota from the commercial sector to the charter sector and give stability to all that are affected by this issue. I have spent all of my savings as a commercial fishing deckhand to buy 2C halibut quota over the years so that I can stay and live in Sitka and commercially fish for a living. I have accepted the conservation cuts that have come with purchasing halibut quota but am not able to recover my investments in halibut quota yet (hopefully that will change soon). I also am not asking another halibut fishing sector to pay for those cuts merely just to level the playing field so our fishing communities can move on.

I cannot support any of the alternatives in the analysis but I can support the allocation portion of alternative 2 with the management of alternative 3 and GAF. The best available science in 2008 that the council had to set the charter allocation for the CSP was and is the SWHS. To suggest that an reallocation adjustment should be made because now the logbook program has been improved and could be used as the official recording keeping is to me a dangerous precedent. Much testimony was given to the Council about under and over reporting in logbooks depending on the issue in front of the Council.

Under times of lower halibut abundance the analysis clearly points out that the commercial sector is more economically harmed than the charter sector. Conversely, the charter sector is less economically affected by lower bag limits. Again, I fail to see how reallocating more halibut to charter sector will help in any way. The commercial sector fishes halibut for 8 months bringing money into to our communities for a much longer portion of the year than the charter sector, every fish that we bring is is counted, our boats are more spread out instead of concentrated close to town and we accept the tough cuts to our quotas to protect the resource.

Thank you for the opportunity to comment and your service on the Council.

Sincerely, Jeff Farvour
Sitka, AK

Sitka Charter Boat Operators Association

PO Box 2422 Sitka Alaska 99835

September 23, 2012

Mr. Eric Olsen, Chairman
North Pacific Fishery Management Council
605 W 4th Ave. Suite 306
Anchorage AK 99501

RE: C-1(b) Final Action on Halibut Catch Sharing Plan

Dear Chairman Olsen,

On behalf of the 35 members of the Sitka Charter Boat Operators Association, I wish to submit the following comments pertaining to the Halibut Catch Sharing Plan (CSP). We feel several issues need to be addressed prior to submitting this halibut CSP to NOAA for approval.

1. In *Van Valin v Locke*, Judge Collyer determined the charter sector Guideline Harvest Level (GHL) to be fair and equitable. In the proposed CSP, the charter allocation noticeably drops below the GHL at certain Combined Catch Limits. This needs to be adjusted before gaining approval from NOAA. It is certainly not fair to start off a CSP with a charter sector allocation under the GHL, requiring the charter sector to lease halibut pounds back from the commercial sector.
2. The method of transfer between sectors, namely Guided Angler Fish (GAF), will not work. There are many serious problems with GAF as listed in the ACA letter. GAF is either going to be too costly or not available for the majority of charter operators. GAF will not provide stability to the charter sector in times of low abundance and it seriously conflicts with the definition of sport caught fish, which cannot be sold.
3. Because the economic and wastage data used in analysis is lacking or outdated, accurate charter and longline sector accountability is not possible. In addition, because the trawl sector removes a significant amount of 026/U32 poundage, it is vital that *all* sectors be included and held accountable for their wastage when sector accountability is determined.
4. We also are concerned that replacing the GHL allocation with the alternatives presently under consideration will leave the guided sport sector with illogical "jinks" on the allocation curve. We support the calculation formulas proposed by the Alaska Charter Association (ACA)

which gives a smooth and appropriate increase in allocation that floats with abundance.

5. The proposed CSP bans halibut harvest by skipper and crew. As personal use and sport fishing, resulting in "Home Packs" are allowed on longline vessels, it is grossly discriminating against the charter fleet to force skippers and crew to take a day off to harvest halibut for personal use.

Of further note, while input from the Council's Charter Implementation Committee is an improvement over previous Council task committees, we are concerned about the missing public comment period required by the Administrative Procedures Act. There is a need for recreational angler/public input to the process. We hope the Council corrects this issue as well.

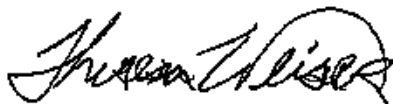
A major reason for establishing the commercial IFQ program revolved around the safety issue. The safety factor is prominent once again, but this time it concerns the unguided sport angler. More liberal bag limits for unguided versus guided anglers has encouraged sport anglers to fish Alaska's waters on their own instead of hiring a US Coast Guard licensed charter captain. We advise the Council to be careful of measures which may have unforeseen results regarding the safety and harvest by unguided recreational anglers.

Lastly, we feel this Council has an opportunity to put the "war" between the commercial and recreational sectors to rest. Approval and implementation of the proposed CSP will only prolong the animosity between sectors by reducing the GHF allocation for guided anglers and awarding the reduction to the commercial sector, with an option to lease poundage back.

Southeast Alaska (Area 2C) has been well within the GHF for the past several years. We believe managing the charter sector by the GHF until a Catch Accountability Through Compensated Halibut (CATCH), pool-based catch sharing plan is developed, will accomplish the same objective as the proposed CSP, but in a more equitable and acceptable manner.

Thank you so much for your attention to this matter.

Sincerely,



Theresa Weiser
President (SCBOA)
Sitka Charter Boat Operators Association



September 25, 2012

Eric Olson, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 9501-2252
npfmc.comments@noaa.gov

Dear Council Chair Olson,

Kenai River Sportfishing Association (KRSA) is a 501(c)3 charitable non-profit association of anglers and conservationists dedicated to the sustainability of fisheries resources in Alaska. Many of our members access the marine fisheries of 3A Southcentral Alaska, and use both guided and non-guided boats while fishing for halibut. We would like to provide comment on the final action (C-1 b) for the Halibut Catch Share Plan (CSP) at the October meeting of the North Pacific Fishery Management Council (NPFMC).

ALLOCATION

Of the available alternatives outside of the status quo with GHF, KRSA supports the CSP allocation proposed within Alternative 5, with the following caveats:

- Use of logbook data instead of the statewide harvest survey data; and
- Suitable "flattening" fix for the "jinks" effect that reduces allocation to guided sector at abundance levels where allocation percentages change.

The draft analysis acknowledges that Alternatives 2 – 5 all involve a transfer of allocation from the guided charter sector to the commercial sector when compared to the status quo GHF. KRSA supports Alternative 5 as it shifts the least amount of poundage from one sector to the other and affords the guided charter sector with the most management flexibility for implementing annual management measures.

For 2012 in 3A, Alternative 5 would have shifted 234,000 lbs. (8 percent reduction) and Alternative 3 would have shifted 758,000 lbs. (25 percent reduction) from the guided charter to commercial sector. The draft analysis states that the ex-vessel benefit of this shift in allocation to the commercial sector would be \$1.3 million (Alternative 5) to \$4.1 million (Alternative 3). The draft analysis states that it is too

complex a subject to estimate loss economic revenue to the sportfishing industry. However, using per day expenditures for guided saltwater anglers (ADFG 2007 report on economic impacts and contributions of sportfishing in Alaska), an estimate can be provided as to how much economic potential will be removed in the guided sportfishing industry from both of these alternatives.

In 2011, the average weight in 3A of halibut harvested in the guided charter sector was 15.2 lbs. The lost allocation in Alternative 5 equates to a net reduction of 15,400 fish, while Alternative 3 equates to 49,900 fish. At the current 3A two fish per day bag limit, a reduction of 15,400 fish equates to 7,700 angler days, while 49,900 fish equates to 24,950 anglers days. These are angler days that will be removed from the guided sportfishing industry and represent the potential magnitude of lost economic expenditures in the guided sportfishing industry on an annual basis.

Saltwater guided resident anglers generate \$466 in average per day expenditures for trip-related items only, including package trips (lodging, fuel, food, travel packages, etc.), while saltwater guided non-resident anglers generate \$744 per day. The combined average of resident and non-resident guided saltwater anglers is \$605 per day. Alternative 5, with a withdrawal of 234,000 lbs. or 7,700 potential angler days, equates to "lost" economic potential to the guided sportfishing industry of \$4.66 million, while Alternative 3, with a withdrawal of 758,000 lbs. or 24,950 potential lost angler days, equates to "lost" economic potential of \$15 million.

The draft analysis states that the shift in allocation from the guided sportfishing industry to the commercial sector is based solely on allocation considerations, and not conservation considerations. Hence KRSA supports Alternative 5, which limits the lost economic potential to the guided sportfishing industry in 3A at \$4.66 million instead of \$15 million, with similar considerations for lost economic potential in 2C.

It should be noted that in 2012 the Upper Cook Inlet (UCI) salmon fisheries were declared an economic disaster by the federal government through the US Department of Commerce disaster declaration process. Within the UCI commercial salmon industry, due to king salmon conservation concerns, there was an allocation shift of salmon away from the set gillnet sector and to the drift gillnet sector, a shift in the neighborhood of \$10 million of ex-vessel from set netters to drifters. The overall ex-vessel value and hence processor values did not change, but only shifted between gear groups. The disaster declaration for UCI was also based on lost economic potential from cancelled king salmon fishing trips to the sportfishing industry.

From the vantage point of "economic disasters" a reallocation away from the guided sportfishing industry of less than \$5 million on an annual basis would be better than \$15 million. Therefore, KRSA supports Alternative 5 in that it shifts the least amount of poundage away from the guided charter sector to the commercial sector. Although even the shift in allocation proposed in Alternative 5 is significant, KRSA believes it will do the least amount of damage on an annual basis to the guided charter

sector of the Alaskan sportfishing industry. In 3A, adoption of Alternative 5 would not have led to a reduction in the two fish daily bag limit, whereas adoption of Alternative 3 would have. An 8 percent reduction in allocation can be accommodated without severely impacting the guided sportfishing industry, whereas a 25 percent reduction will almost certainly curtail the vitality of the industry for years to come.

SKIPPER AND CREW FISH

KRSA feels that the provision for non-retention of skipper and crew fish does not curtail the viability of the guided sportfishing industry. Guided charter operators are barred from retention of fish while performing guide operations in the freshwaters of the Kenai River drainage and elsewhere in freshwaters of Alaska.

GAF

KRSA does not support GAF as a long-term solution to the problem statement that there is a functional mechanism for compensated reallocation between sectors. KRSA believes GAF is a short-term, temporary solution at best, with need of annual review and the idea that a common pool approach will ultimately supplant its use. Industry opposition to GAF is well-documented elsewhere in the public record.

MANAGEMENT MEASURES

KRSA supports the "2012" approach to develop appropriate annual management measures. It is a necessary and useful replacement of the proposed management matrix, and will allow a much finer tuning of harvest methods and means to the available annual allocation.

COMMON POOL MECHANISM FOR COMPENSATED REALLOCATION

KRSA support of Alternative 5, even though it does reallocate a significant amount of poundage and result in potential "lost" angler days, is based on the idea that eventually an effective mechanism based on a common pool approach for the guided sportfishing industry will be developed and implemented.

KRSA would like to thank the Council for its time and consideration of this matter.

Sincerely,



Ricky Gease, Executive Director
Kenai River Sportfishing Association



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-1(b)

September 25, 2012th

Chair Olson and Members of the Council:

I appreciate the opportunity to comment on 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.

Please accept the attached document as SEAGO's formal written comments on Agenda Item C-1(b) – Final Action on Halibut Catch Sharing Plan.

I, and several SEAGO members, will be in attendance at the October Council to expand upon these comments during the public comment period.

Sincerely,

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

Heath E. Hilyard, Executive Director
SEAGO



POSITION STATEMENT: CATCH SHARING PLAN – allocation, management measures, GAF and other items

Allocation

SEAGO supports the allocation levels contained within Alternative 5.

Unarguably, allocation under the Catch Sharing Plan (CSP) is of the greatest concern to Alaska's charter industry. The concern to our industry is not simply one of parity or equity, but one of a basic ability to effectively prosecute our fishery and for our operators to remain profitable. Unlike our counterparts in the commercial fishing industry, broader economic factors and changes in management measures dramatically affect angler behavior, which in turn affects our harvests and thus our profitability.

We assert that use of logbook data rather than statewide harvest survey (SWHS) data is more accurate and reliable. In moving data sources, Alternative 5 makes adjustments for that change and provides for a 3.5% increase in allocation at lower levels of combined catch limit (CCL).

While this highest level of allocation under Alternative 5 still represents and appreciable reduction in allocation to the 2C charter fleet when compared to the Guideline Harvest Level (GHL), we believe it represents the best opportunity for our fleet to maintain profitability while achieving conservation goals.

It should be noted that EA/RIR of September 4 clearly indicates that any reduction of harvest by the charter sector will result in a gain to the commercial sector (Pg. xxiv – Effect of Alternatives) and that staff has projected this increase to commercial sector will result in an increase of 177,000 lbs. which equates to \$977,000 in revenue under Alternative 5.

Management Measures

SEAGO supports the adoption of the "2012 Approach" for the development of appropriate annual management measures.

Interrelated to the issue of allocation is that of appropriate management measures to constrain harvests while maximizing angler access and mitigating economic harm to the 2C charter sector—a larger allocation allows for greater flexibility in the development of management measures.

In 2011, 2C operators and the Council witnessed the drastic effect of an inappropriate management measure that failed to account for the dynamic of angler effort. In 2011, the 2C charter fleet caught less than 50% (388,000 lbs.) of its GHL allocation. While final season numbers for 2012 have not been

released, preliminary data from the Alaska Department of Fish and Game (ADF&G) indicate that Southeast operators harvested approximately 65% (610,000 lbs.) of their allocation.

While still considerably below our target harvest of 931,000 lbs., SEAGO is encouraged by this notable increase that resulted from the U45/O68 reverse slot-limit recommended by the Charter Management Implementation Committee. Furthermore, we believe that the process undertaken by the Council through the Charter Management Implementation Committee was fruitful. The dialogue between the Council and that committee resulted in a better management measure and a better understanding of our industry. We assert that this process will result in further refinements of annual management measures that will get us continually closer to our target harvests.

As mentioned above, a higher allocation will generally result in greater flexibility in the development of management measures. In our support of the highest level of allocation, our primary desire is increasing flexibility rather than to simply get the most fish available to us. For the foreseeable future, many 2C operators assume that bookings will remain relatively flat in comparison to 2012 and the closer we can get to the management measure for 2010 (1 fish per day of any size) offers the best prospect for recovery for 2C charter operators.

Guided Angler Fish (GAF)

SEAGO requests an annual review provision to be included for Guided Angler Fish. Furthermore we request a statement that it is the Council's intent for GAF to be a temporary measure to accompany the final rule.

SEAGO has not reversed its previous opposition to GAF, however we recognize that it is the Council's intent to take final action on the CSP, including the GAF provision. In that acknowledgement, we have no desire to take an obstructionist approach, but rather to work the Council in the spirit of good faith to improve the aspects of the CSP we believe to be the most problematic.

Operators in both 2C and 3A remain concerned about the practical implications of the GAF provision, in terms of both the financial impacts to their individual businesses and to charter clients generally. All of the 2C operators that SEAGO has spoken with remain strongly opposed to this provision.

In terms of their individual businesses, operators have expressed the following concerns:

1. GAF further exacerbates competitive disadvantage to smaller operators.
2. Within the first several years of the provision being in place, operators will be unable to accurately predict the need for GAF based on client demand. Too little to satisfy client demand will likely result in dissatisfaction from clients, leading to a potential loss of repeat business; Too much and an operator faces an immediate financial loss they are not able to mitigate by carrying over to the following season.
3. Depending on abundance and allocation, GAF may simply not be available or in sufficient quantities for operators to effectively plan from year to year.

4. There are practical implications of size/weight conversion, particularly between years 1 and 2.
5. Charter operators object, on principle, to leasing back quota taken from them through reallocation under CSP. GAF could become more attractive to some operators if it was a purchase rather than lease option.
6. Generally speaking, the charter sector believes that compensated reallocation on an individual basis is not the correct mechanism. A common-pool compensated reallocation mechanism, such as that being developed by the CATCH Project, is a more appropriate vehicle for these transfers.

In terms of the impact to charter clients generally, SEAGO remains concerned about confusion in the marketplace. In previous testimony to the Council, Mr. Ricky Gease of the Kenai Rivers Sportfishing Association (KRSA) aptly referred to this as a situation of the "GAF and GAF nots". Clients who prefer to avail themselves of this option will be forced to find operators with GAF, thus limiting their options for preferred charter operators.

As indicated above, SEAGO acknowledges the Council's intent to adopt CSP with the GAF provision included during the October meeting. We respectfully request the Council include an annual review process for the GAF provision, with that review process beginning in 2015. Further we request that the Council include language in the verbiage of its motion for final action on CSP that it is the Council's Intent that GAF be a temporary mechanism until a more suitable program can be implemented as a long-term solution.

Other Issues – Common Pool Plan

SEAGO encourages the Council to look to a common-pool compensated reallocation plan as a long-term solution.

As alluded to in the above discussion on GAF, SEAGO continues to support a sector-based compensated reallocation mechanism through the use of a common-pool approach. The Catch Accountability Through Compensated Halibut (CATCH) project, a joint endeavor of the Alaska Charter Association (ACA) and SEAGO, is completing a draft plan for the Council's consideration.

Recognizing that this draft plan is not completed for staff analysis prior to the October meeting and final action on CSP, SEAGO understands that CSP should not be further delayed in anticipation of a formal proposal from CATCH.

SEAGO respectfully requests the Council tasking staff to begin review and analysis of a CATCH proposal, once available, at the earliest opportunity.

CHINOOK SHORES

WATERFRONT FISHING RESORT
PO BOX 6555 - KETCHIKAN, AK 99901 - (907) 225-6700

September 25, 2012

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

Re: Agenda Item C1b, Halibut CSP

Dear Chairman Olson,

I'm a 25 year resident of Alaska and I own and operate a fishing lodge in Ketchikan. I have well over a million dollars invested in my boats and facilities. On average, 320 non-resident individuals travel to Ketchikan and stay in my lodge each season pumping hundreds of thousands of dollars into our community. Amidst the halibut allocation turmoil and dwindling bag limits for guided anglers over the last decade, my occupancy has remained stable.

But here is the problem: My business caters to both guided and self-guided fishermen. This year guided trips are down and self guided trips are up. As a businessman I could stand to gain from this situation; however, I'm a charter captain and I enjoy taking people halibut fishing. Unfortunately the joy of catching halibut on a charter vessel is dwindling along with my clients due to the discrimination between guided and unguided anglers. Another reason I prefer to guide my clients for halibut is largely due to safety. It is much safer for clients to charter a halibut trip with a USCG captain verses taking a smaller unguided vessel off shore to find halibut on their own. A sudden unforecasted change in the weather or a mechanical problem with the boat can put unguided anglers in harms way. Also - many of my clients are simply unable to take their own vessel out fishing due to their age and/or ability to safely run a boat and it is unfortunate that they are being penalized with a smaller bag limit due to their inabilities. I would like to see all sport fishermen fall under one single set of rules. For example: One halibut per day any size for everyone.

If there is truly a problem with the resource why are only selected groups targeted for conservation? Why are the unguided sportsmen left unchecked? Why are trawlers still allowed to harvest and return 10 million pounds of dead halibut bycatch to the ocean each year (more individual fish than all directed halibut fisheries combined) while commercial fishermen and charter fishermen are experiencing 200% - 600% reductions?

CSP Deficiencies

ALLOCATION: In Options 1 and 2 (Alternative 5) there are jinks in allocation whereas charter halibut allocation actually drops with abundance at certain levels. If the CSP is intended to allocate fish in a model that floats with abundance this is counterintuitive. Also, Area 3A allocation is well below the current GHL, reallocating fish to the commercial sector.

With the flat lining option applied the allocation model flatlines the jinks however it still does not increase with abundance and therefore still reallocates pounds from the sport sector to commercial during this segment of the model.

I am in favor of the CSP allocation model submitted by the ACA with the log book adjustments. This more closely resembles the existing GHL and truly floats with abundance.

September 25, 2012

GUIDED ANGLER FISH: I am strongly opposed to the GAF program. Under this program I will never have control of my business and will always be subject to the whim of commercial operators. The GAF program advocates absent ownership, and in Area 2C there simply is not enough halibut available for lease. This program also favors only the wealthiest operators as they are the only ones with the required funds to lease pounds.

I am in favor of a system such as the CATCH plan currently being developed that will allow me to actually own my business – a much better option of everyone.

SECTOR DISCRIMINATION: The CSP does not address the growing unguided sector and only seeks to further restrict the charter catch. This makes no sense due to the recent harvest spill over to the unguided sector. A better CSP would include all user groups and would incorporate a functional transfer mechanism such as the CATCH plan.

Summary

Areas 2C and 3A harvests are now within the GHLL. Rushing to approve a catch plan with so many deficiencies and unfavorable programs will only keep us in this ongoing cycle of fighting for allocation and arguing amongst sector groups. This CSP and its options as written do not solve the problems at hand. We need the following issues addressed:

1. An allocation model resembling the existing GHLL which actually floats with abundance.
2. A transfer mechanism (such as the CATCH plan) allowing the actual purchase (not lease) of pounds from the commercial to the sport sector and vice versa.
3. A plan that addresses allocation to all user groups (unguided and guided) so that we don't have to do this all over again in the coming years.

Thank you,

Jeff Wedekind

Eric Olson, Chairman

North Pacific Fisheries Management Council

605 W. 4th Ave., Suite 306

Anchorage, Ak 99501-2252

Re: Agenda Item C1b, Halibut CSP

September 24, 2012

Dear Chairman Olson,

Thank you for the opportunity to comment on the Halibut "Catch Sharing Plan" currently before the North Council. I have been involved in the halibut charter industry since 1992. I began my own business in 1997 and have invested several hundred thousand dollars to maintain a safe quality fishing platform for recreational anglers harvesting "their" halibut to feed their families. Halibut chartering has never been a lucrative business. Over the past several years, a number of conditions including an unstable economy, exponential increases in operating costs, a rapid and drastic decline in the quality of the halibut fishery, the volatile and onerous nature of halibut fishing rulemaking, and the overt and public hostility of longline fishermen toward recreational anglers have turned a minimal profit margin into a losing business venture across the board. I have personally seen a 30-35% decline from my traditional average customer demand.

The CSP supplemental analysis establishes that commercial fisherman have LOST money over the past six years while charter operators have MADE money; what I've observed in my community of Homer is 100% different from the illusion this analysis presents. Over the past six years, I've seen operating costs increase exponentially and while charter fees have increased, it barely covers those increased costs. I've seen 40% of the charter fleet be put out of business, many long term operators give up and quit chartering, and countless young families go bankrupt and move out of state. Most charter operators are struggling to "just get by" and make their boat payments. By contrast, the longline fleet has enjoyed great prosperity. There have been a large number of brand new longline vessels in our harbor, 3000 sq. ft. houses going up, brand new trucks, four wheeler, and snowmachines, all of which are owned by commercial fishermen. During dockside conversations our longliners are ecstatic with the prosperity they are experiencing. They are making fewer trips, fishing closer to home, dramatically reducing their expenses and realizing exponentially increased profits.

The Alaska Charter Association has been participating fully in the North Council Process for over eight years. The ACA has only ever asked for two things of the Council: A "fair and equitable" allocation

and decision making based on science instead of political rhetoric. We have defined issues and problems that the Council has either not identified or not thought through thoroughly and offered simple viable solutions. Most recently, the ACA has illustrated that the current version of the CSP still reallocates halibut away from the charter sector relative to the GHL allocation. Even though NOAA has directed the Council and the ACA has offered simple solutions to more closely align the allocation, This Council has chosen arbitrary options which are less than "fair and equitable". I strongly urge the Council to carefully consider the testimony which the ACA has again submitted.

The Council analysis fails to adequately evaluate the negative economic impacts of the GAF component to the charter operator. It is unreasonable to speculate the guided recreational anglers will be willing to pay to lease back their halibut which has been reallocated to the longline sector. Without exception, 100% of my long term clientele has stated they will not return to Alaska to spend their money. Many of these clients have witnessed the sheer decimation of the halibut fishery since the advent of the IFQ program and will not pay to "get back" their fish which has been given away again. The ACA has clearly defined nearly a full page of reasons that GAF are problematic.

The Council analysis also fails to adequately address the negative economic impacts of a ban on skipper/crew fish or to adequately provide a rationale for doing so. The costs for charter operators to make "special trips" to catch personal halibut are enormous. This means lost days of revenue and several hundred dollars in fuel. My annual fuel bill averages about \$80,000. It is extremely unfair and inequitable to not allow me or my crew the opportunity to feed our families while we are "on the grounds".

The vast majority of crew fish I bring home are well under 32 inches. Neither the Council nor the IPHC consider sub-32 inch fish to even be a biologically viable fish. It is unfair and inappropriate to ban me and my crew from harvesting fish that technically don't even exist. I find it extremely disconcerting that I can frequently and regularly observe hundreds of pounds of sub-legal/illegal halibut being snuck away from commercial boats and yet I may not be allowed to feed my own family.

It has been almost 20 years since Linda Behnken (as a member of this Council), ALFA, and the NPFMC began submitting proposals to limit the harvest of guided recreational halibut by attacking the charter sector with unfounded rhetoric. For all these years, the intent of Council actions has been to reallocate halibut away from the charter sector to the longline sector in order to create a de facto allocation which is insufficient to meet the needs of guided recreational anglers. The common theme within all the ALFA/Halibut Coalition (North Council) Plans has been some mechanism, for the charter operator or the guided recreational anglers, to purchase or lease "back" their halibut which will have been given away to the longline sector. Here we are again.....same song third verse.

For nearly 20 years, this Council has based it's rational and decision making on endless rhetoric, misinformation, baseless illusions, and outright lies which Alfa, and the Halibut Coalition have force fed this body. The Council analyses have continued to be incomplete or founded on assumptions without merit. Since 1992 this Council has been unable to evaluate the negative economic impacts to the charter sector due to a "lack of data". How is it possible then for this Council to have a historical basis to

determine that the charter sector is prosperous? Furthermore, If the Council is able to make such conclusions, then why is the Council unable to present valid analyses of the negative economic impacts to the charter sector as a result of reallocating halibut to the longline sector, requiring the guided recreational angler to "lease back his/her" halibut, or impacts to the operator himself due to a ban on crew fish.

Although this Council has made effort and movement toward making the CSP closer to a "fair and equitable" solution, you are not there yet. Again, I strongly urge you to carefully consider the simple and viable solutions presented to you by the Alaska Charter Association. Charter harvests in both area 2C and 3A are well under the GHL. Charter demand overall is still strongly declining. A great deal of energy, and resources are being put forth to bring about a first-ever, ground-breaking compensated reallocation pool plan as envisioned by the CATCH Project.

Given the current environment of compromise, reason and hope, brought about by CATCH, why the rush to final action on a plan with so many outstanding issues, such as the "jinks" in the CSP allocation matrix, an unworkable, and unpopular GAF provision, a less than perfect sector accountability problem, and the exclusion of the unguided sector, to mention just a few.

And, given the historic and current composition of the Council, and given the flaws in the proposed CSP, it appears certain that the CSP if adopted will only guarantee that the halibut war will continue for decades more into the future. This is not a Final Solution. On the contrary, it will become yet another source of ongoing contention resulting in more wasted time and energy by all concerned.

Please take guidance from the ACA, take time to properly and fairly fix the flaws, and Give the CATCH Project a chance to develop. It could well resolve this decades long battle once and for all, and, by design, quite possibly with very little involvement by the Council.

Respectfully,

Capt. Bryan Bondioli

Captain B's Alaskan C's Adventures

P.O. Box 66

Homer, Ak. 99603+

September 25, 2012

Chairman Eric Olson
605 West 4th Avenue Ste. 306
Anchorage, AK 99510

Dear Chairman Olson and Members of the Council,

My family and I earn our living fishing for halibut, sablefish and salmon on our 40 foot boat. We fish in Areas 2C and 3A. Both my wife and I have fished since the early 1980s, but because we primarily deck-handed during the IFQ qualifying years, we purchased 95% of the quota we currently hold. After the Council adopted the CSP in 2008, we purchased two additional blocks of quota expecting the reallocation had stopped.

I oppose any further reallocation of halibut from the commercial to the charter sector. I support the allocations in Alternative 2. We have watched our family's quota reduced by 76% in area 2C over the past six year while the charter quota was reduced only 35%. Our quota is now worth far less than what we invested to purchase it and our income from halibut fishing has dropped by two thirds. Based on the economic analysis for this issue, the charter sector has increased revenue during these low abundance years. What seems to matter to the charter fleet is being able to design the management measure for their fishery, which the newly streamlined CSP allows them to do. What matters to the commercial fleet and my family is every pound of halibut. If the Council decides to reallocate halibut at this meeting, any reallocation should move halibut back to the commercial fleet, especially during times of low abundance.

Because halibut growth rates have slowed so dramatically, low abundance could be the status quo for many years. Particularly in Southeast, where so much quota has been reapportioned from Area 2C to Area 3B, fishermen will likely be living in the low abundance scenario for the foreseeable future. Please keep that in mind when you make your allocation decision, because people my age who have purchased quota may never fish under a combined charter commercial catch greater than 5 million pounds in 2C, and may never recover the investments we were forced to make to participate in the Council approved halibut IFQ fishery.

I support the GAF provisions and the streamlined process for setting charter harvest control measures that is outlined in Alternative 3, but I do not support the Alternative 3 allocation. Charter operators should not be allocated more halibut because the ADFG data sets do not match. Please retain the allocations in Alternative 2, streamline the charter management process, and implement the CSP.

Sincerely,

Kent Barkhau

From: Marty Remund <remundmarty@yahoo.com>

Date: 9/25/2012 4:51 PM

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

Chairman Eric Olson, NPFMC

I am Marty Remund I'm a 2-c halibut longliner. I invested in 2/3 of the halibut quota I have and have seen it drop 75% in the last 6 years! My expectations were that management wouldn't reallocate my investments to the charter fleet. We supply halibut to the public all over the world via restaurants grocery stores and fish markets. I support the 2008 recommendation for the CSP, (longline/charter allocation split). I support the GAF provision that allows charter operators to lease quota if they want more. Charter operators should invest if they want more fish like we do. I'm frustrated that a final recommendation never makes it through the gauntlet to a final rule and law! This has been a 20 year allocation battle fiasco to say the least! It has caused a lot of stress and instability for halibut longliners.

Sincerely, Marty Remund P.O. box 8147 Port Alexander,
AK.99836.

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Subject: C1b Halibut Catch Sharing Plan

From: "Capt. Greg Sutter" <captgreg@alaska.net>

Date: 9/25/2012 4:58 PM

To: <npfmc.comments@noaa.gov>

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

Re: Agenda item: C1b/Halibut Catch Sharing Plan (CSP)

Dear Chairman Olson,

When I ask my clients about what they think about the proposed CSP, most of them by respond by asking: why is the Federal government taking fish away from them? Then they ask: what is the state of Alaska, and our Governor, doing to preserve anglers' access to the resource? Where is the socio-economic study results on this topic and how is conservation being served?

The proposed CSP is a re-distribution of the resource from charter anglers to the commercial halibut quota share holder. Charter anglers are opposed to having their allocation cut and opposed to leasing fish from the commercial halibut quota share holder or anyone else. They feel it is a public resource and needs to be managed as such, with substantial reductions in commercial bycatch and wastage. They have expressed that they want to see 100% observer or electronic monitoring of the commercial fleet. Charter anglers' fish clean with very little or no wastage, and their catch (allocation) should not be re-distributed to the Halibut Quota Share holder. They have made that very clear to me. As a charter fishing operator, I agree with my clients. Their concerns are my concerns.

I am also concerned that this Council will rush to action without resolving perplexing problems contained in the complicated proposed CSP. Much documentation has been submitted highlighting legal and practical concerns. The proposed CSP creates more problems than it resolves, raises the cost of fishing to my clients and our federal and our state government, and to commercial fishermen. Why are we increasing the cost of fishing, administration and enforcement? What is the conservation justification for cutting anglers' allocation and what is the cost of this proposed plan to all user groups?

My clients and I will not support this plan until the proposed adjustments to the CSP, made by the Alaska Charter Association, are adopted by this Council.

Thank you for taking your time to do the right thing and your consideration!

Sincerely yours,
Greg Sutter

Capt. Greg's Charters
F/V "Tomahawk II"
PO Box 2202
Homer, Ak. 99603
(907) 235-4756
(907) 399-4856 cell
(877) 235-4756 toll free
www.CAPTGREG.com

Dear Members of the Council,

My wife and I own and operate a small combination longline/troller that we fish with our two boys, ages 9 and 11. Our fishing time is family time. We often troll for three to four days, then make a longline set to catch what little halibut we have left in Areas 2C and 3A.

Space is limited on our boat, so we have watched restructuring of the observer program with some concern. I attended the Sitka outreach meetings and was reassured by NMFS that electronic monitoring would be developed by NOAA, working in partnership with ALFA, as an alternative to human observers for the small fixed gear fleet. I am happy to fill out a logbook, take a camera or data logger, and provide NMFS with all the at-sea data NOAA can use for management purposes. But we cannot safely fit another person on our boat. We don't have an extra bunk and we cannot provide any privacy. If we had to carry an observer, we would not be able to fish combination trips, which will further reduce the profitability of our fishing business. The deployment plan NMFS has proposed does not work for the small boat fleet, that is why ALFA worked hard with NMFS to make EM cost effective. Please direct NOAA not to assign observers to the small boat fleet until they can provide EM as an alternative to meeting at sea monitoring requirements.

The priority of the observer program should be better coverage on PSC limited fisheries. The Council should be concerned about halibut, salmon and crab bycatch. The small amount of halibut and groundfish taken by the small boat fleet is no threat to the resource. Please take the time to develop a monitoring program that works for Alaska's community based small boat fleet.

Sincerely,

Kent Barkhau

Subject: Halibut allocation for 2C
From: Markdrage816 <markdrage816@yahoo.com>
Date: 9/25/2012 6:25 PM
To: npfmc.comments@noaa.gov

I am an IFQ holder in 2C. I have a loan for \$100,000. At 7.5% interest. My pounds have been reduced by 70%!

Let the charters buy in like I had to do. To GIVE them more quota when I had to buy is unfair. Please let them purchase but don't give anymore. I am being put out of business!

Mark Drage
P o box 1826
Petersburg AK. 99833
907-518-1209

Sent via the Samsung Galaxy S™ II Skyrocket™, an AT&T 4G LTE smartphone.

Subject: halibut reallocation issue

From: Ellen Hannan <ehannan32@gmail.com>

Date: 9/25/2012 10:25 PM

To: npfmc.comments@noaa.gov

Date: Sept. 25, 2012

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Mr. Olson,

Re: C-1 Halibut Catch Sharing Plan (CSP)

My name is Brian Castle and I've grown up and lived in Southeast Alaska for 53 years. I've fished halibut every year of my life since I was in junior high school. My wife and I bought 2 more halibut blocks after I was given the original block when the IFQ program was started. At one time we had over 23,000 lbs. to catch, but this year it has been wittled down to around 6,000. That is worth less than half at today's dock prices that it was worth when I had the 23000. I had to invest in the halibut system and I can't imagine the council would take another lb. from the commercial sector and reallocate it to the charter group. They can buy it like the commercial guys have had to.

I SUPPORT the catch sharing plan percentage allocations adopted in 2008. I urge the Council to recommit to these allocations, streamline the CSP charter management system, and implement the CSP.

The 2008 CSP allocations were based on historic and current harvest ratios between the charter and longline sectors and fairly share the resource between these two sectors. The allocations are fair and equitable. The allocations protect historic consumer access, the longline fishery, and fishery dependent communities. The 2008 CSP allocations also provide a reasonable level of access for guided anglers at all levels of halibut abundance. The charter fleet was gifted an allocation 25% above their actual harvest on two occasions and should not secure a higher allocation through political interference.

Longline fishermen bring the fish to the public; charter operators take the public to the fish—but orders of magnitude more "public" are served by the longline industry. Even at these low levels of abundance, longline fishermen in these two areas annually provide access—through high quality, healthy meals—to the halibut resource for 7-9 million Americans plus another 2 million non-Americans through export. The Area 2C and 3A charter industry, on the other hand, provides an expensive recreational opportunity to approximately 230,000 clients per year. In short, the longline fishery provides 40 times more Americans access to the halibut resource and provides national economic benefit through export.

When I purchased quota, I did so with the expectation that the NPFMC would not reallocate those investments to another commercial group. My family is dependent on income from the halibut longline fishery and reallocation to the charter sector hurts both my family and my community. The CSP supplemental analysis establishes that longline fishermen have LOST money over the past six years while charter operators have MADE money at these low levels of abundance. The charter fleet does

not need more halibut at the expense of longline fishermen and the communities that depend on them. If clients want more halibut, charter operators can lease quota through the Guided Angler Fish (GAF) provision. Why shouldn't they have to invest if they want more quota?? I have.

I support changes to the CSP that allow the Council to develop annual charter management measures for adoption by the International Pacific Halibut Commission. I support the GAF provision. What I cannot support is yet another reallocation to the charter operators of the halibut quota I worked hard to purchase. The longline industry and the American public deserve better than that from the Council.

Thank you for the opportunity to comment.

Sincerely,

Name: Brian Castle and Ellen Hannan

Address: Box 243, Craig, Ak. 99921 (phone- 907-826-3489)