

MEMORANDUM

TO: Council and AP Members
FROM: Chris Oliver *Chris*
Executive Director
DATE: November 30, 2006
SUBJECT: Charter Halibut Management

ESTIMATED TIME
14 HOURS
All C-1 items

ACTION REQUIRED

(f) Review discussion paper on allocations/shares and committee report, and take action as necessary.

BACKGROUND

In June 2006, the Council adopted three draft alternatives for a “permanent solution” to allocate halibut between the charter and commercial sectors: 1) Status quo; 2) Allocation to the charter sector; and 3) Quota share program (Item D-1(f)(1)). The Council tasked staff with developing a discussion paper on the suite of alternatives, elements, and options for review at this meeting. The discussion paper is attached as Item D-1(f)(2)Part 1, and was mailed to you in November.

In this discussion paper, staff has proposed a new structure for the suite of alternatives. This restructuring is intended solely to aid the Council in identifying distinct management actions for analysis and to aid the public in understanding possible outcomes.

The proposed (moratorium) limited entry program would be the first action taken by the Council. This decision is scheduled for April 2007 and is the subject of a separate agenda item.

The second analysis would include Action 2 and 3. Proposed Action 2 would set an allocation between the charter and commercial sectors. Identifying the allocation decision as a unique action reduces confusion by streamlining the alternatives to contain only one set of allocation options. Dropping an option to replace an “interim” permit system (in the first analysis) with a “permanent” limited entry permit system (in the second analysis) significantly reduces redundancy.

**Staff Recommendations for Structuring
Charter Halibut Harvest Alternatives**

First Analysis – final action in April 2007

Action 1. (Moratorium) Limited Entry
Alt. 1 No Action
Alt. 2 Limited Entry Permit Program
Option. Community provisions

Second Analysis – final action to be announced

Action 2. Allocation between commercial/charter sectors*
Alt. 1 No Action
Alt. 2 Allocation between sectors
and

Action 3. Share-Based Systems

Alt. 1 No Action
Alt. 2 Limited Entry Permit Endorsements (rods/trips or angler days)
Option. Community shares
Alt. 3 QS Program
Option. Community shares

Proposed Action 3 could modify the limited entry program by: 1) adding permit endorsements to control effort, based on past history (Alternative 2); or 2) integrating the charter sector into the commercial quota share (QS) program by issuing transferable QS and allowing the market to set allocations between the sectors (Alternative 3). Staff is also requesting clarification on proposed community options under Actions 2 and 3 in the second analysis.

A second discussion paper (Item D-1(f)(2)Part 2), addresses six discussion points associated with Actions 2 and 3 that staff and Stakeholder Committee members identified as important and potentially complicated. These include:

- 1) the availability and quality of charter halibut data;
- 2) specific sector allocation formulas (Alternative 2 Issue 1 (as identified in the June 2006 Council motion));
- 3) sub-area allocations (Alternative 3 Issue 1);
- 4) finance mechanisms for a compensated transfer;
- 5) permit classes (Alternative 2 Issue 4); and
- 6) share-based permit systems (Alternative 2 Issue 4).

Additional streamlining of the suite of alternatives adopted for analysis at this meeting may be necessary at a future meeting. Staff has already identified two issues for additional Council refinement: 1) mechanisms to increase charter sector harvest under Action 2 should be simplified and/or clarified; and 2) endorsements to CQE-issued permits under Action 3, Alternative 2 should be developed, since gifted permits will not have associated catch history.

The Stakeholder Committee accepted staff recommendations to reorganize and streamline the alternatives and options and added a significant recommendation to streamline permit endorsement options (Item D-1(f)(3)).

**NORTH PACIFIC COUNCIL
PERMANENT SOLUTION ALTERNATIVES AND OPTIONS
JUNE 2006**

ALTERNATIVE 1. NO ACTION

ALTERNATIVE 2. ALLOCATION TO THE CHARTER HALIBUT SECTOR

Issue 1. Allocation

Option 1. Fixed Percentage of combined commercial/charter catch limit:

	Area 2C	Area 3A	formula
a.	16.37%	15.92%	125% of average harvest of 2000-2004, translated to percentage
b.	13.05%	14.11%	equal to the 1995-99 GHL, translated to percentage
c.	14.7%	12.9%	percentage of combined 2004 commercial/charter catch
d.	12.1%	12.9%	convert current GHL into percentage based on 2004

Option 2. Fixed Pounds

	Area 2C	Area 3A	formula
a.	1.693 Milb	4.011 Milb	update GHL to 2000-2004
b.	1.432 Milb	3.650 Milb	equal to the 1995-1999 GHL
	Suboption 1.		Without step up/down
	Suboption 2.		With stair step up/down provisions if changed by 5, 10, or 15% of the base years of the initial allocation

Suboption. Suballocate between subareas. Develop local area management plans (LAMPs)
(placeholder for State of Alaska recommendations)

Issue 2. Overage/Underage

- Option 1. apply overages/underages to the following year's allocations by sector
- Option 2. allow overages/underages to be transferred across sectors
- Option 3. 3 or 5 year rolling average of catch to determine if overage/underage occurred in latest year
- Option 4. \pm 5 or 10% overage/underage results in no management response and >5 or 10% overage/underage leads to change in measures

Issue 3. Mechanisms to increase charter sector harvest with compensation to the commercial sector; increased fishing opportunity to recreational anglers as demand grows; opportunity for charter sector growth in areas that are currently underdeveloped; and maintain stability in coastal communities.

- Option 1. Allow the state to hold commercial QS/IFQ and transfer the poundage/percentage to the charter sector
 - Suboption 1. By purchase of commercial quota share (permanent)
 - Suboption 2. By lease of commercial IFQs (annual)

- Option 2. Allow use of commercial QS in the charter sector through permanent transfer (converted to fish) by purchase or conversion.

Eligibility

- Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut QS in the charter fishery
- Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut QS in the charter fishery

Permanent Transferability (Sale)

- Commercial QS is fully transferable across sectors and retains original class designations
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.
- Split blocks retain original block designations
- Allow transfer of any (A, B, C, or D) vessel class QS for use in charter sector
- Charter business may not hold more than 1 block of Class D QS \geq sweep-up level

Option 3. Allow use of commercial IFQ in the charter sector through temporary leasing (converted to fish)

- < 10 percent of a commercial QS holder's IFQ may be annually leased to charter sector between private individuals
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.

Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut IFQ in the charter fishery

Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut IFQ in the charter fishery

Option 4. Allow charter halibut limited entry permit holders to convert their permits into increased allocation at initial issuance

Suboption 1. Each charter halibut permit is equal to percentage of charter sector allocation based on total number of charter permits (equal shares)

Suboption 2. Each charter halibut permit is equal to percentage of charter sector allocation based on class or other designation of limited entry permit

Issue 4. Mechanisms to finance compensated reallocation to the current charter sector to allow for growth

Option 1. State charter stamp

Option 2. Allow private entities to purchase commercial QS/IFQ and convert to charter allocation; lease back unused allocation at end of year (part of KACO plan)

Option 3. Business Improvement District (tax on trips dedicated to certain purpose)

Option 4. Funds from compensated transfer of unused charter allocation back to commercial sector

Option 5. Allow State to hold IFQs in trust through State bonds (similar to bonds issued recently for construction of State hatchery)

Option 6. Federal funding/grants/stamp to fund entities to purchase QS and convert to charter allocation

Issue 5. LIMITED ENTRY PROGRAM¹

Elements of the program

1. **Permits²** may be held by U.S. citizens or U.S. businesses with 75 percent U.S. ownership of the business³. Business may receive multiple permits associated with vessels owned by a business. Currently licensed vessels may be "grandfathered" above proposed limits until any change in ownership.
2. **Permits will have separate designations for Area 2C and Area 3A.**
3. **Permit Endorsement**

<u>6 clients</u>	<u>highest number on any trip in 2004 or 2005</u>
uninspected (6-packs) vessels	inspected vessels (but not less than 4)
new construction (uninspected or inspected vessels)	uninspected >100 gross tons ("Super-T")
constructive loss ⁴	constructive loss ¹⁰
4. **Permit would be issued to registered guide business operator**
5. **Permit applicant** would be required to sign affidavit attesting that all legal requirements were met.⁵
6. **Transfers of permits (permanent)** would be allowed

¹ Military (Morale, Welfare, and Recreational) boats are exempted from QS program. They could be issued limited entry exemption permits

² Through initial issuance and transfers

³ Military (Morale, Welfare, and Recreational) boats are exempted from limited entry, but harvests still count against GHF

⁴ limited to the endorsement associated with lost vessel

⁵ The only tangible evidence is the ADF&G logbook, which requires meeting all State legal requirements

- 7. **Permits** may be stacked up to use caps^{6,7}
- 8. **Permits** must be renewed annually⁸
- 9. **Evidence of participation** - any ADF&G logbook entry with recorded bottomfish statistical area, rods, or boat hours

10. **Permit class**

Option 1. No permit classes

Option 2. Permit class

Class A. Immediately transferable if more than or equal to a) 10; b) 30; or c) 50 days each year

Class B. Non-transferable if less than or equal to preferred alternative above [a) 10; b) 30; or c) 50 days] (except to underdeveloped communities under Issue 2, Option 3, if no permit class is designated)

Suboption. By port/subarea (placeholder for State of Alaska)

Option 3. Permit class based on 1998 - 2005 logbook records of total groundfish effort days per season

Suboption 1. Average of the 3 best years.

Suboption 2. i. Best year and

ii. Must have a minimum of 10 annual trips for 3A, and minimum of 6 annual trips for 2C (eliminates Area 3A Class H and Area 2C Class G logbooks)

	Area 2C			Area 3A	
	Trips	Avg. # Business		Trips	Avg. # Businesses
Class G	<6	81	Class H	<10	82
Class F	6 - 10	76	Class G	10 - 25	91
Class E	11 - 25	51	Class F	26 - 35	42
Class D	26 - 35	35	Class E	36 - 45	36
Class C	36 - 45	28	Class D	46 - 55	32
Class B	46 - 55	21	Class C	56 - 65	29
Class A	56 - 65 ceiling	14	Class B	66 - 75	28
Unclassified	> 66 trips	71	Class A	76 - 85 ceiling	25
			Unclassified	> 86 trips	67

Option 4. Rod permit endorsement

Sub-option 1. equal to the maximum number of rods fished in any one day on the vessel.

Sub-option 2. equal to best year of 1998-2005 for total number of client rods fished divided by effort days in the chosen season to determine the rod endorsement.

Option 5. Angler-days (= 1 client fishing bottomfish/halibut in 1 day)

Initial issuance - award number of angler day units from ADF&G logbooks which correspond to:

Suboption 1. Total angler-days during 1998-2005

Suboption 2. Average angler-days during best 3 years from 1998 - 2005

Suboption 3. Total angler-days during best 3 years from 1998 - 2005

Transfers

Suboption 1. Angler days not transferable

Suboption 2. Angler days fully transferable:

1. Permanent: must go through NMFS (RAM division)

2. In-season transfers: allowed between charter businesses

11. **Permit Leases** (in-season only; reverts to permit holder at beginning of next season)

Option 1. not allowed, except for "unavoidable circumstance"

Option 2. allowed, limited to use cap

⁶ a business can use, for example, two 6-packs license endorsements on one "Super-T" vessel

⁷ Clarification is requested as to whether a permit that is stacked is always stacked with the other permit or whether the permit must continue to denote its original endorsement

⁸ Permits could not be renewed if allowed to lapse (due to holder's inaction to renew or because minimum activity was not met)

12. Rod endorsement leases

Option 1. Allow transfers, limited to rod endorsement caps and within permit class (if selected under Issue 3, Option 4)

Option 2. Allow unlimited transfers

Suboption. Substitute angler day permits for rods in above options

13. Vessel replacement and upgrade (can switch between permit classes)

a. inspected vessels

b. uninspected vessels

Option 1. Exclude upgrades of uninspected 12-packs over 100 gross t (“Super-T” (passenger for hire))

Option 2. Grandfather uninspected 12-packs over 100 gross t

14. Vessel use caps, individually and collectively, with grandfather⁹ provision

uninspected (limited to 6 clients) :

Option 1. 1 permit

Option 2. 5 permits

Option 3. 10 permits

inspected and uninspected 12-packs > 100 gross t:

Option 1. 1 permit

Option 2. 2 permits

Option 3. 3 permits

15. Permit use caps, individually and collectively, with grandfather¹ provision

uninspected (limited to 6 clients) :

Option 1. 10 permit

Option 2. 20 permits

Option 3. 30 permits

inspected and uninspected 12-packs > 100 gross t:

Option 1. 3 permit

Option 2. 6 permits

Option 3. 9 permits

16. Communities

Option 1. For Areas 2C and 3A communities previously identified under Amendment 66, allow a community represented by a CQE to purchase between 1-10 limited entry permits per community through the CQE.

Option 2. A CQE representing a community, which has < 10 active¹⁰ charter businesses with their primary place of business in the community, may request a moratorium permit on behalf of a community resident.

Area 2C – use cap of 3 permits per qualified community

Area 3A – use cap of 5 permits per qualified community

Permits would have limited duration of 5 years after issuance of permit for use by any one individual.

Permits would be issued (10, 20, or 30) trips in Area 2C and (20, 40, or 60) trips in Area 3A

Suboption. Exclude communities from GOA FMP Amendment 66 list using the following criteria:

1. within 20, 40, 60, 80 nmi of major charter port or
2. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing
3. 1-5 number of charter (any species) businesses active in a community:

⁹ A business whose permit is endorsed in excess of the permit endorsement maintains that exemption for those that remain in its control after others may be sold, but those sold vessels lose that grandfather status in perpetuity. Grandfathered vessels that are sold in total when a business owner sells his entire business/fleet maintain that grandfathered status.

¹⁰ “Active” is defined as 20 or more charter bottomfish trips per year

ALTERNATIVE 3. INCLUDE THE CHARTER SECTOR IN THE HALIBUT IFQ PROGRAM

Issue 1. Initial QS would be: 13.05% in Area 2C and 14.11% in Area 3A of a combined charter and commercial quota

Option. Suballocate between subareas. Develop local area management plans (LAMPs)
(placeholder for State of Alaska recommendations)

Issue 2. QS recipients - Initial allocation of QS would be issued to U.S. citizens or to U.S. businesses with 75 percent U.S. ownership of the business¹¹.

Issue 3. Qualification Criteria

Participation in the charter halibut fishery by a business during any of the years 1998 – 2005 AND active participant in 2005 (or most recent year, depending on when analysis commences). Require that permit applicant signs affidavit attesting that all legal requirements were met.¹²

Issue 4. Initial Distribution of QS:

Option 1. Individual allocations shall be divided between two “pools” of recipients. The intent is that once the quota shares are determined for the recipients in “Pool 1” (1998 through 2001 “Pool 1”) those shares are proportionately applied to the initial allocation amount for each area. The remainder of the allocation goes into “Pool 2” for recent participants.

Pool 1 (“Seniority”): Businesses qualified with 1998 through 2001 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individual business owners would be issued QS based on their average effort reported in the ADF&G logbook for 1998 through 2001 for pool 1 (exclude years when not active (do not average 0 years))

Pool 2 (“Recency”): Active businesses (submitted at least one logbook that reported groundfish fishing days) between 2002 and 2005 AND whose business participated in 2005 AND met the legal qualifying criteria.

Suboption 1. A recipient receives 25% of one potential share of this pool for each year of participation during 2002-2005 (four years). For example, a business with participation in all four years would receive a full share (100%). A business with participation in three years would receive 75% of a full share, etc.

Suboption 2. Use client/rod days for days fished to reward client effort (6 client rod days v 1 day for the same fishing trip). (Rods(or number of clients logged in, if rods not filled out), (A year with no effort counts as “0”) Skipper fish counts toward denominator, but not for numerator for QS and not against IFQs) This might need more explanation if left in without further details or use as a note for yourself on our intent.

Option 2. Businesses qualified with 1998 through 2005 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individuals will pick their best three years during 1998 and 2005 (include “0” for years less than 3) and average their total number of client/rod days for those three years. (groundfish, where halibut not available)

Issue 5. Transfer of QS:

Permanent QS transfers

1. Initially issued QS to the charter sector is fully transferable within the charter sector.
2. QS from the commercial sector purchased by charter operators is fully transferable (two-way) across sectors and retains original designations.
3. QS issued to charter sector is non-transferable to the commercial sector
4. IFQs used in charter sector may/not be leased within the sector
5. IFQs from the commercial sector transferred for use in the charter sector could be leased to either sector

¹¹ Military (Morale, Welfare, and Recreational) boats are exempted from QS program. They could be issued QS program exemption permits

¹² The only tangible evidence is the ADF&G logbook, which requires meeting State legal requirements

Temporary transfers (IN-SEASON IFQ lease):

1. [0, 20, 40, 60, 80, 100%] of a charter operators annual IFQ is leasable within the charter sector for no more than 2 out of 5 years of the program.
2. Leasing is defined as the use of IFQ on a charter vessel on which the owner of the QS has less than a 50% ownership interest.
3. a maximum of 30% of a charter operator's annual IFQ may be leased; up to 10% may be leased to commercial sector after August 15; up to 30% may be leased to charter sector. (allows mop-up by either sector)

Block restrictions - allow splitting of commercial blocks to transfer a smaller piece to the charter sector - split blocks retain original designations.

Vessel class restrictions - from A, B, C, and/or D commercial vessel category sizes to charter sector, except that no charter business may hold more than 1 "D" category block equal to or above the sweep-up level.

Issue 6. To receive halibut QS and IFQ by transfer:

For the charter sector, must be an initial charter issuee or sign affidavit attesting that all legal requirements were met to participate in the charter fishery.

For the commercial sector, must have a commercial transfer eligibility certificate¹³.

Issue 7. Caps

1. use cap for charter QS holders only of 1 percent of combined charter and commercial QS units in Area 2C and ½ percent of combined QS units in Area 3A (for all entities, individually and collectively) and grandfather initial issuees at their initial allocation.
2. use caps for charter QS holders only of ½ percent of combined charter and commercial QS units for combined Areas 2C and 3A (for all entities, individually and collectively) and grandfather initial recipients at their initial allocation

Issue 8. Miscellaneous provisions

- Maximum line limit of 12 in Area 3A (remains at 6 lines for Area 2C), grandfather¹⁴ initial recipients at maximum lines in 2005, however, line limits in excess of the maximum are non-transferable.
- 10% underage provision of total IFQs allows carry over to next season.
- A one-year delay between initial issuance of QS and fishing IFQs to allow reaction to initial issuance to match clients to QS prior to first season under program.
- Halibut harvested aboard a charter vessel continues to be the property of the angler who caught the halibut provided the charter owner possesses sufficient IFQ.

Issue 9. IFQs associated with the charter quota shares would be issued in numbers of fish based on 5-year rolling average determined by ADF&G).

Issue 10. Reporting:

Placeholder for NOAA Fisheries Service

¹³ All commercial rules apply to any provision that may permit the use of commercial QS/IFQ for commercial purposes by any entity in the Charter IFQ sector

¹⁴ A business whose permit is endorsed in excess of the permit endorsement maintains that exemption for those that remain in its control after others may be sold, but those sold vessels lose that grandfather status in perpetuity. Grandfathered vessels that are sold in total when a business owner sells his entire business/fleet maintain that grandfathered status.

Issue 11. Community set-aside (trailing amendment for which communities would be included)

- a. Set aside 1% of the combined commercial and charter halibut quota to communities with ¼ percent annual increases if utilized, to a maximum of 2 percent.
- b. Source of the set-aside: Equal pounds from the commercial and charter sectors.
Option : proportional to split between sectors
- c. Sunset provisions: 10 years (starting in the first year of issuance). Persons currently participating in the set-aside program at the time of sunset would be allowed to operate within the guidelines of the program.

Option. Exclude communities from GOA FMP Amendment 66 list using the following criteria:

1. within 20, 40, 60, 80 nmi of major charter port or
2. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing
3. 1-5 number of charter (any species) businesses active in a community
4. See Alternative 2, Issue 6 Communities for Stakeholder Committee list of communities that may result from the above criteria

**STAFF RECOMMENDATIONS
PERMANENT SOLUTION ALTERNATIVES AND OPTIONS
DECEMBER 2006**

New Structure for Permanent Solution Alternatives Staff proposes a new structure for a suite of alternatives for a permanent solution for managing the charter halibut fishery. It is intended solely to aid the Council in identifying distinct management actions for analysis and to aid the public in understanding possible outcomes.

The proposed (moratorium) limited entry program is assumed to be the first action taken by the Council, as a decision is scheduled for April 2007 [listed as Action 1 in the box at right]. NOAA Fisheries Service previously advised the Council that the proposed "moratorium" program is a limited entry system and should not be viewed as "interim;" instead, it should be viewed as the first step in addressing the problem in the fishery and is "permanent" until it is removed or replaced. Therefore, staff concludes that the limited entry option under Alternative 2 (the Allocation alternative) in the second proposed analysis [listed as Action 2 in the box at right] is redundant and confusing because such a program would have been adopted under Action 1. Staff recommends that the proposed limited entry option in the second analysis be dropped.

<p style="text-align: center;">Staff Recommendations for Structuring Charter Halibut Harvest Alternatives</p> <p>First Analysis – final action in April 2007 Action 1. (Moratorium) Limited Entry Alt. 1 No Action Alt. 2 Limited Entry Permit Program Option. Community provisions</p> <p>Second Analysis – final action to be announced Action 2. Allocation between commercial/charter sectors* Alt. 1 No Action Alt. 2 Allocation between sectors and Action 3. Share-Based Systems* Alt. 1 No Action Alt. 2 Limited Entry Permit Endorsements (rods/trips or angler days) Option. Community shares Alt. 3 QS Program Option. Community shares</p> <p>*Actions 2 and 3 can be combined into a single analysis or separated into separate analyses</p>

As revised, Action 2 would set an allocation between the charter and commercial sectors. Identifying the allocation decision as a unique action reduces confusion by streamlining the alternatives to contain only one set of allocation options; currently, the Council's June 2006 motion includes two sets of allocation options, under both the allocation alternative and the QS program alternative. Action 2 could allow leasing of unused allocations between the charter and commercial sectors through a third party (i.e., State of Alaska or regional association). The Council could also choose to take no further action beyond the allocation decision in Action 2. Taking no further action would continue the (moratorium) limited entry permit program as adopted under Action 1.

Under the third step [Action 3], the Council could modify the limited entry program by adding: 1) minimum participation thresholds to reduce the pool of eligible participants; 2) permit endorsements to control effort, based on past history of: i) trips, ii) rods or iii) angler days. These permit endorsements could be designed so that they could be converted into quota share equivalents for transfer with the commercial sector (Alternative 2). Or, the Council could integrate the charter sector with the commercial QS program directly by issuing transferable QS and allowing the market to set allocations between the sectors (Alternative 3).

The timeline and alternatives in a fourth step for local area management plans would be recommended by the State of Alaska.

Community Options The Council should clarify under which actions and alternatives it wishes to include community options in the second analysis. **It does not appear necessary to include community options under the restructured Action 2, as that action would be limited to determining the allocation to the charter halibut sector and the mechanisms by which commercial quota can be transferred to the overall charter sector.** Action 2 does not address the type of entity that can hold a limited entry permit; that decision would be made in the moratorium/limited entry analysis (Action 1) and may be further amended through the alternatives in Action 3 if the Council chooses to do so. *Thus, if the Council stopped after Action 2 and did not proceed with a share-based system under Action 3, communities would be included in the charter halibut program through the Council's moratorium/limited entry preferred alternative in Action 1.* This is because Action 1 provides the status quo scenario for Action 2.

Therefore, the Council should determine whether it wishes to include community options under Action 3 (Alternatives 2 and 3), if it proceeds with a share-based system to control effort. The Council may want to include community options under Action 3, Alternative 2, *if:* 1) it did not already include communities under the moratorium/limited entry decision; or 2) it wishes to amend the community options (eligible communities, use caps, etc.) selected under the moratorium/limited entry decision; or 3) to define the type of permit endorsement that would be applied to permits held by community quota entities. In effect, if community quota entities are allowed to apply for and receive permits under the moratorium action; at a minimum, Alternative 2 would then need to include options for applying endorsements to those permits (since the permit was not earned from charter history).

The Council could also decide whether to revise and/or expand the community provisions under **Action 3, Alternative 3**, in the proposed quota share system. Those options are currently limited to the percentage of charter quota share that would be set aside for communities, and eligibility decisions are delayed to a trailing amendment. These clarifications are needed even if the Council does not adopt staff recommendations to restructure the alternatives.

Staff recommends that the sets of community options should be consistent with one another, and fundamental to this issue is determining community eligibility. **Note that the Council currently has eligibility criteria under the moratorium analysis to establish a set of communities that could receive charter permits. Different eligibility criteria are proposed under Action 3, Alternative 2 (limited entry program with permit endorsements) and no eligibility criteria are proposed under Action 3, Alternative 3 (currently a trailing amendment).** If the Council adopts a set of criteria by which communities are qualified to receive permits under the moratorium (Action 1), the Council should consider whether the same communities should be eligible under Action 3. In this case, no new eligibility criteria would be required under Action 3. Similar to the overall program structure, eligibility to receive a permit could be determined in the moratorium decision, and further amendments to that system, or moving to a share-based system, would be decided under this (permanent solution) analysis.

Alternatively, the Council could create a different set of communities that could participate in the (moratorium) limited entry program versus the programs proposed under Action 3. If so, staff recommends a single set of community eligibility criteria be adopted for both Alternatives 2 and 3 under Action 3. If the Council does not include communities in the moratorium program, then eligibility criteria would need to be added to these alternatives if communities were to be included in Action 3. As discussed below, the timing of the various actions is significant, as many decisions in the first moratorium analysis will factor into the development of necessary options for communities in the second analysis.

More Detailed Comments Elsewhere As is evident by now, a number of critical decisions remain to be addressed by the Council before the analysis can be prepared. Staff has additional recommendations on streamlining the options and suboptions, as listed in staff recommendations for revising the language of

the alternatives and options, and in earlier sections of this discussion paper, but the focus of this section is on the structure of the alternatives. The Stakeholder Committee accepted staff recommendations and provided a significant recommendation to streamline permit endorsement options.

Timing Staff recommends against simultaneous development of the (moratorium) limited entry analysis [Action 1] and the proposed allocation/permit endorsements/share-based system analysis [Actions 2 and 3]. This is to allow for the full development of the first analysis and selection of a preferred alternative, prior to the development of the analysis for its potential amendment through permit endorsements/share-based systems.

Staff are concerned that Council review of two sets of similar, and potentially overlapping, alternatives and options during the same meeting may be confusing and risk inconsistent decision making. Recall that the Council adopted Action 1 to implement a simpler limited entry program with greater speed, while deferring decisions on how to control effort or increase the allocation to a second analysis. The development of the “bells and whistles” that would more specifically address the problems in the fishery (latent capacity, rewarding longevity and/or effort, community protection) was deferred to Action 2 and 3. Dropping the option to replace an “interim” permit system (in the moratorium analysis) with a “permanent” limited entry permit system (in this analysis) goes a long way in eliminating much, but not all, of the confusion noted above. Additional streamlining may be achieved after a review of the Permanent Solution discussion paper and staff recommendations (see highlights below). Yet more streamlining in the future may result from additional staff work on the suite of alternatives adopted for analysis by the Council at its December 2006 meeting.

**STAFF RECOMMENDATIONS FOR RESTRUCTURING
 "PERMANENT SOLUTION"
 ALLOCATION AND SHARE-BASED ALTERNATIVES AND OPTIONS
 NOVEMBER 2006**

ACTION 12. — ALLOCATION

ALTERNATIVE 1. NO ACTION

ALTERNATIVE 2. ALLOCATION TO THE CHARTER HALIBUT SECTOR

Issue 1. Allocation

Option 1. Fixed Percentage of combined commercial/charter catch limit:

formula	Area 2C	Area 3A
a. 125% of average harvest of 2000-2004, translated to percentage	16.37%	165.92%
b. 125% of average harvest of 2000-2004, translated to percentage equal to the 1995-99 GHL, translated to percentage	13.05%	14.11%
c. percentage of combined 2004 commercial/charter catch	154.7%	1312.9%
d. convert current GHL into percentage based on 2004	12.1%	132.9%

Option 2. Fixed Pounds

formula	Area 2C	Area 3A	
a. update GHL to 2000-2004	1.7693 Milb	4.044 Milb	update
b. equal to the 1995-1999 GHL	1.432 Milb	3.7650 Milb	equal to
Suboption 1.	Without step up/down		
Suboption 2.	With stair step up/down provisions if changed by 5, 10, or 15% of the base years (selected above) of the initial allocation- (i.e., if the halibut stock were to fall from 15 to 24 percent below its average CEY, then the allocation would be reduced by 15 percent. If the stock abundance were to fall at least 25 to 34 percent, then the allocation would be reduced by an additional 10 percent. If it continued to decline by at least 10 percent increments, the allocation would be reduced by an additional 10 percent.)		

Suboption. Suballocate between subareas.¹ Develop local area management plans (LAMPs) (placeholder for State of Alaska recommendations)

Issue 2. Overage/Underage

Option 1. ~~apply overages/underages to the following year's allocations by sector~~

Option 2. allow overages/underages to be transferred across sectors

Option 3. 3 or 5 year rolling average of catch to determine if overage/underage occurred in latest year

¹ Develop local area management plans (LAMPs) on a separate timeline.

Option 43. ± 5 or 10% overage/underage results in no management response and >5 or 10% overage/underage leads to change in measures

Issue 3. Mechanisms to increase charter sector harvest with compensation to the commercial sector; increased fishing opportunity to recreational anglers as demand grows; opportunity for charter sector growth in areas that are currently underdeveloped; and maintain stability in coastal communities.

Option 1. Allow the state to hold commercial QS/IFQ and transfer the poundage/percentage to the charter sector
Suboption 1. By purchase of commercial quota share (permanent)
Suboption 2. By lease of commercial IFQs (annual)

Option 2. Allow use of commercial QS in the charter sector through permanent transfer (converted to fish) by purchase or conversion.

Eligibility

Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut QS in the charter fishery

Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut QS in the charter fishery

Permanent Transferability (Sale)

- Commercial QS is fully transferable across sectors and retains original class designations
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.
- Split blocks retain original block designations
- Allow transfer of any (A, B, C, or D) vessel class QS for use in charter sector
- Charter business may not hold more than 1 block of Class D QS \geq sweep-up level

Option 3. Allow use of commercial IFQ in the charter sector through temporary leasing (converted to fish)

- < 10 percent of a commercial QS holder's IFQ may be annually leased to charter sector between private individuals
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.

Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut IFQ in the charter fishery

Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut IFQ in the charter fishery

Option 4. Allow charter halibut limited entry permit holders to convert their permits into increased allocation at initial issuance

Suboption 1. Each charter halibut permit is equal to percentage of charter sector allocation based on total number of charter permits (equal shares)

Suboption 2. Each charter halibut permit is equal to percentage of charter sector allocation based on class or other designation of limited entry permit

ACTION 3. PERMIT ENDORSEMENT/SHARE BASED SYSTEM²

ALTERNATIVE 1. NO ACTION

ALTERNATIVE 2. PERMIT ENDORSEMENTS

~~Issue 4. Mechanisms to finance compensated reallocation to the current charter sector to allow for growth~~

- ~~Option 1. State charter stamp~~
- ~~Option 2. Allow private entities to purchase commercial QS/IFQ and convert to charter allocation; lease back unused allocation at end of year (part of KACO plan)~~
- ~~Option 3. Business Improvement District (tax on trips dedicated to certain purpose)~~
- ~~Option 4. Funds from compensated transfer of unused charter allocation back to commercial sector~~
- ~~Option 5. Allow State to hold IFQs in trust through State bonds (similar to bonds issued recently for construction of State hatchery)~~
- ~~Option 6. Federal funding/grants/stamp to fund entities to purchase QS and convert to charter allocation~~

Issue 1.

ALTERNATIVE 3. LIMITED ENTRY PROGRAM² with PERMIT ENDORSEMENTS

~~(Moratorium) Limited Entry Permit would continue, with some proposed changes~~

~~Permits must be renewed annually.³~~

Permit class endorsements

- Option 1. No permit classes
- Option 2. Permit class
 - Class A. Immediately transferable if more than or equal to a) 10; b) 30; or c) 50 days each year
 - Class B. Non-transferable if less than or equal to preferred alternative above [a) 10; b) 30; or c) 50 days] (except to underdeveloped communities under Issue 13, Option 3, if no permit class is designated)
 - Suboption. By port/subarea (placeholder for State of Alaska)

Issue 2. 3Permit share-based endorsements

~~Option 13. Based on trips Permit class based on from 1998 - 2005 logbook records of total groundfish effort days per season~~

~~Suboption 1. Average of the 3 best years.~~

~~Suboption 2. i. Best year and
ii. Must have a minimum of 10 annual trips for 3A, and minimum of 6 annual trips for 2C (eliminates Area 3A Class H and Area 2C Class G logbooks)~~

	Area 2C			Area 3A	
	Trips	Avg. # Businesses		Trips	Avg. # Businesses
Class G	<6	81	Class H	<10	82
Class F	6 - 10	76	Class G	10 - 25	91
Class E	11 - 25	51	Class F	26 - 35	42
Class D	26 - 35	35	Class E	36 - 45	36
			Class D	46 - 55	32

² Military (Morale, Welfare, and Recreational) boats are exempted from QS program. They could be issued limited entry exemption permits.

³ ~~Permits could not be renewed if allowed to lapse (due to holder's inaction to renew or because minimum activity requirement was not met).~~

Class C	36 – 45	28	Class C	56 – 65	29
Class B	46 – 55	27	Class B	66 – 75	28
Class A	56 – 65 ceiling	24	Class A	76 – 85 ceiling	25
Unclassified	> 66 trips	21	Unclassified	> 86 trips	67

→ ~~AND~~

Option 42. Based on Rods-permit endorsement

- Sub-option 1. equal to the maximum number of rods fished in any one day on the vessel.
- Sub-option 2. equal to best year of 1998-2005 for total number of client rods fished divided by effort days in the chosen season to determine the rod endorsement.

Rod endorsement leases

Suboption 1. Allow transfers, limited to rod endorsement caps and within permit class as follows

6 clients	highest number on any trip in 2004 or 2005
<u>uninspected (6-packs) vessels</u>	<u>inspected vessels (but not less than 4)</u>
<u>new construction (uninspected or inspected vessels)</u>	<u>uninspected >100 gross tons ("Super-T")</u>
<u>constructive loss⁴</u>	<u>constructive loss¹¹</u>

Suboption 2. Allow unlimited transfers

Suboption. Substitute angler day permits for rods in above options

→ ~~OR~~

Option 53. Based on ~~a~~ Angler-days⁵ (= 1 client fishing bottomfish/halibut in 1 day)

Initial issuance - award number of angler day units from ADF&G logbooks which correspond to:

- Suboption 1. Total angler-days during 1998-2005
- Suboption 2. Average angler-days during best 3 years from 1998 – 2005
- Suboption 3. Total angler-days during best 3 years from 1998 – 2005

Endorsement leases

Suboption 1. Allow transfers, limited to angler endorsement caps

Suboption 2. Allow unlimited transfers

Suboption. Substitute angler day permits for rods in above options

Transfers

~~Subo~~Suboption 1. Angler days not transferable

~~Subo~~Suboption 2. Angler days fully transferable:

- 1. Permanent: must go through NMFS (RAM division)
- 2. In-season transfers: allowed between charter businesses

~~11~~ **Issue 3. 4. Permit Leases (in-season only; reverts to permit holder at beginning of next season)**

~~Option 1. not allowed, except for "unavoidable circumstance"~~

~~Option 2. allowed, limited to use cap~~

~~12. Rod endorsement leases~~

~~Option 1. Allow transfers, limited to rod endorsement caps and within permit class (if selected under Issue 3, Option 4)~~

⁴Limited to the endorsement associated with lost vessel.

⁵ Permit endorsement of an angler day for every client fishing bottomfish/halibut in a day.

Option 2. Allow unlimited transfers
Suboption. Substitute angler day permits for rods in above options

13. Vessel replacement and upgrade (can switch between permit classes)

- a. inspected vessels
- b. uninspected vessels

Option 1. Exclude upgrades of uninspected 12 packs over 100 gross t ("Super T" (passenger for hire))
Option 2. Grandfather uninspected 12 packs over 100 gross t

14. Vessel use caps, individually and collectively, with grandfather⁶ provision

uninspected (limited to 6 clients):	inspected and uninspected 12 packs > 100 gross t:
Option 1. 1 permit	Option 1. 1 permit
Option 2. 5 permits	Option 2. 2 permits
Option 3. 10 permits	Option 3. 3 permits

55. Permit use caps, individually and collectively, with grandfather⁶ provision

uninspected (limited to 6 clients):	inspected and uninspected 12 packs > 100 gross t:
Option 1. 10 permit	Option 1. 3 permit
Option 2. 20 permits	Option 2. 6 permits
Option 3. 30 permits	Option 3. 9 permits

Same as under moratorium limited entry program and 1/2 percent of revised Issue 32. Shared-based endorsements (trips, rods, or angler days depending on option selected).

6. Communities

- Option 1. For Areas 2C and 3A communities previously identified under Amendment 66, allow a community represented by a CQE to purchase between 1-10 limited entry permits per community through the CQE.
- Option 2. A CQE representing a community, which has < 10 active⁷ charter businesses with their primary place of business in the community, may request a moratorium permit on behalf of a community resident.
- Area 2C use cap of 3 permits per qualified community
 - Area 3A use cap of 5 permits per qualified community
 - Permits would have limited duration of 5 years after issuance of permit for use by any one individual.
 - Permits would be issued (10, 20, or 30) trips in Area 2C and (20, 40, or 60) trips in Area 3A
 - Suboption. Exclude communities from GOA FMP Amendment 66 list using the following criteria:
 1. within 20, 40, 60, 80 nmi of major charter port or
 2. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing
 3. 1-5 number of charter (any species) businesses active in a community

⁶ A business whose permit is endorsed in excess of the use cap maintains that exemption for those permits that remain in its control after other permits are sold, but those sold permits lose that grandfather status in perpetuity. Grandfathered permits that are sold in total when a business owner sells his entire business/fleet maintain that grandfathered status. Grandfathered status refers to permits, not vessels.

⁷ "Active" is defined as 20 or more charter bottomfish trips per year.

ALTERNATIVE 3. INCLUDE THE CHARTER SECTOR IN THE HALIBUT IFQ PROGRAM

Issue 1. QS recipients

~~Issued to (moratorium) permit holders only~~

~~Participation in the charter halibut fishery by a business during any of the years 1998—2005 AND active participant in 2005 (or most recent year, depending on when analysis commences). Require that permit applicant signs affidavit attesting that all legal requirements were met.⁸~~

Issue 2. Initial distribution of QS

Option 1. Individual allocations shall be divided between two “pools” of recipients. The intent is that once the quota shares are determined for the recipients in “Pool 1” (1998 through 2001 “Pool 1”) those shares are proportionately applied to the initial allocation amount for each area. The remainder of the allocation goes into “Pool 2” for recent participants.

Pool 1 (“Seniority”): Businesses qualified with 1998 through 2001 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individual business owners would be issued QS based on their average effort reported in the ADF&G logbook for 1998 through 2001 for pool 1 (exclude years when not active (do not average 0 years))

Pool 2 (“Recency”): Active businesses (submitted at least one logbook that reported groundfish fishing days) between 2002 and 2005 AND whose business participated in 2005 AND met the legal qualifying criteria.

Suboption 1. A recipient receives 25% of one potential share of this pool for each year of participation during 2002-2005 (four years). For example, a business with participation in all four years would receive a full share (100%). A business with participation in three years would receive 75% of a full share, etc.

Suboption 2. Use client/rod days for days fished to reward client effort (6 client rod days v 1 day for the same fishing trip). (Rods (or number of clients logged in, if rods not filled out), (A year with no effort counts as “0”). Skipper fish counts toward denominator, but not for numerator for QS and not against IFQs). This might need more explanation if left in without further details or use as a note on intent.

Option 2. Businesses qualified with 1998 through 2005 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individuals will pick their best three years during 1998 and 2005 (include “0” for years less than 3) and average their total number of client/rod days for those three years. (groundfish where halibut not available)

Issue 3. Transfer of QS

Permanent QS transfers

1. Initially issued QS to the charter sector is fully transferable within the charter sector.
2. QS from the commercial sector purchased by charter operators is fully transferable (two-way) across sectors and retains original designations.
3. QS issued to charter sector is non-transferable to the commercial sector
4. IFQs used in charter sector may/not be leased within the sector
5. IFQs from the commercial sector transferred for use in the charter sector could be leased to either sector

Temporary transfers (IN-season IFQ lease):

1. [0, 20, 40, 60, 80, 100%] of a charter operators annual IFQ is leasable within the charter sector for no more than 2 out of 5 years of the program.

⁸ ~~The only tangible evidence is the ADF&G logbook, which requires meeting State legal requirements.~~

2. Leasing is defined as the use of IFQ on a charter vessel on which the owner of the QS has less than a 50% ownership interest.
3. A maximum of 30% of a charter operator's annual IFQ may be leased; up to 10% may be leased to commercial sector after August 15; up to 30% may be leased to charter sector. (Allows mop-up by either sector.)

Block restrictions

Allow splitting of commercial blocks to transfer a smaller piece to the charter sector; split blocks retain original designations.

Vessel class restrictions

Allow transfer from A, B, C, and/or D commercial vessel category sizes to charter sector, except that no charter business may hold more than 1 "D" category block equal to or above the sweep-up level.

Issue 4. To receive halibut QS and IFQ by transfer

For the charter sector, must be a permit holder or sign affidavit attesting that all legal requirements were met to participate in the charter fishery.

For the commercial sector, must have a commercial transfer eligibility certificate⁹.

Issue 5. Caps

1. Use cap for charter QS holders only of 1 percent of combined charter and commercial QS units in Area 2C and ½ percent of combined QS units in Area 3A (for all entities, individually and collectively) and grandfather initial issuees at their initial allocation.
2. Use caps for charter QS holders only of ½ percent of combined charter and commercial QS units for combined Areas 2C and 3A (for all entities, individually and collectively) and grandfather initial recipients at their initial allocation.

Issue 6. Miscellaneous provisions

- ~~Maximum line limit of 12 in Area 3A (remains at 6 lines for Area 2C), grandfather¹⁰ initial recipients at maximum lines in 2005, however, line limits in excess of the maximum are non-transferable.~~
- ~~10% underage provision of total IFQs allows carry-over to next season.~~
- A one-year delay between initial issuance of QS and fishing IFQs to allow reaction to initial issuance to match clients to QS prior to first season under program.
- Halibut harvested aboard a charter vessel continues to be the property of the angler who caught the halibut provided the charter owner possesses sufficient IFQ.

Issue 7. IFQs associated with the charter quota shares would be issued in numbers of fish based on 5-year rolling average determined by ADF&G).

Issue 8. Reporting

[Placeholder for NOAA Fisheries Service.]

⁹ All commercial rules apply to any provision that may permit the use of commercial QS/IFQ for commercial purposes by any entity in the charter IFQ sector.

¹⁰ ~~A business whose permit is endorsed in excess of the permit endorsement maintains that exemption for those that remain in its control after others may be sold, but those sold vessels lose that grandfather status in perpetuity. Grandfathered vessels that are sold in total when a business owner sells his entire business/fleet maintain that grandfathered status.~~

Issue 9.

Community set-aside (trailing amendment to determine which communities would be included)

1. Set aside 1 percent of the combined commercial and charter halibut quota to communities with 1/4 percent annual increases if utilized, to a maximum of 2 percent.
2. Source of the set-aside: Equal pounds from the commercial and charter sectors.
Option: proportional split between sectors
3. Sunset provision: 10 years (starting in the first year of issuance). Persons currently participating in the set-aside program at the time of sunset would be allowed to operate within the guidelines of the program.

~~Option. Exclude communities from GOA FMP Amendment 66 list using the following criteria:~~

- ~~1. within 20, 40, 60, 80 nmi of major charter port or~~
- ~~2. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing~~
- ~~3. 1-5 number of charter (any species) businesses active in a community~~
- ~~4. See Alternative 2, Issue 6 Communities for Stakeholder Committee list of communities that may result from the above criteria~~

**Halibut Charter Allocation Issues
Discussion Paper**

**Prepared by
Jonathan King
Northern Economics**

**Jane DiCosimo
North Pacific Fishery Management Council**

September 29, 2006

Abstract: This paper addresses six discussion points associated with Alternatives 2 and 3 of the North Pacific Fishery Management Council's (NPFMC) *Charter Halibut Permanent Solution Alternative and Options* as of July 2006. Staff and Stakeholder Committee members identified these issues as important and potentially complicated. The points include:

- 1) The availability and quality of charter halibut data;
- 2) Alternative 2's specific sector allocation formulas (Issue 1 within Alternative 2);
- 3) Sub-area allocations (Issue 1 of Alternative 3);
- 4) Finance mechanisms for a compensated transfer;
- 5) Permit classes (Issue 4 of Alternative 2); and
- 6) Share-based permit systems (Issue 4 of Alternative 2).

TABLE OF CONTENTS

Overview	5
Availability and Quality of Charter Halibut Harvest Data	11
Description.....	11
Discussion.....	12
Proxy Data	12
Allocations per Qualifying Year	13
Effort-Based Transferable Seat Program (Share System).....	14
Collect New Survey/Logbook Data	15
Sector Allocation Formulas	17
Description.....	17
Discussion.....	17
Percentage Allocations or Fixed Allocations?	17
Implications of Individual Options	18
Fixed Poundage Sub-options: Step-Up/Step-Down Functions	23
Subarea Allocations	25
Area vs. Sub-Area Management	25
Unit Market Effects.....	25
Ports vs. Fishing Areas: Sub-Areas Definitions.....	25
Sub-Area Growth Rates	26
Proposed Finance Mechanisms	27
Description.....	27
Discussion.....	27
State Charter Passenger Stamp	27
Private Entity Purchase with a Lease Back Provision	29
Business Improvement District (Tax on Trips for a Dedicated Purpose)	29
Compensated Transfer of Unused Charter Allocation	31
State Bond Sale	31
Federal Funding	31
Permit Classes	33
Description.....	33
Discussion.....	33
Share-Based Permit Assignment	34
Description.....	34
Discussion.....	34
Option 1-Permits Based on Trips.....	34
Option 2-Rod Permit Endorsement.....	36
Option 3-Angler Days.....	39
REFERENCES	42
LIST OF PREPARERS	43
Appendix A	44

LIST OF TABLES

Table 1. Issues with Methods to Award Halibut Charter Shares.....	12
Table 2. Issue 1-Charter Allocation Options and Sub-options	17
Table 3. Preliminary Effect of Each Alternative in 2004-Illustrative Example	19
Table 4. Estimated Charter Industry Harvests by Year and Millions of Pounds.....	19
Table 5. Finance Mechanisms	27
Table 6. Example Permit Classes	35
Table 7. Rod-endorsement Sub-options	36
Table 8. Effect of Rod Permit Sub-option 2.....	38
Table 9. Rod-endorsement Lease Sub-options	39
Table 10. Angler Days.....	40

LIST OF FIGURES

Figure 1. Step-Up/Step-Down Sub-options in Context.....	23
Figure 2. Sub-Areas in Context.....	25
Figure 3. Permit Classes in the Context of the Alternative	33

ABBREVIATIONS

ADF&G	Alaska Department of Fish and Game
BID	Business Improvement District
CEY	Constant Exploitation Yield
GHL	Guideline Harvest Level
IPHC	International Pacific Halibut Commission
IFQ	Individual Fishing Quota
Lbs	Pounds
M	Million
NPFMC	North Pacific Fishery Management Council
OY	Optimum Yield
QS	Quota Shares
SWHS	Statewide Harvest Survey

OVERVIEW

This paper addresses six discussion points associated with Alternatives 2 and 3 of the North Pacific Fishery Management Council's (NPFMC) *Charter Halibut Permanent Solution Alternative and Options* as of July 2006.¹ These points include 1) the availability and quality of charter halibut data; 2) Alternative 2's specific sector allocation formulas (Issue 1 within Alternative 2); 3) sub-area allocations (Issue 1 of Alternative 3); 4) finance mechanisms for a compensated transfer; 5) permit classes (Issue 4 of Alternative 2); and 6) share-based permit systems (Issue 4 of Alternative 2).

The points discussed in this paper include some of the ingredients under consideration in the proposed permanent solution alternative. However, while the suite of ingredients appears in this document, the actual recipe for putting those ingredients together into a permanent solution is still being developed. Where possible this paper has discussed how different potential options may interact with other options. This discussion will continue to evolve as the recipe for combining options becomes more apparent, but some interactions are already clear. For example, the following effects of the following combinations are discussed in this paper:

- Combining a share-based system based on angler days with a percentage allocation may require management of the number of angler days available to the charter sector. It would seem logical that just as the actual pounds of halibut assigned to each QS in the commercial ? changes each year through the IPHC allocation, that the number of angler days assigned from each share based on historical effort might also change with biomass if the Council pursues a percentage allocation.
- A permit system may be redundant when combined with an effective share-based system. For example, a share-based system based on angler days could function in much the same way the current commercial halibut quota share system functions with regards to managing overall pressure on halibut. At the same time, ownership of shares in the system becomes the de facto permit needed for participation in the system. Hence, a concurrent permit system with additional restrictions may be redundant.
- None of the current options represent a complete solution to the question of compensated transfers. However, several of the options can be combined to create complete financial and compensation solutions.

The sub-sections below discuss the core results from each of the six points.

Availability and Quality of Charter Halibut Harvest Data

The availability and quality of data on past charter halibut harvests are issues State and Federal policy makers have discussed for a number of years. For example, limitations on the use of halibut data collected in the Saltwater Sportfishing Charter Vessel Logbook for 1998-2001 have been widely discussed and debated in the 2001 Preferred Alternative. At its February 2006 meeting, the current Stakeholder Committee discussed limitations with agency staff on the use of Alaska Department of Fish and Game (ADF&G) charter halibut data for allocating catch history or effort history to individual charter halibut operators. The Council is now considering new options to address "recency" by considering information on recent participants who did not meet the qualification criteria in the 2001 Preferred Alternative. These

¹ Please see Appendix A for the text of the current alternatives. The author strongly recommends reading the alternatives before reading this discussion paper.

options include using proxy data, a Quota Share (QS) allocation formula based on participation, awarding angler trips, and collecting more data. Each of these options have positive attributes, but all have significant negative aspects as well. The significant issues range from leaving out some operators who might justifiably belong in the program to waiting several years to collect new data. How quickly the Council wishes to enact the new program would help determine which option is most appropriate.

Sector Allocation Formulas

Issue 1 within Alternative 2 proposes charter sector allocations based on two main options: a fixed percentage and a fixed pound allocation. Overall there are six options currently under consideration, of which four are fixed percentage options and two are fixed poundage options with the potential for step-up or step-down provisions of those “fixed” allocations based on halibut biomass. The discussion came to the following conclusions:

- Fixed percentage options would more directly respond to changes in biomass and IPHC CEY allocations more than fixed poundage options.
- Some options will allocate more halibut to the charter sector than the sector harvested in 2004. Thus, it might be wise to consider how this additional halibut could best benefit the charter and commercial sector if the charter sector is unable to fully use its allocated halibut in the program’s initial years. Fixed percentage options also have the potential to provide more halibut than the charter sector can reasonably use during times of increasing biomass. An in-season lease mechanism could help ensure that both the charter fleet and the commercial sector benefit from any unused charter allocation.
- An inter-sector exchange mechanism could also buffer the charter sector in times of falling biomass if the sector could enter the market for QS.
- An in-season lease mechanism may need to rely on in-season harvest estimates in order to determine whether the charter fleet had excess halibut. The current system of estimating harvests provides estimates months after the end of the calendar year. Thus, the current system would be unable to provide timely enough estimates to manage in-season, inter-sector leasing. Alternatively, charter representatives could recommend an amount needed for the upcoming season before it begins. If the estimated amount is less than the allocated amount the difference could be made available/leased to the commercial sector. These funds could be set aside for future purchases of commercial QS if the charter sector outgrows its allocation.

Sub-Area Allocations

As Issue 1 of Alternative 3, this option would allocate charter halibut on a sub-area level instead of an area level. Alaska Department Fish & Game (ADF&G) staff are preparing additional discussion and text, but have not yet provided these items. Therefore, a general discussion of some of the issues that might arise with sub-area allocations are provided as follows:

- **Area vs. Sub-Area Management** – In general, sub-area management will increase the burden on regulatory agencies because enforcement, monitoring, and management must also occur on a sub-area level. The magnitude of the increased burden will depend on factors such as the number of sub-areas, the rules for transferring QS, the system (if any) used for financing reallocation, etc. Additionally, the process of correctly identifying sub-area’s and sub-area allocations will involve tremendous pressure from stakeholder groups.

- **Unit Market Effects** – Sub-area allocations could result in management unit (unit, angler days, share-based permits) market effects depending on the rules for the transfer of units within the charter sector. For example, an option within Issue 5 of Alternative 3 would allow unit transfers to flow freely within the charter industry. If selected, this option would mean that some sub-areas could conceivably watch their unit transfer to other more profitable areas where demand for unit is higher. While allowing sub-area unit transfers may encourage fishing pressure to increase in sub-areas that are more economical to fish. This transfer to fishing effort would increase localized pressure on halibut, rockfish, and lingcod stocks, which may be of biological concern with sufficient fishing pressure. On the other hand, restricting units from sub-area transfers could also have effects. For example, assume that unit transfer is restricted to the sub-area to which it is allocated. This requirement could restrict area growth because faster growing areas might not be able to acquire units from sub-areas with excess units. Additionally, such a structure could lead to inefficient market conditions and liquidity problems if there are too few purchasers and sellers within a sub-area to support a healthy market. Obviously, larger sub-areas with many market participants would alleviate this problem.
- **Ports vs. Fishing Areas: Sub-Areas Definitions** – In some locations, operators from different ports fish in the same areas. Thus, whether a sub-area is defined around a port or around a fishing area will have important implications. For example, operators from both Whittier and Seward use the area around Montague Island as well as areas closer to their home ports. If the sub-areas are designated by port then harvest will have to be tracked by port. Assigning fishing areas to ports could be difficult. For example, assigning Montague Island in Prince William Sound to operators from one port, but not another would have negative economic effects for the dispossessed fleet members' homeport. However, defining sub-areas around specific fishing grounds would deny operators the flexibility of going to other areas when halibut is scarce in the traditional region or when the weather is bad. Thus, restricting operators to one sub-area could have significant business effects on operators who use a variety of fishing areas or who work long-range/multi-day trips that cross multiple sub-areas. This problem could be solved if the sub-areas were based on geographic areas and not on home ports, and operators are allowed to hold QS in multiple areas.
- **Sub-Area Growth Rates** – Sub-area allocations can be tailored to the growth rates of specific sub-areas without changing the total area-wide allocation. For example, Kodiak is often discussed as a community with a still-developing charter industry, while charter industries in Seward and Homer are considered more mature and well-established. One possible aspect of a sub-area allocation scheme is that the Kodiak sub-area could be allocated more QS per operator/current seat/unit-of-measure, than more mature markets. This approach would assist the growth in Kodiak. However, under an allocation scheme which was "area neutral" the increase in allocation to Kodiak would be balanced by a lower allocation per operator/current seat/unit-of-measure. On the other hand, a sub-area allocation could also protect of areas with lower growth rates. Without sub-area allocations, areas that have stable growth rates would suffer the same as those with higher growth rates. Thus, sub-area allocations will set communities in direct competition with each other for allocated quota. The halibut pie is only so big and changing the way the pie is sliced means that some stakeholders benefit while others lose. NMFS staff have noted that accounting for sub-area growth rates may only be valid in the short-run until the industry grows to fill its "growth allocation" (Gasper, 2006).

Finance Mechanisms

The paper discusses six proposed finance mechanisms as raised by Stakeholder Committee members. These options were originally part of the alternatives, but were recommended for removal because none

of the options would be implemented in regulation, and is therefore not subject to an EA/RIR/IRFA. The Council should decide if it is the appropriate agency to select a mechanism to finance a reallocation from the commercial to the charters sectors, and if so, how to proceed. The authors note that the discussed financing mechanisms have not been vetted by legal counsel and that the discussion of these options here in no way indicates that the options are legally feasible. The legal and regulator details are largely unknown at this point and will need future exploration by federal and state counsels.

A number of these options represent incomplete financing mechanisms that could be combined with other options to create a more complete mechanism. For example, Option 5 calls for IFQs to be held in trust by the State of Alaska, and financed by state revenue bonds. However, bonds are debt instruments and are repaid through revenue streams. Thus, it is incomplete to talk about bond financing without talking about revenue streams. On the other hand, Option 1 provides a revenue stream through a state charter stamp, but doesn't suggest whether this revenue stream will be used to pay back revenue bonds or generate funds prior to the reallocation. Additionally, the option doesn't designate who would hold the QS.

Some options are duplicative. For example, allowing private entities to purchase QS and hold them for a group of operators (Option 2) is very similar to Option 3, which calls for a tax on trips through a Business Improvement District (BID). Because it is unlikely that a public BID would work, Option 3 becomes very similar to Option 2.

These options could be restructured as identified below:

- **Option 1** – A state-run compensation mechanism using revenue bonds.
 - Sub-option 1- Financing through a charter halibut stamp
 - Sub-option 2- Financing through a charter license fee or other business tax
- **Option 2** – An industry-run compensation mechanism using a per-customer, self-taxing mechanism on a:
 - Sub-option 1- State-Level
 - Sub-option 2- IPHC Area Level
 - Sub-option 3- Sub-Area Level

Alternative 2 calls for a compensated transfer (i.e., leasing) of unused charter allocation back to the commercial sector. This option would add significantly to either of the options above because it would allow both the commercial and charter sectors to benefit from unused charter allocation. This arrangement allows the sectors access to the natural advantages of a functioning marketplace without unnaturally preventing the flow of unused charter allocation to businesses that could take full advantage of the allocation. Transferable share-based systems also allow members to access the efficiency gains generated by functioning markets much more readily than “fixed” allocation and management measures. As noted in the discussion of other issues, compensated transfers and harvest of unused charter allocations would have to occur in the same commercial halibut season. Thus, a decision-making mechanism must be developed to determine when charter allocation will go unused and then authorize/document that transfer from one party to another. One mechanism would be for charter representatives to recommend, prior to the beginning of a season, whether and how much allocated halibut should be leased back to the commercial sector. However, under this method of pre-season decision making an additional mechanism

would likely need to exist to ensure that the sum of the sector's pre-season lease amounts and in-season harvest did not exceed overall allocation amount.

Permit Classes

Element 8 of Issue 4 in Alternative 2 establishes two permit class options. The paper poses the following questions and suggestions:

- A traditional permit system may not be necessary if the Council pursues a share-based system utilizing angler day allocations², rod endorsement, or annual trips limits. In any system taking a share-based approach, the ownership of the share effectively acts as a de-facto permit.
- The purpose of permit classes is intended to weed out marginal players and transfer their permit to underdeveloped communities as mentioned in Issue 5 of Alternative 2. The permit classes outlined in Option 2 above would create transferable permits (Class A) above or equal to a certain number of days per year. Class B permits would be assigned to operators that do not make the qualifying threshold. One assumes that these days are effort levels based on history and that operators would attempt to qualify for a Class A or B permit as that element is not clear in the issue's current written form. However, given the advantages of share-based systems staff recommends not pursuing the permit class system. The permits in and of themselves provide no additional benefit, as share-based systems can also weed out marginal players by providing them with allocations too small to continue operating. These operators face a choice of selling their shares or purchasing more shares. In either case, some form of industry consolidation generally follows.

Share-Based Permit System

Element 8, Issue 4 of Alternative 2 consists of three main share permit assignments based on trips, rods, or angler days. Shares based on angler-days would be the most effective harvest control. Both the trip permit and the rod-endorsement option leave room for harvest growth when considered individually. For example, operators would be able to increase harvest under a trip permit option by increasing the number of passengers they take per trip. Under a rod-endorsement option (where the number of passengers fishing at any one time is capped), an operator can increase revenue and harvest by taking more trips or by taking more passengers than can fish at any one time. Two ways to control harvest within these options is to consider the angler-days system or a combined trip permit and rod-endorsement system. Even in this case the angler day system provides more complete control because an operator can still take more passengers than can fish at any one time with a given number of rods. Using just Option 1 (the trip system) or Option 2 (the rod-endorsement system) would allow operators to increase pressure through the mechanisms described above. Staff recommends the use of the angler-days sub-option because it is the only one that provides complete control over harvest pressure and because the system would work in a manner similar to established QS systems.

In addition, the paper discusses the following:

- As with Element 8 above, the current permit discussion does not link to the proposed moratorium permit. In order to avoid confusion and limit opportunities for legal wrangling, it

² The definition of an angler day has not been officially defined for this context, but the author interprets it to mean individual fishing effort by an individual angler with a calendar day regardless of actual duration of effort. Under this definition if an angler booked two charter experiences, one in the morning and one in the evening, in one calendar day then the angler would have generated two angler days.

may make sense for ownership of a moratorium permit to be a condition of receiving a new permanent permit.

- The author requests clarification on the following sentence from Option 1, the share-based permit, “on trips from 1998 - 2005 logbook records of total days of bottomfish effort per season.” Is the option based on trips or groundfish effort days? Clarifying the sentence would be helpful when preparing the analysis.

AVAILABILITY AND QUALITY OF CHARTER HALIBUT HARVEST DATA

Description

Policy makers have discussed issues associated with the availability and quality of data used in estimating past charter halibut harvests for a number of years. For example, limitations on the use of halibut data collected in the Saltwater Sportfishing Charter Vessel Logbook for 1998-2001 have been widely discussed and debated in the 2001 Preferred Alternative. In the end, the Council (through its Scientific and Statistical Committee) found that the data were the best available upon which to base individual share allocations and NOAA raised no legal objections restricting their use.

With respect to the complete lack of halibut harvest data after 2001, ADF&G staff summarize the data limitations as follows:

The missing halibut data question makes it difficult to accurately determine eligibility for businesses to qualify for QS, moratorium, or limited entry, as the Department cannot provide clear determinations of who actually took clients fishing for halibut. There are other proxies that could be used, but all are proxies and thus estimates of who may have chartered clients for halibut. Some will exclude people who may have actually chartered clients for halibut while others would include those that may not have chartered clients for halibut. For example using groundfish areas as a proxy may exclude people who did not record a groundfish if the only species they chartered for was halibut. Conversely, using overall effort may grant fishing privileges to people who only fish salmon.

The Council is now considering new options to address “recency” by considering information on recent participants who did not meet the qualification criteria in the 2001 Preferred Alternative. These options include using proxy data, a share allocation formula based on participation, and awarding angler trips based on 1998 and 1999 data. Additionally staff raised the prospect of collecting more data. Each of these options has positive attributes, but all have significant negative aspects as well (see Table 1). The significant issues range from leaving out some operators who might justifiably belong in the program to waiting several years to collect new data.

Table 1. Issues with Methods to Award Halibut Charter Shares

Method	Proxy Data	Allocation per Qualifying Year	Effort-Based Transferable Seat Program (Share System)	Collect New Data
Positive Aspects	<ul style="list-style-type: none"> Based On Previously Collected Data Addresses Longevity Issue Proxy Data May Be Representative of Past Success. Data biases have been discussed. 	<ul style="list-style-type: none"> Based on Previously Collected Data Addresses Longevity Issue 	<ul style="list-style-type: none"> Provide more complete control of overall effort. Recognizes the halibut charter fleet harvests multiple species 	<ul style="list-style-type: none"> New data collection techniques may address old bias issues (theoretically). Includes all current operators. Ability to design a system which can work with other management components
Negative Aspects	<ul style="list-style-type: none"> Will include businesses who did not catch halibut but reported bottomfish effort Will exclude businesses who failed to Report bottomfish Effort, even if they were not required to (caught salmon while targeting halibut). Magnitude of these Effects is Unknown. 	<ul style="list-style-type: none"> Does not include or reward business success. May be less desirable to successful industry members. May be more vulnerable to cheating. 	<ul style="list-style-type: none"> Data may not be available (To be clarified). 	<ul style="list-style-type: none"> Potential time delay in collecting data. Does not inherently address the longevity issue. May be vulnerable to cheating depending on the type of data collected. New biases may be unknown.

Discussion

Proxy Data

An allocation method could use proxy data based on bottomfish effort captured in ADF&G logbooks. The proxy data are potentially valuable because the state stopped collecting charter halibut catch data in the logbooks after 2001. It continued the requirement to report effort data, but some operators did not comply. In recent years, NPFMC and ADF&G staff investigated possible proxies for the charter catch data. A leading candidate for estimating halibut participation is the bottomfish effort because this is where charters targeting halibut were required to report their effort, and because other bottomfish species are most commonly taken while targeting halibut or in combination with halibut. The use of proxy data has several positive aspects, these include:

- The data are based on past survey efforts and are readily available for use by decision makers.
- The data could be used to address the longevity in the charter industry, which is important to some members of the charter industry.

- Effort for bottomfish might be correlated with success at harvesting halibut and proxy data could not only indicate frequency of trips, but harvest levels.³

While the positives would allow policymakers to make a decision more quickly than with some of the other options, there are significant negative aspects associated with the proxy data. These negatives include:

- The proxy data may not be complete. While the state required all (including halibut) charter operators to report bottomfish harvest and effort by geographic area, a preliminary examination of logbooks since 2002 indicates that all operators may not have complied in 2002 (from a preliminary examination of the data) although compliance may have been better in more recent years. NPFMC staff discussions with some industry participants indicate that some participants did not report their halibut effort. The size of this segment is unknown but initial results below from ADF&G show that approximately one to three percent of records fit this category.

Some charter businesses would not get credit for halibut they caught while targeting salmon, even though they completed their logbook as required. If halibut were caught while targeting salmon they were not supposed to record any bottomfish effort.

- Charter trips that reported bottomfish effort but caught no halibut will get credit for halibut. This would include trips where charters targeted salmon sharks (mostly in Area 3A) or combination trips that did not include halibut (e.g., salmon + lingcod). Undoubtedly some charters recorded bottomfish effort if they caught rockfish or lingcod, even though they weren't targeting them.

Allocations per Qualifying Year

In 2006 the Council adopted several options to use for analysis if the bottomfish logbook data for 2002-2005 are unsuitable for awarding catch or effort allocations to charter operators. One such option is for the Council to base individual allocations on criteria other than catch or effort. For example, the Council could identify a qualifying period of 1997-2005 with the saltwater vessel logbook program commencing in 1998. Any charter operator who could prove any bottomfish or halibut participation in a given year through licenses, business records, or other acceptable means (as defined by the Council) would receive one unit of allocated QS for each year of participation. Thus, the maximum a charter operator could generate would be 9 units if they participated in each qualifying year. An individual unit of QS would be worth the total amount of allocated QS divided by the number of qualifying units. Positives of this method include:

- The method could reward longevity, but would not address individual history. Industry suggestions helped develop this approach to make it more acceptable to those who have a history of success.
- Because the data are based on historical data, they are readily available for use by decision makers.
- The method is relatively simple to execute.

³ That said, the reverse could also be true. Operators might be more likely to actively target rockfish and lingcod on halibut fishing trips where the halibut success rate is low to avoid having clients go home empty handed.

As with the proxy data option, while the positives of this option would allow policymakers to make a decision more quickly than some of the other options, there are also significant negative aspects. These negatives include:

- The option may be less desirable to more successful operators because it does not include or reward individual success in the fishery beyond long-term participation.
- This system may be more vulnerable to allowing non-qualifying individuals into the pool simply for the reason that it may provide more ways to qualify than other options. The greater the number of ways an individual can qualify, the greater the chance that the program will accidentally include individuals who wouldn't qualify under other criteria.

Another aspect of this option will depend on whether the qualifying application requires one to be a current charter operator or not. If past operators are allowed to apply, then the qualification process could award QS to those who are no longer in operation. This issue will arise whenever history is used as part of the qualification process. Allowing past operators to participate would mean additional expense for current operators, because they would likely receive a lower allocation than what they would have if past operators were not included in the program. The Council has identified its preference for requiring participation in the year preceding implementation.

Effort-Based Transferable Seat Program (Share System)

An effort-based transferable seat program is a share system awarding angler days or trips instead of quantity (numbers or pounds) of fish. The charter industry is driven by the number of clients and angler-days and represents a more complete measure of harvest effort and pressure (Vincent Lang 2006). If the amount of fish allocated is not enough for each individual then pressure, which otherwise would have been placed on the halibut resource, will spread out to other, likely state-managed fisheries. Thus, controlling halibut harvest does not necessarily provide a complete control over the overall effort coming from halibut charters as the charter fleet is really a multi-faceted, multi-species industry and increasing controls on halibut volume could exacerbate management issues for other species. An effort-based management system, such as the angler-day option in Issue 4 of Alternative 2, could provide more complete control over the overall effort and enable more effective management of both halibut resource and the resource comprised of other groundfish species.⁴ ADF&G staff reports that data are available to implement such a program. As noted above, Issue 4 of Alternative 2 discusses rod-permit endorsements and angler-day endorsements, which would be similar to awarding trips. The effect of this allotment will in some way be related to the level of transferability built into the program because inevitably some operators may be awarded fewer trips than makes them viable, while some may be awarded more trips than they might use. Transferability of allotments, whether angler days or trips, allows for the most efficient and interested operators to maximize their business while providing less efficient, or interested operators a means of making a compensated exit from the industry. The authors note the pursuit of effort-based transferable seat programs will require close coordination between the federal managers of the halibut fisheries and state managers of other groundfish resources. After comparing the types of share based systems (rods, trips, angler days) the staff recommends the angler day concept (see staff minutes).

Finally, NMFS staff have raised the point that inter-sector transfer of unutilized allocated halibut would be difficult if a conversion needed to be made between angler days and pounds of fish as obtaining

⁴ This statement assumes that operators don't transition from selling "halibut charters" to selling "multi-species" charters. It is possible that under an angler day system we could see more pressure on other species if the majority of halibut charter operators evolve into selling experiences which deliberately target multiple species on every trip.

precise estimates of allowable halibut catch may be difficult. Recent work has found using proxy data to be relatively accurate within homogenous groups, but much less so over heterogeneous groups of anglers (Gasper 2006). These potential difficulties argue for an angler-day system to be paired with an allocation whereby the allocation would be used as the basis of temporary inter-sector exchanges while angler days would form the basis of controlling overall effort.

Collect New Survey/Logbook Data

The Stakeholder committee also discussed collecting additional halibut data for operators. Starting in 2006, ADF&G reinstated the reporting of Pacific halibut harvest and release data in the Saltwater Charter Logbook program. ADF&G has implemented or is planning to implement the following strategies to address the need for accurate reporting of the harvest of Pacific halibut by saltwater charters. The strategies should improve the data collected by the program and include:

- Reporting of kept and released for Pacific halibut will be at the level of the individual chartered client (angler).
- Unique identification information for each client will be required and will be reported with the associated kept and released information for each fish species. One of the following identifiers will be used to identify each client and their trip characteristics: (1) ADF&G Sport Fishing License number; (2) Permanent Identification Card number; (3) Disabled Veterans License number; or (4) name for underage anglers (or possibly identified by accompanying adult's license number). Collecting this information will enable cross-verification (charter operator versus client) of logbook information (see next bullet).
- Off-site (cross-) verification will involve follow-up mail surveys of chartered anglers, using the identifying information provided in the logbook reports, combined with the ADF&G license databases.
- Mandatory recording of all information for each chartered trip before clients and harvest are offloaded at the end of the trip.
- Reporting (i.e., turning in charter logbook sheets) will occur on a weekly basis. Weekly reporting will enable timely feedback to charter operators regarding possible reporting errors and omissions. So, for example, incomplete and missing data in logbooks (e.g., statistical areas missing digits, port of landing missing, no effort information recorded, etc.) can then be addressed in a timely and accurate manner.
- Dock-side creel surveys to provide verification of the number of clients and numbers of Pacific halibut kept will occur for a random sub-sample of locations and charter trips for a yet-to-be determined portion of saltwater charter trips in Southeast and Southcentral Alaska. Verification will involve direct counting of clients upon offloading, and direct observation and counting of harvested halibut.
- Stricter penalties for logbook violations were implemented in 2004 when the legislature passed guide licensing and reporting provisions.

Under this particular option, the Council could table further development of a program to award individual shares until 2010 when three years of SWHS data could verify the accuracy of halibut data in ADF&G logbooks. This option has several significant advantages including:

- The data collected under this option will be recent and reflect the natural changes that have occurred in the charter fleet since the collection effort started nearly a decade ago.
- There is the opportunity to use this system as a potential starting point for the near real-time reporting system necessary to allow charter QS to be leased back to the commercial sector. As mentioned in the discussions of the Sector Allocation Formulas and Finance Mechanisms, the leasing back of charter QS to the commercial sector has the potential to become an important revenue source and stabilization mechanism for a charter QS program. The fact that this option would delay the implementation of that system until 2010 means that the industry and the state can work together to test new reporting methods while collecting the new data.
- The collection of the new data would remove doubts about any decision-making process based on the data collected between 1998 and 2001.
- The option addresses the concerns of those who would like to see a reward for individual success in the fishery.
- Staff recommends separating the development and review of the proposed moratorium and the permanent solution. Staff believes separating the analyses will enable greater public involvement and comprehension of the issues at hand leading to superior analyses.

That said there are also significant potential negatives associated with this option.

- The option delays final implementation of a program until 2010 or later.
- There is no absolute guarantee that the new data currently being gathered will be a better match to SWHS data than the data on halibut harvest the state collected between 1998 and 2001.
- This methodology does not directly address the longevity issue, which has been important to some members of the charter industry. However, this factor could be mitigated by having a longer qualifying period and share system based on effort.
- The program could create a “gold rush” mentality in the charter sector if participants know that their fishing success will directly benefit them in a future allocation system.

SECTOR ALLOCATION FORMULAS

Description

Issue 1 within Alternative 2 proposes charter sector allocations based on two main options: a fixed percentage and a fixed poundage allocation. These allocations options include four proposed percentage options and two proposed poundage options (see Table 2). In addition, the poundage sub-options include stair-step sub-options to increase/decrease an allocation if a biomass threshold is reached. The formulas within the options are the main focus of the discussion while the percentages are preliminary figures indicating an approximate allocation that each formula would produce. Thus, this discussion focuses on the implications of the formulas as opposed to the specifics of the preliminary percentage allocations.

Table 2. Issue 1-Charter Allocation Options and Sub-options

Option	As Written in Alternative	Full Meaning	Approximate Amount	
			Area 2C	Area 3A
1a	125% of average harvest of 2000-2004, translated to percentage	The charter industry's percentage is equal to 125% of the Charter Industry's Harvest from 2000-2004 translated into a percentage of the combined charter/commercial catch during the same period.	16.37%	15.92%
1b	equal to the 1995-99 GHL, translated to percentage	The charter industry's percentage is equal to the 1995-1999 GHL translated into a percentage of the combined charter/commercial catch during the same period	13.05%	14.11%
1c	percentage of combined 2004 commercial/charter catch	The charter industry's percentage is equal to their percentage of the combined 2004 commercial/charter catch.	14.70%	12.90%
1d	Convert current GHL into percentage based on 2004	The charter industry's percentage is equal to the current GHL on a percentage basis using 2004 combined commercial/charter harvest.	12.10%	12.90%
2a	Update GHL to 2000-2004	The charter industry's allocation would be an updated GHL reflecting 2000-2004 biomass estimates and IPHC allocations.	1.693 Mlbs	4.011 Mlbs
2b	Equal to the 1995-1999 GHL	Keep the GHL at its current level.	1.432 Mlbs	3.650 Mlbs

Note: Option 2a and Option 2b have sub-options. The first sub-option would leave Option 2a and 2b without a step-up or step-down provision. The second sub-option would allow step up/down provisions of 5, 10, or 15% of the base years of the initial allocation.

Discussion

Percentage Allocations or Fixed Allocations?

There are two groups of options within this issue: those that use a formula providing an allocated percentage of the total and those that allocate a fixed poundage. All of the options within a group share common characteristics.

Options allocating a percentage automatically adjust with IPHC's estimates of available biomass. This allows the industry to grow when biomass is increasing. On the other hand, this flexibility would also

require that the industry contract in years when biomass declines and the sectors' allocation is not enough to cover its needs. IPHC staff has noted that we are currently at higher relative levels. This contraction could be avoided if the sector were able to purchase or lease additional halibut quota or QS from the commercial sector. The percentage formula could result in allocations to the charter sector could increase beyond the sector's ability to harvest the allocation. This feature represents both a threat and an opportunity. The disadvantage is that leaving charter allocation unharvested fails to maximize the value of the fishery if that allocation could have been harvested by the commercial sector. The opportunity lies in the fact that unharvested allocations represent a potential revenue stream for the industry which could be saved to purchase additional quota for when biomass falls or industry growth increases consumption. Taking advantage of this opportunity requires a mechanism for acquiring additional allocation and holding the money generated for unharvested allocations in trust for the industry. These mechanisms are not without risk as the charter industry would likely need to buy quota when abundance is low and the price is high, and would want to sell it when abundance is high. Options to create some of these mechanisms are part of the proposed alternative. The discussion below indicates that some options are likely to result in unharvested allocations for a period given current industry growth rates. Additionally, we note that the in-season management techniques required to allow these mechanisms to operate have not been developed and will have costs associated with their development and operation. Additionally, in-season management could affect business practices and client bookings if the management team requires restrictions on harvest late in the season (e.g., the sector harvested halibut at a higher rate early in the season than could be sustained by the allocation over the course of an entire season).

The fixed poundage allocation options would not change with biomass unless the second sub-option for a step-up or step-down function is added. Under these sub-options the allocation poundage would change by a set amount when increased or fall to specific trigger point levels. Even with the addition of this sub-option, the poundage allocation is fundamentally less responsive to biomass changes than the percentage changes. This attribute means the amount is more stable than the percentage allocation option. The charter sector would receive more protection in times when biomass decreased, but there would be no upside (without a step-up function) when biomass increased. Even with the proposed step-up function, the poundage allocations would be less responsive to biomass changes than the percentage allocations. For example, assume a poundage option with step-up sub-option of +/- 10 percent is selected. If biomass and what will be the combined commercial/catch CEY increase by 9 percent, the step-up function would not be triggered. This unallocated amount would be roughly 360,000 pounds in Area 3A under Option 2a under current biomass estimates. Thus, while a fixed poundage could adapt to changing biomass, it would not be as smooth an adaptation as under a fixed percentage allocation.

In summary, the fixed percentage options are more flexible, but they also require a mechanism for adapting to changes in halibut biomass. Industry, and the government, will have to be prepared for the implications of both increases and decreases in biomass and IPHC allocations. Poundage options are more stable, but would not allow the charter industry to benefit from biomass increases as quickly or completely as the fixed percentage options. On the other hand, the industry would be somewhat protected by reductions in biomass if the option did not have a step-down function. Staff believes that the benefits provided by the flexibility of fixed percentage allocations are likely to outweigh the stability benefits of poundage allocations

Implications of Individual Options

Options 1a through 1d are based on fixed percentages, while Options 2a and 2b are fixed poundage allocations. Each option represents a different allocation formula and has different implications for both commercial and charter user groups. The analysts prepared the following tables to help compare the options. Table 3 provides a preliminary estimate of how the options would have affected the charter industry in 2004 using 2004 IPHC commercial CEY amounts and estimates of guided sport take in each

area. Table 4 shows estimated charter industry harvests through 2014 as calculated in NPFMC, 2006. These examples assume no other controls are implemented to slow harvest. If the state is successful in getting a change to the Halibut Act and can manage with traditional tools then these harvest could be lowered.

Table 3. Preliminary Effect of Each Alternative in 2004-Illustrative Example

Option	Area 2C (Mlbs)			Area 3A (Mlbs)		
	Actual 2004 Harvest	2004 Amount Under Allocation	Surplus/Deficit to 2004 Harvest	Actual 2004 Harvest	2004 Amount Under Allocation	Surplus/Deficit to 2004 Harvest
1a	1.750	1.962	0.212	3.668	4.464	0.796
1b	1.750	1.564	-0.186	3.668	3.956	0.288
1c	1.750	1.762	0.012	3.668	3.617	-0.051
1d	1.750	1.432	-0.320	3.668	3.650	-0.018
2a	1.750	1.693	-0.057	3.668	4.011	0.343
2b	1.750	1.432	-0.318	3.668	3.650	-0.018

Source: Northern Economics Estimates based on IPHC 2004 RARA.

Table 4. Estimated Charter Industry Harvests by Year and Millions of Pounds

Year	Area 2C	Area 3A
2005	1.639	3.414
2006	1.736	3.501
2007	1.838	3.590
2008	1.947	3.682
2009	2.061	3.776
2010	2.183	3.872
2011	2.312	3.971
2012	2.448	4.072
2013	2.593	4.176
2014	2.746	4.282

Source: NPFMC, 2006.

Option 1a

Under Option 1a the charter industry's percentage is equal to the GHL updated with data from 2000-2004 translated into a percentage of the combined charter/commercial catch during the same period. This option would allocate approximately 16.37 percent of the IPHC's annual commercial/charter allocation in Area 2C and 15.92 percent in Area 3A. In 2004, this option would have provided charters in both Areas 2C and 3A with more halibut than they harvested that year. In Area 2C, the charter industry harvested 1.75 million pounds of halibut, while Option 1a would have provided the industry with 1.962 million pounds. Thus, the industry would have had a surplus of approximately 0.212 million pounds which is roughly 12 percent of actual harvest that year. In Area 3A, the surplus would be approximately 0.796 million pounds or 21.7 percent higher than 2004 harvests. While the actual numbers would likely change in a more rigorous analysis, several important results emerge from this example:

- The allocation to the charter sector would be higher than current charter consumption and the charter GHL. All things being equal, supplying the sector with more than current consumption would mean a reduction for the commercial sector as the charter surplus would exceed commercial underages.
- The charter sector would likely leave allocated halibut in the water unharvested until the natural growth rates of each sector brought harvest up to the same level as the allocation. This unharvested halibut could have brought revenue to the commercial fleet without the allocation. A mechanism such as a lease or auction to return the unharvested halibut to the commercial fleet would allow both fleets to capture the monetary value of the unharvested allocation.
- The growth projections from NPFMC, 2006 (see Table 4) predict that under Option 1a the charter sector in Area 2C would have a surplus until 2008 or 2009, while the charter industry in Area 3A would have a surplus until 2014 or later. Thus, while the option provides some “breathing” room to both sectors, it does not provide a truly stable, long-term solution without either some way to limit future growth or a mechanism that allows the future transfer of quota. This breathing room comes at the expense of commercial revenues and net benefits to the nation.⁵
- Because the option is a percentage allocation based on the size of the resource, the actual poundage or fish allocated to the sector will rise and fall with biomass. An increase in biomass could exacerbate the issue of unharvested halibut, while a decline in biomass would leave the industry short of halibut if there was not another mechanism for acquiring halibut quota from the commercial sector. Under a declining biomass scenario one would expect the price of QS to rise because the commercial sector would also be affected by the declining availability of halibut.

Option 1b

Under Option 1b the charter industry's percentage is equal to the 1995-1999 GHL translated into a percentage of the combined charter/commercial catch during the same period. Early estimates of this option translate into 13.05 percent in Area 2C and 14.11 percent in Area 3A. Using the same estimation technique and 2004 data as used in the discussion for Option 1a, this option would have left the charter industry in Area 2C short of the actual harvest by approximately 0.186 Mlbs in 2004. However, the amount would still be roughly nine percent above the GHL of 1.43 Mlbs. In Area 3A, the option would give the charter sector approximately 0.288 Mlbs more than they harvested, with room to grow in the future. Table 4 shows the analysis estimates that the charter sector in Area 3A would have enough unharvested halibut to absorb the industry's natural growth rate until 2010/2011. Thus, under this option:

- The industry in Area 2C would either have to contract or acquire additional halibut beyond the allocation allowed in the option. The industry in Area 3A would maintain a level of buffer.
- The challenges associated with managing changes in biomass would still exist, but, as noted above, the industry in the two areas would face fundamentally different challenges from the start.
- The allocation in Area 2C would actually return halibut to the commercial sector, compared with the status quo, while the allocation in Area 3A would divert additional halibut from the commercial sector to the charter sector.

⁵ The net benefits loss is mitigated or eliminated if the charter industry can lease excess back to the commercial sector.

Option 1c

Under Option 1c, the charter industry's percentage is equal to its percentage of the combined 2004 commercial/charter catch. Preliminary estimates indicate that this formula would give the charter industry in Area 2C 14.70 percent of the combined commercial and charter allocation, while the Area 3A charter sector would receive 12.90 percent. In both areas in 2004, the amounts this formula would have allocated would have been approximately equal to the amount the respective charter fleet in each area harvested in that year. Thus, under this option:

- The initial reallocation from the commercial sector to the charter sector is approximately no worse than the current unofficial 2004 allocation that occurred when the IPHC set the commercial CEY.
- The option does not leave room for further charter industry growth without acquiring additional halibut QS from the commercial sector. The only way the charter industry could acquire more halibut to fuel future growth without going to the commercial sector would be for the biomass to increase at a rate equal to or greater than the natural growth rate of the charter sector in each area.
- The formula would allocate more than the current GHL in Area 2C because the charter industry exceeded the GHL for that area in 2004 by 0.012 Mlbs. However, in Area 3A the allocation would be almost exactly the same as the current GHL.

Option 1d

Under Option 1d, the charter industry's allocation is equal to the current GHL converted to a percentage using 2004 combined commercial/charter harvest. In Area 2C, the formula would have reduced the amount available for charter harvest without acquisition of additional halibut quota from the harvested 1.750 Mlbs to 1.432 Mlbs; a reduction of less than 20 percent. In Area 3A, the formula would have reduced the amount available for harvest by roughly 18,000 pounds or less than one-half of one percent of the 2004 harvest.

- This option would effectively increase the allocation to the commercial sector from current levels because the amount allocated to the charter sector is less than current harvests. The net effect would be that commercial allocation would likely increase, all these being equal, because estimates of charter harvest are deducted during the IPHC's calculations to set the commercial allocation. IPHC staff has noted that under an allocation plan they would create a combined catch limit for both sectors.
- This option would also result in a need for the charter industry, particularly in Area 2C, to acquire the right to harvest additional halibut, or face an industry-wide contraction. The industry in Area 3A would likely face the same situation, although to a much smaller degree. Future growth would require additional allocation, but the relative magnitude of any contraction without acquiring it would be much smaller. A decrease in biomass would exacerbate this issue while an increase would provide some relief.

Option 2a

Under Option 2a, the charter industry's allocation would revise the GHL, to reflect that the IPHC estimated higher biomass numbers in 2000-2004 were estimated when the NPFMC established the GHL. This formula would provide approximately 1.693 Mlbs to the charter industry in Area 2C, and 4.011 Mlbs to the charter industry in Area 3A compared to 1.432 and 3.650 Mlbs respectively. In a situation similar

to that seen in Option 1b, this allocation would be below 2004 harvest levels for Area 2C and above 2004 harvest levels in Area 3A. Thus, under this option:

- The industry in Area 2C would either have to contract or acquire additional halibut beyond the allocation allowed in the option. The industry in Area 3A would be allocated more than it used to. Prior estimates in NPFMC, 2006 indicate that this amount would cover growth in the industry through 2011/2012.
- The allocation in Area 2C would reallocate halibut to the commercial sector while the allocation in Area 3A would reallocate additional halibut from the commercial sector to the charter sector.
- A step-up/down function driven by biomass would mitigate the industry's need to purchase additional halibut quota when periods of increasing demand and increasing biomass coincide. However, in periods of decreasing biomass and increasing demand, the step-down function would increase the need of the industry to purchase halibut quota. Under these conditions quota share prices are likely to increase as the commercial industry would face similar reductions in available biomass
- Area 3A would have some unharvested allocated halibut for a number of years. A step-up function would increase this unharvested amount. An auction or lease program to ensure the harvest of this unused amount would allow the industry to bank money for the purchase of halibut quota in the years when industry growth outstrips the allocation, or for when the step-down function pushes the allocation below the industry's needs.

Option 2b

Under Option 2b, the charter industry's annual poundage is equal to the current GHY. This formula would give the charter industry in each sector the current GHY. As with Option 1d, in Area 2C and based on 2004 conditions, the formula would have reduced the amount available for charter harvest without acquisition of additional halibut quota from the harvested 1.75 Mlbs to 1.432 Mlbs; a reduction of slightly less than 20 percent. In Area 3A, the formula would have reduced the amount available for harvest by roughly 18,000 pounds or less than one-half of one percent.

- This option would effectively increase the allocation to the commercial sector from current levels because the amount allocated to the charter sector is less than what the sector is currently harvesting and projections of this amount are included in the IPHC commercial CEY calculations.
- This option would also require the charter industry, particularly in Area 2C, to acquire the right to harvest additional halibut or face an industry-wide contraction. The industry in Area 3A would likely face the same situation, although to much smaller degree. Future growth would require additional halibut quota, but the relative magnitude of any contraction without acquiring additional quota would be much smaller. A decrease in biomass would exacerbate this issue while an increase would provide some relief.
- A step-up/down function driven by biomass would mitigate the industry's need to purchase additional halibut quota when periods of increased demand and biomass coincide. However, in periods of decreasing biomass and increasing demand, the step-down function would increase the need of the industry to purchase halibut quota.

Fixed Poundage Sub-options: Step-Up/Step-Down Functions

This issue has two sub-options which apply to Option 2a and Option 2b (see Figure 1). The first sub-option would essentially leave Options 2a and 2b unchanged without a step-up or step-down provision. The second sub-option would allow a step-up or step-down provision to the fixed poundage allocation if halibut biomass and the combined commercial/charter CEY changed from levels at the initial allocation. Staff revised the language adopted by the Council by adding details of the step up/down features of current regulations.

Figure 1. Step-Up/Step-Down Sub-options in Context

ALTERNATIVE 2. ALLOCATION TO THE CHARTER HALIBUT SECTOR			
Issue 1. Allocation			
Option 1. Fixed Percentage of combined commercial/charter catch limit:			
formula	Area 2C	Area 3A	
a. 125% of average harvest of 2000-2004, translated to percentage	16%	16%	
b. equal to the 1995-99 GHL, translated to percentage	13%	14%	
c. percentage of combined 2004 commercial/charter catch	15%	13%	
d. convert current GHL into percentage based on 2004	12%	13%	
Option 2. Fixed Pounds			
formula	Area 2C	Area 3A	
a. update GHL to 2000-2004	1.7 Mlb	4.0 Mlb	
b. equal to the 1995-1999 GHL	1.4 Mlb	3.7 Mlb	
Suboption 1. Without step up/down			
Suboption 2. With stair step up/down provisions if changed by 5, 10, or 15% of the base years (selected above) of the initial allocation (i.e., if the halibut stock were to fall from 15 to 24 percent below its average CEY, then the allocation would be reduced by 15 percent. If the stock abundance were to fall at least 25 to 34 percent, then the allocation would be reduced by an additional 10 percent. If it continued to decline by at least 10 percent increments, the allocation would be reduced by an additional 10 percent.)			

Sub-option 1 would leave the fixed poundage allocation unchanged. This sub-option, when combined with Option 2b, effectively describes the current management regime for charter harvests. This option effectively protects the charter industry if biomass decreases because it would not share with the commercial sector in a harvest reduction. On the other hand, if biomass increases, the charter industry would not share in the increased availability of halibut. Estimates of biomass that were used to set quotas have increased since the original GHL was established in 2000. While that GHL has not changed with the increasing biomass, the charter industry has benefited from the increased biomass through increased resource availability and because the GHL has not been treated as a "hard cap." Under a hard cap scenario, the industry would not automatically benefit from increased biomass with higher allocations. However, the industry might indirectly benefit from increased biomass through increased catch rates or fish size).

Sub-option 2 would allow the fixed poundage allocation to change over time depending on biomass and the IPHC's combined commercial/charter CEY as defined by the 2003 Final Rule for GHL.⁶ This feature would allow the charter industry to benefit when biomass was high, but could leave the charter industry short of halibut in times of low biomass. Sub-option 2 would increase the similarity between the fixed poundage options and the fixed percentage options. That said, the fixed percentage options will adapt more quickly to changes in biomass or combined commercial/charter CEY allocations than the fixed poundage options with sub-option 2. One potential source of tension associated with this sub-option is that the step functions could result in a sudden compensated or uncompensated transfer from the commercial sector to the charter sector. For example, assume that halibut biomass increases to a level marginally below the point that would trigger the step-up function. In this situation, the commercial sector receives 100 percent of the increased combined commercial/charter CEY resulting from the increase in biomass. Now assume that in some later period biomass increases by the marginal amount needed to trigger a reallocation to the charter sector. The amount given to the charter sector could be greater than the marginal increase in CEY, which would leave the commercial sector with less halibut than they had received in the years where abundance was higher than the original level, but still below the threshold to trigger step function. This potential problem is endemic to a step-function system. Defined percentage options will not experience this problem, as they will adjust constantly based on the IPHC's allocations to the combined sectors. In this way defined percentage options are similar to share based systems in that they react to the system around them. However, in this case the "system" in question is halibut biomass.

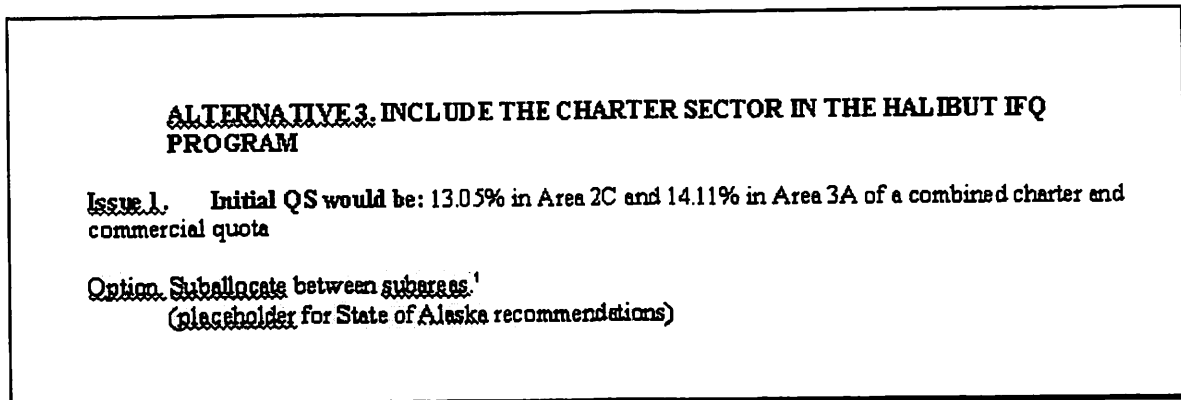
Depending on the timing of the analysis the Council may wait to update all of the options to include the most recent year or five-year range for which data is available. For example, if the analysis starts in early 2007 the Council could revise the options to reflect 2005 and use 2001-2005 date ranges instead of 2000-2004 date ranges.

⁶ The 2003 Final GHL rule established a total maximum poundage responsive to annual reductions in stock abundance. In the event of a reduction in either area's halibut stocks, as determined by the Commission, the area GHL declines incrementally in a stepwise fashion in proportion to the stock reduction. In the 2003 rule, the GHL declines by fixed percentages if the stock abundance falls below the average 1999-2000 stock abundance. The 1999-2000 time frame was chosen because these were the two years most recent to the Council's action. The GHL in each area declines in stepwise increments based on a reduction in the CEY. This reduction would occur the year following the availability of the data indicating that a GHL in a given area has been exceeded. If abundance returns to its pre-reduction level (the 1999-2000 average CEY), the GHL would increase in the following year by commensurate incremental percentage points to its initial level.

SUBAREA ALLOCATIONS

Issue 1 of Alternative 3 would allocate charter halibut on a sub-area level instead of at the area level. At the current time, the authors are awaiting discussion text and data generated by ADF&G staff and are only able to provide a general discussion of some of the issues that might arise with sub-area allocations.

Figure 2. Sub-Areas in Context



Note: For the entire alternative/option please see Appendix A.

Area vs. Sub-Area Management

In general, sub-area management will increase the burden on regulatory agencies because if allocations are handed out on a sub-area level, then enforcement, tracking, and management are also going to have to work on a sub-area level. The magnitude of the increased burden will depend on factors such as the number of sub-areas, the rules for transferring QS, the system (if any) used for financing reallocation, etc. Additionally, sub-area managements may increase the risk of local depletions unless sub-area allocations exactly match biomass distribution. Given that biomass distribution may change over time, initial sub-area management allocations may not reflect biomass in a given sub-area over a longer time frame.

Unit Market Effects

Sub-area allocations could result in management unit (unit, angler days, share-based permits) market effects depending on the rules for the transfer of units within the charter sector. For example, an option within Issue 5 of Alternative 3 would allow unit transfers to flow freely within the charter industry. If selected, this option would mean that some sub-areas could conceivably watch their unit transfer to other more profitable areas where demand for unit is higher. While allowing sub-area unit transfers may encourage fishing pressure to increase in sub-areas that are more economical to fish. This transfer to fishing effort would increase localized pressure on halibut, rockfish, and lingcod stocks, which may be of biological concern with sufficient fishing pressure. On the other hand, restricting units from sub-area transfers could also have effects. For example, assume that unit transfer is restricted to the sub-area to which it is allocated. This requirement could restrict area growth because faster growing areas might not be able to acquire units from sub-areas with excess units. Additionally, such a structure could lead to inefficient market conditions and liquidity problems if there are too few purchasers and sellers within a sub-area to support a healthy market. Obviously, larger sub-areas with many market participants would alleviate this problem.

If the reason for sub-area allocations is to ensure local communities are able to benefit from use of nearby resources and are able to maintain a viable charter business then transferability may not provide for this benefit because it allows businesses to sell their rights to other communities. The market would take care of some of these issues if the community primarily used remote waters; however communities that share the same waters would be in competition with each other for area quota. For example, a community that has high charter angler volume would want to buy sub-area allocation from a community with less angler volume (i.e., Juneau vs Hoonah).

Ports vs. Fishing Areas: Sub-Areas Definitions

In some locations, operators from different ports fish in the same areas. Thus, subareas can be defined on the basis of the geography of the waters fished or the geography of the port of landing (or port of origin). If the point of subareas is to disperse economic benefits, then a definition based on the port of landing is most appropriate, because that is where the economic benefits accrue. No exclusive right to any particular waters needs to be assigned. For example, although there is overlap around Shuyak Island between Cook Inlet and Kodiak boats, the economic benefits accrue in the Cook Inlet and Kodiak subareas, and there is no need to keep these fleets from fishing the same waters.

Sub-Area Growth Rates

Sub-area allocations can be tailored to the growth rates of specific sub-areas without changing the total area-wide allocation. For example, Kodiak is often discussed as a community with a still-developing charter industry, while charter industries in Seward and Homer are considered more mature and well-established. One possible aspect of a sub-area allocation scheme is that the Kodiak sub-area could be allocated more QS per operator/current seat/unit-of-measure, than more mature markets. This approach would allow faster growth in Kodiak. However, under an allocation scheme which was "area neutral" the increase in allocation to Kodiak would be balanced by a lower allocation per operator/current seat/unit-of-measure. Thus, sub-area allocations will set communities in direct competition with each other for allocated quota. The halibut pie is only so big and changing the way the pie is sliced means that some stakeholders benefit while others lose. NOAA Fisheries staff have noted that accounting for sub-area growth rates may only be valid in the short-run until the industry grows to fill its "growth allocation" (Gasper, 2006).

Impacts on Local Abundance and State Managed Species

Subarea allocations of percentage or fixed quotas should also take into account differences between subareas in relative abundance of halibut and availability of state managed species, including salmon and groundfish. For example, suppose eastern PWS is recognized as having an emerging halibut charter fleet, and is given additional room to grow. Halibut habitat is lacking in western PWS and the charter fleet there has a relatively low catch rate. By the same token, the area is high in rockfish habitat, particularly for some of the oldest, slowest-growing species (yelloweye, shortraker). An increase in charter effort would further depress halibut local abundance and increase conservation concerns for rockfish.

PROPOSED FINANCE MECHANISMS

Description

Staff notes that this issue would not be part of a proposed regulation. However, Stakeholder Committee members have raised the issue in the past and this paper has been asked to discuss six potential options outlined by the Stakeholder Committee for financing any allocation that exceeds the current guideline harvest level (see Table 5). In addition, these options could also be used to finance additional halibut quota should industry demand exceed the allocation intended in this action. A permanent mechanism would ensure compensated transfers between both sectors and a whole market. If kept as part of the Council's alternatives, this issue would likely be addressed in an appendix.

Table 5. Finance Mechanisms

Option	Description
1	State charter stamp
2	Allow private entities to purchase commercial QS/IFQ and convert to charter allocation; lease back unused allocation at end of year (part of KACO plan)
3	Business Improvement District (tax on trips dedicated to certain purpose)
4	Funds from compensated transfer of unused charter allocation back to commercial sector
5	Allow state to hold IFQs in trust through state bonds (similar to bonds issued recently for construction of state hatchery)
6	Federal funding/grants/stamp to fund entities to purchase QS and convert to charter allocation

The authors note that the discussed financing mechanisms have not been vetted by legal counsel and that the discussion of these options here in no way indicates that the options are legally feasible. The legal and regulator details are largely unknown at this point and will need future exploration by state and federal agencies.

Discussion

Many of the six options are variations on a central theme and some could better be considered parts of a program as opposed to whole and complete financing mechanisms. For example, a state bond sale cannot happen without a revenue source such as a state charter stamp. It may make more sense for Option 1 to be a state bond sale financed by a charter stamp than to consider the bond sale by itself. Additionally, a private entity purchasing QS is the same as a private business improvement district if the private entity must tax member organizations to fund debt repayment. Staff recommends that this set of options be structured to consider the type of entity that will hold the QS first, with repayment scheme sub-options below. This restructuring would lower the number of overall options and make greater progress towards defining a workable compensation system.

Finally, any option that allows the State to hold commercial QS/IFQ for the charter fleet as a whole will require an amendment to the commercial IFQ program.

State Charter Passenger Stamp

A State charter stamp could be one of the least complicated options to institute because a precedent for the stamp already exists within the state recreational fishing licensing system. Most anglers who wish to fish for anadromous king salmon must purchase a yearly stamp and affix it to their license. A similar system could be required of those wishing to fish for halibut from a charter vessel. An important question that policy makers will face is whether this stamp will be a charter passenger stamp (applying to all

charter passengers in the state), a saltwater charter passenger stamp (applying to all saltwater charter passengers in the state), or a halibut charter passenger stamp (applying only to charter passengers specifically targeting halibut). A stamp requirement on all charter passengers, both fresh and saltwater, would generate the most revenue. However, this system would tax anglers and businesses that are not targeting halibut. The same problem would exist for anglers who specifically target salmon, rockfish, or other non-halibut species. They represent potential revenue sources as charter consumers, but requiring them to purchase a charter stamp would be taxing them for a program which would not benefit them. Thus, potentially the simplest option would be to require the purchase of a halibut charter stamp for anglers going on a halibut charter. Additionally, it might also make sense to require the possession of a stamp for those who wish to retain halibut even on a non-halibut charter.⁷

Policymakers will face certain questions on the stamp program's design. For example, will a stamp be an annual purchase as it is for Alaska residents purchasing a king salmon stamp? Or, will anglers be able to purchase a stamp that is good for a number of days as it is for non-Alaska residents purchasing a king salmon stamp? Revenues may be higher if a new stamp is required for each day of fishing depending on the ratio of the daily price vs. a theoretical annual price.

Program longevity is another consideration. Will this program sunset after the program has paid for the initial reallocation? Or will the program build up a reserve fund to purchase future halibut quota from the commercial sector? The longer the program is in existence the higher the potential that the program's mandate will be expanded and the revenue will be diverted away from the original purpose. If the goal of the program is simply to pay for the reallocation, then it might make sense to build a sunset clause into the program. This clause may be particularly useful if the initial allocation provides the industry with halibut that it can use in the first years after reallocation. Theoretically, this halibut could be leased back to industry, which would shorten the stamp program's life and its effect on businesses and consumers.

Will the stamp program operate prior to the reallocation or will it begin in the same year as the reallocation? The answer to this question could have important implications for the program's long-term cost. If the program operates before the reallocation, it has the potential to build up a portion of the money required to fund the reallocation. If the program does not build up all of the money required for the reallocation, or if the stamp program does not begin before the reallocation, then the funds for the reallocation will initially have to come from another source such as revenue-backed bonds. As with any major consumer purchase, the higher the portion of the money that has to be paid back at interest, the higher the overall costs of the program. Thus, it makes some sense to consider requiring a stamp and placing the revenues in escrow to lower the overall costs of the program in the long-run.

A charter stamp program also solves the problem of free riders that other options would face (see below). A state program would cover all charter fleet boats and benefit them relatively equally. In theory, all boats would have anglers paying to help cover the cost of the program. Under other options, such as a private equity purchase, a sub-group of boats would pay for halibut quota, but non-members have the potential to benefit from the group's purchase. For example, assume that individual boats could purchase a quota and turn the quota over to a common pool. The profit-maximizing incentive under this structure would be to allow others to do the purchasing and then benefit from the common pool. A state charter stamp program avoids this incentive because, theoretically, all anglers on all charter boats would be contributing to this pool.

⁷ We note that halibut bycatch is unlikely while targeting salmon and that charter trips specifically targeting rockfish or other non-halibut species are relatively uncommon.

Private Entity Purchase with a Lease Back Provision

This option would allow private entities to purchase commercial QS/IFQ and convert them to a charter allocation. The option contains a provision to lease back unused allocation at the end of the charter season to maximize its value. There are two basic structural options for working a compensated reallocation. The first is a government-run system such as a state charter stamp program leading to the government holding QS for the charter industry and deciding whether unused QS should be leased back to the commercial sector in any given year. The second basic structure is a private entity purchasing the QS and managing the program, which, in this option, includes a lease back provision.

If the private entity has to raise money by taxing its members, then the advantages and challenges of that organization are exactly the same as those described below when describing the private Business Improvement District. A private entity which already has cash on hand to purchase QS would have a substantial advantage over a structure that has to finance the purchase of QS because cash on hand eliminates the need for interest-bearing loans.

The lease-back provision included specifically in this option should be seriously considered with a potential financing structure. Under this provision, the managing entity could choose to lease unused QS if it became clear that the charter industry was not going to use it before the end of the traditional tourist season. The lease back benefits the charter industry by allowing it to convert unused QS into cash, which can be saved to lease more QS in the future, or used to pay down acquisition debt faster than expected. The lease back benefits the commercial industry by allowing it access to more halibut QS than it would otherwise be able to access. The major challenge facing the lease-back system is that making the decision to lease back QS means that the management entity and ADF&G have to be secure in the knowledge that there are QS to be leased back. In other words, a lease-back provision requires near real-time management so that the decision to lease back quota is valid for the charter industry and fishery managers. Any decision to allow leasing back would require a reporting system similar to commercial fish tickets or an electronic reporting system.

As noted in the Business Improvement District (BID) discussion below, private entities will face challenges with free riders, the question of whether the private entity represents an area or a sub-area, and organizational questions.

Business Improvement District (Tax on Trips for a Dedicated Purpose)

Staff recommends that the Council clarify this option because a BID can take multiple forms, and a tax on trips for a dedicated purpose is a different concept. This would be an irregular use of the BID mechanism. Conventionally, a BID is a finance mechanism that is utilized for urban redevelopment and downtown revitalization. A BID is tied to a specific geographic area and requires property owners within the boundaries of a designated area to vote on a special assessment in return for a higher level of public services. Since the 1970s, downtown and central business districts across the U.S. and Canada have used BIDs to assess properties within a defined area for a higher level of amenities. Revenues from these property assessments within the defined area are directed back to the area- generally a downtown business area- to finance a wide range of services. These services include such things as sanitation, security, maintenance, marketing, business attraction, parking and special events. BIDs are utilized as economic development finance mechanisms to revitalize downtown retail and business areas for the overall health and viability of a community. Imposing a tax on trips through a BID would not be consistent with the traditional use of the BID in financing public services for a collective group of property owners involved in retail and business sector.

A public BID faces numerous hurdles in this instance, including:

- Coordinating multiple municipalities to participate in the program
- Receiving public approval for the BIDs in multiple municipalities
- Overcoming the fact that a public BID would tax businesses not directly linked to the charter industry
- Calculating a different tax policy for each municipality to ensure that each municipality pays its fair share to the program without paying more than its fair share.

We think that the magnitude of these issues would render a public BID a non-starter with some communities, and the public BID would only be fair if all communities were involved.

In a private form of a BID, groups of businesses tax themselves for a specific purpose without involving other business in the same area. In this way, it would seem that this option has the potential to be nearly the same as the option above. For the purposes of this alternative, a private BID would seem to be an easier solution than a public BID, without sub-areas which would involve creating taxation districts in numerous communities with differing tax policies. A private BID, in the form of a tax on trips for a dedicated purpose, is very similar to the Private Entity Purchase option and could be a component of that option. Under this type of program, the charter industry would tax itself on a per-trip basis (or by some other means) and then use that money to purchase QS/IFQ. One of the advantages of the private BID is that it would not directly involve municipalities, voters, or non-charter businesses. On the other hand, it would require a stable, organized, regional (or local area) organization(s) capable of recruiting business to join, collecting the taxes, administering the program, and dealing with any unharvested QS. A major problem that these organizations will face is free riders. Free riders are those that benefit from the works of others in solving a common problem without making a contribution. For example, say a private organization develops in Area 2C to purchase enough halibut QS to support industry in that area. The members of this organization tax themselves on a per customer trip basis to generate the funds necessary to purchase the QS. It is very likely that unless membership in this organization is mandatory, that some operators will opt not to join the group. Yet, if the purchased QS supports the entire industry in the area, these non-members will benefit from the members' self-taxation. Thus, a private organization is likely to face a problem with these free riders and this situation raises the following questions:

- Is there a legitimate legal mechanism to require membership in the organization and limit the free rider problem?
- Can QS/IFQ, the organization purchases, only apply to organization members? It would seem from a management standpoint that tracking the harvests of members and non-members in a real-time environment could be difficult and expensive.

Another set of questions arises as to how many private BIDs would be appropriate and necessary to manage these programs. It is conceivable that one organization could manage the program in both Area 2C and 3A, and this approach would lower administrative costs. At the same time, if the alternative pursues a sub-area management style then it might make sense for operators to form private BIDs on a sub-area level. This arrangement would allow the BIDs to change the taxation rate to fit their particular area's needs. For example, a charter BID organization in a faster growing sub-area could tax its members at a higher rate to account for the need to purchase more QS/IFQ.

As with the Stamp option, when a private BID would start operating has important implications for the program's long-term cost. If the program operates before the reallocation, it has the potential to build up a portion of the money required to fund the reallocation. If the program does not build up all of the money required for the reallocation, or if the stamp program does not begin before the reallocation, then the

funds for the reallocation will initially have to come from another source such as revenue-backed bonds. Thus, it makes some sense to consider starting the BID before the reallocation and placing the revenues in escrow to lower the overall costs of the program in the long run.

Compensated Transfer of Unused Charter Allocation

This option may be more appropriate as an attribute of another program, as opposed to a separate stand-alone option. As noted in the section on the effect of each allocation option, some of the allocation options are likely to result in unharvested halibut for a number of years until industry growth catches up to the overage. Thus, under some options, but not all, there would be some unused charter allocation that might be available for a compensated transfer or lease back to the commercial sector. However, under options providing an allocation less than current harvest, the industry is likely to be looking for funds to purchase additional QS and will not be in a position to lease QS back to the industry. In Area 2C, Option 1a is the only option that would provide significant quota pounds above 2004 consumption levels while the other options are at or below current consumption. In Area 3A Option 1a, 1b, and 2a provide significant quota pounds above 2004 consumption levels, while the other options are at or below current consumption.

State Bond Sale

This option may be more appropriate as an attribute of another program, as opposed to a separate stand-alone option, because bonds are debt instruments and are repaid through revenue streams. Thus, it is inappropriate to consider bond sales without considering the revenue stream that will repay the debt and a state bond sale only makes sense if a state agency is going to hold the QS/IFQ. As noted above, a state-bond offering could fit naturally within a state charter stamp program. Alaska recently experienced great success with the revenue bonds offered to finance the state's construction of new hatcheries. In 2005, the state issued \$67 million in revenue bonds to fund the construction of new hatcheries in Fairbanks and Anchorage. The bonds sold well because of the year-over-year growth of the number of sport fishing licenses sold to anglers. A surcharge on the licenses will help pay back the bonds. The state has estimated that the surcharge will generate \$6 million per year in revenue and the surcharge will sunset when the state completes the bond repayment.

There are other methods for financing a state revenue bond. For example, the state could require halibut charter operators to purchase a new license with the proceeds of license sales supporting the state bond revenues. One issue policymakers would face when designing this program is whether the fee should be structured to the size of the business. A single flat fee is simple, but smaller businesses who carry fewer anglers per year would contribute disproportionately to repaying the bonds. However, Issue 4 of Alternative 2 creates permit classes and considers options such as assigning angler days to charter businesses based on business history. If the size of the license fee were based on the number of angler days or the permit class, then the amount each business paid would be more proportional to the size of the business than under a flat fee system. Both this system and the charter stamp would likely require legislative action. The revenue bonds for the new hatcheries and the accompanying license fee increases were supported by House Bill 252 in the 2005 legislative session.

Federal Funding

This option suggests seeking federal funding/grants/stamp to fund entities to purchase QS and convert them to charter allocation. This option faces several substantial obstacles, not the least of which is increasing competition for federal discretionary funds and declining congressional earmarks from Alaska's congressional delegation. Federal discretionary funds have faced increasing pressure in recent years as the wars in Afghanistan and Iraq continue, the Government aids areas affected by Hurricane

Katrina, the current administration cuts taxes, and social programs such as Medicare, Medicaid, and Social Security grow with an aging population. At the same time, Senator Ted Stevens no longer chairs the powerful Senate Appropriations Committee, and overall earmarks to Alaska projects are in decline. Thus, pursuing this option would mean participating in an increasingly competitive marketplace for a shrinking pool of federal dollars. Other options may represent easier paths.

If this option is chosen, there are several questions that would face this option during the design phase. These include:

- Will this money come from a direct federal appropriation, or can a funding source be identified within the federal structure that would take advantage of existing programs?
- Will the allocation be held by a private organization representing the charter industry, or will the state hold the allocation?
- How much money is needed to secure the allocation?
- Will the money have to be repaid and, if so, what will be the financing mechanisms?
- Will the pursuit of the money delay the implementation of the program?

PERMIT CLASSES

Description

This section discusses the implications of the proposed permit class programs and associated sub-options, some of which contain aspects of share-based systems. This component is part of Element 8, Issue 4 of Alternative 2 before the council and reads:

Figure 3. Permit Classes in the Context of the Alternative

Issue 4. LIMITED ENTRY PROGRAM

Elements of the program

2. **Permits²** may be held by U.S. citizens or U.S. businesses with 75 percent U.S. ownership of the business³. Business may receive multiple permits associated with vessels owned by a business. Currently licensed vessels may be "grandfathered" above proposed limits until any change in ownership.
3. **Permits will have separate designations for Area 2C and Area 3A.**
4. **Permit would be issued to limited entry (moratorium) permit holder only (automatically or upon application)?⁴**
5. **Transfers of permits (permanent) would be allowed**
6. **Permits may be stacked up to use caps^{5,6}**
7. **Permits must be renewed annually⁷**
Evidence of participation - any ADF&G logbook entry with recorded bottomfish statistical area, rods, or boat hours
8. **Permit class**
Option 1. No permit classes
Option 2. Permit class
Class A. Immediately transferable if more than or equal to a) 10; b) 30; or c) 50 days each year
Class B. Non-transferable if less than or equal to preferred alternative above [a) 10; b) 30; or c) 50 days] (except to underdeveloped communities under Issue 13)
Suboption. By port/subarea (placeholder for State of Alaska)

Note: For the entire alternative/option please see Appendix A.

Discussion

The design of the options is intended to weed out marginal players and possibly transfer their permit to underdeveloped communities as mentioned in Issue 5 of Alternative 2. The permit classes outlined in Option 2 above would create transferable permits (Class A), where transferability depended on the number of fishing days allowed per year. Class B permits would be assigned to operators that do not make the qualifying threshold. One assumes that these days are effort levels based on history and that operators would attempt to qualify for a Class A or B permit as that element is not clear in the issue's current written form.

Finally, the author notes that this element makes no mention of the potential moratorium permit under consideration by the Council. It would seem logical to make possession of a moratorium permit a condition of receiving a permit under this option.

SHARE-BASED PERMIT ASSIGNMENT

Description

Element 8, Issue 4 of Alternative 2 consists of three main share permit assignments based on trips, rods, or angler days. The angler days option is the only option that by itself controls industry growth by controlling the only way operators can increase harvest: adding more passengers. Both the trip permit and the rod-endorsement option leave room for harvest growth when considered individually. For example, operators would be able to increase harvest under a trip permit option by increasing the number of passengers they take per trip. Under a rod-endorsement option (where the number of passengers fishing at any one time is capped), an operator can increase revenue and harvest by taking more trips or by taking more passengers than can fish at any one time. Two ways to control harvest within these options is to consider the angler-days system or a combined trip permit and rod-endorsement system. Even in this case the angler day system provide more complete control because an operator can still increase harvest by taking more passengers than can fish at any one time. Using just Option 1 (the trip system) or Option 2 (the rod-endorsement system) would allow operators to increase pressure through the mechanisms described above. Staff recommends the use of the angler-days sub-option because it is the only one that provides complete control over harvest pressure and because the system would work in a manner similar to established QS systems. Element 8, Issue 4, of Alternative 2 is described below. Please see Appendix A for a complete description.

One element common to all option is what happens in the case of a charter vessel going out on a planned halibut trip only to have to head back to the harbor without being able to fish due to stormy weather. Has the operator used up his halibut-trip/daily rod usage/angler days for that day? On the flip-side of that situation, what will stop an operator from not recording his halibut-trip/daily rod usage/angler days if he takes clients on a halibut trip but they do not catch any halibut?

Discussion

Option 1-Permits Based on Trips

This option reads:

Option 1. Based on **trips** from 1998 - 2005 logbook records of total groundfish effort days per season.

Suboption 1. Average of the 3 best years.

Suboption 2. i. Best year and

ii. Must have a minimum of 10 annual trips for 3A, and minimum of 6 annual trips for 2C (eliminates Area 3A Class H and Area 2C Class G logbooks)

Table 6. Example Permit Classes

Area 2C		Area 3A	
Permit Class	Trips	Permit Class	Trips
-	-	Class H	<10
Class G	<6	Class G	10 – 25
Class F	6 – 10	Class F	26 – 35
Class E	11 – 25	Class E	36 – 45
Class D	26 – 35	Class D	46 – 55
Class C	36 – 45	Class C	56 – 65
Class B	46 – 55	Class B	66 – 75
Class A	56 – 65 ceiling	Class A	76 – 85 ceiling
Unclassified	> 66 trips	Unclassified	> 86 trips

Staff notes the following discussion points:

- Staff request clarification on the following sentence “on **trips** from 1998 - 2005 logbook records of total groundfish effort days per season.” Is the option based on trips or groundfish effort days? Clarifying the sentence would be helpful when preparing the analysis.
- At present, Option 1 establishes a permit, but it does not specifically designate the role of the permit. The permit is designed to limit the number of trips a vessel could take in a season by assigning operators to a permit class based on history and then allowing them to take a number of trips per year equal to the top part of their permit’s range. As mentioned above, limiting trips is one way to control harvest. However, under a trip limit, the incentive is for operators to maximize the number of passengers on any one trip. Thus, controlling the number of trips provides only a partial control of effort. If the purpose of this option is to provide a more complete control on effort, then this option should be combined with Option 2—the rod permit endorsement, which controls the maximum number of passengers on a trip.
- The option suggests classifying permits by the number of trips taken in the past and that each permit class would accommodate a range of past-trip averages. Given the issues associated with past logbook data, a ranged approach seems reasonable as there is considerable uncertainty associated with calculating very specific trip averages. However, it would likely be prudent to conduct the analysis prior to creating the actual permit classes, because the analysis might reveal natural breaks in the distribution of the data, which could be used to create the permit classes. For example, data could show that operators break into three narrow groups taking a low, medium, and high number of trips per year with “empty gaps” between each group. In this case, it might make sense to have three permit classes. One issue with ranged groups is that if the regime has very broad ranges in the same class and many vessels near the bottom of the range, then the regime could result in a large increase in the total number of trips taken. Again, it would seem prudent to let the data inform the decision on the number and breadth of the permit classes. Finally, it has been suggested that it might be possible to classify permits by operation type (e.g., weekend only, every-day charters, number of days per week, etc.). This approach could be worth exploring through available data.
- Sub-option 1 and Sub-option 2 would calculate the trip averages used to qualify operators for different permit classes. Sub-option 1 would use the average of the three best years from 1998-2005 while Sub-option 2 would use the best year and eliminate operators with less than a minimum of 10 annual trips in Area 3A, and less than a minimum of 6 annual trips in Area 2C. Thus, sub-option 2 would prevent some marginal operators from receiving permits. While the annual harvest from this

group is likely to be small, the elimination of these operators would likely help to mitigate any increase through the use of ranges in defining permit classes.

- Staff note that this option makes no mention of the potential moratorium permit under consideration by the Council. It would seem logical to make possession of a moratorium permit the de facto permit for the limited entry system if one is actually needed. Staff further note that under share based systems the possession of the share effectively acts as a permit and that the requirement of both share and permit to participate in a fishery duplicates effort.

Option 2-Rod Permit Endorsement

The rod permit endorsement would limit the number of rods that could be fished on a vessel at any given time. As noted above, limiting the number of anglers on a boat is one component of controlling harvest. However, under a rod-endorsement system, the incentive for operators shifts to maximizing the number of trips in a given season. Thus, controlling the number of rods per trip provides only a partial control of effort. If the purpose of this option is to provide a more complete control on effort then this option should be combined with Option 1 which could control the number of trips. This option reads as follows:

Option 2. Based on Rods

Table 7. Rod-endorsement Sub-options

Sub-option Number	Endorsement
1	Equal to the maximum number of rods fished in any one day on the vessel.
2	Equal to best year of 1998-2005 for total number of client rods fished divided by effort days in the chosen season to determine the rod endorsement.

Rod-endorsement leases

Sub-option 1. Allow transfers, limited to rod-endorsement caps and within permit class as follows

<u>6 clients</u>	<u>highest number on any trip in 2004 or 2005</u>
uninspected (6-packs) vessels	inspected vessels (but not less than 4)
new construction (uninspected or inspected vessels)	uninspected >100 gross tons ("Super-T")
constructive loss	constructive loss

Sub-option 2. Allow unlimited transfers

Suboption. Substitute angler day permits for rods in above options

The author notes the following discussion points:

Sub-option 1

The first sub-option would limit the number of rods fished to the maximum number of rods fished in any one day on the vessel. The effect of this sub-option would be felt most keenly by those who consistently limited the number of rods fished on their vessel to a number below the legal maximum. While these individuals could still carry more passengers than their rod endorsement they would only be able to fish as many rods as allowed under their endorsement. This feature could put them at a competitive disadvantage to another business with the same number of seats on board but a higher rod endorsement. This scenario assumes that transfers are allowed. It is not clear what the extent of this effect would be and how many latent seats would be eliminated. The phrase "any one day" means that if the operator

described above fished just one day at maximum capacity, then the sub-option would be much less effective in eliminating latent capacity.

One question about sub-option 1 is whether crew rods would count toward the maximum fished in any one day on the vessel. In this case, a six-passenger vessel operated by a master and mate could conceivably have 8 rods fished in one day. In Area 2C, a charter vessel may only fish as many rods as there are paying clients onboard, up to a 6 rod maximum. Thus, they only fished 6 rods in this example. If you just go by the number of anglers that fished a rod on a trip, then say an inspected vessel in Area 2C with 12 clients onboard and 3 crew could technically say they fished 15 rods on a trip if everyone aboard fished at sometime during the trip. Including crew would effectively raise the rod endorsement of the vessel above the maximum number of passengers the vessel could legally carry. Additionally, if crew members are banned from fishing on the same trip as passengers, then the operator would have permanent excess capacity which might be sold to another operator. This arrangement would mute the option's effect on excess capacity.

Another question about sub-option is the definition of "a day." In this sub-option does "day" mean "trip" or does it mean an actual 24 hours period. A number of operators in both Areas 3A and 2C operate more than one trip in a given day. If the NPFMC means the maximum number of rods in a single trip, then multiple-trips-per-day operators would find themselves short of the number of rod endorsements necessary to continue their current business practices. On the other hand, a broadened definition of a day could result in an excess number of rod endorsements because, as noted in NPFMC 2006, a percentage of operators normally utilize a trip-per-day business model but occasionally make multiple trips in one day during any given season. For example, assume a six-passenger operator generally runs one trip per day, but once during the qualifying period the operator ran two full-capacity trips per day. Under this scenario, the operator would receive a twelve-rod endorsement when the vast majority of his business model depended on fishing six rods or fewer during a given business day. This specific interpretation could lead to a much higher number of endorsed rods than are currently fished by industry in a given year. For example, if the same operator received a 50-days-at-sea permit under Option 2, the difference between the definition of a trip versus a day would be 300 rod days per year. The operator could double the size of their business (other circumstances permitting).

There are also enforcement issues associated with rod permit options. It is relatively easy to hide excess rods on a vessel and it will be difficult for on-water enforcement units to effectively police widely dispersed vessels. While banning additional rods on boards is an option, carrying additional rods may be valid from a charter perspective (e.g., replacement rods in case of breakage). Thus, such a limitation is likely to be highly unpopular.

Sub-option 2

The second sub-option would limit the number of rods fished at any one time to a number equal to the best year of 1998-2005 for a total number of client rods fished divided by days of bottomfish effort in the chosen season to determine the rod endorsement. Staff's interpretation is that "best" focuses on the total number of client rods fished because of the "chosen season" language in the sub-option. Under this interpretation of the sub-option, an operator with a history as shown in Table 8, would have a maximum rod endorsement equal to the operator's average in 2002 because this year was the operators "best" year for total number of client rods. However, it was not the operator's best year for the number of rods per days of bottomfish effort. This operator's best year for average rods per effort day was 2005 when the operator had fewer total client rods, but a higher average number of rods per trip. The effect of this interpretation is that the operator would receive 5 rods per effort day under the current interpretation. If

the NPFMC's intent is for the operator to receive the year between 1998 and 2005 with the highest average number of rods per effort day, then the sub-option should be clarified.

Table 8. Effect of Rod Permit Sub-option 2.

Year	Days of fishing effort	Total Client Rods	Average Trip
1998	47	220	4.7
1999	37	196	5.3
2000	36	176	4.9
2001	33	168	5.1
2002	48	230	4.8
2003	46	179	3.9
2004	40	208	5.2
2005	34	194	5.7

Where the word “best” applies is important because the total number of client rods fished in a year is not solely driven by having a high average number of clients. It is also determined by how many days of bottomfish effort an operator can safely obtain. The weather in some years may allow fewer days of bottomfish effort than the weather in other years. Operators with relatively low fixed costs, but higher relative variable costs, will do better when they have a higher average number of clients per trip rather than when they have many trips with lower averages. The opposite may also be true. For some operators, depending on their business structure, they may fare better financially in a season with more days of bottomfish effort and a slightly lower average rods per trip than they would in a year where the weather allows for significantly fewer days at sea with a higher average number of rods per trip. The variation in days of bottomfish effort per year is likely to be higher in areas where operators see more weather-related cancellations than in areas where operators have more options for fishing during rough weather. Thus, the author requests clarification on this sub-option. Overall, the focus on the highest number of days rather than the highest average of client rods to days would result in a lower average rod endorsement for some operators.

Generally speaking, this option will be more restrictive than sub-option 1 because all an operator has to do to maximize their rod permit endorsement is to have had one day during the qualification period at maximum capacity. Logbook data included trips with up to 60 client and crew rods fished. This sub-option requires operators to have a high number of days at sea combined with a high average number of rods per trip in order to receive a high permit endorsement. If the operator's best year, as measured by total rods fished, coincides with a year of lower average rods per day, then the operator could see a permanent reduction in boat capacity. For example, assume a six-pack operator has a long-term average of 4.6 rods per day, but in the best year as measured by total client days averages 4.4 rods per day. Under normal rounding conventions, the operator would receive an endorsement for 4 rods per day or a roughly 10 percent reduction in comparison to actual long-term effort. Thus, rounding will be an important issue for rod endorsements. Under this management regime, it is now impossible for the operator to ever again achieve their long-term average because getting to 4.6 rods per day requires having five passenger and six passenger days. However, the operator cannot even have five or six passenger days unless they are able to purchase additional rod endorsements. Thus, for this operator to simply get back to where they were before the regulation they have to purchase rod endorsements and the sub-option does not currently include language about transfers.

Again, clarification is needed with this sub-option with regards to the definition of a day of fishing effort. How are regular, or even occasional, multiple-trip-per-day operators treated under this sub-option?

Clarification is also needed as to whether operators could increase their original permit endorsement through rod endorsement leases or if the permit endorsement is meant to serve as a permanent cap.

Rod-endorsement Leases

The option contains two rod-endorsement lease sub-options. The first allows transfer within a permit class and is subject to rod-endorsement caps. As noted above, the author has requested clarification as to whether the initial rod endorsement above is meant to serve as a permanent cap or whether operators can lease additional rod endorsements above their original allocation. The alternative as it currently stands does not specifically outline rod-endorsement caps. The first sub-option divides endorsement into two groups. The first group consists of six-packs and newly constructed vessels with an allowance for constructive loss. The second group consists of larger vessels.

The second sub-option allows unlimited transfers of rod-endorsement leases. It is not clear why the alternative includes a limit on transfers. From a market perspective, the second sub-option would be more efficient as it will allow the unfettered transfer of rod-endorsement permits between those who value them the most and less efficient operators.

Table 9. Rod-endorsement Lease Sub-options

Sub-option Number	Endorsement
	Allow transfers, limited to rod-endorsement caps and within permit class as follows
	<u>6 clients</u> <u>highest number on any trip in 2004 or 2005</u>
1	uninspected (6-packs) vessels new construction constructive loss
	inspected vessels (but not less than 4) uninspected >100 gross tons ("Super-T") constructive loss
2	Allows Unlimited Transfers

Angler Day Sub-Sub Option

Suboption. Substitute angler day permits for rods in above options

Transfers

Option 1. Angler days not transferable

Option 2. Angler days fully transferable:

- 1. Permanent: must go through NMFS (RAM division)
- 2. In-season transfers: allowed between charter businesses

This sub-sub-option would substitute angler day permits for rods in the above options. In this case, there would be no need to combine the option with the permit classes because using angler days provides the most complete control mechanism for controlling harvest as long as daily bag limits are regulated. If angler days are substituted for rod endorsements, the ownership of angler days becomes the de-facto permit.

Option 3-Angler Days

The angler day option (Option 4 of Issue 5 in Alternative 3) would limit operators to a yearly number of angler-days where an angler day is defined as one client fishing bottomfish/halibut in one day. The initial issue would award angler day units from ADF&G logbook data as calculated by one of the methods

outlined in Table 10. How an angler day system would work beyond that has yet to be defined. The discussion section below discusses some of these issues.

Table 10. Angler Days

Sub-option Number	Method
1	Total angler-days during 1998-2005
2	Average angler-days during best 3 years from 1998 – 2005
3	Total angler-days during best 3 years from 1998 – 2005

Note: This option also includes two sub-options one of which does not allow angler days to be transferable and the other which does allow angler days to be transferable.

Sub-option 1-Award based on Total Angler-Days during 1998-2005

Sub-option 1 is intended to reward longevity and activity and would generate a total of angler days between 1998 and 2005. It is unclear how this sub-option would operate from that point. A logical conclusion would be that individual totals would be calculated for operators and that amount would be divided by the overall total to create a share of the overall total. Again, what the percentage would be applied to is currently undefined but a logical answer might be a total number of angler days allocated for the charter fleet. In this way, the angler day units would in practice operate in a manner similar to an IFQ program with the total number of angler days varying each year with biomass. One problem with this approach is that if the number of angler days is not correctly set, then the charter fleet might not be able to use its entire allocation or, conversely, there might be too many angler days for a given amount of allocated halibut. These problems raise the previously discussed issue of in-season leasing of unused charter allocations.

An issue with this approach will be the use of 1998-2005 logbooks and all of the pluses and minuses of that data would apply to this sub-option. As discussed in several sections above, some operators do not generally catch groundfish and thus do not report groundfish effort in logbooks. The size of this industry segment is unknown, but the possibility exists that it could be a substantial portion of the sample universe because rockfish and lingcod are not always targeted or caught on halibut trips. Sub-option 1 would effectively undercount the effort of these individuals, leaving them short of the actual share of the angler days provided under the program.

Finally, staff notes that combining an angler day based share system with an allocation based on biomass may result in a very complicated and unwieldy system. For example, assume the Council pursues a percentage allocation system linked to biomass and combines it with a fixed angler day share system. In a situation where the biomass of halibut increases and the number of angler days remained fixed the potential exists for the industry to leave allocated halibut unharvested unless the daily bag limit for anglers increases as well. Hence, there is no guarantee that an angler day system will automatically allow the charter industry to harvest its allocation. Strong arguments can be made for the case that the Council pursues a percentage allocation and then it should also pursue a system where managers can change the number of angler-days to match changes in allocation. Effectively supply (e.g., the allocation) and demand (e.g., angler days allowed⁸) should adjust with each other if other items (e.g., the daily bag limit) are to remain fixed. It might be far simpler to attach the allocation to biomass and then let businesses compete for their share of passengers and the harvest. Having in-season or even pre-season changes in the number of angler days would be very disruptive to businesses that book a substantial portion of their

⁸ When true demand for charter trips exceeds the number of angler days allotted the number of angler days becomes a proxy for demand.

business in the off-season. If the number of angler days were suddenly reduced, then it could be difficult for the businesses to adapt. Under a system that managed through allocation, the sector could conceivably enter the market to purchase additional QS in a decreasing biomass scenario, thus ensuring seats for their customers.

Sub-option 2-Average Angler Days during the Best 3 Years from 1998-2005.

Unlike sub-option 1 and sub-option 3, this sub-option focuses on an average number of days instead of a total number of days. It is conceivable that the calculation for this sub-option could stop simply at the average of the operator's three best years from 1998 through 2005. The total across all operators would represent the complete pool of angler days. It is not currently known what this total would be or how it compares to current average angler day effort. It is at least conceivable that because the calculation would use everyone's best three years that the number of angler days in the pool could be greater than the number of anglers days that have been fished in recent years. However, given that harvest has been rising steadily, at least in Area 2C, it is also conceivable that this method could result in fewer angler days than generated in last several years.

Another method to use this calculation would be to use the average of the best three years from 1998 through 2005 to generate a total pool of angler days and then calculate an individual share based on those angler day units. This sub-option would then mimic sub-option 1, excepting that the original calculation method would be different. One aspect of this approach is that instead of having a fixed number of angler days, the number of angler days could be varied with biomass.

As with sub-option 1, the use of 1998-2005 logbooks will bring all of the pluses and minuses of that data.

Sub-option 3-Award based on Total Angler-Days during the Best 3 Years, 1998-2005

Sub-option 3 is very similar to sub-option 1 and only differs by the initial calculation. In this sub-option, the formula would generate total of angler days from the best 3 years each operator had between 1998 and 2005. It is unclear how this sub-option would operate from that point. A logical conclusion would be that individual totals would be calculated for operators and that amount would be divided by the overall total to create a share of the overall total. Again, what the percentage would be applied to is currently undefined but a logical answer might be a total number of angler days allocated for the charter fleet. For a discussion the implications of this sub-option, please refer to the discussion of sub-option 1.

Transferability

Transfers

Suboption 1. Angler days not transferable

Suboption 2. Angler days fully transferable:

1. Permanent transfers must go through NMFS (RAM division)

2. In-season transfers: allowed between charter businesses must go through NMFS (RAM division)

REFERENCES

- Alaska Department of Fish and Game. *Responses to Interagency Committee Questions*. August 2006.
- Alaska Department of Fish & Game. *Statewide Harvest Survey (1995-2004)*. 2005.
- Alaska Department of Fish & Game. *Charter Logbook Program (1995-2004)*. 2005.
- Hanson, David. NPFMC. Personal Communication with NEI Staff, August 3, 2006.
- Gaspar, Jason. NOAA Fisheries. Personal Communication with NEI Staff, September 26, 2006
- Interagency Staff Meeting July 18-19, 2006. Charter Halibut Permanent Solution Alternatives. North Pacific Fishery Management Council (NPFMC). 8/30/2006.
- North Pacific Fishery Management Council (NPFMC). 1997. *Draft Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for Proposed Regulatory Amendments to Implement Management Alternatives for Guided Sport Fishery for Halibut off Alaska*. North Pacific Fishery Management Council. Anchorage.
- North Pacific Fishery Management Council (NPFMC). 2003. *Environmental Assessment/Regulatory Impact Review/Final Regulatory Flexibility Analysis for a Regulatory Amendments to Implement Management Measures Under a Guideline Harvest Level and/or Moratorium for the Charter Fishery for Pacific Halibut in Areas 2C and 3A*. North Pacific Fishery Management Council. Anchorage.
- North Pacific Fishery Management Council (NPFMC). 2006. *Public Review Draft Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for a Regulatory Amendment to Implement Guideline Harvest Level Measures in the Halibut Charter Fisheries in IPHC Regulatory Areas 2C and 3A*. North Pacific Fishery Management Council. Anchorage.
- Vincent Lang, Doug. ADF&G. Personal Communication with NEI Staff, August 2006.

LIST OF PREPARERS

Jane DiCosimo
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
Ph: 907.271.2809
Fax: 907.271.2817

Jonathan King
Northern Economics
880 H. Street, Suite 210
Anchorage, AK 99501
Ph: 907.274.5600
Fax: 907.274.5601

APPENDIX A

**DRAFT FOR STAFF COMMENT
NORTH PACIFIC COUNCIL
PERMANENT SOLUTION ALTERNATIVES AND OPTIONS
Interagency Staff Recommendations
JULY 2006**

ALTERNATIVE 1. NO ACTION

ALTERNATIVE 2. ALLOCATION TO THE CHARTER HALIBUT SECTOR

Issue 1. Allocation

Option 1. Fixed Percentage of combined commercial/charter catch limit:

formula	Area 2C	Area 3A
a. 125% of average harvest of 2000-2004, translated to percentage	16%	16%
b. equal to the 1995-99 GHL, translated to percentage	13%	14%
c. percentage of combined 2004 commercial/charter catch	15%	13%
d. convert current GHL into percentage based on 2004	12%	13%

Option 2. Fixed Pounds

formula	Area 2C	Area 3A
a. update GHL to 2000-2004	1.7 Mlb	4.0 Mlb
b. equal to the 1995-1999 GHL	1.4 Mlb	3.7 Mlb
Suboption 1. Without step up/down		
Suboption 2. With stair step up/down provisions if changed by 5, 10, or 15% of the base years (selected above) of the initial allocation (i.e., if the halibut stock were to fall from 15 to 24 percent below its average CEY, then the allocation would be reduced by 15 percent. If the stock abundance were to fall at least 25 to 34 percent, then the allocation would be reduced by an additional 10 percent. If it continued to decline by at least 10 percent increments, the allocation would be reduced by an additional 10 percent.)		

Suboption. Suballocate between subareas.⁹

(placeholder for State of Alaska recommendations)

Issue 2. Overage/Underage

Option 1. allow overages/underages to be transferred across sectors

Option 2. 3 or 5 year rolling average of catch to determine if overage/underage occurred in latest year

Option 3. \pm 5 or 10% overage/underage results in no management response and >5 or 10% overage/underage leads to change in measures

⁹ Develop local area management plans (LAMPs) on a separate timeline.

Issue 2. Mechanisms to increase charter sector harvest with compensation to the commercial sector; increased fishing opportunity to recreational anglers as demand grows; opportunity for charter sector growth in areas that are currently underdeveloped; and maintain stability in coastal communities.

- Option 1. Allow the state to hold commercial QS/IFQ and transfer the poundage/percentage to the charter sector
- Suboption 1. By purchase of commercial quota share (permanent)
 - Suboption 2. By lease of commercial IFQs (annual)
- Option 2. Allow use of commercial QS in the charter sector through permanent transfer (converted to fish) by purchase or conversion.

Eligibility

- Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut QS in the charter fishery
- Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut QS in the charter fishery

Permanent Transferability (Sale)

- Commercial QS is fully transferable across sectors and retains original class designations
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.
- Split blocks retain original block designations
- Allow transfer of any (A, B, C, or D) vessel class QS for use in charter sector
- Charter business may not hold more than 1 block of Class D QS \geq sweep-up level

Option 3. Allow use of commercial IFQ in the charter sector through temporary leasing (converted to fish)

- < 10 percent of a commercial QS holder's IFQ may be annually leased to charter sector between private individuals
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.

Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut IFQ in the charter fishery.

Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut IFQ in the charter fishery

Option 4. Allow charter halibut limited entry permit holders to convert their permits into increased allocation at initial issuance

Suboption 1. Each charter halibut permit is equal to percentage of charter sector allocation based on total number of charter permits (equal shares)

Suboption 2. Each charter halibut permit is equal to percentage of charter sector allocation based on class or other designation of limited entry permit

Issue 4. LIMITED ENTRY PROGRAM¹⁰

Elements of the program

1. **Permits¹¹** may be held by U.S. citizens or U.S. businesses with 75 percent U.S. ownership of the business¹². Business may receive multiple permits associated with vessels owned by a business. Currently licensed vessels may be "grandfathered" above proposed limits until any change in ownership.

¹⁰ Military (Morale, Welfare, and Recreational) boats are exempted from QS program. They could be issued limited entry exemption permits

¹¹ Through initial issuance and transfers

2. **Permits will have separate designations for Area 2C and Area 3A.**
3. **Permit would be issued to limited entry (moratorium) permit holder only (automatically or upon application)?¹³**
4. **Transfers of permits (permanent) would be allowed**
5. **Permits may be stacked up to use caps^{14,15}**
6. **Permits must be renewed annually¹⁶**
Evidence of participation - any ADF&G logbook entry with recorded bottomfish statistical area, rods, or boat hours
7. **Permit class**
 Option 1. No permit classes
 Option 2. Permit class
 Class A. Immediately transferable if more than or equal to a) 10; b) 30; or c) 50 days each year
 Class B. Non-transferable if less than or equal to preferred alternative above [a) 10; b) 30; or c) 50 days] (except to underdeveloped communities under Issue 13)
 Suboption. By port/subarea (placeholder for State of Alaska)
8. **Share-based permit assignment(?)**
 Option 1. Based on trips from 1998 - 2005 logbook records of total groundfish effort days per season
 Suboption 1. Average of the 3 best years.
 Suboption 2. i. Best year and
 ii. Must have a minimum of 10 annual trips for 3A, and minimum of 6 annual trips for 2C (eliminates Area 3A Class H and Area 2C Class G logbooks)

Area 2C		Area 3A	
Permit Class	Trips	Permit Class	Trips
-	-	Class H	<10
Class G	<6	Class G	10 – 25
Class F	6 – 10	Class F	26 – 35
Class E	11 – 25	Class E	36 – 45
Class D	26 – 35	Class D	46 – 55
Class C	36 – 45	Class C	56 – 65
Class B	46 – 55	Class B	66 – 75
Class A	56 – 65 ceiling	Class A	76 – 85 ceiling
Unclassified	> 66 trips	Unclassified	> 86 trips

Option 2. Based on **Rods**

- ¹² Military (Morale, Welfare, and Recreational) boats are exempted from limited entry, but harvests still count against GHL
- ¹³ The only tangible evidence is the ADF&G logbook, which requires meeting all state legal requirements
- ¹⁴ a business can use, for example, two 6-packs license endorsements on one "Super-T" vessel
- ¹⁵ Clarification is requested as to whether a permit that is stacked is always stacked with the other permit or whether the permit must continue to denote its original endorsement
- ¹⁶ Permits could not be renewed if allowed to lapse (due to holder's inaction to renew or because minimum activity was not met)

- Sub-option 1. equal to the maximum number of rods fished in any one day on the vessel.
- Sub-option 2. equal to best year of 1998-2005 for total number of client rods fished divided by effort days in the chosen season to determine the rod endorsement.

Rod-endorsement leases

Sub-option 1. Allow transfers, limited to rod-endorsement caps and within permit class as follows

<u>6 clients</u>	<u>highest number on any trip in 2004 or 2005</u>
uninspected (6-packs) vessels	inspected vessels (but not less than 4)
new construction (uninspected or inspected vessels)	uninspected >100 gross tons ("Super-T")
constructive loss ¹⁷	constructive loss ¹⁰

Sub-option 2. Allow unlimited transfers
 Suboption. Substitute angler day permits for rods in above options

Option 3. Based on **angler-days**¹⁸
Initial issuance - award number of angler day units from ADF&G logbooks which correspond to:
 Suboption 1. Total angler-days during 1998-2005
 Suboption 2. Average angler-days during best 3 years from 1998 – 2005
 Suboption 3. Total angler-days during best 3 years from 1998 – 2005

Angler endorsement leases

Option 1. Allow transfers, limited to angler endorsement caps

<u>6 clients</u>	<u>highest number on any trip in 2004 or 2005</u>
uninspected (6-packs) vessels	inspected vessels (but not less than 4)
new construction (uninspected or inspected vessels)	uninspected >100 gross tons ("Super-T")
constructive loss ¹⁹	constructive loss ¹⁰

Option 2. Allow unlimited transfers
 Suboption. Substitute angler day permits for rods in above options

Transfers

- Option 1. Angler days not transferable
- Option 2. Angler days fully transferable:
 1. Permanent: must go through NMFS (RAM division)
 2. In-season transfers: allowed between charter businesses

9. Permit Leases (in-season only; reverts to permit holder at beginning of next season)

- Option 1. not allowed, except for "unavoidable circumstance"
- Option 2. allowed, limited to use cap

10. Permit use caps, individually and collectively, with grandfather¹³ provision

uninspected vessels: *inspected and uninspected (>100 gt) vessels²⁰:*

¹⁷ limited to the endorsement associated with lost vessel

¹⁸ Permit endorsement of an angler day for every client fishing bottomfish/halibut in a day

¹⁹ limited to the endorsement associated with lost vessel

Option 1. 1 permit
Option 2. 5 permits
Option 3. 10 permits

Option 1. 1 permit
Option 2. 2 permits
Option 3. 3 permits

And ½ percent of revised Issue 11. Shared-based permit assignments (trips, rods, or angler days depending on option selected).

ISSUE 5. Communities

Option 1. For Areas 2C and 3A communities previously identified under Amendment 66, allow a community represented by a CQE to purchase between 1-10 limited entry permits per community through the CQE.

Option 2. A CQE representing a community, in which < 10 active²¹ charter businesses terminated trips, may request a permit on behalf of a community resident.

Area 2C – use cap of 3 permits per qualified community

Area 3A – use cap of 5 permits per qualified community

Permits would have limited duration of 5 years after issuance of permit for use by any one individual.

Permits would be issued (10, 20, or 30) trips in Area 2C and (20, 40, or 60) trips in Area 3A

Suboption. Exclude communities from GOA FMP Amendment 66 list using the following criteria:

1. within 20, 40, 60, 80 nmi of major charter port or
2. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing
3. 1-5 number of charter (any species) businesses active in a community:

ALTERNATIVE 3. INCLUDE THE CHARTER SECTOR IN THE HALIBUT IFQ PROGRAM

Issue 1. Initial QS would be: 13.05% in Area 2C and 14.11% in Area 3A of a combined charter and commercial quota

Option. Suballocate between subareas.²²
(placeholder for State of Alaska recommendations)

Issue 2. QS recipients - Initial allocation of QS would be issued to U.S. citizens or to U.S. businesses with 75 percent U.S. ownership of the business²³.

Issue 3. Qualification Criteria – Issued to interim (moratorium) permit holders only

Issue 4. Initial Distribution of QS:

Option 1. Individual allocations shall be divided between two “pools” of recipients. The intent is that once the quota shares are determined for the recipients in “Pool 1” (1998 through 2001 “Pool 1”) those shares are

²⁰ Inspected and uninspected vessels cannot be differentiated in ADF&G data; these limits were revised to match those in the moratorium analysis

²¹ “Active” is defined as 20 or more charter bottomfish trips per year

²² Develop local area management plans (LAMPs) on a separate timeline.

²³ Military (Morale, Welfare, and Recreational) boats are exempted from QS program. They could be issued QS program exemption permits

proportionately applied to the initial allocation amount for each area. The remainder of the allocation goes into "Pool 2" for recent participants.

Pool 1 ("Seniority"): Businesses qualified with 1998 through 2001 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individual business owners would be issued QS based on their average effort reported in the ADF&G logbook for 1998 through 2001 for pool 1 (exclude years when not active (do not average 0 years))

Pool 2 ("Recency"): Active businesses (submitted at least one logbook that reported groundfish fishing days) between 2002 and 2005 AND whose business participated in 2005 AND met the legal qualifying criteria.

Suboption 1. A recipient receives 25% of one potential share of this pool for each year of participation during 2002-2005 (four years). For example, a business with participation in all four years would receive a full share (100%). A business with participation in three years would receive 75% of a full share, etc.

Suboption 2. Use client/rod days for days fished to reward client effort (6 client rod days v 1 day for the same fishing trip). (Rods(or number of clients logged in, if rods not filled out), (A year with no effort counts as "0") Skipper fish counts toward denominator, but not for numerator for QS and not against IFQs) This might need more explanation if left in without further details or use as a note for yourself on our intent.

Option 2. Businesses qualified with 1998 through 2005 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individuals will pick their best three years during 1998 and 2005 (include "0" for years less than 3) and average their total number of client/rod days for those three years. (groundfish where halibut not available)

Issue 5. Transfer of QS:

Permanent QS transfers

1. Initially issued QS to the charter sector is fully transferable within the charter sector.
2. QS from the commercial sector purchased by charter operators is fully transferable (two-way) across sectors and retains original designations.
3. QS issued to charter sector is non-transferable to the commercial sector
4. IFQs used in charter sector may/not be leased within the sector
5. IFQs from the commercial sector transferred for use in the charter sector could be leased to either sector

Temporary transfers (IN-SEASON IFQ lease):

1. [0, 20, 40, 60, 80, 100%] of a charter operators annual IFQ is leasable within the charter sector for no more than 2 out of 5 years of the program.
2. Leasing is defined as the use of IFQ on a charter vessel on which the owner of the QS has less than a 50% ownership interest.
3. a maximum of 30% of a charter operator's annual IFQ may be leased; up to 10% may be leased to commercial sector after August 15; up to 30% maybe leased to charter sector. (allows mop-up by either sector)

Block restrictions - allow splitting of commercial blocks to transfer a smaller piece to the charter sector - split blocks retain original designations.

Vessel class restrictions - from A, B, C, and/or D commercial vessel category sizes to charter sector, except that no charter business may hold more than 1 "D" category block equal to or above the sweep-up level.

Issue 6. To receive halibut QS and IFQ by transfer:

For the charter sector, must be an initial charter issuee or sign affidavit attesting that all legal requirements were met to participate in the charter fishery.

For the commercial sector, must have a commercial transfer eligibility certificate²⁴.

Issue 7. Caps

1. use cap for charter QS holders only of 1 percent of combined charter and commercial QS units in Area 2C and ½ percent of combined QS units in Area 3A (for all entities, individually and collectively) and grandfather initial issuees at their initial allocation.
2. use caps for charter QS holders only of ½ percent of combined charter and commercial QS units for combined Areas 2C and 3A (for all entities, individually and collectively) and grandfather initial recipients at their initial allocation

Issue 8. Miscellaneous provisions

- A one-year delay between initial issuance of QS and fishing IFQs to allow reaction to initial issuance to match clients to QS prior to first season under program.
- Halibut harvested aboard a charter vessel continues to be the property of the angler who caught the halibut provided the charter owner possesses sufficient IFQ.

Issue 9. IFQs associated with the charter quota shares would be issued in numbers of fish based on 5-year rolling average determined by ADF&G).

Issue 10. Reporting:

Placeholder for NOAA Fisheries Service

Issue 11. Community set-aside (trailing amendment for which communities would be included)

- Set aside 1% of the combined commercial and charter halibut quota to communities with ¼ percent annual increases if utilized, to a maximum of 2 percent.
- Source of the set-aside: Equal pounds from the commercial and charter sectors.
Option : proportional to split between sectors
- Sunset provisions: 10 years (starting in the first year of issuance). Persons currently participating in the set-aside program at the time of sunset would be allowed to operate within the guidelines of the program.

²⁴ All commercial rules apply to any provision that may permit the use of commercial QS/IFQ for commercial purposes by any entity in the Charter IFQ sector

**CHARTER HALIBUT STAKEHOLDER COMMITTEE RECOMMENDATIONS
PERMANENT SOLUTION ALLOCATION/SHARE-BASED ALTERNATIVES AND OPTIONS
OCTOBER 2006**

ACTION 2. ALLOCATION

ALTERNATIVE 1. NO ACTION

ALTERNATIVE 2. ALLOCATION TO THE CHARTER HALIBUT SECTOR

Issue 1. Allocation

Option 1. Fixed Percentage of combined commercial/charter catch limit:

<u>formula</u>	<u>Area 2C</u>	<u>Area 3A</u>
a. <u>125% of average harvest of 2000-2004, translated to percentage</u>	16.37%	165.92%
b. <u>equal to the 1995-99 GHL, translated to percentage</u>	13.05%	14.11%
c. <u>percentage of combined 2004 commercial/charter catch</u>	154.7%	1312.9%
d. <u>convert current GHL into percentage based on 2004</u>	12.1%	132.9%

Option 2. Fixed Pounds

<u>formula</u>	<u>Area 2C</u>	<u>Area 3A</u>	<u>formula</u>
a. <u>update GHL to 2000-2004</u>	1.7693 Milb	4.011 Milb	update
b. <u>equal to the 1995-1999 GHL</u>	1.432 Milb	3.7650 Milb	equal to

Suboption 1. Without step up/down

Suboption 2. With stair step up/down provisions if changed by 5, 10, or 15% of the base years (selected above) of the initial allocation- (i.e., if the halibut stock were to change from 15 to 24 percent from its average CEY, then the allocation would be changed by 15 percent. If the stock abundance were to change at least 25 to 34 percent, then the allocation would change by an additional 10 percent. If it continued to change by at least 10 percent increments, the allocation would change by an additional 10 percent.)

Suboption. Suballocate between subareas.¹ ~~Develop local area management plans (LAMPs)~~
(placeholder for State of Alaska recommendations)

Issue 2. Overage/Underage

Option 1. ~~apply overages/underages to the following year's allocations by sector~~

Option 2. allow overages/underages to be transferred across sectors

Option 3. 3 or 5 year rolling average of catch to determine if overage/underage occurred in latest year

Option 4. ± 5 or 10% overage/underage results in no management response and >5 or 10% overage/underage leads to change in measures

Issue 3. Mechanisms to increase charter sector harvest with compensation to the commercial sector; increased fishing opportunity to recreational anglers as demand grows; opportunity for charter sector growth in areas that are currently underdeveloped; and maintain stability in coastal communities.

¹ Develop local area management plans (LAMPs) on a separate timeline.

Option 1. Allow the state to hold commercial QS/IFQ and transfer the poundage/percentage to the charter sector
Suboption 1. By purchase of commercial quota share (permanent)
Suboption 2. By lease of commercial IFQs (annual)

Option 2a. Allow use of commercial QS in the charter sector through permanent transfer (converted to fish) by purchase or conversion between individual commercial QS holders and the charter sector

Eligibility

Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut QS in the charter fishery

Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut QS in the charter fishery

Permanent Transferability (Sale)

- Commercial QS is fully transferable across sectors and retains original class designations
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.
- Split blocks retain original block designations
- Allow transfer of any (A, B, C, or D) vessel class QS for use in charter sector
- Charter business may not hold more than 1 block of Class D QS \geq sweep-up level

Option 3a. Allow use of commercial IFQ in the charter sector through temporary leasing (converted to fish)

- < 10 percent of a commercial QS holder's IFQ may be annually leased to charter sector between private individuals
- Allow commercial blocks to be split to transfer smaller pieces to the charter sector.

Suboption 1. Must hold a halibut charter limited entry permit to use commercial halibut IFQ in the charter fishery

Suboption 2. Must hold a halibut charter limited entry permit and a commercial transfer eligibility certificate to use commercial halibut IFQ in the charter fishery

Option 3b. Allow commercial QS holders to annually lease their 10 percent underage of commercial IFQ (converted to fish) to increase the charter sector allocation. IFQ would be held by a regional charter association, with administration and collection of fees by the State of Alaska.

Option 4. Allow charter halibut limited entry permit holders to convert their permits into increased allocation at initial issuance

Suboption 1. Each charter halibut permit is equal to percentage of charter sector allocation based on total number of charter permits (equal shares)

Suboption 2. Each charter halibut permit is equal to percentage of charter sector allocation based on class or other designation of limited entry permit

Discussion below is moved to an appendix:

~~Issue 4. Mechanisms to finance compensated reallocation to the current charter sector to allow for growth~~

~~Option 1. State charter stamp~~

~~Option 2. Allow private entities to purchase commercial QS/IFQ and convert to charter allocation; lease back unused allocation at end of year (part of KACO plan)~~

~~Option 3. Business Improvement District (tax on trips dedicated to certain purpose)~~

~~Option 4. Funds from compensated transfer of unused charter allocation back to commercial sector~~

~~Option 5. Allow State to hold IFQs in trust through State bonds (similar to bonds issued recently for construction of State hatchery)~~

~~Option 6. Federal funding/grants/stamp to fund entities to purchase QS and convert to charter allocation~~

ACTION 3. SHARE-BASED SYSTEMS

ALTERNATIVE 1. NO ACTION

**ALTERNATIVE 3². LIMITED ENTRY PROGRAM² with PERMIT ENDORSEMENTS
(Moratorium) Limited Entry Permit would continue, with some proposed changes**

Issue 1. Permits must be renewed annually³

Issue 2. Permit endorsements

Option 1. No permit classes

Option 2. Permit class

Class A. Immediately transferable if more than or equal to a) 10; b) 30; or c) 50 days each year

Class B. Non-transferable if less than or equal to preferred alternative above [a) 10; b) 30; or c) 50 days] (except to underdeveloped communities under Issue 13, Option 3, if no permit class is designated)

Suboption. By port/subarea (placeholder for State of Alaska)

~~Option 3. Permit class based on 1998-2005 logbook records of total groundfish effort days per season~~

~~Suboption 1. Average of the 3 best years.~~

~~Suboption 2. i. Best year and~~

~~ii. Must have a minimum of 10 annual trips for 3A, and minimum of 6 annual trips for 2C (eliminates Area 3A Class H and Area 2C Class G logbooks)~~

Area 2C			Area 3A		
Trips	Avg. #	Business	Trips	Avg. #	Businesses
Class G	<6	81	Class H	<10	82
Class F	6 10	76	Class G	10 25	91
Class E	11 25	51	Class F	26 35	42
Class D	26 35	35	Class E	36 45	36
Class C	26 35	35	Class D	46 55	32
Class B	46 55	21	Class C	56 65	29
Class A	46 55	21	Class B	66 75	28
Class A	56 65 ceiling	14	Class A	76 85 ceiling	25
Unclassified	> 66 trips	71	Unclassified	> 86 trips	67

~~Option 4. Rod permit endorsement~~

~~Sub option 1. equal to the maximum number of rods fished in any one day on the vessel.~~

~~Sub option 2. equal to best year of 1998-2005 for total number of client rods fished divided by effort days in the chosen season to determine the rod endorsement.~~

Issue 3. Permit share-based assignment based on Angler Client-days⁴ (= 1 client fishing bottomfish/halibut in 1 day)

Initial issuance - award number of angler client day units from ADF&G logbooks which

correspond to:

Suboption 1. Total angler client-days during 1998-2005

Suboption 2. Average angler client-days during best 3 years from 1998 - 2005

Suboption 3. Total angler client-days during best 3 years from 1998 - 2005

² Military (Morale, Welfare, and Recreational) boats are exempted from QS program. They could be issued limited entry exemption permits

³ Permits could not be renewed if allowed to lapse (due to holder's inaction to renew or because minimum activity was not met)

⁴ Permit endorsement of an angler day for every client fishing bottomfish/halibut in a day

Endorsement leases

Suboption 1. Allow transfers, limited to client day endorsement caps

Suboption 2. Allow unlimited transfers

~~Suboption. Substitute client day permits for rods in above options~~

Transfers

SuboSuboption 1. AnglerClient days not transferable

SuboSuboption 2. AnglerClient days fully transferable:

1. Permanent: must go through NMFS (RAM division)
2. In-season transfers: allowed between charter businesses

Issue 4. Permit Leases (in-season only; reverts to permit holder at beginning of next season)

Option 1. not allowed, except for "unavoidable circumstance"

Option 2. allowed, limited to use cap

12. Rod endorsement leases

~~Option 1. Allow transfers, limited to rod endorsement caps and within permit class (if selected under Issue 3, Option 4)~~

~~Option 2. Allow unlimited transfers~~

~~Suboption. Substitute angler day permits for rods in above options~~

13. Vessel replacement and upgrade (can switch between permit classes)

~~a. inspected vessels~~

~~b. uninspected vessels~~

~~Option 1. Exclude upgrades of uninspected 12 packs over 100 gross t ("Super T" (passenger for hire))~~

~~Option 2. Grandfather uninspected 12 packs over 100 gross t~~

14. Vessel use caps, individually and collectively, with grandfather⁵ provision

~~uninspected (limited to 6 clients) : inspected and uninspected 12 packs > 100 gross t:~~

~~Option 1. 1 permit Option 1. 1 permit~~

~~Option 2. 5 permits Option 2. 2 permits~~

~~Option 3. 10 permits Option 3. 3 permits~~

Issue 5. Permit use caps, individually and collectively, with grandfather provision

~~uninspected (limited to 6 clients) : inspected and uninspected 12 packs > 100 gross t:~~

~~Option 1. 10 permit Option 1. 3 permit~~

~~Option 2. 20 permits Option 2. 6 permits~~

~~Option 3. 30 permits Option 3. 9 permits~~

Same as under 1 program and 1/2 percent of revised Issue 3. Shared-based assignments (trips, rods, or client days depending on option selected).

OPTION: Placeholder for development of endorsements on permits held by communities

⁵ A business whose permit is endorsed in excess of the permit endorsement maintains that exemption for those that remain in its control after others may be sold, but those sold vessels lose that grandfather status in perpetuity. Grandfathered vessels that are sold in total when a business owner sells his entire business/fleet maintain that grandfathered status.

6. Communities

- ~~Option 1. For Areas 2C and 3A communities previously identified under Amendment 66, allow a community represented by a CQE to purchase between 1-10 limited entry permits per community through the CQE.~~
- ~~Option 2. A CQE representing a community, in which has < 10 active⁶ charter businesses with their primary place of business in the community terminated trips, may request a moratorium permit on behalf of a community resident.~~
- ~~Area 2C use cap of 3 permits per qualified community~~
 - ~~Area 3A use cap of 5 permits per qualified community~~
 - ~~Permits would have limited duration of 5 years after issuance of permit for use by any one individual.~~
 - ~~Permits would be issued (10, 20, or 30) trips in Area 2C and (20, 40, or 60) trips in Area 3A~~
 - ~~Suboption. Exclude communities from GOA FMP Amendment 66 list using the following criteria:~~
 - ~~1. within 20, 40, 60, 80 nmi of major charter port or~~
 - ~~2. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing~~
 - ~~3. 1-5 number of charter (any species) businesses active in a community~~

ALTERNATIVE 43. INCLUDE THE CHARTER SECTOR IN THE HALIBUT IFQ PROGRAM

~~Issue 1. QS recipients - Issued to (moratorium) limited entry permit holders only~~

~~Participation in the charter halibut fishery by a business during any of the years 1998-2005 AND active participant in 2005 (or most recent year, depending on when analysis commences). Require that permit applicant signs affidavit attesting that all legal requirements were met.⁷~~

~~Issue 2. Initial Distribution of QS:~~

~~Option 1. Individual allocations shall be divided between two "pools" of recipients. The intent is that once the quota shares are determined for the recipients in "Pool 1" (1998 through 2001 "Pool 1") those shares are proportionately applied to the initial allocation amount for each area. The remainder of the allocation goes into "Pool 2" for recent participants.~~

~~Pool 1 ("Seniority"): Businesses qualified with 1998 through 2001 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individual business owners would be issued QS based on their average effort reported in the ADF&G logbook for 1998 through 2001 for pool 1 (exclude years when not active (do not average 0 years))~~

~~Pool 2 ("Recency"): Active businesses (submitted at least one logbook that reported groundfish fishing days) between 2002 and 2005 AND whose business participated in 2005 AND met the legal qualifying criteria.~~

~~Suboption 1. A recipient receives 25% of one potential share of this pool for each year of participation during 2002-2005 (four years). For example, a business with participation in all four years would receive a full share (100%). A business with participation in three years would receive 75% of a full share, etc.~~

~~Suboption 2. Use client/rod days for days fished to reward client effort (6 client rod days v 1 day for the same fishing trip). (Rods (or number of clients logged in, if rods not filled out), (A year with no effort counts as "0") Skipper fish counts toward denominator, but not for numerator for QS and not against IFQs) This might need more explanation if left in without further details or use as a note for yourself on our intent.~~

~~Option 2. Businesses qualified with 1998 through 2005 logbook catch history AND must have business participation in 2005 (or most current year) AND meet the legal qualifying criteria. Individuals will pick their best three years during 1998 and 2005 (include "0" for years less than 3) and average their total number of client/rod days for those three years. (groundfish where halibut not available)~~

⁶ "Active" is defined as 20 or more charter bottomfish trips per year

⁷ The only tangible evidence is the ADF&G logbook, which requires meeting State legal requirements

Issue 3. Transfer of QS:

Permanent QS transfers

1. Initially issued QS to the charter sector is fully transferable within the charter sector.
2. QS from the commercial sector purchased by charter operators is fully transferable (two-way) across sectors and retains original designations.
3. QS issued to charter sector is non-transferable to the commercial sector
4. IFQs used in charter sector may/not be leased within the sector
5. IFQs from the commercial sector transferred for use in the charter sector could be leased to either sector

Temporary transfers (IN-SEASON IFQ lease):

1. [0, 20, 40, 60, 80, 100%] of a charter operators annual IFQ is leasable within the charter sector for no more than 2 out of 5 years of the program.
2. Leasing is defined as the use of IFQ on a charter vessel on which the owner of the QS has less than a 50% ownership interest.
3. a maximum of 30% of a charter operator's annual IFQ may be leased; up to 10% may be leased to commercial sector after August 15; up to 30% maybe leased to charter sector. (allows mop-up by either sector)

Block restrictions - allow splitting of commercial blocks to transfer a smaller piece to the charter sector - split blocks retain original designations.

Vessel class restrictions - from A, B, C, and/or D commercial vessel category sizes to charter sector, except that no charter business may hold more than 1 "D" category block equal to or above the sweep-up level.

Issue 4. To receive halibut QS and IFQ by transfer:

For the charter sector, must be a permit holder or sign affidavit attesting that all legal requirements were met to participate in the charter fishery.

For the commercial sector, must have a commercial transfer eligibility certificate⁸.

Issue 5. Caps

1. use cap for charter QS holders only of 1 percent of combined charter and commercial QS units in Area 2C and ½ percent of combined QS units in Area 3A (for all entities, individually and collectively) and grandfather initial issues at their initial allocation.
2. use caps for charter QS holders only of ½ percent of combined charter and commercial QS units for combined Areas 2C and 3A (for all entities, individually and collectively) and grandfather initial recipients at their initial allocation

Issue 6. Miscellaneous provisions

- ~~Maximum line limit of 12 in Area 3A (remains at 6 lines for Area 2C), grandfather⁹ initial recipients at maximum lines in 2005, however, line limits in excess of the maximum are non-transferable.~~
- ~~10% underage provision of total IFQs allows carry-over to next season.~~
- A one-year delay between initial issuance of QS and fishing IFQs to allow reaction to initial issuance to match clients to QS prior to first season under program.
- Halibut harvested aboard a charter vessel continues to be the property of the angler who caught the halibut provided the charter owner possesses sufficient IFQ.

⁸ All commercial rules apply to any provision that may permit the use of commercial QS/IFQ for commercial purposes by any entity in the Charter IFQ sector

⁹ A business whose permit is endorsed in excess of the permit endorsement maintains that exemption for those that remain in its control after others may be sold, but those sold vessels lose that grandfather status in perpetuity. Grandfathered vessels that are sold in total when a business owner sells his entire business/fleet maintain that grandfathered status.

Issue 7. IFQs associated with the charter quota shares would be issued in numbers of fish based on 5-year rolling average determined by ADF&G).

Issue 8. Reporting:
Placeholder for NOAA Fisheries Service

Issue 9. Community set-aside (trailing amendment for which communities would be included)

COMMITTEE DEFERRED ACTION, except for strike-outs below

- a. Set aside 1% of the combined commercial and charter halibut quota to communities with ¼ percent annual increases if utilized, to a maximum of 2 percent.
- b. Source of the set-aside: Equal pounds from the commercial and charter sectors.
Option : proportional to split between sectors
- c. Sunset provisions: 10 years (starting in the first year of issuance). Persons currently participating in the set-aside program at the time of sunset would be allowed to operate within the guidelines of the program.

~~Option. Exclude communities from GOA FMP Amendment 66 list using the following criteria::~~

- ~~1. within 20, 40, 60, 80 nmi of major charter port or~~
- ~~1. more than 10-50 charter trips (any species) per year during 2004-2005 listing that community as port of landing~~
- ~~2. 1-5 number of charter (any species) businesses active in a community~~
- ~~3. See Alternative 2, Issue 6 Communities for Stakeholder Committee list of communities that may result from the above criteria~~

APPENDIX

Issue 4. Mechanisms to finance compensated reallocation to the current charter sector to allow for growth

- Option 1. State charter stamp
- Option 2. Allow private entities to purchase commercial QS/IFQ through fundraising, grants, donations, etc.) and convert to charter allocation; lease back unused allocation at end of year (part of KACO plan)
- Option 3. Business Improvement District (tax on trips dedicated to certain purpose)
- Option 4. Funds from compensated transfer of unused charter allocation back to commercial sector
- Option 5. Allow State to hold IFQs in trust through State bonds (similar to bonds issued recently for construction of State hatchery)
- Option 6. Federal funding/grants/stamp to fund entities to purchase QS and convert to charter allocation

X = did not testify

Public Testimony Sign-Up Sheet

(1)

Agenda Item C - (F) Halibut Charter
PERMANENT SOLUTION

	NAME (PLEASE PRINT)	AFFILIATION
1	Bob Alverson / Erik Knutsen	FVOA-Seattle -
2	Dan Hull	CDFW
3	Bill Lindous	commercial fisherman
4	Kert Bergman	Seaford Producers Coop
5	Stewer Flay	Anch F&G Advisory Committee
6	Carter Hughes	AK Fisherman Hd IFQ holder
7	Walt Pasternak	2C/3A fisherman
8	GREG SUTER Bob Howard	ALASKA CHARTER ASSOC.
9	Matt Hockema	CHARTER
10	Cole LaDuke	2C-3A fisherman
11	DONNA BONDIOCI	Charter
12	BUTCH SIMMS	" "
13	PETE WEDIN	" "
14	STEVE ZERNIA	
15	KEN L. LARSON	SAMTY CHARTERS
16	David King	Charter
17	Ridley Geese	KRBA
18	Sherry Kolarik	Sport
19	DONNA BONDIOCI	CHARTER
20	Tom Ohaw	charter - Sitka Charter Boat Owners Association
21	Nick Nekeferoff	Fisherman 2C, 3A
22	Jim Norris	Hemlock Ridge Charters
23	Tina McNamee	Charter
24	Linda Behnken	ALFA
25	Dave Falls	GOAC

Yes

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

P.2

C-1 (F) Halibut Charter -
PERMANENT SOLUTION

	NAME (PLEASE PRINT)	AFFILIATION
1	GREG KERNE	FISH CHARTER
2	DENNIS HAWKS	Puffin Fishing Charters / IFO
3	KEITH KALKE	CHARTER
4	Matt Kye	charter
5	John Goodhand	Valdez-Whittier Charter Assoc.
6	Bob Candopoulos	Charter
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

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

Issue 4: Proposed Finance Mechanisms

northern economics

- **State Charter Passenger Stamp**
 - A possible solution when combined with a debt instrument. Recent example in the funding of new state hatcheries through bonds and license fees. However, ADF&G staff indicated that there could be legal barriers.
- **Private Entity Purchase with Lease Back Provision**
 - A major alternative to a state-supported financing system. Can it overcome the free rider problem? Committee suggested a regional marketing association format. ADF&G unsure about legality.
- **Business Improvement Districts (BID)**
 - Public BID is likely infeasible as it would require public voting in each community and tax businesses not related to the charter fleet.

Issue 4: Proposed Finance Mechanisms

northern economics

- **Compensated Transfer of Unused Allocation**
 - Idea would be to allow the charter sector to lease unused halibut back to the commercial fleet in-season.
 - 2006 consumption estimates raise doubts about amount left to transfer back to the commercial fleet.
- **State Bond Sale**
 - Debt instruments need to be combined with a revenue source such as a charter passenger stamp. As previously noted, Wall Street responded positively to bonds funded through recreation fees.
- **Federal Funding**
 - Federal funding is always a possibility, but key informant interviews indicated that it's getting harder to compete for discretionary dollars.

Issue 5: Permit Classes

northern economics

- **Permit Classes are designed to reduce latent capacity by eliminating marginal players**
 - Stakeholder committee members asked for an analysis of the potential for options to reduce latent capacity
 - Committee members also asked for analysis of what type of business in the industry was actually generating growth. Is it smaller players or established businesses?

Issue 6: Share Based Permit Assignment

northern economics

- **June 2006 document looked at controlling effort through permits limiting trips, rod endorsement, or through limiting client days.**
- **Stakeholder committee recommended dropping the trip option and the rod option as neither by themselves provide a complete control on effort.**
 - If the number of trips are controlled, then operators will likely increase the number of rods on board.
 - If the number of rods are controlled, then the operators will likely increase the number of trips or take more passengers than can fish at any one time.

Issue 6: Share Based Permit Assignment


northern economics

- **Angler/Client day limits provide a higher level of effort control than rods or trips separately.**
- **Angler days could form the basis of a share-based program or could be a limit unto themselves.**
 - Yearly number of angler days deriving from a number of angler day shares.
 - A set number of angler days based on history (a cap based on data).
- **Stakeholder committee member raised several questions about this system.**
 - Would this system result in pressure to target more species or would there be greater overall control on pressure?
 - Would the system force charter anglers into the unguided sector?


Halibut Charter Allocation Issues Discussion Paper

Presentation to
North Pacific Fishery Management Council

Jonathan King
December, 2006




Overview




- White Paper discusses six topics from agenda item C-1(f)(1)
- Allocation Discussion Issues**
 - Availability and Quality of Charter Halibut Data
 - Alternative 2's Sector Allocation Formulas
 - Sub-area Allocations
 - Finance Mechanisms for a Compensated Transfer
- Share-Based System Discussion Issues**
 - Permit Classes
 - Permit Systems
- Discussion in the paper does not reflect new harvest estimates or October 2006 stakeholder committee discussions.

Issue 1: Availability & Quality of Charter Halibut Data



Priority Data	Allocation per Qualifying Year	Effort-Based Transferable Seat Program (Share System)	Collect New Data
<ul style="list-style-type: none"> Based On Previously Collected Data Addresses Longevity Issue Priority Data May Be Representative of Past Success Data bases have been discussed 	<ul style="list-style-type: none"> Based on Previously Collected Data Addresses Longevity Issue 	<ul style="list-style-type: none"> Provides more complete control of overall effort Recognizes the halibut charter fleet harvest multiple species 	<ul style="list-style-type: none"> New data collection techniques may address old base issues (Inconsistency) includes all current operators Ability to design a system which can work with other management components
Negative Aspects			
<ul style="list-style-type: none"> Will include businesses who did not catch halibut but reported bottomfish effort Will exclude businesses who failed to report bottomfish effort, even if they were not required to (caught salmon while targeting halibut) Magnitude of these Effects is Unknown 	<ul style="list-style-type: none"> Does not include or reward business success May be less desirable to successful industry members May be more vulnerable to cheating 	<ul style="list-style-type: none"> Data may not be available (To be clarified) 	<ul style="list-style-type: none"> Potential time delay in collecting data Does not inherently address the longevity issue May be vulnerable to cheating depending on the type of data collected New bases may be unknown


Issue 2: Allocation Formulas



Option	As Written In Alternative	Fall Meaning
1a	125% of average harvest of 2000-2004, translated to percentage	The charter industry's percentage is equal to 125% of the Charter Industry's Harvest from 2000-2004 translated into a percentage of the combined charter/commercial catch during the same period
1b	equal to the 1993-99 GHL translated to percentage	The charter industry's percentage is equal to the 1993-1999 GHL translated into a percentage of the combined charter/commercial catch during the same period
1c	percentage of combined 2004 commercial/charters catch	The charter industry's percentage is equal to their percentage of the combined 2004 commercial/charters catch
1d	Convert current GHL into percentage based on 2004	The charter industry's percentage is equal to the current GHL as a percentage based using 2004 combined commercial/charters harvest
2a	Update GHL to 2000-2004	The charter industry's Allocation would be an updated GHL reflecting 2000-2004 biomass estimates and IPHC observations
2b	Equal to the 1993-1999 GHL	Keep the GHL at its current level


- While the purpose of the paper was to focus on the formulas themselves enough data exists for an initial analysis.

Issue 2: Discussion from Allocation Formulas



- Percentage allocations are more flexible than poundage allocation. However, while the charter sector would benefit when biomass was increasing, they face greater risk if biomass declined.
- None of the formulas would provide Area 2C with "extra" unutilized halibut. In fact, only Option 1a would provide halibut equivalent to 2005 usage levels. The other options would provide less halibut than the sector used in 2005.
- For Area 3A, options 1a, 1b, and 2a would provide the sector with an allocation above 2005 usage levels. This halibut might be used for compensated transfer back to the commercial sector to generate revenues which might fund the reallocation. The other options provide amounts roughly equivalent to 2005 levels.

Issue 3: Sub-Area Allocations



- Area vs. Sub-Area Management**
 - Potential for increased enforcement, monitoring and management costs.
- Sub-Area Definitions**
 - Methodology of Sub-Area definition matters. For example, defining sub-areas by fishing grounds could cut communities off from traditional fishing areas.
- Sub-Area Growth Rates**
 - Sub-area allocations can be tailored to local growth rates. However, this aspect could be controversial, because the size of the pie is fixed and giving extra to one sub-area means taking away from another.

Public Comments for all C-1 Items

Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone 907-586-6652

Fax 907-523-1168

Website: <http://www.seafa.org>



E-mail: seafa@gci.net

November 20, 2006

North Pacific Fishery Management Council

Stephanie Madsen, Chair

605 W 4th Ave., Suite 306

Anchorage, AK 99501-2252

Sent by Fax 907-271-2817

RECEIVED
NOV 24 2006
N.P.F.M.C.

RE: Halibut Charter Issues C-1 (a-f) and Staff tasking D-5

Dear Stephanie Madsen, Chair; and Council Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a non-profit multi-gear membership based fishing association representing our members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. Most of our members are involved in the halibut quota share fisheries of 2C and 3A.

C-1 (a) 2005 GHL Status Report

At the Stakeholder meeting, ADFG staff was questioned about the 2005 GHL status report and why 3A skipper and crew fish were listed separately. This was the first that we had heard that skipper and crew fish might not affect the GHL for the charter industry. We believe that this raises several questions that the Council should consider. Where are the skipper and crew fish being accounted for? If they are accounted for in the unguided sport portion of the Saltwater Harvest Survey (SWHS) do individuals show up with more than 25/50 or 100 fish a year and is that expanded out sufficiently to encompass the charter industry? How did several NPFMC analyses over the last 13 years not recognize that a prohibition on skipper and crew fish would not affect the Charter GHL?

The stakeholder group was not informed that the actual commercial harvest and the ADFG estimated combined sport, subsistence and charter halibut fishery with the other removals exceeds the total CEY that IPHC had set for 2C and 3A. We believe that exceeding the CEY actually moves the halibut charter discussion into the conservation arena.

C-1 (b) 5-fish annual limits

We are concerned about the issues that the 5-fish annual limit discussion paper raises. The issue that is not stated but concerns us is that all the tools that the Council has discussed over the past 13 years will all face the same issues as a five fish annual limit and therefore leaves the council only one option to deal with the GHL overages and the associated conservation concerns that now exists in both 2C and 3A for the 2007 season.

The only option that SEAFA has been able to pinpoint as a possible method to constrain the growth in the charter industry as the moratorium and long term solution moves forward is adjustments to the bag limit. This can be done either by writing a letter to the IPHC for consideration at their annual meeting requesting a change to the bag limit for charter operations or the Council starts action on an emergency rule to change the bag limit for the charter fleet for the 2007 season. We now know that the prohibition on the skipper and crew fish while it might restrict the total harvest of halibut does not affect the charter's GHL as set by the Council.

We would hope the Council will take the appropriate action to direct IPHC to affect the charter industry only so that IPHC does not have to effect the unguided resident sport fisherman's bag limit. We would support other options if they exist that will constrain the charter harvest to the GHL as promised by the Council at the Dec '05 and April '06 meetings while the long term solution is developed.

SEAFA does not support the Council at this time rescinding the 5-fish annual limit but believes that it should be left on the table at this time as a future option when the State has changed it's laws to allow the sharing of charter data and the cross deputizing of NOAA OLE officers and Alaska State Troopers.

C-1 (c) Halibut Act

SEAFA supports changes as outlined in Jay Ginter's discussion paper on amending the halibut act. We believe that in the long term solutions that are being worked on in the stakeholder group that under some of the scenarios that might be chosen, limited delegation to the state of bag limits, annual limits, prohibition of skipper and crew fish and slot limits, season length might be beneficial. To that end, it might be beneficial for the public if a joint Council & Board of Fish protocol meeting be held to discuss and refine some preliminary details on how such a delegation might work and what tools might be appropriate to be delegated.

C-1 (d) Separate Accountability

SEAFA supports separate accountability as an appropriate tool in the long term solutions. We do not see the tools at this time being available to implement separate accountability.

C-1 (e) Moratorium

SEAFAs agrees with the halibut charter stakeholder group that this should be a priority action for the Council. We support the recommended changes made by the halibut charter stakeholder panel and encourages the Council to accept the changes as recommended and to continue to make the moratorium a top staffing priority.

C-1 (F) Long term solution - allocation/shares

SEAFAs supports the recommendations of the halibut charter stakeholder committee and requests that you accept their recommendations and continue to make the long term allocation/share based plans a staff priority. To this end we would like to request that additional staff be assigned to this issue to help on the long term solution without taking away staff time and effort on the moratorium.

Other Halibut Charter comments

The commercial fishing community is extremely concerned about the amount of halibut that the charter industry is harvesting. The preliminary estimate for 2C for 2006 is 42-47% above the GHL the Council set in 2000 which had provided a 25% growth buffer. Phil Smith at a presentation at Pacific Marine Expo stated that the moratorium most likely won't be in place until the 2009 season and a long term solution would be several years beyond that. This is an extremely scary scenario for fishermen who have purchased halibut IFQ shares and in particular those fishermen who took out a loan to purchase quota shares. These fishermen are facing not only the loss of opportunity to fish the shares for yearly income, but are having to make loan payments on quota share value that has transferred to the charter industry due to their overage of the GHL.

For example: The State of Alaska Division of Investments (ADOI) has made 268 loans for a loan value of \$25,240,157 since the inception of the IFQ program. Fishermen have made 161 ADOI loans for a value of \$17,144,332 since 2001 when fishermen thought the Charter issue was settled and it was safe to buy. The average fisherman's loan amount borrowed since 2001 was for \$106,468. At an average value for quota share at \$14.00 pound, this equals 7605 pounds of quota share. (Quota share has been as low as \$8 and as high as \$22.) Assuming that the biomass stayed steady between 2006 and 2007 and the only loss to the fishermen's catch limit is the charter overage from 2006, his quota will go down approximately by 6% so he loses the ability to fish 456 pounds. At this years average price, (approximate guess of \$3.60) the fishermen loses income of \$1,641.60 and still has to pay his loan payment on the full value borrowed even though \$6,388.08 of that value was transferred to the charter industry which accounts for \$753.62 of their loan payment. This fisherman has lost to the charter industry \$2,395.22 which is the approximate equivalent of the pay for one crew member.

Remember the State of Alaska is only one lender, you also have the NMFS loan program, CFAB, private banks and lending institutions have many more loans out on IFQ's to commercial fishermen.

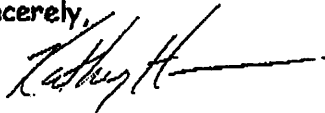
We hope the Council will encourage the State of Alaska to continue the prohibition of skipper and crew fish in area 2C and consider some limitation to skipper and crew fish in area 3A for 2007 while this process continues to move forward.

We hope that the Council will remember their motion from the April Council meeting made without objections, that stated, *"The Council compliments the Stakeholder Committee on its work and encourages it to continue. As part of its plan to develop long-term solutions, the Council urges the Committee to consider a package of a modified GHL that moves with abundance, some form of separate accountability, and the provision of the proper management tools to management agencies so that each sector of the halibut fishery can be managed not to exceed its allocation. In the meantime, the Council commits to using a combination of Federal and State authority to manage each sector, charter and commercial, to the allocations established by the GHL published in the Federal Register until superseded by the Council's long-term guided sport halibut sector plan."* The Council has the ability at this meeting to make good on this promise by 3 actions:

1. Implementing an emergency regulation to lower the bag limit (or some other alternative that constrains the growth of the charter harvest) for the charter industry for the 2007 season. This action will allow the bag limit to affect the charter industry and not the unguided sport fisherman. Or the Council could request the IPHC to lower the bag limit for the charter industry - this path may affect the unguided sport fishery if the IPHC is not able to set separate regulations for the two sectors.
2. Accept the stakeholder's recommendations on the moratorium/limited entry program and continue to fast track the process in staff tasking.
3. Accept the stakeholder's recommendations on the long term solution (allocation/share-based) and add additional staff or resources to this alternative in the staff tasking so that it may also move forward as quickly as possible.

Thank you for your consideration of our views.

Sincerely,



Kathy Hansen
Executive Director

Dear Ms Madsen, I am a Halibut IFQ HOLDER. I am concerned about my IFQ'S being reallocated to the sport charter industry. I purchased most of my IFQ'S with loan's from NOAA. Im still paying on these loans for many years to come. I purchased Halibut ifq's knowing there would be stability in this fishery. I didnt expect the charter fishery to chip away at my investment. For 13 year's our industry has asked the council to stop this open-ended allocation from the commercial to the charter industry. Action need's to be taken to protect our investment and future in Halibut fishing.

Sincerely, Vern Jamison

RECEIVED

NOV 13 2006

N.P.F.M.C.

11/15/06

Chair Stephanie Madsen
NPFMC 605 West 4th St
Anchorage AK 99501

RECEIVED

NOV 22 2006

N.P.F.M.C.

Dear Ms. Madsen:

I am a sport fisherman from Southern California. As I understand it, a proposal has been made to cut the limit for halibut to 1 fish.

I travel all over the country, as well as internationally, to fish different species.

A one fish limit, however, would preclude me from coming to Alaska to fish. The commercial boats already take 85% of the catch. That's enough!

Sincerely,

Kevin Donahue
Mission Viejo, CA



RECEIVED
NOV 22 2006
N.P.F.M.C.

Chair Stephanie Madsen
NPFMC 605 West 4th Street
Anchorage AK 99501

Dear Stephanie,

I am sad to hear that there is talk about lowering the limit of charter caught halibut to one fish per day. Please do remember that we have to spend a lot of money to fish Alaska and a one fish limit would take Alaska off my list of fishing destinations!! Please reconsider this change.

Dennis Hytinen

To: Chair Stephanie Madsen, NPFMC 605 West 4th Street
Anchorage AK 99501.

RECEIVED

NOV 22 2006

N.P.F.M.C.

Council members,

It would be ludicrous to limit the private charter fisherpersons daily take limit to one halibut , when it is a fact that the depletion of the fishery could only be due to the commercial fleet.

Eighty five % or more of the halibut taken in Alaskan waters is by commercial boats.

This type of unfair regulation can only be bought.

Do you want the rest of the nation to believe that you were bought?

If this action is taken I will no longer travel to Alaska .

I can do much better in Canada.



Tim Gunter
Carlsbad , Ca.

TO;
North Pacific Fishery Management Council
11/21/06

RECEIVED

NOV 24 2006

N.P.F.M.C.

From:
Steven D Ellis, Gen Mgr
Alaskan Gold Seafood Inc
PO Box 806, Soldotna AK 99669

Re:
Dec 12 2006 Meeting and the issue of Halibut Charter allocation and other halibut management concerns.

Members of the Advisory Panel;

As a buyer of Halibut, I have a stake in a consistent, high quality supply of halibut for my customers.

I wish to say that the change to the quota system has been an improvement over the old "derby" fishing. That is to say, I am generally pleased with the system as it exists from my marketing standpoint.

I perceive the fishery as fairly managed and based on science with fair consideration of most gear groups. I believe I am in the majority on this.

My concerns are twofold, one of which is an important personal one

First :

If a per-person limit is applied to Halibut charters, what unintended consequences will arise??

Obviously many charter fishermen are after trophy fish, so will the release of more smaller fish cause increased mortality? There is reason to believe that the limit could actually be counterproductive of protecting the stock. Info is sketchy but it is possible the two king limit in the Kenai River may actually be causing higher mortality. An unintended consequence.

Second :

Halibut feeds my family. I do sport fish for halibut, but it is our major source of protein that we derive from our environment.

I am not alone in valuing this food source. It seems sport/personal users are not well represented with all the loud concern of the various commercial interests.

It is possible the personal/sport use group could be ignored.
I would appreciate your consideration of this in your management.

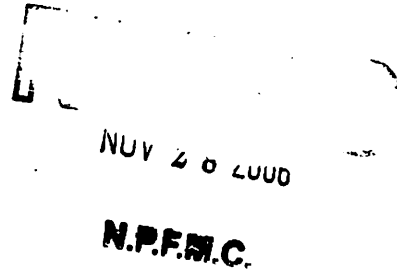
Regards

Steve Ellis

**TO: MS Stephanie Madsen, Chair
NPFMC
605 West 4th Ave, Ste 306
Anchorage, Alaska 99501**

**FROM: Dennis Petre
Petre's Fishing Charters
Valdez, Alaska 99714
907-322-6392**

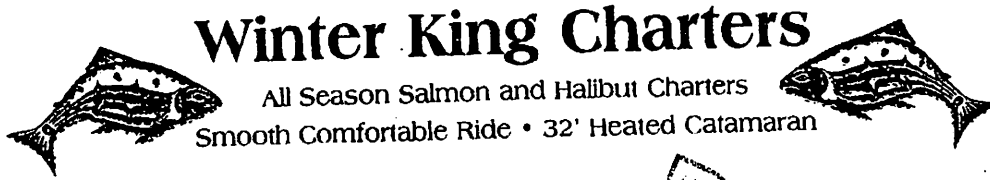
Subject: Halibut Charter Management



I am writing in response to some of the suggestions that I have heard about the different Halibut Plans.

1. I am against the 1 fish per person per trip idea. Most of my customers are residents and they would not pay to go fishing for just one halibut. The one fish plan would put me out of business. I would prefer that a yearly fish ticket be used for all sport fishing including those that are not going on charters. The ticket would sell for \$5 per person and all anglers would have to have one regardless of age. The ticket would have the date the fish where taken and the number. I suggest that a non resident could take up to 4 halibut per season and a resident up to 10 per season. The halibut charters would then track the tickets when the customers get on the boat.
2. If a limited entry plan is put in a buy out plan should also be put in to remove some of the charter boats that are in service. The limited entry permit should be transferable to a boat with the same numbers of rods allowed.
3. I believe the management of the sport caught halibut should be managed by the State of Alaska.

**Dennis Petre
Owner Petre's Fishing Charters**



North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 23, 2006

RECEIVED
NOV 24 2006
N.P.F.M.C.

Members of the North Council:

I am writing to you today regarding the permanent solution to recreational charter halibut management.

As a member of the Stakeholder team, I continue to work with team members and staff to develop options for a long term solution. At present, two models are emerging from the Stakeholders, both awarding QS or angler days based on the past histories of moratorium permit holders. While both of these plans address issues of fairness in initial allocation, they both still amount to a giveaway of a public trust resource. There will be a value to each operator's allocation, comparable on a per pound basis to commercial IFQs, which will serve as a barrier to new entry, growth and for that matter, sale of an existing business. There are no guarantees that the initial allocation will be sufficient to allow shareholders to operate at their historical levels. Additionally, when the biomass decreases, yearly poundage allocations will shrink, requiring operators to scramble to purchase more QS just to maintain their current level of clients.

Today I am enclosing the latest iteration of a proposal that manages the recreational charter sector using a simple first come, first served model. Here are some key features:

This proposal manages the harvest within an allocation, *with no in-season or post season management actions required*; its single operating premise is that ticket sales stop when there are no more available tickets.

This proposal contains options for an inter-sector catch sharing plan, allowing for dynamic, in-season growth of the recreational allocation via IFQ leasing, as well as end of season mop up of recreational underages by the longline sector. This minimizes the need to ever cease ticket sales, while fully utilizing the resource.

This proposal provides for a permanent, compensated allocation shift via QS purchase.

This proposal works with any size allocation

This proposal works with or without a moratorium.

This proposal does not gift a public trust resource to a privileged few.

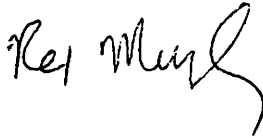
Rex Murphy owner/operator

P.O. Box 3309 • Homer, AK 99603 • 907-235-9113 • www.winterking.com

Today the necessity of managing the charter sector within an allocation and the need for a compensated allocation adjustment mechanism are more painfully obvious than ever. We need to resolve this issue once and for all, but we must take the time to do it right the first time. Members of the longline sector like this proposal and have indicated a willingness to work with the charter sector on a catch sharing plan. Please take a hard look at this proposal and consider including it for analysis along with the other permanent solution options.

As always, your questions, comments and suggestions are appreciated.

Sincerely,



Rex Murphy
Winter King Charters
rbmurphy@ptialaska.net
www.winterking.com
907-235-9113

November 24, 2006

First Come, First Served, Allocation Based Model

Key Provisions:

1. Halibut Harvest Tickets:

- A. Tickets are available to individual fishermen on a first come, first served basis, online, by mail, or by point of sale terminals.
- B. Tickets are available to the public in increments.
 - Option 1: Daily ticket, good for one limit on any day
 - Option 2: Multi-day ticket, good for a set number of fish
 - Option 3: Yearly ticket, good for a set number of fish
- C. Tickets are non-transferable, to enforce reporting requirements and eliminate possibility of hoarding or scalping.
- D. Tickets are refundable if not used.
- E. A portion of the following year's allocation could be made available early, to accommodate charter reservations made that far in advance.
- F. When all tickets have been sold (i.e. allocation is met):
 - Option 1: Cease ticket sales
 - Option 2: Lease IFQs using user fee fund, continue ticket sales
 - Option 3: Buy QS using user fee fund, continue ticket sales

2. Harvest Record:

The harvest ticket could incorporate a harvest record, which should be simple to fill out and should be machine readable. It might include fish length and capture location. Upon trip completion, the harvest record is submitted to the responsible authority.

- Option 1: No harvest record, no data collection
- Option 2: Mail in reporting
- Option 3: Online harvest reporting
- Option 4: Dockside scan of harvest record

Option 5: Dockside collection boxes

3. Halibut Management Database/User Interface:

- A. Issues Halibut Harvest Tickets online, by mail, or via point of sale terminals.
- B. Maintains a real time count of tickets available. This information should be easily accessible online or via telephone for trip scheduling purposes.
- C. Collects and records harvest records
- D. Generates reports as necessary

4. Entry model:

- Option 1: Open Entry
- Option 2: Limited Entry (by moratorium, for instance)
- Option 3: Open Entry in underdeveloped areas, Limited Entry elsewhere

5. Enforcement:

Officer checks for fishing license and dated harvest ticket in possession.

6. Allocation: in effect and separate for Areas 2C and 3A:

Option 1: Allocation for private and charter halibut fishery
With this option, all recreational fishermen would be required to obtain Halibut Harvest Tickets and regulations would not vary between charter and private recreational fishermen.

Option2: Allocation for charter halibut fishery
With this option, only charter customers would be required to obtain Halibut Harvest Tickets.

7. User Fee Fund/Allocation growth:

An entity is established to collect ticket fees or other available funding (e.g. grants, bequests, bond sale proceeds) and manage compensated temporary or permanent allocation increases via:

- Option 1: Purchase of Commercial QS
- Option 2: In-season leasing of Commercial IFQs.

Sample Timeline:

Note: The dates are inexact, but the idea is to have accurate, timely decision making data from all sectors available at allocation decision making time.

December: The charter allocation is set for following year, based on initial allocation, QS acquired, and that year's harvest data. The total number of halibut harvest tickets offered = (Allocation converted to Fish)/daily limit.

January: Ticket sales begin (or continue – see provision 1E) on a first come, first served, basis to individual fishermen. At all times, the number of available and sold tickets is known, and available to all online for planning purposes. Harvest tickets should be acquired concurrently with charter reservations.

February 1: The recreational season opens. Each fisherman has a harvest ticket in possession while fishing. The ticket holder goes fishing, dates harvest ticket, catches fish, fills in the required harvest information and submits harvest report. No report: 2 average fish added to harvest count. Report with 0 or 1 fish caught results in 2 or 1 fish being returned to the available pool.

Mid-season: Should the allocation be met (i.e. all tickets have been sold):

- Option 1: Cease ticket sales. Note that fishing can continue, assuming there are still unfished tickets.
- Option 2: Lease IFQs using user fee fund to allow continued ticket sales.
- Option 3: Purchase QS to permanently increase allocation.

October 15: The recreational season ends. Any uncaught charter allocation could be leased to longline sector as a mop up to fully utilize resource and to supplement the user fee fund.

November 15: End of commercial season

Nov 15 to Dec 15: Analysis to determine next year's allocation

Comments:

Note that in this model, there is no need for in-season management measures such as closure or limit reduction, since sales are either halted automatically or leasing begins with continued ticket sales when the allocation (in fish) is met.

Assuming the average size fish does not change drastically upward from year to year, there is little possibility of exceeding the allocation. If the allocation is exceeded due to an average size increase, the excess could be deducted from the following year's allocation.

This model provides security of investments and allocations in both commercial and charter/recreational sectors.

The recreational fishermen who catch the fish share the cost of their share of the harvest, and fund programs to enhance the fishery. This concept is similar to the Salmon Stamp program.

A first come, first served model for ticket distribution should be readily acceptable to a charter customer, who after all, makes his charter reservation on a first come, first served basis, and indeed, stands in line for virtually everything else he or she buys.

Entry Model:

In an open entry model, charter operators would be free to compete for customers, as they do today, and new operators would be allowed. There are no new financial barriers to new charter businesses in the open entry model.

In a limited entry model, for example a permanent extension of the proposed charter moratorium, the cost of moratorium permit acquisition would be the only additional direct financial impact to a new charter operator.

The open entry model would convert easily to limited entry in areas where limited entry is later deemed necessary, by adoption of a localized moratorium.

Allocation:

A mechanism for compensated, orderly growth of the charter allocation is absolutely essential for this model.

A reasonable allocation would be enough to accommodate all expected demand, with an additional buffer to accommodate unexpected demand or unexpected size increases.

A low allocation could result in mid season closing of ticket sales, which would adversely impact businesses with a "walk up" business model. Businesses with advance reservations would not be affected, assuming the customer acquired his harvest ticket when the reservation was made.

Assuming adequate funding, an inter-sector catch sharing plan that allowed dynamic in-season IFQ leasing could minimize the need to ever cease ticket sales.

Data Collection:

This model could incorporate accurate and timely reports of harvested fish. All sectors finish reporting more or less concurrently, allowing fast calculation of this year's harvest and next year's allocations, without the use of projections or survey results.

Alternatively, the no data option still manages the catch to a number guaranteed to be less than or equal to that year's allocation in fish. In this case the only other data required for yearly calculations would be the average fish weight.

Items needing resolution:

Fee collection: Federal, and or State legislation would be required to allow fee collection for other than administrative purposes.

QS purchase/IFQ leasing: The existing IFQ program would require modification to allow purchase of QS or lease between sectors by whatever entity is created to manage this part of the allocation.

Nov. 29th, 2006

North Pacific Fishery Management Council
Dec. 6-12, 2006
Halibut Charter Options

RECEIVED

NOV 28 2006

N.P.F.M.C.

Dear Council Members,

As a Recreational fisherman and Charter operator I do not want any form of commercial IFQ's or Permit endorsements pushed onto the recreational sector.

I do think a Limited entry permit system is necessary until catch data is accurate.

I do want all federal fisheries management decisions to meet "all" the criteria found in the Ten National Standards listed in the Magnuson-Stevens Act and follow Executive Order 12962, from President Clinton and President George W. Bush "to increase recreational fishing opportunities and follow Dr. William T. Hogarth's directive to "revitalize our recreational fisheries program."

Sports fishermen need a fair & equitable allocation of the resource with regards to the highest and best use for the American public's benefit.

Wastage and bycatch mortality resulting from commercial operations need to be part of the solution.

Sports fishermen need fair and equitable representation on the Council and Advisory Panel for the recreational fishery, which includes both the charter recreational/sport and the non-charter recreational/sport fishery.

As a charter operator I do not catch Halibut, sports fishermen do, I am just a vehicle operator, no different than a taxi-cab. Why should I be given a part of the resource that really belongs to the public (sports fishermen).

Thanks,

Frank and Jan Casey
Alaska Wildrose Charters
PO Box 343
Clam Gulch, AK. 99568
907-252-4525

RECEIVED

NOV 29 2006

N.P.F.M.C.

NPFMC
605 W. 4th Ste 306
Anchorage AK 99603
November 28, 2006

Dear Chairman Madsen and Council Members,

I have contacted all other Fisheries Management Councils. All indicate a balanced or nearly balanced composition. And, all stipulated a reasonable harvest percentage of species have been reserved for non-commercial users of shared resources through their FMP's.

I have reviewed NPFMC proceedings for the past fifteen years (minutes as well as AP proposals and implemented programs). While noting that the North Council is inordinately out of balance (in conflict with Magnuson-Stevens) it is NOT surprising that all proposals and subsequent programs have been severely skewed to favor commercial fishing while supporting monopolies and precipitating mismanagement, greed and resource loss as by-products. Don't pretend it hasn't happened.

Years ago, before Halibut rationalization and Commercial IFQ's, I would watch the off-loading of Halibut. Every size and shape came over the dock. Harvests were limited to "openers", but every pound had value and was sold. Now, with extended fishing seasons, every fish over the dock is a high dollar product! The obvious difference is wholesale upgrading by longliners. Further, I've spoken with fishermen from SE Alaska who declare that the extended season allows longliners to target the spawning beds to access the "more valuable", larger fish. These practices to maximize today's revenue while forcing the Halibut biomass into decline.

Your Crab rationalization program is an obvious disaster and everyone knows it. And now, you want to assign exclusive harvest privileges for other groundfish species to commercial fishermen as well.

When I reviewed your agenda for the Dec. '06 AP and Council proceedings, I was appalled at the percentage of attention to be given to the Charter fishing removals. Of all the user groups, charter clients are the most closely monitored and cleanest consumers. Targeting their small percentage is ludicrous! Longliners simply want a larger percentage of the TAC to target, abuse and eventually destroy.

Get the Council house in order! Observer programs are costly and ineffective. With today's cost efficient technology, fishing sites could be documented by time and GPS overlap and all removals could be documented via video recording. Failure to be in compliance should result in substantial fines and forfeiture of quota.

I feel I must state the obvious. Choosing to ignore public input only strengthens the validity of our complaints when these programs are referred to Federal Court for Scrutiny.

Sincerely,



Dr. John Bondioli, Sport Fisherman
PO Box 66
Homer, AK 99603

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED
NOV 17 2006

N.P.F.M.C.

Subject: Sport fishing Moratorium Considerations

I am a sport fishing enthusiast who has, in recent years, added the Alaska experience to my vacation options, hence my interest in your management policies. I have recently been made aware that the North Pacific Fishery Management Council is in the process of continuing its effort to allocate the halibut fishery amongst the users of this valued public resource and the Council is contemplating a moratorium on sport charter fishing.

I assume that through the federal legislation, that this public resource is managed by you under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available stock that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. (A permit I assume means that it is subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion

A moratorium on the sport fishing industry via charter limitation is contrary to the public having access to its fishery. It is how the majority of the halibut sport fishing is done by the general public that do not live in proximity and have the luxury of owning a boat that is large enough to safely venture to the fish. I am one of those fishermen. (Sounds like an "anglers disability act" needs to be legislated to assure fishermen have safe access). It is not in the best interests of the American public to place its sport fishing access in jeopardy. The resource is not in danger of being over fished by the general public. It is my understanding that today, the sport fishing activities remove only 13% of the available fish, while the rest is taken by commercial fishermen. This is a significant imbalance in allocation that may have been appropriate in years past. The public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow.

It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. It is obvious that the resource is not in danger. It is improperly allocated given the public's desire to enjoy the resource.

It would be refreshing to see the North Pacific Fishery Management Council take a more proactive stance on assuring that the rightful owners, the American public, are allowed to continue to have access to a fair share of the fish. A 13-87 split doesn't make it. At last count, the general public is made up of 300,000,000 people.

Has the sport allocation kept up with the desired growth in public use?
If the answer is "no" let's fix it.

Sincerely,

Dave Coll
735 Sumner Ave, Suite 110
Roswell, CA 95661

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED
NOV 21 2006

Subject: Sport fishing Moratorium Considerations

N.P.F.M.C.

I am a sport fishing enthusiast who has, in recent years, added the Alaska experience to my vacation options, hence my interest in your management policies. I have recently been made aware that the North Pacific Fishery Management Council is in the process of continuing its effort to allocate the halibut fishery amongst the users of this valued public resource and the Council is contemplating a moratorium on sport charter fishing.

I assume that through the federal legislation, that this public resource is managed by you under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available stock that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. (A permit I assume means that it is subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion)

A moratorium on the sport fishing industry via charter limitation is contrary to the public having access to its fishery. It is how the majority of the halibut sport fishing is done by the general public that do not live in proximity and have the luxury of owning a boat that is large enough to safely venture to the fish. I am one of those fishermen. (Sounds like an "anglers disability act" needs to be legislated to assure fishermen have safe access). It is not in the best interests of the American public to place its sport fishing access in jeopardy. The resource is not in danger of being over fished by the general public. It is my understanding that today; the sport fishing activities remove only 13% of the available fish, while the rest is taken by commercial fishermen. This is a significant imbalance in allocation that may have been appropriate in years past. The public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow.

It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. It is obvious that the resource is not in danger. It is improperly allocated given the public's desire to enjoy the resource.

It would be refreshing to see the North Pacific Fishery Management Council take a more proactive stance on assuring that the rightful owners, the American public, are allowed to continue to have access to a fair share of the fish. A 13-87 split doesn't make it. At last count, the general public is made up of 300,000,000 people.

Has the sport allocation kept up with the desired growth in public use?
If the answer is "no" let's fix it.

Sincerely,



Steven W. Patterson
Louisville, Kentucky

November 20th, 2006



P.O. Box 2315
Homer, Alaska 99603
Phone 907-399-3980

To: North Pacific Fishery Management Council
From: Wild Alaska Charters, Homer, Alaska
Re: Moratorium proposals

REC'D
NOV 22 2006

N.P.F.M.C.

Charter Halibut Management;

My brother and I have spent several years preparing our boat, obtaining a Charter Captain License and everything needed to be a reputable charter business in Homer, Alaska. This has been a dream of ours since the early 1980's. We were ready to launch our business summer of 2005 when we lost an engine the first day in the water. We spent that summer raising funds and replacing an engine. We did launch our boat last summer and finally saw our dream become reality.

When considering a way to manage the halibut in Alaska waters, we do have to say that trying to place a moratorium in effect that would put businesses that are currently running out of business, just because of the year they started in, is unconstitutional! I would for see a large class action suit or several Law Suits. As for us, we will pursue a lawsuit should this one moratorium be chosen. There are other ways of managing the halibut catch in Alaska waters. Some suggestions would be:

1. Limit crew fish. This would limit the Halibut catch considerably!
2. Shorten the season
3. Put a size limit on the halibut that can be kept. Thus allow some of the larger egg laying halibut to live.

These are a few suggestions.

Sincerely;

Albert Washburn Co-Owner, Captain
Sherrie Dyroy Co-Owner
Wild Alaska Charters, Homer, Alaska

November 21, 2006

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252

RECEIVED
NOV 27 2006
N.P.F.M.C.

Subject: Sport fishing Moratorium Considerations
Members of the Council

I am a sport fishing enthusiast who has, in recent years, added fishing in Homer, Alaska as a fishing destination, hence my interest in your management policies. I have recently become aware that the North Pacific Fishery Management Council is in the process of continuing its effort to allocate the halibut fishery amongst the users of this public resource and the Council is contemplating a moratorium on sport charter fishing.

I assume that through the federal legislation, that this public resource is managed by you under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. I understand that the remaining available stock that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system.

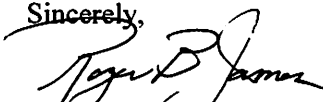
A moratorium on the sport fishing industry via charter limitation is contrary to the public having access to its fishery. It is how the majority of the halibut sport fishing is done by the general public that do not live in proximity and have the luxury of owning a boat that is large enough to safely venture to the fish. I am one of those fishermen. It is not in the best interests of the American public to place its sport fishing access in jeopardy. The resource is not in danger of being over fished by the general public.

It is my understanding that today; the sport fishing activities remove only 13% of the available fish, while the rest is taken by commercial fishermen. This is a significant imbalance in allocation that may have been appropriate in years past. The public sporting habits and abilities are changing. The desire for the Alaska fishing experience by people such as me is continuing to grow.

It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. It is obvious that the resource is not in danger. It is improperly allocated given the public's desire to enjoy the resource.

It would be refreshing to see the North Pacific Fishery Management Council take a more proactive stance on assuring that the rightful owners, the American public, are allowed to continue to have access to a fair share of the fish. A 13-87 split doesn't make it. At last count, the general public is made up of 300,000,000 people.

Sincerely,



Roger B. James
63 Ivy Drive
Orinda, CA 94563-4228

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

Subject: Moratorium Considerations on Sport Fishing

I am an avid sportsman and have thoroughly enjoyed several sport fishing trips to Alaska. These Alaska trips are some of the best vacations I have ever experienced. I have two young children and cannot wait to experience Alaskan Halibut fishing with them. I have recently been made aware that the North Pacific Fishery Management Council is contemplating a moratorium on halibut sport charter fishing. I am very disappointed in this news and urge you to not reduce the percentage of halibut caught by sport fishing enthusiasts on chartered boats.

American people have the first right for any resource. I hope that the Fisheries Management Council keeps this in mind while setting policy. I assume that through the federal legislation, halibut is managed under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available biomass that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. These permits should be subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion.

A moratorium on the sport fishing industry via charter limitation is not in sync to the public having access to its fishery. Moreover, it is not in the best interests of the American public to place its sport fishing access in jeopardy. If the North Pacific Fisheries Management Council limits charters they will also limit the access to me and other general public to have safe access to our fish, as we cannot afford to have a personal boat to allow halibut fishing access. This would truly be another American tragedy and twofold at that. We would loose access to halibut fishing but also the Alaskan economy would suffer as well. Every trip I make to Alaska costs a great amount of money. This money is spread all over town for lodging, car rental, fish processing, eating, etc. If you limit the sport fishing access via charter boat you will also make a significant negative economic impact for the people of Alaska by putting their livelihoods in jeopardy.

The halibut biomass is not in danger of being over fished by the general public. Apparently the sport fishing activities remove less than 15% of the available fish, while the balance is taken by commercial. There seems to be a significant imbalance in allocation. This allocation might have been appropriate in the past but it is no longer in balance as the public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow and the American people have the first right of any resource.

Recreation can take care of the resource management. I enjoy waterfowl hunting as much as I do halibut fishing. In fact, my family has a long history of waterfowl hunting, as my grandfather was a commercial hunter but had to change his career, as the American people wanted a larger share of their resource. Today, our waterfowl resource is doing wonderful and is properly managed via sport hunting. This is one model where regulations have properly managed an American resource. Other models where the commercial industries have had more than their fair share have ended in disaster as the commercial fishing industry has annihilated various species of fish. Please consider the track record of the commercial fishing industry versus the sport fishing industry that has had a healthy effect on our resources and economies.

It is obvious that the halibut fishery is not in danger. It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. The halibut take is improperly allocated given the public's desire to enjoy the resource. Please do not stop me and my family as well as other Americans from enjoying access to our halibut. The people's access and mass of halibut should be increasing, not decreasing. I urge you to help us.

Please feel free to contact me for any questions.

Sincerely,



Gary Lippner
3028 Panama Avenue
Carmichael, CA 95608

October 31, 2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 1 2006

N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHL, until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Robin A. Blake

Box 718

*Cordova, AK
99574*

Date: 10-31-06

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 2 2006

N.P.F.M.C.

Dear Ms Madsen,

Please help me save my hard earned investment and the one tool my kids have to try to afford college.

My Halibut quota is being eaten up by the charter fleet and I feel as though one day I will still be paying on an I.F.Q. loan for I.F.Q. that no longer exists.

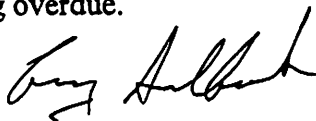
The charter fleet says it does not sell fish, just the fishing experience. If so, go to a catch and release format and see if they can still sell that experience!

The Council committed to managing the halibut charter fishery to the GHF until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHF. The 3A halibut charter harvest is now approximately 10% over the GHF. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Name

Gary Anlbach

Address

Box 726

19-Ak. 99833

NORTHERN KETA

ALASKA'S FRESHEST CAVIAR

2601 Channel Drive
Juneau, Alaska 99801

PH (907) 586-6095

FAX (907) 586-6094

stephanie@alaska.net
www.NorthernKeta.com

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 2 2006

N.P.F.M.C.

10/28/2006

Dear Stephanie,

As the halibut season comes to an end and we are taking stock I am also looking at what the charter fleet was up to.

It looks like they have exceeded the GHIL by quite a bit and this eroding the value of commercial quota share.

You and your colleagues did commit to managing the halibut charter fishery to the GHIL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHIL. The 3A halibut charter harvest is now approximately 10% over the GHIL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

It has been 13 years and I think it is time that you take action and DO something.

All those years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry.

I hope you will do something about this soon,
Thanks and best regards

Sissi Balich



Date: 10/30/2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 2 2006

N.P.F.M.C.

Dear Ms Madsen,

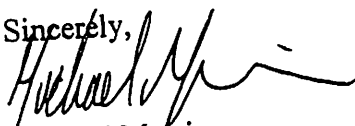
I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry. Specific easily accessible areas to charter fisherman within area 2C showed signs of over fishing in 2006 because they the charter industry is allowed to exceed the GHL.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Michael Morris
652 17th Avenue West
Kirkland, WA 98033

11/1/2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage , AK 99501
FAX (907) 271-2817

RECEIVED
NOV - 3 2006
N.P.F.M.C.

Dear Ms. Madsen,

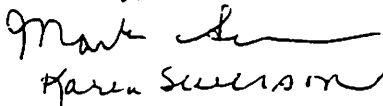
We are very concerned that the Charter Fishery has exceeded the GHL by 50% in 2C, and 10% in 3A, and that it will equate to a decrease in the commercial fishermen's 2007 IFQ.

This is unacceptable to the Commercial Fishermen. The value of our quota shares are eroding away. Had the Council done there job to address this last year, or the 13 years prior, this situation would not be what it is today.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

The Council has failed to implement a long term solution to date. Please find a solution and stop this open-ended reallocation of halibut from the commercial to the charter industry. Action is long overdue!

Sincerely,


Mark & Karen Severson

Mark & Karen Severson
F/V Odin
PO Box 1502
Petersburg, AK 99833

RECEIVED

NOV - 3 2006 November 5, 2006

Dear Ms. Madsen ,

N.P.F.M.C.

I am very concerned that the Charter Halibut Fleet has again exceeded its GHL and is eroding the value of commercial quota share.

The council is committed to manage the charter halibut fishery to the GHL. until a long term solution is implemented, this year the 2C halibut charter harvest is now 47% over the GHL. In 3A the halibut charter harvest is approximately 10% over the GHL. The council has failed to meet it's commitment to the commercial fleet at the expense of the commercial fleet.

I think IFQ's have worked well for the commercial fleet. we can have a business plan, build our business, and allow new entry. I am heavily financed in my Halibut Fishery and with the charter fleet unregulated and continually going over their GHL. and it then coming out of the commercial GHL level it is really hard to run a business.

The commercial fleet should not be penalized for the charter overages. the council and the National Fisheries Service need to effectively manage the charter section to stay within its allocation and adopt separately accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the council to stop the open-ended reallocation of halibut from the commercial to charter industry. Effective action is long over due.

Sincerely



Joe Short
P.O. Box 1224
Petersburg, Ak 99833
907-772-3585

Date: 11-04-06

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 3 2006

N.P.F.M.C.

Dear Ms Stephanie Madsen,

The halibut charter fleet has again exceeded the GHL and is diminishing the value of my commercial quota share.

The Council promised to manage the halibut charter fishery to the GHL. This year the 2C halibut charter harvest is close to 50% over the GHL. The 3A halibut charter harvest is about 10% over the GHL. The Council has not kept its promise to the commercial fishing industry.

The commercial fleet should not be penalized because the charter fleet exceeds its GHL. The National Marine Fisheries Service and the Council need to manage the charter sector to stay within its GHL allocation and adopt **accountability separate** from the commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Please resolve this issue and end the redistribution. Thank you.

Sincerely, *William Connor*

William Connor

Box 1124 Petersburg, Alaska.
99833

November 1, 2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 6 2006

N.P.F.M.C.

Dear Ms Madsen,

The halibut charter fleet has exceeded the GHL again. This of extreme concern to the commercial IFQ fleet as it is eroding the value of our quota shares.

The Council has failed to meet its commitment to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL

The commercial IFQ fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Steve Jangaard
5017 168th PI NW
Stanwood, WA 98292

Date: 11/13/06

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV 13 2006

N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHF and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHF until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHF. The 3A halibut charter harvest is now approximately 10% over the GHF. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Pete T. Thompson

Name

PETER T. THOMPSON

Address

P.O. BOX 30317
KODIAK, AK. 99615

November 12, 2006

4055 Sweetwater Road
Bow, WA 98232

Ms Stephanie Madsen, Chairman
North Pacific Fishery Management Council
605 West Fourth Avenue, Ste 306
Anchorage, AK 99501

RE: Halibut Charter Overages/SEPARATE ACCOUNTABILITY

Dear Ms Madsen:

The reallocation of halibut from the commercial fleet to the commercial charter fleet must be stopped.

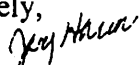
I did not qualify for initial issue of quota share when the IFQ program started even though halibut fishing was and had been part of my income. I have made a living commercial fishing in Southeast Alaska since 1966. I purchased quota shares and struggled to make the payments. I believed in the IFQ program concept and encouraged my son to purchase shares as well. Halibut fishing is fifty percent of my income; commercial fishing is one hundred percent.

The charter fleet has exceeded its GHIL by almost fifty percent in area 2C. The unwillingness of the Council and NMFS to take action to limit the charter harvest to its GHIL is undermining the IFQ concept. For thirteen years the commercial halibut industry has asked the Council to stop the open-ended reallocation from the commercial to the charter industry. SEPARATE ACCOUNTABILITY needs to be adopted for the charter and commercial fleet. The commercial fleet should not be penalized for the charter fleet's inability to stay within its GHIL.

SEPARATE ACCOUNTABILITY allows the charter fleet to regulate itself to stay under its GHIL. Without separate accountability the charter fleet will do nothing to regulate itself because it can continue to steal pounds from the commercial fleet.

Please take immediate action. Support the IFQ program. Make the charter fleet accountable for its catch. Adopt SEPARATE ACCOUNTABILITY for charter and commercial fleets.

Sincerely,


Jay Haun
Owner/Operator
FV/CINNABAR

Cc: Commissioner McKie Campbell, Mr. Jim Balsiger, Halibut Coalition

November 12, 2006

4055 Sweetwater Road
Bow, WA 98232

Ms Stephanie Madsen, Chairman
North Pacific Fishery Management Council
605 West Fourth Avenue, Ste 306
Anchorage, AK 99501

RECEIVED
NOV 16 2006

N.P.F.M.C.

RE: Halibut Charter Overages/SEPARATE ACCOUNTABILITY

Dear Ms Madsen:

The reallocation of halibut from the commercial fleet to the commercial charter fleet must be stopped.

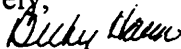
I did not qualify for initial issue of quota share when the IFQ program started even though halibut fishing was and had been part of my income. I have made a living commercial fishing in Southeast Alaska since 1973. I purchased quota shares and struggled to make the payments. I believed in the IFQ program concept and encouraged my son to purchase shares as well. Halibut fishing is fifty percent of my income; commercial fishing is one hundred percent.

The charter fleet has exceeded its GHIL by almost fifty percent in area 2C. The unwillingness of the Council and NMFS to take action to limit the charter harvest to its GHIL is undermining the IFQ concept. For thirteen years the commercial halibut industry has asked the Council to stop the open-ended reallocation from the commercial to the charter industry. SEPARATE ACCOUNTABILITY needs to be adopted for the charter and commercial fleet. The commercial fleet should not be penalized for the charter fleet's inability to stay within its GHIL.

SEPARATE ACCOUNTABILITY allows the charter fleet to regulate itself to stay under its GHIL. Without separate accountability the charter fleet will do nothing to regulate itself because it can continue to steal pounds from the commercial fleet.

Please take immediate action. Support the IFQ program. Make the charter fleet accountable for its catch. Adopt SEPARATE ACCOUNTABILITY for charter and commercial fleets.

Sincerely,



Mrs. Becky Haun
Owner/Operator
FV/CINNABAR

Cc: Commissioner McKie Campbell, Mr. Jim Balsiger, Halibut Coalition

BRENT M. WESTERN
2500 AUTUMN DRIVE
ANCHORAGE, AK 99516

RECEIVED
NOV 22 2006
N.P.F.M.C.

November 21, 2006

Ms Stephanie Madsen, NPFMC Chair
605 West 4th Ave, Ste 306
Anchorage, AK 99501

VIA FAX (907) 271-2817

RE: CHARTER HALIBUT - TAKE ACTION

Dear Ms Madsen,


The NPFMC agenda states after various items to take "action as necessary." Well it is time to stop cutting bait and to take some action -action that should have already been taken! However, we now find ourselves as the proverbial deer in the headlights, when all along we knew what was around the corner if no action was taken. We are very concerned that the halibut charter fleet has exceeded the GHL with no long-term, equitable reallocation mechanism in place between the two commercial sectors.

These sectors provide access to the resource, whether by the person actually catching their own fish with a rod or the silent majority of consumers who access this federal resource through their local grocery or restaurant. To create socioeconomic stability in the halibut fishery and local economies--the Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt separate accountability for the charter and commercial fleets.

The commercial fleet and the majority of American consumers should not be penalized for charter overages. The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue. The Council has failed to meet its commitment to the commercial industry and needs to **take appropriate action now!**

Respectfully,



Brent M. Western, Tony B. Western & Kirt J. Western

CC: Mr. Jim Balsiger, NMFS
Mr. McKie Campbell, ADF&G

November 21, 2006

Ms. Stephanie Madsen
Chair
North Pacific Fishery Management Council
Anchorage, AK

RECEIVED
NOV 22 2006

N.P.F.M.C.

Dear Ms Madsen,

We need to put charter IFQ back to the top of the tool box! Commissioner Campbell promised the public and the NPFMC, when he voted to withdraw charter IFQ, that he would control charter catch to within GHL immediately and take all management measures necessary to accomplish this. He did not say this would take years and special permissions and legislative change and opening up of the IPHC act. Instead, his only action was to prohibit the retention of halibut by charter skippers and crew as a way to save "at least 4%". Now we find that skipper and crew catch has never counted against the charter GHL. What? Why didn't the Commissioner know this? Why didn't his senior assistants at Sport fish Division know this? It makes it very hard to trust the Department or the process. Now we are 47% over the 2C charter GHL. The NPFMC needs to take immediate action to stop the de-facto reallocation of commercial catch to the charter fleet and, now, also to protect the resource. The stalling of management agencies in solving this problem has resulted in the halibut CEY being exceeded. The NPFMC is ultimately responsible for this, as they had the solution, voted twice to support it, then allowed public process to be undermined. If you start treating the charter fleet as a commercial fleet the answer and the solutions will be obvious.


Separate accountability is an obvious necessity. If the pain is only felt by a sector unable to do anything about the situation (taking charter overage off the commercial catch) there is no incentive to change the behavior of the offending fleet. In a commercial fishery, if a sector grossly exceeded their allocation, that sector would be put on bycatch-only at the beginning of the year. Perhaps everyone has blinders on, but this seems to be a reasonable in-season management action for the charter fishery. I doubt if NMFS managers have had an EI-RIR or Plan amendment done for every possibility of bycatch-only management. Limiting charter bag limit to one fish per day in 2007 would be the equivalent of bycatch-only. It doesn't mean a regulation requiring a one fish bag limit should need to be examined, but rather it is a management action in a single season to stay within GHL.

I also urge all Council members to read both the Alaska statute on confidentiality as well as the MOU that is held between ADF&G, CFEC, NMFS and IPHC. Nothing in either the statute or the MOU prohibits the sharing of the halibut charter logbook information. Read these yourself and make an informed decision. Lately it seems that if something is said at a meeting it becomes fact. Legal council is not always correct. Why was ADF&G able to share the original logbook data with the NPFMC, but now they can not? Nothing has changed in the Statute.

Besides separate accountability and allowing management to put the charter fishery on bycatch only in 2C, NPFMC also needs to aggressively pursue a moratorium with the original published date of last December. The Gulf Council has already adopted a moratorium for their charter reef fish fishery, so much of the legal work must have already been covered for NMFS and hence, should be an easy amendment to publish.

Finally, a moratorium alone will not be enough to fix this problem. In addition to the moratorium, I urge the Council to adopt the charter IFQ program, as this tool is still available to them and as been thoroughly analyzed. It is in no-ones best interest, and certainly not the resources, to continue to allow delays and foot-dragging on this important issue.

Sincerely,


Richard Curran
F/V Cherokee
Box 1336
Sitka, AK 99835

11/23/06
North Pacific Fishery Management Council,

The council needs to effectively manage the Halibut Charter fishery. You need to establish separate accountability so the longliners don't have to pay for charter overages. The council also needs to implement a one fish bag limit for charter clients, and institute a moratorium. The charter fishery needs to be held to their GHL and live within that harvest cap.

(like the split between the commercial trollers and charter fleet for king salmon)

I don't feel that the charter fleet should be able to buy IFQs from longliners. We should each have our separate percentage of the Quota to stabilize & maintain both the longline and charter fisheries.

Sincerely,

Marty Remund

Port Alexander, Ak.

907-568-2226

RECEIVED

NOV 24 2006

N.P.F.M.C.

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED
NOV 27 2006
N.P.F.M.C.

Subject: Sport fishing Moratorium Considerations

I am a sport fishing enthusiast who has, in recent years, added the Alaska experience to my vacation options, hence my interest in your management policies. I have recently been made aware that the North Pacific Fishery Management Council is in the process of continuing its effort to allocate the halibut fishery amongst the users of this valued public resource and the Council is contemplating a moratorium on sport charter fishing.

I assume that through the federal legislation, that this public resource is managed by you under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available stock that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. (A permit I assume means that it is subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion

A moratorium on the sport fishing industry via charter limitation is contrary to the public having access to its fishery. It is how the majority of the halibut sport fishing is done by the general public that do not live in proximity and have the luxury of owning a boat that is large enough to safely venture to the fish. I am one of those fishermen. (Sounds like an "anglers disability act" needs to be legislated to assure fishermen have safe access). It is not in the best interests of the American public to place its sport fishing access in jeopardy. The resource is not in danger of being over fished by the general public. It is my understanding that today, the sport fishing activities remove only 13% of the available fish, while the rest is taken by commercial fishermen. This is a significant imbalance in allocation that may have been appropriate in years past. The public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow.

It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. It is obvious that the resource is not in danger. It is improperly allocated given the public's desire to enjoy the resource.

It would be refreshing to see the North Pacific Fishery Management Council take a more proactive stance on assuring that the rightful owners, the American public, are allowed to continue to have access to a fair share of the fish. A 13-87 split doesn't make it. At last count, the general public is made up of 300,000,000 people.

Has the sport allocation kept up with the desired growth in public use?
If the answer is "no" let's fix it.

Sincerely,



North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED
NOV 27 2006
N.P.F.M.C.

Subject: Moratorium Considerations on Sport Fishing

I am an avid sportsman and have thoroughly enjoyed several sport fishing trips to Alaska. These Alaska trips are some of the best vacations I have ever experienced. I have two young children and cannot wait to experience Alaskan Halibut fishing with them. I have recently been made aware that the North Pacific Fishery Management Council is contemplating a moratorium on halibut sport charter fishing. I am very disappointed in this news and urge you to not reduce the percentage of halibut caught by sport fishing enthusiasts on chartered boats.

American people have the first right for any resource. I hope that the Fisheries Management Council keeps this in mind while setting policy. I assume that through the federal legislation, halibut is managed under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available biomass that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. These permits should be subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion.

A moratorium on the sport fishing industry via charter limitation is not in sync to the public having access to its fishery. Moreover, it is not in the best interests of the American public to place its sport fishing access in jeopardy. If the North Pacific Fisheries Management Council limits charters they will also limit the access to me and other general public to have safe access to our fish, as we cannot afford to have a personal boat to allow halibut fishing access. This would truly be another American tragedy and twofold at that. We would lose access to halibut fishing but also the Alaskan economy would suffer as well. Every trip I make to Alaska costs a great amount of money. This money is spread all over town for lodging, car rental, fish processing, eating, etc. If you limit the sport fishing access via charter boat you will also make a significant negative economic impact for the people of Alaska by putting their livelihoods in jeopardy.


The halibut biomass is not in danger of being over fished by the general public. Apparently the sport fishing activities remove less than 15% of the available fish, while the balance is taken by commercial. There seems to be a significant imbalance in allocation. This allocation might have been appropriate in the past but it is no longer in balance as the public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow and the American people have the first right of any resource.

Recreation can take care of the resource management. I enjoy waterfowl hunting as much as I do halibut fishing. In fact, my family has a long history of waterfowl hunting, as my grandfather was a commercial hunter but had to change his career, as the American people wanted a larger share of their resource. Today, our waterfowl resource is doing wonderful and is properly managed via sport hunting. This is one model where regulations have properly managed an American resource. Other models where the commercial industries have had more than their fair share have ended in disaster as the commercial fishing industry has annihilated various species of fish. Please consider the track record of the commercial fishing industry versus the sport fishing industry that has had a healthy effect on our resources and economies.

It is obvious that the halibut fishery is not in danger. It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. The halibut take is improperly allocated given the public's desire to enjoy the resource. Please do not stop me and my family as well as other Americans from enjoying access to our halibut. The people's access and mass of halibut should be increasing, not decreasing. I urge you to help us.

Please feel free to contact me for any questions.

Sincerely,



Gary Lippner
3028 Panama Avenue
Carmichael, CA 95608

**SITKA'S SECRETS**

www.sitkasecret.com • Info@sitkasecret.com

November 28, 2006

North Pacific Fisheries Management Council
605 W 4th Ave Suite 306
Anchorage AK 99501-2252
907-271-2817

RECEIVED
NOV 23 2006**N.P.F.M.C.**

Dear NPFMC Members:

We started our charter boat business in Sitka, Alaska, in 1986, and have participated in the charter boat management issue since it was first brought before the Council, more than 10 years ago.

Our position remains the same, and is most closely aligned with the position of the Alaska Charter Association.

To emphasize a few points, the Council needs to acquire *accurate* economic and harvest data pertaining to the recreational fishery, before a *fair* allocation, regarding a *public* resource can be considered.

We chartered daily in the summer of 2006, and question ADF&G's extrapolation figure of a 40 percent increase over the GHF for Area 2C. Their estimate is in dramatic contrast to our first hand experience.

The Alaska Charter Association's True Accountability proposal makes much more sense than Alaska Longline Fishermen Association's Separate Accountability proposal.

We are very happy to have the Alaska Charter Association represent us at the December Council meeting, and hope you will give extra consideration to what they have to say. Thank you very much.

Sincerely,



Winter King Charters

All Season Salmon and Halibut Charters
Smooth Comfortable Ride • 32' Heated Catamaran



RECEIVED
NOV 20 2006

N.P.F.M.C.

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 18, 2006

Members of the North Council:

As proposed by ALFA, Separate Accountability would account for GHM overages in the removals portion of IPHC's catch calculations, while applying only the GHM to the anticipated removals below the CEY calculation. One effect of this accounting change will be to give the longline sector a few more fish to catch in the event of the GHM being exceeded. The other effect will be the treatment of the GHM as an allocation, something it was never intended to be. Today ALFA seeks relief for GHM overages, while in 2005 in Areas 2C and 3A alone, 923 thousand pounds of wastage were generated by the longline sector, and 842 thousand pounds of halibut TAC were left unharvested. (Source: IPHC)

Assuming each sector has a true allocation and the tools with which to effectively manage its harvest, intra-sector accountability makes perfect sense. However, SA does not take accountability far enough, since it ignores wastage and bycatch. I have enclosed a proposal for True Accountability, where *each sector is 100% accountable for both staying within its allocation and minimizing its wastage or bycatch*. Please give it your consideration.

In summary, Separate Accountability is too little, too soon. The recreational/charter sector must have a true allocation and effective harvest management tools in place *before* it can be held accountable for its harvest. I urge the Council to move forward with the Charter Moratorium, followed by implementation of a true allocation, management tools, and finally, True Accountability.

I thank you again for your time.

Sincerely,

Rex Murphy

Encl: True Accountability Proposal

Rex Murphy owner/operator

P.O. Box 3309 • Homer, AK 99603 • 907-235-9113 • www.winterking.com

True Accountability Proposal

Introduction

Separate Accountability as described by ALFA, proposes to account for Charter Guideline Harvest Level overages in the Removals portion of the IPHC halibut catch calculations, while not including those overages in the projections for anticipated recreational removals for the following year. One result of this suggested accounting change would be to lessen the "ding" of a charter overage on the following year's commercial allocation. Another effect would be treatment of the GHL as an allocation, something it was never intended to be.

If the charter sector had a firm allocation and if management tools were in place to effectively manage the charter harvest within its allocation, what ALFA proposes would be the result. At present, neither of these prerequisites exist. Furthermore there are other elements to the accountability equation that have not been addressed, namely wastage, bycatch and the loophole created by splitting charter operations from the rest of the recreational fishery.

Wastage

Wastage is defined as halibut mortality from commercial halibut fishing. The IPHC says that wastage "primarily refers to the mortality of sublegal halibut that are returned to sea or legal sized halibut that are caught by lost or abandoned commercial fishing gear and it is divided into legal sized and sub-legal sized fish." (Note that IPHC fails to account for wastage from both high-grading and so-called "economic discards".) In 2004, wastage for areas 3A and 2C amounted to 1.04 million pounds, 91,000 pounds in the legal-sized category and 949,000 pounds in the sublegal-sized category. Legal sized wastage is accounted for in the removals boxes after the total CEY is calculated, while sub-legal wastage is accounted for in the harvest rate box, above the CEY calculation. Under the ALFA proposal, the charter sector would still be penalized by commercial wastage, assuming the charter allocation was a percentage of the Combined Fishery Catch Limit.

Bycatch

Bycatch refers to any non-targeted species that are captured while fishing. Regulations require that halibut bycatch be returned to sea. Bycatch mortality depends on the fishery, but ranges between 25 and 75%. In 2004, there were 3.958 million pounds of trawl bycatch in areas 3A and 2C. Under the ALFA proposal, both the charter and commercial sectors will continue to be penalized by bycatch from the trawl sector.

Recreational Loopholes

Currently, non-charter recreational fishermen are not included in any halibut management plans other than a 2 fish per day limit. Under the ALFA proposal, projected non-charter recreational catch would continue to be deducted from the Total CEY, now affecting the

both charter and commercial allocations in an open ended manner. Should charter operations be restricted, it is safe to say that we will see an increase in private fishing trips, bare boat rentals and "self-guided" operations, all clearly not charter operations.

True Accountability Proposal:

The definition of True Accountability is simple: *Each sector is 100% accountable for both staying within its allocation and minimizing its wastage or bycatch.*

Necessary Prerequisites:

1. Separate allocations for recreational, longline and trawl bycatch sectors.
2. Management tools in place to keep all sectors harvest within or very close to allocation.
3. Reliable estimates of trawl bycatch, longline wastage, including high-grading and economic discards, as well as recreational wastage.

Accounting Changes:

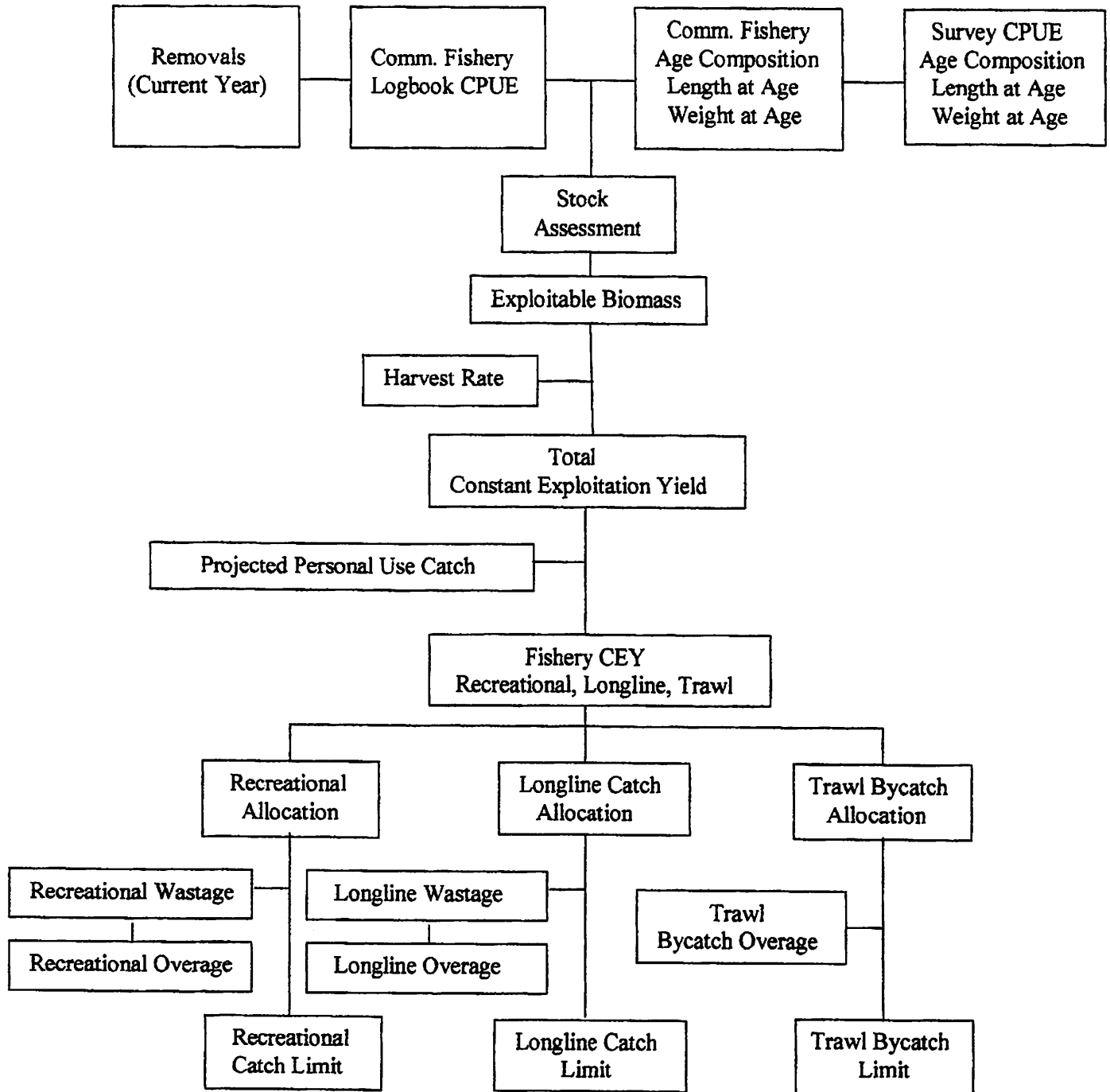
1. All projected wastage (both legal and sub-legal sized) is deducted directly from the allocation of the sector that causes it.
2. Previous year overages are deducted from that sector's allocation.

Resulting in the following:

1. Each sector is 100% accountable for all of its removals, wastage and overages.
2. Other sector's allocations do not suffer from another sector's overages, wastage or bycatch.
3. Each sector now has direct financial incentives to minimize overages, bycatch and wastage, since all now directly affect only that sector's catch limit.

Note: There is contention concerning the treatment of all recreational fishermen as a single sector vs treating the charter element differently from the non-guided element. TA would work in either scenario, with the caveat that in the second scenario, the so-called recreational loopholes would still exist.

TRUE ACCOUNTABILITY PROPOSAL FOR COMBINED FISHERY CEY AND CATCH LIMIT



November 18, 2006

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

FAX: (907) 271-2817

Re: Sport Fishing Moratorium

We are sports fishing enthusiasts who have added Alaska to our vacation options because of the wonderful sports fishing charter options available to us. Consequently, we are interested in your management policies as it applies to sports charter fishing.

We have recently been made aware that the North Pacific Fishery Management Council is considering a moratorium on sport charter fishing.

We are writing to urge that no moratorium on sport charter fishing be imposed.

It is our understanding that sport fishing activities remove less than 15% of the available fish while the remainder is taken by commercial fishermen. Policies that further restrict the allocation for non-commercial fishermen or which further limit charter fishing options for recreational fishermen do not appear to be in the public's best interests.

In reviewing this issue please consider the interests of the general public. As a member of the general public, we find Alaska a destination of choice because of the charter options and fishing activities available. Any further restrictions appear to create a bias for the commercial interests vs. those of the general public. Your consideration of our interests is appreciated.

Sincerely,



John and Gerrie Meany
696 Lassen Drive
South Lake Tahoe, CA 96150



North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RECEIVED
NOV 28 2006
N.P.F.M.C.

November 28, 2006

To Members of the North Council:

My name is Holly Van Pelt and I reside in Homer. I own and operate an accommodation business that serves people visiting our state.

I have an interest in how the issue of separate accountability is handled. Separate accountability as proposed only serves to placate the long line sector while ignoring the real problem. I would like to see the council make each sector responsible in some way for all of their wastage and bycatch. I believe that by having a consequence to wasteful behavior, there would be a real incentive on the part of the various fishing fleets to change their behavior. The tonnage reported for the commercial fleet on their wastage and bycatch is huge and should not be tolerated. The halibut that ends up dead on the sea floor is an abuse of a very valuable public resource. I urge the council to create rules that promote responsible harvest of the resource.

Sincerely,

Holly Van Pelt

F/V Pacific Dawn and F/V Nancy K
James E. Phillips and Patricia A. Phillips
USS 3371 Lot 1 / P.O. Box 33
Pelican, AK 99832
(907) 735-2240

October 30, 2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED
OCT 30 2006
N.P.F.M.C.

Dear Ms Madsen,


I am very concerned about the halibut charter fleet exceeding the GHL causing the economic value of commercial quota share to adversely diminish.

The NPFMC is charged to responsibly manage the halibut fishery within GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. How responsible is that? The NPFMC must act to reestablish its commitment to sustainable fisheries and coastal fishing communities.

Commercial fishermen already suffer from the negative effects from charter boat overages of the GHL. The NPFMC and the National Marine Fisheries Service need to take prompt and effective action to prohibit the charter sector from exceeding the GHL allocation. Separate accountability strategies are needed to identify the harvest of halibut by the charter fleet.

For thirteen years the commercial halibut fishermen have demanded a stop to the open-ended harvest of halibut by the charter industry. To feign effective action is a disservice to the resource. Please readdress this vital issue in a way that protects the very survival of coastal communities and the commercial fishing families they represent.

Sincerely,



Patricia Phillips

11-1-06
P.O. Box 22834
Juneau Ak. 99801
907-723-9843

RECEIVED
NOV - 3 2006

N.P.F.M.C.

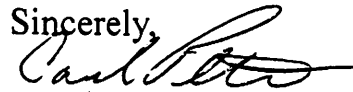
Ms. Stephanie Madsen,

I have been a commercial longline fisherman for 25yrs. And I embraced the IFQ system adopted by the NPFMC. It has been an enormous success, for both harvester and consumers.

I have made a large investment in this system, and I now find it being eroded by another commercial fishery. That would be the halibut charter industry. The GHJ adopted as a guideline is now being exceeded by 50% in area 2C, and by 10% in area 3a. This a direct reallocation of this halibut resource. It is costing my business a lot of money, and raising prices to the consumer .

I encourage you and the council to make the tough decision's, and require the halibut charter fleet to adopt there own IFQ system or stay within the GHJ for their fleet. Thank you.

Sincerely,



Carl Peterson

**FISHING VESSEL OWNERS' ASSOCIATION
INCORPORATED**

ROOM 232, WEST WALL BUILDING • 4005 20TH AVE. W.
SEATTLE, WASHINGTON 98199-1290
PHONE (206) 284-4720 • FAX (206) 283-3341

SINCE 1914

RECEIVED
NOV - 3 2006
N.P.F.M.C.

November 1, 2006

Ms. Stephanie Madsen
Chairwoman
North Pacific Fishery Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501-2252

RE: Halibut Charter

Dear Chairwoman Madsen:

This letter is to express our concerns about the recent news from Alaska that the charter industry has once again exceeded its guideline harvest level of halibut in area 2C by double digits. The overage in 2004 was 22%, in 2005 36%, and a forecast for 2006 is a 42% to 47% overage. This is unacceptable. West Coast commercial harvesters live within harvest limits and rules as do sports and charter operations from Washington to California and Hawaii as managed through the Pacific and Western Pacific Councils. The NPFMC's track record on resolving this 13-year old allocation problem should be an embarrassment for you and your fellow Council members.

People are being economically injured because of the lack of action on this issue. Crew members who have bought 2C quota have paid record prices only to see their investment be eroded by inaction of the Council. The members of the Fishing Vessel Owners' Association (FVOA) request that the Council take enforceable action to regulate its own GHL for charter operations. To not do so shows a lack of respect to the commercial harvesters and continues to erode the credibility of the Council process. Why would an independent small boat owner want to invest in Alaska fisheries with the current lack of business stability?

Over the last 13 years, the Council has provided the Pollack industry in the Bering Sea business stability and the non-Pollack Bering Sea industry with rationalization, and the Bering Sea crab industry with rationalization. These fisheries are dominated by non-Alaskans. The question is why can't the NPFMC, dominated by Alaskans, give stability to area 2C halibut fishermen when 80% of the quota is held by Alaskans? The current situation is unacceptable based on West Coast management standards, and we request a Congressional review of the NPFMC's actions concerning the charter boat GHL. This includes past Council actions, why NMFS stalled implementation when the NPFMC did take

affirmative action, and the dismantling of the Charter Log Book program by the State of Alaska, which seemed to be an attempt to sabotage the past action of the NPFMC.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Alverson", with a long horizontal flourish extending to the right.

Robert D. Alverson
Manager

RDA:cmb

Enclosure

Cc: Washington State Congressional Delegation
Alaska State Congressional Delegation

CHARTER HALIBUT HARVESTS IN IPHC AREAS 2C AND 3A

**AREA 2C THE CHARTER HALIBUT GHL ADOPTED BY THE COUNCIL IN
FEBRUARY, 2000 IS 1.432 MILLION POUNDS, NET WEIGHT.**

Year	No. Fish	Avg. Net Wt.	Biomass	Deviation from GHL
1999	52,696	17.8	0.938	-34%
2000	57,208	19.8	1.132	-21%
2001	66,435	18.1	1.202	-16%
2002	64,614	19.7	1.275	-11%
2003	73,784	19.1	1.412	-1%
2004	84,327	20.7	1.750	+22%
2005	102,206	19.1	1.952	+36%
2006 ¹	107,238	19.0	2.035	+42%
2006 ²	105,651	19.3	2.113	+47%

**AREA 3A THE CHARTER HALIBUT GHL ADOPTED BY THE COUNCIL IN
FEBRUARY, 2000 IS 3.650 MILLION POUNDS, NET WEIGHT.**

Year	No. Fish	Avg. Net Wt.	Biomass	Deviation from GHL
1999	131,726	19.2	2.533	-31%
2000	159,609	19.7	3.140	-14%
2001	163,349	19.2	3.133	-14%
2002	149,608	18.2	2.723	-25%
2003	163,629	20.7	3.382	-7%
2004	197,208	18.6	3.668	+1%
2005	206,902	17.8	3.689	+1%
2006 ¹	225,798	17.6	3.968	+9%
2006 ²	216,551	18.2	3.947 ³	+8%

¹ Projected based on traditional method based on linear trends in SWHS estimates.

² Projected based on extrapolation of reported logbook harvest through Aug. 15.

³ An additional 0.469 M lb were harvested by skipper and crew.

Ms. Stephanie Madsen, chair

11-02-06
RECEIVED
NOV - 6 2006

BACKGROUND: THE COST OF THE HALIBUT CHARTER OVERAGE 2004-2006 in area 2C

N.P.F.M.C.

Market value of Area 2C quota that has ?transferred? from commercial TAC to charter halibut fishery in 2006: approximately 680,000 pounds @ \$20 / pound = \$13,600,000
Ex-vessel value of area 2C IFQ that has ?transferred? from commercial TAC to charter: 1,519,000 pounds @ \$3.50/pound = \$6,316,500

In 2C the 2006 charter overage (harvest above the Guideline Harvest Level set for the charter fleet) will equate to approximately 5% decrease in each commercial fishermen's 2007 IFQ.

Details on the charter overage in both 2C and 3A:
http://www.fakr.noaa.gov/npfmc/current_issues/halibut_issues/stakeholder/October06/ADF&G_GHLstatus.pdf

Information on impending Council action and more background at:
http://www.fakr.noaa.gov/npfmc/current_issues/halibut_issues/halibut.htm

*The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

*The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

*For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the

[http://www.fakr.noaa.gov/npfmc/current_issues/halibut_issues/halibut.htm](#)

11/1/2006

Please manage the charter GHL.

We commercial fishermen are managed very strictly. I have a state loan on halibut IFQ's in 3a and depend on it for a living. I was awarded very little quota in the beginning. It is not O-Kay for the charter guys to think they can be above the law and be limited. Commercial fisherman (myself) are limited and highly regulated.

Charter industry should be too! thank
AKS

Ms Stephanie Madsen, Chairwoman
NPFMC
605 West 4th Ave, Ste 306
Anchorage, AK 99501

RECEIVED

NOV - 6 2006

N.P.F.M.C.

Juneau, 29th of November

Dear Ms Madsen,

I have been fishing since the 1960s and still go out to catch my IFQs every year. My fellow fishermen and I are very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

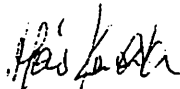
The North Pacific Fishery Management Council promised that they would manage the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

We should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt separate accountability for the charter and commercial fleets.

For the last thirteen years we have asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. It is time for some action on your part!

Thank you for giving this your consideration,

Regards
Al Kuchta



F/V Kerry

209 B Street
Juneau, Alaska 99801



RECEIVED

NOV - 6 2006

N.P.F.M.C.

Günter Math
10620 Starlite Court
Juneau, Alaska 99801 USA

Phone 907 364 4693
Fax 907 586 6094
ketafisheries@yahoo.com

to:

North Pacific Fishery Management Council
Ms Stephanie Madsen
605 West 4th Ave, # 306
Anchorage, AK 99501

October 25th, 2006

Dear Ms Madsen,

It looks like the halibut charter fleet have exceeded the GHL again and the value of commercial quota share is being eroded.

The North Pacific Fishery Management Council did commit to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

In the last 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry.
Please take action soon, this is unacceptable!!!

Best regards

Günter Math
F/V Keta

November 4, 2006

RECEIVED

NOV - 8 2006

N.P.F.M.C.

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

Dear Ms Madsen,

Being a commercial fisherman for 30 plus years and an original issuance of IFQ's, you can perceive my livelihood is dependent upon my continued participation in the halibut commercial fishing industry. I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share. Reducing my commercial quota due to the charter fleet over harvesting is not acceptable.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

I, being one of the commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets. The halibut charter fleet must be held accountable independently for their own overages.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Debra A. Brown
P.O. Box 35473
Juneau, Alaska 99803

Date: NOV. 4, 2006

RECEIVED

NOV - 8 2006

N.P.F.M.C.

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHF and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHF until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHF. The 3A halibut charter harvest is now approximately 10% over the GHF. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely, 

Name James Moore, F.V. ALJAC

Address P.O. Box 770
Haines, Alaska 99827

Date: 11/02/06

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

NOV - 8 2006

N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHIL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHIL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHIL. The 3A halibut charter harvest is now approximately 10% over the GHIL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Leslee L. Downer

Name LESLEE L DOWNER

Address
BOX 1045
HAINES, AK. 99827

Ms. MADSEN,

MY CHILDREN, HUSBAND, AND I RELY ON THIS
FISHERY FOR OUR LIVING. DON'T LET ANOTHER
USER GROUP'S IRRESPONSIBILITY PENALIZE MY FAMILY.

Date: 11/02/06

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV - 8 2006

N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHIL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHIL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHIL. The 3A halibut charter harvest is now approximately 10% over the GHIL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely, *James Dwight Downer*
by Leslie L. Downer
atty. in fact

Name

LESLIE DOWNER / JAMES DWIGHT DOWNER

Address

Box 1045
HAINES, AK 99827

Nov 6, 06

RECEIVED

NOV - 8 2006

N.P.F.M.C.

Dear ms madson,
My husband and I both are IFQ share holder
and are having grave concern about the
charter fleet exceeding the GNL we feel
it is devaluing our commercial quota
shares.

As far as we can see the council has
dropped the ball on their commitment to
manage the charter fishing industry in an
effective manner. We see lots of abuse in the
charter fishery who are overfishing our halibut
stocks and blatantly retailing their fish, even
putting ads in local newspapers.

We need effective action taken now as is it
many years overdue, please take some fair and
equitable action before we all suffer.

Regards
Steve Paulsen Swenson
PO Box 1207
Anchorage, AK 98270

Date:11/12/2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED
NOV 12 2006
N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHIL and is eroding the value of commercial quota share.

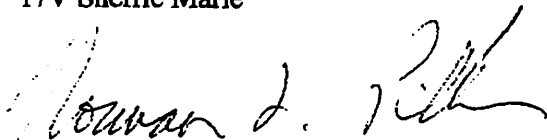
The Council committed to managing the halibut charter fishery to the GHIL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHIL. The 3A halibut charter harvest is now approximately 10% over the GHIL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

I have a longliner that I homeport in Sitka and have two crew that charter in the summer, so I hear both sides of this issue. The re-occurring issue in the Sitka charter fleet is **localized depletion** ! I hear over and over complaints about how far the charter fleet has to travel to find halibut. When the Sitka charter fleet was in it's infancy the majority of halibut fishing took place right off Vitskari Rocks and Cape Edgecumbe in 20 fathoms or less. Now we have boats traveling past Khaz Bay to the west and down to Cape Ommaney to the east, a distance of 50 to 60 miles, to find good halibut fishing. We all feel the effects of high fuel prices these days, and I'm sure the charter fleet would not be running these distances if they didn't have to. Also, the commercial guys that saved quota to fish in the fall in the Sitka area really struggled to get those fish caught. The charter fleet needs to be reigned in, before they put the commercial fleet, as well as **themselves**, out of business! Let's look to the future of this fishery, for all our sakes.

Sincerely, Norman Pillen
F/V Sherrie Marie



Date:

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED
NOV 12 2006
N.P.F.M.C.

Dear Ms Madsen,

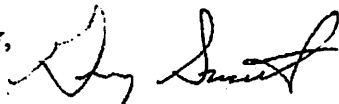
I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Name GREGORY D SMITH

Address 131 Kirk Rd
Sequim, WA 98382

**FISHING VESSEL OWNERS' ASSOCIATION
INCORPORATED**

ROOM 232, WEST WALL BUILDING • 4005 20TH AVE. W.
SEATTLE, WASHINGTON 98199-1290
PHONE (206) 284-4720 • FAX (206) 283-3341

RECEIVED

NOV 13 2006

SINCE 1914

November 6, 2006

N.P.F.M.C.

Ms. Stephanie Madsen, Chairwoman
North Pacific Fishery Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501

RE: Hallbut Charter Boat

Dear Chairwoman Madsen:

This letter is a specific request to the North Pacific Fishery Management Council (NPFMC) to advise the IPHC to curtail harvest as may be needed in order for harvest levels in area 2C and 3A not be exceeded. This advisory action from the NPFMC to the IPHC should stipulate that should charter boat bag limits need to be lowered for part or all of the 2007 season, that this is acceptable to the NPFMC in order to stay within harvest limits.

The Alaska Department of Fish and Game, Division of Sports Fish, has released new and revised statistics showing that charter harvests are now projected to be 47% over the U.S. government's approved Charter Boat Guideline Harvest for Area 2C. It has been reported by the IPHC that this year will be the first year that area 2C harvest limits for all sectors will exceed the harvest limit set for this area by IPHC since adoption of the IFQ program. This has occurred due to the lack of control in the charter sector. It would appear that due to the lack of conservation restrictions imposed by the Council or the State of Alaska, the treaty obligations of the IPHC are now in play due to the projected over harvest. The IPHC has a treaty obligation to keep harvest within its prescribed harvest limits.

With this letter we are asking the IPHC to consider the following charter boat restrictions in order to stay within treaty harvest levels for Area 2C and 3A. We request the support of the NPFMC to encourage IPHC to adopt the necessary regulations for 2007 both for commercial and charter operations to stay within overall harvest levels and within the GHL adopted by the U.S. federal government for charter operations. Our members are requesting that IPHC adopt for 2007 a single bag limit per day for charter boat clients for the entire season in area 2C and for the months of July and August in area 3A.

The rationale for these restrictions is basic. The projected area 2C charter harvest will be 47% over its GHL set by the U.S. government and will result in the 2006 total mortality in area 2C being exceeded if restrictions are not adopted. Without additional regulatory action, overruns can be expected for area 2C in 2007. In area 3A, the charter

boat harvest overage is listed at 8% for 2006. However, it is really 20.7% due to 469,000 pounds harvested by skippers and crew in area 3A. The NPFMC and ADF&G have failed in keeping charter catches below the set harvest levels leaving the responsibility to the IPHC. The NPFMC has the obligation to support the IPHC. Time has run out for the Council. The treaty obligations for IPHC require meaningful management action for 2007 so that overages do not occur. If the NPFMC expressed support to IPHC to take the necessary regulatory actions to stay within harvest limits in Area 3A and 2C, this would be helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert D. Alverson", with a long horizontal line extending to the right.

Robert D. Alverson
Manager

RDA:cmb

Enclosure

cc: IPHC

CHARTER HALIBUT HARVESTS IN IPHC AREAS 2C AND 3A**AREA 2C THE CHARTER HALIBUT GHL ADOPTED BY THE COUNCIL IN FEBRUARY, 2000 IS 1.432 MILLION POUNDS, NET WEIGHT.**

Year	No. Fish	Avg. Net Wt.	Biomass	Deviation from GHL
1999	52,696	17.8	0.938	-34%
2000	57,208	19.8	1.132	-21%
2001	66,435	18.1	1.202	-16%
2002	64,614	19.7	1.275	-11%
2003	73,784	19.1	1.412	-1%
2004	84,327	20.7	1.750	22%
2005	102,206	19.1	1.952	36%
2006 ¹	105,651	20.0	2.113	47%
2006 ²	107,238	19.0	2.035	42%

AREA 3A THE CHARTER HALIBUT GHL ADOPTED BY THE COUNCIL IN FEBRUARY, 2000 IS 3.650 MILLION POUNDS, NET WEIGHT.

Year	No. Fish	Avg. Net Wt.	Biomass	Deviation from GHL
1999	131,726	19.2	2.533	-31%
2000	159,609	19.7	3.140	-14%
2001	163,349	19.2	3.133	-14%
2002	149,608	18.2	2.723	-25%
2003	163,629	20.7	3.382	-7%
2004	197,208	18.6	3.668	1%
2005	206,902	17.8	3.689	1%
2006 ¹	216,551	18.2	3.947	9%
2006 ²	225,798	17.6	3.968 ³ = 4.437	8% $\approx 20.7\%$

average

¹ Projected based on traditional method based on linear trends in SWHS estimates.

² Projected based on extrapolation of reported logbook harvest through Aug. 15.

³ An additional 0.469 M lb were harvested by skipper and crew.

RE: Halibut allocation

RECEIVED

NOV 13 2006

11-10-06

DEAR Ms Madsen **N.P.F.M.C.**

My frustration is sky high over the lack of a resolution of the charter vs commercial halibut allocation — Time has passed with no apparent courage or desire to implement a firm program to give both charter and commercial fishermen stability and the ability to plan for their futures. Both parties have invested heavily but have no ability to plan wisely with the current confusion. Any answer is better than this drift in my opinion.

Having fished the derby years and remembering the unsafe mess that ^{IT} was I'm convinced a firm plan in place as soon as possible is the only answer — No plan will satisfy everyone but protecting the resource should come first. Please act

responsibly Now.

Sincerely

Amy Johnson

AMY JOHNSON

423 VerSTOVIA

SITKA AK

99835

* Do own a few A shares

RECORDED

NOV - 8 2006

November 5, 2006

Dear Ms. Madsen,

N.P.F.M.C.

I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council is committed to managing the halibut charter fishery to the GHL until a long term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

I am 21 years old; I bought halibut IFQ's 3 years ago with my state dividend money as a down payment and financed the balance of the cost. I fish these on my dad's boat. The idea was to earn money for college and down the road as an investment or a base to build on if I wanted to continue in the family business. This years as in previous years this has worked fairly well, averaging the ups and downs of commercial fishing. But with the charter fleet unregulated and not held accountable to their GHL, as you can see by this year's overage of 47% in 2C. So do I sell or is this going to be settled and the charter fleet held accountable.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked to Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,


Matthew Short

RECEIVED

NOV - 8 2006

November 5, 2006

Dear Ms. Madsen,

N.P.F.M.C.

I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

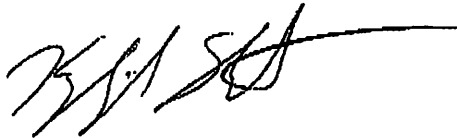
The Council is committed to managing the halibut charter fishery to the GHL until a long term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

I am 21 years old; I bought halibut IFQ's 3 years ago with my state dividend money as a down payment and financed the balance of the cost. I fish these on my dad's boat. The idea was to earn money for college and down the road as an investment or a base to build on if I wanted to continue in the family business. This years as in previous years this has worked fairly well, averaging the ups and downs of commercial fishing. But with the charter fleet unregulated and not held accountable to their GHL, as you can see by this year's overage of 47% in 2C. So do I sell or is this going to be settled and the charter fleet held accountable.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked to Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Kayleigh Short

Nov. 8, 2006

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK 99501
FAX (907)271-2817

RECEIVED
NOV - 8 2006
N.P.F.M.C.

Dear Ms. Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota shares.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 3A halibut charter harvest is now over the GHL as well as the 2C charter harvest. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter fleet overages. The Council and the National Fisheries Service need to effectively manage the charter sector to stay within its allocation. The Council needs to adopt separate accountability for the charter and commercial fleets. For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



Norman Mullan
F/V Cindria Gene
PO Box 92
Kodiak, AK 99615
(907)486-5012
njmullan@alaska.com
FAX (907)486-6048

Randy Kraxberger
2832 Hancock St.
Port Townsend, WA 98368
360-385-6790

RECEIVED
NOV 14 2006

N.P.F.M.C.

Ms. Stephanie Madsen Chair
North Pacific Fisheries Management Council
605 West 4th. Ave. Ste 306
Anchorage Alaska 99501

Dear Ms. Madsen,

I am sure you are aware that the charter fleet went well over its GHL, 10% in 3A and 47% in 2C. Do you know what would happen to a commercial fisher who exceeded his quota share by 47%? That fisher would immediately forfeit all of that overage as well as his vessel and the rest of the quota shares and probably not see the light of day for good long time. In short said fisher would be out business, not rewarded with even more quota to catch next year.

It is time to get control of the charter industry harvest. They need their own separate quota that rises and falls with resource abundance. For the health of the resource and the other user groups the charter industry can not be left out of control in this fully utilized fishery. The commercial fleet can not be expected to continue giving quota to the charter industry.

Your group turned down the IFQ option last December with lots of promises to hold the charter fleet to the GHL, well apparently that did not work. I do not believe the proposed charter moratorium will do much to slow charter industry harvest down, let alone return to the GHL. Now please take immediate action to protect the resource by controlling the charter industry. 47% over their GHL in 2C is an outrageous abuse of the resource you control.

Thank you for your thoughtful consideration of this urgent matter.

Sincerely,

NMFS loan and IFQ holder Randy Kraxberger

Randy Kraxberger
2832 Hancock St.
Port Townsend, WA 98368
360-385-6790

RECEIVED
NOV 14 2006

N.P.F.M.C.

Ms. Stephanie Madsen Chair
North Pacific Fisheries Management Council
605 West 4th. Ave. Ste 306
Anchorage Alaska 99501

Dear Ms. Madsen,


I am sure you are aware that the charter fleet went well over its GHL, 10% in 3A and 47% in 2C. Do you know what would happen to a commercial fisher who exceeded his quota share by 47%? That fisher would immediately forfeit all of that overage as well as his vessel and the rest of the quota shares and probably not see the light of day for good long time. In short said fisher would be out business, not rewarded with even more quota to catch next year.

It is time to get control of the charter industry harvest. They need their own separate quota that rises and falls with resource abundance. For the health of the resource and the other user groups the charter industry can not be left out of control in this fully utilized fishery. The commercial fleet can not be expected to continue giving quota to the charter industry.

Your group turned down the IFQ option last December with lots of promises to hold the charter fleet to the GHL, well apparently that did not work. I do not believe the proposed charter moratorium will do much to slow charter industry harvest down, let alone return to the GHL. Now please take immediate action to protect the resource by controlling the charter industry. 47% over their GHL in 2C is an outrageous abuse of the resource you control.

Thank you for your thoughtful consideration of this urgent matter.

Sincerely,



NMFS loan and IFQ holder Randy Kraxberger

November 14, 2006

Harry C. Sinz
P.O. Box 110985
Anchorage, AK 99511

VIA FACIMILE

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK 99501
907-271-2817 (fax)

RECEIVED
NOV 15 2006
N.P.F.M.C.

Re: Unchecked Growth of Halibut Charter Fleet.

Dear Ms Madsen,

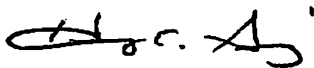
I am writing to express my deep concern over the continued unabated growth in the annual halibut harvests, and in particular, that in both areas 2C and 3A they have repeatedly exceeded the GHL. Without question, this erodes the value in the commercial sectors quota share, and in effect constitutes a "take".

Several years ago the Council made a commitment to manage the halibut charter fleet for obvious reasons. The very foundation of the commercial fleet quota share program which they had created would be put at risk, if other users such as the charter fleet were allowed to grow unchecked. This would erode the growing financial investments fostered through the quota share programs design and implementation. Your fellow citizens were trusting in the reasonable stewardship of the Council members to act promptly....which is what they did in creating the short-term tool (the "GHL"), while a long-term solution was pursued and passed, only to be reversed by the existing Council this past year.

Where and when does this attack on the commercial fleets investment stop? *The Council and the NMFS need to take the necessary steps to manage the charter sector within the boundaries of its allocation and adopt separate accountability for the charter and commercial fleets.*

I trust you will act promptly and responsibly on this matter.

Respectfully,



Harry C. Sinz

Sunday, November 12, 2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED
NOV 15 2006
N.P.F.M.C.

Dear Ms Madsen,

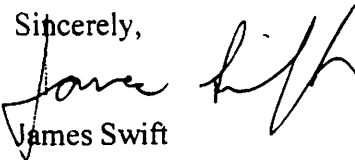
I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



James Swift

7718 78th Loop NW
Olympia WA

RECORDED

NOV 15 2006

Ms Stephanie Madsen,

N.P.F.N.C.

The halibut charter fleet needs to be brought under control. It has been an ongoing issue for far too long and tough decisions needs to be made.

We need to implement a one bag limit for charter clients.

We need to establish separate accountability, end the taking from an established industry to pay for an ever growing charter overages.

And understand that the charter moratorium will not address the ongoing reallocation from an industry that is paying for its right to harvest (IFQ).

An IFQ is the best solution for the charter industry. If the charter industry needs to grow it can then buy the right like others have done, from the commercial sector, then the only limit the charter industry would face is the quota that is allocated each year by the IPHC.

The real reason that IFQ is being rejected is the fact that the charter industry has player that have been under reporting for years. Go to the airports today in Alaska and one can see passengers with multiple fish boxes and wonder has all that product been reported.

An IFQ for charter operations would make all the halibut removals accounted for. This would be good for both industries and the long term health of the fishery.

Thanks for your time.

Sincerely 

Bill Connor
Box 1124
Petersburg, Alaska.
99833

11/13/06

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK. 99501

RECEIVED

NOV 16 2006

N.P.F.M.C.

Dear Ms. Madsen,

I am extremely concerned that the halibut charter fleet has exceeded the GHL once again and is eroding the value of the commercial halibut fishing quota.

The council committed to managing the halibut charter fishery to the GHL until a long-term solution was put in place. The 2C halibut charter harvest is now close to 50% over the GHL!!!! The 3A halibut charter harvest is now about 10% over the GHL. The Council has failed to meet it's commitment to the commercial fishing industry.

The commercial fishing fleet should not be penalized for the charter fleets overages!!! The Council and the National Marine Fisheries Service need to immediately and effectively manage the charter sector to stay within OR UNDER its allocation and adopt a separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

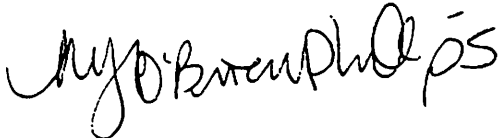
The commercial fishing fleet is subjected to National Marine Fisheries Enforcement agents with loaded guns on our vessels upon deliveries. Our personal freezers on our vessels are searched upon delivery!!! We are held within very strict enforcement guidelines as to overage and underage on our quota. The charter fleet has absolutely no checks and balances when they are unloading and hauling fish to and from the docks. I have seen, many times, in many ports, blatant abuse of the freedom they are allowed as harvester's of the halibut resource. I have, many times seen small fish being hauled up the dock. These fish are our future!!! I, personally, do not mind the checks and balances I am adhered to as a commercial fisherman because I want to continue to have a healthy resource for the future. I AM NOT WILLING TO ADHERE TO THESE STRICT REGULATIONS TO WATCH OTHERS ABUSE IT!!!

I have been involved in Alaska's longline fishing industry for well over 25 years. I am currently a holder of IFQ shares. I am 100% dependent on halibut and blackcod fishing. My two sons are currently involved in the fishery as well. We are Alaska residents who live, work and love Alaska. We are Alaska residents with a very strong conviction and concern for the future of the fishery as well as our future in the fishery. PLEASE take a stand and take action to stop the abuse of the over harvesting that the charter fleet is currently involved in. PLEASE implement an enforcement policy for the charter fleet that is similar to the commercial policy. The charter industry can afford to

pay a regulation fee similar to our current 3% fee. If they want to harvest the resource, they like us, should have to pay for the enforcement of the fishery that will ensure a fishery for the future for all of us.

Thank you for being concerned and listening to my concerns.

Sincerely,



Maura J. O'Brien-Phillips
P.O. Box 1315
Petersburg, AK. 99833

907-772-2554

cc: Commissioner McKie Campbell
Alaska Department of Fish and Game
PO Box 25526
Juneau, Ak. 99802-5526

cc: Mr. Jim Balsiger
Alaska Regional Administrator
National Marine Fisheries Service
PO Box 21668
Juneau, AK.
99802-1668

11/12/06

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV 16 2006

N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share. My crew and I have invested hundreds of thousands of dollars in IFQ. We need to be able to repay our loans. We can not be continually allocating a higher percentage of fish to the growing charter fleet.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Dwight E. Riederer

22928 SE 406th St.
Enumclaw, WA 98022

Chair Stephanie Madsen
NPFMC
605 West 4th Street
Anchorage, AK 99501

RECEIVED

NOV 16 2006

N.P.F.M.C.

November 13, 2006

Dear Ms. Madsen,

The NPFMC needs to address and remedy the continuing overharvest of halibut by the charter vessel fleet in areas 2C and 3A. Once again, the charter fleet has exceeded its GHL, which results in an allocation away from the longline fleet. Many longliners, like myself, have invested a lot of time and money into our fishery and consider our quota shares assets to be treated as private property. Reallocating the resource obviously diminishes not only our catch, but also the value of our property.

With the failure to enforce the GHL, I am in favor of the Council taking such short-term actions as going to a one fish bag limit for charter clients, trip limits, and having separate accounting for the commercial quota system so that charter fleet overages do not affect the commercial fleet's allocation.

For the long term, however, I feel that an IFQ system for the charter fleet is the most viable means to solve the allocation battle. Please revisit this issue. In the meantime make sure that the charter boat GHL gets enforced.

Sincerely,



Rion T. Vanek

Box 251

Ninilchik, AK 99639

(907)567-7394

11/13/06

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK. 99501

RECEIVED

NOV 16 2006

N.P.F.M.C.

Dear Ms. Madsen,

I am extremely concerned that the halibut charter fleet has exceeded the GHL once again and is eroding the value of the commercial halibut fishing quota.

The council committed to managing the halibut charter fishery to the GHL until a long-term solution was put in place. The 2C halibut charter harvest is now close to 50% over the GHL!!!! The 3A halibut charter harvest is now about 10% over the GHL. The Council has failed to meet it's commitment to the commercial fishing industry.

The commercial fishing fleet should not be penalized for the charter fleets overages!!! The Council and the National Marine Fisheries Service need to immediately and effectively manage the charter sector to stay within OR UNDER its allocation and adopt a separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

The commercial fishing fleet is subjected to National Marine Fisheries Enforcement agents with loaded guns on our vessels upon deliveries. Our personal freezers on our vessels are searched upon delivery!!! We are held within very strict enforcement guidelines as to overage and underage on our quota. The charter fleet has absolutely no checks and balances when they are unloading and hauling fish to and from the docks. I have seen, many times, in many ports, blatant abuse of the freedom they are allowed as harvester's of the halibut resource. I have, many times seen small fish being hauled up the dock. These fish are our future!!! I, personally, do not mind the checks and balances I am adhered to as a commercial fisherman because I want to continue to have a healthy resource for the future. I AM NOT WILLING TO ADHERE TO THESE STRICT REGULATIONS TO WATCH OTHERS ABUSE IT!!!

I have been involved in Alaska's longline fishing industry for well over 25 years. I am currently a holder of IFQ shares. I am 100% dependent on halibut and blackcod fishing. My two sons are currently involved in the fishery as well. We are Alaska residents who live, work and love Alaska. We are Alaska residents with a very strong conviction and concern for the future of the fishery as well as our future in the fishery. PLEASE take a stand and take action to stop the abuse of the over harvesting that the charter fleet is currently involved in. PLEASE implement an enforcement policy for the charter fleet that is similar to the commercial policy. The charter industry can afford to

pay a regulation fee similar to our current 3% fee. If they want to harvest the resource, they like us, should have to pay for the enforcement of the fishery that will ensure a fishery for the future for all of us.

Thank you for being concerned and listening to my concerns.

Sincerely,

Aaron Lee Phillips

Aaron Lee Phillips
P.O. Box 1315
Petersburg, AK. 99833

907-772-2554

cc: Commissioner McKie Campbell
Alaska Department of Fish and Game
PO Box 25526
Juneau, Ak. 99802-5526

cc: Mr. Jim Balsiger
Alaska Regional Administrator
National Marine Fisheries Service
PO Box 21668
Juneau, AK.
99802-1668

Randy Kraxberger
2832 Hancock St.
Port Townsend, WA 98368
360-385-6790

RECEIVED
NOV 16 2006
N.P.F.M.C.

Ms. Stephanie Madsen Chair
North Pacific Fisheries Management Council
605 West 4th. Ave. Ste 306
Anchorage Alaska 99501

Dear Ms. Madsen,

I am sure you are aware that the charter fleet went well over its GHL, 10% in 3A and 47% in 2C. Do you know what would happen to a commercial fisher who exceeded his quota share by 47%? That fisher would immediately forfeit all of that overage as well as his vessel and the rest of the quota shares and probably not see the light of day for good long time. In short said fisher would be out business, not rewarded with even more quota to catch next year.

It is time to get control of the charter industry harvest. They need their own separate quota that rises and falls with resource abundance. For the health of the resource and the other user groups the charter industry can not be left out of control in this fully utilized fishery. The commercial fleet can not be expected to continue giving quota to the charter industry.

Your group turned down the IFQ option last December with lots of promises to hold the charter fleet to the GHL, well apparently that did not work. I do not believe the proposed charter moratorium will do much to slow charter industry harvest down, let alone return to the GHL. Now please take immediate action to protect the resource by controlling the charter industry. 47% over their GHL in 2C is an outrageous abuse of the resource you control.

Thank you for your thoughtful consideration of this urgent matter.

Sincerely,



NMFS loan and IFQ holder Randy Kraxberger

RECEIVED

NOV 16 2006

Dear Mrs Madsen,

N.P.F.M.C.

I am real concerned over the fact that the charter fleet has once again exceeded the GHL and that it is taking away from the value of the commercial quota share.

As I am sure you know the percentage of the overages, I won't repeat them, but I don't think the commercial fleet should be penalized for the overages.

I don't have any great ideas on how one might manage these problems, but I feel that both the charter fleet and commercial fleet should be responsible for their own accountability.

Sincerely,

Jack C Lyons

Box 527
Petersburg, Alaska 99833

Date:

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED

NOV 17 2006

N.P.F.M.C.

Dear Ms Madsen,

I am very concerned that the halibut charter fleet has exceeded the GHF and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHF until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHF. The 3A halibut charter harvest is now approximately 10% over the GHF. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Ronald G. Thomson

Name RONALD G THOMSON

F/V NORTHERN JAEGER 58'

Address Box 507 KODIAK, AK 99015

CONTROL OF THE FISHERY NEEDS TO BE TAKEN BY
IMPLEMENTING A ONE FISH BAG LIMIT FOR CHARTER CLIENTS

ESTABLISH SEPARATE ACCOUNTABILITY, ENDING THE UNACCEPTABLE
TAXING OF THE LONGLINE INDUSTRY TO PAY FOR CHARTER
OVERAGES

RECOGNIZE THAT THE CHARTER MORATORIUM WILL NOT
ADDRESS THE ON-GOING REALLOCATION AND THAT IF Q
REMAIN THE BEST LONG-TERM SOLUTION.



Winter King Charters

All Season Salmon and Halibut Charters
Smooth Comfortable Ride • 32' Heated Catamaran



RECEIVED
NOV 20 2006

North Pacific Fisheries Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

November 18, 2006

N.P.F.M.C.

Members of the North Council:

I am writing this letter to comment on the proposed 5 fish limit for charter clients in SE Alaska.

The October 2006 NOAA/NMFS Discussion Paper on the 5 fish limit indicates that in 2004, only 9 to 16% of anglers on charter boats (including skipper and crew) harvested 6 or more halibut in area 2C. From this statistic alone, it is clear that this measure will not lower the harvest below the GHL.

Common sense dictates that the simpler the rule, the easier it is to enforce. Establishing an annual limit for charter anglers is a case in point. Instead of having a simple 2 fish/day limit for all recreational anglers, the Council proposes a 5 halibut annual limit for charter anglers only, which will incur at least another \$650,000 yearly in enforcement costs at the Federal level alone. Meanwhile, an angler on a private or rented boat can continue to take 2 fish per day all year long, even with a filled charter limit. The bottom line is if a charter angler really wants to harvest more than 5 halibut annually in SE Alaska, ample means exist in the private boat or self guided regime to allow him to do so.

I remain perplexed at the Council's desire to treat private and charter recreational anglers differently, when it is precisely this treatment that creates the added complexity, associated costs and loopholes mentioned above.

In summary, the 5 fish annual limit will fail to lower the harvest below the GHL, is cost prohibitive to enforce, and is easily worked around by those who desire to catch more than 5 halibut. I urge the Council to rescind this action.

Thank you for your time.

Sincerely,

Rex Murphy

Rex Murphy owner/operator

P.O. Box 3309 • Homer, AK 99603 • 907-235-9113 • www.winterking.com

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED

NOV 20 2006

N.P.F.M.C.

Subject: Sport fishing Moratorium Considerations

I am a sport fishing enthusiast who has, in recent years, added the Alaska experience to my vacation options, hence my interest in your management policies. I have recently been made aware that the North Pacific Fishery Management Council is in the process of continuing its effort to allocate the halibut fishery amongst the users of this valued public resource and the Council is contemplating a moratorium on sport charter fishing.

I assume that through the federal legislation, that this public resource is managed by you under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available stock that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. (A permit I assume means that it is subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion

A moratorium on the sport fishing industry via charter limitation is contrary to the public having access to its fishery. It is how the majority of the halibut sport fishing is done by the general public that do not live in proximity and have the luxury of owning a boat that is large enough to safely venture to the fish. I am one of those fishermen. (Sounds like an "anglers disability act" needs to be legislated to assure fishermen have safe access). It is not in the best interests of the American public to place its sport fishing access in jeopardy. The resource is not in danger of being over fished by the general public. It is my understanding that today; the sport fishing activities remove only 13% of the available fish, while the rest is taken by commercial fishermen. This is a significant imbalance in allocation that may have been appropriate in years past. The public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow.

It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. It is obvious that the resource is not in danger. It is improperly allocated given the public's desire to enjoy the resource.

It would be refreshing to see the North Pacific Fishery Management Council take a more proactive stance on assuring that the rightful owners, the American public, are allowed to continue to have access to a fair share of the fish. A 13-87 split doesn't make it. At last count, the general public is made up of 300,000,000 people.

Has the sport allocation kept up with the desired growth in public use?
If the answer is "no" let's fix it.

Sincerely,

Diane Cobb
735 Samish Ave, Suite 110
Roswell, CA 95661

November 1, 2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

RECEIVED
NOV 2 6 2006

N.P.F.M.C.

Dear Stephanie,

Just one more issue where we feel as though our very livelihoods are being reallocated to other parties without enough attention to the fact that a decision from the council can change the whole balance of a very delicately balanced way of life.

We are very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Ken & Chris Holland

Ken and Chris Holland
F/V POINT OMEGA
PO Box 608
Kodiak, AK 99615



Mr Gerald Howard
5725 W Walbrook Dr
San Jose, CA 95129-4154

EMAIL: CHONG@HOWARD@YAHOO.COM

REC-11-D

NOV 21 2006

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907) 271-2817

Subject: Halibut Sport Fishing Limitations

N.P.F.M.C.

I am a sport fishing enthusiast who, for the past 10 years, have been vacationing at least 2 weeks annually in Alaska to fish for halibut and salmon. I have recently become aware that the North Pacific Fishery Management Council has on it's agenda, discussions that would limit charter halibut sport fishing.

I assume that through federal legislation, the halibut fishery is managed by you to assure every effort is made to enable access and use by the general public. Under this assumption, the fishing public (consisting of sportfishermen, both private and charter) should have first priority access to the fish. After the fishing public has taken their allowable share, as determined by sportfishing limits, the remaining halibut that can be harvested without jeopardizing the health of the fishery is allocated to "commercial" fishing via permits. Assumably these permits are subject to change and possible re-issuance at up or down levels in a "fair and equitable" fashion depending on how many fish are estimated to be available after the sportfishing harvest. In short, the public has first priority and commercial interests get what is left.

The proposed moratorium on sport fishing via limiting charter boat access is contrary to the public having access to its fishery. Vacationing fishermen, such as myself, can only get to the fish by chartering a boat and guide (or skipper) that can safely take us out on the water where the fish are. If halibut fishing by the general public is squeezed off by your actions, we will no longer have an economically viable way to enjoy this source of recreation. In short, it would greatly reduce my incentive to vacation (and spend money) in Alaska. This in turn would hurt the local economies of fishing communities dependent on people such as myself who stay in local motels, use local fish processing facilities, and pay local merchants for various services. Additionally, it will hurt the airlines and car rental industries.

In view of the reported statistic that recreational sportfishing currently takes only 13% of the available fish, it would appear that the resource is not endangered by sportfishing. To the contrary it would seem that commercial fishing, which takes by far the majority of fish, contributes proportionately less to the general economy. Why squeeze off the halibut recreational sportfishing, which benefits the greater number of people, in favor of the commercial interests who already take a majority of the resource? If the Management Council sees the available fish decreasing, it makes more sense to reduce the number of fish taken through commercial permit reductions.

In summary, I do not feel it's in my best interests, the American public's best interests, or the Alaskan small businessman's best interest to place Alaska's Halibut sport fishing access in jeopardy.

Sincerely,

Gerald A. Howard
Gerald A. Howard

November 20, 2006

REC'D
NOV 22 2006
N.P.F.M.C.

Stephanie Madsen, Chair
NPFMC
605 West 4th
Anchorage, AK. 99501

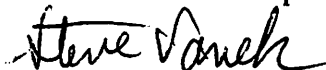
Dear Ms. Madsen:

The Council, NMFS, and ADF&G have all failed to control the charter overages in the halibut fishery as promised when the charter IFQ program was voted down.

There is no effective management action in place to reduce the charter overages. The Council needs to adopt a one fish limit for charter clients. There also needs to be separate accountability for charter and commercial quotas.

The State of Alaska has basically thumbed its nose at the Council and the commercial fishing industry by not supporting charter IFQs or any other measure that would reduce the overages.

Please act now. Do something. The established GHL already gave the charter industry 125% of its historic catch. How much more are you going to allow them to take? Don't let 2007 come upon us without you doing something.



Steve Vanek, Longliner
P.O.Box 39103
Ninilchik, AK. 99639
907-567-3470

11/13/06

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK. 99501

RECEIVED

NOV 22 2006

N.P.F.M.C.

Dear Ms. Madsen,

I am extremely concerned that the halibut charter fleet has exceeded the GHL once again and is eroding the value of the commercial halibut fishing quota.

The council committed to managing the halibut charter fishery to the GHL until a long-term solution was put in place. The 2C halibut charter harvest is now close to 50% over the GHL!!!! The 3A halibut charter harvest is now about 10% over the GHL. The Council has failed to meet it's commitment to the commercial fishing industry.

The commercial fishing fleet should not be penalized for the charter fleets overages!!! The Council and the National Marine Fisheries Service need to immediately and effectively manage the charter sector to stay within OR UNDER its allocation and adopt a separate accountability for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

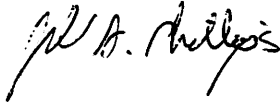
The commercial fishing fleet is subjected to National Marine Fisheries Enforcement agents with loaded guns on our vessels upon deliveries. Our personal freezers on our vessels are searched upon delivery!!! We are held within very strict enforcement guidelines as to overage and underage on our quota. The charter fleet has absolutely no checks and balances when they are unloading and hauling fish to and from the docks. I have seen, many times, in many ports, blatant abuse of the freedom they are allowed as harvester's of the halibut resource. I have, many times seen small fish being hauled up the dock. These fish are our future!!! I, personally, do not mind the checks and balances I am adhered to as a commercial fisherman because I want to continue to have a healthy resource for the future. I AM NOT WILLING TO ADHERE TO THESE STRICT REGULATIONS TO WATCH OTHERS ABUSE IT!!!

I have been involved in Alaska's longline fishing industry for well over 25 years. I am currently a holder of IFQ shares. I am 100% dependent on halibut and blackcod fishing. My two sons are currently involved in the fishery as well. We are Alaska residents who live, work and love Alaska. We are Alaska residents with a very strong conviction and concern for the future of the fishery as well as our future in the fishery. PLEASE take a stand and take action to stop the abuse of the over harvesting that the charter fleet is currently involved in. PLEASE implement an enforcement policy for the charter fleet that is similar to the commercial policy. The charter industry can afford to

pay a regulation fee similar to our current 3% fee. If they want to harvest the resource, they like us, should have to pay for the enforcement of the fishery that will ensure a fishery for the future for all of us.

Thank you for being concerned and listening to my concerns.

Sincerely,



Jeb Stuart Phillips
P.O. Box 1315
Petersburg, AK. 99833

907-772-2554

cc: Commissioner McKie Campbell
Alaska Department of Fish and Game
PO Box 25526
Juneau, Ak. 99802-5526

cc: Mr. Jim Balsiger
Alaska Regional Administrator
National Marine Fisheries Service
PO Box 21668
Juneau, AK.
99802-1668

RECEIVED
NOV 22 2006

N.P.F.M.C.

P.O. Box 1373
Petersburg, Alaska
99833

907 772-4521

rittleton@aptalaska.net

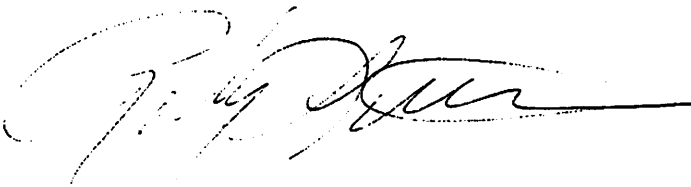
November 19, 2006

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Ms. Madsen,

I am writing to express my concerns regarding charter halibut overages. The commercial fleet should not be penalized for these overages. I bought 60% of the IFQ halibut that I own. I still have bank loans totaling \$330,000 at 9.75% interest for the 2C halibut that I have bought. It does not seem right that the IFQ that I have paid up to \$18 per pound for is being reallocated to the charter fleet. I feel that the charter fleet should have an IFQ program such as the commercial fleet so they can buy IFQ as we have to.

Sincerely



Cs Commissioner McKie Campbell
Cs Mr. Jim Balsiger



SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

November 22, 2006

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

RECEIVED
NOV 24 2006

N.P.F.M.C.

Dear Madame Chairman and Council Members:

Seafood Producers Cooperative is the oldest and largest fisherman owned cooperative in the United States. Over 300 of our 512 Alaskan fisherman owners have invested in the IFQ longline fishery. Many of our owner/fishermen made these investments based upon the stated intention and direction of the NPFMC to introduce accountability to the charter fleet.

Upon rescinding the 2001 IFQ charter plan the NPFMC committed to managing the charter harvest to the GHL until a long-term management strategy is implemented. The measures approved by the Council, annual limits and skipper/crew retention elimination were not implemented. The NPFMC, NMFS and ADFG have all failed in efforts to manage the charter harvest. In 2006 the GHL was exceeded by 47% in 2C and 10% in 3A. In 2005 the GHL was exceeded by 36% in 2C.

Unmanaged continuation of this trend will severely impact the commercial fishing industry. The 2006 GHL overages in 2C and 3A equal almost a million pounds. The commercial fishing industry will once again pay the price for lack of accountability within the charter fleet.

SPC urges the Council to take control of the fishing by implementing a one fish bag limit for charter clients; establish resource management accountability within the charter fishery and impose the moratorium, but recognize that a moratorium will not address the reallocation issue. An IFQ solution remains the best long term solution. Since the establishment of the IFQ program, the commercial fleet has not exceeded their quota.

We support the efforts of the Stakeholder Committee and urge the Council to restore credibility and integrity to the Council process.

Sincerely,

Tom McLaughlin

President/CEO
Seafood Producers Cooperative

ALASKA LONGLINE FISHERMEN'S ASSOCIATION
403 Lincoln Street, Ste. 237 Sitka, AK 99835
Phone: (907) 747-3400 Facsimile: (907) 747-3462
alfafish@ptialaska.net

November 20, 2006

Chair Stephanie Madsen
North Pacific Fishery Management Council
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501

RECEIVED

NOV 24 2006

N.P.F.M.C.

Dear Members of the Council,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I would like to submit the following comments on agenda item C-1: Halibut charter management.

Immediate Action: As you are no doubt aware, the charter halibut fleet over-harvested their Guideline Harvest Level (GHL) by 47% or 680,000 pounds in area 2C this season. This record overage resulted in the 2C Constant Exploitation Yield (CEY) being exceeded, causing conservation concerns among the fleet and IPHC managers. I am sure the Council shares this conservation concern and recognizes the economic impact the 680,000 lbs (\$2.7 million ex-vessel) reallocation will have on the commercial fishermen, processors, and Southeast communities.

At the close of the 2005 season, the Council recommended a number of management measures to control charter harvest to the GHL. These included a five fish annual limit for charter clients and a halibut non-retention requirement for charter skippers and crew. The first regulation was to be implemented by NMFS; the second by ADFG through Board of Fisheries designation of emergency order authority. At the April 2006 meeting, the Council by unanimous vote again committed to managing the charter fleet to the GHL:

"The Council compliments the Stakeholder Committee on its work and encourages it to continue. As part of its plan to develop long-term solutions, the Council urges the Committee to consider a package of a modified GHL that moves with abundance, some form of separate accountability, and the provision of the proper management tools to management agencies so that each sector of the halibut fishery can be managed not to exceed its allocation. In the meantime, the Council commits to using a combination of Federal and State authority to manage each sector, charter and commercial, to the allocations established by the GHL published in the Federal Register until superseded by the Council's long-term guided sport halibut sector plan."

(NPFMC minutes from April Council meeting. Motion made by Arne Fuglvog, seconded by Roy Hyder, and carried without objection.)

To date, both the 5 fish annual limit and the non-retention requirement for charter skippers and crew have proven ineffective at addressing charter harvest—the first due to data confidentiality issues between ADFG and NMFS (and NMFS' unwillingness to implement a federal monitoring system); the second because ADFG recently announced that skipper and crew fish has not been reported as charter harvest, as the Council and staff have been led to believe for the past six years, but as sport harvest. As a result there are currently no even potentially effective management measures available under the normal rule-making process to control charter harvest for the 2007 season.

As a result of these unforeseen occurrences, ALFA respectfully urges the Council to initiate an Emergency Rule at this meeting to implement catch controls on the charter harvest for the 2007 season. ALFA has also recently learned that the conservation impacts resulting from the charter overage may allow the IPHC, in consultation with the Council, to implement harvest control measures enacted under the Commission's authority. Using either an ER or IPHC authority, the Council can have catch controls in place for the 2007 season and live up to the commitment it made by unanimous vote earlier this year.

Management tools available to the IPHC include an in-season closure or a reduced bag limit for charter clients during all or part of the season. These same tools may be reachable through the Council's ER authority. Without question, these actions are justified given the magnitude of the overage, the attendant conservation concerns, and the extensive allocation impacts associated with the inability of the Council, ADFG and NMFS to enact an effective harvest control mechanism on a timely basis.

For thirteen years ALFA has asked the Council to create a management plan that stops the open-ended reallocation of halibut from the commercial to the charter fishery. The Council has walked down numerous dead-ends, reversed direction, rescinded an elegant management solution and re-analyzed the analysis to a spectacular degree. And yet the reallocation continues. The re-allocation has now grown to such a level that the commercial fleet can no longer buffer conservation impacts. Clearly the Council needs to exercise any available timely management option. An Emergency Rule or IPHC regulations offer an effective and reachable tool for controlling charter harvest to the GHL. The Council needs act immediately and decisively to use one or both of these tools.

Intermediate Action: moratorium, delegation of authority to the State and separate accountability: Once the immediate conservation and allocation impacts are addressed, the Council needs to move quickly toward a long-term management strategy. If the Council is not yet prepared to identify and expeditiously develop and implement a long-term management strategy, then interim measures may be needed. The Council should be clear on the costs (including staff time) and benefits of each interim management alternative.

While a moratorium will provide a measure of stability to the halibut charter industry, it will not address charter overages. Analysis conducted by Council staff over six years

ago concluded that half the charter fleet operating at 2/3rds capacity could harvest the entire GHL in 2C. Since then, capacity has only increased, making the benefits of a moratorium somewhat marginal.

Limited delegation of authority to the State may provide an interim management structure, but can not be in place for another two years—and then only if Congress, the Council, and the Board of Fisheries each act quickly and in concert with each other. Since the Council can control only a small part of that process, it is essential that other management strategies be explored concurrently.

ALFA suggest that whether or not the Council elects to support delegation of authority to the State, that the Council simultaneously explore a federally implemented and monitored catch sharing plan similar to the management strategy in place in Washington State. A catch sharing plan would allow annual adjustments to the charter control measures, tightening or liberalizing them as harvest rates indicate, with NMFS responsible for monitoring and enforcing compliance.

Any of these interim strategies should be accompanied by Council and IPHC implementation of separate accountability. Separate accountability (SA) will uncouple the two sectors, making halibut management consistent with Council management of other sector allocations (e.g., the Bering Sea cod allocation adopted when the Council last considered SA). SA will end the practice of directly penalizing the commercial industry for charter overages and allow managers to capture catch accounting changes on a real time basis.

Again, interim measures are only necessary if the Council is not yet ready to commit to an effective long-term management strategy.

Long-term management plan

ALFA has long maintained that the charter industry should identify the long-term management strategy most acceptable to their industry, provided that strategy ends the uncompensated reallocation and the allocation battles before the Council. Clearly an IFQ system addresses both these concerns, plus allows charter operators to design and control their own businesses. A number of other share systems currently under discussion within the industry may also be acceptable to both sectors. What matters to the commercial industry is that the Council remember the commitment made last April—to manage the charter industry to the GHL published in the federal register until superceded by a long-term management strategy—and move quickly and decisively toward an effective, implementable long-term resolution. CEY overages, GHL overages, and uncompensated reallocations must stop.

Summary

Thirteen years of Council ambiguity, reversals, and dead ends has undermined the commercial halibut industry's confidence in the Council process. The Council has repeatedly committed to managing the charter industry to the GHL, and yet the GHL has now been exceeded in both 2C and 3A. Most recently, the Council committed to


controlling charter harvest to the GHL until the GHL is superceded by a long-term management strategy; ALFA expects and believes that the Council will live up to this commitment. ADFG and NMFS tools have failed to control charter over harvest; that over harvest has now created a conservation concern in 2C by causing the CEY to be exceeded. In order to live up to its commitment and prevent the current situation from repeating next year, the Council needs to act through either an Emergency Rule or endorsement of IPHC authority and implement effective management measures for 2007.

ALFA reminds the Council that the neither the moratorium nor delegation of authority to the State can be in place quickly enough to address immediate conservation and allocation concerns, and that the moratorium is not designed to address either. If the Council chooses to pursue delegation of authority to the State, a federally monitored and enforced catch sharing plan should be developed concurrently. Separate accountability should be part of the interim management package.

Finally, the Council needs to move quickly toward a long-term management strategy that addresses conservation impacts, ends the uncompensated reallocation and balances the needs of all halibut users--from fishermen through consumers.. ALFA still considers charter IFQs to be the most elegant management solution, but is willing to consider other charter industry supported strategies if they effectively address these issues.

Thank you for your time and attention. Please do not hesitate to contact me for further clarification of ALFA's position.

Sincerely,



Linda Behnken

(Director, ALFA)

Madam Chair Stephanie Madsen
NPFMC
605 West 4th St.
Anchorage, AK 99501

RECEIVED

NOV 24 2006

N.P.F.M.C.

Madam Chair and other members of the North Pacific Fisheries Management Council:

My name is Carter Hughes and I am a Southeast Alaska salmon troller that has purchased halibut quota share during the eleven years since the IFQ program has been implemented. I am ported out of Pelican and halibut long lining and salmon trolling are the two most important fisheries for the small boat fleet that fishes in that area.

I invested in halibut IFQs at great expense because I had long lined halibut prior to IFQs but, being a deckhand, was not included in the initial allocation. Purchasing halibut IFQs was the only way I could continue to access this resource and maintain some diversity in my fishing operation by utilizing a fishery I was familiar with.

Since then I have witnessed the unchecked expansion of another commercial user group, the charter fleet. I have testified at numerous NPFMC meetings since 2000 in favor of placing constraints on the charter fleet, in particular IFQs. I was present a year ago when the NPFMC decided to rescind the years of work that had been done on establishing the charter IFQ program. At that time the NPFMC decided to support ADF&G Commissioner Campbell's alternative motion to look at other methods that might be used control the charter harvest and keep it within the GHL. Some of the concepts discussed were:

- limiting the annual take of charter clients,
- limiting the trips per day made by a charter boat,
- prohibiting the harvest of halibut by the skipper and crew of a charter boat while chartering,
- implementing a tag program that would create a pool of money that could be used to purchase longline IFQs and transfer it into the sport sector,
- implementing a moratorium on entry into the charter halibut fishery.

I'm sure there are other details I am forgetting.

At this point nothing has been done to implement any of these measures, except perhaps the skipper and crew harvest. The GHLs in 2C and 3A have been exceeded, in 2Cs case by 47%. Not only has 2Cs GHL been exceeded, but so has its TAC. Any claim that the charter fleet does not represent a conservation threat in 2C is no longer valid. Yet, there is no sign of willingness to deal with this problem from all management bodies, ADF&G, NMFS, or the NPFMC.

I am writing this testimony to you to ask you to take the initiative in constraining the growth of the charter fleet and hold them to their current GHL. I advocate the implementation of a one fish bag limit for the entire season in 2C and part of the season in 3A. I also support the implementation of a defined quota for the charter group that they must stay with in. Finally, if they need to grow, then the IFQ option should be seriously revisited. At the very least, the tag program should be implemented immediately. Something must be done before the 2007 season.

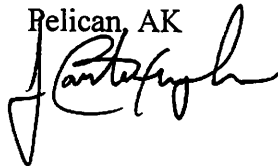
Frankly, this mess reflects poorly on all IFQ systems. Considering some of the rationalization disasters that have occurred recently, the integrity of the concept as a fisheries stabilization and conservation tool in general is questionable. However, the system is still salvageable if the right decisions are made.

Thank you for your consideration,

Sincerely, Carter Hughes

F.V. RADIO

Pelican, AK

A handwritten signature in black ink, appearing to read "Carter Hughes". The signature is written in a cursive style with a large, stylized initial "C".

Charles E Wilber
705 Etolin
Sitka, Alaska 99835
cwilber@gci.net

Chair Stephanie Madsen
NPFMC
605 W 4th St
Anchorage, Ak 99501

Dear Stephanie,

Last year, during it's December meeting in Anchorage, the Council expressed serious concern over the growing Halibut catch of the charter fleet. Pledges were made that this problem was getting out of control and measures would be taken to slow down the charter catch and stay within the GHL. A year later we now find that the charter fleet has exceeded the GHL by 47% in 2C and 10% in 3A. This cannot continue without severe economic consequences to the Commercial IFQ fleet! The Council, NMFS and ADFG have all failed to control the charter harvest. The lack of restraint on the Charter fleet has lead to the biggest quota overage in the history of the charter fishery and resulted in an alarming uncompensated reallocation of Halibut from the commercial Long Line fleet to the Charter fleet. The really frightening part is that there is currently no management action in process to limit charter harvest.

The Council needs to limit the Halibut charter catch to the existing GHL.

- The Council should do what it said it would do last year-**limit the Charters to their GHL**
- The Council needs to take control of this runaway fishery by implementing a one fish bag limit for charter clients
- The Council must establish separate accountability between the charter and commercial fleets so the long line industry will not be punished for charter overages
- The Council must realize that a charter moratorium will not solve the ongoing reallocation of Halibut

I've been Long lining Halibut for over 23 years and the current lack of management for the Halibut charter industry threatens all other users of this valuable resource. I've been watching my considerable IFQ investment slowly eroding, without compensation, into the unregulated Charter fishery. My concern grows for young people who will have to think very hard about investing in an industry that is slowly being taken away from those who depend on it.

Sincerely yours,



Charles E Wilber
Chairman Seafood Producers Cooperative

RECEIVED

NOV 24 2006

November 20, 2006

Stephanie Madsen
NPFMC

N.P.F.M.C.

My name is Bert Bergman and I live in Sitka with my wife and two young children. I own 6500 lbs of 2C halibut. I have served on the Board of Directors of Seafood Producers Cooperative (SPC) for 11 years and currently hold the title of Vice President.

I am here to testify for SPC about the on going halibut allocation battle between the commercial and charter industry. SPC is the largest and oldest cooperative on the west coast with a long history of halibut production. At one time our name was the Halibut Producers Coop. SPC buys halibut from Bellingham to Dutch Harbor although most of our production comes through our plant in Sitka where we make fresh, frozen, and value added products. In 2006 SPC landed 2,100,000 pounds of halibut with a sales value of 11 million dollars. We have 243 members that own halibut IFQ.

SPC is important to the communities where we operate. Raw fish tax helps fund city infrastructure that supports all marine industries. Our Sitka plant purchases hundreds of thousands of dollars in utilities from the City of Sitka every year. Our annual expense in labor is over 1 million dollars in Sitka alone. In addition, significant sales tax money is collected from fishing related expenses. Many of our members, like me, are year around Alaskans who support homes and families with halibut money. Halibut is an important part of a diversified marine economy that funds gear stores, marine tradesmen, local fuel docks, harbor facilities and local airports. All services that the charter fleet also needs.

It seems like the allocation war between charter and commercial is never ending. Think of how many times the council has heard testimony on this issue. Everyone making the same no winner argument about whose family is most deserving. Without a comprehensive solution this dog and pony show will likely go on forever. Charter IFQ's would provide a free market solution that will give the charter fleet an option for growth. One way or another something must be done.

As you may know the charter fleet has gone over its allocation in 2C by over 40%. This overage exceeded the total allowable catch for 2C. There can be no denying the charter fleet's rapid growth. Please take some action to hold the charter fleet within its allocation as promised.

I'm no lawyer, but I have heard that if management of the halibut resource is turned over to the state that Alaska would be able to set different bag limits for residents and nonresidents, something that the council can not do. If this is not possible than a 1 fish bag limit may be the only solution to keeping the charter fleet within it's allocations.

Thank you for your service to public process.

Bert Bergman



RECEIVED

Dan Falvey---F/V Myriad
123 Anna Dr., Sitka AK 99835

November 21, 2006

NOV 27 2006

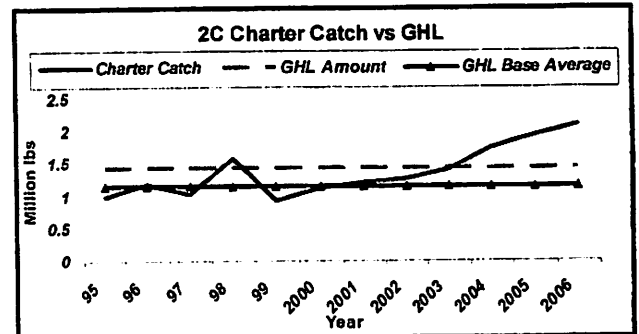
SENT VIA FAX & MAIL

Dear Council, AP and SSC members, **N.P.F.M.C.**

I would like to offer the following comments on Agenda Item C-1, Charter Halibut Management. As you are all aware, the numbers recently released by ADF&G indicate that the 2005 charter halibut harvest in Area 2C was the highest ever recorded. The 2006 projections are even higher still; indicating the charter fleet harvested some 2.1 million lbs or 680,000 lbs over their GHL allocation. **The direct result of this GHL overage will be a 680,000 lbs (\$2.7 million) deduction from the commercial quota in 2007.**

When the IFQ program was rescinded in Dec 2005, the Council made a commitment to restrain the Charter catch to the GHL during this interim period. Commissioner Campbell said:

"... the important point I want to make here is we're very, very, aware of the concern about exceedance of the GHL and that we believe that for the short term, we have the tools to deal with that. And the short term, actually quite a number of years as it takes to resolve the situation with a longer term." Commissioner Campbell, Dec. 9, 2005; P 16, lines 19-25.



"The way we envision that something like this could work is, A, short-term under the existing GHL, we can use the tools that we have here with the one season lag to bring down the harvest." Commissioner Campbell, Dec. 9, 2005; P 53, lines 4-8.

In April 2006, the Council, by unanimous vote said **"...In the meantime, the Council commits [to] using a combination of Federal and State authority to manage each sector, charter and commercial, to the allocations established by the GHL published in the Federal Register until superseded by the Council's long-term guided sport halibut sector plan."**

Due to unforeseen circumstances, the catch controls passed at the April 2006 meeting either do not apply to the charter GHL or cannot be implemented. State management authority or a federal catch sharing plan is at least 2 -3 years away. The proposed moratorium will do little to restrain catch, and the new "long-term" solution is still unclear. I respectfully submit that allowing 2-3 more years of uncontrolled growth by the charter sector is inconsistent with the commitment the Council has repeatedly made, and will have unacceptable economic impacts on commercial fishermen, processors and SE Communities. Therefore, at this meeting I request the Council:

- Initiate an Emergency Rule and/or work with the IPHC to control charter harvest in 2007 through bag limit changes, seasonal closures or any other methods available.
- Initiate a discussion paper which provides the details of how State management authority would work, and compares this approach to a federal catch sharing play similar to the Pacific Council's.
- Analyze the long term proposals as a package so a direct comparison can be made between a share based program, a compensated reallocation plan, and an angler day or lottery program.

Sincerely,
Dan Falvey

Date: November 24, 2006

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

Dear Ms Madsen,

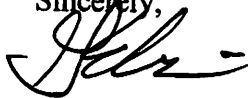
I am very concerned that the halibut charter fleet has once again exceeded the GHL and is eroding the value of my family's commercial quota share. This is unacceptable. My wife, two sons and I have all purchased quota shares.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL and there is no end in sight. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets. What is the problem with keeping the charter industry within their GHL and responsible for their over fishing?

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,



George Eliason
102 Kuhnle Dr.
Sitka, AK 99835

Cc: Commissioner McKie Campbell
Alaska Department of Fish and Game

Mr Jim Balsiger
Alaska regional Administrator
National Marine Fisheries Service

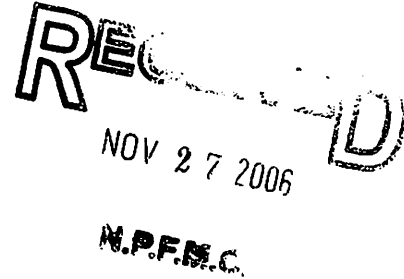


SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

November 22, 2006

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



Dear Madame Chairman and Council Members:

Seafood Producers Cooperative is the oldest and largest fisherman owned cooperative in the United States. Over 300 of our 512 Alaskan fisherman owners have invested in the IFQ longline fishery. Many of our owner/fishermen made these investments based upon the stated intention and direction of the NPFMC to introduce accountability to the charter fleet.

Upon rescinding the 2001 IFQ charter plan the NPFMC committed to managing the charter harvest to the GHL until a long-term management strategy is implemented. The measures approved by the Council, annual limits and skipper/crew retention elimination were not implemented. The NPFMC, NMFS and ADFG have all failed in efforts to manage the charter harvest. In 2006 the GHL was exceeded by 47% in 2C and 10% in 3A. In 2005 the GHL was exceeded by 36% in 2C.

Unmanaged continuation of this trend will severely impact the commercial fishing industry. The 2006 GHL overages in 2C and 3A equal almost a million pounds. The commercial fishing industry will once again pay the price for lack of accountability within the charter fleet.

SPC urges the Council to take control of the fishing by implementing a one fish bag limit for charter clients; establish resource management accountability within the charter fishery and impose the moratorium, but recognize that a moratorium will not address the reallocation issue. An IFQ solution remains the best long term solution. Since the establishment of the IFQ program, the commercial fleet has not exceeded their quota.

We support the efforts of the Stakeholder Committee and urge the Council to restore credibility and integrity to the Council process.

Sincerely,

Tom McLaughlin

President/CEO
Seafood Producers Cooperative

Stephanie Madsen
NPFMC
605 W. 4th St.
Anchorage, AK. 99501

REC-1-D

NOV. 20, '06

NOV 27 2006

N.P.F.M.C.

I urge the Council to do something about the unrestrained charter industry and the heavy GTH overages in the halibut fishery, esp. in area 2C.

Take control of the fishery by implementing a one fish bag limit for charter clients.

Establish separate accountability ending the untenable taxing of the longline industry to pay for charter overages. This situation is so unjust it borders on criminal. The commercial sector is being robbed by the charter sector with the complicity of the regulatory agencies. Please act at this meeting.

Please recognize that the charter moratorium will not address the ongoing reallocation and that IFAs remain the best long term solution to this serious problem.

Sincerely,
Scott Visser

SCOTT VISSER
HC-60 #2842
HNS, AK. 99827

Paul G. Southland
PO Box 257
Wrangell, AK 99929

November 24, 2006

North Pacific Fishery Management Council
Stephanie Madsen, Chair
605 W 4th Ave., Suite 308
Anchorage, AK 99501-2252

Fax 907-271-2817

RE: Halibut Charter Issues C-1

Dear Stephanie Madsen and Council Members,

I am a commercial halibut IFQ fisherman in area 2C with approximately 16,000 pounds. Halibut is an important part of my overall fishing income.

In the Dec 2005 and April 2006 Council meeting you stated that it was the council's intention to manage the charter industry to stay within the GHIL while a long term solution is developed. I ask that you uphold that promise by either implementing an emergency regulation or writing the IPHC to lower bag limits in area 2C & 3A as appropriate to constrain the charter fleet to their assigned GHIL so that the halibut resource does not face conservation issues or allow continued erosion of commercial IFQ shares that have been purchased. Since the IFQ program was implemented the commercial fleet has not exceeded their quota, we have to live within our quota share and the charter industry should be made to live within their GHIL established by the Council. We support the long term solution which allows for compensated reallocation. We support the efforts of the charter halibut stakeholder group and agree that a moratorium is important.

The United States government through it's fishery management council process has been unable to restrain the growth of the charter industries exploitation of the halibut stocks, particularly in areas 2C and 3A. The commercial halibut industry has diligently worked to resolve this issue. We, the commercial fishery, **SHOULD** not be penalized.

Please, communicate to the IPHC the need to lower the bag limit for charter halibut in order to protect the resource.

Sincerely,



Paul G. Southland
F/V Alpha Dawn
F/V Bristol Dawn.

RECEIVED
NOV 27 2006
N.P.F.M.C.

November 27, 2006
PO Box 401
Wrangell, AK 99929

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

RECEIVED
NOV 28 2006
D

Dear Stephanie and Council Members,

N.P.F.M.C.

My name is Brian Merritt and I have been an Alaskan commercial fisherman for 30+ years. My halibut quota is in area 2C and is approximately 13,000 pounds. About half of my commercial fishing income comes from halibut. I am also a gillnetter in the Wrangell area. As you know, the charter fleet is growing unchecked and they are going over their GHL for halibut. I am asking you to continue working on a solution to the growing charter fleet. A possible short term solution would be to lower the bag limit for charter clients, I would suggest one per customer. However, a long term solution needs to be found for the growing charter fleet, such as a moratorium or limited entry like I had imposed on me when I entered commercial fishing long ago.

When the charter guys go over their GHL, the overage is taken from the halibut quota holders. I shouldn't have to lose income due to increasing charter fisherman. I bought half of my current halibut quota at top dollar and it is slowly decreasing in value due to less quota being issued to me. Thank you for the time you've spent on the board and attending to this matter.

Sincerely,

Brian Merritt
Brian Merritt
FN Sharlene C

November 28, 2006

Christopher W. Hashiguchi
P.O. Box 2626
Sitka, AK 99835
(206) 419-1880
guch_fish@hotmail.com

North Pacific Fisheries Management Council
605 W 4th Ave suite 306
Anchorage, AK 99501
Fax: (907) 271-2817

RECEIVED
NOV 28 2006
N.P.F.M.C.

To Whom It May Concern:

I am a charter fisherman and the business owner of LegaSea Fishing Charters out of Sitka, Alaska. I have operated charter boats in Sitka since 1995 and operated my own business there since 2000.

I have some serious concerns over the current situation occurring in the Southeast Alaska fisheries management. My initial concern is that the charter fishing industry does not have adequate representation on the management council. This situation is not acceptable by any standards. The number of charter operations currently running in Alaska demands that a minimum of at least one representative for the charter fishing industry on the council. It is time for change and the charter industry needs to be represented and participate in the management plan.

My second major concern pertains to the situation with the Guideline Harvest Level(GHL). Sport fishing and charter fishing allocation should be combined with the rest of the management numbers. Charter fishing is providing access to a public resource. There is no reason for these two entities to be separated. Sport fishing is a significant industry in Alaska and the lower Forty Eight.

The significant increase of the charter fishing fleet over the last ten years requires there be a change in the management plan, especially for area 2C. A lack of representation of the charter/sport fishing industry at the management level disenfranchises this group and will have detrimental effects for all the people involved. If we do not begin to change the current management practice there will be a decline in the quality of this resource. I have heard these concerns throughout the industry among numerous sport fishermen who I have spoken with about the subject.

I realize that the council has many difficult tasks, but if some changes are not made to the current management programs, the Alaskan fishing industry will be impacted by the loss of revenue generated by the charter industry.

Sincerely,



Christopher W. Hashiguchi
Owner, LegaSea Fishing Charters

Petersburg Vessel Owners Association

P.O. Box 232
Petersburg, Alaska 99833
Phone (907) 772-9323

November 15, 2006

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501



Dear Ms. Madsen,

Petersburg Vessel Owners Association is a diverse group of commercial fishermen based in Alaska. We participate in a variety of fisheries statewide with our foremost interest being the commercial longline fisheries managed by the North Pacific Fishery Management Council.

As the Council is aware, the 2C halibut charter catch is estimated to be over the Guideline Harvest Level by approximately 46% in 2006 and the 3A halibut charter catch is estimated to be approximately 8% over the GHL for 2006. The commercial halibut fleet should no longer be held accountable for the charter sectors' overage.

With the halibut harvest exceeding the CEY, this issue is now about conservation. At the April 2006 Council meeting, the following motion was passed: *"In the meantime, the Council commits using a combination of Federal and State authority to manage each sector, charter and commercial, to the allocations established by the GHL published in the Federal Register until superseded by the Council's long-term guided sport halibut sector plan."*

The PVOA respectfully requests that the Council implement appropriate management measures including a bag limit for charter anglers to help conserve the halibut resource. Commercial halibut fishermen operate within the constraints set by the IPHC and NMFS. Management measures on the halibut charter fishery, including bag limits, need to be implemented in order to stay within the constraints of the GHL.

We believe the Council should continue to consider implementing the charter moratorium and separate accountability for the charter and commercial fishing fleets. The Council should also continue to examine delegation of management authority to the State of Alaska in order to obtain a more comprehensive and clear picture of the resulting management processes, jurisdictional issues, specific responsibilities, and interactions between the Council and the State.

The PVOA would like to thank the Council for their continued attention to this issue. The halibut fishery is of critical importance to the PVOA. If you have any questions or comments regarding this issue please feel free to contact us.

Respectfully,


Julianne Curry
Director

November 26, 2006

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

Fax 907-271-2817

RE: Halibut Charter Issues C-1

Dear Stephanie Madsen and Council Members,

I am a commercial halibut IFQ fisherman in area 2C with approximately 12,000 pounds and area 3A with approximately 8,000 pounds. Halibut is an important part of my overall fishing income.

In the Dec 2005 and April 2006 Council meeting you stated that it was the council's intention to manage the charter industry to stay within the GHIL while a long-term solution is developed. I ask that you uphold that promise by either implementing an emergency regulation or writing the IPHC to lower bag limits in area 2C & 3A as appropriate to hold the charter fleet to their assigned GHIL to insure halibut resources do not face conservation issues other than by the continued erosion of commercial IFQ shares. Since the IFQ program was implemented the commercial fleet has not exceeded their quota, we have to live within our quota share and the charter industry should be made to live within their GHIL established by the Council. I support efforts for a long-term solution, which allows for compensated reallocation.

Wayne Stauffer
F/V Distant
3285 Fritz Cove Road
Juneau, Alaska 99801
907-789-0715



RECEIVED

NOV 29 2006

N.P.F.M.C.

RECEIVED
NOV 29 2006

N.P.F.M.C.

Steve Fish and Kari Johnson
P.O. Box 6448 Sitka, Alaska 99835
907-747-6042
Ms. Stephanie Madsen, Chair
North Pacific Fisheries Management Council
Anchorage, Alaska
Fax 907-271-2817

Re: Halibut Charter Management

Dear Ms. Madsen and Council Members,

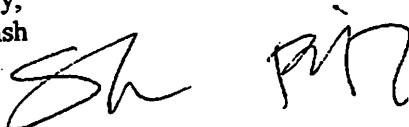
I am writing on behalf of myself and my wife. We live in Sitka and longline halibut and Black Cod. We did not receive any 2C halibut on initial issuance, and have invested a significant amount of our personal assets in 2C halibut since then. We have borrowed money from the bank, paid interest and basically trusted in the fairness and sustainability of the management system to protect our investment. Naturally, it is disappointing, to say the least, when due to lack of management, the relatively unregulated commercial halibut charter industry is allowed to take fish directly from us as they exceed their own quota. They just fish away and grow their industry with impunity while we, the commercial longliners, who have taken responsibility and care for the halibut fishery for decades, pay their bills. Could this be right?

We need separate accountability now. How can the North Pacific Management Council, arguably the darling of the council system, the example others point to for some examples of how to do things right in fish management, allow this continued reallocation from a long proven accountable, responsible user of the halibut resource to a new and growing user group which fights accountability at every turn? What is it about accountability that you resist applying to the halibut charter industry? It is obvious that it is to the advantage of the halibut charter industry to delay any meaningful action to bring them into responsible management as they may gain leverage to increase their share of the take. After all the deliberation and council action over the last 13 years, it is time that the council stood up and took meaningful action to apply accountability standards that the rest of us must live with, to the halibut charter industry.

I ask that the council adopt a one fish bag limit for the halibut charter industry for area 2C for the entire season and for area 3A for the month of August. This would almost bring the charter fleet within its allotment under the GHIL in areas 2C and 3A, and would put the onus and the pressure to come up with a long-range solution where it should be: on the halibut charter fleet. Further, I ask the council to establish separate accountability for the commercial halibut charter industry. They need to be accountable for the fish that they take, and have consequences for overages as well as carry over for underages.

Thank you for your work on this issue. Hasn't it gone on long enough?

Sincerely,
Steve Fish



**FISHING VESSEL OWNERS' ASSOCIATION
INCORPORATED**

ROOM 232, WEST WALL BUILDING • 4005 20TH AVE. W.
SEATTLE, WASHINGTON 98199-1290
PHONE (206) 284-4720 • FAX (206) 283-3341

SINCE 1914

November 27, 2006

RECEIVED
NOV 27 2006
N.P.F.M.C.

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

RE: Staff Recommendations, Review discussion paper on allocations/shares and committee report, and action as necessary (C-1) (f)

Dear Chairwoman Madsen;

On behalf of the members of the FVOA, we are submitting the following comments regarding the staff recommendations for structuring charter Halibut Harvest alternatives.

First Analysis – Final action in April 2007 9 (Moratorium)

This option cannot be viewed by the Council as a short-term solution to the current charter boat over catch of the GHL in Area 2C and 3A. It does not appear at this time that the Council will have significant minimum participation thresholds available for final action regarding this option. However, some more limiting general options are identified by the staff to add at the December meeting. FVOA sees the moratorium (limited entry) option as a 3-5 year work in progress before any meaningful effect on over-capitalization is realized. The members of the FVOA see the second analysis provided by the staff, final action to be announced, to be a higher priority. We therefore request that the second action, which would be a hard allocation between sectors, be moved to a priority higher than the charter moratorium action.

Second Analysis – Final action to be announced.

The members of FVOA believe this option has eclipsed the Council's charter moratorium action for importance. The Council, under agenda item C-1C, will be looking at language to amend the Halibut Act relative to sports regulations authority. Currently, the Council's approved Guideline Harvest for the charter sector is not considered a hard allocation and therefore the State of Alaska would have no legal requirement to pursue meaningful restrictions on the charter fleet to stay within the approved GHL allocation. Our members see no advantage of providing a state regulation authority if there is no legal obligation to manage to a charter sector allocation. Therefore, we request that the

Council take final action on a hard sector allocation for the charter boat industry as soon as possible.

In summary, the Council should schedule a final action for a sector allocation to the charter boat industry if it intends to support amending the Halibut Act to grant sports management authority to a given state. In the interim, the Halibut Commission, under its existing authority, can change bag limits and seasons on the sports industry, both angler and charter. However, the Commission has indicated to us if they wanted to impose a different charter bag limit from that available to the independent angler, they may not be able to discriminate between the two sectors of sport without a sector hard allocation. Council action on a hard allocation for the charter sector is needed in order to provide the legal requirement to a State in order to manage to a given CAP. A GHM may not be adequate.

Action 3 –Sharebased Systems

The members of the FVOA have, in the past, supported an IFQ format for the charter sector. Unless there is significant charter support for this option, we recommend that it be dropped. We do believe a QS option that would allow an approved group or the State of Alaska to purchase QS in 2C and 3A be developed whereby this would be the future market based method of allocation between the charter and commercial sector. In this type of option, the State would then make the QS that they purchase available on a regional basis to the charter industry. This type of option does not need a moratorium to proceed and we would recommend this option take precedent over the development of a moratorium.

In summary, we support a moratorium for the charter fleet but it must be recognized that at best, such a provision will not be enacted for 3 to 5 years and will not have a material impact on the harvest within the charter sector unless significant minimum threshold alternatives are included. We therefore do not give this action a high priority.

We support a hard allocation between the commercial and charter boat sectors for two reasons. The first is it legitimizes any granting of authority to a state to manage to a given sector's allocation, and second, it gives more flexibility to the IPHC to discriminate between harvest sectors when bag limits and/or the seasons are needed for the sports industry.

Lastly we support only that QS option that involves the states ability to purchase commercial QS in 2C and 3A and transfer the purchased quota to the charter sector. If there is not significant support from the charter fleet for a QS option among themselves, we suggest it be dropped.

Sincerely,



Robert D. Alverson
Manager

RDA:cmb

Leslie R. Howard
1617 Foxmeadow Ct.
Los Banos, CA 93635

North Pacific Fisheries Management Council
605 West 4th Ave., Suite 306
Anchorage, AK 99501-2252

November 26, 2006

Honorable Council Members,

It has been brought to my attention that you are taking testimony and considering how to allocate the Pacific halibut resource while maintaining, or if possible maximizing the long term sustainable yield.

Since 1994, I have made several trips to Alaska to fish for halibut from charter boats. This recreational pursuit is expensive (airfare, food, lodging, license, etc.), but how I wish to spend my disposable income in my retirement years. I most certainly enjoy consuming the halibut I catch after it has been locally processed, frozen and shipped to my home. However, I have never purchased commercially caught halibut from a market which would obviously be much less expensive per pound.

I am concerned you may unnecessarily restrict my access to this recreational pursuit and resource in an effort to maintain or increase the commercial take. I realize the fish are valuable, as witnessed by my reluctance to purchase it at market, and that people's jobs and income are dependent on the commercial harvest.

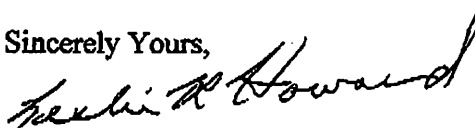
I believe the American public's desire to directly participate in the harvest is widespread and strong. During my trips on Alaskan charter boats I have met people from many of the eastern states and foreign countries that were there for the same reasons as myself. It is important to foster this participation to educate the public and increase support for sustained yield management of halibut and all other ocean species.

The number of persons able to directly participate in the recreational harvest will increase as more baby boomers such as myself retire to pursue their lifelong dream of traveling and fishing for great species not found near home.

The United States has a long history of fish and wildlife conservation that has supported the continued recreational harvest when stocks were no longer sufficient to meet everyone's desire for take. This has been true for waterfowl, deer, elk, and many species of inland fish that once supported a commercial harvest as well.

I request, in making any decision on the future allocation of the Pacific halibut resource you provide for the public's desire and expanding capability to participate in recreational harvest through a sufficiently large allocation to the charter fleet.

Sincerely Yours,



David J Geis
PO Box 70963
Fairbanks, Alaska 99707

Ms. Stephanie Madsen, Chair
NPFMC
605 West 4th Ave, Ste 306
Anchorage, Alaska 99501
November, 29th 2006

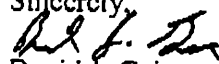
RECEIVED
NOV 29 2006
N.P.F.M.C.

Dear Ms. Madsen:

I am a sport fisherman who fishes the waters of Prince William Sound. I contract out with halibut charter boats on a yearly basis in order to fill my freezer with fish. Today I was made aware of the Commercial Fishing Industries proposal to limit the Charter Boat Operators to catch only 1 fish per client. I am strongly opposed to this measure for the following reasons:

1. If this measure is adopted it will destroy the Charter Fishing Industry. I spend at least \$1,000 to fish for halibut (food, fuel, lodging, charter cost). I go on a 2 day trip and if I am lucky will return with 4 halibut. I will not spend \$1,000 to catch only 1 fish!
2. I have friends who live and work in Valdez and this proposal will severely impact the local economy. Sport fisherman traveling to Valdez spend a whole lot of money there. A 1 fish limit will keep most of them away.
3. The fisherman that do fish under a 1 fish limit will target the bigger fish which are the breeding females. Smaller fish that would normally be kept will be released, many of which will probably die as a result of their capture. The resource that you are trying to conserve will be depleted even more.
4. As a resident of Alaska, I believe I should have a **PRIORITY** right to the resources of my state, commercial interests should be secondary. In times of shortage, my needs should come first. The NPFMC should buy up and withhold from the market some of the allocated halibut quota from the commercial industry. This action alone would insure enough fish to satisfy the sport fisherman.

In conclusion, I would strongly suggest that you listen to and implement the recommendations of the Halibut Charter Fishing Industry concerning this issue. They represent thousands of sport fishermen, all of whom have a vested interest in conserving the halibut resource.

Sincerely,

David J. Geis

WHITTIER MARINE CHARTERS

P.O. Box 2693, Soldotna, AK 99669
www.fishwhittier.com 907.440.9510

RECEIVED
NOV 29 2006
N.P.F.M.C.

Ms. Stephanie Madsen, Chair
NPFMC
605 W. North St.
Anchorage, AK 99501

Ms. Madsen and members of the Council,

This letter is in reference to the sport charter halibut issue.

At thirty two years old, this was my ninth year in the industry and my fourth season as a business owner in Whittier. Currently, I am the busiest operator in Whittier with about 100 halibut trips per year. I have no other career, this is my livelihood. I ask you to please proceed carefully in dealing with this issue.

Any actions which compromise the length and/or predictability of our season will be detrimental to serious, full time operators. While part timers may be able to deal with unstable seasons, operators like me depend on the ability to operate all season, and to book clients far ahead of time. Many of my customers travel to Alaska year after year for the opportunity to harvest two halibut each time they fish with me. A number of them have voiced concern over this issue and have confessed that they would not be able to justify coming to Alaska if they no longer had this opportunity. Please only consider long term solutions which maintain the quality as well as the duration of the traditional fishery. A one fish limit anytime during the historic season will most likely put me out of business.

I support stakeholder the stakeholder recommendations of: a State of Alaska delegation of management for guided halibut fishing and the stakeholder moratorium/limited entry program.

Thank you for your time and consideration.

Mathew Kopec

Whittier Marine Charters

Ms. Stephanie Madsen, Chair
NPFMC
605 West 4th Ave, Suite 306
Anchorage, Alaska 99501


November 29, 2006

Dear Ms. Madsen,

The Halibut Charter Management put forth by the NPFMC for the past 15 years leaves a great deal to be desired. Lack of positive and lasting action on the council's part has put the long time charter operators in a desperate position. Action on your part, to preserve the long time halibut charter operator, must occur now.

1. I ask for the council to immediately move forward on the Stakeholder Committees Moratorium/Limited Entry Program.
2. Set a threshold for participation at 10 ADF&G logbook halibut days as a minimum.
3. Move forward with the State of Alaska delegation of management for guided halibut.
4. A one fish limit will destroy the Prince William Sound Halibut Charters. **Do not consider any such proposal.**

Sincerely


Patrick M. Bookey
Luck of the Irish Charters
P. O. Box 55194
North Pole, Alaska
99705

RECEIVED
NOV 29 2006
N.P.F.M.C.

RECEIVED

NOV 29 2006

N.P.F.M.C.

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252

Subject: Sport fishing Moratorium Considerations

I have lived in Alaska for the last 30 years and fished for halibut on a charter boat for the last 13 years. My kids have gone out fishing and now that my grandkids are old enough, they also enjoy going out to catch halibut. Because of their future rights to catch halibut, I have an interest in your management policies. I have recently been made aware that the North Pacific Fishery Management Council is in the process of continuing its effort to allocate the halibut fishery amongst the users of this valued public resource and the Council is contemplating a moratorium on sport charter fishing.

I assume that through the federal legislation, that this public resource is managed by you under the "public trust doctrine" whereby every effort is made to assure access and use by the public at large. The remaining available stock that can be taken without jeopardizing the health of the fishery is allocated to commercial fishing under a permit allocation system. (A permit I assume means that it is subject to revocation and possibly re-issuance at various levels when it is necessary to redistribute the public resource in a "fair and equitable" fashion.

It seems that the current proposed moratorium is being introduced to terminate the sport fishing enthusiasts' ability to gain access to the public resource. Fishing for halibut on a charter boat is how the majority of the sport fishing is done by the general public that do not have the luxury of owning a boat or one that is large enough to safely venture out in the open waters to fish. I am one of those fishermen. It is not in the best interests of the American public to place its sport fishing access in jeopardy.

It is my understanding that today; the sport fishing activities remove only 13% of the available fish, while the rest is taken by commercial fishermen. This is a significant imbalance in allocation that may have been appropriate in years past. The public sporting habits and abilities are changing. The desire for the Alaska fishing experience is continuing to grow. It does not seem fair, to the public and the economy that is affected by that growth, to limit charter fishermen in this fashion. If the resource is not in danger of being over fished by the general public, why regulate it?

I would appreciate the North Pacific Fishery Management Council taking a more proactive stance on assuring that the rightful owners, the American public, are allowed to continue to have access to a fair share of the fish. A 13-87 split doesn't seem fair to me.

Sincerely,



Peggy Dreeszen
Anchorage, AK

Nuliaq Alaska Charters
P. O. Box 73072
Fairbanks, AK 99707

November 29, 2006

RECEIVED

NOV 29 2006

N.P.F.M.C.

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 206
Anchorage, AK 99501

Re: Halibut Charter Management

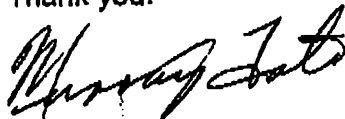
Dear Ms. Madsen,

As a 20-year charter business owner/operator in Prince William Sound, I am opposed to the proposed one-fish limit on halibut for charter operators. This proposal will cause untold damage to not only the charter fleet but also the tourism industry in all our coastal communities that cater to the charter fleet.

If the GHF overages are indeed a fact, then the most workable solution at this late date appears to be the implementation of the Moratorium/Limited entry program.

To further help in the solution of these and other Alaska halibut harvest conflicts, please consider granting the State of Alaska (ADF&G) a limited delegation of authority for management of the guided halibut sport fishery.

Thank you.



Murray Tate
Master, M/V Nuliaq

mt:pmt

Date: November 29, 2006

To: North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

From: Robert Howard, Homer, Alaska
Civil Engineer
Sports Fisherman
Charter Captain

RECEIVED

NOV 29 2006

N.P.F.M.C.

Subject: Pending Charter Moratorium

I am a citizen of the United States and resident of Alaska. I have a right to pursue fishing for halibut as a recreational and food gathering endeavor consistent with our sport fishing laws.

Summary:

- Your actions severely impact me and my family
- The halibut resource is owned by the American public
- The recreational fisherman is under represented this Council
- The charter sector as service provider to the public is under represented
- The charter and commercial sectors exist to serve the needs of the American public
- There has never been a salt water fishery overfished by the recreational fisherman
- The halibut biomass is not in jeopardy
- Commercial fishing is the primary cause of fish population decimation
- Commercial fishing wastes more fish than the recreational fishermen catch
- A 13% allocation for recreational fishing is not responsive to changing public needs
- A moratorium on the charter industry (sport fishing industry) is not warranted as a biological protection measure
- A moratorium on the charter industry is not responsive to the public's needs
- Fair and equitable allocation for the American public must be provided without compensation to the commercial sector
- The American public has first right, with public requiring subsistence harvest having first priority, the balance of the harvest could be done as commercial
- Please completely computer model this industry, with complete socioeconomic analyses of all those factors touched by the industry so the American public can make an intelligent decision on how it elects to use this valued resource for its "highest and best use".

Robert Howard

1

My interest in halibut fishing spans over a quarter of a century. I fish as a recreational fisherman from charter vessels. I fish with my own boat that I use for both charter and non charter fishing. I carry and use a commercial deckhand fishing license and have done so for the past six years. All of your actions impact me as a sports fisherman, as a charter operator, and as a commercial fisherman.

From these various perspectives, I find the American public, the owner of the halibut fishery, to be under represented on the Fisheries Management Council and every effort should be made to rectify this. I believe the importance of the charter industry to sports fisherman's interest is under represented, as this is the primary means of public access for the vast majority of the fishermen not living on the Alaska coast. I believe this Council's current deliberations about limiting the charter fishing access is premature, and should not be implemented until the fishery is being over fished.

It is asserted the charter sector takes more than it is entitled to. The charter sector does not take fish. **The recreational fishermen that use the charter service for access are taking the fish.** The charter sector is really a reflection of the American public seeking access to its fishery. The business could not exist if the American public did not want to fish.

The question is: how much fish is the American public's fair and equitable share?

The commercial fishery wouldn't exist either if there were not a resource abundance and a willing public that employs their service via the fish market.

There is no scientific proof that the fishery is being over fished. The biological assessments currently indicate that the biomass is healthy and of such abundance that the sustainable yield remains at a consistent level. From a global perspective the fishery is well managed. I submit that contrary to popular rhetoric, there has never been a saltwater fishery that has been over fished by the recreational fisherman. Our halibut fishery will be no exception to this rule. Commercial killing has always and will always be the prevailing factor in resource decimation.

The current catch by the sporting sector is a mere 13% of the fishery determined to be available for harvest. Why such a little amount? Public interest is growing every year...

The commercial fishery is killing a whopping 87%. Why so much? The number of fishermen is small. Who is doing the over fishing? Thirteen percent versus 87% is a very clear picture of who is responsible for the over kills.

Here is a startling fact to me: There is more waste inflicted on the halibut fishery by commercial fishing than is actually harvested by the sport sector. This needs to be corrected NOW. The political issue is how to achieve a sustainable reduction in waste and its enforcement program. Imagine if only we put as much energy into reducing waste in all sectors and **particularly** in the commercial sector as is being invested in trying to stop/reduce sport fishing, there would be more fish for all. The Council appears to be reluctant to touch this with a ten foot pole. I ask, Why?

The recreational charter sector catch is a political issue as well. We are becoming focused on a very small issue that being, a very small quantity of the public fishery being caught by recreational fishermen. This is being pushed by commercial fisheries to keep the spotlight off the real and permanent solution- reduction of the fish available for commercial killing so the increased demand by the public can be equitably satisfied.

Why isn't the issue of fair and equitable public resource allocation that is responsive to changing public needs on this Council's agenda? Statistics show that more and more of the owners of the fishery are seeking access to their fish.

The longliners association points out that in Area 2C the owners of the fishery harvested too many fish. I applaud the owners, the American public, in their efforts to enjoy their resource. If the owners hadn't caught their fish, the commercial sector sure would have. So what's the big deal? Recreationally, we catch the fish consistent with laws and perfectly all within our right to do so.

Who has first right to the resource? What is fair and equitable? These challenges in fairness and equity are at your door, begging for resolution.

The allocation issues being forced to the table are aimed at masking another real issue- commercial fisheries control over a public resource.

Once again, the commercial agenda appears to be that which guarantees their access to livelihood- we all wish we had that guarantee. They think they own the fish. I say this because it appears that the commercial sector are demanding that they be paid for reallocation of any fish between sectors- we seem to forget in the noise that they hold fishing permits issued by the public that are revocable without compensation. This appears to be making the public pay for a resource that it already owns.

In my estimation this is being promulgated through attempted commercial fisheries control of the fisheries management agency. There is probably more money being spent on lobbying than the "lost value" asserted for the 2C fish.

The language of "revocable permit" and "fair and equitable" found in law are apparently empty statements both in the letter and spirit of the law. Filing a Fisheries Management Plan embodying these tenements is an empty directive in the law. These elements of the law are not being carried out consistent with the public trust vested in the Fisheries Council.

Under all current proposals surrounding the charter moratorium – the apparent guiding principal is: the commercial fisherman owns the fish, and that any allocation of the resource must be made with compensation to the commercial fisherman. The public, through these various proposed schemes must "buy back" the fish they already own. Remember, the language in the permit includes the words "revocable" which is consistent with law. Additionally, the language in the law says "without compensation".

When this game started, no one paid a cent for a permit. The public allowed commercial killing under a revocable permit program, because the public owns the fish, and they are astute enough to realize that they may need to use a portion someday for needs besides commercial killing.

Many of the proposals brought to the table are drafted with a guiding philosophy of limitation of public access, and public access, if allowed to increase, must carry compensation for the commercial fisherman. This is plain wrong. The proposals are designed to limit public access, by way of artificially limiting that which is available for the public to harvest, and/or artificially driving the cost of access to a prohibitive level.

It appears that any increase in public access must be bought by the public from the commercial sector which drives up the cost of access. All of this only benefits the commercial fisheries.

Carrying the process to its logical conclusion finds that recreation fishing via the charter service program becoming too expensive eliminating all except the very wealthy. This action will eventually leave under harvested fish which will be returned to the commercial sector to kill.

I wonder what's next in the great scheme: maybe such wrongful proposals by the commercial sector after they successfully decimate the charter industry would be to reduce recreational fishing not controlled by charter regulation. This will undoubtedly come in various forms such as reducing daily bag limits, setting annual catch limits, limiting the fishing season, all of which are designed to separate the public from its resource except at the fish market. Any and all of these potential limitations would severely impact those who participate in recreational fishing. Does anyone care about the profound economic impacts on the communities that enjoy a tourist business resulting from recreational fishing?

The only elements that I have seen brought to the table deal with limiting access to recreational fishing. A complete economic assessment is imperative to provide the missing information that must be in hand to determine the highest and best use of the fisheries resource on behalf of its owner, the American people.

I suggest that in this age of computers and information management, that the Fisheries Council retain the services of a computer modeling firm that can build the appropriate model of this industry so all possible alternatives can be effectively analyzed so we "know" what "highest & best use" looks like, and what the long term impacts of your decisions will be.

Sincerely,



Robert Howard
Homer, Alaska

SITKA CHARTERS

Your Alaskan Vacation Charter Specialist

North Pacific Fisheries Management Council
605 W. 4th Ave, Suite 306
Anchorage, AK 99501

November 29, 2006

Dear NPFMC Members:

My name is **Angela Filler**, I own Sitka Charter Brokers in Sitka Alaska. I utilize over 50 single boat charter operators in my business.

I have a few points that I would like to be considered for the December 4th – 8th, 2006 NPFMC meeting to be held in Anchorage this year.

- HALIBUT COALITION** has stated that area 2C went OVER the GHL by 47%. I find this highly suspicious and question their resource. I would call for immediate proof of this figure. If necessary, we will gladly turn in our log book copies that were reported to the ADF&G and compare actual figures. I can guarantee the figures will not match.

We had an exceptionally low Halibut catch rate this year as opposed to the last 10 years. This was by far the worst average Halibut catch for our personal Charter boat, as well as EVERY other Charter Boat Operator utilized in my business. Why, at the end of the year, were all the charter boat operators scratching their heads saying this was the WORST year ever for catch rate of Halibut, only to read a report so SOON after charter season ended with numbers saying we were almost HALF over the GHL? This just doesn't make sense.

- MORITORJUM / CHARTER HALIBUT IFQ**

I support a moratorium. I also feel that large charter operations should be limited to a maximum 3 or 4 boat operation. If the charter halibut IFQ system comes in to play, this will be an unfair advantage that a large, multi-boat charter operation has over the single charter operator. This creates a monopoly and reduces the right for a single operation to earn a living.

I propose that if an IFQ came in to play that the large charter boat operations be made to reduce their fleet to allow more allocation to be distributed fairly, without a qualification year being a factor. This would allow a more equal distribution of charter boats without a monopoly.

I feel that the charter operators that have participated in the charter fisheries the *most*, not longer should be rewarded. Some boats have been registered charter operators for many years, but have not fished as many days. There are operators out there that only keep their charter status for one reason or another, but only log anywhere from 3 to 60 days out of a 120 available season. The qualification should be based on an operators logged days in a 5 year average.

Angela Filler
PO Box 556 ~ 102 Katlian St, Suite 101
Sitka, AK 99835
Local 1-907-747-0616 ~ Toll Free 1-888-409-0616
Fax: 907-747-5501
Email: angela@sitkacharters.com
Website: www.sitkacharters.com

RECEIVED

NOV 29 2006

N.P.F.M.C.

SITKA CHARTERS continued ... page 2 of 2

We have seen what Crab Rationalization has done to the Crab Fisheries, or at least I have, as my husband has been in the Crab Fisheries since 1988. I can say first hand, that as a family with 2 small children, this has devastated our family unit. Now, as a single charter operator, we're facing the same devastation if your council decides to implement a charter halibut IFQ system as it is proposed in its current state.

SEPARATE ACCOUNTABILITY is simply unfair.

I have read carefully, the ACA's True Accountability proposal. I agree with this proposal. I think the BY CATCH from the Commercial Sector should NOT be ignored. I feel my opinion should be at least considered, as I am a COMMERCIAL Fisherman's wife. I see both sides and feel, even when I'm out long lining our 17,500 IFQ pounds of Halibut, that I am ashamed to be affiliated with other Long liners, in that they are hateful, selfish and have had it their way for too long. They do not do well with change, even when change is bettering our local economy.

When I see the Long Liner's proposal and compare to the Charter Sector's proposal, I see animosity, revenge, greed and hatred in the Halibut Coalition's proposal. When I put my Charter Hat on, and read the Charter Sector's proposal, I see nothing but FAIRNESS. In the end, we will all sleep better at night if the "fair" approach is adopted by this council.

BAG LIMITS

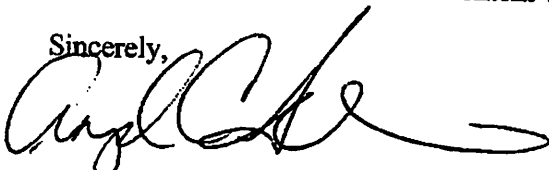
I am an individual that would definitely SUPPORT a 5 annual bag limit per licensed angler. My motto is, "Do not let your GREED, excess your NEED". We can educate our clientele of the reason for a 5 Halibut Annual Bag Limit. They will still come to Alaska and fish. I doubt, however, they'll still open their wallets for a 1 annual Halibut and a 3 annual King Salmon fishing trip.

FISH LICENSE PROPOSAL

This is of no subject on your agenda, however, I feel the ADF&G should require ALL anglers to have a valid Fishing License. This would increase their revenue by the purchase of all the fisherman under 16 years of age, as well as the other benefit of tracking those YOUTH anglers' Halibut catches.

In closing, I regret I will not be able to attend this year's meeting in Anchorage to give my 3 minute testimony in front of you. After the Crab Rationalization, we cannot afford the expense to fly to Anchorage. I do hope you remember this letter and it's content when making your final decisions.

Sincerely,



Angela C Filler, Sitka, Alaska

Capt.
Alaskan Experience
Pete's

www.captpete.com

November 29, 2006

Ms. Stephanie Madsen, Chair
North Pacific Fisheries Management Council
605 West Fourth Street, Suite 306
Anchorage, Alaska 99501-2252

RECEIVED

NOV 29 2006

N.P.F.M.C.

Re: December Meeting Agenda Item C-1: Charter Halibut Management

Dear Ms. Madsen and Council Members:

As an owner/operator of a charter company in Homer that tries to operate even during the winter months, I am unsure of whether I can make it up to Anchorage to testify in person. I appreciate the opportunity to fax my comments in advance. As I have mentioned before, I urge you to consider holding town hall style meetings in the major ports where the fishermen you manage live.

As you review the work that the Stakeholder's Committee has submitted, I would like to comment on some of the points contained in the minutes from their last meeting. I agree with the committee's call for the moratorium to move forward. The State of Alaska has a limited entry program that seems to operate smoothly and I see no reason why the charter sector could not operate under the same system.

The State of Alaska Department of Fish and Game has preliminary data that shows both areas 2-C and 3-A over the GHL. I have some reservations about these numbers, but nevertheless, as I have pointed out before, this only shows the need to increase the allocation to the recreational sector. The present GHL should not be considered a permanent allocation.

There is resistance to combine the guided and unguided anglers into one sector, but this needs to be done to circumvent the proliferation of the non-guided lodges. A recreational angler is still just that no matter whether he is on his own boat or fishing on mine. I think this is especially true when you consider lowering the bag limit to one fish.

Once the GHL is ratcheted upward to a fair allocation, there can be increases to the recreational allocation by instituting a halibut stamp/permit and funding a share buy-back and banking the shares. Once this allocation is adjusted upward and a compensated buy-back scheme in place, I would support Rex Murphy's "True Accountability" Plan.

By working to reduce the trawl by-catch of halibut, you could solve this allocation issue by redirecting the fish they waste and converting them into high value opportunities for the charter and longline industries that sustain our coastal communities in Alaska.

Thanks you for your time and hard work.

Sincerely,


Pete Wedin

ORION CHARTERS

Dave & Frieda Wiley
 ORION CHARTERS
 P.O. Box 3577
 Valdez, Alaska 99686

(907) 835-8610
dave@orioncharters.com
www.orioncharters.com

RECEIVED
 NOV 29 2006

N.P.F.M.C.

November 29, 2006

Ms. Stephanie Madsen
 NPFMC
 605 West 4th Ave., Ste. 306
 Anchorage, Alaska 99501

Sport fishing for Halibut is an important part of Alaska's economy. Many local Alaskans as well as "tourists" choose to participate. This in turn brings millions of dollars to a broad range of Alaskan businesses. Airlines, hotels, restraints, fuel companies, sporting supplies, marine dealerships, and charter businesses, to name a few. Currently there are approximately 1200 licensed halibut charter businesses in Alaska.

Without going into lots of additional detail, one could estimate that a sport caught halibut brings the Alaskan economy from 100 to 1000 times the money that the same halibut would bring Alaska if it were commercially caught.

If the daily halibut bag limit is decreased from two fish per day to one fish per day, severe economic impact will occur not just on the halibut charter business but on a multitude of Alaska businesses. Please carefully consider the implication of this proposal before cutting the halibut daily bag limit.

This does not seem to be an issue of common sense. It appears to be entirely about greed by the commercial sector. Since 1995 when commercial fishermen were "given" their IFQ's, according to the IPHC yearly reports, commercial fishing for halibut has increased from 44 million pounds in 1995 to 75 million pounds in 2005, or an increase of 31 million pounds per year. For the same time period sport fishing has accounted for from 7 to 9 million pounds per year, or an increase of 2 million pounds. If this is not about commercial fishing greed then why is commercial fisherman worried about a slight increase by the sport fishing public when they have increased their catch so significantly?

A solution to these crises is to implement a Moratorium/Limited Entry Program for the charter fleet.

Also granting the State of Alaska (ADF&G) a limited delegation of authority for management of the guided sport fishery would be a good choice.

Sincerely,

Dave & Frieda Wiley
 Owner Operators/Orion Charters
 (907) 835-8610

Dave Wiley 11-29-06

Frieda Wiley 11-29-06

RECEIVED
NOV 29 2006

North Council-

I am 23 years old, and am about to begin my fifth year of owning and operating DeepStrike Sportfishing in Homer, Alaska. My concerns are as follow: **N.P.F.M.C.**

-Since the GHL came into effect, commercial allocation has been raised over 50% while charter allocation remained fixed.

-Yearly, commercial trawlers waste in bycatch nearly 3 times the halibut poundage that sportfisherman catch and utilize. It is my understanding that a vast number of these halibut are in the one to five pound range, meaning that the number of fished killed per pound is much higher in commercial bycatch than in sportfishing catch. How can the sector which brings the most money per pound to the state be the one facing cutbacks while other consumers of the resource have their allocation raised, and waste millions of pounds each year?

-Longliners are currently not required to record daily their release rate. Release percentage estimates are extrapolated from data recorded by observers on test vessels. Any statistician would be concerned that those fishing with observers on board would be less likely to:

- a. Fish in areas closer to port which harbor smaller fish.
- b. Throw back fish which are above the legal length limit, but which are not large enough to bring premium price at market.

- Current statistical areas are too large to reflect the encroachment of longliners on areas accessible by sportfishermen. Areas in Cook Inlet for example stretch from the commonly fished areas 30 miles from Homer all the way to 70 miles out at Augustine Island. There is no way for biologists to know whether those who traditionally fished at Augustine are now fishing only 30 miles from port, and thus competing with sportfisherman at a greater rate.

- Those who have the lowest impact on the resource are facing the greatest sanctions. Charters boats act as a platform from which sportfishmen can access a public resource. Limiting the charter fleet will result in a

reduction of free enterprise, possibly resulting in a closed market "Rich Man's fishery." As long as trawl bycatch continues at its present rate, it is asinine to sanction an industry which is the most efficient and humane user of the resource.

Please do not attempt to influence a citizen's right to catch two halibut per day while millions of pounds of immature halibut are caught, crushed, and thrown overboard yearly.

Thank you for your time,

David Bayes
DeepStrike Sportfishing
Anchor Point, AK 99556
(907) 235-6094

November 28, 2006

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED
NOV 29 2006
N.P.F.M.C.

Subject: Moratorium Considerations on Sport Fishing

This is a letter of request that the North Pacific Fishery Management Council not implement a moratorium on halibut sport charter fishing. I respectfully request that there be no reductions in the limit of halibut caught by sport fishing via charter boats. I would hope that the North Pacific Fishery Management Council could readily approve this request by simple adherence to "public trust doctrine" whereby every effort is made to assure access and use by the public at large.

It is my understanding that the proposed reduction in halibut fishing limits will result in an increase in commercial fishing permits. These permits for commercial and charter fishing of halibut should continue to be allocated at their present respective percentages. An increase in commercial halibut fishing allocations should not be allowed if it decreases the percentage of allocations of the charter fishing of halibut. Both fishing allocations should be subject to revocation and re-issuance at levels consistent with halibut availability.

Please know that I will certainly endorse any conservation program of the valuable halibut fisheries resource as long as the fishing allocations remain equitable between commercial and charter boats. However, I have not seen data that would support the argument that the halibut fishery is in danger of being overfished by the general public. It is my understanding from my research on the subject that sport fishing activities remove less than 15% of the available fish, while the balance is taken by commercial. This is an existing and significant imbalance in allocation that should not be further promulgated by a moratorium on halibut sport fishing.

Other wildlife management models where the commercial industries have had more than their fair share, have ended in disaster as the commercial fishing industry has annihilated various species of fish. Please consider the track record of the commercial fishing industry versus the sport fishing industry that has had a healthy effect on our resources and economies.

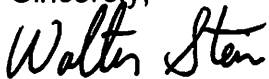
When necessary, redistributions of allocations of this public resource should be done in a "fair and equitable" manner. I wish to request that the right to access and harvest these resources should be to the American people first, rather than for commercial interests. Without the services of charter boats, I and my family

have no economically means of accessing these resources. Additionally, as a sport fisherman who utilizes that charter fishing boating services, I contribute to Alaskan's economy significantly through my secondary spending for flights, food and lodging while on a sports fishing trip.

In conclusion, there is no substantiation that I am aware that indicates the halibut fishery is in danger. It appears that the current proposed moratorium is being introduced to terminate the sport fishing enthusiast ability to gain access to the public resource. The take of halibut by sport fishing verses commercial interests is improperly allocated in favor of commercial interests and is inconsistent with the American public's right to enjoy this fisheries resource. Please do not stop me and my family as well as other Americans from enjoying access to our halibut. The people's access and mass of halibut should be increasing, not decreasing. Please do not implement this proposed moratorium.

Please feel free to contact me for any questions.

Sincerely,



Walter Stein
7660 Santa Theresa Drive
Gilroy, CA 95020

Cell: (310) 463-5701

Prince William Sound Charterboat Association

Formally the
Valdez-Whittier Charterboat Association
P.O. Box 90, Ester, Alaska 99725
907-479-5562

November 30, 2006

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

RECEIVED
NOV 29 2006

N.P.F.M.C.

Sent by Fax 907-271-2817

RE: Halibut Charter Issues

Dear Stephanie Madsen, Chair; and Council Members,

The membership of PWSCA urges you to take the following actions at your NPFMC meeting in Anchorage the week of 4 December 2006:

- 1) Move forward ASAP and expedite the Moratorium/Limited Entry program as recommended by the Halibut Charter Stakeholder Committee.
- 2) The control date of 12/09/2005 must be maintained, along with the criteria established for participation.
- 3) Set a threshold for charter operator's participation in the Moratorium program at a minimum of 10 ADF&G Logbook verified Halibut fishing trip days/season. Latent capacity must be addressed
- 4) Move forward with granting the State of Alaska (ADF&G) a limited delegation of authority for management of the Guided Sportfishery.
- 5) Move forward with all possible speed with analyses for a permanent solution of Angler Days or a Charter IFQ that the Halibut Charter Stakeholder Committee has recommended.

Please move forward now on these actions! It is way past time to act. I will remind you that the Council's failure to do a moratorium (1997 GHF final action meeting) as requested by charter operators has brought us to this juncture.

We strongly urge the Council not take any actions on consideration of a 1 fish bag limit. A bag limit change would truly wipe out the charter fleet in Prince William Sound. We feel that you should use traditional tools as first and foremost: 1 trip each 24 hour period, then next annual limits, seasonal limits and crew fish limits. Doing restrictions in this order levels the playing field amongst charters rather than the detriment to Prince William Sound charters who represent the gateway to this halibut resource for the interior of Alaska. The next port for these Alaskans is 200 miles further down the road.

Sincerely,


John Goodhand, President of PWSCA

Date: November 29, 2006

To: Northern Pacific Fisheries

From: Barbara Howard, Homer, Alaska
Mother, Wife, Public Servant (elected hospital board member)

Subject: Charter Moratorium Deliberations

RECEIVED
NOV 29 2006

N.P.F.M.C.

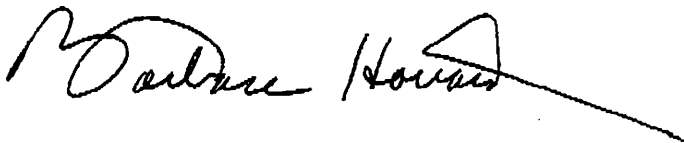
Good Day,
My name is Barbara Howard, a resident of Homer, Alaska.

What a task you dedicated and very empowered folks have before you. Your decisions affect so many lives that it is a wonder any of you would sign up for this duty. I am here to thank you for stepping up to the plate .

You have heard hundreds of speakers for against in between and from their point of view, they speak honestly and without hidden agenda. But remember in this world, "it is all about me". There are so many sides to any story. As a mom of six I learned one thing, there are three sides to the story yours, mine and the truth. I ask you to set your sights on the truth. Revisit the words of the law, revisit the intent of the authors of all the laws that govern us, and in your wisdom, fine the fair and equitable path. You will not make everyone happy, but your spirit and actions can make everyone understand the ethics of your decisions. That you can look yourself in the mirror and look at Mrs. Smith in the grocery store and, with confidence based on your authority and the laws directing your actions, say I think we have a fair plan, one that is sustainable should be your goal.

Frankly I don't understand a lot of what is being hashed over during this meeting, but I do understand that fishing is very important to my coastal fishing town and as a business owner, full time resident, a lady with a lot of friends that come up to "go fishing" and a person who believes in the rights of the people of this great country. What I am hearing seems contrary to a public debate being held in America where the majority rule. Where one voice can and often does make a difference. Government is of, by and for the people. Be sure that you are enforcing and interpreting the law, not rewriting the law.

My hope would be that some one will say something that would cause all of you to stop and think: are we on the right tract, are we doing the right thing, or do we need to revisit, re think all of this. Be sure that you are sitting in your chair ready to do business unencumbered and with out prejudice.



Date: November 29, 2006
To: Northern Pacific Fisheries
From: Anna Lynn Heinkel, Esq.
Attorney and avid sport fisher
Subject: Charter Moratorium

RECEIVED
NOV 29 2006
N.P.F.M.C.

You are contemplating another regulatory step in the name of resource management by setting a moratorium on charter fishing. This step is not necessary and in fact is a step in the wrong direction making return to the basics and long term solution more difficult to achieve.

Are there alternative solutions that do not require meddling in the free enterprise of charter operations? Yes!

The law sets forth the guidance for a permanent solution. The law calls for:

- ↓ a Fisheries Management Plan.
- ↓ directs "fair and equitable" allocation
- ↓ requires permits be revocable
- ↓ does not require compensation for revoking

Any fisheries management plan must vest interest in the fishery to its owner the American public. They are entitled to a return on its resource if harvested for private gain. This could be done via a lease program. This could be structured in many ways. The primary benefactor in perpetuity would be the American public.

The obvious issue is the complexity of the "vested interest" that is construed by some from buying and selling fishing permits that has been allowed to occur. There are at least two ways to deal with this. Let's get back to the basics so we can do it right.

First: stop the speculation on permit value by eliminating permit transfers. Then revoke all permits without compensation say ten years from a date to be determined. This allows all that have spent money to recapture that capital with a reasonable return through fishing.

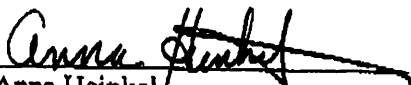
Second: which appears contrary to law, is revocation with compensation. If this is contemplated, then Congress needs to pass a law saying its OK to revoke/retire permits with compensation so it can be legally done. This entails the public buying its resource that it never sold.

The resource **must** be allocated first for public recreational use, and if the public desires, the excess capacity being leased to interested harvesters with the public benefiting from lease income.

Bottom line: the public owns the resource and it should have first right to the resource for subsistence and recreational benefit. The public has always paid all management costs through licensing programs or costs paid for fish at the market, and it will continue to do so.

I suggest that our IFQ program that we embarked on a few years ago is not working very well. It is designed to pit industry against industry, with big money always working to keep out competition for resource share so it can make more money. This is the natural outcome of this type of program. Who is the loser? The American public. We need to step back and develop the long term plan that is a living document that returns the American public to the driver's seat, embodies all elements set forth at law.

We are in our infancy in this matter. We will spend more time in the future coping with our current decisions than we have spent here in the past. We need a solution that best serves the American public in perpetuity.


Anna Heinkel

RECEIVED

1/2

NOV 29 2006

5567 Morningside Dr
Dayton, CA, 94517

925 672 7669

Nov 29, 2006

To: North Pacific Fishery Council N.P.F.M.C.
Anchorage, AK.

FAX: 907-271-2817

Subject: Consideration of Limits on Charter fishing
for Halibut

My name is Walter Howard and I am a resident of California. I spend 2-3 weeks each year vacationing in Alaska and one of the main activities while there is sport fishing for halibut using the charter boats that pursue halibut. I have been doing this since the late 80's. I have many friends who also enjoy sport halibut fishing using Alaska's sport charter fleet.

I was very disturbed to learn that there is a proposal to limit or place a moratorium on sport chartering fishing for halibut. It seems to me that the public's main access to the fish is through the system of charter boats. It does not make sense for me to tow a boat to Alaska each year for 2-3 days of halibut fishing. Without the system of charter boats, sport fishing for halibut becomes not available to myself and the American public who owns the halibut resource.

I request your consideration of not

To: North Pacific Fishery Council

2/2

limiting the public's access to sport fish for halibut by reducing or elimination of charter halibut fishing. I believe the American public owns that resource and should not be denied the charter boats for access to the fish.

Thankyou very much for your consideration

Walter Howard
5567 MORNINGSIDE DR.
CLAYTON CA 94517
925 672 7669

Adventure Alaska Coastal Cruising Goodhand Charters of Valdez

P.O. Box 90, Ester, Alaska 99725
907-479-5562

RECEIVED
NOV 29 2006
N.P.F.M.C.

November 30, 2006

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

RE: Halibut Charter Issues

Dear Stephanie Madsen, Chair; and Council Members,

It is way past time to act on the Charter Halibut issue. With the growing charter halibut harvest and the "Gold Rush" mentality created by the "new control date", the council needs to move with all possible speed on the Moratorium and the permanent solutions that the Halibut Charter Stakeholder Committee has recommended. Inaction is hurting long time charters, the public's access and commercial interests as well. A roll back of participation is needed in the form of a threshold for entry into the Moratorium. Most charters under 10 to 15 day/trips each year are not viable. Weed out this latent excess capacity now.

I will remind you that the Council's failure to do a moratorium (1997 GHF final action meeting) as requested by charter operators has brought us to this juncture. Inaction is only hurting the established businesses both charter and commercial. Please take the following actions at your NPFMC meeting in Anchorage the week of 4 December 2006:

- 1) Move forward ASAP and expedite the Moratorium/Limited Entry program as recommended by the Halibut Charter Stakeholder Committee.
- 2) The control date of 12/09/2005 must be maintained, along with the criteria established for participation.
- 3) Set a threshold for charter operator's participation in the Moratorium program at a minimum of 10 to 15 ADF&G Logbook verified Halibut fishing trip days/season. Latent capacity must be addressed
- 4) Move forward with granting the State of Alaska (ADF&G) a limited delegation of authority for management of the Guided Sportfishery.
- 5) Move forward with all possible speed with analyses for a permanent solution of Angler Days or a Charter IFQ that the Halibut Charter Stakeholder Committee has recommended.

I strongly urge the Council not take any actions on consideration of a 1 fish bag limit. A bag limit change would truly wipe out the charter fleet in Prince William Sound. We feel that you should use traditional tools as first and foremost: 1 trip each 24 hour period, then next annual limits, seasonal limits and crew fish limits. Doing restrictions in this order levels the playing field amongst charters rather than the detriment to Prince William Sound charters who represent the gateway to this halibut resource for the interior of Alaska. The next port for these Alaskans is 200 miles further down the road.

Sincerely,


John Goodhand

Sent by Fax to (907) 271-2817

SANITY CHARTERS
1074 Eliz Street
North Pole, AK 99705
(907) 488-2960
Email: larsen_ken@hotmail.com
09:30 AM, 29 Nov 2006

RECEIVED
NOV 29 2006

RE: Halibut Charter Management

N.P.F.M.C.

Ms. Stephanie Madsen, Chair
North Pacific Fisheries Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Madam Chair:

I've owned and operated a small 6-pack charter fishing business out of Valdez, Alaska since 1993. I have followed and participated in the Charter IFQ Vs GHM trials and tribulations since their inception and there is still no resolution. There have been at least 3 moratoriums placed on new Charter Entrants but the charter fleet growth continues. Halibut Charter IFQ's would have solved this problem long ago if it would have been timely implemented with the 1997 or 2001 actions.

The fixed GHM has again apparently resulted in a 42% overage in Area 2C and an 8% overage in Area 3A. This would not have been a problem if the Charter GHM was not fixed but rather allowed to flex like the commercial sector's TAC according to Halibut BioMass fluctuations. Remember, the Commercial Fleet's 69.86M lbs IFQ for 2006 was still 144.3% of their initial quota issue, so their continuing complaint about the Charter Fleet's GHM overages detracting from their TAC must be considered in that context. Now their insistence on a one fish bag limit will destroy us Prince William Sound Halibut Charter Operators due to our near shore depletion-caused extended travel distances! **I urge you to take no action on consideration of a 1 fish bag limit!**

As a result of the above, I urge you to take the following actions at your NPFMC meeting in Anchorage the week of 3 December 2006:

- 1) Move forward ASAP and expedite the Moratorium/Limited Entry (M/LE) program as recommended by the Halibut Charter Stakeholder Committee. This is the only realistic thing that can be implemented in 2007 to avoid business-destroying limits on the Charter Fleet.
- 2) Maintain the 9 Dec 2005 Control Date and Criteria for new Charter Entrants.
- 3) Use 1-trip/day limits, then annual limits, then seasonal & crew fish limits.
- 4) Set a threshold for charter operator's participation in the M/LE program at a minimum of 10 ADF&G Logbook verified Halibut fishing trip days/season
- 5) Move forward with granting the State of Alaska (ADF&G) a limited delegation of authority for management of the Guided Sportfishery.

Please move out now on these actions!

Sincerely,

Ken L. Larson

Capt. Ken L Larson
F/V 'N SANITY



Aurora Charters
Capt. Stacey Mitchell
M/V Martie Kay
P.O. Box 2142
Valdez, AK 99686
(907) 835-2140
auroracharters@valdezak.net

November 29, 2006

Ms. Stephanie Madsen, Chair
NPFMC
605 West 4th Ave., Ste. 306
Anchorage, AK 99501

Re: Halibut Charter Management

RECEIVED

NOV 29 2006

N.P.F.M.C.

Dear Ms. Madsen,

It has come to my attention that the North Council is considering asking the IPHC to implement a one fish bag limit for halibut sport fishing in area 3A. I think this would effectively destroy the guided sport halibut fishery in Prince William Sound and put a large number of people out of work. This fishery is essential to the economic health of our region. Our communities depend on the summer visitors and a very large percentage of those visitors go fishing for halibut aboard charter fishing vessels. Due to the travel distances required for reliable fishing, we need to charge a substantial fee just to cover expenses. If anglers are only allowed one fish, I believe many of them would choose not to fish at all due to the cost.

Please seriously consider the other options brought forward by the Stakeholder Committee including prioritizing the Moratorium and Limited Entry Programs as outlined, setting a threshold of ten documented halibut charter days per vessel, and ask for limited State of Alaska management of the guided sport halibut fishery.

One option I cannot personally support is eliminating captain and crew fish retention. I believe that a better option is implementing a yearly bag limit for sport caught halibut. Why should I burn all that extra fuel and cause more pollution and congestion when I can just catch those fish while I am already out there? An annual bag limit of 6 fish would eliminate the need for taking away the captain and crew's right to fish for their families while on the fishing grounds with charter clients.

Thank you in advance for bringing my concerns to the North Council.

Sincerely,


Stacey Mitchell

P.O. Box 2284
Kodiak, Alaska 99615
November 29, 2006

RECORDED
NOV 29 2006
N.P.F.M.C.

Ms Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
FAX (907) 271-2817

Dear Ms Madsen,

We are 30+ year residents of Kodiak, owners of the 53-foot Lisa Gayle, and long time participants in the commercial halibut fishery. We are very concerned that the halibut charter fleet has exceeded the GHL and is eroding the value of commercial quota share.

The Council committed to managing the halibut charter fishery to the GHL until a long-term solution is implemented. The 2C halibut charter harvest is now close to 50% over the GHL. The 3A halibut charter harvest is now approximately 10% over the GHL. The Council has failed to meet its commitment to the commercial industry.

The commercial fleet should not be penalized for charter overages. The Council and the National Marine Fisheries Service need to effectively manage the charter sector to stay within its allocation and adopt **separate accountability** for the charter and commercial fleets.

For 13 years the commercial halibut industry has asked the Council to stop the open-ended reallocation of halibut from the commercial to the charter industry. Effective action is long overdue.

Sincerely,

Phil Robbins JRM

Phil and Lisa Robbins

Dear NPFMC Members:

I was born and raised in Sitka Alaska and have been charter fishing for five years now. Last year I attended a council meeting and spoke in favor of the moratorium and against separate accountability. Being fairly young and new to the process I must say I felt a little discouraged by the process. The charter industry accounts for such a small portion of the over all halibut harvest levels I believe between 10-15%, and yet we are considered to be grossly over the GH. That means that commercial long liners are unsatisfied to only consume 85-90% of the resource. In fact commercial harvest levels have been on the rise, not the decline, but if charter didn't exist than harvest levels would have even been even higher. With commercial halibut prices so high and harvest levels increasing, and IFQ prices through the roof it doesn't take a mathematician to know that the commercial halibut industry is doing fine.

The charter industry's current goal is to continue to exist. We are not looking to increase our harvest levels, we just want to have an appealing enough package to get people to come and fish. Increases in our harvest levels will continue to happen until a moratorium is put in place. So what do we do in the mean time? Cut charter halibut levels lower and lower until it is so undesirable no one will come. Something has got to give the charter industry has been held to a GH level that is out dated and not been able to increase and regulations allow more and more people to enter the industry. It is not the individual charter operator's fault that the system is failing him, but they will be the ones who ultimately pay the price as they watch their industry continue to be diluted. Please try to consider the charter industry as important as the commercial industry in your decision-making process.

Sincerely,
Casey Gould

REC-110
NOV 29 2006
N.P.F.M.C.

November 29, 2006

Stephanie Madsen, Chair
NPFMC
605 West 4th Ave., Ste. 360
Anchorage, Ak. 99501

Ms. Madsen,

The sport fishing industry contributes more money to the communities in South Central Alaska than any other single source. To limit the halibut catch will greatly hurt the economies of these struggling towns. Believe me the costs involved in hotels, restaurants, RV parks, equipment shops to say nothing of the charter fees, license, and halibut stamp (if imposed) aren't worth it for one fish.

Yours truly,



Donald K. Robnett, Sr.
PO Box 3164
Valdez, AK 99686

RECEIVED
NOV 29 2006
N.P.F.M.C.

907-271-2817

11-29-06

North Council
To: Charter Halibut Stakeholder Committee

From: Alaska Tree Tops Fishing Lodge - Seldovia, Ak.

RECEIVED
NOV 29 2006

N.P.F.M.C.

1. PREVIOUS LOG BOOK DATA - 1998 - 2005

We have personal knowledge of more than one charter operation that has over sated their log books, in order to receive a larger percentage of quotas. Some are just waiting to see what happens and then try and sell their quotas. A charter should not be able to benefit from a ruling based on fraudulent entries. Even in the 06 log books, they listed Youth Angler #1 etc and there were no youths on their boat. In the event the Committee decides to implement a quota it should be divided equally between the Charters. That way NO ONE CHARTER receives and UNJUST ENRICHMENT.

2. IMPLEMENT A MINIMUM/MAXIMUM SIZE

We see numerous charters and sport fisherman keeping baby halibuts and I mean BABY halibuts. There should be a minimum size limit of 32". Give the babies time to grow up. Another suggestion would be to limit the maximum size of Halibut, like maybe certain days or special derby's to allow fish over 100 lbs.

3. NO CATCH FOR CAPTAIN OR CREW

I personally don't think that would have a huge effect on the totals, but we wouldn't have a problem with it.

4. BY-CATCH

Everything we have read, says that if the By-Catch could somehow be controlled there would not be a problem. Have a committee work on a solution for that.

5. EFFECTS ON TOURISM

HUGE: PAY ATTENTION TO THESE NUMBERS. THEY ARE REAL.

6. FAIR REPRESENTATION ON THE COMMITTEE

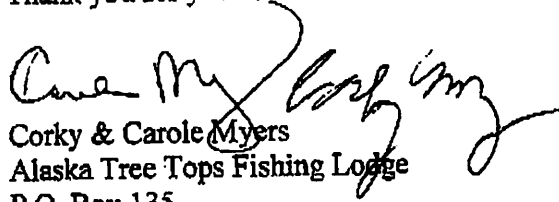
By all means.

7. SUN SET RULE ON NEW CHARTERS

In the event this is implemented - It should be based on areas and number of charters per area. Not Carte Blanc. It should also be posted some where besides the Federal Register. A lot of people don't even know what that is.

The State and the Federal Government should be consistent with the rules & regulations pertaining to the fishing industry. Data should be shared.

Thank you for your time and consideration.


Corky & Carole Myers
Alaska Tree Tops Fishing Lodge
P.O. Box 135
Seldovia, Ak. 99663
907-234-6200



UNITED FISHERMEN OF ALASKA

211 Fourth Street, Suite 110
Juneau, Alaska 99801-1172
(907) 586-2820
(907) 463-2545 Fax
E-Mail: ufa@ufa-fish.org
www.ufa-fish.org

November 29, 2006

RECEIVED
NOV 29 2006
NPFMC

Ms. Stephanie Madsen, Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501
By Fax: (907) 271-2817

RE: Charter Halibut Fisheries

Dear Ms. Madsen,

UFA is alarmed that the 2006 Charter Halibut catch exceeds the Guideline Harvest Level for area 2C and 3A but such an extent that it has put the state's total halibut catch beyond the Constant Exploitation Yield established by the International Pacific Halibut Commission. Crossing this threshold jeopardizes the sustainability of the halibut stocks, and calls for immediate action by this Council.

UFA offers the following recommendations:

- 1. United Fishermen of Alaska (UFA) requests that the council continue its support of the Halibut Charter stakeholder panel process, and ensure that staff time and skills are available to allow the stakeholder panel to proceed without delay in their work due to any lack of staff resources.**
- 2. We ask that this council direct the IPHC to impose a bag limit on the charter industry.**

United Fishermen of Alaska is the largest statewide fishing industry trade association, representing 33 Alaska commercial fishing organizations and hundreds of individual independent fishermen. UFA member groups and individual fishermen members participate in fisheries throughout the state and its offshore waters. Many of UFA's professional fishermen members and members of our groups are diversified into multiple fisheries, including halibut Individual Fishing Quota (IFQ) shares, much of which has been purchased. The halibut fishery has the largest representation for a single fishery amongst UFA's individual members.

UFA has long been a strong supporter of the Magnuson-Stevens Act, the regional fishery management councils and the NPFMC in particular. UFA's support of the NPFMC was earned by the serious attention given to science based management by this Council. In turn, this Council has helped Alaska fishermen by ensuring the sustainability of the fish we depend on by not permitting overfishing to occur.

Alaska halibut, as well as salmon and pollock, have been certified as sustainable by the Marine Stewardship Council (MSC). UFA strongly believes that the Alaska label has stood for sustainability far longer than the term has been popular, far longer than the MSC has existed, from the fisheries management changes implemented with Alaska's Constitution upon becoming a state. The label we are most concerned with is the Alaska label. Recognition of Alaska and the NPFMC's leadership in effective sustainable fisheries management has resulted in a premium market niche for Alaska's fisheries. Consumers are becoming more aware and discerning in their seafood choices, associate "Alaska" with "sustainable", and are willing to pay a premium.

A November 25, 2006 article in the Los Angeles Times noted this movement, under the headline: **"Not enough fish in the sea - As ocean seafood populations plummet, catching is mostly unhindered -- only Alaska is willing to self-police..."**

"At the first hint of a decline in salmon numbers, the Alaska Department of Fish and Game is quick to shut down coastal fishing grounds and order fishermen to pull in their nets and lines. State officials do this without protest from fishermen. Rather, they work together, to protect not just a prized fish, but an economic bonanza and a leading source of private-sector jobs in the state..."

The article noted the shift towards sustainable seafood choices by major retailers Wal-Mart, McDonald's, Darden Restaurants (Red Lobster) and the Compass Group, America's largest food-service provider to corporate and university cafeterias.

Our reputation for sustainable halibut, salmon and pollock are now the calling card for all of our fisheries, and we have a very short window of opportunity to gain market differentiation in the complete range of Alaska's fisheries before foreign producers elbow us out of our markets with farmed or irresponsibly harvested seafood, as they were able to do with salmon.

Alaska's commercial fishermen depend on responsible and sustainable management from state and federal agencies, and know the benefits of cooperating in these efforts. It is extremely distressing that this reputation and market advantage has been put in jeopardy through excessive harvest by the charter halibut fishery businesses.

According to ADF&G estimates, the amount of charter overage projected for 2006 will cause the total commercial and sport catch to exceed the Constant Exploitation Yield (CEY) established by the International Pacific Halibut Commission. Crossing this threshold jeopardizes the sustainability of the halibut stocks, and immediate action is called for.

A letter to the Council from NOAA Acting Regional Administrator Robert Mecum shows the revised 2005 sport charter halibut harvest exceeded the Council's Guideline Harvest Level (GHL) in regulatory area 3A by 1 percent and in area 2C by 36 percent. Recent estimates of 2006 halibut harvest project this overage to 8-9% in area 3A and 42-47% in area 2C.

The overage in area 2C represents up to 680,000 lbs, or approximately \$2.7 million dollars in ex-vessel value to fishermen, and the overage in Area 3A represents 300,000 lbs. or \$1.2 million dollars in ex-vessel value.

The monetary value lost to commercial harvesters is huge, but is overshadowed by the fundamental fact that the rampant and unchecked growth of the charter halibut fishery is putting the good name of Alaska fisheries management, this council, and Alaska seafood at risk. This is now a conservation

issue. Past history of the conflict between commercial, sport, and charter fisheries for halibut allocation is moot and now must take a back seat to the overriding concern that the allowable harvest set by international commission is being exceeded.

If a commercial fishery were operating unchecked and exceeding allowable harvest by even a much smaller amount, it would be promptly addressed through immediate corrective regulation, or stopped altogether until suitable management measures could be brought into play. It would be unheard of for a commercial fishery to exceed their harvest by taking fish from another sector, without compensation, and we expect this council to use every tool at their disposal to stop this now.

We appreciate the unanimous intention of the NPFMC to address this issue for the long term through formation of a stakeholder committee to work on a suitable plan, and the dedication to hold the charter halibut fishery to its GHL as expressed at the council's April 2006 meeting through the following unanimous motion:

*"The Council compliments the Stakeholder Committee on its work and encourages it to continue. As part of its plan to develop long-term solutions, the Council urges the Committee to consider a package of a modified GHL that moves with abundance, some form of separate accountability, and the provision of the proper management tools to management agencies so that each sector of the halibut fishery can be managed not to exceed its allocation. **In the meantime, the Council commits [to] using a combination of Federal and State authority to manage each sector, charter and commercial, to the allocations established by the GHL published in the Federal Register until superseded by the Council's long-term guided sport halibut sector plan.**"*

We appreciate the intention of Alaska Department of Fish and Game to curb the charter overharvest through the emergency order that prohibited crew and skipper catch in area 2C, but this did not make enough difference. We also appreciate the necessity of the charter moratorium included in the December 2005 motion, but locking in the number of operators also does not address the overharvest. You heard from numerous charter operators who opposed the IFQ a year ago, that their businesses need to book clients a full year in advance, which was a strong argument against in-season closures once the allowable catch has been reached. The only option left on the table that can still allow charter businesses to conduct charters for 2007 that are already booked, while making a meaningful correction in the overharvest, is to reduce the charter bag limit.

We are open to other ideas that will address the charter overharvest with clear and immediate effect for the 2007 season. We look forward to continued work at the stakeholder panel through our representative Kathy Hansen. We also look forward to continued positive press for Alaska's responsible and sustainable fisheries management, as a selling point for Alaska seafood.

We need your action today to make this happen.

Sincerely,



Mark Vinsel
Executive Director

North Pacific Fishery Management Council
605 W 4th Ave, Ste 306
Anchorage AK 99501
November 29, 2006
Charter Halibut Management

RECEIVED
NOV 29 2006

N.P.F.M.C.

Chairman Madsen and Council Members,

Moratorium – I am in favor of moving forward with the moratorium subject to a Sunset clause in 3 to 5 years. It is important to complete the comprehensive economic evaluation of both the recreational and commercial fisheries to appraise the highest and best use of the halibut fishery resource. There must be a fair and equitable resource allocation between sectors. The other seven Fishery Management Councils allocate between 25% to 55% of the resource to the recreational sectors (guided and unguided) as compared to NPFMC .

The North council needs to support Dr. William T. Hogarth's directive to "revitalize our recreational fisheries program" . Pres. Clinton and George Bush signed Executive Order 12961 "to increase recreational fishing opportunities." How can Alaska provide support when NPFMC is limiting the number of fishermen who access their fish by charters.

Separate Accountability

I am against Separate Accountability, but would be in favor of True Accountability – each sector being responsible for their bycatch and waste (Rex Murphy's proposal). Nothing should be done at this time regarding this agenda item- This should all be addressed under a Federal Management Plan.

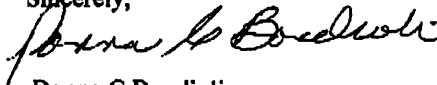
Allocation/Limited Entry Shares

I oppose any allocation scheme that gives a private sector any part of the Public Trust Resource including IFQ's or scat based plans.

GHL

At the very least, the GHL should incorporate 125% of the 2000-2004 average, then float with total allowable catch until a permanent solution is promulgated (this will address recency). As you know, the GHL is only a guideline and you are not compelled to take action when the GHL is exceeded by the Charters. While the Moratorium is moving forward, no limitations should be placed on the Charters. Restricting Charters is placing a big Stop Sign in the faces of tourists and Alaskans who want to access their own fish on a Charter boat. According to the Alaska Sportfishing Association survey in 2003, the multiplier effect of Sportfishing in Alaska was 1.05 billion dollars. Alaska cannot afford to ignore the importance the guided sector plan in the economic engine for Alaska.

Sincerely,



Donna C Bondioli
Alaska Charter Association
PO Box 66
Homer AK 99603



Alaska Outdoor Council

PO Box 73902
Fairbanks, AK 99707-3902
(907) 455-4AOC (4262)
aoc@alaska.net
www.alaskaoutdoorcouncil.org

November 29, 2006

Stephanie Madsen, Chair
179th Plenary Session
NPFMC
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RECEIVED
NOV 29 2006

RE: Charter Halibut Management

N.P.F.M.C.

Chair Stephanie Madsen,

The Alaska Outdoor Council (AOC) appreciates the opportunity to submit written comments to the North Pacific Fishery Management Council (Council) regarding allocation of sport/charter caught halibut. AOC has been representing Alaskans who hunt, trap, and fish since before statehood. Currently membership includes 50 statewide Outdoor Clubs and 3,000 individuals for a total of over 10,000 Alaskan residents. AOC advocates for conservation of natural resources and equality in access to fish and game based on the sustained yield principle enshrined in Alaska's State Constitution.

It is clear from the 2005 Charter Halibut Harvests in IPHC areas 2C and 3A that the demand for sports caught halibut in near shore waters of Alaska is far greater than the Council assumed it would have been as little as a year ago. Or the accuracy of the data gathering process is faulty to the point of being unacceptable to make allocation decisions from. Either way the points the same there is a larger demand for sport caught halibut then there is an allocation to accommodate the fisheries. A Guideline Harvest Level (GHL) or "cap" of 125% of the 1995 guided sport fishery for halibut in IPHC areas 2C and 3A does not adequately meet the current demand. Executive Order 12962 signed by President Clinton and George W. Bush called for increased recreational fishing opportunities, AOC agrees. **AOC supports an increase in the GHL for the guided sport quota in IPHC areas 2C and 3A.**

AOC supports an increase in availability and quality of Charter Harvest Data. Once accurate data is available the Council can then determine if local near shore areas are being overharvested by the guided sports fishery. Should that be the case AOC would support a GHL for the guided sport fisheries, along with a reduction in the GHL quota for the commercial fishery, to assure sustained yield management of halibut.

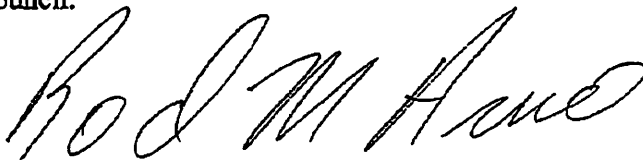
AOC comments for NPFMC-179th Plenary Session**Page 2**

AOC supports amendments to the Northern Pacific Halibut Fisheries Act of 1982. AOC Bylaw Article 3. Purpose (3) To support state management of natural resources; Alaska has the most democratic system for fisheries management in the world. The Alaska Board of Fisheries (BOF) is an open to the public regulatory body that is supported by over 80 local fish and game advisory committees who are elected from the public based on their knowledge of local fish and game resources. The BOF is bound by statute to adhere to conservation of natural resources and the sustained yield principle of fish harvest. The amendments proposed by Jay J. C. Ginter of the NMFS would allow the State to more quickly respond to recreational fishing trends such as an increase in the number of Alaskan residents who choose to hire halibut charters to harvest halibut and fluctuations in the numbers of non-residents who book halibut trips as a vacation destination. The States would better manage the sports fishery by having the authority to factor in non-guided independent angler halibut harvest whenever conservation concerns would arise from local near-shore depletion.

AOC supports sport charter representation on the Council. It's absurd that 13% of the halibut harvest quota in IPHC area 2C and 14% of the halibut harvest quota in IPHC area 3A go to guided sport charters yet they have no member on the NPFMC.

AOC supports a Long Term Solution that would allow for independent halibut anglers to harvest their wildfood in near-shore waters on a sustained yield bases. This would be consistent with the Alaska State Constitution Article VIII Natural Resources Section 3-Common Use and Section 4-Sustained Yield.

Thank you for the opportunity to submit public comment on behalf of the Alaska Outdoor Council.



Rod Arno
Alaska Outdoor Council Executive Director
Fax (907) 376-7197



Island View Resort & Charters, LLC

4405 Halibut Point Road
PO Box 6243
Sitka, AK 99835

November 29, 2006

Via Facsimile (907) 271-2817

Ms. Stephanie Madsen, Chairwoman
North Pacific Fishery Management Council
605 West Fourth Street, Suite 306
Anchorage, AK 99501-2252

RECEIVED
NOV 29 2006
N.P.F.M.C.

Dear Chairwoman Madsen:

I respectfully request that the council move to take no action on the Separate Accountability Plan with regard to halibut fishing charters. This plan does not answer a permanent solution to resource management and is destined to harm recreational anglers whose only means of accessing the public halibut resource is by a guided charter vessel.

As the GHL was set during a time of low abundance with no provisions for moving upward, while at the same time the public demand for recreational fishing opportunities in Alaska caused an increase in sport harvest, I ask that you support the Alaska Charter Association request to address recency in the charter fleet, and incorporate 125% of the 2000-2004 average to then float with total allowable catch until a permanent solution is adopted. I also support the council to move forward on a moratorium to create a temporary freeze in the charter sector for the purpose of collecting accurate data.

In accordance with Executive Order 12962, I urge the council to "increase recreational fishing opportunities." I believe that we must investigate ways of minimizing bycatch and wastage from all sectors in order to promote the best use of the resource. A realistic and fair management plan, with input from all sides, is the only method that should be considered. I support the continued work of the stakeholder committee as they design a permanent solution. I also hope the Council will ensure a high level of confidence in all data before any restrictive actions are taken.

Sincerely,

Tina McNamee
PO Box 6243
Sitka, AK 99835

Toll Free: 888-998-6544 • Ph: 907-747-6544 • Fax: 907-747-4627
Email: info@islandviewcharters.com • Website: www.islandviewcharters.com

271-2819

11-29-06 4:15 PM

Ms. Stephanie Madsen Chair NPFMC

Topic: Halibut Charter Management

A one fish bag limit will put me out of business, I charter out of Valdez and August is typically the month that Alaskans come to Valdez to get their freezer full of halibut. They won't charter at all for one fish, and Tourism has slowed down enough that I would have to pull the boat Aug 1st that only leaves June and July to make a living that's not enough time.

Please move forward in a expeditious manner and enact the moratorium/limited entry program for the 2007 season.

Lets get rid of the recreational charter boats. If you haven't fished 20 trips in a season your out. These people aren't making a living at this, their using it as a tax right off. but still catching fish that count toward the GtH.

RECEIVED

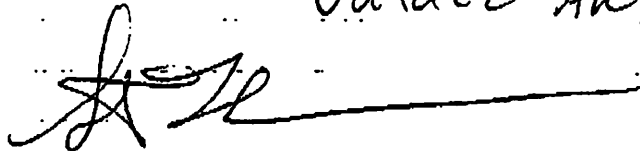
NOV 29 2006

N.P.F.M.C.

Steve Thurnear

Harvest charters

Valdez Ak



CC Charters

Cheston C Clark
PO Box 556
Sitka, AK 99835
(907) 752-0636

North Pacific Fisheries Management Council
605 W. 4th Ave., Suite 306
Anchorage, AK 99501

November 29, 2006

Dear NPFMC members:

My name is Cheston Clark, I would like to thank you for your time. I am a Bering Sea crab fisherman of 17 years going on 18, a halibut I.F.Q. owner in S. E., and a charter owner/operator in Sitka of 9 years.

I am concerned for what I will be able to qualify for when charter goes to I.F.Q., or moratorium. I am a single boat owner and have always been for the 9 years I have operated. I fear I will not receive enough fishing rights to support my Business for a full season (June, July, Aug.). I fear the multi-boat businesses are the problem in this industry, and will benefit the most. They will be able to down size on lean quota years, were I will become obsolete without a full year.

It is getting harder and harder for people of my generation to compete in the fisheries. With no funding for deckhands in the crab fisheries, which was promised, and having my charter business in a questionable state, I don't know which way to invest to make my living in Alaska. I am 38 years and cannot work as a deck hand for much longer. My opportunities are dwindling.

Please help the little guy. They are what make Alaska work.

I am also for *True Accountability*.

Sincerely,



Cheston Clark
Sitka, Alaska

RECEIVED

NOV 29 2006

N.P.F.M.C.

Post-It [®] Fax Note	7671	Date	# of pages ▶
To	NPFMC	From	Scott Glosser
Co./Dept.		Co.	
Phone #		Phone #	907-235-6015
Fax #	907-271-2817	Fax #	

RECEIVED
 November 29 2006
 NOV 29 2006

North Pacific Fisheries Management Council

Attn: Stephanie Madsen, Chair

N.P.F.M.C.

As a Charter Captain, recreational fisherman, taxpayer and concerned citizen,

I would like to voice my support for the recreational sector in this debate. It is my belief that recreational halibut fishing represents the "highest and best use" of the halibut resource as it brings considerably more income per pound as an essential part of the State's Tourism-based Economy than does commercial fishing. This will be shown, I believe, by the pending state-funded economic impact study. The Recreational Sector needs and dscrves a much larger Allocation. The numbers show that the commercial industry catches around 10 times as much as the recreational fleet and that the commercial bycatch alone (wasted dead fish) is larger than the entire sport catch... New regulation forcing better commercial efficiency and less bycatch is the proper avenue for much-needed increased recreational allocation.

I am opposed to the Separate Accountability Proposal suggested by the Halibut Coalition..

This does nothing but punish the recreational sector for the commercial bycatch problem. Once again, the recreational sector needs and deserves higher allocation and equal representation on the Council.

Thank You for your time and consideration on this matter of great importance nationwide,
 Scott Glosser, Box 3133, Homer, Ak 99603

North Pacific Fisheries Management Council
605 W 4th Ave, Suite 306
Anchorage, AK 99501-2252
Fax No. (907)271-2817

RECEIVED
NOV 29 2006

N.P.F.M.C.

Subject: Sport fishing Moratorium Considerations

I have lived in Alaska a majority of my life. During my entire time in Alaska I participated in some sort of utilization of the halibut resource. As a teenager and young adult I was a deckhand and skipper on commercial fishing boats while participating in the halibut fishery. Following this I operated a halibut charter fishing boat for ten years while continuing to participate in the commercial fishery. I no longer operate a halibut charter boat but do own commercial halibut IFQ's.

I would like to share my thoughts about the difference between a commercial fisherman and a charter operator. When I was commercial fishing my livelihood was directly connected to how many pounds of fish I caught. While working as a charter operator it was different. I made my living by providing people with quality trips. There were times while charter fishing that I did not catch a single fish or just a few. I still was paid for my service. There were also times where my customers made decisions to fish where they were not necessarily going to catch the biggest fish or take home the most pounds of halibut. They made this decision based on what was going to be the best trip for them. Sometimes it was dictated by weather, the ability of the fisherman, or where the whales were.

The other point to make about operating a charter boat was the fish that were caught during the trip I provided to my customer were their fish. None of this fish went home with me. I was not a fisherman, I was the guy who drove the boat, baited the hooks, and bagged the customers' fish for them to take home. For a huge majority of Alaskans this is the only way for them to participate in this fishery.

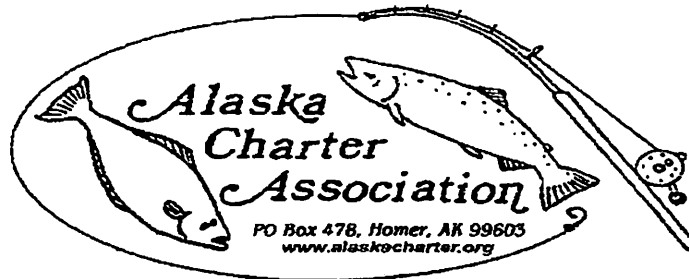
I also was raised in a small fishing town and associated with commercial fisherman. I understand the belief by most commercial fisherman that they have a right to this resource. I do not question this right but do question the current purposed allocation. To split a public resource and provide a very small portion of the population with a majority of the resource is not fair. The current belief that the halibut sport fishery should be capped at 13% does not make sense.

If this fishery is capped at 13% designated to sport fisherman (the current level) it will greatly limit the ability of the average citizen to participate in this fishery. This is not a biological matter but rather an allocation matter. As an allocation matter the council must consider what is best for the public as a whole. The purposed cap is entirely too small and not equitable. This cap would eliminate the average citizen from being able to participate in this public fishery.

Sincerely,



Robert Carlson
Anchorage, AK



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

November 29, 2006

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

RECEIVED
 NOV 29 2006
N.P.F.M.C.

Re: December 2006 NPFMC Meeting/Halibut Charter Issues

Dear Madame Chair,

We are at a very important juncture with the halibut issue. In light of the recent halibut charter catch data provided by the Alaska Department of Fish and Game, the importance of completing a comprehensive social-economic study cannot be more evident than now. This Council and all parties involved must be able to truly assess the social-economic impacts and multiplier effects before any further regulatory action is taken. Hence, this study should be balanced and conducted so that it parallels both the commercial and charter sectors. The study should be ordered now and conducted by an organization approved by NMFS to help eliminate any perceived biases.

The ACA does endorse the progress towards a moratorium that will sunset or end in three years. During this temporary freeze, more timely and accurate catch data will be accumulated, and more social-economic data will be available, too. Both sets of data can be employed to provide a much clearer picture for what is needed for the long-term solution.

We also feel it is premature to incorporate the Separate Accountability proposal. We do believe that all sectors should be held accountable not only for their catches but their resulting wastage and bycatches through True Accountability. However, neither True nor Separate Accountability should be considered by this Council until a permanent solution is reached and in place.

The ACA strongly believes that the bag limit for halibut for all recreational/sport anglers should remain the same whether they choose to fish on a charter boat or any other boat. Their access should only be limited by the abundance of the resource. Anglers on charter boats do not consider themselves anything but recreational/sport anglers and should be treated accordingly.

The ACA does recognize the importance that both sectors have to the general well-being and the economy of the State of Alaska. Both sectors involve the catching of fish, but the charter sector is more closely related to the tourism industry. The tourism industry has the potential to become ever increasingly important to Alaska. Tourism should be encouraged, not discouraged.

Sincerely yours,


 Greg Sutter
 President

Sitka Point Lodge & Fishing Charters

November 29, 2006

Ms. Stephanie Madsen, Chairwoman
North Pacific Fisher Management Council
605 West Fourth Street, Suite 306
Anchorage, AK 99501-2252

RECEIVED
NOV 29 2006
N.P.F.M.C.

Dear Chairwoman Madsen:

Thank you for the opportunity to comment on the halibut politics on your agenda. Our business supports the recreational angler interested in a fabulous Alaskan experience. As a business owner and conscious user of the resource, we have a few requests as you review the matters before you.

- Reconsider the 5 fish bag limit. This is allocation based and not a measure based on the biomass. Address the issue of reallocation to allow continuing the two fish daily limit.
- Address recency to allow for a fair and equitable allocation by updating the GHL.
- Have a clear understanding of the data before you. We have not yet heard a clear explanation of how ADF&G have gathered their numbers this year in comparison to the previous years. Before any worthwhile discussions and subsequent decisions can be made, all parties must have data that they understand and have confidence in.
- Allow for a thoughtful, reasonable, long term plan. In a business that books clients up to 2 years in advance, it is important that any measures taken are not done in an "emergency" mode. It will be hard to recover from any decisions made in this manner. The Stakeholder Committee is working hard to make recommendations that take all factors in account.
- Separate Accountability is one of those so called "emergency" solutions. Please consider proposals such as True Accountability that was generated by charter operators. I believe the solution must come from the charter sector with respect to, but not driven by the commercial sector. In the end, the solution will be one that fits our industry in the most reasonable manner.

Sincerely,
Mike and Stacy Boles
Owners



LICENSED
INSURED

Mark A. Wartes,
Captain

Ivory Gull Charters

Prince William Sound Sightseeing & Fishing Charters

1713 Central Avenue

Fairbanks, Alaska 99709

(907) 456-2551

Fax: (907) 451-8927

<http://www.ptialaska.net/~wartes>

wartes@ptialaska.net

REC'D
NOV 29 2006
N.P.F.M.C.

Ms. Stephanie Madsen, Chair
NPFMC
650 W. 4th Ave. Ste 306
Anchorage, AK. 99501

Halibut Charter Management:

It is hard to believe that we still are fighting over a resource that was not placed on earth for one user or consumer. In fact the constitution of the State of Alaska states that fact. If only half the money spent fighting over a resource, that we don't really have title to or ownership of, was spent on enhancing the fishery, we wouldn't have anything to argue about.

I am a charter boat operator and I have held a commercial fishing license in the past, and none of that makes me an expert on the distribution of the halibut resource. What I do know is that one fisheries or another does not have the right to force their agenda on the sport fishing public in Alaska. The sport fishermen of Alaska, Canada, and the USA should be the number one consideration when considering how a fishery is utilized. How the fisherman targets the fishing resource should not be regulated by how many pounds of fish the commercial sector wants to be set aside for their exclusive use.

This is like "the dog chasing its tail." When will it stop? I'll tell you, they way we are going about it, it will be when there is no more fish to fight over. Why should we learn anything from the Atlantic or Pacific fisheries? One thing for certain, there is not even one case of a salt water fishery disappearing, that the sport fishing public, has been implicated in the over fishing or the mismanagement of the fisheries.

Mark A. Wartes

RECEIVED

NOV 29 2006

N.P.F.M.C.

Ms. Stephanie Madsen, Chair
NPFMC
605 West 4th Ave, Ste 306
Anchorage Ak, 99501

Re: Halibut Charter Management

Attn: Stephanie

It is of great concern that I am hearing about the possibility of cutting the sport charter halibut limit to ONE fish per day!!

This action will most likely destroy the Prince William Sound halibut charter fleet. This fishery is not an inexpensive charter trip, and to cut the limit in half would most likely have people thinking that the time, effort, and cost of a charter trip for a 1 fish limit is not worth the expense and effort.

The better action would be to move forward with a limited entry charter boat program that would limit the number of charter boats and keep the limit at the 2 fish level. This would keep the boats and crews that truly serve the area in business and may somewhat hold down the total catch to a sustainable level. This may also require that a threshold for participation of 10 ADF&G logbook halibut days as a minimum. Let the people that truly fish the area and have a real stake in the business continue to stay alive with their charter boats and local crews.

Please move forward with the limited State of Alaska delegation of management for guided halibut fishing. Keep control of the resources in the hands of those that live and work near the resource...please!!

Thank you,
Bill Waibel

Ellamar, Ak. land owner, frequent visitor, avid fisherman and hunter!!!

C-1

December 3, 2006

North Pacific Fisheries Management Council
Stephanie Madsen, Chair
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

Re: Halibut Charter Moratorium

Dear Council Members:

On behalf of the Ouzinkie Native Corporation and the community of Ouzinkie I strongly urge the Council to provide moratorium licenses for the Ouzinkie Community Quota Entity as well as CQE's for other smaller Gulf of Alaska Communities. Anything less than 10 moratorium licenses will be an insult to our community.

I don't believe there is a single person in Ouzinkie that understands why the Council would limit halibut sport fishing licenses for our area. We have just one person that is currently operating a charter business out of our community and there is plenty of room for more charter boats. The moratorium will significantly limit residents in our community the ability to get into chartering. Once again the Council seems ready to exclude rural residents from another fishery resource. This will exclude some of our younger generation who have fished with their families all their lives as well as other deckhands from getting into the fisheries business on their own.

I know and understand the Council's concern about the charter fleet (that is the road system and cruise ship fleet) exceeding their guideline harvest level. The moratorium is not a solution to this problem. The Council should solve the GHL problem by limiting the pounds of fish sportsfisherman can retain. Here in Ouzinkie we try to keep only what we can eat and generally let the little fish as well as the big fish go. The Council should consider sport fish size limits that require big fish to be released and total pounds catch limits that prohibit sport fisherman from retaining more than 100 - 150# of halibut (50 - 100# after processing) annually.

I've attended two community conferences in Anchorage and heard numerous studies and several speakers all address the negative impacts rationalization programs, such as moratoriums, have had on small coastal communities in Alaska, the United States and around the world. Without exception, the experts and the folks that are concerned about the survival of small fishing communities have recommended that community access to fishery resources be preserved through fishery rationalization. Its time for the North Pacific Council to recognize the overwhelming evidence that communities must be protected and aggressively provide halibut charter moratorium licenses to those communities that don't have mature charter sectors in their economy. Again, I think that the minimum number of licenses for Ouzinkie should be 10.

I hear talk around the Council meetings saying that the communities should buy their moratorium licenses. Why? What have the smaller rural communities done to create the problem? The idea that small coastal communities can buy moratorium permits does not account for the economic realities of living in a remote village and trying to get a business started. While the purchase option should be retained, it won't protect access halibut chartering for rural residents. Just like Amendment 66, which was a good thing, the community can't compete in the market place to pay the price that those with other revenue sources pay for the permits (IFQ's.) Ouzinkie is still trying to figure out a way to purchase their first pound of halibut IFQ's for the Community Quota Entity.

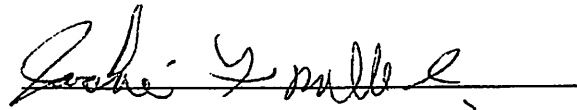
As I write this letter and think about the times I've testified before the Council, I just feel that the Council doesn't understand what we're facing here in Ouzinkie. I invite any one of you on the Council as well as any of the Council staff members to please come to Ouzinkie and to meet with our people. We're a village that is actively trying to remain viable and to keep families and jobs in Ouzinkie. Yet, we keep going backwards on fisheries and now face yet another program of exclusion. Our corporation has spent

thousands of dollars going to talk to you. I know that the Council and staff would understand these issues better if you spent a day or two in our community. When can you come?

I know you folks are trying to do a good job. I also know that there are lots of pressures when fisheries are limited. Our experience has shown that the communities get left out when it is all said and done. We can't let that happen this time. You must see that Ouzinkie gets no less than 10 halibut charter moratorium permits.

If you have any questions regarding Ouzinkie's concerns about the proposed halibut charter moratorium, please contact me.

Very Sincerely Yours,

A handwritten signature in cursive script, reading "Jackie Muller Sr.", written over a horizontal line.

Jackie Muller Sr.
Chairman, Ouzinkie Native Corporation
PO Box 89
Ouzinkie, Alaska 99644

ONC Ph No: 907-680-2208
Home Ph: 907-680-2225
Email: jackiem_sr@yahoo.com
Fax: 907-680-2329

LATE COMMENT

Introduced by:	Borough Manager
Requested by:	KIB Assembly
Drafted by:	City Manager/Mayor Selby
Introduced:	11/02/2006
Failed:	11/02/2006
Reconsidered:	11/02/2006
Postponed:	11/09/2006
Amended:	11/09/2006
Adopted:	11/09/2006

KODIAK ISLAND BOROUGH RESOLUTION NO. FY2007-12

A RESOLUTION OF THE KODIAK ISLAND BOROUGH ASSEMBLY PROVIDING FUTHER COMMENTS TO THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL ON GULF OF ALASKA RATIONALIZATION

WHEREAS, the harvesting and processing sectors of the Kodiak fishing community are substantially engaged in and substantially dependent upon Gulf of Alaska groundfish fisheries; and

WHEREAS, Kodiak's economic and social health is intimately dependent upon the community's sustained participation in all aspects of the Gulf groundfish fisheries; and

WHEREAS, the Kodiak Island Borough has made substantial investments in support of and in reliance upon the Gulf groundfish fishery, such as water system improvement and expansion and port and harbor improvements and expansion; and

WHEREAS, the North Pacific Fishery Management Council has developed a suite of fishery allocation alternatives for the Gulf of Alaska groundfish fisheries, and is working toward adoption of a preferred alternative for implementation; and

WHEREAS, allocating exclusive harvesting and/or processing privileges promotes consolidation in the fishing fleet and the processor sector, which can improve efficiency, but which can also result in skippers, crew members and processing workers bearing costs of consolidation without fully sharing in the related benefits; and

WHEREAS, while fishery rationalization may create opportunities and incentives to produce more and higher value products, it also changes the distribution of fishery revenues among participants with resulting disruptive effects on the communities in which they live; and

WHEREAS, by awarding harvesting and/or processing privileges, fishery allocations make possible orderly harvesting and processing, but it also facilitates the migration of landings to communities with infrastructure advantages (such as road system access) and creates barriers to entry for later generations of fishery participants; and

WHEREAS, as a result, it is essential that the potential adverse affects of Gulf groundfish rationalization be identified and analyzed and that adjustments be made to mitigate the potential adverse effects of Gulf groundfish rationalization on Kodiak prior to any program implementation;

WHEREAS, it is the Kodiak Island Borough's intent that a full, and frank exchange of information and opinions concerning Gulf groundfish rationalization take place among the constituencies of the Borough that would be most directly affected by such program, if adopted; and to the extent possible, to encourage the development of consensus among these constituencies concerning the preferred elements and options of such program; and

WHEREAS, the City of Kodiak and the Kodiak Island Borough joined together to appoint a Gulf of Alaska Groundfish Rationalization Task Force to provide a forum for the full, and frank exchange of information and opinions concerning Gulf groundfish rationalization and an opportunity for the development of consensus on preferred elements and options of a Gulf groundfish rationalization program, should it move forward; and

WHEREAS, while the Task Force is continuing to work, they have recently provided the Borough Assembly with a number of recommendations that the Borough Assembly is actively endorsing;

NOW, THEREFORE, BE IT RESOLVED, BY THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH THAT the North Pacific Fishery Management Council (NPFMC) suspend action on Gulf of Alaska groundfish rationalization until, at least, such time as the NPFMC has conducted its 18 month review of the Bering Sea crab rationalization program and the public has had an opportunity to evaluate and comment on the impacts of crab rationalization and to evaluate the NPFMC's adjustments (if any) to the crab rationalization program;

BE IT FURTHER RESOLVED THAT THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH requests that the NPFMC take the following Gulf groundfish management actions as soon as possible, notwithstanding the NPFMC's suspension of any further action on Gulf groundfish rationalization:

1. Initiate a discussion paper on an allocation of Gulf Pacific cod to ensure that it is fair and equitable participation among gear groups and all fisherman.
2. Initiate a discussion paper on phase-out of the offshore sector in the Gulf of Alaska.
3. Initiate a discussion paper on identifying and removing latent licenses from the Gulf groundfish sectors that are subject to the License Limitation Program.

BE IT FURTHER RESOLVED THAT THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH requests that the NPFMC is hereby requested to take the following actions in connection with its development of a Gulf of Alaska groundfish rationalization program:

1. Complete the Council's review of the Bering Sea crab rationalization program to enable the public to evaluate and comment on the impacts of crab rationalization and to enable the Council to make appropriate adjustments to the Gulf rationalization program in response.
2. Thoroughly analyze each alternative being considered by the Council before eliminating any of the alternatives, to provide the public with the opportunity to compare the effects of the various alternatives on harvesters (including skippers and crew members), processors (including workers), fishing support services, and Gulf fishing communities.
3. Include limits on harvesting consolidation through vessel use caps that apply without exemption, and that are calculated to sustain skipper and crew employment opportunities and compensation.
4. Develop and bring forward for consideration an additional alternative which includes no processor shares, linkages or privileges of any kind. For alternatives already being considered, include measures to maintain a diverse, competitive processing market, by providing a substantial pool of groundfish privileges for each sector that can be harvested without penalty and are not subject to processor linkage or processor closed class delivery requirements. This should include phasing out of the off shore processing sector.


5. If processing privileges are included, limit consolidation of such privileges through processor and facility use caps.
6. Designate Federal harvesting privileges by region to reflect landing patterns similar to those occurring prior to program adoption, and require that fish harvested under such privileges be landed in their designated region.
7. Include a reasonable groundfish allocation which may be harvested and processed without holding any Federal or State dedicated access privilege, subject to restrictions that the State of Alaska may deem necessary to maintain the entry level character of such allocation.
8. Include a community fisheries quota program that provides an opportunity for small Gulf coastal communities to enhance their residents' participation in the Gulf groundfish fishery, under the conditions that the allocation to such program does not disrupt other Gulf of Alaska fishery dependent communities by displacing their fishermen, is required to be harvested by residents of the eligible communities, and requires that harvests made under such program be delivered on shore within the region of their allocation.
9. Include a community purchase program that provides Gulf coastal communities with the opportunity to maintain participation by their residents in the Gulf groundfish fishery by acquiring harvesting privileges for use by their residents, under the conditions that the Kodiak Island communities are eligible communities, and such program includes reasonable limits on the amount of harvesting privileges that any single eligible community may hold.

**ADOPTED BY THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH
THIS NINTH DAY OF NOVEMBER 2006**

KODIAK ISLAND BOROUGH


Jerome M. Selby, Borough Mayor

ATTEST:


Nova M. Javier, CMC, Borough Clerk

LATE COMMENT



Sportsman's Cove Lodge

Alaska's Friendly World-Class Sportfishing

Reservations Office

Box 8500

Ketchikan, AK 99901

Inquiries 1 800-962-7889

Business 907-247-7252

Facsimile 907-247-7255

info@alaskasbestlodge.com

Stephanie Madsen, Chair
605 W 4th Avenue, Suite 306
Anchorage, AK 99501-2252
Fax: (907) 271-2817

November 29, 2006

Madame Chair and North Council Members:

My name is Larry McQuarrie. I am the owner of Sportsman's Cove Lodge, located in Saltery Cove, on the eastern shore of Prince of Wales Island. I served on the original Charter Halibut GHL Committee, The Charter IFQ Committee, and currently serve on the Charter Halibut Stakeholder's Committee. I am also a member of the Ketchikan area Advisory Committee of the ADF&G

On Charter Halibut Issues before the Council:

1. Expedite the Moratorium/Limited Entry program as recommended by the Halibut Charter Stakeholder Committee.
2. Ensure that the control date of 12/09/2005 is maintained
3. Address latent capacity. Set a high threshold for charter operator's minimum participation to qualify in the Moratorium program.
4. Move forward with all possible speed with analyses for a permanent solution using the Angler Days criteria or the Charter IFQ that the Halibut Charter Stakeholder Committee has recommended.

On State Delegation of Authority to manage halibut:

I would support limited State Delegation in order to increase response time to issues, with the following reservations:

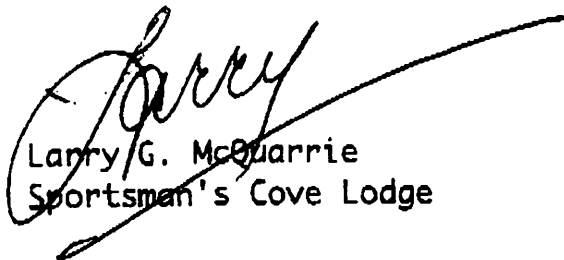
- The State has not demonstrated the willingness or the ability to work with stakeholders in the guided sport industry, though they have the structure to do so, i.e., via the ADF&G Advisory Committees and other means.

- The State often regulates by Emergency Order, which is disruptive and destabilizing.

- State actions are too often influenced by unstable political winds.

- Fast response can result in unintended consequences. Due to accounting procedures, eliminating crew fish in Area 2C did nothing to help reduce the guided catch below the GHL. Also, the non-retention EO in Area 2C left the public with the perception that halibut were in serious decline in Southeast, when in fact just the opposite is true.

Thank you for your consideration,



Larry G. McQuarrie
Sportsman's Cove Lodge

LATE COMMENT

Chair Stephanie Madsen
NPFMC
605 West 4th street
Anchorage AK 99501

December 1st, 2006

Dear Ms. Madsen,

We are 2C/3A halibut commercial fishermen with quite a bit invested in IFQ's. We are very concerned about the increasing numbers of halibut caught by the sport fishing sector in Alaska. We are disturbed to see what we perceive as inadequate response to the increasing over fishing and unregulated arena.

As commercial fishermen of halibut in Alaska, we went from derby style, dangerous 24 hour openings to the IFQ system, which provides halibut throughout the year in a safe, manageable manner to harvest. We are strictly regulated by various entities throughout the state and internationally. This system wasn't well received by some as the best way to go about catching halibut since it cut out new operators and rewarded an older generation who chose to sell their IFQ's and go on. It decreased jobs for crew, increased the money needed to fund an operation and took a while to getting used to fishing this way. We tell you this as an example of what the sport fishing fleet is going to have to face as they increase their catch limits and go beyond their harvest guidelines. It isn't always the easiest thing to do. No one wants to go into more debt to fund an already expensive operation. But the fact is, the commercial fishermen were put into an IFQ system to protect the resource and the sport fish sector has got to go through the same change immediately. This is an unacceptable way to manage this resource by letting some be strictly enforced and others just loosely managed.

The best plan that was out there was rescinded in 2001 and a decision made to manage under the GHM. It was exceeded this year by 47% in 2C and 10% of 3A. This has got to stop. The commercial fleet will pay the price for this in the end. By allowing this to happen, the charter harvest is compromising the 2C resource health by over fishing. We need you to stick to your guns on this and come up with a management plan for sport fishing. It needs to be implemented now. That solution is a one fish bag limit for charter clients. Establish some accountability so the IFQ holders don't have to pay for the charter overages. Finally, come to the realization that the charter moratorium will not work and in the long run a sport fish IFQ system needs to be put in place. We can't wait another 5 or 10 years for this to be done. It needs to be done immediately.

Good luck at the meetings in Anchorage. We hope you do the best thing for everyone involved in harvesting halibut in Alaska. Implement sport fish IFQ's and don't let the GHM be unregulated the way it was this summer.

Sincerely,

Randy and Dina Gregg
F/V Patriot
PO Box 20373
Juneau, Alaska 99802

Tommy Abbas
Devilfish charters
4011 Shady LN
Juneau AK 99801
907-523-0845

LATE COMMENT

I'm about to slip through the cracks on the proposed moratorium and IFQ programs and I suspect I'm not the only one.

I recently started a charter business (last June) and conducted 15 charters during the summer and fall of 2006. All of the proposed qualifying dates are from 1998 - 2005. It doesn't seem right that I would be forced to close up shop and sell off my boat and gear simply because I didn't participate during the "Data collection years". Wouldn't it make more sense to include all current and active charter businesses?

Just another thought about commercial usage I've noted through observing the plan evolve- It seems that all parties are assuming that commercial fisherman have some sort of priority over other users. It should be noted that they are not the only people with livelihood at stake in the fishery.

Gene Underwood Community of Ouzinkie

- Here to discuss the Community Provision^{D-1(e)} on the halibut limited entry program.
- + Ouzinkie supports the CQE holding 10 permits on behalf of community members. Permit that will remain in the village
- Ouzinkie has one person that qualifies as a halibut business right now, but there are others that hold 6 pack licenses in the village
- + Don't limit community members opportunity to get into the halibut charter business
- Don't cut us off before we can start
- + Halibut IFQ's has had a negative impact on small coastal communities, cutting the opportunity for younger generations to get into the commercial fishery. Don't do that again in the halibut sports fishery.
- We are trying to build new economies in ~~some~~ Ouzinkie.
- + Don't cut us out ~~before we start~~ of the sport halibut fishery before we can start.

COMMENTS FOR THE NPFMC RE: HALIBUT MORATORIUM

Madame Chair and Council Members: Thank you for the opportunity to speak before you.

By way of introduction, my name is Denise Hawks. I am co-owner of Puffin Fishing Charters. We have operated out of Seward since 1994 and own 5000 pounds of halibut IFQ in Area 3A.

It is imperative that the Council move forward to implement the December 9, 2005 control date on new charter boats entering the industry in an effort to help us try to stay within the GHL. Although a moratorium alone will not solve the challenges we face, it is needed by the charter industry to help us limit further growth until a more permanent solution can be developed.

The charter industry currently works as an open market system dictated by "supply" (charter capacity) and "demand" (charter clients). Despite an increase in capacity in the industry since the establishment of the GHL, there remain several days each summer when there are no seats available for either halibut or salmon fishing. Because demand (people wanting to go fishing) continues to exceed supply (fishing seats available), the capacity continues to increase each year in an effort to meet the demand.

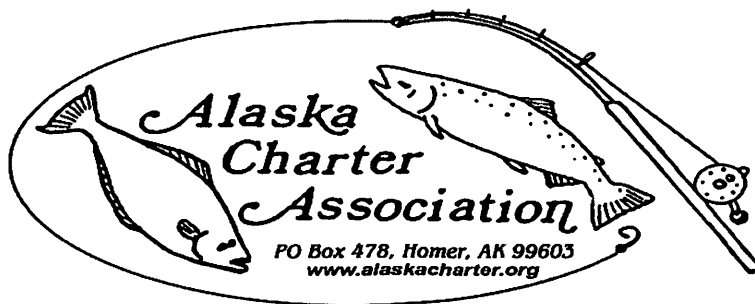
In an open market system (with an unlimited resource), there would ultimately be a balance between clients and seats, and the industry would stabilize – with a stable number of halibut being harvested. However, the charter industry did not reach that balance before it reached the GHL. Although a 25% buffer was introduced with the establishment of the GHL, which was based on charter catch data from 1995 to 1998, this proved inadequate to meet the actual growth in the public's demand on the industry. As a result, supply continued to grow to meet demand, more fish were taken, and the GHL has been exceeded.

As an industry, we have had no regulatory tools to control charter capacity and, correspondingly, the number of halibut harvested. Even the management interventions proposed by Council this morning, such as trip limits, bag limits, harvest limits, etc., which provide consequences for exceeding the GHL, won't necessarily limit the number of halibut harvested, since adding more capacity via more (or larger) charter boats can undermine a number of the strategies proposed. Ineffective interventions will result in continued GHL overages triggering progressively more restrictive management consequences.

Such restrictive consequences will ultimately result in the charter industry staying within the GHL, but it will be through a very prolonged, trying, and painful process (for both the commercial and charter sectors) as the regulatory consequences to GHL overages have to "play across the market". If the GHL is managed retroactively through regulatory consequences, instead of proactively through such tools as a moratorium, the number of halibut harvested will ultimately drop through market influences. For example, clients won't want to pay to go fishing under increasingly restrictive conditions, thereby decreasing demand, or because charter companies go out of business, thereby decreasing supply. However, the charter fishing industry could be damaged beyond recovery while these market forces play out.

I would ask that the Council implement the proposed moratorium to limit further entry into the charter industry as an initial intervention while they work to develop other, more effective solutions, to address the GHL issue. We were given a target – the GHL -- with no tools with which to hit the target. A moratorium will be one tool until the target can be adjusted (such as the GHL being increased via an appropriate strategy) or until other tools are defined by Council.

Thank you for your consideration.



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

December 06, 2006

MORATORIUM

Madame Chair and Council Members thank you for this opportunity to speak on behalf of the Alaska Charter Association. I am Greg Sutter, president of ACA, and owner/operator of Captain Greg's Charters in Homer, Alaska.

We are at a very important juncture with the halibut issue. In light of the recent halibut charter catch data provided by the Alaska Department of Fish and Game, the importance of completing a comprehensive social-economic study cannot be more evident than now. This Council and all parties involved must be able to truly assess the social-economic impacts and multiplier effects before any further restrictive action is taken. Hence, this study should be balanced and conducted so that it parallels both the commercial and charter sectors. The study should be ordered now and conducted by an organization approved by NMFS to help eliminate any perceived biases.

The ACA does endorse the progress towards a Moratorium that will sunset or end in three years. During this temporary freeze, more timely and accurate data will be accumulated, and most social-economic data will be available, too. Both sets of data can be employed to provide a much clearer picture for what is needed for the proper long-term, permanent solution.

I am Bob Howard, Homer Alaska

I am opposed to implementation of the moratorium as recommended by the Advisory Council.

The AP in its action eliminated me from the opportunity to qualify for continued guided sport fishing participation if the moratorium is implemented.

I direct your attention to Staff memorandum dated Nov 29, 2006, Subject: Charter Halibut Management Page Agenda C-1(e)(1), Alternative 2, No. 10, Option 3: Under construction as of December 9, 2005 and must have at least 1 year of ADF&G halibut/bottomfish logbook activity from 1998-2005.

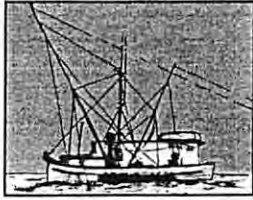
I fall into this category.

Had I known that the pending action was contemplated, I probably would have changed my business plan, spent more money and completed my construction program in time to participate in the '05 season.

I request that Council action include Option 3 as presented in the Staff memo so I can continue my guided sport fishing service that I started in 2001, resumed in 2006 and wish to continue into the future.

Thank you for your reasoned consideration.

Bob Howard, Captain
Homer Alaska



Alaska Trollers Association

130 Seward St., No. 211
Juneau, Alaska 99801
(907) 586-9400
(907) 586-4473 Fax

**Testimony of
Dale Kelley, Executive Director
on Charter Halibut Management
North Pacific Fishery Management Council
December 2006**

ATA requests the Council take action in 2007, to conserve halibut and prevent further erosion of the commercial share, by limiting guided sportfish harvest to the GHL until long term measures are put into regulation.

ATA supports a charter moratorium, but it is important that developing this system does not postpone establishing an annual harvest cap and the management tools necessary to achieve it. Moratorium is a good option for providing stability to guides and capping the number of entrants for management purposes, but it will do nothing to ease the current harvest predicament.

Since 1925, ATA has represented Alaska's hook and line salmon fleet. The troll fleet is 85% resident and about one of every 35 people in our region works on the back deck of a troll boat. Trollers hold the majority of commercial licenses in nearly all 33 Southeast ports. Trollers historically landed halibut along with salmon, but many were relatively new to longlining during the IFQ base period. Most trollers had to buy all or part of their quota share just to sustain existing operations.

ATA's primary issue focus is salmon, so we'll leave detailed negotiations to longliners and charterboat operators. However a great many of our members hold halibut and blackcod IFQ in 2C and 3A, and derive a significant portion of their annual income from these species. In fact, it's fair to say that trollers' diversification into longline fisheries has been the fleets saving grace as our markets were hit by cheap farmed imports - or the loss of significant harvest share, due to the Pacific Salmon Treaty (Treaty), Endangered Species Act, and the growth of the guided sportfishing industry.

Both halibut and SE king salmon are migratory species managed under international, quota-based systems, so issues surrounding harvest can be similar.

In 1990-91, the guided sportfishing industry surprised us all by putting Alaska well over its Treaty chinook quota. After a series of Board of Fisheries meetings, a plan to allocate chinook between sport and troll took shape, but it was ultimately trollers who repaid the bulk of the Treaty overage -- in addition to receiving a chinook allocation well below historic average. This is akin to the guided halibut GHL being set at 125% of the historic share. Still, trollers supported allowing charterboats a bit

more than average, in hopes of ending the fish fight and providing the new industry more time to adjust to regulation.

The good news is that king salmon allocation appears to have reached equilibrium, but with guided anglers breaching the halibut GHL by 47% in 2C this year, there is a need to establish fair allocations for this species. If nothing is done in '07, commercial halibut fishermen could suffer an even greater loss of harvest share. The guided anglers benefit when times were good, so must also be prepared to share the impacts of reduced quotas with the consumers who buy commercially caught fish.

The Council previously dealt with this issue, by submitting an IFQ plan for halibut charter that was stalled by NOAA. ATA supports charter IFQ and is frustrated the program was not enacted. This seems unconscionable. The federal government imposed an IFQ program on longliners and is now allowing it to be undermined, as harvest shares are eroded through a failure to act. I had a tough time explaining the outlook for 2007 to one of our members – he runs a small boat and just bought several thousand shares of halibut IFQ at \$20/pound. Surely there is something the Council could do to hasten emergency regulations, even if it bears some risk.

At the height of the chinook allocation dispute in Southeast, a lawsuit was filed over the Board of Fisheries king salmon management plan (*Tongass Sportfishing Association v. State*). The court reviewed the entire record and found the BOF had taken a hard look at the relevant issues surrounding sport and commercial allocation. The court determined the Board acted appropriately, based on the information it used when exercising its discretion to secure sustained yield. With the growth of the guided sportfish catch – and the annual unknowns of stock abundance and participation – the BOF established, by regulation, an allocation and menu of options to maintain the health of the resource and bring stability to competing harvest sectors. While there are some jurisdictional differences, the broad themes are applicable to the Council halibut situation.

The Council has dealt with this issue for over 13 years. You analyzed, developed, and sent a charter IFQ plan to Commerce, where it languished through no fault of your own. You implemented a GHL approach, which obviously isn't working to control harvest. In '07 there will be far less halibut available – a fast growing guided angler catch trend – the potential for more charter operations – and commercial fishermen with outstanding IFQ loans losing harvest share. IPHC has stated its intent to manage for conservation and both IPHC and ADFG are offering to assist with implementation of a short term rule.

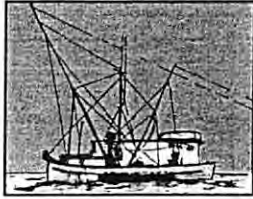
Our hope is that the Council will take action in 2007, alone or with the other agencies. Is there a risk? Perhaps. But corrective measures are warranted. The situation requires leadership and immediate action to head off future conservation problems, which would only exacerbate allocation. Based on past court decisions, it seems plausible that the Council could write a convincing record of decision explaining that any emergency action will be short term, is well-thought-out, based on years of data and harvester testimony, and intended to protect the resource, vulnerable economies, and US citizen's access – angler and consumer alike.

Simply focusing on a moratorium to respond to the current dilemma does not afford the same reasoned explanation.

ATA is committed to finding solutions that work for all user groups. Our members seek stability and success for all fisheries. Establishing a guided sport allocation, with an enforceable set of rules, benefits those who rely on halibut for a job, a special meal, or recreation. We ask all agencies to work with longline and charterboat representatives, at this meeting, to develop short and long range management actions in the 2007 season and beyond.

Respectfully Submitted,

Dale Kelley



Alaska Trollers Association

130 Seward St., No. 211
Juneau, Alaska 99801
(907) 586-9400
(907) 586-4473 Fax

**Testimony of
Dale Kelley, Executive Director
on Charter Halibut Management
North Pacific Fishery Management Council
December 2006**

ATA requests the Council take action in 2007, to conserve halibut and prevent further erosion of the commercial share, by limiting guided sportfish harvest to the GHL until long term measures are put into regulation.

ATA supports a charter moratorium, but it is important that developing this system does not postpone establishing an annual harvest cap and the management tools necessary to achieve it. Moratorium is a good option for providing stability to guides and capping the number of entrants for management purposes, but it will do nothing to ease the current harvest predicament.

Since 1925, ATA has represented Alaska's hook and line salmon fleet. The troll fleet is 85% resident and about one of every 35 people in our region works on the back deck of a troll boat. Trollers hold the majority of commercial licenses in nearly all 33 Southeast ports. Trollers historically landed halibut along with salmon, but many were relatively new to longlining during the IFQ base period. Most trollers had to buy all or part of their quota share just to sustain existing operations.

ATA's primary issue focus is salmon, so we'll leave detailed negotiations to longliners and charterboat operators. However a great many of our members hold halibut and blackcod IFQ in 2C and 3A, and derive a significant portion of their annual income from these species. In fact, it's fair to say that trollers' diversification into longline fisheries has been the fleets saving grace as our markets were hit by cheap farmed imports - or the loss of significant harvest share, due to the Pacific Salmon Treaty (Treaty), Endangered Species Act, and the growth of the guided sportfishing industry.

Both halibut and SE king salmon are migratory species managed under international, quota-based systems, so issues surrounding harvest can be similar.

In 1990-91, the guided sportfishing industry surprised us all by putting Alaska well over its Treaty chinook quota. After a series of Board of Fisheries meetings, a plan to allocate chinook between sport and troll took shape, but it was ultimately trollers who repaid the bulk of the Treaty overage -- in addition to receiving a chinook allocation well below historic average. This is akin to the guided halibut GHL being set at 125% of the historic share. Still, trollers supported allowing charterboats a bit

more than average, in hopes of ending the fish fight and providing the new industry more time to adjust to regulation.

The good news is that king salmon allocation appears to have reached equilibrium, but with guided anglers breaching the halibut GHL by 47% in 2C this year, there is a need to establish fair allocations for this species. If nothing is done in '07, commercial halibut fishermen could suffer an even greater loss of harvest share. The guided anglers benefit when times were good, so must also be prepared to share the impacts of reduced quotas with the consumers who buy commercially caught fish.

The Council previously dealt with this issue, by submitting an IFQ plan for halibut charter that was stalled by NOAA. ATA supports charter IFQ and is frustrated the program was not enacted. This seems unconscionable. The federal government imposed an IFQ program on longliners and is now allowing it to be undermined, as harvest shares are eroded through a failure to act. I had a tough time explaining the outlook for 2007 to one of our members – he runs a small boat and just bought several thousand shares of halibut IFQ at \$20/pound. Surely there is something the Council could do to hasten emergency regulations, even if it bears some risk.

At the height of the chinook allocation dispute in Southeast, a lawsuit was filed over the Board of Fisheries king salmon management plan (*Tongass Sportfishing Association v. State*). The court reviewed the entire record and found the BOF had taken a hard look at the relevant issues surrounding sport and commercial allocation. The court determined the Board acted appropriately, based on the information it used when exercising its discretion to secure sustained yield. With the growth of the guided sportfish catch – and the annual unknowns of stock abundance and participation – the BOF established, by regulation, an allocation and menu of options to maintain the health of the resource and bring stability to competing harvest sectors. While there are some jurisdictional differences, the broad themes are applicable to the Council halibut situation.

The Council has dealt with this issue for over 13 years. You analyzed, developed, and sent a charter IFQ plan to Commerce, where it languished through no fault of your own. You implemented a GHL approach, which obviously isn't working to control harvest. In '07 there will be far less halibut available – a fast growing guided angler catch trend – the potential for more charter operations – and commercial fishermen with outstanding IFQ loans losing harvest share. IPHC has stated its intent to manage for conservation and both IPHC and ADFG are offering to assist with implementation of a short term rule.

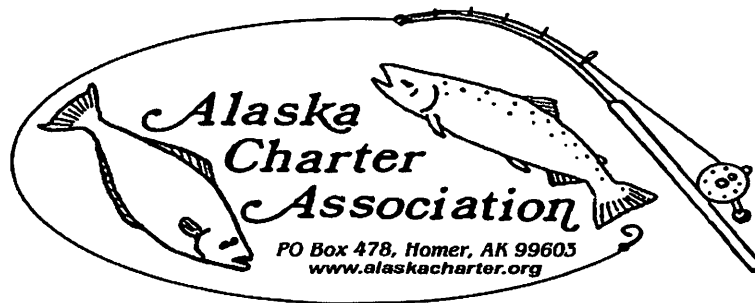
Our hope is that the Council will take action in 2007, alone or with the other agencies. Is there a risk? Perhaps. But corrective measures are warranted. The situation requires leadership and immediate action to head off future conservation problems, which would only exacerbate allocation. Based on past court decisions, it seems plausible that the Council could write a convincing record of decision explaining that any emergency action will be short term, is well-thought-out, based on years of data and harvester testimony, and intended to protect the resource, vulnerable economies, and US citizen's access – angler and consumer alike.

Simply focusing on a moratorium to respond to the current dilemma does not afford the same reasoned explanation.

ATA is committed to finding solutions that work for all user groups. Our members seek stability and success for all fisheries. Establishing a guided sport allocation, with an enforceable set of rules, benefits those who rely on halibut for a job, a special meal, or recreation. We ask all agencies to work with longline and charterboat representatives, at this meeting, to develop short and long range management actions in the 2007 season and beyond.

Respectfully Submitted,

Dale Kelley



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

December 06, 2006

Pretext for the Permanent Solution

Madame Chair and Council Members thank you for this opportunity to speak on behalf of the Alaska Charter Association. I am Greg Sutter, president of ACA, and owner/operator of Captain Greg's Charters in Homer, Alaska.

Foremost, this Council and all parties involved must be able to truly assess the social-economic impacts and multiplier effects before we proceed with the permanent solution. Hence, this study should be balanced and conducted so that it parallels both the commercial and charter sectors. The study should be ordered now and conducted by an organization approved by NMFS to help eliminate any perceived biases.

The ACA urges this Council to follow the spirit of President Clinton's and President George W. Bush's Executive Order 12866, Dr. Hogarth's directive to enhance recreational/sport fishing opportunities, employ the Ten National Standards found in the Magnusen-Stevens Act and develop a comprehensive Fishery Management Plan. We believe that if an FMP was under development thirteen years ago, we would not be at this juncture today. Also, we feel that this Council should allow the Stakeholder's process to continue; several good alternatives are being developed and explored. Please allow this process to continue.

The ACA strongly believes that the basic premise for the charter angler should be the same as for any recreational/sport angler. The bag limit for halibut for all recreational/sport anglers should remain consistent whether they choose to fish on a charter boat or any other boat. Their access should only be limited by the abundance of the resource. Anglers on charter boats do not consider themselves anything but recreational/sport anglers and should be treated accordingly.

This Council should employ the "highest and best" usage standards when making any allocation decision. As any portfolio manager would recommend, place your resources where you gain the highest returns, minimize risk and preserve your principle for future returns. Acknowledgement must be afforded to the fact that the public has a choice right now to purchase fish, or typically pay more to catch their own fish and enjoy the fulfilling experience of being out on the water. This activity should only be limited by the abundance of the resource, and we should not create expensive artificial barriers to the current open market.

As with any business model, the future is impossible to accurately predict, especially when it comes to tourism and fish, both can fluctuate widely. And a good crystal ball is hard to find. But we must attempt to predict trends and base forecasts on a ten year horizon, review these trends annually and make adjustments at least every three years.

We must assess the current fleet size, look at its overall capacity, identify areas of saturation and well as areas where growth is warranted, and balance it with projected angler growth or decline.

The ACA's position is to keep the program as simple as possible, and provide maximum benefit to the State of Alaska, the United States and sport anglers. The most widely used program across the country is a percentage allocation. Since we have a very low allocation in Alaska, it should be adjusted upward with a balance based upon our fleet size and anticipated angler demand.

Bryan Bondioli
p.o. box 66
Homer, Ak. 99603
907-235-0629

Madam Chair, Members of the Council,

My name is Bryan Bondioli. I own and operate a charter in Homer and am Secretary of the Ak. Charter Association.

Over the past two years, in which I have been completely absorbed in this process, I have been respectful and considerate of this council and it's members as unique and new participants in the halibut charter issue. In December of last year I was encouraged that this body had an interest in managing the resource with some degree of fairness, logic, and a consideration for itself as it's own unique entity.

Over this period of time, I have studied thousands of pages of history, legalese, and minutes from Council process. As evidenced by the history, and ,as we all know there has never been a biological or conservation issue with regard to the halibut charter fishery. Every ounce of energy has been solely spent to protect the commercial investment. As a conservation and resource management body, may I remind you that investment regulation is not within the constitutional mandates of this council.

As an American citizen and taxpayer, I sit here today and wonder how many thousands of hours and millions of dollars have been spent to crush the smallest least impactful user of the resource. All of this time and energy with NO biological reason, No consideration for fairness and equitability, NO comprehensive or even adequate socioeconomic data; and No consideration for the Highest and Best use of the RESOURCE.

As a highly migratory species, the pacific halibut resource should be managed under a comprehensive FMP instead of piecemealed under special interest management plans. One half of the life of the North Council has been spent trying to make one poor policy acceptable. I recognize the desire of this Council to reach a point when a few million pounds of halibut will no longer dictate a huge chunk of their lives.

However, the reality of this process is exemplified by the events of the last year. The guided recreational sector has worked hard moving in the direction of a permanent long term solution. Yet, at the same time, the Halibut Coalition has continued to undermine the process. There have been four Council meeting, four stakeholders meetings and still two errant proposals have been interjected outside of the stakeholders purvue. I respectfully submit to this Council, that as individuals you should be angered and wary that this behavior is time consuming, expensive, and counterproductive to moving forward in a reasonable time frame.

I respectfully ask this council to recognize this history, recognize the future of the state of Alaska, and embrace it's own individuality. I encouraged you to use accurate and

comprehensive data encompassing all sectors, evaluate the highest and best use of the resource, and commit to a long term solution which is fair and equitable to ALL users and not just equitable for the largest user group. If we don't do it right this time we'll all still be here in another 14 years.

- PUBLIC REVIEW DRAFT -

**SUBSISTENCE HARVESTS OF
PACIFIC HALIBUT IN ALASKA, 2005**

by

James A. Fall, David Koster, and Brian Davis

Technical Paper No. 320



Preparation of this report was supported through NOAA Award No. NA04NMF4370314,
U.S. Department of Commerce, National Oceanic and Atmospheric Administration,
National Marine Fisheries Service.

Division of Subsistence
Alaska Department of Fish and Game
PO Box 115526
Juneau, Alaska 99811-5526

November 15, 2006

OEO/ADA STATEMENT: The Office of Equal Opportunity (OEO) statement for use in Alaska Department of Fish and Game Publications:

The Alaska Department of Fish and Game administers all programs and activities free from discrimination based on race, color, national origin, age, sex, religion, marital status, pregnancy, parenthood, or disability. The department administers all programs and activities in compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972.

If you believe you have been discriminated against in any program, activity, or facility please write:

- ADF&G ADA Coordinator, PO Box 115526, Juneau, AK 99811-5526. The department's ADA Coordinator can be reached via phone at the following numbers: (VOICE) 907-465-6077, (Statewide Telecommunication Device for the Deaf) 1-800-478-3648, (Juneau TDD) 907-465-3646, or (FAX) 907-465-6078.
- U.S. Fish and Wildlife Service, 4040 N. Fairfax Drive, Suite 300 Webb, Arlington, VA 22203
- Office of Equal Opportunity, U.S. Department of the Interior, Washington DC 20240.

For information on alternative formats and questions on this publication, please go to <http://www.subsistence.adfg.state.ak.us/> for contact information.

ABSTRACT

SUBSISTENCE HARVESTS OF PACIFIC HALIBUT IN ALASKA, 2005

This report describes the results of the third annual study by the Division of Subsistence of the Alaska Department of Fish and Game to estimate the subsistence halibut harvest in Alaska since the National Marine Fisheries Service adopted rules governing subsistence halibut fishing in 2003. Data were collected through a voluntary mail-out survey of all holders of subsistence halibut registration certificates. The survey response rate was 60% (8,565 returned of 14,306 mailed.). An estimated 5,621 individuals subsistence fished for halibut in 2005, compared to 5,984 subsistence fishers in 2004, and 4,942 in 2003. The estimated subsistence halibut harvest in 2005 was 55,875 fish for 1,178,222 pounds (+/- 3.0%) net weight. This compares to a harvest estimate of 52,412 fish for 1,193,162 pounds (+/- 1.5%) in 2004 and 43,926 halibut and 1,041,330 pounds net weight (+/- 3.9%) in 2003. Of the total subsistence halibut harvest in 2005, 70% was harvested with setline gear and 30% with hand-operated gear. As in 2003 and 2004, the largest portion of the Alaska subsistence halibut harvest in 2005 occurred in Regulatory Area 2C (Southeast Alaska), 51%, followed by Area 3A (Southcentral Alaska), 36%. Subsistence harvests represent about 1.5% of the total halibut removals in Alaska in 2005. The harvest estimates based on the surveys for 2003, 2004, and 2005 serve as a start for understanding the overall harvest, annual variability in catch, and whether any increase in harvest may be associated with implementation of the new regulations. Although the 2005 harvest estimate is about the same as the 2004 estimate and somewhat higher than the 2003 estimate, there are no certain trends in the fishery. The report recommends that research be continued for 2 more years, so that 5 years of data under the current set of regulations can be evaluated.

EXECUTIVE SUMMARY

This report presents findings of a study designed to estimate the subsistence harvest of Pacific halibut *Hippoglossus stenolepis* in Alaska in 2005. The Division of Subsistence of the Alaska Department of Fish and Game conducted the study through NOAA Award No. NA04NMF4370314 from the U.S. Department of Commerce, National Oceanic and Atmospheric Administration, the National Marine Fisheries Service (NMFS). In May 2003, NMFS published federal regulations implementing a subsistence halibut fishery in Alaska for qualified individuals who are residents of 117 rural communities or members of 123 Alaska Native tribes with traditional uses of halibut. 2005 was the third year in which subsistence halibut fishing took place under these regulations. Subsistence fishers are required to obtain a subsistence halibut registration certificate (SHARC) from NMFS before fishing. By the end of 2005, 14,306 individuals had obtained SHARCs, compared to 13,813 by the end of 2004 (an increase of 4% from 2004 to 2005) and 11,635 by the end of 2003 (a 19% increase from 2003 to 2004 and a 23% increase from 2003 to 2005).

Harvest information was collected by means of a mail-out survey. The one-page survey form was mailed to all SHARC holders in early 2006, with two follow-up mailings. Household visits supplemented the mailings in selected communities. In total, 8,565 surveys were returned, a response rate of 60%. Participation in the survey was voluntary.

According to the study findings, an estimated 5,621 individuals subsistence fished for halibut in 2005, compared to an estimated number of subsistence fishers of 5,984 in 2004, and an estimated 4,942 subsistence halibut fishers in 2003. The estimated subsistence halibut harvest in 2005 was 55,875 fish (+/- 3.0%) for 1,178,222 pounds (+/- 3.0%) net weight. ("Net weight" is 75 percent of "round" or live weight; the estimated harvest was 1,570,963 pounds round weight.) This compares to a harvest estimate of 52,412 fish (+/- 1.6%) for 1,193,162 pounds (+/- 1.5%) in 2004 and 43,926 halibut and 1,041,330 pounds net weight (+/- 3.9%) in 2003. The 2005 harvest was about 1% lower than the estimated harvest for 2004, whereas the 2004 harvest estimate was 15% higher than the 2003 harvest estimate. The 2005 estimated harvest was 13% higher than the estimate for 2003.

Of the total subsistence halibut harvest in 2005, 824,006 pounds (70%) were harvested with setline (stationary) gear (longlines or skates) and 354,216 pounds (30%) were harvested with hand-operated gear (rod and reel or handline). This was similar to the harvest by gear type in 2004 (74% setline and 26% hand operated gear) and 2003 (72% setline and 28% hand-operated gear). Of those subsistence fishers using setline gear in 2005, the most (42%) usually fished with 30 hooks, the maximum number allowed by regulation in all areas except Areas 4C, 4D, and 4E.

Subsistence fishers also harvested an estimated 12,395 rockfish *Sebastes* spp. and 2,355 lingcod *Ophiodon elongatus* in 2005 while fishing for halibut. In 2004, subsistence halibut fishers harvested 19,001 rockfish and 4,407 lingcod. In 2003, subsistence halibut fishers had an estimated incidental harvest of 14,870 rockfish and 3,298 lingcod.

The largest portion of the Alaska subsistence halibut harvest in 2005 occurred in Regulatory Area 2C (Southeast Alaska), 51% (598,072 pounds); followed by:

- Area 3A (Southcentral Alaska), 36% (429,275 pounds);
- Area 4E (East Bering Sea Coast), 5% (54,119 pounds);
- Area 3B (Alaska Peninsula), 4% (46,225 pounds);
- Area 4A (Eastern Aleutian Islands), 3% (35,615 pounds);
- Area 4C (Pribilof Islands), 1% (7,716 pounds);
- Area 4D (Central Bering Sea), less than 1% (5,848 pounds); and
- Area 4B (Western Aleutian Islands), less than 1% (1,351 pounds).

In 2004 and 2003 as well, Area 2C and Area 3A accounted for most of the subsistence harvest harvests. The proportion of the statewide subsistence halibut harvest occurring in Area 2C declined to 51% in 2005, compared to 57% in 2004 and 60% in 2003. Correspondingly, the portion occurring in Area 3A increased in 36% in 2005, from 34% in 2004 and 27% in 2003.

Preliminary data from the International Pacific Halibut Commission combined with the findings of this study indicate that 81.165 million pounds (net weight) of halibut were removed from Alaskan waters in 2005. Of this total, the subsistence harvest accounted for 1.5%. Commercial harvests took 72.3% percent of the halibut, followed by bycatch in other commercial fisheries (14.1%), sport harvests (9.9%), and wastage in the commercial fishery (2.2%).

This report describes the results of the third annual study to estimate the subsistence halibut harvest in Alaska since NMFS adopted rules governing subsistence halibut fishing in May 2003. The harvest estimates based on the SHARC surveys for the 2003, 2004, and 2005 fishing seasons serve as a start for understanding the overall harvest, annual variability in catch, and whether any increase in harvest may be associated with implementation of the new regulations. Demonstrating changes in the magnitude of the Alaska subsistence halibut harvest resulting from the new regulations using the results of the SHARC surveys for 2003 through 2005 is problematic, however, because of the limitations of earlier harvest estimates at the statewide level. The subsistence harvest estimates for 2003, 2004, and 2005 for some of the larger communities, such as Sitka, Petersburg, and Kodiak, which account for the majority of the harvest, are similar to harvest estimates based on household surveys prior to the new regulations. The higher overall harvest estimates for 2005 and 2004 compared to 2003 may due to more thorough registration of subsistence fishers, hence better harvest documentation. Additional years of harvest data will be necessary for shedding light on these and other factors that shape the subsistence halibut harvest in Alaska.

The report concludes that 1.2 million net pounds is a sound estimate of the Alaska subsistence halibut harvest in 2005. The estimate is based upon a scientific sampling of SHARC holders and a relatively high response rate. The total estimated harvest falls below the 1.5 million net pounds estimated for the subsistence harvest when the current regulations were developed by the North Pacific Fishery Management Council (see

www.fakr.noaa.gov/frules/70fr16742.pdf , page 16748). Although the 2005 harvest estimate is about the same as the 2004 estimate and somewhat higher than the 2003 estimate, there are no certain trends in the harvest. The report recommends that research be continued for 2 more years, so that 5 years of data under the current set of regulations governing gear, participation requirements, and daily harvest limits can be evaluated.

TABLE OF CONTENTS

List of Tables	iii
List of Figures	iv
List of Acronyms Used in the Report	vi
Acknowledgements.....	vii
Chapter 1: Background and Methods	1
Background.....	1
Project Objectives	2
Data Collection Methods	2
Public Outreach.....	2
Mailed Household Survey.....	2
Community Visits	4
Sample Achievement	6
Data Analysis	7
Data Entry	7
Analysis: Development of Harvest Estimates.....	7
Supplemental Mailing and In-Season Study.....	10
Products.....	10
Chapter 2: Findings.....	13
Subsistence Halibut Harvests in 2005.....	13
Estimated Number of Subsistence Halibut Fishers.....	13
Estimated Alaska Subsistence Halibut Harvests in 2005 by SHARC Type and Regulatory Area.....	14
Estimated Alaska Subsistence Halibut Harvests in 2005 by Harvest Location.....	15
Subsistence Halibut Harvests by Place of Residence	17
Subsistence Harvests by Gear Type.....	18
Number of Hooks Fished with Setline Gear	18
Sport Harvests of Halibut by SHARC Holders.....	19
Average Net Weights of Subsistence and Sport-Caught Halibut	20
Rockfish Harvests	20
Lingcod Harvests	21
Chapter 3: Discussion	23
Comparisons with Other Harvest Estimates	23
Community Case Studies.....	24
Sitka	24
Petersburg	26
Cordova.....	27
Port Graham	28
Kodiak City and Road System	29
Sand Point.....	30
Unalaska/Dutch Harbor	31
Toksook Bay	32

Tununak	33
Comparisons with Non-Subsistence Harvests in 2005	33
Chapter 4: Conclusions and Recommendations	35
Summary and Conclusions	35
Recommendations.....	37
References Cited	39
Report Tables	41
Report Figures.....	
Appendix A. List of Eligible Tribes and Rural Communities.....	
Appendix B. Letter to Tribes.....	
Appendix C. News Release.....	
Appendix D. Newspaper Notice.....	
Appendix E. Survey Form.....	
Appendix F. Survey Instructions	
Appendix G. Frequently Asked Questions.....	
Appendix H. Harvest Survey Appendix Tables	
Appendix I. Findings from the Supplemental Mailing to SHARC Holders from Kodiak and Sitka, 2005	
Appendix J. Project findings summary	

LIST OF TABLES

Table 1.	Population of Rural Communities Eligible to Participate in the Alaska Subsistence Halibut Fishery, 2000 and 2005
Table 2.	Project Chronology, 2005 Study Year
Table 3.	Sample Achievement, Alaska Subsistence Halibut Survey for 2005, By Eligible Alaska Tribe, Eligible Alaska Rural Community, and Place of Residence of SHARC Holders.....
Table 4.	Estimated Alaska Subsistence Harvests of Halibut, Sport Halibut Harvests by SHARC Holders, and Incidental Harvests of Lingcod and Rockfish by SHARC Type and Regulatory Area of the Tribe or Rural Community of Registration by the SHARC Holder, 2005
Table 5.	Age of Subsistence Halibut Registration Certificate Holders by SHARC Type, 2005
Table 6.	Estimated Alaska Subsistence Harvests of Halibut by Halibut Regulatory Area, and Subarea Fished and by Gear Type, and Estimated Sport Harvests by SHARC Holders, 2005.....
Table 7.	Alaska Subsistence Halibut Harvests in 2003, 2004, and 2005 by Geographic Area Fished
Table 8.	Number of Hooks Usually Fished, Setline (Stationary) Gear, Alaska Subsistence Halibut Fishery, 2005.....
Table 9.	Average Net Weight of Subsistence and Sport Harvested Halibut, 2005, by Regulatory Area Fished
Table 10.	Estimated Harvests of Lingcod and Rockfish by SHARC Holders While Subsistence Fishing for Halibut, by Regulatory Area and Geographic Subarea Fish, 2005
Table 11.	Estimated Harvests of Halibut by Gear Type and Participation in Subsistence and Sport Fisheries, Selected Alaska Communities, 2003, 2004, and 2005.....
Table 12.	Estimated Harvests of Halibut for Home Use, Sitka
Table 13.	Estimated Harvests of Halibut for Home Use, Petersburg
Table 14.	Estimated Harvests of Halibut for Home Use, Cordova.....
Table 15.	Estimated Harvests of Halibut for Home Use, Port Graham.....
Table 16.	Estimated Harvests of Halibut for Home Use, Kodiak Road System.....
Table 17.	Halibut Removals in Alaska by Regulatory Area, 2005.....
Table 18.	Comparison of Selected SHARC Results, 2003, 2004, and 2005 Study Years.....

Appendix Tables

Table A-1	Results from Returned Surveys by Eligible Alaska Tribe, Eligible Alaska Rural Community, and Place of Residence, 2005.....
Table A-2	Reported Harvests of Halibut in Number of Fish by Return Category, Eligible Alaska Tribe, Eligible Alaska Rural Community, and Community of Residence, 2005.....
Table A-3	Estimated Alaska Subsistence Harvests of Halibut by Eligible Alaska Tribe and Eligible Alaska Rural Community, by Gear Type and Regulatory Area in Number of Fish and Pounds Net Weight, 2005

Table A-4 Estimated Subsistence and Sport Harvests of Halibut and Harvests of Lingcod and Rockfish by Place of Residence, 2005.....

Table A-5 Estimated Subsistence Harvests of Halibut by Gear Type and Place of Residence, 2005

Table A-6 Estimated Number of SHARC Holders Who Either Subsistence or Sport Fished for Halibut by Place of Residence, 2005.....

Table A-7 Estimated Subsistence Harvests of Halibut and Sport Harvests of Halibut, Pounds Net Weight, and Incidental Harvests of Lingcod and Rockfish by Eligible Alaska Tribe and Eligible Alaska Rural Community SHARC Holders, 2005

LIST OF FIGURES

Figure 1. Regulatory Areas for the Pacific Halibut Fishery

Figure 2. Number of Surveys Returned and Return Rates for Subsistence Halibut Surveys by SHARC Type, 2005

Figure 3. Subsistence Halibut Harvest Survey Return Rates, Communities and Tribes with More than 100 SHARCs Issued, 2005.....

Figure 4. Return Rate by Place of Residence, 2005

Figure 5. Number of Survey Responses by Response Category, 2005

Figure 6. Number of SHARCs Issued and Estimated Number of Subsistence Halibut Fishers in Alaska by SHARC Type, 2003, 2004, and 2005

Figure 7. Age of Subsistence Halibut Registration Certificate Holders by SHARC Type, 2005

Figure 8. Estimated Number of Subsistence Halibut Fishers, 2003, 2004, and 2005, By Regulatory Area of Tribe or Rural Community

Figure 9. Estimated Number of Subsistence Halibut Fishers by Place of Residence (Selected Communities), 2003, 2004, and 2005.....

Figure 10. Estimated Subsistence Harvest of Halibut in Alaska, 2005, by Regulatory Area of Tribe and Rural Community, in Pounds Net Weight.....

Figure 11. Estimated Alaska Subsistence Halibut Harvests in Pounds Net Weight by SHARC Type, 2003, 2004, and 2005

Figure 12. Percentage of Tribal Subsistence Halibut Harvest by Tribe, 2005

Figure 13. Percentage of Rural Community Subsistence Halibut Harvest by Community, 2005

Figure 14. Percentage of Subsistence Halibut Harvest by Regulatory Area Fished, 2005

Figure 15. Alaska Subsistence Halibut Harvests by Geographic Area, 2005

Figure 16. Percentage of Alaska Subsistence Halibut Harvest by Geographic Area, 2005.....

Figure 17. Estimated Subsistence Halibut Harvests, Pounds Net Weight, by Regulatory Area Fished, 2003, 2004, and 2005.....

Figure 18. Change in Alaska Subsistence Halibut Harvests from 2004 to 2005 by Regulatory Area Fished

Figure 19. Change in Alaska Subsistence Halibut Harvests from 2003 to 2005 by Regulatory Area Fished

Figure 20. Average Subsistence Harvest of Halibut per Fisher in Alaska, 2005, by Regulatory Area, in Pounds Net Weight.....

Figure 21. Average Subsistence Harvest of Halibut per Fisher in Alaska, 2005, by Regulatory Area, in Number of Fish.....

Figure 22. Alaska Subsistence Halibut Harvests by Place of Residence, 2005

Figure 23. Percentage of Subsistence Halibut Harvest by Gear Type by Regulatory Area, 2005

Figure 24. Number of Hooks Usually Fished, Percentage of Fishers Using Setline (Stationary) Gear, Alaska Subsistence Halibut Fishery, 2005.....

Figure 25. Estimated Incidental Harvest of Rockfish in the Alaska Subsistence Halibut Fishery, 2003, 2004, and 2005 by Regulatory Area Fished.....

Figure 26. Percentage of Incidental Harvest of Rockfish by Regulatory Area Fished, 2005

Figure 27. Estimated Incidental Harvest of Lingcod in the Alaska Subsistence Halibut Fishery, 2003, 2004, and 2005, by Regulatory Area Fished.....

Figure 28. Percentage of Incidental Harvest of Lingcod by Regulatory Area Fished, 2005

Figure 29. Estimated Harvests of Halibut for Home Use, Port Graham.....

Figure 30. Halibut Removals, Alaska, 2005

Figure 31. Halibut Removals in Alaska by Regulatory Area and Removal Category, 2005

LIST OF ACRONYMS USED IN THE REPORT

ADF&G	Alaska Department of Fish and Game
ANHSC	Alaska Native Harbor Seal Commission
ANSHWG	Alaska Native Subsistence Halibut Working Group
BOF	Alaska Board of Fisheries
CDQ	Community Development Quota
CPDB	Community Profile Database (of the Division of Subsistence)
CSIS	Community Subsistence Information System (of the Division of Subsistence)
EVOS	<i>Exxon Valdez</i> Oil Spill
IPHC	International Pacific Halibut Commission
LAMP	Local area management plan
NMFS	National Marine Fisheries Service
NPFMC	North Pacific Fishery Management Council
RAM	Restricted Access Management Office, NMFS
PID/DAV	Permanent identification cards issued to Alaska residents over 60 years of age (PID) and sport fishing licenses issued to disabled veterans (DAV)
SHARC	Subsistence Halibut Registration Certificate
STA	Sitka Tribe of Alaska
SWHS	Alaska Sport Fishing Statewide Household Survey

ACKNOWLEDGEMENTS

First and foremost, we thank the thousands of individuals who took the time to voluntarily respond to the mailed survey form. This report would not be possible without their cooperation.

Staff within the National Marine Fisheries Service (NMFS) who facilitated the grant that funded this project and who otherwise provided project support included Jay Ginter and Alfred “Bubba” Cook. Staff within the Restricted Access Management program of NMFS (RAM) administered the subsistence halibut registration certificate (SHARC) program and helped provide information to the public about the research. We thank Phil Smith, Jessica Gharrett, Tamara Bledsoe, Toni Fratzki, Robin Martin, Tracy Buck, Amberly Lail, Allen Butner, Marie Wilson, Clydina Bailey, Mindy Jones, Kathleen Coleman, and Troy Ryder.

We gratefully acknowledge the input and support of the Alaska Native Subsistence Halibut Working Group. We also thank the many tribal governments that granted approvals for the several survey projects with which the subsistence halibut research was coordinated, and the local research assistants who helped with these projects. Especially, we thank the Sitka Tribe of Alaska (Ms Robi Craig), and the Hydaburg Cooperative Association (Anthony Christianson) for assisting with administering surveys in their communities. Staff of the Central Bering Sea Fishermen’s Association who helped with project outreach and reviewed SHARC lists and draft results included Rena Kudrin, Phillip Lestenkof, and Raymond Melovidov. Special thanks are also extended to tribal administrator Cecelia White of the Nunakauyak Traditional Council and acting tribal administrator Andrew Chikoyak of the Tununak IRA Council for their assistance in administering surveys in the communities of Toksook Bay and Tununak, respectively.

In addition to the co-authors of this report, other Division of Subsistence staff who assisted with research, data management, and report preparation included Bertha Angnabooguk, Heather Bishop, Crystal Brien, Allison Kionka, Nicole Cummings, Mike Turek, Mathew Brock, Pippa Coiley Kenner, Lisa Scarbrough, Ron Stanek, Liz Williams, Molly Chythlook, Ted Krieg, Tracie Krauthoefer, Chris Bach, Jim Simon, and Jesse Dizard. Nonpermanent ADF&G Fish and Wildlife Technicians Rose Johnson and Nyna Fleury conducted surveys in Ketchikan and Saxman.

Heather Gilroy and Gregg Williams (staff to the International Pacific Halibut Commission) provided background information and comments on a draft of this report. Several of the above-mentioned ADF&G and NMFS staff also offered comments and suggestions on the preliminary draft, as did Jason Gasper of NMFS, and Elizabeth Andrews and Scott Meyer of ADF&G. The authors of this report are of course responsible for any errors or deficiencies that the report may still contain.

CHAPTER 1: BACKGROUND AND METHODS

BACKGROUND

The primary goal of this project was to estimate the subsistence harvest of Pacific halibut *Hippoglossus stenolepis* in Alaska in 2005 through a survey mailed to registered subsistence halibut fishers and supplemented by a limited number of face-to-face interviews in selected communities. This was the third year for which the research was conducted. (See Fall et al. [2004] for the results for 2003 and Fall et al. [2005] for the results for 2004.) The Division of Subsistence of the Alaska Department of Fish and Game (ADF&G) administered the project through a grant from the National Marine Fisheries Service (NMFS) (Award Number NA04NMF4370314).

In Alaska's coastal areas, subsistence halibut fisheries are local, noncommercial, customary and traditional food fisheries, as noted by Wolfe (2002) and described in *Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for a Regulatory Amendment for Defining a Halibut Subsistence Fishery Category* (an "EA/RIR/IRFA") by NPFMC, ADF&G, IPHC, and NMFS, August 11, 2000 (NMFS 2000; see also NMFS 2003). The EA/RIR/IRFA summarizes information about the subsistence halibut fishery in Alaska. This background information is not repeated here but provided the basis for the NPFMC's recommendation for subsistence halibut fishing regulations in Alaska. Figure 1 illustrates halibut regulatory areas in Alaska.

In April 2003, the National Marine Fisheries Service, Alaska Region, published federal regulations implementing a subsistence halibut fishery for qualified individuals in the waters in and off Alaska (68 FR 18145, April 15, 2003) (see www.fakr.noaa.gov/frules/fr18145.pdf). In total, residents of 117 rural communities¹ and members of 123 Alaska Native tribes are eligible to participate in the fishery.² (See Appendix A for a list of eligible tribes and communities as they appear in the Federal Register.) Subsistence halibut fishers are required to obtain a Subsistence Halibut Registration Certificate (SHARC) from the Restricted Access Management Program (RAM) office of NMFS prior to fishing. These federal regulations (50 CFR Part 300.65(h)(4)) authorize periodic surveys of holders of SHARCs to estimate annual subsistence harvests and related catch and effort information. The regulation states that, "Responding to a subsistence halibut harvest survey will be voluntary."³

Table 1 provides population estimates for the eligible rural communities for 2000 based on the federal decennial census. The total population of these communities in 2000 was 82,572, of which 38,977 were Alaska Natives. In addition, the non-rural places of Juneau and Ketchikan in

¹ In December 2004, the NPFMC adopted a recommendation to the Secretary of Commerce to add Naukati Bay to the list of eligible rural communities. Regulations implementing this change had not been approved as of the preparation of this report.

² Note that the Northern Pacific Halibut Act of 1982, under which the Alaska subsistence halibut fishery regulations are authorized, provides for fair and equitable allocations of halibut among U.S. fishers, but does not establish priorities for those allocations (see www.fakr.noaa.gov/frules/70fr16742.pdf, page 16747).

³ The subsistence rules were amended in 2005 by regulations published in the Federal Register at 70 FR 16742, April 1, 2005. Among other things, this amendment provisions for obtaining Community Harvest Permits, Ceremonial Permits, and Educational Permits.

2000 had Alaska Native populations of 5,084 and 2,689, respectively, most of whom were eligible to participate in the subsistence halibut program through their tribal membership. Also, an unknown number of eligible tribal members lived in other nonrural places such as Anchorage and the Kenai Peninsula Borough. As also shown in Table 1, estimates published by the State of Alaska for 2005 report a total population of 81,937 for eligible rural communities. Updated population estimates by ethnicity are not available.

PROJECT OBJECTIVES

The primary goal of the project was to estimate the subsistence harvest of halibut in Alaska in the calendar year 2005. Objectives included:

1. An estimate of the subsistence harvest of halibut in Alaska in 2005 by community, tribe, gear type, and IPHC regulatory area, along with an estimate of the number of individuals who subsistence fished for halibut in 2005.
2. An estimate of the harvest of halibut by SHARC holders while sport fishing in 2005.
3. An estimate of the number of lingcod *Ophiodon elongatus* and rockfish *Sebastes* spp. taken by subsistence fishers while subsistence fishing for halibut in 2005.

DATA COLLECTION METHODS

Public Outreach

In mid December 2005, the Division of Subsistence sent a letter to all eligible tribes informing them about the third year of the research. This communication also included a copy of the short summary of the findings for 2004. (Appendix B is a copy of the letter sent to all eligible tribes.) Each tribe also received a copy of the full final report for 2004. In January 2006, announcements were made through the media (local newspapers and radio stations) about the upcoming mailing of halibut survey forms to SHARC holders. Appendix C is a copy of the ADF&G news release of January 31, 2006. Appendix D is a copy of an announcement that ran in the following Alaska newspapers in late January 2006: Kodiak Daily Mirror, Bristol Bay Times (Dillingham), the Dutch Harbor Fisherman, the Tundra Drums (Bethel), the Cordova Times, the Sitka Sentinel, the Ketchikan Daily News, the Petersburg Pilot, the Wrangell Sentinel, the Chilkat Valley News (Haines), the Juneau Empire, and the Capital City Weekly. Bethel radio station KYUK played a reminder message during the Tundra Drums radio show in late February and early March. Information was also available on the NMFS web site for subsistence halibut fishing in Alaska (<http://www.fakr.noaa.gov/ram/subsistence/halibut.htm>).

Mailed Household Survey

As noted, this was the third year of a harvest assessment program for the subsistence halibut fishery in Alaska. Because the subsistence halibut regulations only came into effect in May 2003, the first several years of collecting harvest data should be viewed as exploratory. It was expected that harvest estimates for some communities and tribes would be incomplete, based upon relatively low response rates or incomplete registration of halibut fishers with NMFS.

Subsequent years will build upon the lessons learned in the early years of the project and benefit from outreach efforts to improve response rates. (See recommendations in Chapter 4.)

As recommended by Wolfe (2002), the methodology was based upon the registration system for all subsistence halibut fishers, which requires fishers to obtain a SHARC before fishing. All individuals who held a valid SHARC for any portion of 2005 as of December 31, 2005 were surveyed with a mailed, retrospective recall form covering a 12-month harvest period in calendar year 2005.⁴

The survey instrument was virtually identical to the form used for the 2003 and 2004 study years. It is based on recommendations by Wolfe (2002:Appendix A), with slight modifications such as study year and return address. (See Appendix E in this report for a copy of the 2005 survey instrument.) Wolfe (2002: 15-18) provided justification for the kinds of data to be collected, which included name and address of the fisher; halibut harvests in numbers and pounds round (whole) weight by gear type in 2005; number of hooks usually set; and harvests of lingcod and rockfish taken while subsistence fishing for halibut. In 2003, a question addressing the water body fished (primary location) while subsistence fishing was added at the recommendation of NMFS staff. This question was retained for 2004 and 2005, and another was added in 2004 to record the location of sport halibut fishing by SHARC holders. The form was designed to reduce the potential double counting of halibut taken with rod and reel gear in both the subsistence survey and the Sport Angler Survey conducted by the Department of Fish and Game, Division of Sport Fish (Wolfe 2002:19) by asking respondents to distinguish between their subsistence and sport harvests with this gear type.

A short explanatory letter with instructions on the back for completing the form was included in the mailings (Appendix F). The form was designed so that it could be directly mailed to the Division of Subsistence, postage paid.

Presently, under International Pacific Halibut Commission (IPHC) regulations, Community Development Quota (CDQ) fishers may retain halibut under 32 inches ("shorts") while commercial CDQ fishing in Areas 4D and 4E only. These regulations require the CDQ organization to report this harvest to the IPHC. To avoid double counting, subsistence fishers were instructed not to include these fish on their subsistence halibut survey forms.

During a meeting of the Alaska Native Subsistence Halibut Working Group (ANSHWG) on October 9, 2003, before the mail-out survey for the first study year, community representatives expressed concern that not all fishers would know what fish are to be included under the category "rockfish" for the incidental harvest question on the survey form. This could lead to an overestimation of this harvest if fishers reported fish such as Pacific cod or sculpins in response to this question. The instructions mailed with the survey provided guidance on this question.⁵

⁴ SHARCs issued to non-tribal residents of eligible rural communities are valid for 2 years. Therefore, SHARCs issued beginning in May 2003 began to expire starting in May 2005 and had to be renewed. Some SHARC holders did not renew and therefore were not eligible to participate in the subsistence halibut fishery for all of 2005. See also the section on data analysis, below.

⁵ The principal investigators for this study are aware that more than 30 species of rockfish inhabit Alaska waters. (See Alaska Administrative Code 5 AAC 39.975 for definitions of management assemblages of rockfishes.) The goal of this study was to keep the questions about incidental harvests simple. As discussed in the recommendations

Table 2 provides a chronology of key activities during the project. The first mailing to 14,306 SHARC holders occurred on February 2, 2006. The second mailing to 8,973 SHARC holders occurred on March 21, 2006. The third mailing to 6,739 SHARC holders took place on April 25, 2006. Table 3 provides a summary of response rates by mailing, SHARC type, and place of residence.

The Division of Subsistence set up a dedicated e-mail address that recipients of the mailed survey could use if they had questions about how to respond. Also, the RAM Program set up a toll-free number (1-800-304-4846) to provide information about the subsistence halibut program, including the harvest assessment program. Both the e-mail address and 1-800 phone number appeared on the survey form. A set of “frequently asked questions” and responses was developed by ADF&G and NMFS staff members to guide staff responses to phone calls and e-mail inquiries about how to fill out the survey form (Appendix G).

Community Visits

Because the response rate to the mailed survey varied by community and tribe in the first study year, the mailings were again supplemented in selected communities with face-to-face household surveys conducted by Division of Subsistence staff or local research assistants. The latter were hired through subcontracts with tribes or Alaska Native regional organizations or, in Ketchikan, by ADF&G as temporary Fish and Wildlife Technicians. Because of the large number of eligible communities and tribes, it was not possible to conduct face-to-face surveys in most communities. Therefore, communities and tribes were divided into four categories based upon the potential need and opportunity to conduct household surveys in order to augment the mailed survey returns.

A. Category A Communities: Coordination with Other Fieldwork

Communities in this category were already part of other Division of Subsistence harvest assessment survey projects that entailed household visits and face-to-face interviewing. Reminding interviewees about the subsistence halibut surveys became part of these interviews. As noted above, all SHARC holders were mailed survey forms, including those living in communities where household surveys were planned. In most cases, these individuals had received the mailed forms before these community visits took place.

Through a contract with the Alaska Native Harbor Seal Commission (ANHSC), the Division of Subsistence and the ANHSC conduct annual household surveys in approximately 60 communities to collect harbor seal and sea lion harvest data from Alaska Native subsistence hunters. For the 2005 study year, most of these interviews took place in late January, February, and March 2006. In many of the study communities (especially in Southeast Alaska), only known marine mammal hunters were interviewed, but in others (primarily the smaller

section (see Chapter Four), if more precise harvest data for various rockfish are needed for particular areas, future research should be designed and funded to address these data needs.

communities), the goal was to interview all Alaska Native households.⁶ In most communities, local assistants hired to conduct the marine mammal interviews were asked to remind people they were interviewing to return the halibut survey form.

B. Category B Communities: Plan to Conduct Interviews

This category included selected communities with relatively high numbers of SHARC holders for which good response rates were especially important. As in the first study year, this included Toksook Bay, Sitka, and Hydaburg. As recommended in the final report for the 2003 study year, interviewing also took place in Ketchikan and Saxman for 2004 harvests. In 2006, interviews were administered in these 5 communities to record 2005 harvests. The surveys were administered face-to-face or by phone. Division of Subsistence staff member Mathew Brock traveled to Sitka, Ketchikan, and Saxman for meetings about the project.

As noted in the final report for 2003, in Toksook Bay, the number of SHARCs issued (527 were valid in 2005) approximates the community's total population. Meetings with community leaders in early 2004 determined that there are about 90 to 100 active halibut fishers in Toksook Bay, but only about a third to one-half fish in a particular year. Therefore, as for 2003 and 2004, a Division of Subsistence staff member, Christoph Bach, visited the community, in March and April 2006. He reviewed the list of SHARC holders and conducted interviews with halibut fishers who had not yet returned the mailed surveys. Most of the identified subsistence halibut fishers in Toksook Bay returned SHARC surveys through the mail or were interviewed by Bach. Bach also visited the community of Tununak in March 2006, where he also reviewed the list of SHARC holders and conducted interviews with halibut fishers who had not yet returned the mailed surveys. This was the first year that Tununak participated in the project.

C. Category C Communities: Evaluate for Possible Interviewing

Division staff assessed response rates by community and tribe after the second mailing. The plan was to travel to selected communities to administer the surveys, but it was determined that this was unnecessary in most communities because they were already covered in Categories A and B, above, or had acceptable response rates and SHARC enrollments. Chris Bach contacted and interviewed some SHARC holders in several western Alaska (Area 4E) communities by phone.

In January 2005, principal investigator James Fall met with several representatives of the St. Paul tribal government while attending the annual meeting of the International Pacific Halibut Commission in Victoria, British Columbia. These tribal representatives were very concerned about the very low response rate to the 2003 mail-out survey by SHARC holders from St. Paul (17 percent; see Figure 3 in Fall et al. 2004:61), and supported actions that would improve the response rate and result in a reliable estimate of the subsistence halibut harvest for 2004. Subsequently, in March 2005, Fall and division information management coordinator Bridget Easley developed an informal agreement with the Central Bering Sea Fishermen's Association (CBSFA) for outreach and evaluation of the survey results. This informal agreement was renewed for the 2005 study year. In March 2006, staff at the CBSFA reviewed the list of St.

⁶ For a description of this project, including a complete list of study communities and sampling goals, see Wolfe et al. 2005.

Paul SHARC holders. They identified individuals who had left the community. They then divided the remaining names on the list into two groups: those who are active subsistence or commercial halibut fishers, and those who do not actively participate in either fishery (131 SHARC holders). This list was used during analysis of the survey results for St. Paul (see below). In addition, CBSFA staff posted flyers urging return of the mailed survey, ran an announcement about the survey on the local radio station, and were otherwise available to answer questions about the survey and the subsistence halibut program.

D. Category D Communities: Plan to rely on mail-out response only

Category D included most eligible communities. These communities were either too large to consider for face-to-face interviewing of all SHARC holders (such as Kodiak, Petersburg, and Wrangell) or were unlikely to harvest a large portion of the statewide total subsistence harvest based on the results of previous surveys or because of their relatively small population. In Chapter Four, there are recommendations regarding communities in which outreach and/or in-person interviewing should be considered for subsequent study years.

SAMPLE ACHIEVEMENT

Table 3 reports sample achievement by tribe, rural community, and community of residence. Overall, 8,565 surveys were returned by 14,306 SHARC holders, a response rate of 60% (Fig. 2). For residents of the 117 eligible rural communities who did not register as tribal members, 5,445 of 7,869 surveys were returned (69%). As shown in Figure 3, in 2005 there were 12 communities with more than 100 nontribal SHARC holders, accounting in total for 84% of all nontribal SHARCs issued in rural communities. Return rates were approximately 65% or better in all 12 of these communities, and were 70% or better in 6 of them.

Of the 6,437 individual tribal members who held SHARCs in 2005, 3,120 (48%) returned surveys. As shown in Figure 3, there were 15 tribes with more than 100 members who obtained SHARCs. Return rates for these 15 tribes varied widely, from 92% in Sitka (where a contract between the Division of Subsistence and Sitka Tribe of Alaska [the tribal governing body] facilitated survey returns) to 30% in Sand Point (where no outreach efforts took place other than the initial letter to the tribal government). In total, these 15 tribes accounted for 70% of all tribal SHARCs.

Figure 4 illustrates survey response rates by place of residence of SHARC holders for the 22 communities with 100 or more SHARC holders in 2005. These communities accounted for 81% of all SHARCs and 82% of all returned surveys.

Figure 5 shows the survey return rate by response category. After the first mailing, 5,824 surveys were returned, for a response rate of 41%. Responses to the second mailing added 1,180 surveys, a total response rate of 49% up to that point. Responses to the third and final mailing added 828 surveys, for a total response to the mail-out of 7,832 surveys, 55% of the 14,306 surveys initially mailed. In addition, surveys administered by staff, either ADF&G personnel or representatives of tribal organizations working with ADF&G, added 733 surveys. Most of these

were in Saint Paul, Hydaburg, Ketchikan, Toksook Bay, and Sitka. This brought the total response to 8,565 surveys, 60% percent of all individuals who held SHARCs in 2005.

The overall response rate for the survey for 2005 declined slightly compared to 2004, from 62% percent to 60%. The return rate for 2003, the first year of the survey, was 65%. The number of returned surveys has increased over the three years of the project, from 7,593 in 2003, to 8,524 in 2004, and 8,565 in 2005, reflecting the larger number of SHARC holders in 2004 and 2005 and the larger number of staff administered surveys in 2005. The response rate by mail declined from 62% in 2003 to 59% in 2004 and 55% in 2005. However, the number of surveys returned as “undeliverable” increased from 208 in 2003 to 617 in 2004 and 613 in 2005. Subtracting “undeliverables” from the mail-out totals gives a response rate by mail of 57% in 2005, compared to 62% in 2004 and 63% in 2003. More surveys were administered in person or through phoning in 2005 (755) compared to 2004 (355 surveys) or 2003 (392 surveys). The interviewing in Tununak and the effort to contact residents of several western Alaska communities by phone account for much of this increase.

DATA ANALYSIS

Data Entry

All returned survey forms were reviewed for completeness prior to data entry. Responses were coded following standardized codebook conventions used by Division of Subsistence. Staff within the Information Management Section of the division set up database structures within an MS SQL Server at ADF&G in Anchorage to hold the survey data. The database structures included rules, constraints, and referential integrity to insure that data were entered completely and accurately. Data entry screens were available on a secure Internet site. Daily incremental backups of the database occurred, and transaction logs were backed up hourly. Full backups of the database occurred twice weekly. This ensured that no more than one hour of data entry would be lost in the unlikely event of a catastrophic failure.

Survey responses were manually entered twice, and survey forms were electronically scanned. All data were compared programmatically for inconsistent data entry. Double data entry ensured a more accurate transfer of information from the coded survey forms into the database, and is a standard practice with data processing for the Division of Subsistence. Data did not pass to the processing phase until inconsistencies between the twice-entered data set were eliminated. The scanned survey forms also facilitated efficient data correction and editing.

Information was processed and analyzed using MS SQL programming. Initial processing included the performance of standardized logic checks of the data. Logic checks are often needed in complex data sets where rules, constraints, and referential integrity do not capture all of the possible inconsistencies that may appear.

Analysis: Development of Harvest Estimates

Analysis included review of raw data frequencies, cross tabulations, table generation, and estimates of population parameters. Missing information was dealt with situationally. The

Division of Subsistence has standard practices for dealing with missing information, such as minimal value substitution or use of an average response for similarly characterized households or communities. Typically, missing data are an uncommon, randomly occurring phenomenon in household surveys conducted by the division, as was the case in this project.

In general, estimates of harvests, levels of participation, and other findings were calculated based upon the application of weighted means (Cochran 1977). These calculations are standard methods for extrapolating sampled data. In this study, each tribe and rural community was a separate stratum for purposes of estimating total harvests. In most cases, the mean for returned SHARC surveys was applied to the total number of SHARCs issued for the tribe or community to calculate the estimated harvest. (See Appendix Table A-1 in Appendix H for the reported harvests for each tribe and community.) The formula for standard expansion of community harvests is:

$$H_i = \sum H_i$$

where $H_i = h_i W_i$

and $W_i = \frac{N_i}{n_i}$ (Harvest weight factor per strata i)

H_i = the total harvest (numbers of fish or pounds),

H_i = the total harvest for tribe or community i

W_i = the weight factor for tribe or community i,

h_i = the total harvest reported in returned surveys for tribe or community,

n_i = the number of returned surveys in each tribe or community, and

S_i = the number of SHARCs issued for tribe or community.

There were 5 exceptions. As discussed above, in 2005, 527 SHARCs were held by members of the Native Village of Toksook Bay, most of whom do not fish for halibut. Expanding the reported harvest based on in-person interviews and mailed survey returns (154 returns, or 29% of all SHARCs issued) would result in a large overestimate of the subsistence halibut harvest for the community. Therefore, the reported harvest is the estimated harvest for Toksook Bay.

Second, as discussed above, CBSFA staff in St. Paul divided the list of SHARC holders for that community into two strata: potential halibut fishers (either subsistence or commercial) (98 SHARC holders) and others (131 SHARC holders). All non-respondents to the mailed survey in the second category were classified as "staff administered surveys, did not fish." Of the potential fisher category, 47 of 98 surveys were returned. Survey results for respondents in this stratum were used to estimate harvests for the 51 non-respondents in this strata. This represents the harvest estimate for St. Paul.

Third, 230 SHARCs were held by eligible tribal members living outside of Alaska. Only 40% of the mailed surveys were returned from this group, and none of these returned surveys indicated any subsistence fishing activity. Rather than assign the mean value for their tribe (which would

likely result in an overestimate of the harvest), all non-returned surveys for SHARC holders with out-of-state addresses were coded as “did not fish.”

Fourth, because of a very low response rate (1 of 8 SHARC holders), an expanded harvest estimate was not calculated for the Village of Kanatak. The reported harvests by the single respondent serve as the harvest estimate for this tribe.

Fifth, rural community SHARC holders were divided into 2 categories based upon the expiration date of their SHARC. SHARCs having an expiration date falling within the study period and that were not renewed were treated as separate strata from other SHARCs for the purpose of generating harvest estimates. This was done to account for potential bias and resulting overestimation of harvest for SHARCs that only fished for part of the year. During 2005, 1,854 rural community SHARCs expired; of those 795 (43%) participated in the survey.

It should also be noted that not every individual who obtained a SHARC as a tribal member resided in the community where his or her tribe’s headquarters is located. Therefore, the sum of harvest estimates for tribal SHARC holders and rural resident SHARC holders does not necessarily equal the halibut harvest for particular communities. Rather, an additional analysis was necessary to estimate harvests by community of residence that assigned tribal SHARC holders to a community based on their mailing addresses. Appendix Tables A-4, A-5, and A-6 report study results by place of residence of the SHARC holders.

The standard deviation (SD) (or Variance [V], which is the SD squared) of the harvest was calculated with the raw, unexpanded data. The Standard Error (SE), or SD of the mean, was also calculated for each community or tribe. This was used to calculate the *relative precision of the mean*, or the likelihood an unknown value falls within a certain distance from the mean. In this study, the relative precision of the mean is shown in the tables as a confidence interval (CI), expressed as a percent. Once the standard error was calculated, the CI was determined by multiplying the SE by a constant that reflected the level of significance desired, based on a normal distribution. The constant for 95 percent confidence intervals is 1.96. Though there are numerous ways to express the formula below, it contains the components of a SD, V, and SE.

Relative Precision of the Mean (CI%):

$$C.I.\%(\pm) = \frac{t_{\alpha/2} \times \frac{s}{\sqrt{n}} \times \sqrt{\frac{N-n}{N-1}}}{\bar{x}}$$

Where $s = \sqrt{\frac{\sum_{i=1}^I \sum (x - \bar{x}_i)^2}{n_i - 1}}$ (Sample standard deviation)

s = sample standard deviation

n = total sample size

N = total population size

n_i = tribal or community sample size

N_i = tribal or community population size

$t_{\alpha/2}$ = Student's *t* statistic for alpha level ($\alpha=.95$) with $n-1$ degrees of freedom.

Project staff explored the possibility of non-response bias for returned mail out surveys and its effect on harvest estimates. However, it was determined that responses to the survey, including harvest levels and involvement in the fishery, were not significantly different between any of the response categories (responses to the first mail out, the second mailout, the third mailout, and staff administered surveys) (see Appendix Table A-2).

As noted above, survey respondents provided harvest estimates in pounds round (whole, live) weight. For ease of comparison with estimates of halibut removals in other fisheries, we have converted these estimates to pounds net (dressed, head off) weight, where (0.75) (round weight) = net weight.⁷

Supplemental Mailing and In-Season Study

In 2005, the grant agreement between ADF&G and NMFS was amended to add funds to support a supplemental survey mailing to 1,108 SHARC holders in Sitka and Kodiak who had responded to the mailed survey in 2005 and had reported fishing for halibut in 2004. The primary goal of the supplemental mailing was to collect additional background information about subsistence halibut fishing that was necessary to design an in-season harvest assessment program for 2006. Respondents were asked to indicate the months in which they fished for halibut in 2004 and their harvests in each month; name the locations at which they landed (brought to shore) halibut in 2004; explain how they distinguished between sport fishing and subsistence fishing for halibut; and evaluate their understanding of the subsistence halibut regulations. Survey findings are reported in Appendix I. Chapter 2 includes a short discussion of reasons provided by supplemental survey respondents for distinguishing between subsistence and sport-caught halibut.

The grant agreement between ADF&G and NMFS was also amended to fund an in-season harvest monitoring program for the subsistence halibut fisheries in Sitka and Kodiak in 2006. This study was implemented in May 2006. Findings will be reported in the final report for the 2006 study year.

Products

The public review draft of this final report was completed in November 2006 and circulated for review and comments. A presentation of the study findings and recommendations took place at the December 2006 meetings of the ANSHWG and the NPFMC in Anchorage, Alaska. The final report was revised in consideration of comments and suggestions received from reviewers

⁷ The factor of 0.75 for converting halibut round weight to net weight is the standard used by the International Pacific Halibut Commission and the Division of Sport Fish of ADF&G. Division of Subsistence studies, as reported in the Technical Paper Series and the Community Profile Database (Scott et. al 2001), generally use a factor of .72 for converting halibut round weights to net weights, based on Crapo et al (1993:7), who report that on average, the weight of a dressed halibut with the head removed is 72 percent of the round weight, with a range of 68 percent to 80 percent. In Division reports, "net" weight (dressed, head off) is usually referred to as "usable weight."

of the public review draft and those received during the NPFMC and ANSHWG meetings. In addition to the final report, a short findings summary was prepared (Appendix J). The summary was sent to tribal government representatives and other interested individuals and groups. This report and the project summary were posted on the Division of Subsistence web site and the RAM website in PDF format for downloading and printing by the public.

CHAPTER 2: FINDINGS

SUBSISTENCE HALIBUT HARVESTS IN 2005

Estimated Number of Subsistence Halibut Fishers

Of the 14,306 individuals who were holders of SHARCs in 2005 (obtained in either 2003, 2004, or 2005), an estimated 5,621 (39%) subsistence fished for halibut in 2005 (Table 4, Fig. 6). Of the 6,437 individuals who had obtained SHARCs as members of an eligible tribe, an estimated 2,035 subsistence fished for halibut (32%). Of the 7,869 individuals who had obtained SHARCs as residents of qualifying rural communities, an estimated 3,349 (43%) subsistence fished for halibut in 2005. In 2004, 5,984 of 13,813 SHARC holders subsistence fished for halibut (43%), including 2,157 of 6,533 tribal SHARC holders (33%) and 3,827 of 7,280 non-tribal rural SHARC holders (53%). In 2003, 4,924 of 11,635 SHARC holders subsistence fished for halibut (42%), including 1,836 of 5,578 tribal SHARC holders (33%) and 3,106 of 6,057 non-tribal rural SHARC holders (51%) (Fig. 6).

In 2005, as in 2004 and 2003, demography may account for the difference in the rate of participation in the subsistence halibut fishery between tribal SHARC holders and rural SHARC holders. As shown in Table 5 and illustrated in Figure 7, in 2005, 17% of tribal SHARC holders were younger than 20 years of age, compared to 8% of rural SHARC holders. This may reflect a policy on the part of some eligible tribes to register all or most tribal members, including younger people who were less likely to subsistence fish than adults. For example, 527 members of the Native Village of Toksook Bay obtained SHARCs; of these, 42% were younger than 20 years of age (Table 5). Excluding Toksook Bay from the statewide tribal SHARC totals does not substantially alter the contrast in the younger age cohorts between tribal and rural resident SHARC holders (Table 5).

As illustrated in Figure 8 (see also Table 4), the largest number of Alaska subsistence halibut fishers in 2005 were from tribes and rural communities in Regulatory Area 2C (Southeast Alaska), 3,219 (57%). There were 1,657 subsistence halibut fishers (29%) from tribes and communities in Regulatory Area 3A (Southcentral Alaska), 305 (5%) from Regulatory Area 4E (East Bering Sea Coast) tribes and communities, and 237 (4%) from Area 3B (Alaska Peninsula) tribes and communities. Additionally, there were 203 (4%) halibut fishers who were members of tribes and residents of communities in the four other regulatory areas. As also shown in Figure 8, the distribution of subsistence fishers by regulatory area in 2005 was similar to that of 2003 and 2004. Compared to 2004, there was decrease in the estimated number of subsistence halibut fishers in Area 2C in 2005, but the level of participation in 2005 remained slightly above the estimate for 2003. The number of fishers remained about the same in Area 3A in 2005 compared to 2004, but remained higher than the 2003 estimate.

Alaska Native tribes with the most subsistence halibut fishers in 2005 included the Central Council of Tlingit and Haida Indians (173 subsistence halibut fishers), the Ketchikan Indian Corporation (167), the Sitka Tribe of Alaska (148), the Metlakatla Indian Community (102), the Qagan Toyagungin Tribe of Sand Point Village (79), the Shoonaq' Tribe of Kodiak (85), the Hoonah Indian Association (69), the Angoon Community Association (66), and the Hydaburg

Cooperative Association (65). Of the SHARC holders who registered as residents of eligible rural communities, the most subsistence fishers lived in Kodiak (777), followed by Sitka (654), Petersburg (399), Cordova (245), Haines (226), Wrangell (184), and Craig (165). Appendix Table A-3 provides details for each tribe and community regarding participation in the subsistence fishery and subsistence halibut harvests in 2005.

As noted above, not every tribal SHARC holder lives in his or her tribe's headquarters community. After assigning tribal members to a community based on their place of residence, an estimate of participation in the subsistence halibut fishery in 2005 by community can be obtained. Appendix Table A-4 provides study findings based on place of residence. Communities with 100 or more resident SHARC holders who participated in the subsistence halibut fishery in 2005 were Kodiak (871), Sitka (814), Petersburg (436), Cordova (281), Haines (247), Craig (231), Wrangell (228), Ketchikan (224), Hoonah (126), Metlakatla (120), Klawock (114), Juneau (102) and Sand Point (100). Of the 14 Alaska communities with the most subsistence halibut fishers in 2005, most had about the same or fewer fishers than in 2004. Compared to 2003, estimated participation in the fishery was higher in Cordova, Kodiak, and Sand Point in 2004, but this growth moderated in 2005 in all 3 places (Fig. 9). (See Chapter Three for further discussion of Cordova, Kodiak, and Sand Point as case study communities.) No non-Alaska resident tribal SHARC holders subsistence-fished for halibut in Alaska in 2005, compared to 24 in 2004 and 5 in 2003.

Estimated Alaska Subsistence Halibut Harvests in 2005 by SHARC Type and Regulatory Area

Table 4 reports estimated Alaska subsistence halibut harvests for 2005 by SHARC type, regulatory area, and gear type. The total estimated subsistence halibut harvest in Alaska in 2005 was 55,875 fish (+/- 3%) for 1,178,222 pounds (+/- 3%) net weight.⁸ As estimated in pounds net weight, 51% of the subsistence halibut harvest (600,155 pounds [+/- 4%]) was taken by fishers registered with tribes or rural communities in Regulatory Area 2C (Fig. 10). (Note that because some SHARC holders may fish in a regulatory area different from the location of their tribal headquarters or rural community of registration, the area totals in Table 4 do not precisely represent harvest locations. See the section on harvests by location, below.) Fishers from Area 3A tribes and rural communities harvested 424,352 pounds (+/- 5%) (36% of the state total). Harvests totaled 50,656 pounds (+/- 19%) (4%) for communities and tribes of Regulatory Area 3B. For Regulatory Area 4E,⁹ the estimated harvest for tribal and rural SHARC holders was 50,488 pounds (+/- 9%) (4%). For tribal and rural SHARC holders in Area 4A, the estimated harvest was 35,185 pounds (+/- 21%) (3%). Tribes and communities in the remaining three regulatory areas (4B, 4C, and 4D) harvested 17,387 pounds (about 1%).

⁸ This approximates 1,590,882 pounds round (live or whole) weight. See footnote 5 for an explanation of the factor used to convert round weight to net weight (net weight = 75% of round weight).

⁹ Community Development Quota (CDQ) organizations operating exclusively in Areas 4D and 4E may retain sublegal halibut (less than 32 inches) from their commercial catches for home use. In 2005, a total of 23,221 pounds net weight of halibut was retained by 3 organizations: Coastal Villages Regional Fund (11,335 pounds), Bristol Bay Economic Development Corporation (8,750 pounds), and Norton Sound Economic Development Corporation (3,136 pounds) (Gilroy pers. comm. 11/9/06). The IPHC includes these fish within the "personal use" removal category, a category that also includes subsistence harvests (Gilroy 2005:64). See also the section in Chapter 3, "Comparisons with Non-Subsistence Harvests."

The estimated subsistence harvest of 1,178,222 pounds of halibut in 2005 represents a slight decrease of 1.3% compared the estimated harvest of 1,193,161 pounds in 2004 (Fig. 11). Harvests by tribal SHARC holders increased by 1.5%, from 489,446 pounds in 2004 to 496,792 pounds in 2005. Tribal SHARC holders harvested 42% of the Alaska subsistence halibut harvest in 2005, compared to 41% in 2004. Subsistence halibut harvests by non-tribal, rural resident SHARC holders decreased by 3.2%, from 703,715 pounds in 2004 to 681,430 pounds in 2005. This group accounted for 58% of the statewide subsistence halibut harvests in 2005, compared to 59% in 2004.

Members of 74 Alaska tribes harvested subsistence halibut in 2005. In 21 others, tribal members obtained SHARCs, but no one fished. No one in the remaining 25 eligible tribes held a valid SHARC in 2005. Most of these tribes (24) were in Regulatory Area 4E (East Bering Sea Coast). As shown in Figure 12, members of the 16 tribes with harvests of 10,000 pounds or more accounted for 67% of the total subsistence halibut harvest by tribal SHARC holders in 2005. These 16 tribes accounted for 63% of the tribal SHARCs (4,069 of 6,437). Members of the other 58 tribes with harvests accounted for about 33% of the total harvest by tribal members.

Residents of 70 eligible rural communities harvested subsistence halibut in 2005.¹⁰ In 2 others, SHARC holders fished unsuccessfully. In 19 others, individuals obtained SHARCs but no one fished. No one in the remaining 26 eligible rural communities held a valid SHARC as a non-tribal member in 2005. Most of these communities (24) were in Regulatory Area 4E (East Bering Sea Coast).¹¹ As shown in Figure 13, 13 rural communities with harvests of over 10,000 pounds accounted for 83% of the subsistence halibut harvest by the holders of rural (non-tribal) SHARCs in 2005. These communities accounted for 85% of the rural SHARCs. Residents of the other 57 communities with harvests accounted for 17% of the total harvest by rural SHARC holders.

As also shown in Figure 13, rural SHARC holders from 2 communities accounted for 44% percent the total harvest by this group: Kodiak (27%) and Sitka (17%). Adding Petersburg, the next highest rural community harvest at 8%, the top 3 rural communities accounted for over half (52%) of the rural community (non-tribal) subsistence halibut harvest in Alaska in 2005.

Estimated Alaska Subsistence Halibut Harvests in 2005 by Harvest Location

Survey respondents were asked to report the “water body, bay, or sound [that they] usually fished” for subsistence halibut in 2005. Multiple responses were permitted. In Table 6, estimated subsistence halibut harvests are reported for the 8 Alaska halibut regulatory areas and 21 subdivisions within these areas. It should be noted that regulatory area totals in Table 6 differ slightly from those reported in Table 4 because not all SHARC holders fished within the regulatory area in which their tribal headquarters or residence is located.

Subsistence halibut harvests in Regulatory Area 2C (Southeast Alaska) accounted for 51% of the Alaska subsistence halibut harvest in 2005 (598,072 pounds net weight) (Fig. 14). Also, 3 of the 4 geographic subareas with the largest subsistence halibut harvests in 2005 were in Area 2C:

¹⁰ In this tally, Chiniak, listed separately in tables in this report, is counted as part of Kodiak, as it is for eligibility.

¹¹ Note that residents of these communities may have obtained SHARCs as tribal members.

southern Southeast Alaska (328,658 pounds net weight; 28% of the state total); northern Southeast Alaska other than the Sitka Local Area Management Plan (LAMP) area (135,869 pounds; 12%); and the Sitka LAMP area (133,545 pounds; 11%), as shown in Figure 15 and Figure 16. Regulatory Area 3A (Southcentral Alaska) ranked second, with 36% of the state's total subsistence halibut harvest (429,275 pounds net weight). Waters bordering the Kodiak Island road system (including Chiniak Bay) ranked third among subareas, with a subsistence halibut harvest of 134,849 pounds (11% of the state total), followed by the remainder of the Kodiak Island area, which ranked fifth (110,824 pounds; 9%). Harvests within Cook Inlet waters of Area 3A accounted for 7% of the state total (79,024 pounds), those within Prince William Sound added 68,063 pounds (6% of the statewide total), and the Yakutat Area added 36,515 pounds (3%). Among regulatory areas, Area 4E (Bering Sea Coast) ranked third with 5% (54,119 pounds). Combined, Bristol Bay and the Yukon/Kuskokwim Delta areas with Area 4E accounted for all of this area's harvest, with no reported harvests from Norton Sound. Area 3B (Alaska Peninsula including the Chignik Area) ranked fourth with 4% of the Alaska total (46,225 pounds). In descending order, subsistence halibut harvests in the other regulatory areas in 2005 were as follows: Area 4A (eastern Aleutian Islands), 35,615 pounds (3%); Area 4C (Pribilof Islands), 7,716 pounds (1%); Area 4D (St. Lawrence Island), 5,848 pounds (less than 1%); and Area 4B the western Aleutian Islands, 1,351 pounds (less than 1%).

Figure 17 reports estimated harvests in pounds net weight by location fished at the regulatory area level in 2003, 2004, and 2005. Table 7 compares estimated subsistence halibut harvests by regulatory area and geographic area in 2005 with those estimated for 2004 and 2003. As noted previously, for the state overall, the estimated harvest in pounds decreased by 1.3% in 2005 from 2004 (Fig. 18). However, the estimated harvest in 2005 was about 13% higher than the estimate for 2003 (Fig. 19).

Estimated subsistence halibut harvests increased in 5 regulatory areas in 2005 compared to 2004 (Fig. 18). The largest proportional increase was in Area 4E (East Bering Sea Coast), where estimated harvests increased 90%, from 28,501 pounds to 54,119 pounds. However, the 2005 harvest in this area was approximately the same as the estimate for 2003 (53,775 pounds). More thorough harvest reporting in several western Alaska communities may account for the change in harvest estimates from 2004 to 2005. For Area 4B (Western Aleutian Islands), the 2005 harvest estimate of 1,351 pounds was 48% higher than 2004 (916 pounds) but still 48% lower than the 2,582 pounds estimated for 2003 (Fig. 19). Estimated harvests in Area 4A (Eastern Aleutian Islands) grew by 23% in 2005 (35,615 pounds) over 2004 (28,877 pounds), and were 68% above the estimate for 2003 (21,197 pounds). There was a similar pattern for Area 3B (Alaska Peninsula), where 2005 subsistence halibut harvests (46,225 pounds) were 38% higher than the estimate for 2004 (33,519 pounds) and 68% higher than 2003 (27,477 pounds).

In terms of total pounds, the largest increases in estimated harvests over the 3 years of the project have taken place in Area 3A (Southcentral Alaska), where the 2005 harvest of 429,275 pounds was 6% higher than the estimate for 2004 (403,610 pounds) and 50% higher than the estimate for 2003 (285,500 pounds). As a consequence, Area 3A accounted for 36% of the statewide subsistence halibut harvest in 2005 compared to 34% in 2004 and 27% in 2003 (Table 7). In Area 3A, the greatest changes in subsistence halibut harvests from 2004 to 2005 took place in the Yakutat area (81% increase), Prince William Sound (17% increase), and the Kodiak Road

System (4% increase). Compared to 2003, harvests in these 3 subareas have increased 226%, 140%, and 18%, respectively. Increases in the number of SHARCs issued to Cordova residents and more participation in the fishery by Kodiak residents account for much of the increased harvest in Prince William Sound and the Kodiak area. While estimated harvests in the Cook Inlet subarea declined by 6% in 2005 compared to 2004, the 2005 harvest remained about 50% above the estimated harvest for 2003.

Estimated subsistence halibut harvests in other 3 regulatory areas were lower in 2005 compared to 2004 (Table 7, Fig. 18). Harvests dropped by 47% in Area 4D (Central Bering Sea) (from 10,923 pounds in 2004 to 5,848 pounds in 2005), but remained 34% higher than 2003 (4,380 pounds). The 2005 harvest estimate of 7,716 pounds of subsistence halibut for Area 4C (Pribilof Islands) continued a downward trend; 2005 was 21% below the 2004 estimate (9,734 pounds) and 66% below the 2003 estimate (22,881 pounds). As noted in the report for the 2004 study year (Fall et al. 2005:15), an improved response rate to the survey is likely resulting in better harvest estimates for St. Paul, the largest community in Area 4C.

As in the first two years of the project, Area 2C (Southeast Alaska) accounted for the most subsistence halibut harvests in 2005 (598,072), but this harvest represents a decrease of 12% compared to 2004 and 4% compared to 2003. The percentage of the total statewide subsistence halibut harvest that took place in Area 2C in 2005 declined to 51% compared to 57% in 2004 and 60% in 2003. Harvests decreased in all 3 subareas within Area 2C in 2005 compared to 2004, ranging from a 9% decrease in the Sitka LAMP area to a decrease of 11% in southern southeast Alaska and an 15% decrease in the portion of northern southeast outside the LAMP. The reasons for these changes in Area 2C are likely complex and beyond the scope of this report.¹²

Figure 20 illustrates the average subsistence halibut harvest in pounds net weight for those SHARC holders who subsistence fished in 2005. Figure 21 illustrates the average harvest per fisher in number of halibut. For the state overall, the average subsistence halibut fisher harvested 210 pounds net weight or about 9.9 halibut in 2005. Average harvests per fisher at the regulatory area level ranged from 170 pounds net weight in Area 4B to 359 pounds per fisher in Area 4D. In 2003, subsistence fishers on average harvested 8.9 halibut (211 pounds) (Fall et al. 2004:12-13), and in 2004 the average harvests were 8.8 halibut and 199 pounds (Fall et al. 2005:15).

Subsistence Halibut Harvests by Place of Residence

As shown in Figure 22, there were 35 Alaska communities whose residents had combined estimated subsistence halibut harvests of more than 7,500 pounds net weight (over 10,000 pounds round weight) in 2005. In this figure, community totals include harvests of all SHARC holders living in the community, regardless of type of SHARC (tribal or rural) or tribal

¹² Further discussion of differences between harvest estimates for 2003, 2004, and 2005 appears in Chapter 3 and Chapter 4. However, more thorough discussion of harvest trends in the Alaska subsistence halibut fishery should await availability of data for 2006, the fourth year of harvests under the new regulations.

affiliation.¹³ Residents of these communities accounted for 89% of the total Alaska subsistence halibut harvest in 2005. Residents of Kodiak (Kodiak includes Kodiak city and other portions of the Kodiak Island Borough connected to it by roads) ranked first with 18% of the total Alaska harvest, and Sitka ranked second with 12%. With 12,816 and 8,947 residents, respectively, these two communities included about 27% of the population of rural communities eligible to participate in the subsistence fishery. There were 66 other Alaska communities with at least one resident who participated in the subsistence halibut fishery in 2005. The total harvest for these other communities represented 11% of the state total.

For 2005, 230 SHARC holders provided out of state addresses from 162 communities in 36 states and territories.¹⁴ Seattle was the non-Alaska community with the most SHARC holders, with 17. No non-Alaska resident SHARC holders subsistence fished for halibut in 2005 (see Appendix Table A-4). In 2004, 24 non-Alaska residents reported subsistence fishing for halibut in Alaska, with an estimated total harvest of 169 fish and 4,845 pounds net weight (about 0.4% of state total). In 2003, 5 non-Alaska residents participated in the Alaska subsistence halibut fishery, harvesting 5 fish.

Subsistence Harvests by Gear Type

Table 6 reports the estimated subsistence harvests of halibut in Alaska in 2005 by gear type and regulatory area fished. In total, 824,006 pounds (70%) of halibut (net weight) were harvested using setline (stationary) gear (longlines or skates) and 354,216 pounds (30%) were harvested using handlines or lines attached to a rod or pole (hand-operated gear). There were notable differences between regulatory areas (Table 6, Fig. 23). Harvests using setline gear predominated in Area 4D (Central Bering Sea) (99% of the total subsistence harvest), 2C (Southeast Alaska) (81%), 3A (Southcentral Alaska) (67%), 4B (Alaska Peninsula) (74%), and 4C (Pribilof Islands) (56%). In contrast, hand-operated gear accounted for most of the subsistence halibut harvests in Area 4E (East Bering Sea Coast) (87%), 4A (Eastern Aleutian Islands) (68%), and 3B (Alaska Peninsula) (52%). In 2004, 74% of the Alaska subsistence halibut harvest was taken with setline gear and 26% with hand operated gear (Fall et al. 2005:16). In 2003, 72% was taken with setline gear and 28% with hand operated gear (Fall et al. 2004:13).

Number of Hooks Fished with Setline Gear

Respondents who fished with setline (stationary) gear (longline or skate) were asked to report how many hooks they “usually set.” The findings by regulatory area are reported in Table 8. For the fishery overall, most setline fishers (42%) used 30 hooks, the maximum number allowed by regulation in Areas 2C, 3A, 3B, 4A, and 4B (there is no hook limit in Areas 4C, 4D, and 4E) (Fig. 23). The next most frequently reported number was 20 hooks, usually used by 20% of the fishers who used setline gear. Twenty-five hooks (8%) ranked third, followed by 10 hooks (8%) and 15 hooks (7%). This pattern is similar to that recorded for 2004, when 44% of setline fishers

¹³ Note that nonrural places, such as Anchorage, Juneau, Ketchikan, and Valdez, appear in Figure 22 and in Appendix Tables A-4, A-5, and A-6, because members of eligible Alaska Native tribes may participate in the fishery regardless of where they live.

¹⁴ Note that members of eligible tribes may obtain SHARCs regardless of their place of residence.

used 30 hooks and 19% percent used 20 hooks (Fall et al. 2005:16), and 2003, when 43% of setline fishers used 30 hooks and 20% used 20 hooks (Fall et al. 2004:13).

Thirty was the most frequently used number of hooks with setline gear in 6 of the 8 regulatory areas (Table 8): 2C (Southeast Alaska), 43%; 3B (Alaska Peninsula), 37%; 4A (Eastern Aleutian Islands), 37%; 3A (Southcentral Alaska), 40%; 4E (East Bering Sea Coast), 62%; and Area 4C (Pribilof Islands), 72%. In Area 4B (Western Aleutians), 47% of fishers who used set hook gear used one hook and 27% used 30 hooks. In Area 4D (Central Bering Sea), 50% used 20 hooks, followed by 25 hooks (25%) and 15 hooks (25%).

Sport Harvests of Halibut by SHARC Holders

Survey respondents were asked to report the number of halibut and pounds of halibut they harvested “while sport fishing during 2005.” They were instructed not to include fish they included as part of their subsistence harvests as sport caught. The goal of this question was to avoid double-counting harvested halibut in this survey and in the statewide survey of sport fishers administered by ADF&G’s Division of Sport Fish. Answering this question required respondents to classify their hand-operated gear (hook and line, and rod and reel) harvests as either subsistence or sport; these gear types are legal gear for both sport fishing and subsistence fishing. Fish reported in the survey as “sport harvests” are not included in the estimated subsistence harvests discussed above. If SHARC holders also received the sport fish survey for 2005, they would be expected to report the same number of halibut as sport-caught as in their response in the SHARC survey and not include any halibut they reported as subsistence harvests, even if taken with rod and reel or handheld line with two or less hooks. Note that the study findings do not represent the total recreational halibut harvest by residents of eligible communities and tribes in 2005, because individuals from these tribes and communities who did not obtain SHARCs could have sport fished.

As shown in Table 4, the estimated total sport halibut harvest by holders of SHARCs in 2005 was 14,096 fish and 293,415 pounds net weight. Of the total harvest, most was taken by SHARC holders from Area 2C (Southeast Alaska) (153,920 pounds; 52%) and Area 3A (southcentral Alaska) (124,608 pounds; 42%). By area fished, most of the sport halibut harvest by SHARC holders occurred in Area 2C (149,402 pounds; 51%) and Area 3A (133,276 pounds; 45%) (Table 6). In total, an estimated 3,147 SHARC holders (22%) reported that they sport fished for halibut in 2005. A very large majority of these fishers fished in either Area 2C (1,827; 58%) or Area 3A (1,236; 39%) (Table 6). (See Appendix Table A-7 for estimated sport halibut harvests by tribe and non-tribal rural community SHARC holders.)

The mail-out survey did not investigate the criteria by which survey respondents classified their rod and reel (hook and line attached to a rod or pole) halibut harvests as subsistence or sport. However, a supplemental mailing to 1,098 SHARC holders from Kodiak and Sitka who fished for halibut in 2004 (see Chapter 1) asked respondents to provide reasons for classifying their halibut harvests as sport or subsistence. The primary factor (for 69% of respondents) was the gear used to harvest the fish: respondents viewed rod and reel as “sport gear” and setline gear as “subsistence gear.” (See Table 4 and Figure C in Appendix I.) Another factor, reported by 12%, concerned the composition of the fishing group. If the SHARC holders had fished with relatives

or friends who did not possess a SHARC, they classified their fishing as recreational. Harvest amounts were also a consideration: harvests of one or two halibut with a rod and reel were considered “sport” by some respondents, but if they harvested more than 2 fish with rod and reel in one day, they classified the harvest as subsistence.

Finally, about 19% of the respondents gave reasons related to the use of the fish or cultural and lifestyle explanations. Many in this group said that because they fished for food and because halibut fishing was part of their cultural tradition, all of their fishing was subsistence fishing. Also, respondents to the mail survey for 2005 who did not have a SHARC for all of the study year may have classified prior rod and reel harvests as recreational. (See Appendix I for more findings from the supplemental mailing.) Further, most tribal SHARC holders who live in nonrural places are required by the regulations to subsistence fish for halibut only “in his or her area of tribal membership” (50 CFR 300.65(g)(4)(ii)). Tribal members who halibut fished in other locations (for example, a SHARC holder who is a member of the Sitka Tribe living in Anchorage and halibut fishing in Cook Inlet) would need to abide by sport fishing regulations and report any harvests from these locations as sport-caught on the SHARC survey.

Average Net Weights of Subsistence and Sport-Caught Halibut

Table 9 reports the average net weight of subsistence and sport-caught halibut by SHARC holders in 2005. For the state, the average net weight of subsistence caught halibut was 21.1 pounds and the average net weight of sport-harvested halibut by SHARC holders was 20.8 pounds. For all halibut harvested by SHARC holders in 2005, the average net weight per harvested halibut was 21.0 pounds. Between regulatory areas, there was range of average weights per halibut. The halibut harvested by the communities of Area 4D (Saint Lawrence Island), averaged 54.7 pounds net weight per fish, more than double the statewide average. In Area 4E, halibut averaged 14.4 pounds net weight, about two-thirds of the statewide average. In 2004, the statewide average for subsistence-harvested halibut was estimated at 22.8 pounds, the average sport-harvested halibut by SHARC holders was 20.0 pounds, and the average for all halibut was 22.2 pounds (Fall et al. 2005:17). In 2003, the statewide average for subsistence-harvested halibut was 23.7 pounds, the average sport-harvested halibut by SHARC holders was 22.8 pounds, and the average for all halibut was 23.5 pounds (Fall et al. 2004:14).

ROCKFISH HARVESTS

Survey respondents were asked to estimate the number of rockfish they harvested while subsistence fishing for halibut in 2005. Harvest data at the species level were not collected as part of this survey.

Note that these survey results do not represent an estimate for the total subsistence rockfish harvest by SHARC holders in 2005 because they might have harvested rockfish while fishing for species other than halibut, and other fishers in the communities who did not obtain SHARCs might have harvested rockfish. The Division of Subsistence Community Subsistence Information System (CSIS) (ADF&G 2006)¹⁵ includes estimates of rockfish harvests for communities in which comprehensive household surveys have been administered.

¹⁵ This was formerly the Community Profile Database (Scott et al. 2001).

It should also be noted that the label “bycatch” for these harvests is misleading.¹⁶ Rockfish are used for subsistence purposes in rural communities throughout their range in Alaska (ADF&G 2006). It is highly likely that rockfish harvested incidentally in the subsistence halibut fishery are utilized as a subsistence food. It is highly unlikely that many incidentally caught rockfish are discarded in this subsistence fishery.

As shown in Table 10, the statewide estimated rockfish incidental harvest in the subsistence halibut fishery in 2005 was 12,395 fish by 1,544 fishers (11% of all SHARC holders, and 27% of all SHARC holders who subsistence fished for halibut in 2005). This is an average of about 2.2 rockfish per fisher for all subsistence halibut fishers and about 8.0 rockfish per fisher for those who had a rockfish harvest. Most of the subsistence halibut fishers who caught rockfish fished in Area 2C (Southeast Alaska) (1,047 fishers; 68%) and Area 3A (426 fishers; 28%). In Area 2C, about 32% of subsistence halibut fishers incidentally harvested rockfish, as did 25% in Area 3A (Southcentral Alaska). (See Appendix Table A-7 for estimated rockfish harvests by tribe and by non-tribal rural community SHARC holders.)

As illustrated in Figure 25 and Figure 26, most of the incidental rockfish harvest in 2005 was harvested in Area 2C: 7,764 rockfish, 63% of the statewide total. Area 3A accounted for the second-highest total: 3,638 rockfish, 29% percent of the total. Harvests were relatively small by SHARC holders fishing in other regulatory areas, who combined harvested 993 rockfish, 8% percent of the statewide total. Compared to 2004, when 19,001 rockfish were harvested, the incidental rockfish harvest in the subsistence halibut fishery in 2005 was down by 35%. The 2005 harvest was down by about 17% compared to 2003, when 14,870 rockfish were harvested in the subsistence halibut fishery.

Table 10 also reports the estimated incidental rockfish harvest in 2005 by SHARC holders by location of harvests within geographic subareas. Most of the harvest occurred in southern Southeast Alaska (4,334 fish), the Sitka LAMP area (2,422 rockfish), the Kodiak Island Road System (1,141 rockfish), northern Southeast Alaska (1,009 rockfish), and other Kodiak Island (830 rockfish). Incidental rockfish harvests totaled 792 fish in Prince William Sound and 679 rockfish in Cook Inlet. In Aleutian Islands waters, there was an incidental harvest of 431 rockfish.

LINGCOD HARVESTS

Survey respondents were asked to estimate the number of lingcod they harvested while subsistence fishing for halibut in 2005. Note that these survey results do not provide an estimate

¹⁶ The Magnuson-Stevens Fishery Conservation and Management Act (Section 3) defines “bycatch” as “fish harvested in a fishery, but which are not sold or kept for personal use, and includes economic discards and regulatory discards. Such term does not include fish released alive under a recreational catch and release fishery management program.” Federal regulations (50 CFR 679.2) define bycatch or bycatch species as fish caught and released while targeting another species or caught and released while targeting the same species; under 50 CFR 600.10 discard means to release or return fish to the sea, whether or not such fish are brought fully on board a fishing vessel. In all cases, bycatch means to discard fish and excludes retaining fish for use. The federal definition of “incidental catch” or “incidental species” is “fish caught and retained while targeting on some other species, but does not include discard of fish that were returned to the sea” (50 CFR 679.2).

of the total subsistence lingcod harvest by SHARC holders in 2005 because they might have harvested lingcod while fishing for species other than halibut. Also, other fishers in the communities who did not hold SHARCs might have fished for or harvested lingcod, so that these incidental harvests represent only a portion of the total 2005 subsistence harvest. The Division of Subsistence Community Subsistence Information System (ADF&G 2006) includes estimates of lingcod harvests for communities in which comprehensive household surveys have been administered.

It should also be noted that the label “bycatch” for these harvests might be misleading.¹⁷ Lingcod are used for subsistence purposes throughout their range in rural Alaska (ADF&G 2006). It is highly likely that lingcod harvested incidentally in the subsistence halibut fishery are utilized as a subsistence food. It is very unlikely that many lingcod caught in this subsistence fishery are discarded.

The statewide estimated incidental lingcod harvest in the subsistence halibut fishery in 2005 was 2,355 fish by 862 fishers (Table 10). This is an average of about 0.4 lingcod per fisher for all subsistence halibut fishers and 2.7 lingcod per fisher for those who had a lingcod harvest. Of all SHARC holders who subsistence fished for halibut in 2005, 15% harvested at least one lingcod while halibut fishing. Most of the subsistence halibut fishers who harvested lingcod fished in Area 2C (Southeast Alaska) (568; 66%) and Area 3A (Southcentral Alaska) (268; 31%). (See Appendix Table A-7 for estimated lingcod harvests by tribe and by non-tribal rural community SHARC holders.)

As illustrated in Figure 27 and Figure 28, most of the incidental lingcod were harvested in Area 2C: 1,311 lingcod, 56%. Area 3A fishing locations accounted for the second-highest total: 735 lingcod, 31%. In 2004 and 2003, an estimated 4,407 and 3,298 lingcod, respectively, were harvested in the subsistence halibut fishery. The 2005 estimated harvest represents a decrease of 47% in the incidental lingcod harvest compared to 2004 and a 29% decrease compared to 2003.

Table 10 also reports the incidental harvest of lingcod in 2005 by SHARC holders while they were subsistence fishing for halibut by geographic subarea. Most of this harvest occurred in Area 2C (southeast Alaska): the Sitka LAMP area (642 lingcod), southern Southeast Alaska (545 lingcod), and the remainder of northern Southeast Alaska (123 lingcod). Incidental lingcod harvests totaled 228 fish in the lower Alaska Peninsula area (Area 3B), 200 lingcod in the Yakutat Area, and 204 lingcod in Kodiak Island waters along the road system. Harvests totaled less than 150 lingcod in each of the other geographic subareas.

¹⁷ See footnote 16 for definitions of bycatch and incidental catch.

CHAPTER 3: DISCUSSION

COMPARISONS WITH OTHER HARVEST ESTIMATES

As discussed in the report for the first year of the SHARC survey pertaining to fishing in 2003 (Fall et al. 2004:19-22), comparing the statewide harvest estimate for the Alaska subsistence halibut fishery based on the SHARC survey with estimates for previous years is difficult for several reasons. As noted in Chapter One, regulations that allow subsistence halibut fishing in Alaska waters using traditional gear such as longlines with more than 2 hooks, and that removed the restrictive daily harvest limit of 2 fish, have only been in place since May 2003. Also, 2003, 2004, and 2005 were the first 3 years for which a study was implemented to develop a comprehensive estimate of subsistence halibut harvests in Alaska.

Although the Division of Subsistence of ADF&G has conducted systematic household surveys in many of the rural Alaska communities with traditional uses of halibut, these studies pertain to different harvest years. There are many communities, especially in western Alaska, where such surveys have not been conducted. Division of Subsistence studies have attempted to estimate the total halibut harvest for home use in communities, including harvests conducted under sport fishing rules and harvests removed from commercial fisheries for home use. Typically, these studies collected harvests by gear type, such as rod and reel or "other gear." Therefore, it is not possible to separate the "sport harvest" from the "subsistence harvest" for past harvest years, especially in the larger rural communities with a diverse population.

In contrast, the statewide estimates of subsistence halibut harvests for 2003, 2004, and 2005 based on the SHARC mailout survey include only subsistence harvests by individuals who obtained SHARCs. The estimates do not include total harvests accomplished under sport fishing regulations or halibut removed by commercial fishers for their households' use or for noncommercial sharing. Thus they are only partial estimates of the total harvest of halibut for home use by rural Alaska residents and are not directly comparable to previous estimates from Division of Subsistence studies.

The report for the first year of this study included a detailed discussion of previous efforts to develop an estimate of subsistence halibut harvests at the regional and statewide level. The report suggested that the 2003 SHARC survey estimates were not markedly different from estimates based on Division of Subsistence household survey data as reported in the Community Subsistence Information System (ADF&G 2006). We will not repeat that full discussion here.¹⁸

¹⁸ For example for 2000, the IPHC estimated 439,000 pounds net weight for Alaska "personal use" (noncommercial, non-recreational) harvests (*in Wolfe 2001*). The IPHC estimate is based upon a methodology described by Trumble (1999). The IPHC method assumed that 50% of Alaska Native rod and reel halibut harvests as reported in ADF&G household surveys are "sport" and 50% "personal use," and that 75% of the non-native rod and reel harvests are "sport" and 25% "personal use" (Trumble 1999:62). No justification for these assumptions is provided, and changing these sport to personal use ratios can result in a very different estimate for the "personal use" halibut harvest. In a report to the Alaska Board of Fisheries in May 2001, using the same data source as the IPHC, Wolfe (2001) estimated that the subsistence halibut harvest in Alaska "probably ranges between 400,000 and 1,000,000 pounds (round weight) annually," based on harvest data in the Division of Subsistence Community Profile Database (Scott et al. 2001). This is an estimated harvest of 300,000 to 750,000 pounds net weight. See Fall et al. 2004: 19-21 for discussion of Wolfe's methods. In the original analysis for the subsistence halibut program, the NPFMC

However the report also concluded that because of the limitations associated with the previous subsistence harvest estimates at the statewide level, until a time series is developed based upon the SHARC survey results, discussion of harvest trends in the subsistence halibut fishery will remain speculative. A brief discussion comparing the study findings for 2005 with those for 2004 and 2003 appears in Chapter Four. More detailed comparisons of the findings will appear in the report planned for the fourth year of this study.

COMMUNITY CASE STUDIES

To evaluate the subsistence halibut harvest estimate for 2005, comparisons can be made with previous harvest estimates for particular communities where Division of Subsistence household harvest surveys have been administered. These comparisons are subject to several limitations, including different sampling methods, uncertainty in the separation of subsistence and recreational harvests, and the potential effects of the subsistence regulatory changes beginning in 2003. The following communities were selected as case studies to represent communities of similar size and geographic location. In this evaluation, an emphasis is placed on larger communities, since, as discussed in Chapter 2, a small number of large communities accounted for most of the statewide subsistence halibut harvest in 2003, 2004, and 2005. The quality of the harvest estimates for these places largely determines the reliability of the statewide estimate and the performance of the harvest assessment program. Also, as noted in Chapter 1, not all tribal SHARC holders live in the community where their tribal headquarters is located. The following comparisons are based upon place of residence of the SHARC holder to be consistent with earlier division studies. Table 11 reports selected study findings for the case study communities discussed below for 2003, 2004, and 2005. Appendix Tables A-4, A-5, and A-6 report study results for 2005 for all communities based upon residence of SHARC holders.

Sitka (Regulatory Area 2C)

Sitka had a population of 8,835 people in 2000, 2,178 of whom were Alaska Native (U.S. Census Bureau 2001). In 2005, the estimated population of Sitka was 8,947 (ADLWD 2006). Sitka was the second largest rural community eligible to participate in the subsistence halibut fishery in 2005, and had the most SHARCs issued, 1,974 (about 14% of the Alaska total). Of these, 1,578 were issued to non-tribal residents of Sitka, and 396 to tribal members. Members of the Sitka Tribe of Alaska (STA) obtained 436 SHARCs; some STA members live in communities other than Sitka. Members of other Alaska tribes also live in Sitka. Developing a reliable subsistence halibut harvest estimate for Sitka is essential for the success of the subsistence harvest assessment program. It is important to note that Sitka residents' response rates to the survey have been high in the 3 years of the project: 75% in 2003, 72% in 2004, and 68% in 2005.

Based on Division of Subsistence research, there are 2 estimates of halibut harvests for home use for Sitka prior to the authorization of subsistence halibut fishing by the NPFMC in May 2003 (Table 12). For 1987, the estimated total halibut harvest was 193,335 pounds (+/- 22%) (net weight); or 180,982 pounds if fish removed from commercial harvests are deleted. This noncommercial total only includes harvests reported by surveyed persons as taken with rod and

estimated the Alaska subsistence halibut harvest at 1.5 million pounds net weight (68 FR 18145, April 15, 2003, EA/RIR (NMFS 2003).

reel; data on any harvests using “other methods” such as longlines (not then allowed in the subsistence fishery) were not collected. An estimated 1,252 Sitka households had at least one member who fished for halibut in 1987. For 1996, the total estimated harvest was 165,772 pounds net weight (+/- 28%), 149,244 pounds with commercial removals deleted. In 1996, an estimated 943 Sitka households had at least one member who fished for halibut.

For 2005, the estimated subsistence harvest of halibut by tribal SHARC holders who live in Sitka (most, but not all, of whom are members of the STA) and other residents of Sitka (1,974 SHARC holders) was 146,319 pounds net weight (6,062 fish). This was the second highest of any community (Kodiak ranked first), and accounted for 12% of the statewide total subsistence halibut harvest. Of Sitka’s total subsistence halibut harvest, 126,426 pounds (86%) was taken with setline gear, and 19,893 pounds (14%) was taken with hand-operated gear. Adding sport harvests by Sitka SHARC holders (55,913 pounds) increases the estimate to 202,232 pounds net weight. Eight hundred fourteen SHARC holders from Sitka subsistence fished for halibut in 2005. Of these, 738 used setline gear and 172 used hand-operated gear. Also, 417 SHARC holders from Sitka sport-fished for halibut in 2005. The total number of SHARC holders living in Sitka who fished for halibut in either the subsistence or recreational fishery in 2005 was 987 (Table 11).

Estimated subsistence and sport halibut harvests by Sitka SHARC holders in 2005 were similar to estimates for 2003 and 2004 (Table 11). A total of 1,639 Sitka residents had SHARCs in 2003 and as did 1,871 in 2004. Subsistence harvests were 174,880 pounds net weight in 2003 compared to 166,474 pounds in 2004 (a decline of 5%) and 146,319 pounds in 2005 (a decline of 16%). The decline was less in terms of number of halibut harvested: 6,621 in 2003, 6,583 in 2004, and 6,062 in 2005. Adding sport harvests of halibut by SHARC holders to subsistence harvest totals results in very similar harvest estimates for Sitka for the 3 years of the study: 207,288 pounds for 2003, 192,303 pounds in 2004, and 202,232 pounds for 2005. Less Sitka residents participated in the subsistence halibut fishery in 2005 (814) compared to 2004 (904 SHARC holders) or 2003 (821 SHARC holders); 987 participated in either subsistence or sport fishing for halibut in 2005 compared to 956 SHARC holders in 2003 and 1,026 SHARC holders in 2004.¹⁹

In summary, this comparison of harvest estimates from face-to-face comprehensive household surveys and the SHARC survey, although it has limitations because of the different survey and sampling methods used, suggests that the 2003, 2004, and 2005 subsistence halibut harvest estimates for Sitka based on the SHARC survey returns appear reasonable. They are generally in line with the anonymous, face-to-face household surveys results from 1987 and 1996.

¹⁹ Following a recommendation from the first study year (Fall et al. 2004:31), data from the Division of Sport Fish, ADF&G, Sport Fishing Statewide Household Survey (SWHS) about sport halibut harvests by Sitka residents were analyzed for additional background on halibut fishing in the community and discussed in the report for the 2004 study year (Fall et al. 2005:23-24). An updated analysis was not prepared for this report, but will appear in the report planned for the 2006 study year.

Petersburg (Regulatory Area 2C)

In 2000, Petersburg had population of 3,224, including 388 Alaska Natives (U.S. Census Bureau 2001). In 2005, the estimated population had dropped to 3,155 (ADLWD 2006). Before the authorization of subsistence halibut fishing under federal regulations in May 2003, there were two estimates for halibut harvests by Petersburg residents based on household surveys conducted by the Division of Subsistence of ADF&G, pertaining to 1987 and 2000 (Table 13). In the 1987 study, a random sample of 49 of the 1,123 households in Petersburg were interviewed (4%). In that year, Petersburg residents harvested an estimated 119,176 pounds of halibut (net weight) (+/-51%); of this, 11,723 pounds were removed from commercial harvests, giving a noncommercial harvest of 107,448 pounds. As with Sitka, the 1987 study in Petersburg only collected noncommercial harvest data for halibut taken with rod and reel. Of the 1,123 households in Petersburg, 54% had at least one member that fished for halibut noncommercially, for a minimum of 604 halibut fishers in the community in 1987 (Scott et al. 2001). In 2000, Petersburg residents harvested an estimated 55,974 pounds net weight of halibut (+/-39%). Of this, 6,951 pounds were removed from commercial harvests, for a noncommercial harvest of 49,023 pounds, all of which was taken with rod and reel. In 2000, 468 Petersburg households had at least one member who fished for halibut for home use.

For 2005, the estimated subsistence harvest of halibut by Petersburg residents with SHARCs (1,197 SHARC holders) was 61,372 pounds net weight (Table 11). In 2004, 1,187 SHARC holders in Petersburg harvested 71,784 pounds of halibut in the subsistence fishery; in 2003, 1,047 Petersburg SHARC holders harvested 55,718 pounds. Of the total 2005 subsistence halibut harvest, 44,050 pounds (72%) was harvested with setline gear and 17,321 pounds (28%) with hand operated gear. In both 2003 and 2004, about 75% of Petersburg's subsistence halibut harvest was taken with setline gear and 25% with hand operated gear.

In 2005, Petersburg SHARC holders also harvested 23,289 pounds of halibut they classified as sport harvested. This gives a total halibut harvest by Petersburg SHARC holders of 84,661 pounds. In 2004, the sport harvest of halibut by Petersburg SHARC holders 26,408 pounds for a total harvest of 98,192 pounds of halibut. In 2003, the sport harvest was 19,611 pounds, giving a total halibut harvest of 75,329 pounds (Table 11).

In 2005, 436 Petersburg SHARC holders harvested halibut in the subsistence fishery (338 used setline gear and 175 used hand operated gear). This compares to 482 fishers in 2004 (322 used set line gear, 206 used hand operated gear) and 415 subsistence halibut fishers in 2003 (330 used setline gear, 138 used hand operated gear). In 2005, 312 Petersburg SHARC holders sport fished for halibut, as did 351 in 2004 and 268 in 2003. A total of 569 Petersburg SHARC holders either subsistence or sport fished for halibut in 2005; the estimated total halibut fishers among Petersburg SHARC holders in 2004 was 617 and for 2003 was 523 (Table 11).

Given that some Petersburg residents without SHARC cards likely sport fished for halibut, the 2003, 2004, and 2005 estimates of noncommercial halibut harvests in the community based on the SHARC survey appear consistent with the 1987 estimate based on household interviews, but are slightly higher than the estimate for 2000. Note that in 2000, when regulations restricted subsistence fishing to handlines or rod and reel using no more than 2 hooks, no Petersburg

households reported taking halibut for home use with any gear other than rod and reel, while 330 used setline gear in 2003, 322 did so in 2004, and 338 did so in 2005 (Table 11, Table 13).

Cordova (Regulatory Area 3A)

In 2000, Cordova had a population of 2,454 people, including 368 Alaska Natives (U.S. Census Bureau 2001). Cordova's estimated population in 2005 was 2,288 (ADLWD 2006). Before 2003, there were 6 Division of Subsistence household surveys that estimated home-use halibut harvests for previous years (Table 14). After subtracting fish removed from commercial harvests for home use, estimated noncommercial halibut harvests by Cordova residents ranged from 25,609 pounds (+/-33%) net weight in 1991 to 120,221 pounds (+/- 62%) in 1988, with an average over the 6 study years of 57,285 pounds. The estimated number of Cordova households with at least one member fishing noncommercially for halibut ranged from 228 in 1985 to 401 in 1992, with a mean of 325 households (ADF&G 2006).

Subsistence halibut harvest estimates and participation estimates for Cordova residents for 2003 were lower than might be expected from previous research (Fall et al. 2004:24-25). In 2003, 358 residents of Cordova obtained SHARCs (Table 11). Of these, 102 subsistence-fished (68 with setline gear, 40 with hand operated gear), 144 reported that they sport fished for halibut, and 194 fished for halibut either under the new subsistence provisions or in the sport fishery. The estimated subsistence harvest was 15,498 pounds net weight (7,613 pounds [49%] with setline gear, 7,885 pounds [51%] with hand operated gear), with an additional 11,534 pounds taken by SHARC holders while sport fishing. The total of 27,032 pounds was about 47% of the average for previous study years.

Based on these comparisons, the final report for 2003 suggested that the SHARC survey had underestimated the amount of halibut harvested by Cordova residents for home use, perhaps because not all subsistence fishers in Cordova obtained SHARCs in 2003. The results of the survey for 2004 supported this conclusion (Fall et al. 2005:25-26). A total of 526 Cordova residents had obtained SHARCs by the end of 2004 (an increase of 47% percent) (Table 11). An estimated 262 Cordova SHARC holders subsistence fished for halibut in 2004, up 157% from 2003. Of these, 174 fished with setline gear (up 156%) and 97 used hand-operated gear. The estimated subsistence halibut harvest by Cordova residents in 2004 was 40,640 pounds net weight, an increase of 163% over 2003. Sport harvests by Cordova SHARC holders (174 of whom sport fished for halibut in 2004) added 12,149 pounds to the community harvest for 2004, for a total of 52,789 pounds of halibut by 325 fishers. This total was an increase of 95% over 2003, and was about 92% of the average for the 6 survey years prior to 2003 (and exceeded the total for 3 of those 6 years). Given that some Cordova residents likely obtained halibut for home use exclusively in the sport fishery without obtaining SHARCs, the SHARC survey estimate for 2004 appeared consistent with earlier estimates of subsistence halibut harvests in Cordova.

Findings for Cordova for 2005 are much like those for 2004 and support the conclusions of the 2004 final report. As shown in Table 11, 602 Cordova residents held SHARCs in 2005, continuing the growth that had occurred in 2004, but at a slower pace. Subsistence halibut harvests totaled 47,141 pounds, up about 16% from 40,640 pounds in 2004. In 2004, 73% of the total was harvested with setline gear, as was 74% in 2005. In 2005, 281 Cordova residents

participated in the subsistence halibut fishery, compared to 262 in 2004. Cordova SHARC holders harvested 10,519 pounds of halibut while sport fishing in 2005, for a total harvest for home use of 57,660 pounds. This total is similar to the estimate for 2004 (a combined total of 52,789 pounds in the subsistence and sport fishery) and approximates the mean harvest of 57,285 pounds estimated in the 6 harvest survey study years.

Port Graham (Regulatory Area 3A)

Located in lower Cook Inlet, Port Graham had a population of 171 in 2000, including 151 Alaska Natives (U.S. Census Bureau 2001). Port Graham's population in 2005 was estimated at 134 (ADLWD 2006). It is included here as a case example to represent the small, predominantly Alaska Native communities in Regulatory Areas 3A and 3B that depend heavily on subsistence harvests of fish and wildlife resources. There are estimates of subsistence halibut harvests by Port Graham residents for 7 previous study years (Table 15). Excluding 1989, the year of the *Exxon Valdez* Oil Spill, Port Graham's halibut harvests ranged from 4,451 pounds (+/-14%) net weight in 1993 to 11,232 pounds (+/-14%) in 1992, with a 6-year average of 7,591 pounds (net weight) (Fig. 29). Again excluding 1989, an average of 38 Port Graham households had at least one member who subsistence fished for halibut in the study years in the late 1980s and 1990s.

At the close of 2005, a total of 52 Port Graham residents held a SHARC. (Recall that this total does not include Port Graham tribal members who do not live in Port Graham.) In 2005, an estimated 18 Port Graham residents subsistence fished for halibut, with 8 using setline gear and 18 using hand operated gear. Also, 9 said they sport-fished for halibut in 2005. In 2004, 42 Port Graham SHARC holders subsistence fished for halibut, with 15 using setline gear and 31 using hand operated gear; 11 said they sport fished for halibut. In 2003, 35 Port Graham SHARC holders subsistence fished for halibut (10 used setline gear, 28 used hand operated gear), and 3 said they sport fished for halibut (Table 11). The findings for 2003 and 2004 were consistent with levels of participation in the halibut fishery that could be expected from the previous studies in Port Graham, but the estimated participation level in 2005 was lower.

The subsistence halibut harvest estimate for Port Graham in 2005 was 11,127 pounds. Of this, 7,938 pounds (71%) were harvested with setline gear and 3,190 pounds (29%) with hand-operated gear. In 2004, Port Graham's estimated subsistence halibut harvest was 9,181 pounds net weight with 4,425 pounds (48%) harvested with setline gear and 4,755 pounds (52%) with hand operated gear. In 2003, the estimated halibut harvest was 11,454 pounds net weight, with 4,398 pounds (38%) harvested with setline gear and 7,056 pounds (62%) with hand operated gear. Adding halibut taken while sport fishing gives a community total of 11,615 pounds of halibut for Port Graham for 2005, compared to 10,031 pounds for 2004, and 11,610 pounds of halibut harvested in 2003 (Table 11).

While halibut harvest estimates for Port Graham for 2003, 2004, and 2005 were similar to the previous highest estimate (11,232 pounds in 1992), they exceeded the average of previous study years of 7,591 pounds. These findings are not unexpected: Port Graham has traditionally used setlines with multiple hooks to harvest halibut as well as hand-operated gear (Stanek 1985:67-69,151). With regulations in place beginning in May 2003 consistent with traditional harvest methods, residents of Port Graham and other communities with similar traditions have fished

with setline gear and hand operated gear, and reported subsistence halibut harvests that are probably similar to historic levels.²⁰

Kodiak City and Road System (Regulatory Area 3A)

“Kodiak” in this report includes the city of Kodiak (population 6,334 in 2000, including 829 Alaska Natives) and those portions of the Kodiak Island Borough connected to Kodiak city by road. This area had a population of 12,973 people in 2000, including 1,697 Alaska Natives (U.S. Census Bureau 2001). The estimated population in 2004 was 12,816 (ADLWD 2006). This is the largest rural community eligible to participate in the Alaska subsistence halibut fishery.

Based on Division of Subsistence household surveys, estimates of halibut harvests for home use are available for the entire Kodiak road system population for 1982 and 1991 (ADF&G 2006). Estimates for Kodiak city residents alone are available for 1992 and 1993, but these can be used to develop a projected total for the entire road system population (Table 16). Excluding fish removed from commercial catches for home use, halibut harvests by Kodiak road system residents ranged from 247,283 pounds usable weight (+/-30%) in 1991 to 511,254 pounds (+/-33%) in 1993. The average for the 4 available study years was 366,682 pounds; of this, 338,476 pounds (92%) was taken with rod and reel, most likely consistent with sport fishing regulations. On average for the four study years, 1,306 Kodiak road system households had at least one member who fished for halibut for home use.

Kodiak residents had obtained 1,741 SHARCs by the close of 2005, up from 1,561 SHARCS at the end of 2004 and 1,320 SHARCs at the end of 2003 (Table 11). In 2005, 871 Kodiak SHARC holders subsistence fished for halibut; most (650; 75%) used setline gear. This compares to an estimated 802 subsistence halibut fishers in Kodiak in 2004, 554 (69%) of whom used setline gear; and 646 subsistence halibut fishers in 2003, 438 of whom (68%) used setline gear. In 2005, 669 Kodiak SHARC holders sport fished for halibut, and 1,116 fished for halibut under either subsistence or sport fishing rules. This compares to 2004, when 581 Kodiak SHARC holders sport fished for halibut, and 971 fished for halibut under either subsistence or sport regulations, and 2003, when 498 Kodiak SHARC holders sport fished for halibut, and 858 either subsistence or sport fished for halibut. Given the likelihood that many Kodiak residents continued to fish for halibut under sport fishing regulations in 2003, 2004, and 2005 without obtaining SHARCs, the estimated level of participation in the subsistence fishery based on the SHARC survey appears reasonable when compared to the earlier household survey results.

The estimated subsistence harvest of halibut in 2005 for Kodiak road system area residents was 210,826 pounds net weight, up from 187,214 pounds for 2004 and 153,254 pounds estimated for 2003 (Table 11). In 2005, Kodiak subsistence fishers harvested 146,781 pounds of halibut with setline gear (70%) and 64,047 pounds (30%) with hand operated gear. This compares to 131,719 pounds (70%) harvested with setline gear and 55,605 pounds (30%) with hand operated gear in 2004, and 101,575 pounds taken in 2003 with setline gear (66%) and 51,678 pounds (34%) with hand-operated gear. In addition, Kodiak road system SHARC holders harvested an estimated

²⁰ A cautionary note for Port Graham for 2005 concerns sample size. Only 16 of 52 SHARC holders responded to the 2005 survey (31%) (Table 3). Further outreach in this community will be necessary to improve the response rate and build confidence in the harvest estimates.

82,455 pounds net weight of halibut in 2005 they classified as sport-caught, up from 73,181 pounds in 2004 and 68,170 pounds in 2003. In total, Kodiak SHARC holders harvested 293,283 pounds of halibut in 2005, compared to 260,395 pounds in 2004 and 221,424 pounds net weight in 2003. Not surprisingly, the totals for all 3 years are lower than those based on household surveys for previous years (except that the 2004 and 2005 estimates are higher than that for 1991) because, as just noted, many Kodiak road system residents who fish for halibut likely have not obtained SHARCs and continue to harvest halibut under sport fishing rules. Overall, the 2003, 2004, and 2005 subsistence harvest estimates for Kodiak appear reasonable, but they should be further evaluated using angler survey data and with additional years of subsistence harvest survey data.

Sand Point (Regulatory Area 3B)

In 2000, the population of Sand Point was 952, with an Alaska Native population of 421 (U.S. Census Bureau 2001). The population estimate for 2005 was 939 (ADLWD 2006). Prior to 2003, there was one estimate of halibut harvests for home use by Sand Point residents based on Division of Subsistence, ADF&G, household surveys, pertaining to 1992 (Fall et al. 1993). The estimated total harvest was 13,981 pounds net weight. Of this, 6,240 pounds were removed from commercial harvests, 6,934 pounds were taken with subsistence methods (setline or jigging with a hand-held line) and 807 pounds were harvested with rod and reel. The total harvest with noncommercial methods was 7,741 pounds. Of the 204 permanent households in the community, 122 harvested halibut for home use; 65 used "subsistence methods," 16 fished with rod and reel, and the rest only obtained halibut for home use from their commercial harvests.

At the end of 2003, 73 residents of Sand Point had obtained SHARCs (Table 11). The estimated subsistence halibut harvest for 2003 was 4,819 pounds net weight. Of this, 3,409 pounds were harvested with setline gear and 1,410 pounds with hand operated gear. Twenty-one Sand Point residents subsistence fished for halibut in 2003. In addition, 11 Sand Point SHARC holders harvested an estimated 410 pounds of halibut while sport fishing, for a total estimated harvest of 5,229 pounds of halibut. These are lower harvests and levels of participation than might be expected based on the 1992 survey findings.

By December 31, 2004, 351 Sand Point residents had obtained SHARCs, a very substantial increase over 2003 (Table 11). The estimated total subsistence halibut harvest was 11,355 pounds net weight. Of this total, 4,360 pounds were harvested with setline gear (38%) and 6,996 pounds (61%) with hand operated gear. In total, an estimated 109 Sand Point SHARC holders subsistence fished for halibut in 2004, about 5 times the estimate for 2003. Also, 50 Sand Point SHARC holders sport-fished for halibut, with an estimated total harvest of 1,384 pounds. In total, 121 Sand Point SHARC holders fished for halibut for home use in 2004 with a total harvest of 12,739 pounds net weight. This is more than double the 2003 estimate, and similar to the total community estimate for 1992 (which included halibut removed from commercial harvests). It is likely that the higher estimate for 2004 does not indicate an increased harvest by Sand Point residents over 2003, but rather a more complete estimate due to much larger number of participants in the SHARC program.

A total of 321 Sand Point residents held SHARCs in 2005. The estimated subsistence harvest of halibut increased to 21,901 pounds, with 12,201 pounds (56%) taken with setline gear and 9,700 pounds (44%) caught with hand operated gear (Table 11). One hundred Sand Point residents subsistence fished for halibut in 2005. In addition, 23 sport-fished for halibut, adding 1,281 pounds to the total halibut harvest for home use of 23,182 pounds. The increase in the total halibut harvest and especially in the increase in setline harvests suggests that Sand Point residents are increasingly participating in the opportunities provided by the subsistence halibut fishery.

Unalaska/Dutch Harbor (Regulatory Area 4A)

The city of Unalaska (which includes Dutch Harbor) had a population of 4,283 in 2000, including 397 Alaska Natives (U.S. Census Bureau 2001). The estimated population in 2005 was 4,297 (ADLWD 2006). The Division of Subsistence conducted a household harvest survey in Unalaska/Dutch Harbor for 1994. The estimated total halibut harvest was 97,601 pounds net weight (3,049 fish) (+/-34%), excluding 10,606 pounds (331 fish) removed from commercial catches for home use. Of the 700 households in the community, an estimated 391 (56%) had at least one member who fished for halibut in 1994. Most of the noncommercial harvest, 88,142 pounds (90%), was taken with rod and reel (ADF&G 2006)

By the close of 2003, only 92 residents of Unalaska and Dutch Harbor had obtained SHARCs (Table 11). Notably, only 14 members of the Qawalingin Tribe of Unalaska registered to subsistence fish for halibut in 2003. For the community overall and for the tribe, this was far fewer registrants than might have been predicted from the 1994 survey results. By the end of 2004, 131 Unalaska/Dutch Harbor residents had obtained SHARCs, as had 25 Qawalingin Tribe members. In 2005, 150 community members held SHARCs, as did 31 Qawalingin Tribe members. While a notable increase over 2003, this total continued to appear lower than expected.

In 2005, 88 Unalaska/Dutch Harbor residents participated in the subsistence halibut fishery and 28 sport-fished; 97 participated in either fishery. In comparison, in 2004, 81 community members subsistence fished for halibut and 34 sport-fished; 93 participated in either fishery. In 2003, 50 Unalaska/Dutch Harbor SHARC holders subsistence fished for halibut, 33 sport-fished, and 70 fished in either fishery (Table 11).

In 2005, the estimated subsistence halibut harvest in Unalaska/Dutch Harbor was 18,108 pounds. This total was divided between harvests with setline gear (9,573 pounds; 53%) and hand operated gear (8,535; 47%) (Table 11). The estimated sport harvest of halibut by Unalaska SHARC holders in 2005 was 2,439 pounds, giving a total harvest for home use by SHARC holders of 20,547 pounds. In 2004, the estimated subsistence harvest of halibut for Unalaska/Dutch Harbor residents with SHARCs was 15,530 pounds net weight, with most (9,557 pounds; 62%) taken with setline gear and the balance with hand operated gear. In addition, Unalaska/Dutch Harbor SHARC holders harvested 2,165 pounds of halibut while sport fishing in 2004, for a total halibut harvest of 17,695 pounds. The estimated subsistence harvest for Unalaska and Dutch Harbor residents with SHARCs for 2003 was 10,860 pounds net weight, and these SHARC holders harvested an additional 5,519 pounds of halibut while sport fishing, for a total noncommercial harvest of 16,379 pounds.

The 2005 total halibut harvest by Unalaska/Dutch Harbor residents represented just 21% of the harvest estimate for 1994. Similarly, the 2004 total halibut harvest was 18% of the harvest estimate for 1994 and the 2003 estimate was 17% of the 1994 estimate. There are at least 5 possible explanations for these differences. One, halibut harvests in Unalaska may have declined since 1994, although an actual level of decline of this magnitude appears unlikely. Second, the SHARC survey may have underestimated the subsistence halibut harvest if many fishers have not obtained a SHARC. A third possible explanation is that the 1994 survey might have overestimated the halibut harvest. A fourth potential explanation is that many halibut fishers in Unalaska perhaps prefer to harvest halibut under sport fishing regulations and therefore did not obtain a SHARC. A fifth possibility that may account for a decline in subsistence halibut harvests is stock abundance. The IPHC has noted a decline in abundance in Area 4A since 1994 (Gregg Williams, IPHC, personal communication, 2005). A combination of all five factors could be responsible for the unexpectedly low subsistence halibut harvest estimated for Unalaska from the SHARC surveys in all 3 study years. Further outreach in Unalaska is clearly appropriate, as well as additional research to better understand patterns of halibut fishing in the community.

Toksook Bay (Regulatory Area 4E)

As discussed in Chapter Two, 534 Toksook Bay tribal members (and 529 community residents) (population 532 in 2000 and 596 in 2005; U.S. Census Bureau 2001, ADLWD 2006) obtained SHARCs in 2003. The Division of Subsistence has not conducted a household harvest survey in this community. Wolfe (2002) estimated a subsistence halibut harvest of 12,600 pounds net weight (16,800 pounds round weight) for this community for 2000, based upon the per capita estimate for the neighboring community of Tununak from 1986. As also discussed in Chapter 1, with the assistance of the tribal government in Toksook Bay, Division of Subsistence staff evaluated the list of SHARC holders in the community, estimated the total number of subsistence halibut fishers, and conducted interviews with likely fishers. Based upon this collaboration with the tribal government, it is highly likely that most community residents who subsistence fished for halibut in 2003, 2004, and 2005 provided harvest data through the SHARC survey. Therefore, harvest estimates for Toksook Bay represent the harvests reported by respondents to the survey, and are not expanded to the total number of SHARC holders in the community.

The estimated harvest for Toksook Bay for 2003 was 24,500 pounds net weight by 54 fishers (Table 11). In the assessment by project staff, this was considered a reliable subsistence harvest estimate for the community. It should be noted that Toksook Bay is a member of the Coastal Villages Regional Fund (CVRF) CDQ organization. The majority of the 5,034 pounds of sublegal halibut retained for home use by members of this CDQ organization in 2003 was landed at Toksook Bay and Mekoryuk (Williams 2004:59-60).

For 2004, 56 Toksook Bay SHARC holders reported a harvest of 6,596 pounds of halibut, with most of this (5,737 pounds) harvested with hand operated gear (Table 11). This suggests a substantial decline in subsistence halibut harvests compared to 2003. As in 2003, a majority (69 percent of 7,120 pounds net weight) of the sublegal halibut retained for home use by the CVRF

was landed at Toksook Bay and Mekoryuk (Williams 2005), but this cannot account for the decline in subsistence harvests.

In 2005, subsistence harvests by Toksook Bay residents rebounded to 14,870 pounds; adding 98 pounds of sport-caught halibut gives a community total of 14,968 pounds (Table 11). Almost all (14,269 pounds; 96%) of the subsistence harvest was taken with hand-operated gear. Sixty-one Toksook Bay residents participated in the subsistence halibut fishery in 2005.

Tununak (Regulatory Area 4E)

Tununak had a population of 325 in 2000, 315 of whom were Alaska Native (U.S. Census Bureau 2001). The population for 2005 was 328 (ADLWD 2006). The Division of Subsistence conducted a comprehensive household harvest survey in Tununak in 1986, which provides the only estimate of subsistence halibut harvests for the community prior to the adoption of the new subsistence regulations. The harvest estimate was 1,532 fish and 30,643 pounds net (dressed) weight, with a 95% confidence limit of +/-26%. The harvest per capita was 93 pounds net weight (ADF&G 2006).

No residents of Tununak obtained SHARCs in 2003²¹, and the Traditional Elders' Council in Tununak did not approve Division of Subsistence plans to conduct interviews with potential subsistence halibut fishers for 2003. Therefore, there was no subsistence halibut harvest estimate for this community for 2003. By the close of 2004, however, 70 residents of Tununak had obtained SHARCs (Table 11). Because only 9 SHARC holders responded to the mailout survey (12.9 percent), harvest estimates for Tununak for 2004 were based on a very low sampling fraction. The estimated total subsistence halibut harvest was 1,954 pounds net weight by 31 fishers, 878 pounds harvested with set line gear and 1,076 pounds with hand operated gear. No Tununak SHARC holders reported any sport fishing activity.

As noted in Chapter One, the tribal government supported Division of Subsistence interviewing of subsistence halibut fishers in Tununak for the 2005 study year. Thirty-three of 70 SHARC holders were interviewed (47%). As in Toksook Bay, reported harvests were not expanded for Tununak because most known halibut fishers were interviewed. The total subsistence harvest of halibut was 2,661 pounds by 20 fishers. Most of the harvest (88%) was taken with hand-operated gear. There were no sport harvests of halibut in Tununak in 2005.

Compared to the results of the 1986 survey, the harvest estimate for Tununak for 2005 appears low. The reasons for this difference are uncertain. Several additional years of harvest data collection plus continuing outreach and community support will be necessary to understand subsistence halibut harvest trends in this community.

COMPARISONS WITH NON-SUBSISTENCE HARVESTS IN 2005

As reported in Table 17, the preliminary estimated total halibut removal in Alaskan waters in 2005 was 81,165,442 pounds (net weight) based on data compiled the IPHC (Gilroy personal communication 2006) and this study. In this total, the removal of 23,221 pounds of sublegal

²¹ One tribal member obtained a SHARC, but this person was not a resident of Tununak.

halibut for personal use by CDQ organizations in Areas 4D and 4E has been added to the subsistence harvest category. Commercial harvests accounted for 72.3% of halibut removals in Alaska in 2005 (Fig. 30). Bycatch of halibut in various other commercial fisheries ranked second, with 14.1% of the statewide removals. Sport harvests ranked third, with 9.9%. Wastage in commercial fisheries added 2.2% to the total halibut removals. Finally, the subsistence fishery accounted for 1.5% of the total removals of halibut in Alaska waters in 2005.

Halibut harvests by fishery in 2005 at the regulatory area level did not differ substantially from the statewide pattern (Table 17, Fig. 31). In all regulatory areas, commercial harvests accounted for 55% or more of the total pounds net weight. In Area 2C (Southeast Alaska) and Area 3A (Southcentral Alaska), sport fisheries took 17.7% and 15.2%, respectively, of the halibut harvest in 2005, but sport fisheries were smaller than the subsistence harvests in Area 3B and Area 4. Commercial bycatch accounted for 42.5% of halibut removals in Area 4. As a percentage of the total removal, subsistence halibut harvests were largest in Area 2C at 4.2% of the total (although they were less than a third of the sport harvest and about 5.6% of the commercial harvest) and 1.2% in Area 3A.

CHAPTER 4: CONCLUSIONS AND RECOMMENDATIONS

SUMMARY AND CONCLUSIONS

New federal regulations governing subsistence halibut fishing in Alaska went into effect in May 2003. The 2005 calendar year was the third for which a program was implemented to estimate the subsistence harvest of halibut under these regulations. By several measures, the program was a success. In 2005, 14,306 members of Alaska Native tribes with traditional uses of halibut and residents of eligible rural communities held subsistence halibut registration cards (SHARCs) from NMFS, an increase of 23% over the number of SHARCs that had been issued by the end of 2003. Of all SHARC holders, 8,565 (60%) voluntarily provided information about their subsistence halibut fishing activities in 2005 by responding to the survey. This compares to a response rate of 62% for the 2004 study year (8,524 respondents of 13,813 SHARC holders) and 65% percent for the 2003 study year (7,593 respondents of 11,625 SHARC holders) (Table 18).

Based on these survey returns, and estimated 5,621 individuals participated in the Alaska subsistence halibut fishery in 2005. This is a decrease of 6% from the estimated 5,984 individuals who subsistence fished for halibut in Alaska in 2004, but is 14% higher than the estimated 4,942 SHARC holders who fished in 2003. The estimated subsistence harvest of halibut in Alaska in 2005 is 55,875 fish and 1,178,222 pounds (+/-3.0%) (net weight). In comparison, the 2004 estimated subsistence harvest was 52,412 halibut and 1,193,162 net pounds (+/- 1.5%), and 43,926 halibut for 1,041,330 pounds (+/- 4%) were harvested in the subsistence fishery in 2003. As measured in pounds, the 2005 subsistence halibut harvest was about 1% lower than the harvest in 2004 and 13% higher than the 2003 estimated harvest (Table 18). The total estimated harvests for 2003, 2004, and 2005 all fell below the 1.5 million net pounds estimated for the Alaska subsistence halibut harvest when the current regulations were developed by the North Pacific Fishery Management Council (see www.fakr.noaa.gov/frules/70fr16742.pdf, page 16748; NMFS 2003). The larger estimated harvest in 2004 compared to 2003 corresponded to the greater number of individuals who held SHARCs through December 2004 and a proportional increase in the number of individuals who subsistence fished for halibut. The leveling off of the harvest in 2005 compared to 2004 is consistent with the small increase in individuals who held SHARCs for at least a portion of 2005. Average harvests per fisher were higher in 2005 compared to the first 2 years of the study: 9.9 halibut per fisher for 210 pounds, compared to 8.8 halibut per fisher for 199 pounds in 2004 and 8.9 halibut per fisher in for 211 pounds in 2003 (Table 18).

After the first 3 years of the harvest assessment program, it is not possible to determine if the overall increase in statewide harvest estimates in 2004 and 2005 compared to 2003 was the result of an actual increase in the subsistence halibut harvest, a reflection of normal year-to-year variations, a consequence of more complete participation of subsistence fishers in the SHARC program, the product of different sample sizes and the nature of the respondent pool, or the result of increasing trust on the part of subsistence fishers in the survey. As the community case studies demonstrate, a number of factors appear to have caused the differences in harvest estimates over the 3 study years, and these differ by community. Some are methodological (St. Paul for example), while other factors are probably linked to more thorough and accurate documentation of harvests (Cordova, Sand Point) rather than a true increase.

In 2005, most subsistence halibut were harvested with setline (stationary) gear (70%) and the rest with hand operated gear (30%). Similarly, in 2004, 74% of the subsistence halibut were harvested with setline (stationary) gear, and in 2003, setlines accounted for 72% of the harvest.

The largest portion of the Alaska subsistence halibut harvest in 2005 occurred in Regulatory Area 2C (Southeast Alaska), 51% (598,072 pounds); followed by Area 3A (Southcentral Alaska), 36% (429,275 pounds); Area 4E (East Bering Sea Coast), 5% (54,119 pounds); Area 3B (Alaska Peninsula), 4% (46,225 pounds); Area 4A (Eastern Aleutian Islands), 3% (35,615 pounds); Area 4C (Pribilof Islands), 1% (7,716 pounds); Area 4D (Central Bering Sea), less than 1% (5,848 pounds); and Area 4B (Western Aleutian Islands), less than 1% (1,351 pounds). In 2004 and 2003 also, Area 2C (Southeast Alaska) and Area 3A (Southcentral Alaska) accounted for most of the subsistence harvests. The proportion of the statewide subsistence halibut harvest occurring in Area 2C (Southeast Alaska) has declined from 60% in 2003 to 57% in 2004 and 51% in 2005. Correspondingly, the portion occurring in Area 3A (Southcentral Alaska) has increased from 27% in 2003 to 34% in 2004 and 36% in 2005. Subsistence harvests accounted for 1.5% of the total halibut removals in Alaska waters in 2005, compared to 1.5 % in 2004 and 1.3% in 2003.

Subsistence halibut fishers had an estimated incidental harvest of 12,395 rockfish in 2005. This is a decline of 35% from the estimated harvest of 19,001 rockfish in 2004, and a decline of 17% from the 14,870 rockfish harvested in the fishery in 2003 (Table 18). There were 1,544 SHARC holders who harvested rockfish while subsistence halibut fishing in 2005, compared to 1,616 in 2004 and 1,239 in 2003. Most of the incidental rockfish harvests in 2005 occurred in Area 2C (63%), as they had in 2004 (68%) and 2003 (67%).

In 2005, subsistence halibut fishers harvested an estimated 2,355 lingcod in the subsistence halibut fishery. This is a decline of 47% from the estimate of 4,407 lingcod harvested in the subsistence halibut fishery in 2004 and a decline of 29% from the 2003 estimate of 3,298 lingcod. In total, 862 SHARC holders harvested lingcod while subsistence halibut fishing in 2005. This is 10% lower than the 953 SHARC holders who had an incidental harvest of lingcod in 2004, but 23% higher than the estimate of 699 SHARC holders in 2003 (Table 18). As with rockfish, most of the incidental lingcod harvest took place in Area 2C in 2005 (56%), 2004 (56%) and 2003 (51%).

As discussed above, comparisons of the 2003, 2004, and 2005 harvest estimates with those from previous research by the Division of Subsistence are complicated by different research methods, but such comparisons are still instructive. Subsistence harvest estimates for most of the larger communities (combining tribal and rural SHARC holders) such as Sitka, Petersburg, and Kodiak for 2003, 2004, and 2005 are similar to earlier estimates based on household surveys. This is significant in that these communities account for a very large percentage of the total harvest. We conclude that the first 3 years of the survey of SHARC holders produced sound estimates of subsistence harvests of halibut in Alaska based on a scientific sample and a relatively high response rate. The estimates can be further evaluated in the future as the new subsistence regulations become more completely implemented and additional years of harvest data are

collected. Continued documentation of the subsistence harvests is also necessary for any meaningful discussion of trends in the fishery.

RECOMMENDATIONS

We conclude this report with the following recommendations based on experiences during the first 3 years of this project. These suggestions are similar to those that were offered at the conclusion of the first and second years' reports (Fall et al. 2004:30-31; Fall et al. 2005:34-36).

1. The harvest assessment program for the Alaska subsistence halibut fishery should continue for at least one more year to document harvests occurring in 2006, using methods similar to those employed for 2003, 2004, and 2005. This 4-year effort will continue the development of a time series for assessment of harvest trends as well as for assessment of the information collected for the first years of the fishery. As discussed above, the methods used for 2003, 2004, and 2005 (a short, mailed survey with 3 mailings, supplemented by community outreach, interviewing in selected communities, and partnerships with tribal governments), were successful and should be retained to facilitate comparisons across study years. In addition, implementation of a program to collect harvest data in-season in selected communities should be considered on a trial basis to help supplement and evaluate the data collected through the mailed survey.²² Further, given that the subsistence fishery is operating under relatively new regulations, consideration should be given to continuing the present study to at least a total of 5 years to strengthen the time series data and trend analysis.

2. Outreach is needed in several communities, including Unalaska/Dutch Harbor, Angoon, and perhaps Sand Point, based on relatively low response rates or unexpectedly low numbers of SHARCs issued. Contracts with tribal governments or local hiring in Sitka, Hydaburg, and Ketchikan should be renewed for the fourth year to build upon the successful work in those communities in the first 3 years of the program. Collaboration with the Central Bering Sea Fishermen's Association should also continue in order to develop a reliable harvest estimate for St. Paul.

3. Further community outreach should continue in Area 4E (East Bering Sea Coast). There are many communities in this very large geographic area but relatively few SHARCs were issued. For the 2005 study year (as discussed in Chapter One), the focus of this outreach was on those communities that are known to have relatively large traditional harvests of halibut. Harvests in many other communities in this area are likely to be small. Although a major outreach effort including most of these other communities would be expensive and unnecessary, communications with tribal

²² In October 2005, when the grant award between NMFS and the Division of Subsistence of ADF&G was amended to add funds to support the third year of the mail-out survey for 2005, funds were also included to plan and implement a pilot project to collect subsistence halibut harvest data in season in Kodiak and Sitka. That in-season project was implemented in the summer of 2006. Findings will be reported in final report for the 2006 harvest year. In addition, the funding provided in 2005 supported further community outreach efforts. In June 2006, the agreement between NMFS and the Division of Subsistence was amended to add funds to support the mail survey for the 2006 study year.

governments could result in more enrollments in the SHARC program and more confidence in the survey results.

4. Regulations were adopted by NMFS in late 2004 creating a community harvester program for subsistence halibut fishing. It will be essential to integrate this program into the SHARC harvest assessment program. This will entail further cooperative work with tribal governments.

5. If rockfish or lingcod incidental harvests in the halibut subsistence fishery continue to be of interest to managers in some areas, more specific data collection tools need to be developed to collect harvest data at the species level for rockfish in particular communities. This should only be done in selected areas of concern given the additional costs to data collection and analysis that this will entail (see Wolfe 2002 for more discussion of collection of rockfish harvest data through the SHARC survey). Such research should only occur through partnerships with local communities and tribes, and should include a combination of participant observation, key respondent interviewing, and survey methods.²³

6. Further evaluation of sport fish harvest data, achieved through the mailed survey administered by the Division of Sport Fish of ADF&G, should take place for the larger rural communities participating in the subsistence halibut fishery for at least several years. (Analysis of these data for Sitka was conducted as a pilot effort for 2004. See Fall et al. 2005:22-24.) As discussed in Chapter 2 and Chapter 3, many SHARC holders also reported that they sport fished for halibut in 2003, 2004, and 2005. It will be important to try to determine if a shift in harvest from the “sport” category to the subsistence category is occurring, in order to evaluate trends in the subsistence fishery and the effect of the new subsistence halibut regulations on fishing patterns. Also, as also noted in Chapter 3, comparisons of community harvest estimates from previous research require consideration of sport harvests as well as harvests under the new subsistence regulations. Such comparisons are also important for evaluating the subsistence harvest assessment program and the performance of the new subsistence regulations.

7. Consideration should be given to funding and implementing ethnographic investigations in key halibut fishing communities to evaluate the effects of the new subsistence fishing regulations on fishing patterns. These studies would entail more detailed interviewing of fishers regarding any changes in gear choice, fishing effort, harvest amounts, incidental harvests of rockfish or lingcod, or other fishing activities that have resulted from the regulatory changes. These interviews could also investigate traditional knowledge about local halibut stocks (as well as local stocks of rockfish and lingcod) that might prove useful to management agencies, communities, and tribes for future management of the subsistence, sport, and commercial halibut fisheries in Alaska.

²³ In 2006, the Division of Subsistence, ADF&G, received funding from the North Pacific Research Board to conduct research on subsistence rockfish fishing in Sitka (southeast Alaska), Chenega Bay (Prince William Sound), and Nanwalek and Port Graham (lower Cook Inlet). Findings of this research will be available in 2007.

REFERENCES CITED

- Alaska Department of Fish and Game. 2006. Community Subsistence Information System. Division of Subsistence. Juneau.
- Alaska Department of Labor and Workforce Development (ADLWD). 2006. Population estimates for 2005 (<http://www.labor.state.ak.us/research/pop/estimates> on September 18, 2006
- Cochran, W. G. 1977. Sampling techniques. 3rd ed. John Wiley & Sons, New York.
- Crapo, Chuck, Brian Paust, and Jerry Babbitt. 1993. Recoveries and Yields from Pacific Fish and Shellfish. Alaska Sea Grant College Program, Marine Advisory Bulletin No. 37. Fairbanks.
- Fall, James A., David B. Andersen, Louis Brown, Michael Coffing, Gretchen Jennings, Craig Mishler, Amy Paige, Charles J. Utermohle, and Vicki Vanek. 1993. Noncommercial Harvests and Uses of Wild Resources in Sand Point, Alaska, 1992. Alaska Department of Fish and Game, Division of Subsistence Technical Report 226. Juneau.
- Fall, James A., Madel Kerlin, Bridget Easley, and Robert J. Walker. 2004. Subsistence Harvests of Pacific Halibut in Alaska, 2003. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 288. Juneau.
- Fall, James A., Mykel George, and Bridget Easley. 2005. Subsistence Harvests of Pacific Halibut in Alaska, 2004. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 304. Juneau.
- Gilroy, Heather. 2005. The Pacific Halibut Fishery, 2004. International Pacific Halibut Commission 2005 Annual Management Bluebook, pages 5 – 18.
- _____. 2006. Personal communication regarding Pacific halibut removals in Alaska in 2006. International Pacific Halibut Commission.
- National Marine Fisheries Service (NMFS)
- 2000 Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for a Regulatory Amendment for Defining a Halibut Subsistence Fishery Category (EA/RIR/RFA). North Pacific Fishery Management Council, Alaska Department of Fish and Game, International Pacific Halibut Commission, and National Marine Fisheries Service. Anchorage, August 11, 2000.
- 2003 Environmental Assessment of a Regulatory Amendment to Define a Halibut Subsistence Fishery Category in Convention Waters. April 2, 2003. www.fakr.noaa.gov/analyses/subsistence/halibut0403.pdf

Scott, Cheryl, Louis A. Brown, Gretchen B. Jennings, and Charles J. Utermohle
2001 Community Profile Database for Access 2000. Version 3.12. Alaska Department of Fish and Game, Division of Subsistence. Juneau.

Stanek, Ronald

1985 Patterns of Wild Resource Use in English Bay and Port Graham, Alaska. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 104. Juneau.

Trumble, Robert J.

1999 1998 Estimates of Personal Use Halibut. International Pacific Halibut Commission. Report of Assessment and Research Activities 1998: 61-64.

United States Census Bureau.

2001 Profiles of General Demographic Characteristics, 2000 Census of Population and Housing: Alaska. U.S. Department of Commerce. Washington, D.C.

Williams, Gregg H.

2004 Retention of Sublegal Halibut in the Areas 4D/4E CDQ Fishery: 2003 Harvests. International Pacific Halibut Commission. Report of Assessment and Research Activities 2003: pp. 59-60.

2005 Retention of Sublegal Halibut in the Areas 4D/4E CDQ Fishery: 2004 Harvests. International Pacific Halibut Commission Report of Assessment and Research Activities 2004: 59-60.

Wolfe, Robert J.

2001 Subsistence Halibut Fishing in Alaska – Harvest Patterns. Presentation to the Alaska Board of Fisheries, May 2001 (RC 8). Alaska Department of Fish and Game, Division of Subsistence.

2002 Subsistence Halibut Harvest Assessment Methodologies. Report prepared for the National Marine Fisheries Service, Sustainable Fisheries Division. Robert J. Wolfe and Associates. San Marcos, CA.

Wolfe, Robert J., James A. Fall, and Ronald T. Stanek

2005 The Subsistence Harvest of Harbor Seals and Sea Lions by Alaska Natives in 2004. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No.303. Juneau.

REPORT TABLES

Table 1. Population of Rural Communities Eligible to Participate in the Alaska Subsistence Halibut Fishery, 2000 and 2005

Community ¹	Regulatory Area	Population: 2000		Population: 2005
		Total	Alaska Native	
ANGOON	2C	572	419	497
COFFMAN COVE	2C	199	12	156
CRAIG	2C	1,397	432	1,417
EDNA BAY	2C	49	2	41
ELFIN COVE	2C	32	0	29
GUSTAVUS	2C	429	32	459
HAINES	2C	1,811	332	1,525
HOLLIS	2C	139	13	137
HOONAH	2C	860	597	861
HYDABURG	2C	382	342	369
HYDER	2C	97	4	91
KAKE	2C	710	530	598
KASAAN	2C	39	19	61
KLAWOCK	2C	854	496	780
KLUKWAN	2C	139	123	109
METLAKATLA	2C	1,375	1,125	1,343
MEYERS CHUCK	2C	21	2	15
PELICAN	2C	163	42	115
PETERSBURG	2C	3,224	388	3,155
POINT BAKER	2C	35	3	22
PORT ALEXANDER	2C	81	11	75
PORT PROTECTION	2C	63	7	54
SAXMAN	2C	431	302	405
SITKA	2C	8,835	2,178	8,947
SKAGWAY	2C	862	44	834
TENAKEE SPRINGS	2C	104	5	98
THORNE BAY	2C	552	27	486
WHALE PASS	2C	58	2	76
WRANGELL	2C	2,308	550	1,974
Regulatory Area 2C Subtotals ⁵		25,821	8,039	24,729
AKHIOK	3A	80	75	41
CHENEGA BAY	3A	86	67	82
CORDOVA	3A	2,454	368	2,288
KARLUK	3A	27	26	27
KODIAK ²	3A	12,973	1,697	12,816
LARSEN BAY	3A	115	91	97
NANWALEK	3A	177	165	222
OLD HARBOR	3A	237	203	200
OUZINKIE	3A	225	197	191
PORT GRAHAM	3A	171	151	134
PORT LIONS	3A	253	163	220
SELDOVIA	3A	286	66	391
TATITLEK	3A	107	91	102
YAKUTAT	3A	680	375	618
Regulatory Area 3A Subtotals		17,871	3,735	17,429

[continued]

Table 1. [continued]

Community ¹	Regulatory Area	Population: 2000		Population: 2005
		Total	Alaska Native	
CHIGNIK	3B	79	48	95
CHIGNIK LAGOON	3B	103	85	86
CHIGNIK LAKE	3B	145	127	117
COLD BAY	3B	88	15	89
FALSE PASS	3B	64	42	63
IVANOF BAY	3B	22	21	2
KING COVE	3B	792	379	723
NELSON LAGOON	3B	83	68	70
PERRYVILLE	3B	107	105	114
SAND POINT	3B	952	421	939
Regulatory Area 3B Subtotals		2,435	1,311	2,298
AKUTAN	4A	713	117	773
NIKOLSKI	4A	39	27	31
UNALASKA	4A	4,283	397	4,297
Regulatory Area 4A Subtotals		5,035	541	5,101
ADAK	4B	316	118	167
ATKA	4B	92	84	90
Regulatory Area 4B Subtotals		408	202	257
ST GEORGE ISLAND	4C	152	140	128
ST PAUL ISLAND	4C	532	460	488
Regulatory Area 4C Subtotals		684	600	616
GAMBELL	4D	649	622	660
SAVOONGA	4D	643	614	695
DIOMEDE	4D	146	137	132
Regulatory Area 4D Subtotals		1,438	1,373	1,487
ALAKANUK	4E	652	638	678
ALEKNAGIK	4E	221	187	241
BREVIG MISSION	4E	276	254	327
BETHEL	4E	5,471	3,719	5,960
CHEFORNAK	4E	394	386	457
CHEVAK	4E	765	734	916
CLARK'S POINT	4E	75	69	65
COUNCIL ANVSA ³	4E	0	0	0
DILLINGHAM	4E	2,466	1,503	2,370
EEK	4E	280	271	291
EGEGIK	4E	116	89	81
ELIM	4E	313	297	302
EMMONAK	4E	767	720	740
GOLOVIN	4E	144	133	150
GOODNEWS BAY	4E	230	216	238
HOOPER BAY	4E	1,014	971	1,133
KING SALMON	4E	442	133	420

[continued]

Table 1. [continued]

Community ¹	Regulatory Area	Population: 2000		Population: 2005
		Total	Alaska Native	
KIPNUK	4E	644	631	688
KONGIGANAK	4E	359	349	427
KOTLIK	4E	591	568	609
KOYUK	4E	297	280	350
KWIGILLINGOK	4E	338	331	361
LEVELOCK	4E	122	116	54
MANOKOTAK	4E	399	378	437
MEKORYUK	4E	210	203	192
NAKNEK	4E	678	319	577
NAPAKIAK	4E	353	341	373
NAPASKIAK	4E	390	383	428
NEWTOK	4E	321	311	315
NIGHTMUTE	4E	208	197	234
NOME	4E	3,505	2,057	3,508
OSCARVILLE	4E	61	61	59
PILOT POINT	4E	100	86	73
PLATINUM	4E	41	38	38
PORT HEIDEN	4E	119	93	89
QUINHAGAK	4E	555	540	642
SCAMMON BAY	4E	465	453	509
SAINT MICHAEL	4E	368	343	509
SHAKTOOLIK	4E	230	218	224
SHELDON POINT	4E	164	154	158
SHISHMAREF	4E	562	531	581
SOLOMON ANVSA	4E	4	3	8
SOUTH NAKNEK	4E	137	115	76
STEBBINS	4E	547	518	596
TELLER	4E	268	248	263
TOGIAK	4E	809	750	779
TOKSOOK BAY	4E	532	519	596
TUNTUTULIAK	4E	370	366	399
TUNUNAK	4E	325	315	328
TWIN HILLS	4E	69	65	71
UGASHIK	4E	11	9	15
UNALAKLEET	4E	747	655	710
WALES	4E	152	137	151
WHITE MOUNTAIN	4E	203	175	224
Regulatory Area 4E Subtotals		28,880	23,176	30,020
Grand Total		82,572	38,977	81,937

Source: U.S. Census Bureau 2001; Alaska Department of Labor and Workforce Development population estimates for 2005 (<http://www.labor.state.ak.us/research/pop/estimates> on September 18, 2006)

¹ Alaska Native Village statistical Area populations were used whenever no city or census designated place (CDP) populations were present in the census.

² Total population for Kodiak Island road system area; includes Kodiak City, Kodiak Station, Chiniak, and other areas on the road system.

³ There is no census table for a Council CDP or municipality. The Council ANVSA table indicated that all 40 housing units were vacant.

⁴ No Alaska Native Population data are available for 2005.

⁵ Non-tribal residents of Naukati Bay were not eligible for SHARCs in 2004. The NPFMC in late 2004 recommended that Naukati Bay be added to the eligible list, but regulatory action had not occurred by late 2005. Naukati Bay had a population of 135, including 13 Alaska Natives, in 2000, and a total population of 106 in 2005.

Table 2. Project Chronology, 2005 Study Year

Date	Event/Action
September 1, 2005	Amendment 1 to Award No. NA04NMF4370314 finalized between NMFS and ADF&G to support the research for study year 2005
December 20, 2005	Mailing of letter to tribes concerning mailout of surveys for the second year of the project
Mid January 2006	Running of newspaper ads
January 31, 2006	ADF&G news release regarding mailing of SHARC surveys
February 2, 2006	First mailing of survey forms
March 6, 2006	Development of informal agreement with the Central Bering Sea Fishermen's Association to assist with outreach in St. Paul
March 21, 2006	Second mailing of survey forms
March 15 - April 7, 2006	Survey administration in Toksook Bay; phone calls to SHARC holders in selected other western Alaska communities
April through June 2006	Administration of surveys in Sitka, Hydaburg, and Ketchikan
April 25, 2006	Third mailing of survey forms
April 28, 2006	Submission of semi-annual report on project progress to NMFS
May 16 - 18, 2006	M. Brock traveled to meetings in Sitka, Ketchikan, and Saxman to discuss the project
November 1, 2006	Release of public review draft of final report
December X, 2006	Presentation of study findings, ANSHWG, Anchorage
December 6, 2006	Presentation of study findings, NPFMC, Anchorage
December 20, 2006	Completion of revised, final report

Table 3. Sample Achievement, Alaska Subsistence Hallbut Survey for 2005, by Eligible Alaska Tribe, Eligible Alaska Rural Community, and Place of Residence

Tribe Name	First Mailing		Second Mailing		Third Mailing		Totals	
	Surveys Mailed	Surveys Returned	Surveys Mailed	Surveys Returned	Surveys Mailed	Surveys Returned	Surveys Mailed	Surveys Returned
ADDAWUX TRIBE OF KING COVE	39	15	27	4	21	39	23	59.0%
ANOOKUN TRADITIONAL COUNCIL	2	26	1	11	90	129	45	34.9%
CENTRAL COUNCIL THLUIT AND HADA INDIAN TRIBES	615	190	427	47	342	41	615	45.5%
CHEVAK NATIVE VILLAGE (GASHUAMUUT)	9	4	6	2	5	6	6	83.3%
CHONIK LAKE VILLAGE	9	4	6	2	9	6	6	66.7%
CHONIK	1	1	1	1	1	1	1	100.0%
CHILKAT INDIAN VILLAGE	38	14	24	7	38	22	32	83.8%
CHILKOOT INDIAN ASSOCIATION	47	24	28	4	20	2	30	63.8%
CRAG COMMUNITY ASSOCIATION	55	26	31	4	26	2	32	58.2%
DOUGLAS INDIAN ASSOCIATION	22	6	17	3	13	22	13	59.1%
EGEIK VILLAGE	6	6	0	0	6	6	6	100.0%
HOONAH INDIAN ASSOCIATION	200	53	152	19	123	15	200	43.5%
HAYDABURG COOPERATIVE ASSOCIATION	181	41	139	4	129	15	181	89.0%
MAHOFF BAY VILLAGE	7	2	5	0	7	2	7	28.6%
KENANTEE INDIAN TRIBE	66	29	44	10	27	6	45	68.2%
KETCHIKAN INDIAN CORPORATION	770	190	562	56	458	31	770	40.6%
KING ISLAND NATIVE COMMUNITY	1	1	1	1	1	1	1	100.0%
KLAWOCK COOPERATIVE ASSOCIATION	165	44	128	17	98	22	165	50.3%
LESNOI VILLAGE (WOODY ISLAND)	224	61	156	15	131	14	224	40.6%
LEVELOCK VILLAGE	1	1	1	1	1	1	1	100.0%
METUKATLA INDIAN COMMUNITY	380	82	303	28	263	21	380	34.5%
MAKNEK NATIVE VILLAGE	6	2	4	1	3	3	3	50.0%
NATIVE VILLAGE OF AFOGWAK	24	12	10	4	6	2	18	75.0%
NATIVE VILLAGE OF AKHOK	24	2	22	2	17	3	24	37.5%
NATIVE VILLAGE OF AKUTAN	44	6	44	2	36	1	44	20.5%
NATIVE VILLAGE OF ALEKNAKIK	4	4	4	4	4	4	4	100.0%
NATIVE VILLAGE OF ATKA	5	5	5	5	5	5	5	100.0%
NATIVE VILLAGE OF BELKOFSAH	27	4	24	2	19	5	27	40.7%
NATIVE VILLAGE OF CHENGA	14	7	11	3	4	0	14	71.4%
NATIVE VILLAGE OF CHIGNIK	39	19	21	2	14	5	39	66.7%
NATIVE VILLAGE OF CHIGNIK LAGOON	1	1	1	1	1	1	1	100.0%
NATIVE VILLAGE OF DILLINGHAM (CURVUNG)	23	5	16	3	8	0	23	73.9%
NATIVE VILLAGE OF EEK	21	3	17	3	11	8	3	52.4%
NATIVE VILLAGE OF EKUK	3	3	3	3	3	3	3	100.0%
NATIVE VILLAGE OF EVAK	67	26	42	2	23	9	67	64.2%
NATIVE VILLAGE OF FALSE PASS	13	2	11	2	9	0	13	30.8%
NATIVE VILLAGE OF GAMBELL	6	0	6	0	6	0	6	0.0%
NATIVE VILLAGE OF GOODNEWS BAY (MUMTRAO)	15	8	8	0	6	0	15	60.0%
NATIVE VILLAGE OF HOOPER BAY	89	12	78	12	61	5	89	65.2%
NATIVE VILLAGE OF KAPLUK	5	5	5	5	5	5	5	100.0%
NATIVE VILLAGE OF KAPNUK	88	7	79	3	77	1	88	45.5%
NATIVE VILLAGE OF KONGANUK	10	2	8	2	6	0	10	60.0%
NATIVE VILLAGE OF KONGILGONOK	46	2	44	2	43	0	46	39.1%
NATIVE VILLAGE OF KWINHAGAK	11	3	10	7	7	0	11	54.5%
NATIVE VILLAGE OF LARSEN BAY	41	16	25	7	18	8	41	75.6%
NATIVE VILLAGE OF MERONYUK	15	7	10	0	7	1	15	100.0%
NATIVE VILLAGE OF NAFYAK	32	9	24	0	23	0	32	28.1%
NATIVE VILLAGE OF NELSON LAGOON	3	3	3	3	3	3	3	100.0%
NATIVE VILLAGE OF NIGHTMUTE	8	0	8	0	7	0	8	50.0%
NATIVE VILLAGE OF NIKOLSKI	12	0	12	0	12	0	12	0.3%
NATIVE VILLAGE OF OUZINIK	34	15	18	2	14	1	34	52.9%
NATIVE VILLAGE OF PERRYVILLE	36	21	18	3	12	0	36	66.7%
NATIVE VILLAGE OF PORT GRAYHAM	42	8	34	4	29	1	42	31.0%
NATIVE VILLAGE OF PORT HEIDEN	1	1	1	1	1	1	1	100.0%
NATIVE VILLAGE OF PORT LIONS	56	20	39	11	25	4	56	62.5%
NATIVE VILLAGE OF SAVOONA	42	8	35	2	32	1	42	26.2%
NATIVE VILLAGE OF SCAMMON BAY	5	5	5	5	5	5	5	100.0%
NATIVE VILLAGE OF SHAKTOOLIK	1	1	1	1	1	1	1	100.0%
NATIVE VILLAGE OF SHISHMARFEE	1	1	1	1	1	1	1	100.0%
NATIVE VILLAGE OF TATLEK	32	15	19	2	14	1	32	56.3%
NATIVE VILLAGE OF TOKSOOK BAY (NUUKAUYAYAK)	527	33	495	7	485	12	527	29.2%

Continued

Table 3. Sample Achievement, continued

Tribal Name	First Mailing			Second Mailing			Third Mailing			Totals					
	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	SHARCs Issued	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
NATIVE VILLAGE OF TUNUNAK	73	4	0	70	1	0	68	1	0	73	6	28	34	46.6%	0
NATIVE VILLAGE OF UNALAKLEET	5														
NATIVE VILLAGE OF UNGA	8	4	0	5	1	0	3	0	0	8	5	0	5	62.5%	0
NATIVE VILLAGE OF WHITE MOUNTAIN	2														
NEWTOK VILLAGE	3														
NINILCHIK VILLAGE	96	33	1	70	10	0	55	2	0	96	45	0	45	46.9%	1
NOME ESKIMO COMMUNITY	15	2	0	13	1	0	12	1	0	15	4	0	4	26.7%	0
ORGANIZED VILLAGE OF KAKE	113	32	6	80	15	1	60	9	0	113	56	0	56	49.6%	7
ORGANIZED VILLAGE OF KASAAN	8	1	0	7	2	0	4	1	0	8	4	0	4	50.0%	0
ORGANIZED VILLAGE OF SAXMAN	59	13	3	43	8	0	34	2	0	59	23	10	33	55.9%	3
ORUTSARARUIT NATIVE VILLAGE	8	4	0	4	0	0	4	0	0	8	4	0	4	50.0%	0
PAULOFF HARBOR VILLAGE	53	11	1	44	7	0	34	0	1	53	18	0	18	34.0%	2
PETERSBURG INDIAN ASSOCIATION	118	49	10	61	11	0	48	8	0	118	68	0	68	57.6%	10
PLATINUM TRADITIONAL VILLAGE	1														
PRIBILOF ISLANDS ALEUT COMMUNITY OF ST GEORGE	25	5	0	20	0	0	20	0	0	25	5	0	5	20.0%	0
PRIBILOF ISLANDS ALEUT COMMUNITY OF ST PAUL	224	21	1	207	18	1	181	6	0	224	45	130	175	78.1%	2
QAGAN TOYAGUNGIN TRIBE OF SAND POINT VILLAGE	264	55	9	205	24	1	173	11	1	264	90	0	90	34.1%	11
QAWALINGIN TRIBE OF UNALASKA	31	7	1	26	3	0	20	1	0	31	11	0	11	35.5%	1
SELDOVIA VILLAGE TRIBE	41	20	0	23	2	1	16	7	0	41	29	0	29	70.7%	1
SHOONAQ' TRIBE OF KODIAK	155	65	7	97	14	3	64	16	1	155	95	0	95	61.3%	11
SITKA TRIBE OF ALASKA	436	134	22	299	24	6	248	42	2	436	200	62	262	60.1%	30
SKAGWAY VILLAGE	1														
SOUTH NAKNEK VILLAGE	2														
TRADITIONAL VILLAGE OF TOGIAK	11	2	0	10	1	0	8	1	0	11	4	0	4	36.4%	0
UGASHIK VILLAGE	4														
VILLAGE OF CHEFORNAK	17	1	0	16	2	0	12	2	0	17	5	9	14	82.4%	0
VILLAGE OF CLARK'S POINT	3														
VILLAGE OF KANATAK	8	1	0	7	0	0	7	0	0	8	1	0	1	12.5%	0
VILLAGE OF OLD HARBOR	45	11	0	35	6	1	27	1	0	45	18	0	18	40.0%	1
VILLAGE OF SALAMATOFF	13	9	0	4	0	0	4	1	0	13	10	0	10	76.9%	0
WRANGELL COOPERATIVE ASSOCIATION	97	49	2	49	13	1	29	5	0	97	67	0	67	69.1%	3
YAKUTAT TLINGIT TRIBE	58	23	2	37	6	0	28	1	0	58	30	0	30	51.7%	2
Tribal Name Subtotals	6,437	1,671	181	4,822	499	64	3,995	371	20	6,437	2,541	579	3,120	48.5%	265

48

Rural Community	First Mailing			Second Mailing			Third Mailing			Totals					
	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	SHARCs Issued	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
ADAK	13	3	0	11	0	1	9	7	0	13	10	0	10	76.9%	1
AKHIOK	1														
AKUTAN	4														
ALEKNAGIK	4														
ANGOON	33	14	0	22	4	2	13	3	0	33	21	0	21	63.6%	2
ATIKA	12	2	0	12	2	0	8	0	0	12	4	0	4	33.3%	0
BETHEL	5														
CHEFORNAK	3														
CHENEGA BAY	12	6	0	7	0	0	6	1	0	12	7	0	7	58.3%	0
CHEVAK	5														
CHIGNIK	11	8	0	3	0	0	2	1	0	11	9	0	9	81.8%	0
CHIGNIK LAGOON	10	4	0	6	0	0	6	0	0	10	4	0	4	40.0%	0
CHIGNIK LAKE	4														
CHINIYAK	2														
CLARKS POINT	1														
COFFMAN COVE	45	31	2	21	5	0	7	2	0	45	38	0	38	84.4%	2
COLD BAY	21	8	0	14	1	2	10	1	0	21	10	0	10	47.6%	2
CORDOVA	542	310	14	248	49	2	159	22	6	542	381	0	381	70.3%	22
CRAIG	352	198	8	189	29	2	125	16	4	352	243	0	243	69.0%	14
DILLINGHAM	44	28	0	17	0	0	15	7	0	44	35	0	35	79.5%	0
EDNA BAY	52	28	0	33	7	0	17	5	0	52	40	0	40	76.9%	0
EEK	1														

(continued)

Table 3. Sample Achievement, continued

Rural Community	First Mailing		Second Mailing		Third Mailing		Totals	
	Surveys Returned	Mailed Undeliverable	Surveys Returned	Mailed Undeliverable	Surveys Returned	Mailed Undeliverable	Surveys Returned	Mailed Undeliverable
ELFIN COVE	20	13	0	11	6	0	20	14
EMMONAK	1	1	0	0	0	0	5	3
FALSE PASS	5	1	0	4	2	0	3	60.0%
GAMBELL	1	0	0	0	0	0	0	0
GOODNEWS BAY	2	0	0	0	0	0	0	0
GUSTAVUS	76	48	1	35	24	3	76	57
HAINES	477	319	11	194	97	2	477	387
HOLLIS	52	32	1	29	19	0	52	37
HOONAH	141	73	4	77	50	1	141	91
HOONAH	0	0	0	0	0	0	0	0
HOOPER BAY	0	0	0	0	0	0	0	0
HYPABURG	18	11	0	7	7	1	18	12
HYPABURG	0	0	0	0	0	0	0	0
HYPABURG	39	12	0	29	16	5	30	30
KAKE	54	25	4	33	20	4	54	35
KASAN	20	12	0	13	8	0	20	12
KETCHIKAN	2	2	0	0	0	0	2	2
KING COVE	23	12	0	13	9	5	23	18
KING SALMON	5	1	0	0	0	0	5	1
KIPNUK	1	0	0	0	0	0	1	0
KLAWOCK	127	74	4	61	44	3	127	87
KLUKWAN	3	0	0	0	0	0	3	0
KODIAK	1538	780	47	880	558	93	1538	996
KONGIGANAK	3	0	0	0	0	0	3	0
KOTLIK	1	0	0	0	0	0	1	0
KOYUK	1	0	0	0	0	0	1	0
LARSEN BAY	16	10	0	8	3	1	16	12
MEKORUK	2	2	0	0	0	0	2	2
MEKORUK	13	13	5	29	22	3	46	18
METLAKATLA	46	6	0	10	5	0	10	10
MEYERS CHUCK	14	6	0	4	0	0	14	10
MAKNEK	5	3	0	3	0	0	3	0
MAKNEK	1	1	0	0	0	0	1	0
NEWTOK	24	1	0	22	21	1	24	2
NIGHTMUTE	7	4	0	5	2	0	7	5
NIKOLSKI	11	4	0	8	6	0	11	4
NOME	35	18	1	21	7	2	35	24
OLD HARBOR	16	7	2	7	5	1	16	10
OUZINKIE	16	7	2	7	5	1	16	10
PELICAN	48	23	3	24	16	4	48	33
PERRYVILLE	1	0	0	0	0	0	1	0
PETERSBURG	1065	580	25	532	361	64	1065	743
PLATNUM	1	0	0	0	0	0	1	0
PORT ALEXANDER	26	11	1	17	10	0	26	17
PORT ALEXANDER	16	3	0	13	8	1	16	7
PORT HEIDEN	1	0	0	0	0	0	1	0
PORT LIONS	32	16	0	22	15	3	32	21
PORT PROTECTION	19	12	0	9	8	0	19	13
PT. BAYER	18	12	1	7	4	1	18	14
QUINHAGAK	4	4	0	0	0	0	4	0
SAND POINT	18	8	0	10	6	2	18	11
SAVOONGA	2	2	0	2	1	0	2	0
SAYMAN	36	16	2	19	16	1	36	19
SCAMMON BAY	5	69	4	52	31	7	115	86
SELDOVA	115	69	4	52	31	7	115	86
SHELDON POINT	1	0	0	0	0	0	1	0
SITKA	1578	751	37	889	626	94	1578	962
SKAGWAY	58	32	0	31	17	3	58	43
SOUTH MAKNEK	3	8	0	7	6	0	3	2
ST GEORGE ISLAND	8	1	0	7	6	0	8	2
ST PAUL ISLAND	12	8	0	5	4	2	12	10
TATTLEK	2	2	0	0	0	0	2	0
TELLER	44	31	1	18	11	2	44	37
TENAKEE SPRINGS	134	93	5	54	26	8	134	110
THORNE BAY	7	1	0	4	2	0	7	1

(continued)

Table 3. Sample Achievement, continued

Rural Community	First Mailing			Second Mailing			Third Mailing			Totals					
	Surveys Mailed	Surveys Returned	Surveys Undeliverable	Surveys Mailed	Surveys Returned	Surveys Undeliverable	Surveys Mailed	Surveys Returned	Surveys Undeliverable	SHARCs Issued	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
TOGIAK	3														
TOKSOOK BAY	3														
UNALASKA	116	59	2	50	11	0	43	10	0	116	80	0	80	69.0%	2
WHALE PASS	27	24	0	8	0	0	5	0	0	27	24	0	24	88.9%	0
WRANGELL	424	227	11	205	45	5	134	30	2	424	302	0	302	71.2%	18
YAKUTAT	63	32	2	32	2	2	27	7	0	63	41	0	41	65.1%	4
Rural Community Subtotals	7,869	4,153	200	4,151	681	91	2,744	457	57	7,869	5,291	154	5,445	69.2%	348
TRIBAL/RURAL GRAND TOTALS	14,306	5,824	381	8,973	1,180	155	6,739	828	77	14,306	7,832	733	8,565	59.9%	613

City of Residence	First Mailing			Second Mailing			Third Mailing			Totals					
	Surveys Mailed	Surveys Returned	Surveys Undeliverable	Surveys Mailed	Surveys Returned	Surveys Undeliverable	Surveys Mailed	Surveys Returned	Surveys Undeliverable	SHARCs Issued	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
ADAK	13	2	0	12	0	1	10	7	0	13	9	0	9	69.2%	1
AKHIOK	22	2	0	20	3	0	15	2	2	22	7	0	7	31.8%	2
AKUTAN	49	10	0	46	2	0	37	1	0	49	13	0	13	26.5%	0
ALEKNAGIK	4														
ANCHOR POINT	11	3	0	8	1	0	7	0	0	11	4	0	4	36.4%	0
ANCHORAGE	221	62	9	162	18	13	112	24	3	221	104	2	106	48.0%	25
ANGOON	172	42	0	137	17	3	109	13	0	172	72	0	72	41.9%	3
ATKA	12	2	0	12	2	0	8	0	0	12	4	0	4	33.3%	0
AUIKE BAY	2														
BETHEL	8	1	0	7	4	0	4	0	0	8	5	0	5	62.5%	0
BIG LAKE	2														
CHEFORNAK	20	1	0	19	2	0	15	2	0	20	5	10	15	75.0%	0
CHENEGA BAY	18	8	0	11	1	1	8	1	0	18	10	0	10	55.6%	1
CHEVAK	13	1	0	12	3	0	9	2	0	13	6	4	10	76.9%	0
CHIGNIK	31	14	1	20	7	0	8	1	0	31	22	0	22	71.0%	1
CHIGNIK LAGOON	42	21	0	21	1	0	16	4	0	42	26	0	26	61.9%	0
CHIGNIK LAKE	8	4	0	5	3	0	1	0	0	8	7	0	7	87.5%	0
CHINIAK	21	9	0	13	2	0	10	0	0	21	11	0	11	52.4%	0
CHUGIAK	7	4	0	3	2	0	1	0	0	7	6	0	6	85.7%	0
CLARKS POINT	4														
COFFMAN COVE	46	32	2	21	5	0	7	2	0	46	39	0	39	84.8%	2
COLD BAY	24	12	0	13	1	2	9	1	0	24	14	0	14	58.3%	2
COPPER CENTER	2														
CORDOVA	602	331	17	285	57	2	180	30	6	602	418	0	418	69.4%	25
CRAIG	499	268	10	275	37	1	202	21	4	499	326	0	326	65.3%	15
DELTA JUNCTION	3														
DILLINGHAM	62	38	0	25	2	0	21	8	0	62	40	0	48	77.4%	0
DOUGLAS	17	4	0	14	2	0	13	1	1	17	7	0	7	41.2%	1
DUTCH HARBOR	61	29	1	33	6	0	23	8	0	61	43	1	44	72.1%	1
EAGLE RIVER	12	2	0	10	0	0	8	4	0	12	6	0	6	50.0%	0
EDNA BAY	24	12	0	17	3	0	9	3	0	24	18	0	18	75.0%	0
EEK	21	4	0	17	4	0	13	0	0	21	8	3	11	52.4%	0
ELFIN COVE	20	13	0	11	1	0	6	0	0	20	14	0	14	70.0%	0
EXCURSION INLET	2														
FAIRBANKS	9	6	1	2	2	0	0	0	0	9	8	0	8	88.9%	1
FALSE PASS	10	2	1	8	2	0	5	0	0	10	4	0	4	40.0%	1
FRITZ CREEK	2														
GAMBELL	7	0	0	7	0	0	7	0	0	7	0	0	0	0.0%	0
GLENNALLEN	4														
GLOVIN	1														
GOODNEWS BAY	17	9	0	9	0	0	7	1	0	17	10	0	10	58.8%	0
GUSTAVUS	77	49	1	35	5	0	24	3	0	77	57	0	57	74.0%	1
HAINES	556	350	14	248	57	0	139	22	0	556	429	0	429	77.2%	14
HOLLIS	5														
HOMER	28	16	0	12	1	0	11	0	0	28	17	0	17	60.7%	0

(continued)

50

Table 3. Sample Achievement, continued

City of Residence	First Mailing			Second Mailing			Third Mailing			Totals					
	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	SHARCs Issued	Returned by Mail	Returned Through Staff	Response Rate	Response Rate	Undeliverable
HOONAH	334	121	2	227	35	2	175	19	1	334	175	0	175	52.4%	5
HOOPER BAY	93	11	0	83	12	0	66	5	0	93	26	34	62	66.7%	0
HYDABURG	186	48	5	136	4	0	128	16	0	186	68	106	174	93.5%	5
HYDER	39	12	0	29	13	0	16	5	0	39	30	0	30	76.9%	0
JUNEAU	419	122	20	299	34	11	238	24	4	419	180	1	181	43.2%	35
KAKE	163	56	10	110	20	0	79	13	0	163	89	0	89	54.6%	10
KALSKAG	1														
KARLUK	1														
KASAAN	19	10	0	10	2	0	7	0	0	19	12	0	12	63.2%	0
KASILOF	7	0	0	7	1	0	6	0	0	7	1	0	1	14.3%	0
KENAI	57	31	1	32	7	1	18	3	0	57	41	0	41	71.9%	2
KETCHIKAN	882	249	50	622	63	16	504	35	2	882	347	43	390	44.2%	68
KING COVE	61	24	0	41	5	1	31	7	0	61	36	0	36	59.0%	1
KING SALMON	4														
KIPNUK	87	7	0	79	3	0	77	1	0	87	11	30	41	47.1%	0
KLAWOCK	320	126	9	207	28	0	156	29	2	320	183	0	183	57.2%	11
KODIAK	1741	861	49	999	142	22	654	107	24	1741	1110	0	1110	63.8%	95
KONGIGANAK	13	2	0	11	3	0	9	0	0	13	5	2	7	53.8%	0
KWIGILLINGOK	45	2	0	43	1	0	42	0	0	45	3	15	18	40.0%	0
LARSEN BAY	39	19	0	20	4	0	14	9	1	39	32	0	32	82.1%	1
LOWER KALSKAG	2														
MANOKOTAK	2														
MARSHALL	1														
MCGRATH	4														
MEKORYUK	15	6	0	10	0	0	8	1	0	15	7	8	15	100.0%	0
METLAKATLA	414	89	8	326	29	2	281	24	5	414	142	0	142	34.3%	15
MEYERS CHUCK	14	6	0	10	4	0	5	0	0	14	10	0	10	71.4%	0
NAKNEK	10	4	0	6	2	0	5	0	0	10	6	0	6	60.0%	0
NANWALEK	37	12	1	25	0	0	24	0	0	37	12	0	12	32.4%	1
NAPAKIAK	3														
NAUKATI	11	7	0	5	1	0	3	1	1	11	9	0	9	81.8%	1
NELSON LAGOON	1														
NEWTOK	5														
NIGHTMUTE	31	1	0	30	1	0	28	1	0	31	3	12	15	48.4%	0
NIKISKI	7	1	0	6	1	0	5	0	0	7	2	0	2	28.6%	0
NIKOLSKI	18	3	0	17	1	0	14	1	0	18	5	0	5	27.8%	0
NINILCHIK	62	24	1	41	7	0	33	0	0	62	31	0	31	50.0%	1
NOME	15	5	0	11	0	0	10	0	0	15	5	0	5	33.3%	0
NORTH POLE	4														
NUNAPITCHUK	1														
OLD HARBOR	74	26	1	53	12	5	30	3	0	74	41	0	41	55.4%	6
OUZINKIE	43	19	2	22	3	0	18	3	0	43	25	0	25	58.1%	2
PALMER	4														
PELICAN	57	24	4	32	10	1	19	5	0	57	39	0	39	68.4%	5
PERRYVILLE	38	22	2	17	3	0	12	0	0	38	25	0	25	65.8%	2
PETERSBURG	1197	634	35	602	109	8	422	73	2	1197	816	0	816	68.2%	45
PLATINUM	1														
POINT BAKER	28	17	1	14	2	0	10	1	0	28	20	0	20	71.4%	1
PORT ALEXANDER	25	10	0	18	7	0	10	0	0	25	17	0	17	68.0%	0
PORT GRAHAM	52	8	1	44	7	2	34	1	0	52	16	0	16	30.8%	3
PORT HEIDEN	1														
PORT LIONS	84	34	0	60	13	0	38	7	0	84	54	0	54	64.3%	0
PORT PROTECTION	1														
PORT WILLIAM	1														
QUINHAGAK	16	5	0	15	2	0	9	0	0	16	7	3	10	62.5%	0
SAND POINT	321	76	8	247	33	2	200	12	1	321	121	0	121	37.7%	11
SAVOONGA	44	8	0	37	2	0	34	1	0	44	11	0	11	25.0%	0
SAXMAN	15	5	0	10	0	0	10	1	0	15	6	6	12	80.0%	0
SCAMMON BAY	7	1	0	6	0	0	6	1	0	7	2	2	4	57.1%	0
SELDOVIA	123	71	4	57	12	0	35	8	0	123	91	0	91	74.0%	4
SEWARD	10	1	0	9	0	1	8	1	0	10	2	0	2	20.0%	1
SHISHMAREF	1														
SITKA	1974	880	56	1157	136	23	855	134	13	1974	1150	189	1339	67.8%	92

[[continued]]

Table 3. Sample Achievement, continued

City of Residence	First Mailing			Second Mailing			Third Mailing			Totals					
	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	Surveys Mailed	Surveys Returned	Surveys Returned Undeliverable	SHARCs Issued	Returned by Mail	Returned through Staff	Response	Response Rate	Undeliverable
SKAGWAY	62	35	0	32	8	1	18	4	1	62	47	0	47	75.8%	2
SOLDOTNA	18	9	0	10	2	0	7	1	0	18	12	0	12	66.7%	0
SOUTH NAKNEK	3														
ST GEORGE ISLAND	32	5	0	27	1	0	26	0	0	32	6	1	7	21.9%	0
ST PAUL ISLAND	218	22	0	201	18	1	175	6	0	218	46	123	169	77.5%	1
STERLING	4														
TATITLEK	30	15	0	16	0	0	15	3	0	30	18	0	18	60.0%	0
TELLER	2														
TENAKEE SPRINGS	44	31	1	18	4	0	11	2	0	44	37	0	37	84.1%	1
THORNE BAY	134	93	6	52	9	1	26	7	0	134	109	0	109	81.3%	7
TOGIAK	10	2	0	9	2	0	5	2	0	10	6	0	6	60.0%	0
TOKSOOK BAY	522	27	2	496	7	0	486	12	0	522	46	102	148	28.4%	2
TRAPPER CREEK	2														
TUNUNAK	70	4	0	67	0	0	66	1	0	70	5	28	33	47.1%	0
TWIN HILLS	1														
UNALAKLEET	1														
UNALASKA	89	37	2	55	8	0	44	4	0	89	49	4	53	59.6%	2
VALDEZ	26	9	1	19	2	0	14	5	0	26	16	0	16	61.5%	1
WARD COVE	46	13	2	33	12	0	19	4	0	46	29	0	29	63.0%	2
WASILLA	28	12	1	17	0	1	12	2	0	28	14	0	14	50.0%	2
WHALE PASS	6	2	0	6	0	3	3	0	0	6	2	0	2	33.3%	3
WHITE MOUNTAIN	1														
WHITTIER	2														
WILLOW	1														
WRANGELL	530	281	15	255	57	6	165	35	2	530	373	0	373	70.4%	23
YAKUTAT	118	56	3	67	8	2	52	10	0	118	74	0	74	62.7%	5
Alaska Resident Subtotal	14076	5753	361	8828	1170	138	6626	817	75	14076	7740	733	8473	60.2%	574
Non-Alaska Resident Subtotal³	230	71	20	145	10	17	113	11	2	230	92	0	92	40.0%	39
RESIDENCE GRAND SUBTOTALS	14,306	5,824	381	8,973	1,180	155	6,739	828	77	14,306	7,832	733	8,565	59.9%	613

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

² SHARC = Subsistence halibut registration certificate.

³ Note that members of eligible Alaska tribes may obtain SHARCs regardless of place of residence. All non-Alaska resident SHARC holders were members of eligible tribes.

Table 4. Estimated Alaska Subsistence Harvests of Halibut, Sport Halibut Harvests by SHARC¹ Holders, and Incidental Harvests of Lingcod and Rockfish by SHARC Type and Regulatory Area of the Tribe or Rural Community of Registration by the SHARC Holder, 2005

SHARC ¹ Type	Halibut Regulatory Area	Return Rate			Subsistence Fished for Halibut		Subsistence Halibut Harvest		Sport Fished for Halibut		Sport Halibut Harvest		Lingcod Incidental Harvest		Rockfish Incidental Harvest	
		SHARCs Issued	Surveys Returned	Percent	Estimated Number of Fishers	Percent of SHARCs Issued	Estimated Number of Fish	Estimated Number of Pounds ³	Estimated Number	Percent of SHARCs	Estimated Number of Fish	Estimated Number of Pounds ³	Estimated Number of Fishers	Estimated Number of Fish	Estimated Number of Fishers	Estimated Number of Fish
Tribal ²	2C	3,436	1,690	49.2%	1,021	29.7%	9,699	246,746	500	14.6%	1,493	33,670	154	442	313	2,393
Tribal	3A	1,082	570	52.7%	453	41.9%	6,287	136,974	231	21.4%	974	20,399	78	249	118	1,251
Tribal	3B	494	212	42.9%	187	37.9%	2,112	36,949	51	10.3%	138	3,706	14	165	24	308
Tribal	4A	87	21	24.1%	73	83.8%	762	18,318	15	16.9%	5	183	6	11	25	72
Tribal	4B	5	4	80.0%	4	75.0%	24	516	0	0.0%	0	0	0	0	3	15
Tribal	4C	249	180	72.3%	30	12.2%	425	9,209	1	0.5%	5	336	3	9	4	141
Tribal	4D	48	11	22.9%	15	31.8%	99	5,813	0	0.0%	0	0	0	0	4	4
Tribal	4E	1,036	432	41.7%	250	24.2%	3,091	42,267	26	2.5%	202	4,136	14	43	5	21
Tribal	All	6,437	3,120	48.5%	2,035	31.6%	22,500	496,792	824	12.8%	2,817	62,430	268	920	494	4,206
Rural ²	2C	5,048	3,583	71.0%	2,197	43.5%	16,295	353,409	1,346	26.7%	5,939	120,250	413	898	729	5,469
Rural	3A	2,407	1,599	66.4%	1,204	50.0%	14,947	287,378	915	38.0%	5,019	104,210	166	434	283	2,281
Rural	3B	93	59	63.4%	50	53.6%	718	13,707	25	26.5%	181	3,059	7	71	14	101
Rural	4A	127	88	69.3%	69	54.3%	716	16,867	33	25.8%	139	3,466	6	19	14	252
Rural	4B	25	14	56.0%	6	24.0%	31	1,275	0	0.0%	0	0	0	0	8	73
Rural	4C	13	5	38.5%	6	42.3%	41	574	0	0.0%	0	0	0	0	0	0
Rural	4D	3	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0
Rural	4E	153	97	63.4%	55	35.7%	627	8,221	6	3.7%	0	0	1	13	2	12
Rural	All	7,869	5,445	69.2%	3,349	42.6%	33,375	681,430	2,310	29.4%	11,279	230,985	591	1,435	1,044	8,189
All ³	2C	8,484	5,273	62.2%	3,219	37.9%	25,993	600,155	1,846	21.8%	7,432	153,920	567	1,341	1,042	7,862
All	3A	3,489	2,169	62.2%	1,657	47.5%	21,234	424,352	1,146	32.8%	5,993	124,608	244	683	401	3,532
All	3B	587	271	46.2%	237	40.4%	2,830	50,656	76	12.9%	319	6,766	21	236	38	410
All	4A	214	109	50.9%	142	66.3%	1,479	35,185	47	22.2%	144	3,649	12	30	40	325
All	4B	30	18	60.0%	10	32.5%	55	1,791	0	0.0%	0	0	0	0	10	88
All	4C	262	185	70.6%	36	13.7%	466	9,783	1	0.5%	5	336	3	9	4	141
All	4D	51	11	21.6%	15	29.9%	99	5,813	0	0.0%	0	0	0	0	4	4
All	4E	1,189	529	44.5%	305	25.7%	3,719	50,488	31	2.6%	202	4,136	15	56	7	33
All	All	14,306	8,565	59.9%	5,621	39.3%	55,875	1,178,222	3,147	22.0%	14,096	293,415	862	2,355	1,544	12,395

¹ SHARC = Subsistence Halibut Registration Certificate

² "Tribal" = individuals who obtained SHARCs as member of an eligible tribe, sorted by location of tribal headquarters. "Rural" = individuals who obtained SHARCs as residents of an eligible rural community. "All" = sum of tribal and rural SHARC holders for a regulatory area based on location of tribal headquarters or rural residence. Because some SHARC holders may fish in regulatory areas other than the location of the area of their tribal headquarters or rural residence, area totals in this table differ slightly from those in Table 6, Table 7, and Table 9.

³ Pounds net (dressed) weight, = 75 percent of round (whole) weight.

Table 5. Age of Subsistence Halibut Registration Certificate Holders by SHARC Type, 2005

SHARC Type	Age in Years (Number of SHARC Holders)																				totals
	0 - 4	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 - 44	45 - 49	50 - 54	55 - 59	60 - 64	65 - 69	70 - 74	75 - 79	80 - 84	85 - 89	90 - 94	95 - 99	
Tribal	88 1.3%	239 3.7%	350 5.4%	433 6.6%	444 6.8%	412 6.3%	448 6.9%	600 9.2%	716 11.0%	722 11.1%	616 9.4%	467 7.1%	342 5.2%	267 4.1%	157 2.4%	78 1.2%	37 0.6%	13 0.2%	7 0.1%	1 0.0%	6,437
Rural	41 0.6%	116 1.6%	171 2.3%	247 3.4%	308 4.2%	420 5.8%	593 8.1%	725 10.0%	894 12.3%	1119 15.4%	1092 15.0%	875 12.0%	586 8.0%	338 4.6%	182 2.5%	100 1.4%	50 0.7%	9 0.1%	1 0.0%	2 0.0%	7,869
Grand Totals	129 0.9%	355 2.6%	521 3.8%	680 4.9%	752 5.4%	832 6.0%	1041 7.5%	1325 9.6%	1610 11.7%	1841 13.3%	1708 12.4%	1342 9.7%	928 6.7%	605 4.4%	339 2.5%	178 1.3%	87 0.6%	22 0.2%	8 0.1%	3 0.0%	14,306
Toksook Bay	12 2.2%	61 11.4%	88 16.5%	65 12.2%	41 7.7%	30 5.6%	42 7.9%	47 8.8%	37 6.9%	22 4.1%	20 3.7%	15 2.8%	25 4.7%	9 1.7%	4 0.7%	5 0.9%	1 0.2%	0 0.0%	2 0.4%	1 0.2%	527
Tribal, w/o Toksook Bay	76 1.3%	178 3.0%	262 4.4%	368 6.1%	403 6.7%	382 6.4%	406 6.8%	553 9.2%	679 11.3%	700 11.7%	596 9.9%	452 7.5%	317 5.3%	258 4.3%	153 2.6%	73 1.2%	36 0.6%	13 0.2%	5 0.1%	0 0.0%	5,910

Source: SHARC database, Restricted Access Management Program, NMFS, Juneau, as of 12/31/2005

Table 6. Estimated Alaska Subsistence Harvests of Halibut by Habitat Regulatory Area and Subarea Fished and by Gear Type, and Estimated Sport Harvests by SHARC Holders, 2005

Subarea	Habitat Regulatory Area	Number of SHARCs Fished ¹	Estimated Subsistence Harvest by Gear Type		Estimated Sport Harvest	
			Estimated Number Harvested	Estimated Pounds Harvested ²	Estimated Number Harvested	Estimated Pounds Harvested ²
Subtotal	2C	1,749	14,193	328,658	1,083	4,008
	2C	796	113,545	6,147	402	2,068
	2C	699	135,869	5,552	367	1,145
	2C	1,487	14,193	328,658	1,083	4,008
	2C	10,815	259,822	3,379	68,835	1,749
	2C	4,939	114,310	19,235	796	2,068
	2C	4,969	111,077	24,792	812	2,420
	2C	2,783	485,210	112,862	3,245	149,402
	2C	20,293	485,210	112,862	3,245	149,402
	2C	2,783	485,210	112,862	3,245	149,402
Subtotal	3A	1,749	14,193	328,658	1,083	4,008
	3A	812	113,545	6,147	402	2,068
	3A	699	135,869	5,552	367	1,145
	3A	1,487	14,193	328,658	1,083	4,008
	3A	10,815	259,822	3,379	68,835	1,749
	3A	4,939	114,310	19,235	796	2,068
	3A	4,969	111,077	24,792	812	2,420
	3A	2,783	485,210	112,862	3,245	149,402
	3A	20,293	485,210	112,862	3,245	149,402
	3A	2,783	485,210	112,862	3,245	149,402
Subtotal	3B	227	48,225	2,617	1,976	34
	3B	145	31,442	1,976	1,451	202
	3B	57	16,783	640	1,451	21
	3B	100	48,225	2,617	1,976	34
	3B	1,372	22,240	1,245	227	318
	3B	1,053	14,975	925	1,451	202
	3B	725	7,518	83	640	21
	3B	14,975	16,467	145	1,976	34
	3B	22,240	23,985	2,277	2,617	55
	3B	1,372	22,240	1,245	2,617	318
Subtotal	4A	140	33,882	1,464	1,734	41
	4A	14	51	14	1,734	0
	4A	73	1,464	140	1,734	117
	4A	153	35,615	1,515	1,734	41
	4A	11,240	24,376	153	1,515	117
	4A	99	22,642	140	1,464	117
	4A	14	51	14	1,734	0
	4A	11,240	24,376	153	1,515	117
	4A	11,240	24,376	153	1,515	117
	4A	11,240	24,376	153	1,515	117
Subtotal	4B	8	1,351	41	1,351	2
	4B	0	0	0	0	0
	4B	5	1,351	41	1,351	2
	4B	23	350	8	1,351	2
	4B	1,001	350	8	1,351	2
	4B	4	350	8	1,351	2
	4B	18	350	8	1,351	2
	4B	18	350	8	1,351	2
	4B	4	350	8	1,351	2
	4B	1,001	350	8	1,351	2
Subtotal	4C	16	2,145	105	2,145	0
	4C	19	301	19	301	0
	4C	11	5,571	19	5,571	0
	4C	16	2,145	105	2,145	0
	4C	19	301	19	301	0
	4C	11	5,571	19	5,571	0
	4C	16	2,145	105	2,145	0
	4C	19	301	19	301	0
	4C	11	5,571	19	5,571	0
	4C	16	2,145	105	2,145	0
Subtotal	4D	16	5,848	107	5,848	0
	4D	0	0	0	0	0
	4D	15	5,848	107	5,848	0
	4D	99	5,813	35	5,813	0
	4D	0	0	0	0	0
	4D	15	5,848	107	5,848	0
	4D	99	5,813	35	5,813	0
	4D	0	0	0	0	0
	4D	15	5,848	107	5,848	0
	4D	99	5,813	35	5,813	0
Subtotal	4E	23	2,169	84	2,169	4
	4E	26	3,680	275	3,680	0
	4E	9	0	9	0	0
	4E	23	2,169	84	2,169	4
	4E	26	3,680	275	3,680	0
	4E	9	0	9	0	0
	4E	23	2,169	84	2,169	4
	4E	26	3,680	275	3,680	0
	4E	9	0	9	0	0
	4E	23	2,169	84	2,169	4
Subtotal	4F	308	54,119	3,764	54,119	17
	4F	9	0	9	0	2
	4F	275	51,950	3,680	51,950	11
	4F	308	54,119	3,764	54,119	17
	4F	9	0	9	0	2
	4F	275	51,950	3,680	51,950	11
	4F	308	54,119	3,764	54,119	17
	4F	9	0	9	0	2
	4F	275	51,950	3,680	51,950	11
	4F	308	54,119	3,764	54,119	17
Subtotal	4G	308	54,119	3,764	54,119	17
	4G	9	0	9	0	2
	4G	275	51,950	3,680	51,950	11
	4G	308	54,119	3,764	54,119	17
	4G	9	0	9	0	2
	4G	275	51,950	3,680	51,950	11
	4G	308	54,119	3,764	54,119	17
	4G	9	0	9	0	2
	4G	275	51,950	3,680	51,950	11
	4G	308	54,119	3,764	54,119	17
Subtotal	4H	308	54,119	3,764	54,119	17
	4H	9	0	9	0	2
	4H	275	51,950	3,680	51,950	11
	4H	308	54,119	3,764	54,119	17
	4H	9	0	9	0	2
	4H	275	51,950	3,680	51,950	11
	4H	308	54,119	3,764	54,119	17
	4H	9	0	9	0	2
	4H	275	51,950	3,680	51,950	11
	4H	308	54,119	3,764	54,119	17
Subtotal	4I	308	54,119	3,764	54,119	17
	4I	9	0	9	0	2
	4I	275	51,950	3,680	51,950	11
	4I	308	54,119	3,764	54,119	17
	4I	9	0	9	0	2
	4I	275	51,950	3,680	51,950	11
	4I	308	54,119	3,764	54,119	17
	4I	9	0	9	0	2
	4I	275	51,950	3,680	51,950	11
	4I	308	54,119	3,764	54,119	17
Subtotal	4J	308	54,119	3,764	54,119	17
	4J	9	0	9	0	2
	4J	275	51,950	3,680	51,950	11
	4J	308	54,119	3,764	54,119	17
	4J	9	0	9	0	2
	4J	275	51,950	3,680	51,950	11
	4J	308	54,119	3,764	54,119	17
	4J	9	0	9	0	2
	4J	275	51,950	3,680	51,950	11
	4J	308	54,119	3,764	54,119	17
Subtotal	4K	308	54,119	3,764	54,119	17
	4K	9	0	9	0	2
	4K	275	51,950	3,680	51,950	11
	4K	308	54,119	3,764	54,119	17
	4K	9	0	9	0	2
	4K	275	51,950	3,680	51,950	11
	4K	308	54,119	3,764	54,119	17
	4K	9	0	9	0	2
	4K	275	51,950	3,680	51,950	11
	4K	308	54,119	3,764	54,119	17
Subtotal	4L	308	54,119	3,764	54,119	17
	4L	9	0	9	0	2
	4L	275	51,950	3,680	51,950	11
	4L	308	54,119	3,764	54,119	17
	4L	9	0	9	0	2
	4L	275	51,950	3,680	51,950	11
	4L	308	54,119	3,764	54,119	17
	4L	9	0	9	0	2
	4L	275	51,950	3,680	51,950	11
	4L	308	54,119	3,764	54,119	17
Subtotal	4M	308	54,119	3,764	54,119	17
	4M	9	0	9	0	2
	4M	275	51,950	3,680	51,950	11
	4M	308	54,119	3,764	54,119	17
	4M	9	0	9	0	2
	4M	275	51,950	3,680	51,950	11
	4M	308	54,119	3,764	54,119	17
	4M	9	0	9	0	2
	4M	275	51,950	3,680	51,950	11
	4M	308	54,119	3,764	54,119	17
Subtotal	4N	308	54,119	3,764	54,119	17
	4N	9	0	9	0	2
	4N	275	51,950	3,680	51,950	11
	4N	308	54,119	3,764	54,119	17
	4N	9	0	9	0	2
	4N	275	51,950	3,680	51,950	11
	4N	308	54,119	3,764	54,119	17
	4N	9	0	9	0	2
	4N	275	51,950	3,680	51,950	11
	4N	308	54,119	3,764	54,119	17
Subtotal	4O	308	54,119	3,764	54,119	17
	4O	9	0	9	0	2
	4O	275	51,950	3,680	51,950	11
	4O	308	54,119	3,764	54,119	17
	4O	9	0	9	0	2
	4O	275	51,950	3,680	51,950	11
	4O	308	54,119	3,764	54,119	17
	4O	9	0	9	0	2
	4O	275	51,950	3,680	51,950	11
	4O	308	54,119	3,764	54,119	17
Subtotal	4P	308	54,119	3,764	54,119	17
	4P	9	0	9	0	2
	4P	275	51,950	3,680	51,950	11
	4P	308	54,119	3,764	54,119	17
	4P	9	0	9	0	2
	4P	275	51,950	3,680	51,950	11
	4P	308	54,119	3,764	54,119	17
	4P	9	0	9	0	2
	4P	275	51,950	3,680	51,950	11
	4P	308	54,119			

Table 7. Alaska Subsistence Halibut harvests in 2003, 2004, and 2005 by Geographic Area Fished

	Subsistence Halibut Harvests, Net Lbs			% Change between Years			Percentage of State Total		
	2003	2004	2005	2003 to 2004	2004 to 2005	2003 to 2005	2003	2004	2005
Southern Southeast Alaska	290,443	369,319	328,658	27.2%	-11.0%	13.2%	27.9%	31.0%	27.9%
Northern Southeast Alaska	159,772	160,453	135,869	0.4%	-15.3%	-15.0%	15.3%	13.4%	11.5%
Sitka LAMP Area	173,323	147,312	133,545	-15.0%	-9.3%	-23.0%	16.6%	12.3%	11.3%
Area 2C Subtotal	623,538	677,084	598,072	8.6%	-11.7%	-4.1%	59.9%	56.7%	50.8%
Yakutat Area	11,198	20,153	36,515	80.0%	81.2%	226.1%	1.1%	1.7%	3.1%
Prince William Sound	28,409	58,429	68,063	105.7%	16.5%	139.6%	2.7%	4.9%	5.8%
Cook Inlet	52,609	83,939	79,024	59.6%	-5.9%	50.2%	5.1%	7.0%	6.7%
Kodiak Island Road System	114,028	129,145	134,849	13.3%	4.4%	18.3%	11.0%	10.8%	11.4%
Kodiak Island Other	79,256	111,944	110,824	41.2%	-1.0%	39.8%	7.6%	9.4%	9.4%
Area 3A Subtotal	285,500	403,610	429,275	41.4%	6.4%	50.4%	27.4%	33.8%	36.4%
Chignik Area	10,500	12,053	14,783	14.8%	22.7%	40.8%	1.0%	1.0%	1.3%
Lower Alaska Peninsula	16,977	21,467	31,442	26.4%	46.5%	85.2%	1.6%	1.8%	2.7%
Area 3B Subtotal	27,477	33,519	46,225	22.0%	37.9%	68.2%	2.6%	2.8%	3.9%
Eastern Aleutians - East	19,345	26,715	33,882	38.1%	26.8%	75.1%	1.9%	2.2%	2.9%
Eastern Aleutians - West	1,852	2,162	1,734	16.7%	-19.8%	-6.4%	0.2%	0.2%	0.1%
Area 4A Subtotal	21,197	28,877	35,615	36.2%	23.3%	68.0%	2.0%	2.4%	3.0%
Western Aleutians - East	2,582	916	1,351	-64.5%	47.5%	-47.7%	0.2%	0.1%	0.1%
Western Aleutians - Other	0	0	0				0.0%	0.0%	0.0%
Area 4B Subtotal	2,582	916	1,351	-64.5%	47.5%	-47.7%	0.2%	0.1%	0.1%
St. George Island	2,042	1,823	2,145	-10.7%	17.7%	5.0%	0.2%	0.2%	0.2%
St. Paul Island	20,839	7,911	5,571	-62.0%	-29.6%	-73.3%	2.0%	0.7%	0.5%
Area 4C Subtotal	22,881	9,734	7,716	-57.5%	-20.7%	-66.3%	2.2%	0.8%	0.7%
St. Lawrence Island	4,380	10,923	5,848	149.4%	-46.5%	33.5%	0.4%	0.9%	0.5%
Area 4D, Other	0	0	0				0.0%	0.0%	0.0%
Area 4D Subtotal	4,380	10,923	5,848	149.4%	-46.5%	33.5%	0.4%	0.9%	0.5%
Bristol Bay	435	203	2,169	-53.3%	967.2%	398.6%	0.0%	0.0%	0.2%
YK Delta	53,284	28,298	51,950	-46.9%	83.6%	-2.5%	5.1%	2.4%	4.4%
Norton Sound	56	0	0	-100.0%		-100.0%	0.0%	0.0%	0.0%
Area 4E Subtotal	53,775	28,501	54,119	-47.0%	89.9%	0.6%	5.2%	2.4%	4.6%
Alaska grand totals¹	1,041,330	1,193,162	1,178,222	14.6%	-1.3%	13.1%	100.0%	100.0%	100.0%

¹ The sum of the harvests by geographic areas for 2003 reported here differs slightly from that reported in Table 8 in Fall et al (2004:50) due to rounding.

Table B. Number of Hooks Usually Fished, Setline (Stationary) Gear, Alaska Halibut Subsistence Fishery, 2005

Regulatory Area	SHARC holders	Number of Hooks ¹																														Grand Total ²
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	
2C	8,484	22	22	11	15	37	25	1	14	6	219	0	52	8	6	197	2	0	14	4	4	548	5	5	23	215	4	15	27	23	1,193	56
		0.8%	0.8%	0.4%	0.6%	1.3%	0.9%	0.0%	0.5%	0.2%	7.9%	0.0%	1.9%	0.3%	0.2%	7.1%	0.1%	0.0%	0.5%	0.1%	19.7%	0.2%	0.2%	0.2%	0.8%	7.8%	0.2%	0.5%	1.0%	0.8%	43.0%	2.1%
3A	3,489	16	6	4	4	15	12	6	8	1	97	0	38	0	0	74	3	1	1	0	273	3	0	9	101	1	1	18	1	476	17	
		1.3%	0.5%	0.3%	0.3%	1.2%	1.1%	0.5%	0.7%	0.1%	7.8%	0.0%	3.2%	0.0%	0.0%	6.2%	0.2%	0.1%	0.1%	0.0%	23.1%	0.3%	0.0%	0.0%	0.8%	8.6%	0.1%	0.1%	1.5%	0.1%	40.3%	2.3%
3B	587	10	3	0	0	3	1	0	2	4	9	0	3	0	0	9	0	0	0	0	20	0	0	0	5	0	0	0	0	41	0	
		9.4%	2.9%	0.0%	0.0%	2.9%	1.3%	0.0%	1.4%	3.2%	7.9%	0.0%	2.9%	0.0%	0.0%	7.8%	0.0%	0.0%	0.0%	18.4%	0.0%	0.0%	0.0%	0.0%	4.9%	0.0%	0.0%	0.0%	0.0%	37.1%	0.0%	
4A	214	1	0	0	0	0	0	0	0	0	6	0	0	0	0	11	0	0	0	0	4	0	0	1	10	0	0	0	4	25	4	
		2.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	8.4%	0.0%	0.0%	0.0%	0.0%	16.1%	0.0%	0.0%	0.0%	6.6%	0.0%	0.0%	0.0%	2.0%	15.6%	0.0%	0.0%	0.0%	6.1%	37.4%	8.8%	
4B	30	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	1	
		47.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.7%	0.0%	0.0%	0.0%	0.0%	26.5%	8.3%	
4C	262	1	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	13	0	
		6.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.9%	0.0%	0.0%	6.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.9%	0.0%	0.0%	0.0%	0.0%	72.4%	0.0%	
4D	51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0	0	8	0	0	0	4	0	0	0	0	0	0	
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.2%	0.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	25.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
4E	1,189	8	0	0	0	1	0	0	0	0	2	0	0	0	0	2	0	0	0	0	5	0	0	0	4	0	0	0	0	37	1	
		12.9%	0.0%	0.0%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%	3.6%	0.0%	0.0%	0.0%	0.0%	3.3%	0.0%	0.0%	0.0%	8.1%	0.0%	0.0%	0.0%	6.7%	0.0%	0.0%	0.0%	0.0%	62.0%	1.3%		
Alaska	14,306	62	31	15	20	55	40	7	24	11	329	0	93	9	6	296	5	1	15	4	856	8	5	33	343	6	16	44	28	1,787	79	
		1.5%	0.7%	0.4%	0.5%	1.3%	0.9%	0.2%	0.6%	0.3%	7.8%	0.0%	2.2%	0.2%	0.1%	7.0%	0.1%	0.0%	0.4%	0.1%	20.2%	0.2%	0.1%	0.1%	8.1%	0.1%	0.4%	1.0%	0.7%	42.2%	1.9%	

¹ Number of fishers using setline (fixed) gear. Based on location of tribe or rural community of SHARC holder.

² The column for 30 hooks includes those fishers who reported using more than 30. There is no 30-hook limit in Areas 4C, 4D, or 4E.

Table 9. Average Net Weight of Subsistence and Sport Harvested Halibut, 2005, by Regulatory Area Fished

Area ²	Subsistence Methods			Sport Harvest ¹			Total Halibut		
	Number	Pounds, Net Weight	Average per fish	Number	Pounds, Net Weight	Average per fish	Number	Pounds, Net Weight	Average per fish
2C	25,893	598,072	23.1	7,222	149,402	20.7	33,115	747,474	22.6
3A	21,531	429,275	19.9	6,419	133,276	20.8	27,950	562,551	20.1
3B	2,617	46,225	17.7	318	6,844	21.5	2,935	53,069	18.1
4A	1,515	35,615	23.5	117	2,712	23.2	1,632	38,327	23.5
4B	41	1,351	33.0	0	0		41	1,351	33.0
4C	405	7,716	19.1	0	0		405	7,716	19.1
4D	107	5,848	54.7	0	0		107	5,848	54.7
4E	3,764	54,119	14.4	20	1,181	59.1	3,784	55,300	14.6
Alaska	55,875	1,178,222	21.1	14,096	293,415	20.8	69,969	1,471,636	21.0

¹ Sport harvest of halibut by SHARC holders.

² Area totals are based on the location of the harvest (see also Table 6 and Table 7).

Source: Alaska Department of Fish and Game, Division of Subsistence, SHARC Survey, 2006

Table 10. Estimated Harvests of Lingcod and Rockfish by SHARC Holders while Subsistence Fishing for Halibut, by Regulatory Area and Geographic Subarea Fished, 2005

Subarea	Regulatory Area	Number of SHARCs Fished	Estimated Harvest			
			Lingcod		Rockfish	
			Estimated Number Fished	Estimated Number Harvested	Estimated Number Fished	Estimated Number Harvested
Southern Southeast Alaska	2C	1,749	239	545	549	4,334
Sitka LAMP Area	2C	796	284	642	366	2,422
Northern Southeast Alaska	2C	812	74	123	188	1,009
Area 2C Subtotal	2C	3,245	568	1,311	1,047	7,764
Yakutat Area	3A	82	44	200	31	195
Prince William Sound	3A	363	57	103	108	792
Cook Inlet	3A	210	45	129	73	679
Kodiak Island Road System	3A	656	83	204	142	1,141
Kodiak Island Other	3A	541	62	99	114	830
Area 3A Subtotal	3A	1,714	268	735	426	3,638
Chignik Area	3B	83	5	5	14	77
Lower Alaska Peninsula	3B	145	17	228	26	307
Area 3B Subtotal	3B	227	21	233	39	384
Eastern Aleutians - East	4A	140	12	30	42	337
Eastern Aleutians - West	4A	14	0	0	0	0
Area 4A Subtotal	4A	153	12	30	42	337
Western Aleutians - East	4B	8	0	0	11	94
Area 4B Subtotal	4B	8	0	0	11	94
St. George Island	4C	16	0	0	0	0
St. Paul Island	4C	19	3	9	4	141
Area 4C Subtotal	4C	32	3	9	4	141
St. Lawrence Island	4D	16	0	0	4	4
Area 4D Subtotal	4D	16	0	0	4	4
Bristol Bay	4E	23	2	1	2	3
Yukon/Kuskokwim Delta	4E	275	6	37	4	28
Norton Sound	4E	9	0	0	0	0
Area 4E Subtotal	4E	308	8	38	6	31
Alaska Grand Total ¹	Alaska	5,621	862	2,355	1,544	12,395

¹ Because fishers might fish in more than one area, subtotals for regulatory areas and the state total might exceed the sum of the subarea values.

Source: Alaska Department of Fish and Game, Division of Subsistence, SHARC Survey, 2006

Table 11. Estimated Harvests of Halibut by Gear Type and Participation Subsistence and Sport Fisheries, Selected Alaska Communities, 2003, 2004, and 2005¹

Community	Year	Number of SHARC Holders ²	Subsistence Harvests						Sport Harvest ⁴		All Harvests	
			Setline (fixed) Gear		Hand-Operated Gear		Total Subsistence Harvest		Estimated Number Fished	Estimated Pounds Harvested	Estimated Number Fished	Estimated Pounds Harvested
			Estimated Number Fished	Estimated Pounds Harvested	Estimated Number Fished	Estimated Pounds Harvested	Estimated Number Fished	Estimated Pounds Harvested				
Cordova	2003	358	68	7,613	40	7,885	102	15,498	144	11,534	194	27,032
	2004	526	174	29,693	97	10,946	262	40,640	174	12,149	325	52,789
	2005	602	238	34,907	104	12,234	281	47,141	179	10,519	358	57,660
Kodiak	2003	1,320	438	101,575	278	51,678	646	153,254	498	68,170	858	221,424
	2004	1,561	554	131,719	335	55,605	802	187,214	581	73,181	971	260,395
	2005	1,741	650	146,781	398	64,047	871	210,828	669	82,455	1,116	293,283
Petersburg	2003	1,047	330	41,704	138	14,013	415	55,718	268	19,611	523	75,329
	2004	1,187	322	53,885	206	17,900	482	71,784	351	26,408	617	98,192
	2005	1,197	338	44,050	175	17,321	436	61,372	312	23,289	569	84,661
Port Graham	2003	52	10	4,398	28	7,056	35	11,454	3	156	36	11,610
	2004	57	15	4,425	31	4,755	42	9,181	11	850	42	10,031
	2005	52	8	7,938	18	3,190	18	11,127	9	488	18	11,615
Sand Point	2003	73	15	3,409	11	1,410	21	4,819	11	410	21	5,229
	2004	351	25	4,360	74	6,996	109	11,355	50	1,384	121	12,739
	2005	321	35	12,201	77	9,700	100	21,901	23	1,281	105	23,182
Sitka	2003	1,639	760	155,276	160	19,604	821	174,880	401	32,408	956	207,288
	2004	1,871	714	151,660	147	14,739	904	166,474	412	25,829	1,026	192,303
	2005	1,974	738	126,426	172	19,893	814	146,319	417	55,913	987	202,232
Toksook Bay	2003	532	8	3,790	47	20,709	54	24,500	0	0	54	24,500
	2004	529	7	859	44	5,737	56	6,596	0	0	56	6,596
	2005	522	5	602	60	14,269	61	14,870	2	98	62	14,968
Tununak	2003	0										
	2004	70	16	878	23	1,076	31	1,954	0	0	31	1,954
	2005	70	3	332	18	2,329	20	2,661	0	0	20	2,661
Unalaska ³	2003	92	39	6,713	31	4,146	50	10,860	33	5,519	70	16,379
	2004	131	43	9,557	39	5,973	81	15,530	34	2,165	93	17,695
	2005	150	60	9,573	57	8,535	88	18,108	28	2,439	97	20,547

¹ For data on all communities for 2005, see Appendix Tables A-4, A-5, and A-6

² SHARC = Subsistence halibut registration certificate; includes all SHARC holders living in the community

³ Includes Dutch Harbor

⁴ Sport harvests by SHARC holders only.

Source: Alaska Department of Fish and Game, Division of Subsistence SHARC Survey, 2004, 2005, & 2006

Table 12. Estimated Harvests of Halibut for Home Use, Sitka

Year	Number of Fishing Households	Pounds Usable (Net) Weight					Total w/o Commercial Removal	95% confidence range (+/-%) ²
		Removed from Commercial Harvests	Rod and Reel	Other Methods ¹	Total			
1987	1,252	12,353	180,982			193,335	180,982	22
1996	943	16,528	135,048	14,196		165,772	149,244	28
Annual average	1,098	14,441	158,015	14,196		179,554	165,113	

¹ Harvest data not collected for "other methods" in 1987.

² Pertains to estimate of total harvests.

Source: Scott et al. 2001

Table 13. Estimated Harvests of Halibut for Home Use, Petersburg

Year	Number of Fishing Households	Pounds Usable (Net) Weight				Total w/o Commercial Removal	95% confidence range (+/-%) ²
		Removed from Commercial Harvests	Rod and Reel	Other Methods ¹	Total		
1987	604	11,728	107,448		119,176	107,448	51
2000	468	6,951	49,023	0	55,974	49,023	39
Annual average	536	9,339	78,236	0	87,575	78,236	

¹ Harvest data not collected for "other methods" in 1987.

² Pertains to estimate of total harvests.

Source: Scott et al. 2001; Division of Subsistence, ADF&G, Household Survey, 2001

Table 14. Estimated Harvests of Halibut for Home Use, Cordova

Year	Number of Fishing Households	Pounds Usable (Net) Weight				Total w/o Commercial Removal	95% confidence range (+/-%) ¹
		Removed from Commercial Harvests	Rod and Reel	Other Methods	Total		
1985	228	3,776	31,002	1,752	36,530	32,754	29
1988	343	18,701	119,873	348	138,922	120,221	62
1991	272	25,107	25,493	116	50,716	25,609	33
1992	401	11,383	60,612	0	71,995	60,612	48
1993	382	3,762	39,556	2,056	45,374	41,612	32
1997	321	3,551	58,647	4,252	66,450	62,899	41
Annual average	325	11,047	55,864	1,421	68,331	57,285	

¹ Pertains to estimate of total harvests.

Source: Scott et al. 2001

Table 15. Estimated Harvests of Halibut for Home Use, Port Graham

Year	Number of Fishing Households	Pounds Usable (Net) Weight					Total w/o Commercial Removal	95% confidence range (+/-%) ²
		Removed from Commercial Harvests	Rod and Reel	Other Methods	Total			
1987	42	1,237	3,809	3,389	8,435	7,198	14	
1989	29	3,217	1,482	1,222	5,921	2,704	47	
1990	32	3,003	4,106	3,171	10,280	7,277	22	
1991	35	1,663	2,332	4,846	8,841	7,178	17	
1992	42	24	7,867	3,365	11,256	11,232	14	
1993	42	86	3,105	1,346	4,537	4,451	14	
1997	36	79	2,881	5,326	8,286	8,207	28	
Annual average ¹	38	1,015	4,017	3,574	8,606	7,591		

¹ Excludes 1989, the year of the *Exxon Valdez* Oil Spill

² Pertains to estimate of total harvests.

Source: Scott et al. 2001

Table 16. Estimated Harvests of Halibut for Home Use, Kodiak Road System¹

Year	Number of Fishing Households	Pounds Usable (Net) Weight					Total w/o Commercial Removal	95% confidence range (+/-%) ²
		Removed from Commercial Harvests	Rod and Reel	Other Methods	Total			
1982	1,404	NA	NA	NA	451,223	360,113	45	
1991	1,178	48,245	206,692	40,591	295,528	247,283	30	
1992	1,178	89,625	329,345	18,732	437,702	348,077	33	
1993	1,336	142,108	479,391	31,863	653,362	511,254	33	
Annual average	1,306	93,326	338,476	30,395	462,197	366,682		

¹ Harvest data are available based on random samples drawn from the entire road system population for 1982 and 1991. Just Kodiak City was sampled in 1992 and 1993. Estimates for the entire road system population were developed for this table based on the known portion of the total road system harvest harvested by city residents in 1982 and 1991.

² Pertains to estimate of total harvests.

Source: Scott et al. 2001

Table 17. Halibut Removals in Alaska by Regulatory Area, 2005

Area	Pounds Net Weight					
	Commercial ¹	Sport ²	Subsistence ³	Wastage	Bycatch	Total
2C	10,625,000	2,544,000	598,072	266,000	340,000	14,373,072
3A	26,033,000	5,437,000	429,275	728,000	3,130,000	35,757,275
3B	13,171,000	6,000	46,225	576,000	1,125,000	14,924,225
4	8,860,000	37,000	127,870	239,000	6,847,000	16,110,870
Alaska	58,689,000	8,024,000	1,201,442	1,809,000	11,442,000	81,165,442

¹ Commercial catch includes IPHC research catch and in Area 2C, the Metlakatla fishery catch.

² Projected harvests

³ Includes 23,221 pounds of sublegal halibut legally retained by CDQ organizations in areas 4D and 4E for personal use. The subsistence harvest by SHARC holders was 1,178,222 pounds, including 104,649 pounds in Area 4.

Sources: Gilroy, pers. Comm., 9/18/06 & 11/9/06; Division of Subsistence, ADF&G, SHARC Survey, 2006

Table 18. Comparison of Selected SHARC Survey Results, 2003, 2004, and 2005 Study Years

	Study Years			% Change		
	2003	2004	2005	2004 Compared to 2003	2005 Compared to 2004	2005 Compared to 2003
<u>Response to Survey</u>						
Number of SHARCs Issued	11,635	13,813	14,306	18.7%	3.6%	23.0%
Number of Surveys Returned	7,593	8,524	8,565	12.3%	0.5%	12.8%
Response Rate	65.3%	61.7%	59.9%	-5.4%	-3.0%	-8.3%
<u>Subsistence Halibut Fishing</u>						
Estimated Number of Subsistence Halibut Fishers	4,942	5,984	5,621	21.1%	-6.1%	13.7%
Percent of All SHARC Holders Subsistence Fishing	42.5%	43.3%	39.3%	2.0%	-9.3%	-7.5%
Estimated Number of Subsistence Halibut	43,926	52,412	55,875	19.3%	6.6%	27.2%
Estimated Net Pounds of Subsistence Halibut	1,041,330	1,193,162	1,178,222	14.6%	-1.3%	13.1%
Average Weight of Subsistence-Harvested Halibut	23.7	22.8	21.1	-4.0%	-7.3%	-11.0%
Average Harvest per Fisher, Fish	8.9	8.8	9.9	-1.5%	13.5%	11.8%
Average Harvest per Fisher, Net Pounds	210.7	199.4	209.6	-5.4%	5.1%	-0.5%
<u>Sport Halibut Fishing by SHARC Holders</u>						
Estimated Number of Sport Halibut Fishers	2,580	3,107	3,147	20.4%	1.3%	22.0%
Estimated Number of Sport Halibut	10,784	12,530	14,096	16.2%	12.5%	30.7%
Estimated Net Pounds of Sport Halibut	245,947	251,092	293,415	2.1%	16.9%	19.3%
Average Weight of Sport-Harvested Halibut	22.8	20.0	20.8	-12.1%	3.8%	-8.8%
Average Harvest per Fisher, Fish	4.2	4.0	4.5	-3.5%	11.1%	7.2%
Average Harvest per Fisher, Net Pounds	95.3	80.8	93.2	-15.2%	15.4%	-2.2%
<u>Total Number of Halibut Fishers</u>						
Estimated Number of Fishers, Subsistence or Sport	5,941	6,980	6,876	17.5%	-1.5%	15.7%
Percent of Total SHARC Holders who Fished	51.1%	50.5%	48.1%	-1.0%	-4.9%	-5.9%
<u>Incidental Rockfish Harvests</u>						
Number of Rockfish Harvesters	1,239	1,616	1,544	30.4%	-4.5%	24.6%
Percent of all SHARC Holders	10.6%	11.7%	10.8%	9.9%	-7.7%	1.4%
Percent of all Subsistence Halibut Fishers	25.1%	27.0%	27.5%	7.7%	1.7%	9.6%
Number of Rockfish Harvested	14,870	19,001	12,395	27.8%	-34.8%	-16.6%
Average Number of Rockfish Harvested, All Subsistence Halibut Fishers	3.0	3.2	2.2	5.5%	-30.6%	-26.7%
Average Number of Rockfish Harvested, Subsistence Halibut Fishers who Harvested Rockfish	12.0	11.8	8.0	-2.0%	-31.7%	-33.1%
<u>Incidental Lingcod Harvests</u>						
Number of Lingcod Harvesters	699	953	862	36.3%	-9.5%	23.3%
Percent of all SHARC Holders	6.0%	6.9%	6.0%	14.8%	-12.7%	0.3%
Percent of all Subsistence Halibut Fishers	14.1%	15.9%	15.3%	12.6%	-3.7%	8.4%
Number of Lingcod Harvested	3,298	4,407	2,355	33.6%	-46.6%	-28.6%
Average Number of Lingcod Harvested, All Subsistence Halibut Fishers	0.7	0.7	0.4	10.4%	-43.1%	-37.2%
Average Number of Lingcod Harvested, Subsistence Halibut Fishers who Harvested Lingcod	4.7	4.6	2.7	-2.0%	-40.9%	-42.1%

REPORT FIGURES

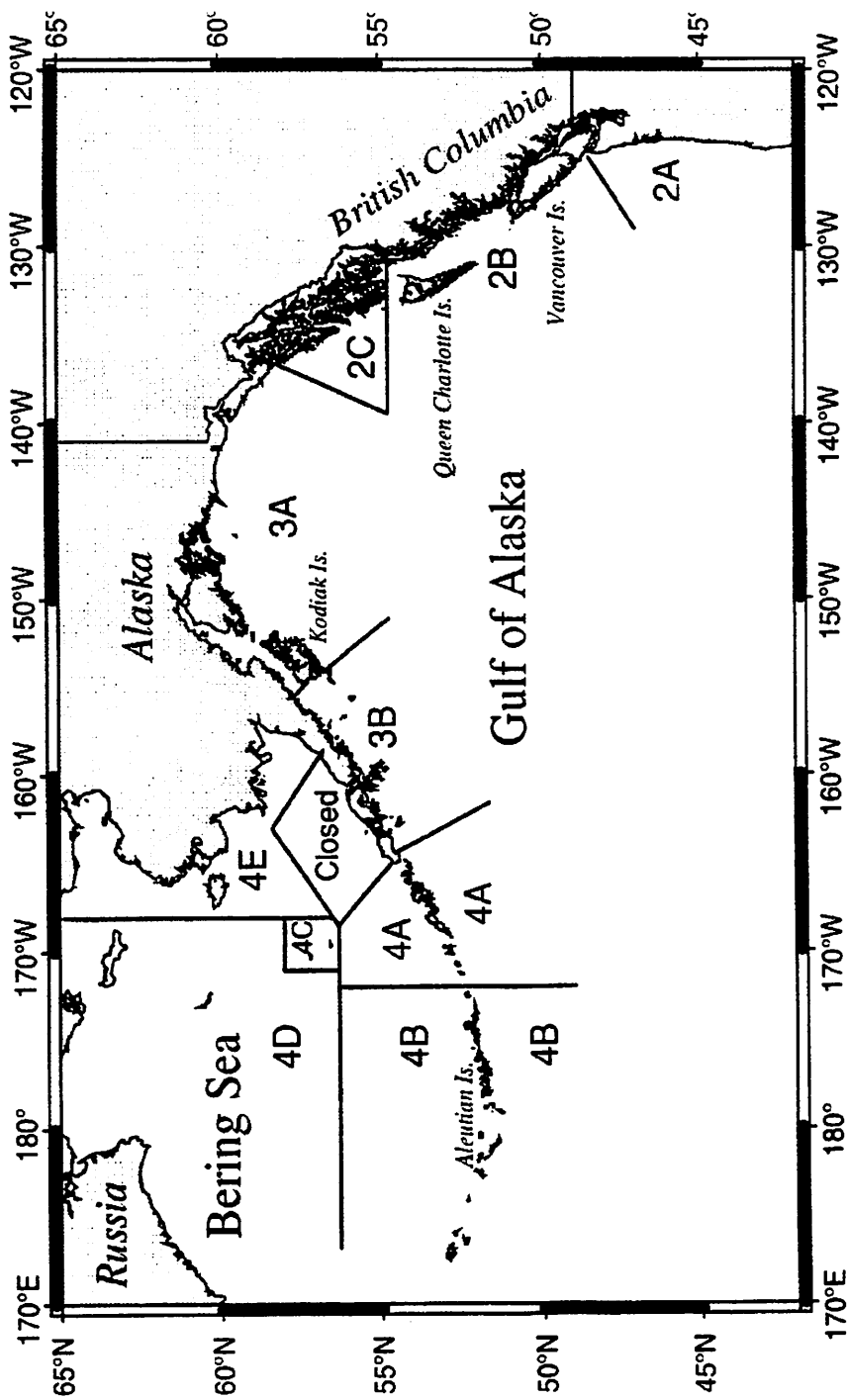


Figure 1. Regulatory areas for the Pacific halibut fishery.

Figure 2. Number of Surveys Returned and Return Rates for Subsistence Halibut Surveys by SHARC Type, 2005

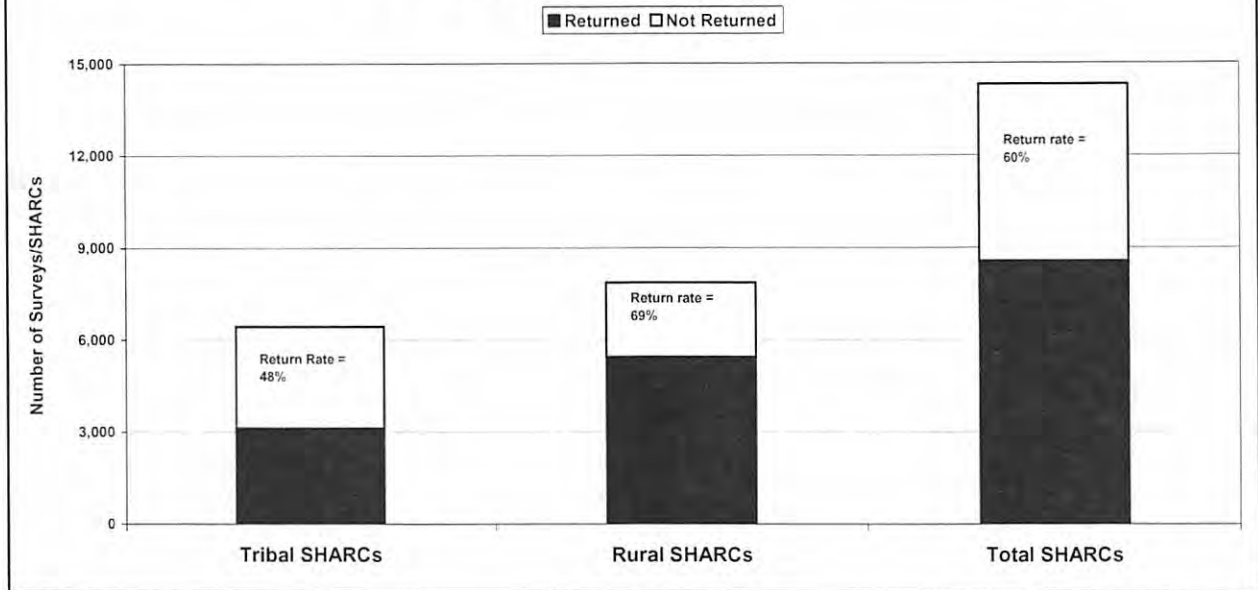


Figure 3. Subsistence Halibut Harvest Survey Return Rates, Communities and Tribes with More than 100 SHARCs Issued, 2005

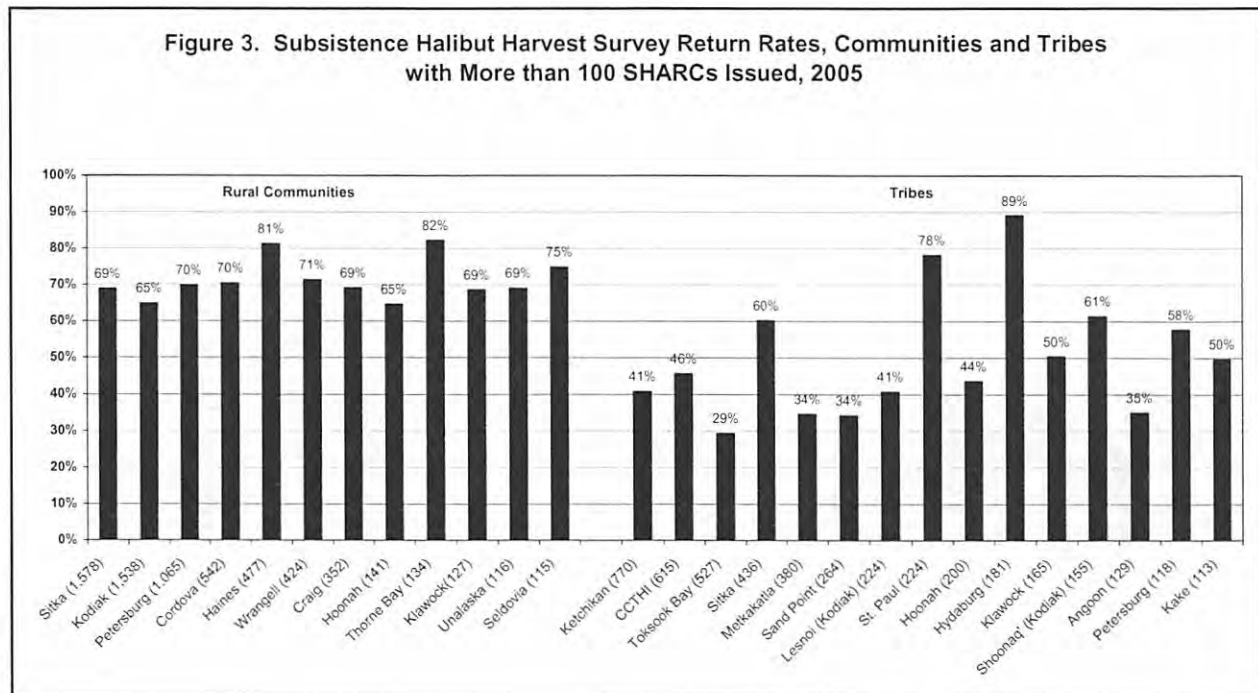


Figure 4. Return Rate by Place of Residence, 2005

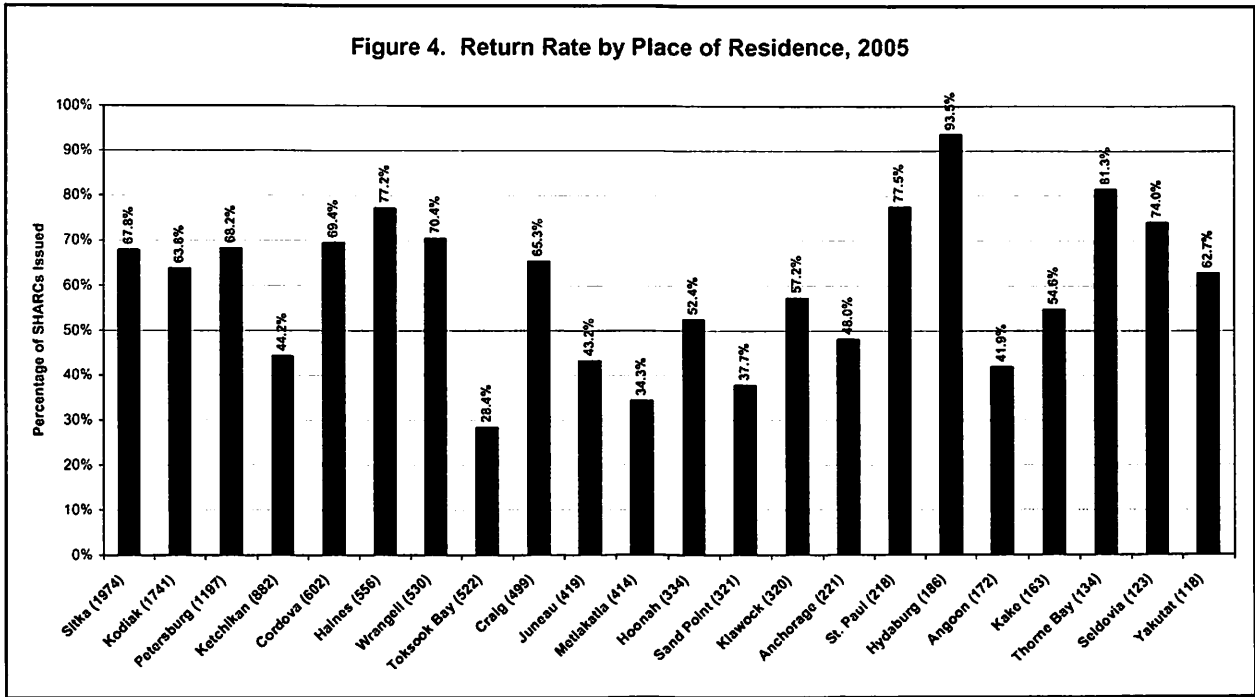


Figure 5. Number of Survey Responses by Response Category, 2005

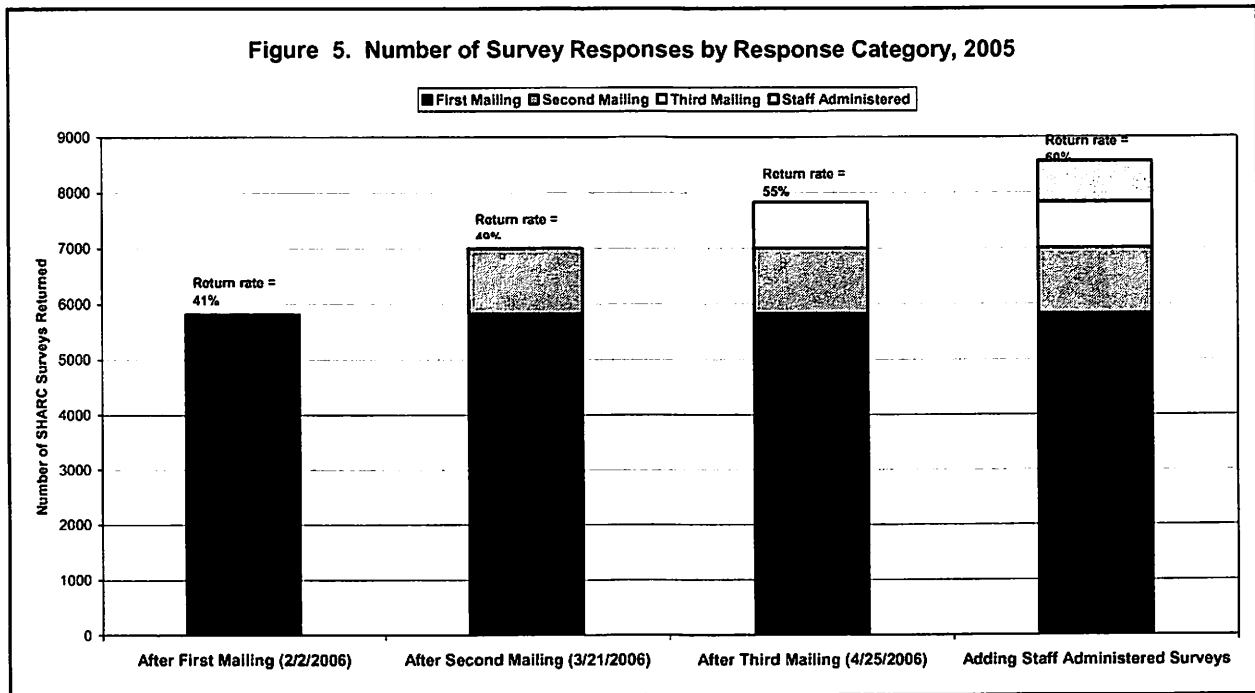


Figure 6. Number of SHARCs Issued and Estimated Number of Subsistence Halibut Fishers by SHARC Type, 2003, 2004, and 2005

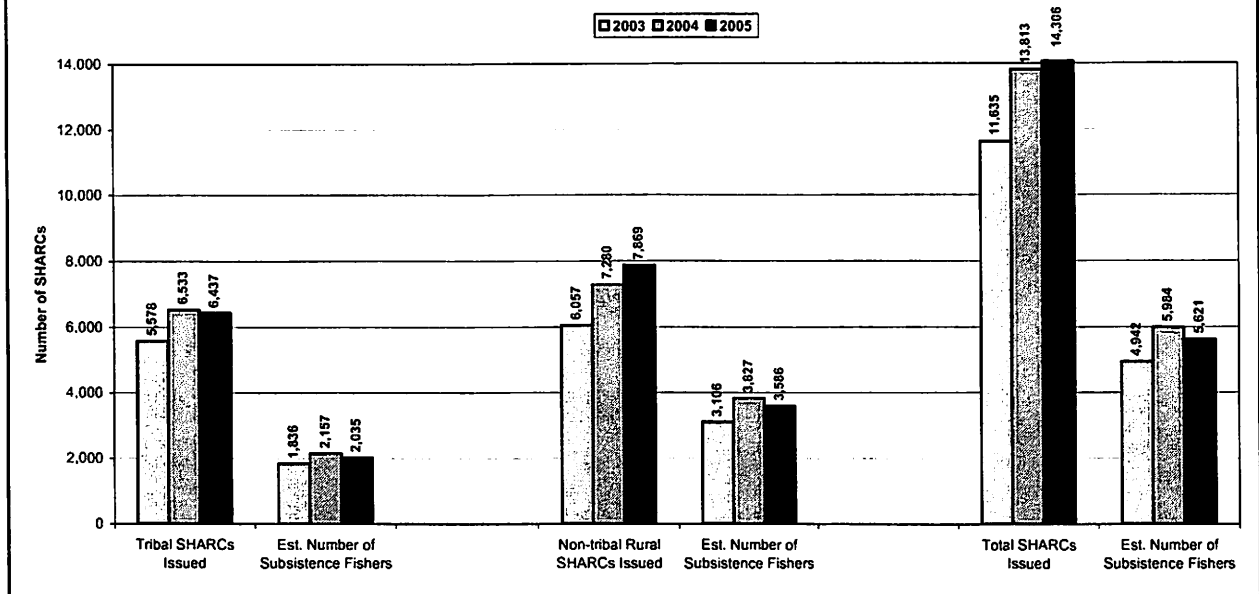


Figure 7. Age of Subsistence Halibut Registration Certificate Holders by SHARC Type, 2005

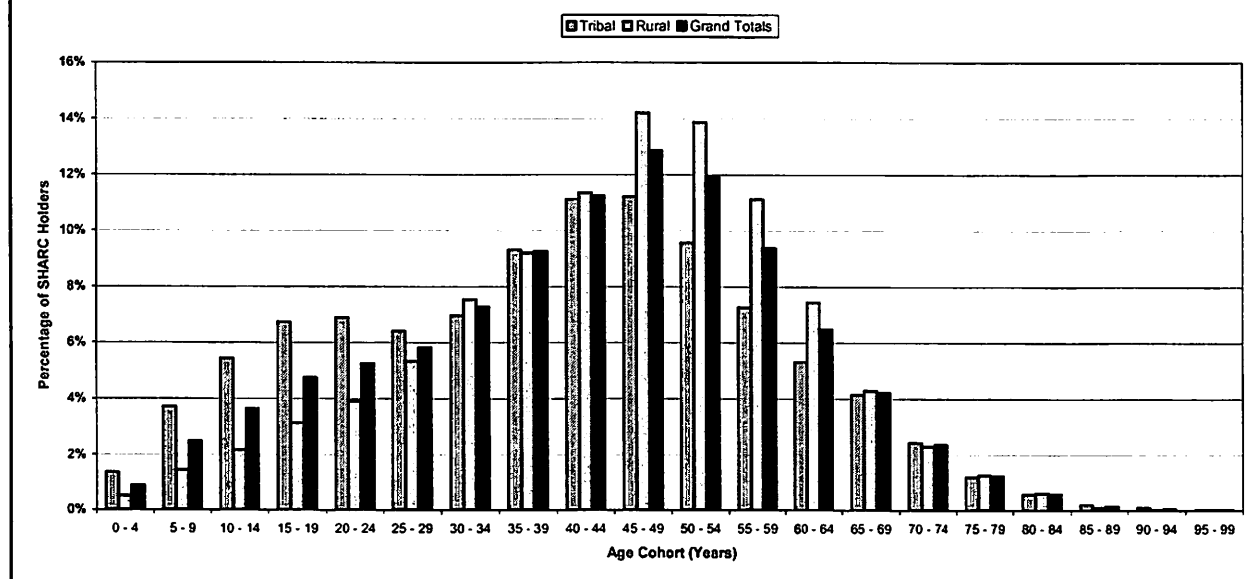


Figure 8. Estimated Number of Alaska Subsistence Halibut Fishers, 2003, 2004, and 2005 by Regulatory Area of Tribe or Rural Community

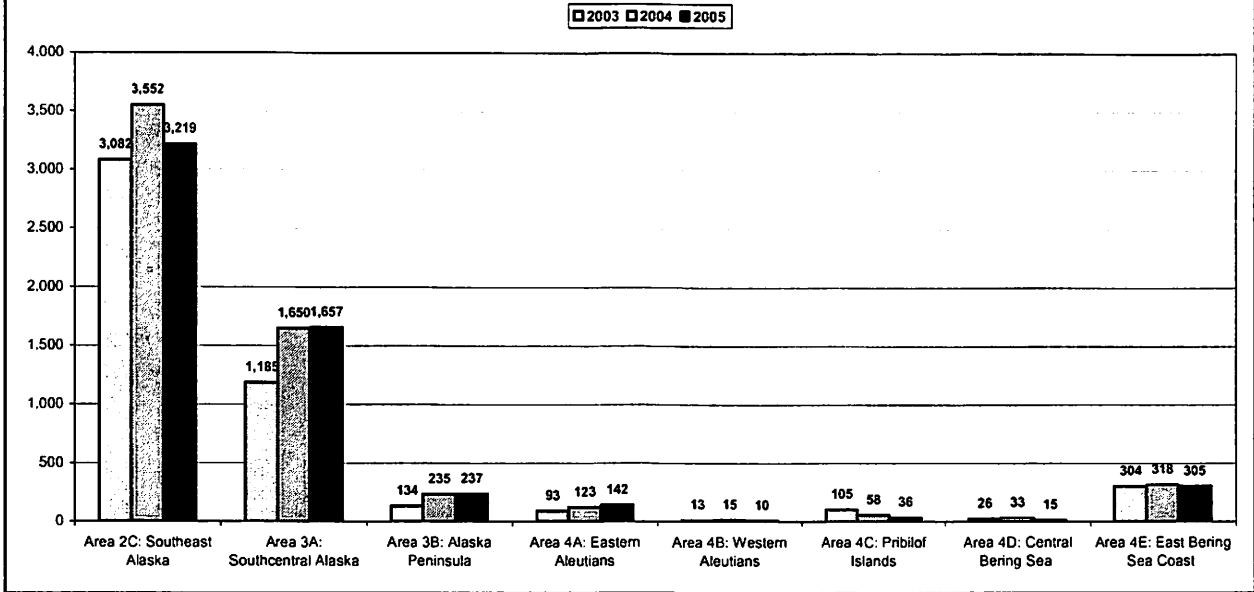
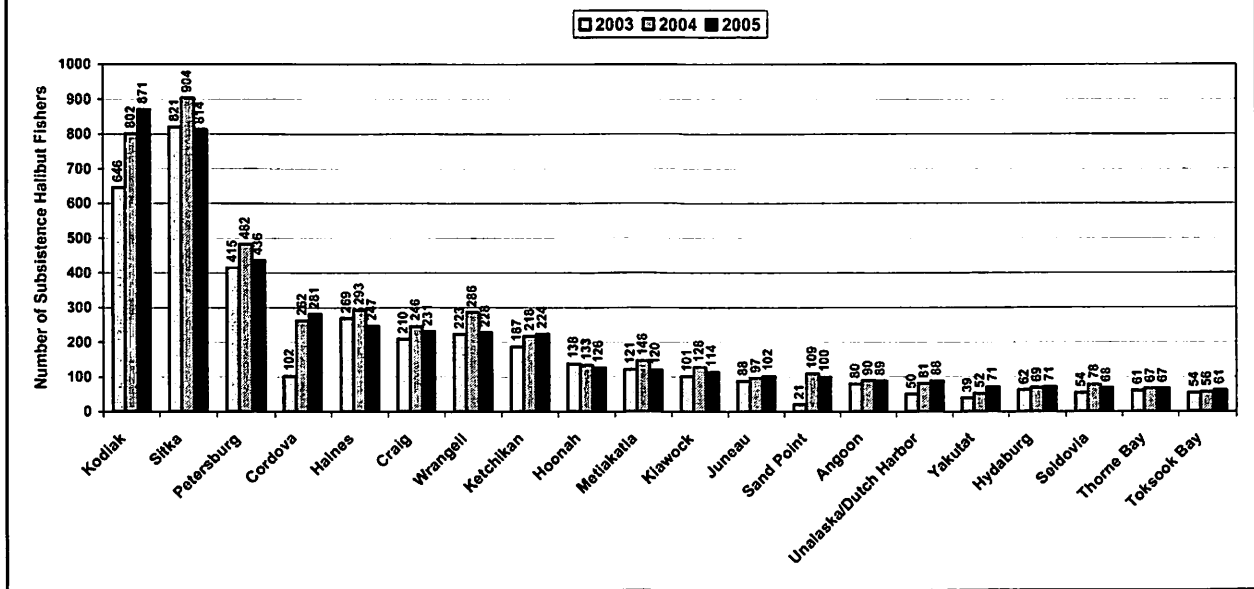


Figure 9. Estimated Number of Subsistence Halibut Fishers by Place of Residence (Selected Communities), 2003, 2004, and 2005



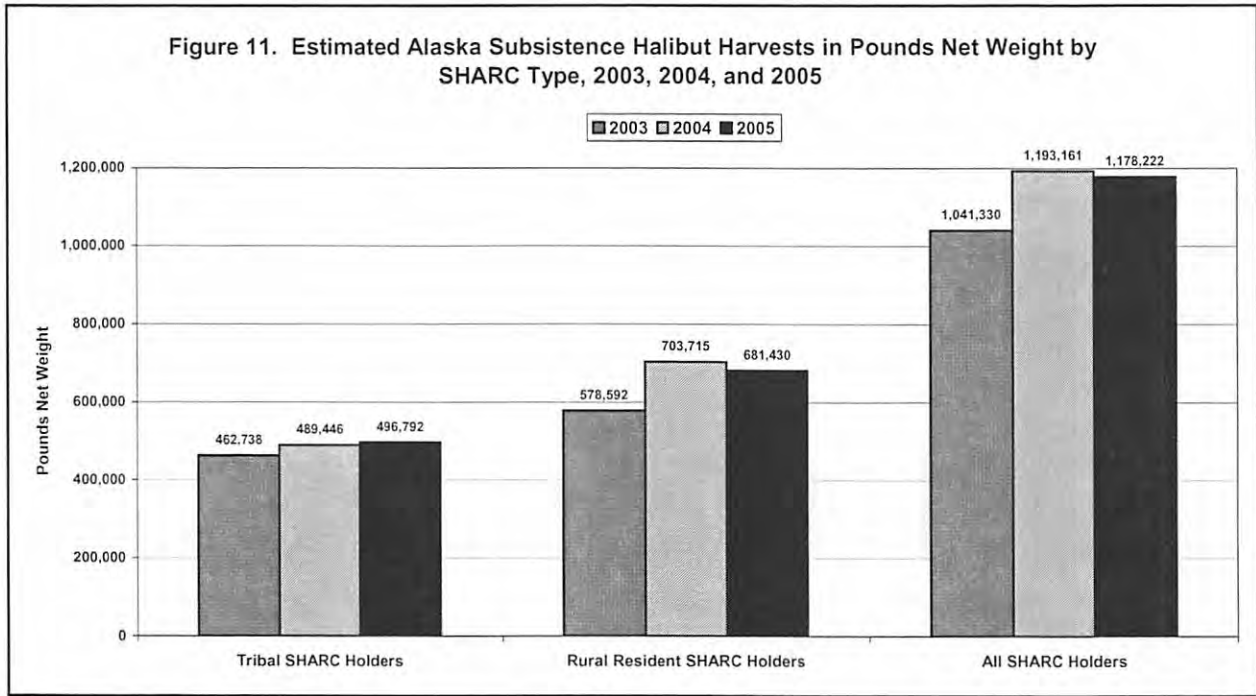
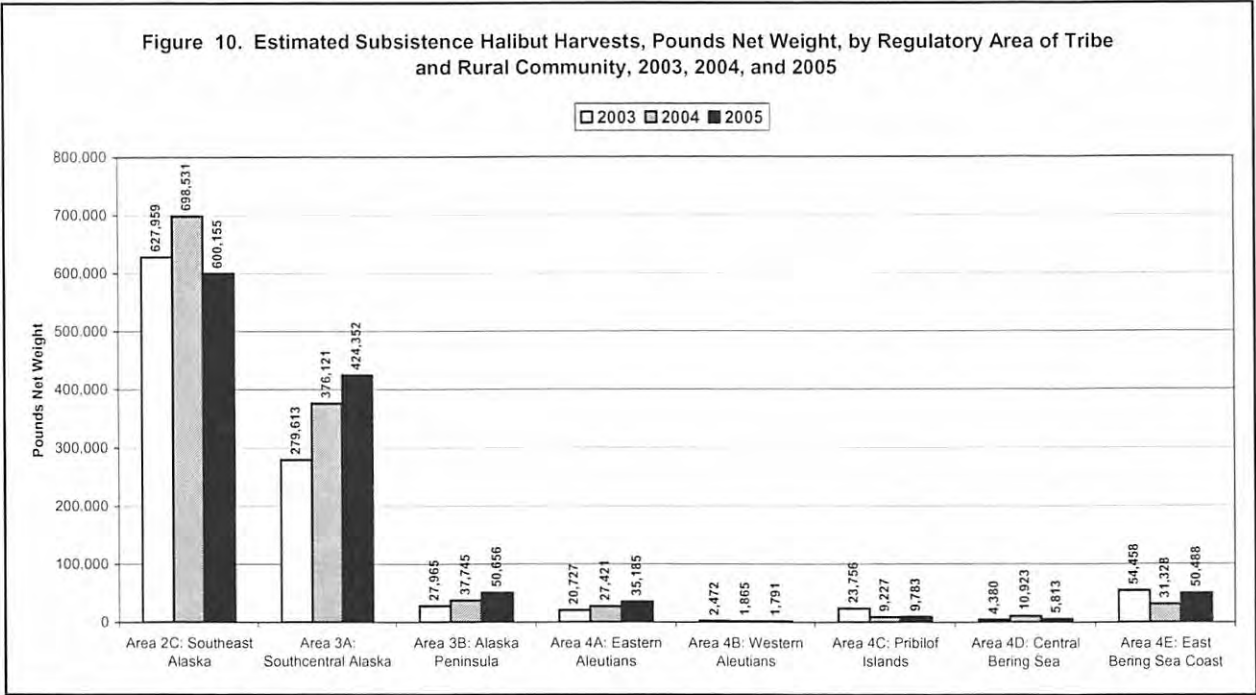


Figure 12. Percentage of Tribal Subsistence Halibut Harvest by Tribe, 2005

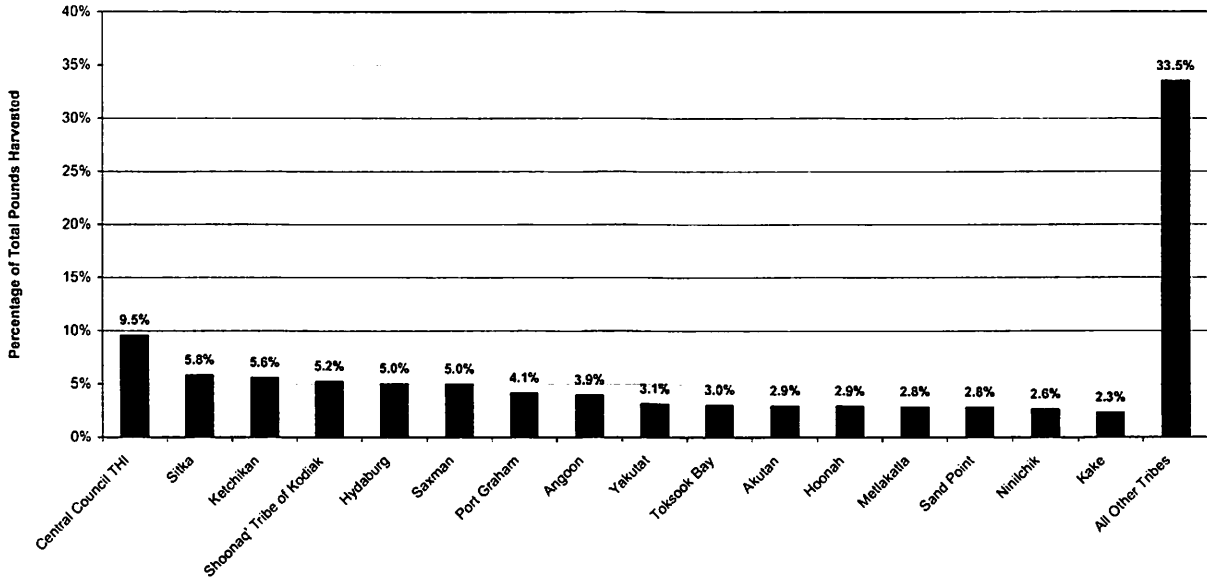


Figure 13. Percentage of Rural Community Subsistence Halibut Harvest by Community, 2005

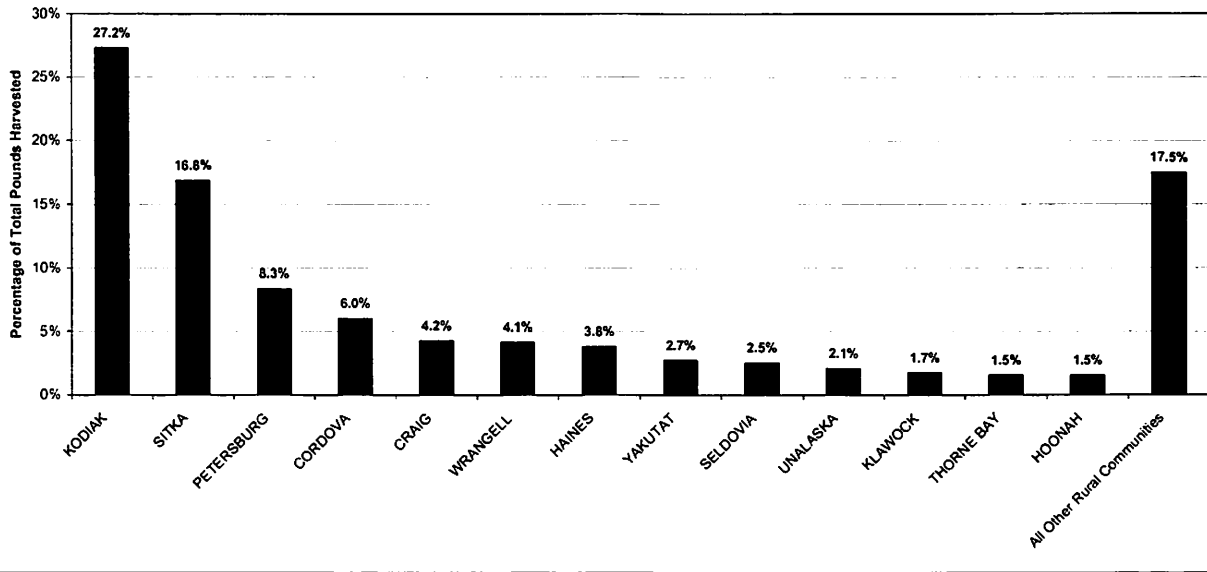


Figure 14. Percentage of Subsistence Halibut Harvest by Regulatory Area Fished, 2005

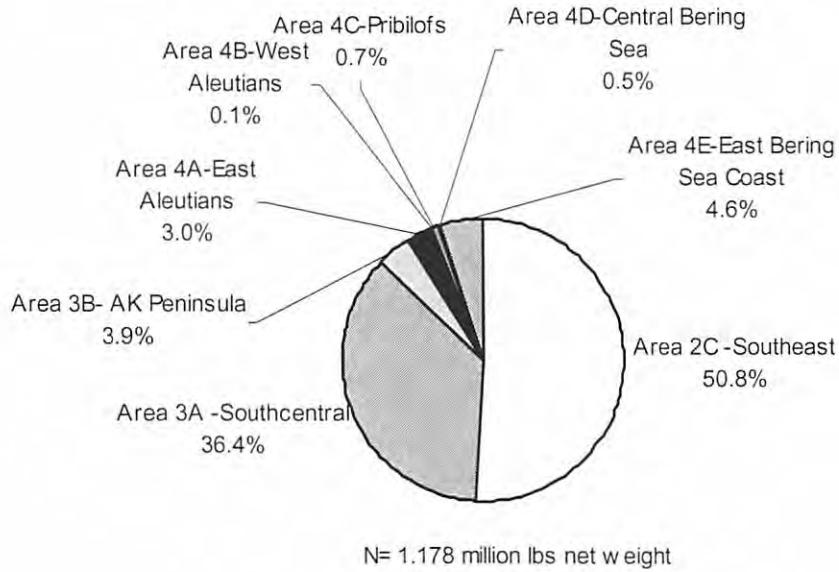


Figure 15. Alaska Subsistence Halibut Harvests by Geographic Area, 2005

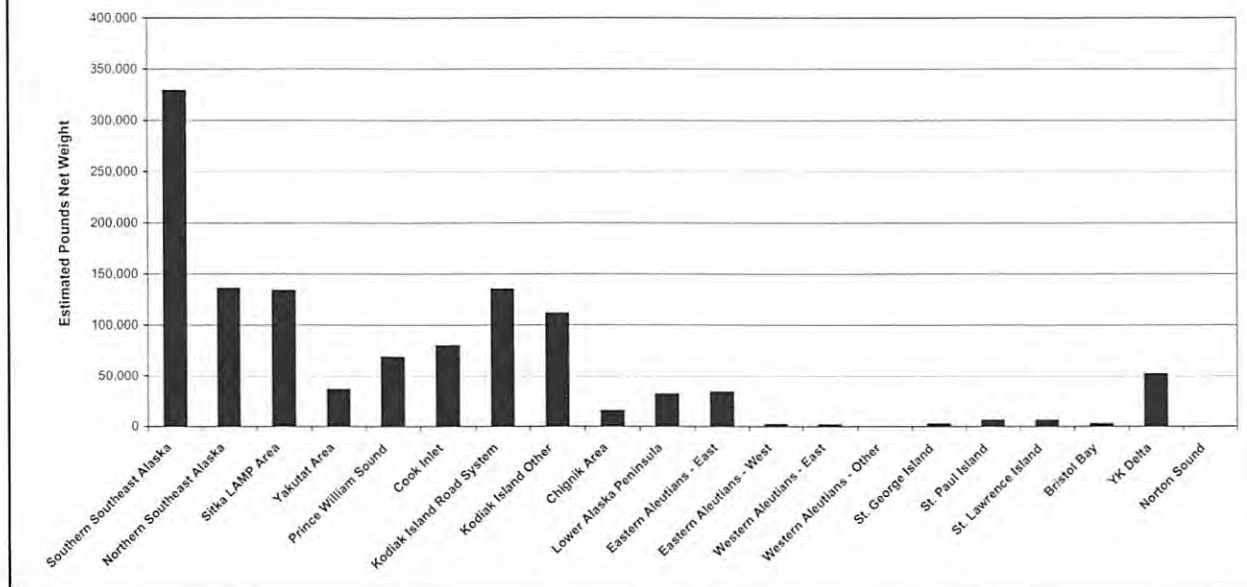


Figure 16. Percentage of Alaska Subsistence Harvest Hailbut by Geographic Area, 2005

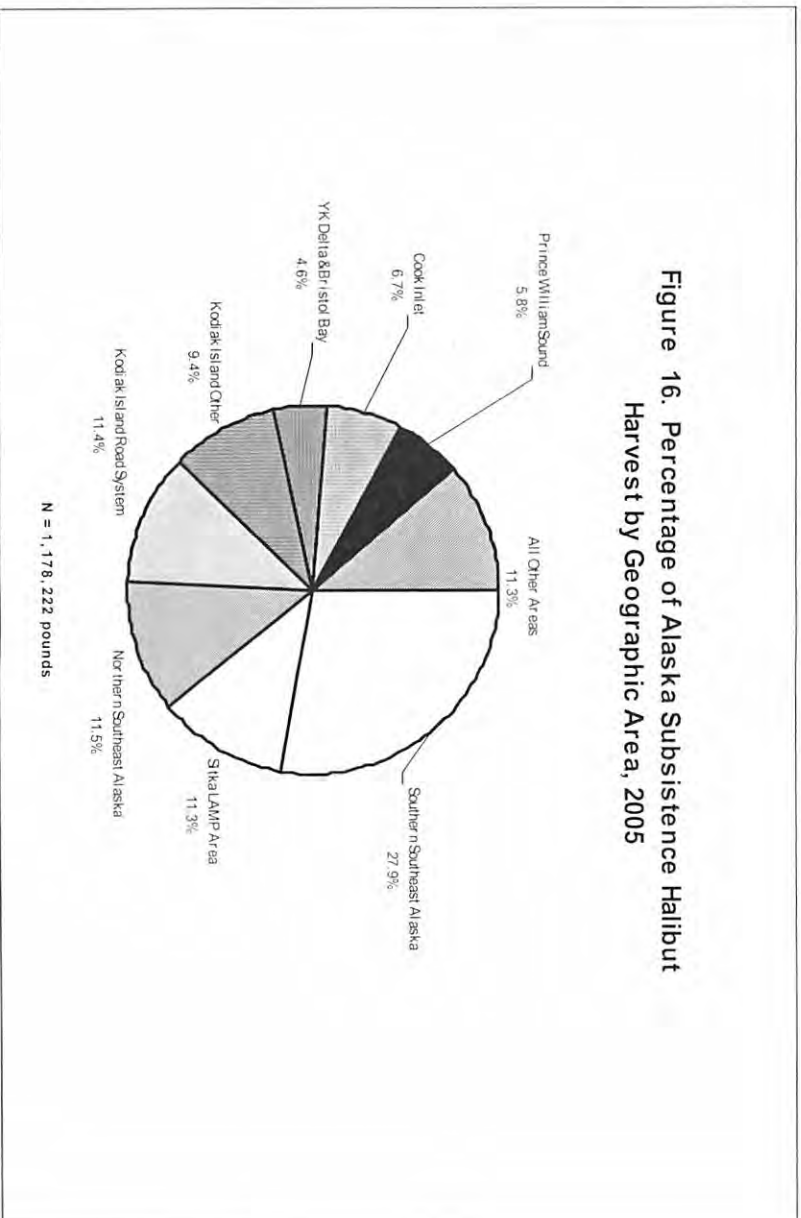


Figure 17. Estimated Subsistence Hailbut Harvests, Pounds Net Weight, by Regulatory Area Fished, 2003, 2004, and 2005

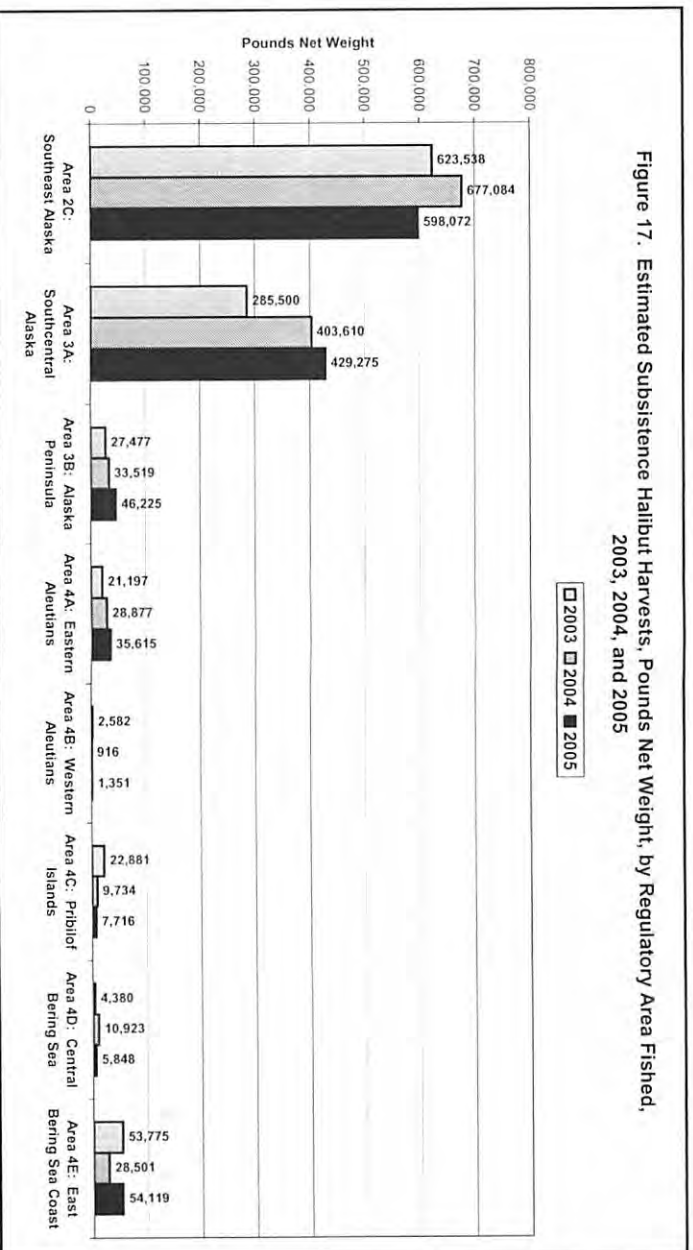


Figure 18. Change in Alaska Subsistence Halibut Harvests from 2004 to 2005 by Regulatory Area Fished

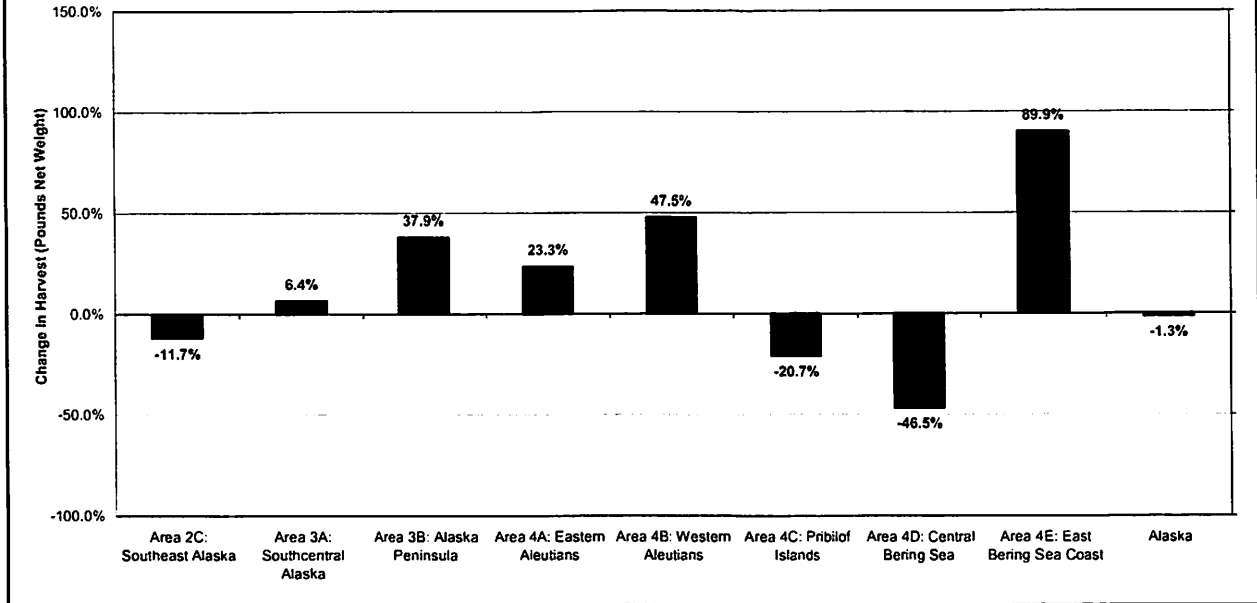


Figure 19. Change in Alaska Subsistence Halibut Harvests from 2003 to 2005 by Regulatory Area Fished

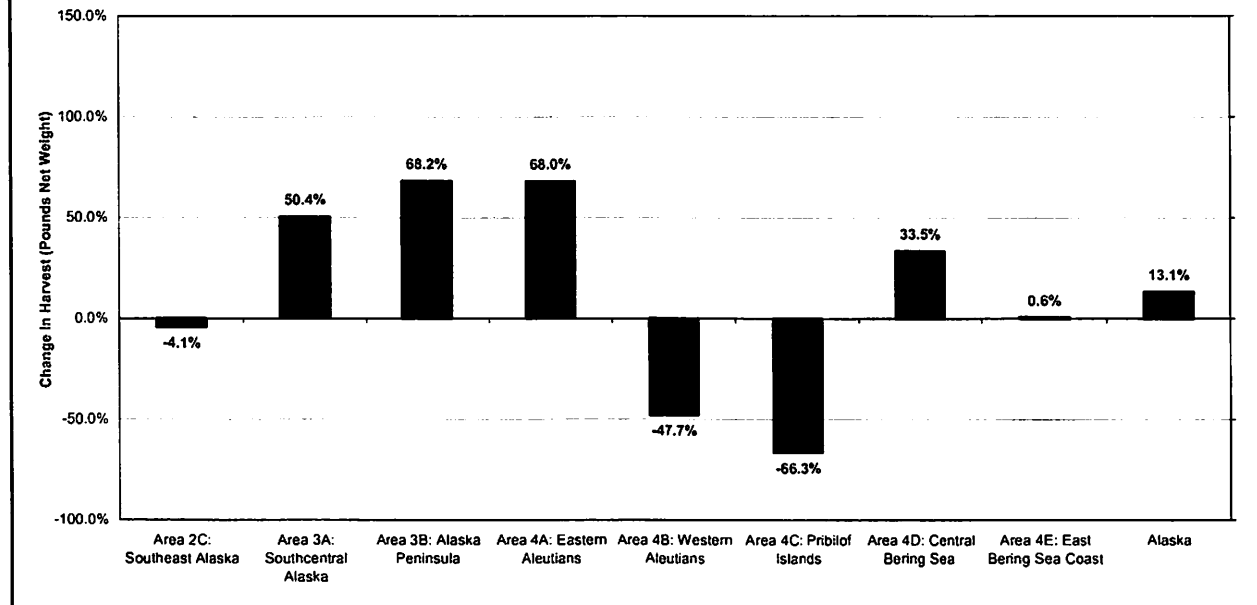


Figure 20. Average Subsistence Harvest of Halibut per Fisher in Alaska, 2005, by Regulatory Area, in Pounds Net Weight

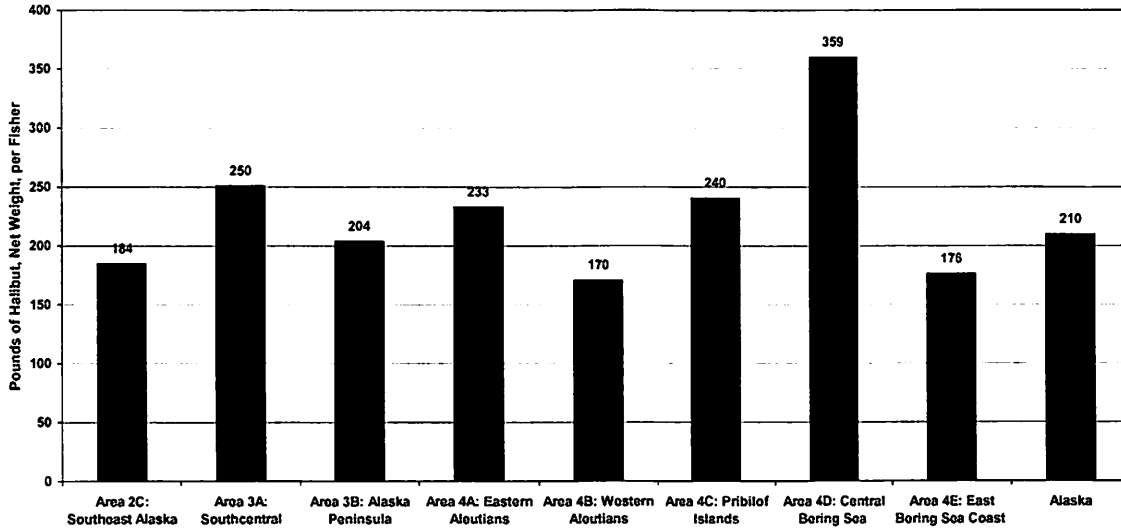


Figure 21. Average Subsistence Harvest of Halibut per Fisher in Alaska, 2005, by Regulatory Area, in Number of Fish

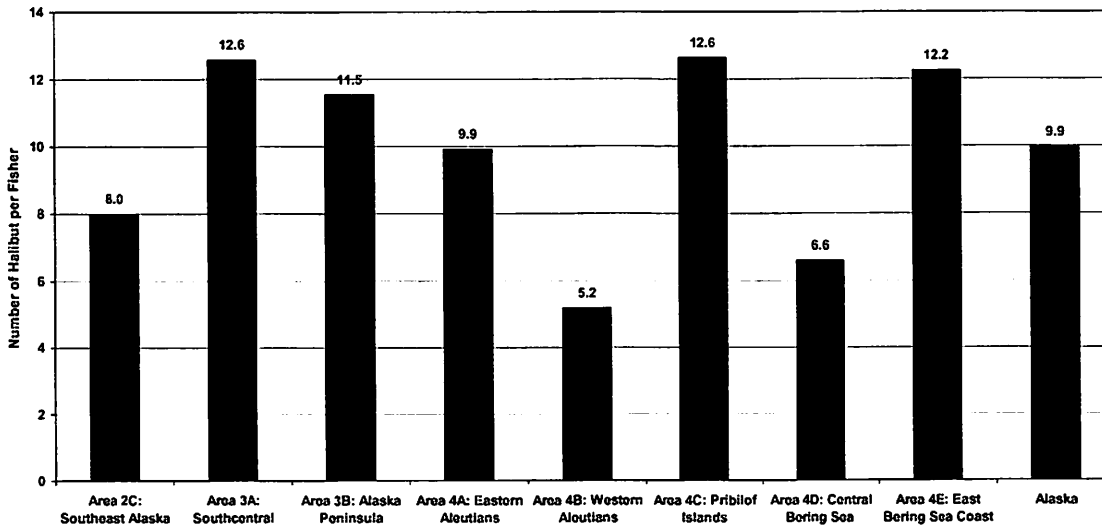


Figure 22. Alaska Subsistence Halibut Harvests by Place of Residence, 2005

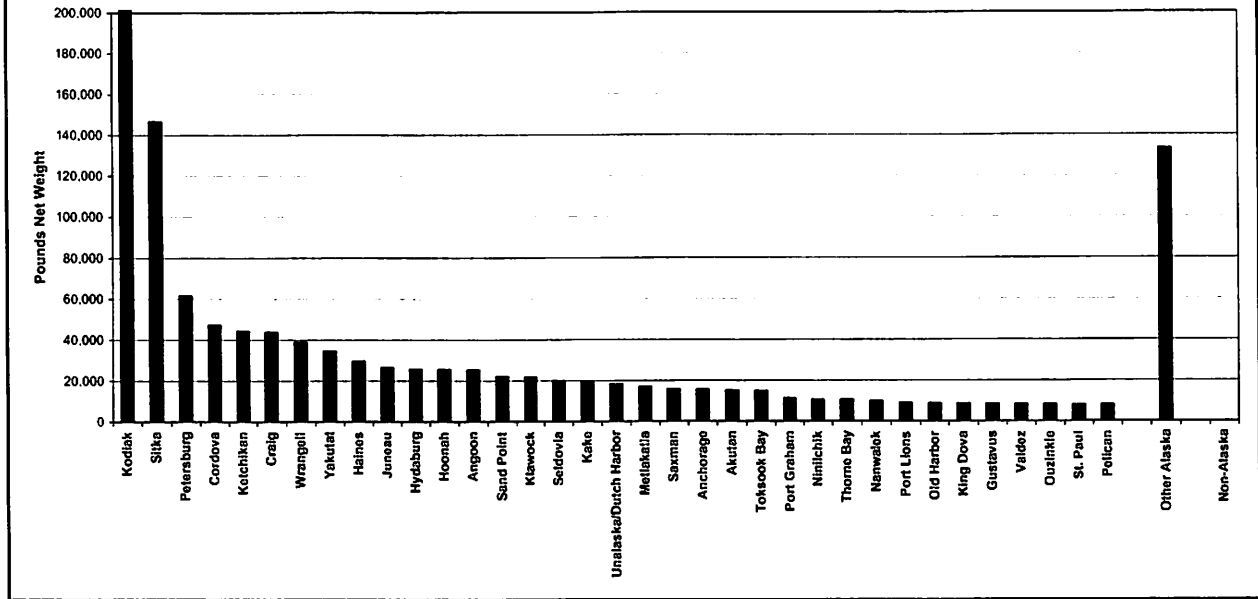


Figure 23. Percentage of Subsistence Halibut Harvest by Gear Type by Regulatory Area, 2005

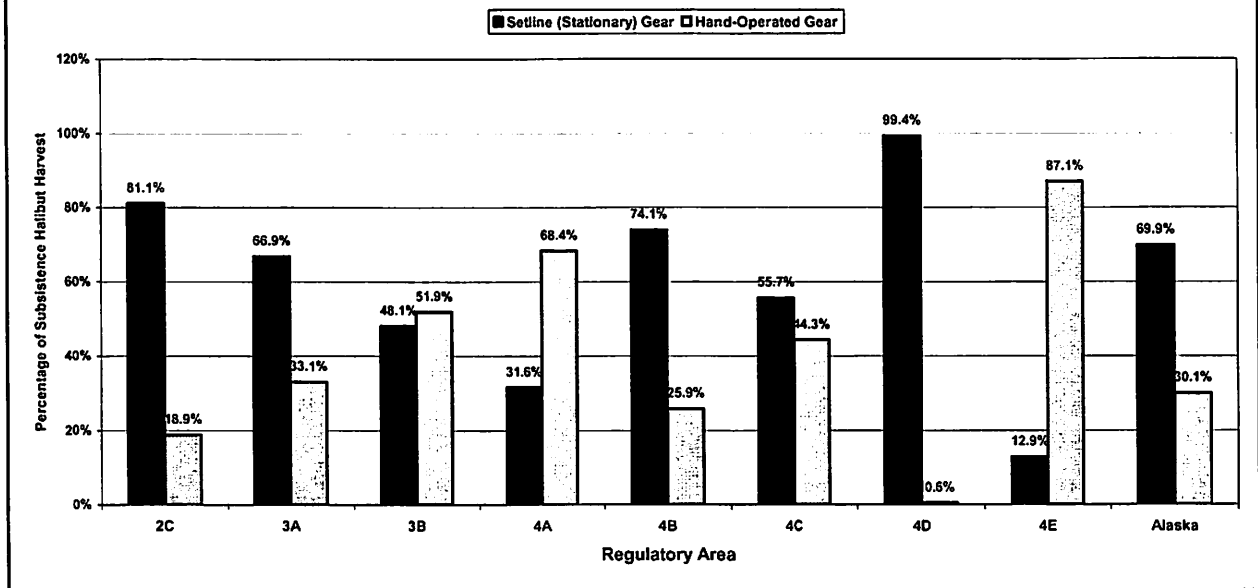


Figure 24. Number of Hooks Usually Fished, Percentage of Fishers Using Setline (Stationary) Gear, Alaska Subsistence Halibut Fishery, 2005

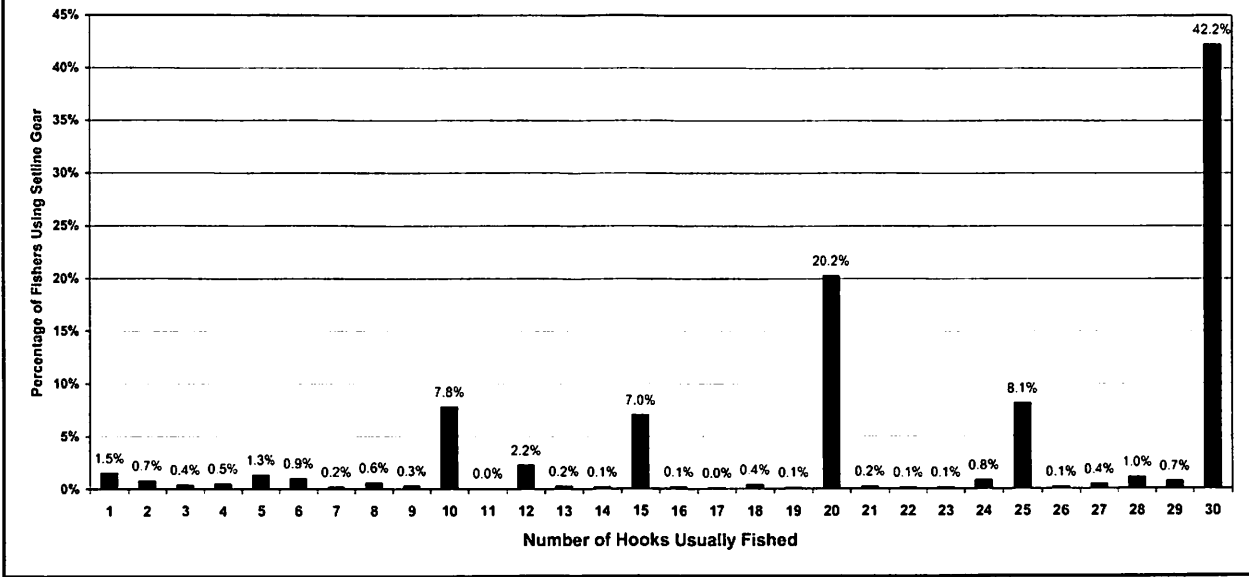


Figure 25. Estimated Incidental Harvests of Rockfish in the Alaska Subsistence Halibut Fishery, Number of Fish, by Regulatory Area Fished, 2003, 2004, and 2005

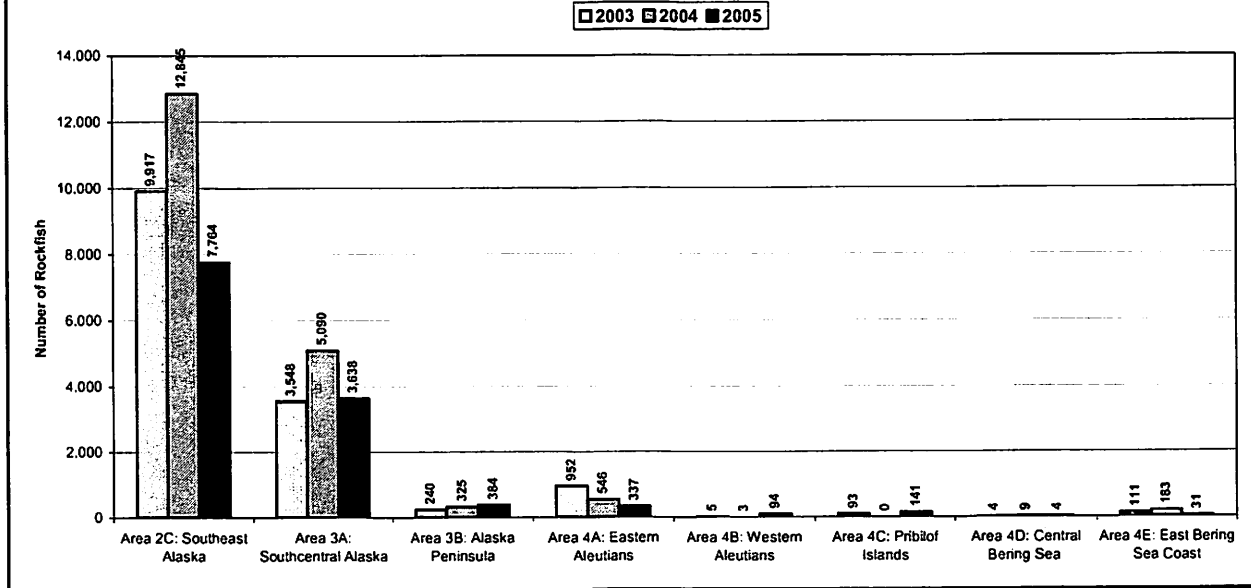


Figure 26. Percentage of Incidental Harvest of Rockfish by Regulatory Area Fished, 2005

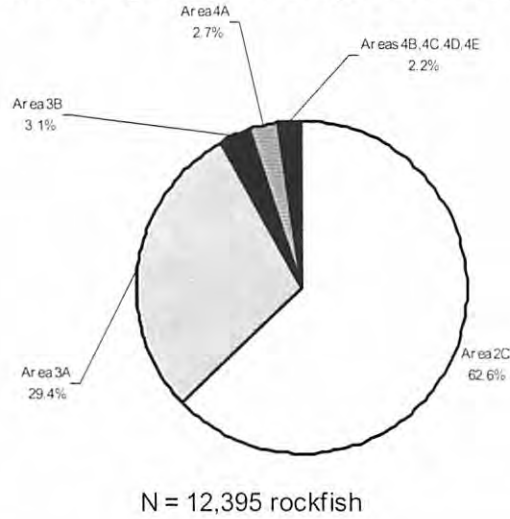


Figure 27. Estimated Incidental Harvests of Lingcod in the Alaska Subsistence Halibut Fishery, Number of Fish, by Regulatory Area Fished, 2003, 2004, and 2005

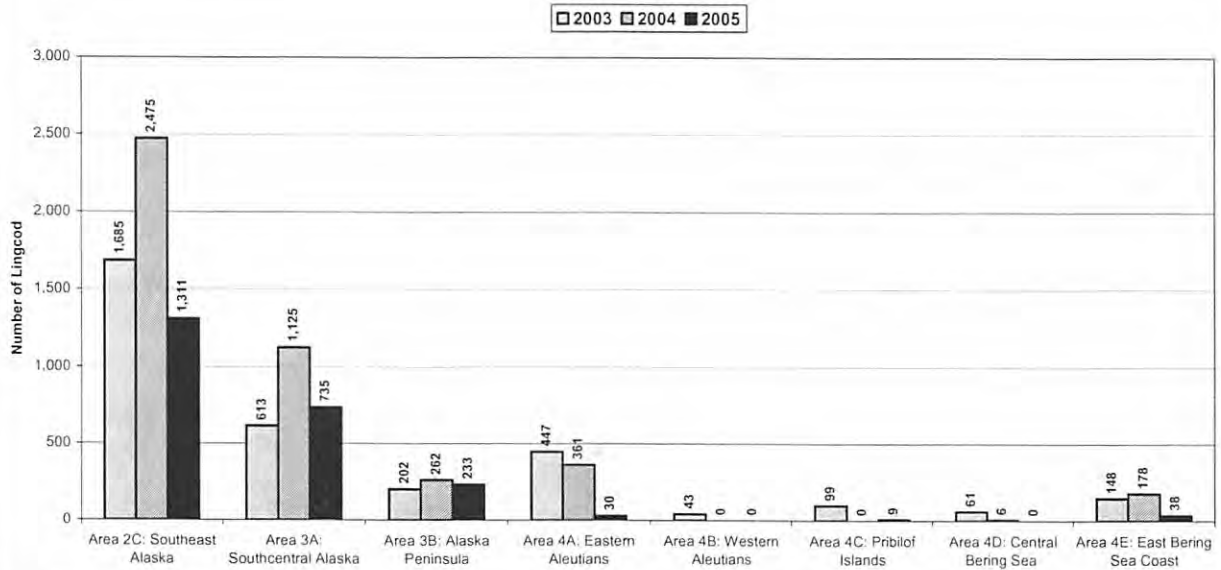


Figure 28. Percentage of Incidental Harvest of Lingcod by Regulatory Area, 2005

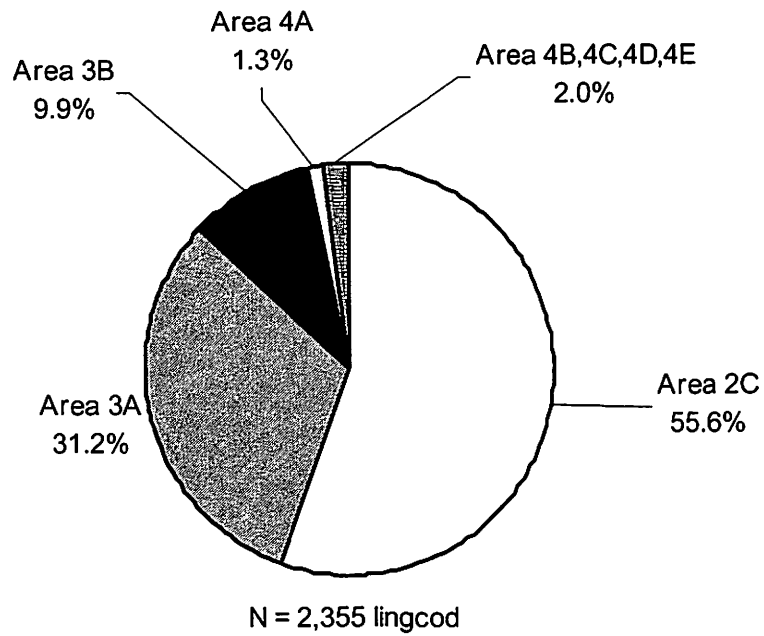


Figure 29. Estimated Harvests of Halibut for Home Use, Port Graham

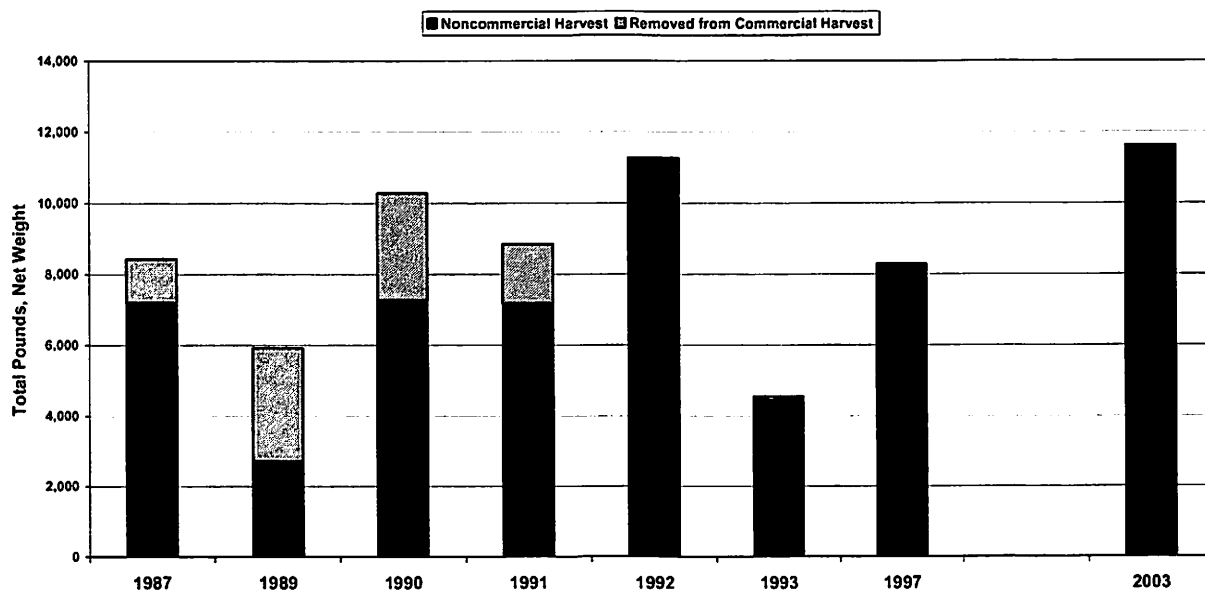
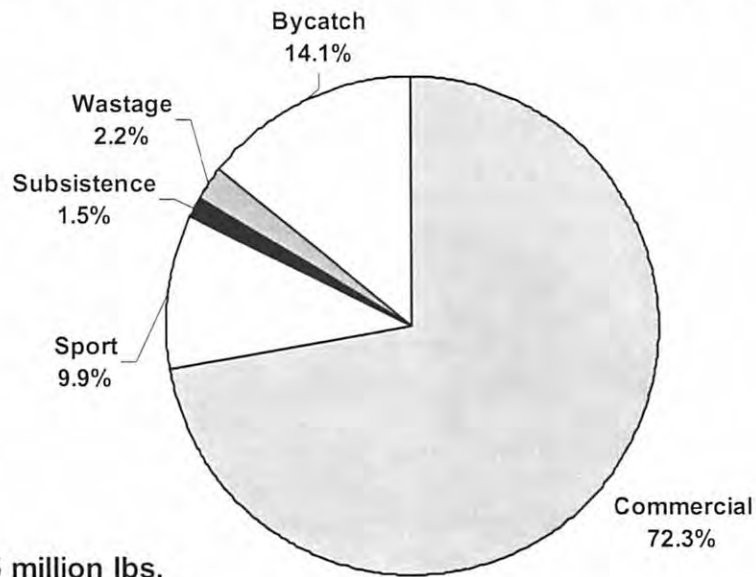
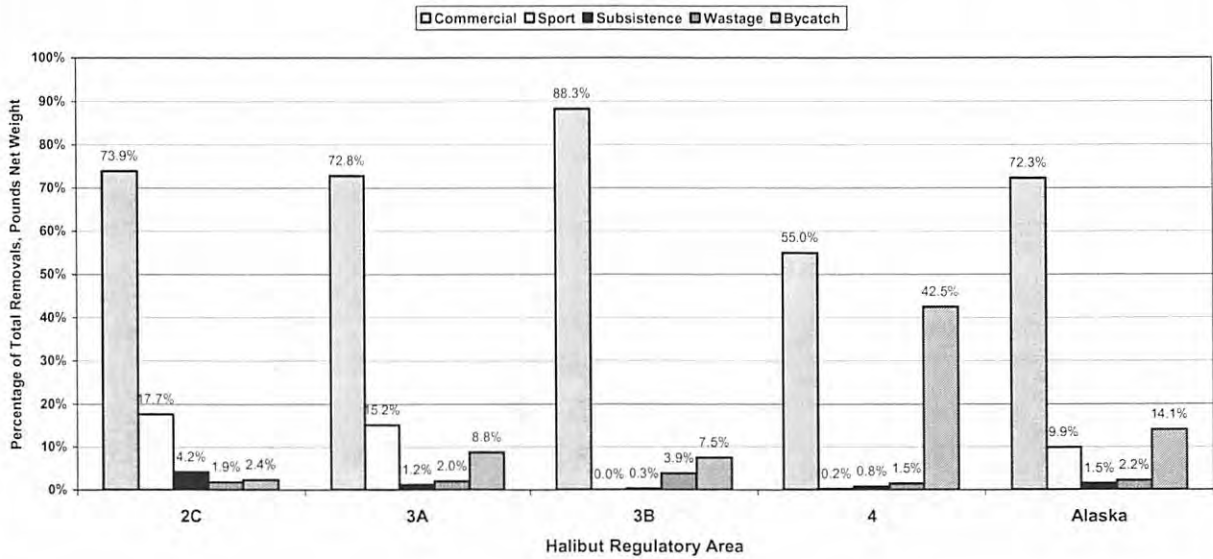


Figure 30. Halibut Removals, Alaska, 2005



**N = 81.165 million lbs,
net weight**

Figure 31. Halibut Removals in Alaska by Regulatory Area and Removal Category, 2005



APPENDIX A

List of Eligible Tribes and Rural Communities
(from Federal Register)

Chichagof Island at 57°22'03" N. lat., 135°43'00" W. long., and
 (B) A line from Chichagof Island at 57°22'35" N. lat., 135°41'18" W. long. to Baranof Island at 57°22'17" N. lat., 135°40'57" W. lat.; and

(C) That is enclosed on the south and west by a line from Sitka Point at 56°59'23" N. lat., 135°49'34" W. long., to Hamus Point at 56°51'55" N. lat., 135°30'30" W. long.,

(D) To the green day marker in Dorothy Narrows at 56°49'17" N. lat., 135°22'45" W. long. to Baranof Island at 56°49'17" N. lat., 135°22'36" W. long.

(2) A person using a vessel greater than 35 ft (10.7 m) in overall length, as defined at 50 CFR 300.61, is prohibited from fishing for IFQ halibut with setline gear, as defined at 50 CFR 300.61, within Sitka Sound as defined in paragraph (d)(1)(i) of this section.

(3) A person using a vessel less than or equal to 35 ft (10.7 m) in overall length, as defined at 50 CFR 300.61:

(i) Is prohibited from fishing for IFQ halibut with setline gear within Sitka Sound, as defined in paragraph (d)(1)(ii) of this section, from June 1 through August 31; and

(ii) Is prohibited, during the remainder of the designated IFQ season, from retaining more than 2,000 lb (907 mt) of IFQ halibut within Sitka Sound, as defined in paragraph (d)(1)(ii) of this section, per IFQ fishing trip, as defined in 50 CFR 300.61.

(4) No charter vessel, as defined at 50 CFR 300.61, shall engage in sport fishing, as defined at 50 CFR 300.61(b), for halibut within Sitka Sound, as defined in paragraph (d)(1)(ii) of this section, from June 1 through August 31.

(i) No charter vessel shall retain halibut caught while engaged in sport fishing, as defined at 50 CFR 300.61(b), for other species, within Sitka Sound, as defined in paragraph (d)(1)(ii) of this section, from June 1 through August 31.

(ii) Notwithstanding paragraphs (d)(4) and (d)(4)(i) of this section, halibut harvested outside Sitka Sound, as defined in (d)(1)(ii) of this section, may be retained onboard a charter vessel engaged in sport fishing, as defined in 50 CFR 300.61(b), for other species within Sitka Sound, as defined in paragraph (d)(1)(ii) of this section, from June 1 through August 31.

(e) Sitka Pinnacles Marine Reserve. (1) For purposes of this paragraph (e), the Sitka Pinnacles Marine Reserve means an area totaling 2.5 square nm off Cape Edgecumbe, defined by straight lines connecting the following points in a counterclockwise manner:

- 56°55.5'N lat., 135°54.0'W long;
- 56°57.0'N lat., 135°54.0'W long;
- 56°57.0'N lat., 135°57.0'W long;

56°55.5'N lat., 135°57.0'W long.
 (2) No person shall engage in commercial, sport or subsistence fishing, as defined at § 300.61, for halibut within the Sitka Pinnacles Marine Reserve.

(3) No person shall anchor a vessel within the Sitka Pinnacles Marine Reserve if halibut is on board.

(f) Subsistence fishing in and off Alaska. No person shall engage in subsistence fishing for halibut unless that person meets the requirements in paragraphs (f)(1) or (f)(2) of this section.

(1) A person is eligible to harvest subsistence halibut if he or she is a rural resident of a community with customary and traditional uses of halibut listed in the following table:

HALIBUT REGULATORY AREA 2C

Rural Community	Organized Entity
Angoon	Municipality
Coffman Cove	Municipality
Craig	Municipality
Edna Bay	Census Designated Place
Elfin Cove	Census Designated Place
Gustavus	Census Designated Place
Heines	Municipality
Hollis	Census Designated Place
Hoonah	Municipality
Hydaburg	Municipality
Hyder	Census Designated Place
Kake	Municipality
Kasaan	Municipality
Klawock	Municipality
Klukwan	Census Designated Place
Metlakatla	Census Designated Place
Mayers Chuck	Census Designated Place
Pelican	Municipality
Petersburg	Municipality
Point Baker	Census Designated Place
Port Alexander	Municipality
Port Protection	Census Designated Place
Saxman	Municipality
Sitka	Municipality
Skagway	Municipality
Tenakee Springs	Municipality
Thorne Bay	Municipality
Whale Pass	Census Designated Place
Wrangell	Municipality

HALIBUT REGULATORY AREA 3A

Rural Community	Organized Entity
Akhiok	Municipality
Chenega Bay	Census Designated Place
Cordova	Municipality

HALIBUT REGULATORY AREA 3A— Continued

Rural Community	Organized Entity
Karluk	Census Designated Place
Kodiak City	Municipality
Larsen Bay	Municipality
Nanwalek	Census Designated Place
Old Harbor	Municipality
Ouzinkie	Municipality
Port Graham	Census Designated Place
Port Lions	Municipality
Seldovia	Municipality
Tattletale	Census Designated Place
Yakutat	Municipality

HALIBUT REGULATORY AREA 3B

Rural Community	Organized Entity
Chignik Bay	Municipality
Chignik Lagoon	Census Designated Place
Chugtlik Lake	Census Designated Place
Cold Bay	Municipality
False Pass	Municipality
Ivanof Bay	Census Designated Place
King Cove	Municipality
Nelson Lagoon	Census Designated Place
Perryville	Census Designated Place
Sand Point	Municipality

HALIBUT REGULATORY AREA 4A

Rural Community	Organized Entity
Akutan	Municipality
Nikolski	Census Designated Place
Unalaska	Municipality

HALIBUT REGULATORY AREA 4B

Rural Community	Organized Entity
Adak	Census Designated Place
Atka	Municipality

HALIBUT REGULATORY AREA 4C

Rural Community	Organized Entity
St. George	Municipality
St. Paul	Municipality

HALIBUT REGULATORY AREA 4D

Rural Community	Organized Entity
Gambell	Municipality
Savoonga	Municipality

**HALIBUT REGULATORY AREA 4D—
Continued**

Rural Community	Organized Entity
Diomede (Inalik)	Municipality

HALIBUT REGULATORY AREA 4E

Rural Community	Organized Entity
Alaskanuk	Municipality
Aleknegik	Municipality
Bethel	Municipality
Brevig Mission	Municipality
Chisofmak	Municipality
Chevak	Municipality
Clark's Point	Municipality
Council	Census Designated Place
Dillingham	Municipality
Eek	Municipality
Egegik	Municipality
Elim	Municipality
Emmonak	Municipality
Golovin	Municipality
Goodnews Bay	Municipality
Hooper Bay	Municipality
King Salmon	Census Designated Place
Kipnuk	Census Designated Place
Kongiganak	Census Designated Place
Kotik	Municipality
Koyuk	Municipality
Kwigillingok	Census Designated Place
Levelock	Census Designated Place
Manokotak	Municipality
Mekoryak	Municipality
Naknek	Census Designated Place
Napaklak	Municipality
Napaskiak	Municipality
Nowtok	Census Designated Place
Nightmute	Municipality
Nome	Municipality
Oscarville	Census Designated Place
Pilot Point	Municipality
Platinum	Municipality
Port Heiden	Municipality
Quinhagak	Municipality
Scammon Bay	Municipality
Shaktotuk	Municipality
Sheldon Point (Nunam Iqua)	Municipality
Shishmaref	Municipality
Solomon	Census Designated Place
South Naknek	Census Designated Place
St. Michael	Municipality
Stebbins	Municipality
Teller	Municipality
Togiak	Municipality
Toksook Bay	Municipality
Tuntutuliak	Census Designated Place
Tununak	Census Designated Place

**HALIBUT REGULATORY AREA 4E—
Continued**

Rural Community	Organized Entity
Twin Hills	Census Designated Place
Ugashik	Census Designated Place
Unalakleet	Municipality
Wales	Municipality
White Mountain	Municipality

(2) A person is eligible to harvest subsistence halibut if he or she is a member of an Alaska Native tribe with customary and traditional uses of halibut listed in the following table:

HALIBUT REGULATORY AREA 2C

Place with Tribal Headquarters	Organized Tribal Entity
Angeon	Angeon Community Association
Craig	Craig Community Association
Haines	Chilkoot Indian Association
Hoonah	Hoonah Indian Association
Hydaburg	Hydaburg Cooperative Association
Juneau	Aukquen Traditional Council
Kake	Central Council Tlingit and Haida Indian Tribes Douglas Indian Association
Kasaan	Organized Village of Kasaan
Ketchikan	Ketchikan Indian Corporation
Klawock	Klawock Cooperative Association
Klukwan	Chikita Indian Village
Mattakata	Mattakata Indian Community, Annette Island Reserve
Petersburg	Petersburg Indian Association
Saxman	Organized Village of Saxman
Sitka	Sitka Tribe of Alaska
Skagway	Skagway Village
Wrangell	Wrangell Cooperative Association

HALIBUT REGULATORY AREA 3A

Place with Tribal Headquarters	Organized Tribal Entity
Akhiok	Native Village of Akhiok
Chenega Bay	Native Village of Chenega

**HALIBUT REGULATORY AREA 3A—
Continued**

Place with Tribal Headquarters	Organized Tribal Entity
Cordova	Native Village of Eyak
Karluk	Native Village of Karluk
Kenai-Soldotna	Kenaitze Indian Tribe
Kodiak City	Village of Satastott Lesnoi Village (Woody Island) Native Village of Afognak Shoonag' Tribe of Kodiak
Larsen Bay	Native Village of Larsen Bay
Nanwalek	Native Village of Nanwalek
Ninichik	Ninichik Village
Old Harbor	Village of Old Harbor
Ouzinkie	Native Village of Ouzinkie
Port Graham	Native Village of Port Graham
Port Lions	Native Village of Port Lions
Seldovia	Seldovia Village Tribe
Tatitlek	Native Village of Tatitlek
Yakutat	Yakutat Tlingit Tribe

HALIBUT REGULATORY AREA 3B

Place with Tribal Headquarters	Organized Tribal Entity
Chignik Bay	Native Village of Chignik
Chignik Lagoon	Native Village of Chignik Lagoon
Chignik Lake	Chignik Lake Village
False Pass	Native Village of False Pass
Ivanof Bay	Ivanof Bay Village
King Cove	Agdaagux Tribe of King Cove
Nelson Lagoon	Native Village of Belkofski
Perryville	Native Village of Perryville
Sand Point	Pauloff Harbor Village
	Native Village of Unga
	Oagan Toyagungin Tribe of Sand Point Village

HALIBUT REGULATORY AREA 4A		HALIBUT REGULATORY AREA 4E— Continued		HALIBUT REGULATORY AREA 4E— Continued	
Place with Tribal Headquarters	Organized Tribal Entity	Place with Tribal Headquarters	Organized Tribal Entity	Place with Tribal Headquarters	Organized Tribal Entity
Akutan	Native Village of Akutan	Elim	Native Village of Elim	Stebbins	Stebbins Community Association
Nikolski	Native Village of Nikolski	Emmonak	Chulioonawick Native Village	Teller	Native Village of Mary's Igloo
Unalaska	Cawatingin Tribe of Unalaska	Golovin	Emmonak Village	Togiak	Native Village of Teller
HALIBUT REGULATORY AREA 4B			Chinik Eskimo Community	Toksook Bay	Traditional Village of Togiak
		Goodnews Bay	Native Village of Goodnews Bay	Tuntutuliak	Native Village of Toksook Bay
		Hooper Bay	Native Village of Hooper Bay	Turunak	Native Village of Tuntutuliak
			Native Village of Peaimut	Twin Hills	Native Village of Turunak
		King Salmon	King Salmon Tribal Council	Ugashik	Twin Hills Village
		Kipnuk	Native Village of Kipnuk	Unalakleet	Ugashik Village
		Kongiganak	Native Village of Kongiganak	Wales	Native Village of Unalakleet
		Kotlik	Native Village of Hamilton	White Mountain	Native Village of Wales
			Village of Bill Moore's Slough		Native Village of White Mountain
			Village of Kotlik		
		Koyuk	Native Village of Koyuk		
		Kwigillingok	Native Village of Kwigillingok		
		Levelock	Levelock Village		
		Manokotak	Manokotak Village		
		Mekoryak	Native Village of Mekoryak		
		Naknek	Naknek Native Village		
		Napaklak	Native Village of Napakiak		
		Nepaskiak	Native Village of Napaskiak		
		Nowtok	Nowtok Village		
		Nightmute	Native Village of Nightmute		
			Umkumiute Native Village		
			King Island Native Community		
		Nome	Nome Eskimo Community		
		Oscarville	Oscarville Traditional Village		
		Pilot Point	Native Village of Pilot Point		
		Platinum	Platinum Traditional Village		
		Port Heiden	Native Village of Port Heiden		
		Quinhagak	Native Village of Quinhagak		
		Scammon Bay	Native Village of Scammon Bay		
		Shaktodik	Native Village of Shaktodik		
		Sheldon Point (Nunaiqua)	Native Village of Sheldon's Point		
		Shishmaref	Native Village of Shishmaref		
		Solomon	Village of Solomon		
		South Naknek	South Naknek Village		
		St. Michael	Native Village of Saint Michael		

(g) *Limitations on subsistence fishing.* Subsistence fishing for halibut may be conducted only by persons who qualify for such fishing pursuant to paragraph (f) of this section and who hold a valid subsistence halibut registration certificate in that person's name issued by NMFS pursuant to paragraph (h) of this section, provided that such fishing is consistent with the following limitations.

(1) Subsistence fishing is limited to setline gear and hand-held gear, including longline, handline, rod and reel, spear, jig and hand-troll gear.

(i) Subsistence fishing gear must not have more than 30 hooks per person registered in accordance with paragraph (h) of this section and on board the vessel from which gear is being set or retrieved.

(ii) All setline gear marker buoys carried on board or used by any vessel regulated under this section shall be marked with the following: first initial, last name, and address (street, city, and state), followed by the letter "S" to indicate that it is used to harvest subsistence halibut.

(iii) Markings on setline marker buoys shall be in characters at least 4 inches (10.16 cm) in height and 0.5 inch (1.27 cm) in width in a contrasting color visible above the water line and shall be maintained so the markings are clearly visible.

(2) The daily retention of subsistence halibut in rural areas is limited to no more than 20 fish per person eligible to conduct subsistence fishing for halibut under paragraph (g) of this section.

APPENDIX B:

Letter Sent to Tribes about the Project

STATE OF ALASKA

FRANK MURKOWSKI, GOVERNOR

DEPARTMENT OF FISH AND GAME

DIVISION OF SUBSISTENCE

*333 Raspberry Road
ANCHORAGE, AK 99518-1599
PHONE: (907) 267-2353
FAX: (907) 267-2450*

December 20, 2005

TO:

SUBJECT: Subsistence Halibut Fishing and Harvest Survey

In December 2005, we informed you about the second year of the project conducted by the Division of Subsistence of ADF&G to estimate the subsistence harvests of halibut in Alaska. As part of a contract with the National Marine Fisheries Service (NMFS), in early 2005 we mailed a short (one-page) questionnaire to every person who obtained a subsistence halibut registration certificate (called a "SHARC") from NMFS. Through the survey, we collected information about participation in the fishery and the number of halibut, rockfish, and lingcod harvested for subsistence use in 2004. Participation in the survey was voluntary. Of the 13,813 SHARC holders, 8,524 (61.7 percent) completed the survey – an excellent response.

We have completed the final report for the project as part of our Technical Paper Series (No. 304). A copy will be mailed to you shortly. Enclosed is a short overview of the study findings. You can also obtain the overview and the complete report through the Division of Subsistence website at www.subsistence.adfg.state.ak.us. Please contact us if you have questions.

We also wanted to let you know that we will be doing the survey again beginning in late January 2006, to collect information about subsistence halibut harvests in 2005. Again, we'll be mailing a short questionnaire to every SHARC holder, and asking them to voluntarily fill it out and send it back to us (we pay the postage). We will again compile the harvest information in a report to NMFS that will be available to tribes and to the public. In our view, collecting and reporting accurate information about subsistence halibut harvests is important in supporting this fishery.

In addition to mailing out the survey forms, Division of Subsistence staff plan to visit some communities in 2006 to provide information about the subsistence halibut fishery program, and to encourage subsistence fishers to obtain registration cards (SHARCs) and

return the surveys. We will of course coordinate these visits with tribal governments. We will also coordinate collection of subsistence halibut harvest information with other subsistence projects taking place in some communities, such as the collection of harbor seal and sea lion harvest data in communities of southeast, southcentral, and southwest Alaska.

As we noted, an important feature of the subsistence halibut regulations is that eligible people who want to subsistence fish need to obtain a subsistence halibut registration certificate (called a "SHARC" for short). Applications are available from NMFS at the address below. People can also submit applications on the Internet by logging on to: www.fakr.noaa.gov/ram and following the links to the subsistence halibut program. We encourage you to get the word out about this program to your tribal members who subsistence fish for halibut. More information about the subsistence halibut fishing program is available from NMFS as follows:

On the Internet: www.fakr.noaa.gov/ram/subsistence/halibut.htm
By e-mail: RAM.Alaska@noaa.gov
By phone: 800-304-4846 (option #2)
By mail: Alaska Region, National Marine Fisheries Service
Restricted Access Management (RAM) Program
PO Box 21668
Juneau, AK 99802

We will develop public notices about our subsistence halibut harvest survey within the next month or so, and will be contacting tribes in communities that we would like to visit. Again, the survey form itself will be mailed in late January. In the meantime, if you have questions about our project, please contact me (see below), or contact Jim Simon in our Fairbanks office (907-459-7317; james_simon@fishgame.state.ak.us) or Mike Turek in our Juneau office (907-465-3617; mike_turek@fishgame.state.ak.us).

Sincerely,

James Fall
Regional Program Manager
907-267-2359
jim_fall@fishgame.state.ak.us

Enclosures: "Subsistence Harvests of Pacific Halibut in Alaska, 2004"

cc: Jim Simon, Mike Turek

APPENDIX C

News Release



State of Alaska
Frank H. Murkowski, Governor



DEPARTMENT OF FISH AND GAME
McKie Campbell, Commissioner

Sarah A. Gilbertson, Communications Director
P.O. Box 115526; Juneau, Alaska 99802 • Phone: (907) 465-6137 • Fax: (907) 465-2332

NEWS RELEASE

FOR IMMEDIATE RELEASE: January 31, 2006

No. 06-05

Contact: James Fall, Regional Program Manager, Division of Subsistence, (907) 267-2359; in Southeast Alaska, contact Mike Turek, Subsistence Resource Specialist, (907) 465-3617

Subsistence Division Conducts Halibut Fishery Mail Survey

(Juneau) – In early February, the Alaska Department of Fish & Game (ADF&G), Division of Subsistence, will mail a one-page survey form to everyone who has registered and received a Subsistence Halibut Registration Certificate (SHARC) from the National Marine Fisheries Service (NMFS). Survey recipients will be asked to indicate if they subsistence fished for halibut in 2005, how many halibut they harvested, and to return the form to ADF&G.

To ensure future subsistence halibut fishery decisions are based on reliable information, everyone who receives the survey is encouraged to take a few minutes to fill it out and return it to ADF&G. Accurate harvest information is essential for effective management and for providing future subsistence fishing opportunities. The study findings will be summarized at a community level and presented in a final written report available to the public in late 2006.

This year is the third year in an ongoing project to estimate subsistence halibut harvests in Alaska. Results of the research pertaining to 2003 and 2004 subsistence halibut harvests are available at the Division of Subsistence website at www.subsistence.adfg.state.ak.us, under "Publications."

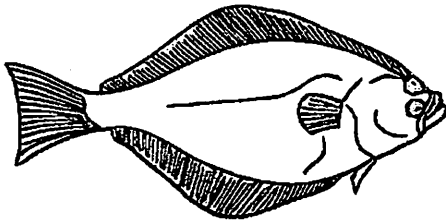
Questions about the survey should be addressed to James Fall or Brian Davis, Division of Subsistence, ADF&G; 333 Raspberry Road; Anchorage, Alaska 99518; Phone: (907) 267-2353; e-mail: jim_fall@fishgame.state.ak.us or brian_davis@fishgame.state.ak.us

In southeast Alaska, please contact Mike Turek, Division of Subsistence, ADF&G, PO Box 115526, Juneau, Alaska, 99802; Phone (907-465-3617); e-mail: mike_turek@fishgame.state.ak.us

Questions about subsistence halibut fishing regulations, including how to obtain a SHARC, should be addressed to NMFS at 1-800-304-4846 (option #2).

APPENDIX D

Newspaper Notice



NOTICE TO SUBSISTENCE HALIBUT FISHERS REGARDING MAIL-OUT HARVEST SURVEY

All holders of Subsistence Halibut Registration Certificates (SHARCs) will receive a one-page harvest survey in the mail from the Division of Subsistence of the Alaska Department of Fish and Game in late spring 2006. For a third year, the Division of Subsistence is collecting subsistence halibut information under contract to the National Marine Fisheries Service (NMFS). If you receive a survey form, you will be asked whether you subsistence fished for halibut in 2005 and how many halibut you harvested. Even if you did not fish, it is very important that you complete the survey and return it to ADF&G.

In April 2003, NMFS issued regulations that allow the harvest of halibut for subsistence purposes. Residents of 118 rural Alaska communities and 123 Alaska Native tribes with customary and traditional uses of halibut are eligible to participate once they obtain a SHARC from NMFS.

Accurate and complete subsistence harvest information is essential for proper management of the fishery and protection of future subsistence fishing opportunities. PLEASE fill out and return your survey form as soon as it arrives in the mail. Thank you for your support of this program!

Questions?

Contact NMFS:

- by phone: 1-800-304-4846 (option #2)
- on the Internet:
www.fakr.noaa.gov/ram/subsistence/halibut
- by mail:

Alaska Region, NMFS
Restricted Access Management Program
PO Box 21668
Juneau, Alaska 99518

Contact ADF&G, Division of Subsistence:

- by phone: 907-267-2353
- by e-mail:
subsistence_halibut@fishgame.state.ak.us
- by mail:

Division of Subsistence, ADF&G
333 Raspberry Road
Anchorage, AK 99518

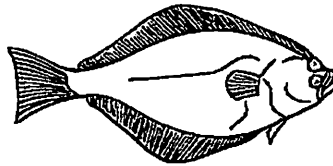


APPENDIX E

Survey Form

SUBSISTENCE HALIBUT HARVEST SURVEY 2005

National Marine Fisheries Service &
AK Dept. Fish & Game/Division of Subsistence



2
0
0
5

(Please make address changes as needed)

Fisher's Name			Date of Birth		
First name	M.I.	Last name	Mo.	Day	Year
Mailing Address					
Number and street or PO Box		City	State	Zip code	
Community of Residence			Daytime Telephone		SHARC Number
Tribe (if you are on a tribal role)					

Please answer each question to the best of your knowledge.

1. Did you subsistence fish for halibut during 2005? (Please check one) Yes No

2. How many halibut did you harvest with set hook gear (longline, skate) while subsistence fishing during 2005?
("Set hook gear" is hook-and-line set with anchors and buoys. Please write in both the number and pounds of halibut. Pounds should be round (live) weight.)

2a. Number of halibut	2b. Pounds of halibut	2c. How many hooks did you usually set?	2d. Water body, bay or sound usually fished
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

3. How many halibut did you harvest with hook-and-rod or hand-held lines while subsistence fishing during 2005?
(Please write in both the number and pounds of halibut. Do not count fish reported in Question 2. Pounds should be round (live) weight.)

3a. Number of halibut	3b. Pounds of halibut	3c. Water body, bay or sound usually fished
<input type="text"/>	<input type="text"/>	<input type="text"/>

4. How many lingcod and rockfish did you harvest while subsistence halibut fishing during 2005?
(Please write in numbers of fish only.)

4a. Number of lingcod	4b. Number of rockfish
<input type="text"/>	<input type="text"/>

5. Did you sport fish for halibut during 2005? (Please check one) Yes No

6. How many halibut did you harvest while sport fishing during 2005?

(Please write in both the number and pounds of halibut. Do not count fish reported in Question 3. Pounds should be round (live) weight.)

6a. Number of halibut	6b. Pounds of halibut	6c. Water body, bay or sound usually sport fished
<input type="text"/>	<input type="text"/>	<input type="text"/>

THANK YOU!

Please mail the completed survey to:
Subsistence Halibut Harvest Survey
Ak. Dept. Fish & Game/Div. of Subsistence
333 Raspberry Rd
Anchorage AK 99518-1599

QUESTIONS?

ADF&G 1-907-267-2353
NMFS at 1-800-304-4846 (option 2)
subsistence_halibut@fishgame.state.ak.us

APPENDIX F
Survey Instructions

Instructions for Subsistence Halibut Harvest Survey, 2005

PLEASE COMPLETE AND RETURN THE SURVEY EVEN IF YOUR SHARC HAS EXPIRED

Question 1.

- Mark “yes” even if you fished but were unsuccessful

Questions 2 and 3.

- Include only those fish harvested by you, the individual fisher (SHARC holder). If you fished with someone else and split the catch, count only your share of the catch. Other household members who harvested halibut should fill out their own forms.
- Include fish that you harvested and kept for your household’s use AND fish you harvested and gave away or traded. DO NOT include fish that you received from someone else.
- Identify both the number and pounds of halibut harvested; if you cannot provide both, please provide what you are able. Pounds should be **ROUND (LIVE) WEIGHT**. If you only know the dressed weight of your halibut harvest, record that number and make a note of “dressed, head on” (equals about 88% of round weight) or “dressed, head off” (equals about 75% of round weight).
- Number of hooks: write in the number that you use most often each time you set a line. That is, the number of hooks you usually have on your longline/skate.
- Water body, bay, or sound: record the general location where you did most of your subsistence halibut fishing (for example, “Chiniak Bay,” “Sitka Sound”). If you used more than one general area for a significant portion of your catch, please provide the portion of your harvest from each.

Question 4.

- DO NOT include all the lingcod and rockfish you harvested, but just those you harvested while subsistence halibut fishing.
- “Rockfish” means all fish of the genus *Sebastes*. These include fish with common English names such as red snapper, black bass, and sea bass.
- “Rockfish” DO NOT include sculpin, greenling, sablefish (black cod), tomcod, or Pacific cod. Please DO NOT include these other fish in your harvest estimates for rockfish.

Questions 5 and 6.

- Sport fishing for halibut requires an Alaska sport fishing license. Sport fishers for halibut must fish with a line attached to a rod or pole. There is a limit of two hooks. The daily bag limit is two halibut and the possession limit is four halibut.

Do you still have questions?

Call the National Marine Fisheries Service at: 1-800-304-4846 (option 2);

Or visit <http://www.fakr.noaa.gov/ram/subsistence/halibut.htm>;

Or call ADF&G Division of Subsistence at: 907-267-2353;

Or contact the Division of Subsistence via e-mail at: subsistence_halibut@fishgame.state.ak.us

APPENDIX G

Responses to Frequently Asked Questions

RAM: FAQ's for Subsistence Halibut Harvest Survey

The following is a list of standard responses that may be given to common questions regarding the Subsistence Halibut Harvest Survey. Any question that cannot be answered by the responses below or by other personnel in RAM division may be directed to ADF&G Division of Subsistence at the phone number(s) indicated at the bottom of the page.

1. I got my SHARC from NMFS. Why is this survey being done by ADF&G?

- NMFS contracted with ADF&G Division of Subsistence to conduct this survey because the Division of Subsistence has a lot of experience in collecting and analyzing subsistence harvest data. They have staff who are familiar with local communities and subsistence harvest patterns.

2. What happens to this information after I send it in?

- The survey responses are entered into a database by ADF&G. They will use the responses to estimate and report subsistence harvests at a community level. NMFS will receive a report from ADF&G with the survey results. The report will not include individual responses.

3. Why do you need my birth date?

- ADF&G needs birth date only to distinguish between individuals who may have the same name. For instance, there may be many John Smith's in area 2C. Providing birth date prevents ADF&G from counting the same person more than once or even counting multiple people as the same person. However, ADF&G is required to maintain birth date confidential under the Privacy Act.

4. I live in an isolated area near [insert]. What do I put down as my Community of Residence?

- Your Community of Residence is defined as the geographical location of your home. If you live in a remote location, you may list the community nearest your home. "Community of residence" is not necessarily the same as where you receive your mail.

5. The survey asks me to put down Pounds of Halibut. Does this mean I should weigh all my halibut on a scale?

- No. While an actual weight using a scale would be helpful to ADF&G, you only need to estimate the total pounds of halibut you harvested. If you know how many halibut you harvested, but have no idea how much they weighed, leave the "pounds" area blank. If you know about how many pounds you harvested but have no idea how many fish you caught, leave the "number" area blank. We will calculate the pounds or number based on standard conversion factors. However, we prefer that you do your best to provide an estimate of both numbers and pounds, because this information is lacking for the subsistence fishery.

6. Should I record the weight of my halibut before or after I process them?

- The survey asks for **ROUND WEIGHT**, which is the weight of the fish **BEFORE** it is gutted and beheaded. If you only know the approximate weight of the fish after you gutted them, write "dressed, head on" next to the weight (this equals about 88% of round/live weight). If you only know the approximate weight of the fish after you gutted and beheaded them, write "dressed, head off" next to the weight (this equals about 72% of round/live weight).

7. I fish near [insert]. What is the water body, bay, or sound?

- The water body, bay, or sound is the area in which you subsistence fished for halibut. For instance, a subsistence fisher from Sitka might put down that he subsistence fished for halibut in Sitka *Sound* or a subsistence fisher from Kodiak might put down that he subsistence fished for halibut in Chiniak *Bay*. However, a subsistence fisher from Akutan might put down that he subsistence fished for halibut in Unimak Pass, which is neither a bay nor sound but would be classified as a *water body*. Likewise, a subsistence fisher from St. Paul might put down that he subsistence fished for halibut in the Bering Sea, which is also a *water body*. However, the more specific the description, the more helpful it will be to ADF&G.

8. What is a lingcod?

- A lingcod is a relatively long fish that ranges from black, to grey, to greenish, to bluish-purple, usually with dark brown or copper blotches arranged in clusters, and has a large mouth with 18 large teeth. For a more accurate description and local or tribal names, you can refer to the sheet distributed by ADF&G in the original mailing that also contained your Subsistence Halibut Harvest Survey or visit the NMFS website http://www.afsc.noaa.gov/race/media/photo_gallery/fish_by_family.htm.

9. What is a rockfish?

- These fish are characterized by having bony plates or spines on the head and body and a large mouth. Some species are brightly colored, and many are difficult to distinguish from one another. They are also known as sea bass, black bass, and red snapper. For a more accurate description and local or tribal names, you can refer to the instruction sheet distributed by ADF&G in the original mailing that also contained your Subsistence Halibut Harvest Survey or visit the NMFS website http://www.afsc.noaa.gov/race/media/photo_gallery/fish_by_family.htm.

10. What is "sport fishing"?

- Sport fishing is defined as all fishing other than commercial fishing, personal use fishing, and subsistence fishing. Typically, sport fishing is conducted with a rod and reel using no more than 2 hooks under ADF&G regulations.

11. Why do I need to report my sport-caught halibut on this subsistence harvest survey form (Question 6)?

- The survey is designed to prevent double-counting of harvested halibut. If you fish for halibut with a rod and reel and have a sport fishing license, you may include your harvests in Question 2 if you consider your activity to be subsistence fishing, or under Question 6 if you consider it sport fishing. **DO NOT INCLUDE THE SAME FISH IN YOUR REPSONSES TO QUESTIONS 2 AND 6.** We will exclude responses to Question 6 from our estimate of subsistence halibut harvests. Holders of sport fishing licenses may receive a survey from ADF&G about their sport harvests. If you do, you should report the halibut you record in Question 6 in that survey too, but do not include the halibut you record in Question 2.

All other inquiries regarding the survey should be directed to ADF&G Division of Subsistence at (907) 267-2353 (Anchorage) or 907-465-3617, or e-mail at subsistence_halibut@fishgame.state.ak.us

APPENDIX H

Project Summary

[A 4-page project findings summary will be prepared and distributed in December 2006. A copy will be included in the final report.]

APPENDIX I

Findings from the Supplemental Mailing to SHARC Holders from Kodiak and Sitka, 2005

Prepared by:

Division of Subsistence
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, AK 99518
907-267-2353

Funded through a cooperative agreement between the Division of Subsistence, ADF&G,
and the National Marine Fisheries Service (Award Number NA04NMF4370314).

January 13, 2006

CONTENTS

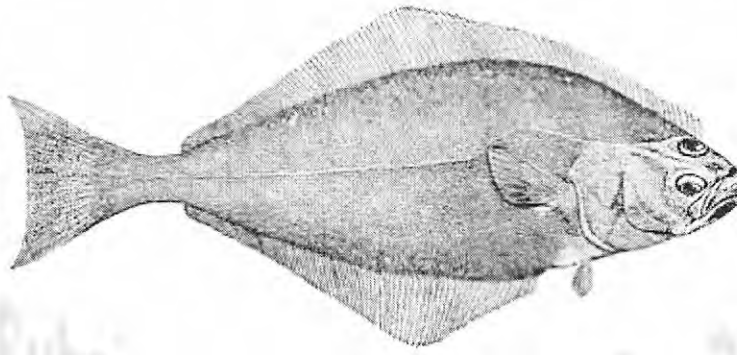
Copy of Supplemental SHARC Survey Form

List of Tables

Table 1.	Sample Achievement, Supplemental Mailing.....
Table 2.	Reported Number and Percentage of SHARC Holders Fishing in Each Month, 2004.....
Table 3.	Reported Number and Percentage of Halibut Harvested by Month, 2004
Table 4.	Reasons for Classifying Halibut Harvests as Subsistence or Sport
Table 5.	Respondents' Evaluation of How Well They Understand Subsistence Halibut Regulations: Kodiak.....
Table 6.	Respondents' Evaluation of How Well They Understand Subsistence Halibut Regulations: Sitka
Table 7.	Locations of Landing Halibut: Kodiak
Table 8.	Locations of Landing Halibut: Sitka

List of Figures

Figure A.	Percentage of Subsistence Halibut Fishers Who Fished by Month, Sitka and Kodiak, 2004
Figure B.	Percentage of Halibut Harvest by Subsistence Fishers by Month, Sitka and Kodiak, 2004
Figure C.	Reasons Used by Respondents to Distinguish between Sport and Subsistence Halibut Harvests, Kodiak and Sitka
Figure D.	Percentage of Respondents Who Rated Their Understanding of Subsistence Halibut fishing Regulations as "Excellent" (5) or "Very Good" (4)



Please Respond
by October 1,
2005!

Subsistence Halibut Fishing Detail

Hello SHARC- Registrant! Thank you for responding to our 2004 harvest survey, and helping with the research needed to support the subsistence harvest program. As you probably know, the Alaska Department of Fish and Game Subsistence Division has no role in regulations, only research. This follow-up survey is designed to add to some detail to our harvest estimates.

We hope you will be as generous with your time as you were in the past. Don't worry about how well you remember 2004...just answer the best that you can. We're just looking for cooperative and supportive SHARC-holders who are patient enough to give us this detail, and help us design future surveys. This is confidential, and your individual responses will be combined with all others. THANK YOU AGAIN in advance!

You can contact the Subsistence Division at 907-267-2358 if you have any questions about the research, or the National Marine Fisheries Service at 800-304-4846 about the SHARC registration or rules.

Last Name «LAST_NAME» ..NAME_SUFFIX..	First Name «FIRST_NAME»	Middle Initial «MIDDLE_INITIAL»
Street «MAILING_ADDRESS»		
City «CITY»	State «STATE»	Zip «ZIP_CODE»

Number of Fish Harvested 2004

SHARC Number

«SHARC_ID»

Subsistence: «SUBSISTENCE_HALIBUT»

Sport: «SPORT_HALIBUT»

1 What community is nearby most or all of your landing locations?

- Sitka Kodiak
 Other _____

2 If you caught both subsistence and sport halibut, what factors did you use to decide if they were subsistence or sport fish?

3 Thinking back to the 2004 fishing season, in what location, and in which month, did you bring each subsistence fish onto shore? A reminder of the fish you reported appears on the other side of the survey form. Please list a landing site for each halibut you harvested. Please list up to 20 fish and landing locations. Be as specific as you can.

Halibut	Location Brought to Land	Month Caught
Sample for one Halibut	SHORE 1.5 MILES N. OF CITY DOCK	JUN
Halibut #1		
Halibut #2		
Halibut #3		
Halibut #4		
Halibut #5		
Halibut #6		

Halibut	Location Brought to Land	Month Caught
Halibut #7		
Halibut #8		
Halibut #9		
Halibut #10		
Halibut #11		
Halibut #12		
Halibut #13		

Halibut	Location Brought to Land	Month Caught
Halibut #14		
Halibut #15		
Halibut #16		
Halibut #17		
Halibut #18		
Halibut #19		
Halibut #20		

4 How well do you think you understand the National Marine Fisheries SHARC Guidelines? Please rate the following with "5" as excellent, and "1" as poor.

Rules	5	4	3	2	1
Gear Types	5	4	3	2	1
Number of Hooks	5	4	3	2	1
Daily Limits	5	4	3	2	1
Fishing Areas	5	4	3	2	1
Seasons	5	4	3	2	1
Eligibility	5	4	3	2	1
Registration Process	5	4	3	2	1

5 Is there anything else you'd like to add about subsistence halibut fishing patterns, or comments on the SHARC Program? Add another page if you'd like.

Table 1. Sample Achievement, Supplemental Mailing

	Kodiak	Sitka	Total
Number of surveys mailed*	536	572	1108
Number of Surveys Returned	256	246	502
Responses from other community**	5	5	10
Adjusted	251	241	492
Adjusted reponse rate	47.3%	42.5%	44.8%

* Surveys were mailed to all respondents to the previous mailings who fished

** Responses from SHARC holders who had moved from Kodiak or Sitka; not included in analysis

Source: Division of Subsistence, ADF&G, SHARC Survey Supplemental Mailing, August/September 2005

Table 2. Reported Number and Percentage of SHARC Holders Fishing in Each Month, 2004

Total Surveys Returned		Kodiak	Sitka	All Communities
		251.0	241.0	492.0
January	No.	1	0	1
	Pctg.	0.40%	0.00%	0.20%
February	No.	0	2	2
	Pctg.	0.00%	0.83%	0.41%
March	No.	1	2	3
	Pctg.	0.40%	0.83%	0.61%
April	No.	4	9	13
	Pctg.	1.59%	3.73%	2.64%
May	No.	19	33	52
	Pctg.	7.57%	13.69%	10.57%
June	No.	65	73	138
	Pctg.	25.90%	30.29%	28.05%
July	No.	113	108	221
	Pctg.	45.02%	44.81%	44.92%
August	No.	94	89	183
	Pctg.	37.45%	36.93%	37.20%
September	No.	46	27	73
	Pctg.	18.33%	11.20%	14.84%
October	No.	5	4	9
	Pctg.	1.99%	1.66%	1.83%
November	No.	1	5	6
	Pctg.	0.40%	2.07%	1.22%
December	No.	0	0	0
	Pctg.	0.00%	0.00%	0.00%
Unknown	No.	18	18	36
	Pctg.	7.17%	7.47%	7.32%

Note: Percentages may not sum to 100% because SHARC holders may have fished in multiple months.

Source: Division of Subsistence, ADF&G, Supplemental SHARC Survey, August/September 2005

Table 3. Reported Number and Percentage of Halibut Harvested by Month, 2004

		Kodiak	Sitka	All Communities
All Months	No.	1461.0	1278.0	2739.0
	Pctg.	100.00%	100.00%	100.00%
January	No.	7	0	7.0
	Pctg.	0.48%	0.00%	0.25%
February	No.	0	3	3.0
	Pctg.	0.00%	0.23%	0.11%
March	No.	4	2	6.0
	Pctg.	0.27%	0.16%	0.22%
April	No.	17	17	34.0
	Pctg.	1.16%	1.33%	1.22%
May	No.	62	108	170.0
	Pctg.	4.24%	8.45%	6.19%
June	No.	242	237	479.0
	Pctg.	16.56%	18.54%	17.70%
July	No.	480	379	859.0
	Pctg.	32.85%	29.66%	31.81%
August	No.	335	361	696.0
	Pctg.	22.93%	28.25%	25.04%
September	No.	185	86	271.0
	Pctg.	12.66%	6.73%	9.75%
October	No.	17	10	27.0
	Pctg.	1.16%	0.78%	0.97%
November	No.	4	8	12.0
	Pctg.	0.27%	0.63%	0.43%
December	No.	0	0	0.0
	Pctg.	0.00%	0.00%	0.00%
Unknown	No.	108	67	175.0
	Pctg.	7.39%	5.24%	6.30%

Source: Alaska Department of Fish and Game, Division of Subsistence
Supplemental SHARC Survey, August/September 2005

Table 4. Reasons for Classifying Halibut Harvests as Subsistence or Sport

Community	Mailed Surveys	Valid Responses	Percentage of Valid Responses ¹					
			Gear	Social	Amount Harvested	Fish Use	Cultural/Lifestyle	Other
Kodiak	531	113	59.3%	17.7%	12.4%	12.4%	7.1%	1.8%
Sitka	567	82	81.7%	4.9%	6.1%	11.0%	7.3%	1.2%
Overall	1098	195	68.7%	12.3%	9.7%	11.8%	7.2%	1.5%

¹ Total exceeds 100% because respondents could give more than one reason.

Source: Alaska Department of Fish and Game, Division of Subsistence Supplemental SHARC Survey, August/Sep-05

125

Table 5. Respondents' Evaluation of How Well They Understand Subsistence Halibut Regulations: Kodiak

	Surveys Returned	Valid Responses		No Response		SHARC holders responding to how well they understand the NMFS SHARC Guidelines									
						1 (Poor)		2		3		4		5 (Excellent)	
						No.	Pctg.	No.	Pctg.	No.	Pctg.	No.	Pctg.	No.	Pctg.
Daily Limits	251	223	88.8%	28	11.2%	10	4.5%	8	3.6%	29	13.0%	45	20.2%	131	58.7%
Eligibility	251	223	88.8%	28	11.2%	9	4.0%	7	3.1%	35	15.7%	44	19.7%	128	57.4%
Fishing Areas	251	223	88.8%	28	11.2%	11	4.9%	7	3.1%	44	19.7%	60	26.9%	101	45.3%
Gear Types	251	225	89.6%	26	10.4%	9	4.0%	8	3.6%	37	16.4%	49	21.8%	122	54.2%
Number of Hooks	251	227	90.4%	24	9.6%	8	3.5%	10	4.4%	26	11.5%	45	19.8%	138	60.8%
Registration	251	223	88.8%	28	11.2%	8	3.6%	8	3.6%	35	15.7%	52	23.3%	120	53.8%
Seasons	251	222	88.4%	29	11.6%	11	5.0%	11	5.0%	38	17.1%	49	22.1%	113	50.9%

Source: Alaska Department of Fish and Game, Division of Subsistence Supplemental SHARC Survey, August/September 2005

Table 6. Respondents' Evaluation of How Well They Understand Subsistence Halibut Regulations: Sitka

	Surveys Returned	Valid Responses			No Response		SHARC holders responding to how well they understand the NMFS SHARC Guidelines									
							1 (Poor)		2		3		4		5 (Excellent)	
							No.	Pctg.	No.	Pctg.	No.	Pctg.	No.	Pctg.	No.	Pctg.
Daily Limits	241	217	90.0%	24	10.0%	14	6.5%	12	5.5%	38	17.5%	42	19.4%	111	51.2%	
Eligibility	241	217	90.0%	24	10.0%	2	0.9%	16	7.4%	30	13.8%	42	19.4%	127	58.5%	
Fishing Areas	241	215	89.2%	26	10.8%	11	5.1%	18	8.4%	46	21.4%	46	21.4%	94	43.7%	
Gear Types	241	215	89.2%	26	10.8%	7	3.3%	8	3.7%	34	15.8%	48	22.3%	118	54.9%	
Number of Hooks	241	218	90.5%	23	9.5%	10	4.6%	10	4.6%	35	16.1%	39	17.9%	124	56.9%	
Registration	241	217	90.0%	24	10.0%	5	2.3%	17	7.8%	24	11.1%	42	19.4%	129	59.4%	
Seasons	241	216	89.6%	25	10.4%	12	5.6%	18	8.3%	47	21.8%	39	18.1%	100	46.3%	

Source: Alaska Department of Fish and Game, Division of Subsistence Supplemental SHARC Survey, August/September 2005

Table 7. Locations of Landing Halibut, Kodiak, 2004

Location Brought to Land	Percent of Landings by SHARC	Percent of Landings by Halibut
City Dock/Kodiak Harbor/Kodiak	16.33%	16.08%
Near Island/Near Island Harbor/Near Island Boat Ramp	1.99%	3.08%
Chiniak area	15.14%	13.14%
Dog Bay/Dog Bay Marina/Dog Marina	7.57%	8.83%
Pasagshak/Pasagshack/X Miles from Pasagshak	6.37%	4.45%
Settlers Cove	0.40%	0.07%
Other Locations Reported		
Buoy 4/Buoy 3/Buoy #4	16.73%	10.47%
Long Island	7.57%	5.95%
Woody Island	0.80%	0.34%
Uyak Bay	1.99%	3.15%
Whale Pass	3.19%	2.67%
Danger Bay	2.79%	1.71%
Marmot Bay	3.98%	2.33%
Olga Bay	0.80%	0.62%
Kalsin Bay	5.18%	3.90%
Kodiak Shoreline	5.18%	6.30%
Other Waters Near Kodiak	11.55%	7.12%
Buskin River/Beach	1.99%	1.44%
x. Miles From Town	2.39%	0.89%
Anton Larsen Bay, Ouzinkie	5.58%	3.01%
Uganik Bay/Island	1.59%	1.23%
Williams Reef	0.80%	0.14%
Woody Island	1.99%	1.37%
Abercrombie	0.40%	0.07%
Popof Island	1.20%	1.37%
Middle Bay	0.40%	0.07%
Izhut Bay	0.40%	0.14%
Missing/Unknown	0.40%	0.07%

Source: Alaska Department of Fish and Game, Division of Subsistence Supplemental SHARC Survey, 2005

Table 8. Locations of Landing Halibut, Sitka, 2004

Location Brought to Land	Percent of Landings by SHARC	Percent of Landings by Halibut
City Dock/Sitka/Sitka Dock	10.37%	13.93%
Sealing Cove Harbor/Sealing Cove	12.45%	16.20%
Crescent Harbor	5.81%	4.85%
Old Thompson Harbor/New Thompson Harbor	9.96%	10.02%
ANB Harbor	1.24%	1.56%
False Island Dock	0.41%	0.31%
Starigavan Boat Launch	2.07%	1.96%
Other Locations Reported		
Katlian Bay	1.66%	0.78%
Sitka Sound	7.05%	4.85%
Nakwasina	2.07%	1.02%
Fish Bay	1.66%	1.64%
Dog Bay	0.41%	0.23%
Middle Island	5.39%	3.68%
Biorka Island	6.22%	4.07%
Hoonah Sound	2.90%	1.49%
Vitskari Rock	5.39%	3.44%
Rodman Bay	0.83%	0.63%
Eastern Channel	2.90%	2.19%
Islands/Waters Near Sitka	22.82%	17.14%
Krestof Sound	1.66%	0.55%
Shores Around Sitka	8.30%	5.16%
Silver Bay	0.83%	0.39%
Hayward Strait	1.24%	0.39%
Necker Bay	1.24%	0.78%
Salisbury Sound	2.49%	0.94%
Outside of Gilmer Bay, Krousuzok Island	0.83%	0.94%
Missing/Unknown	2.49%	0.55%

Source: Alaska Department of Fish and Game, Division of Subsistence Supplemental SHARC Survey, 2005

Figure A. Percentage of Subsistence Halibut Fishers Who Fished by Month, Sitka and Kodiak, 2004

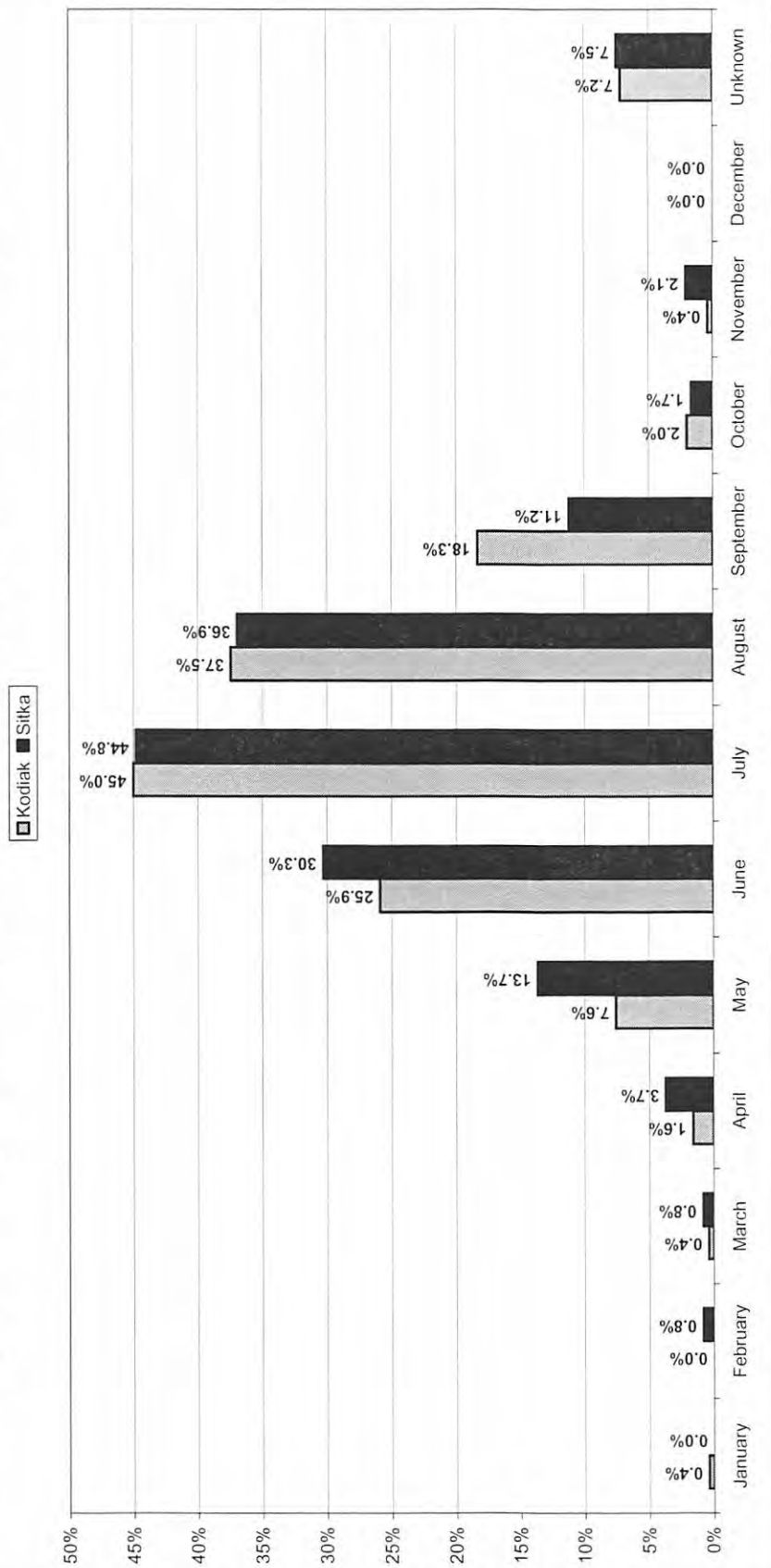


Figure B. Percentage of Halibut Harvest by Subsistence Fishers by Month, Sitka and Kodiak, 2004

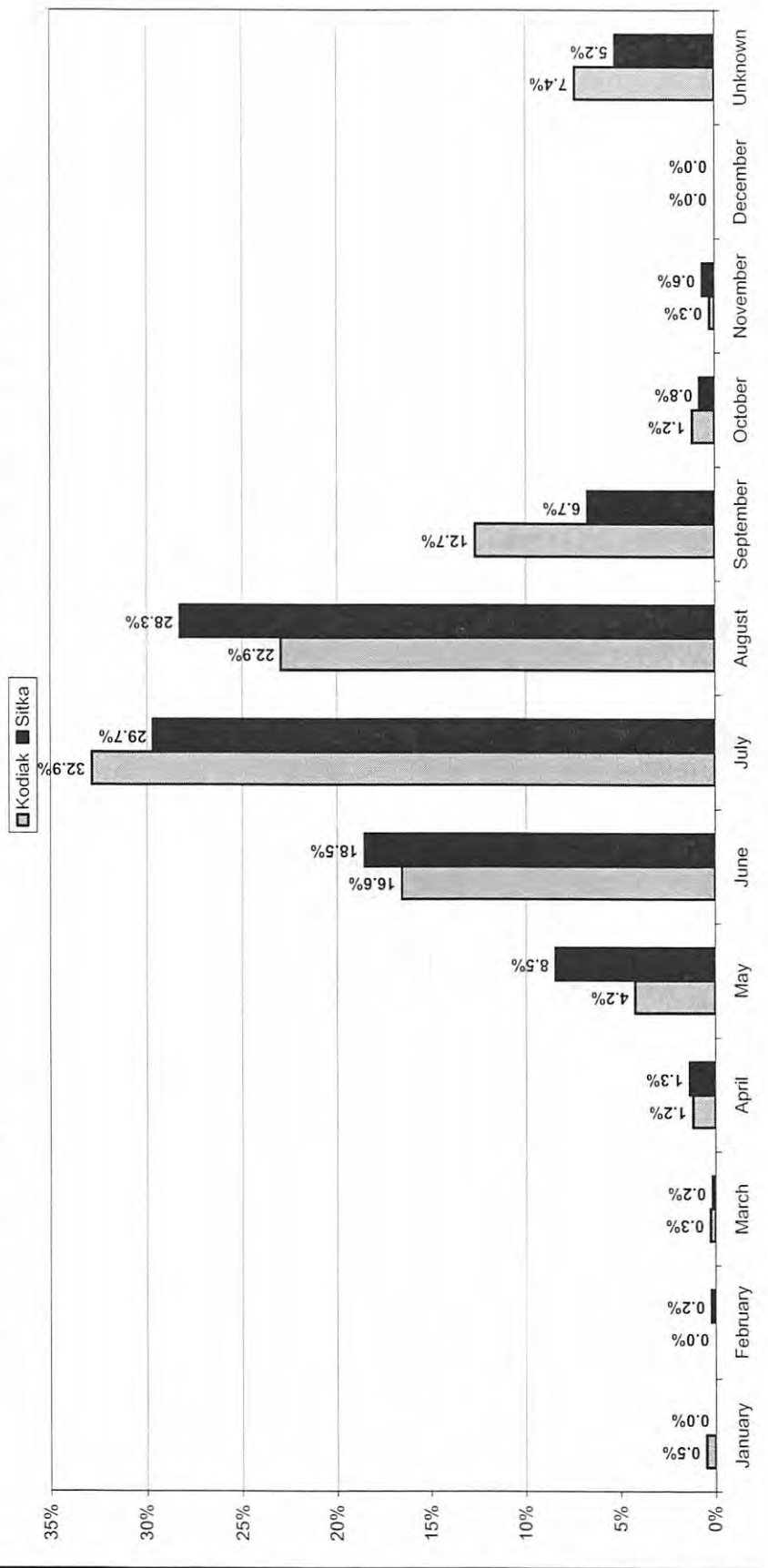


Figure C. Reasons Used by Respondents to Distinguish between Sport and Subsistence Halibut Harvests, Kodiak and Sitka

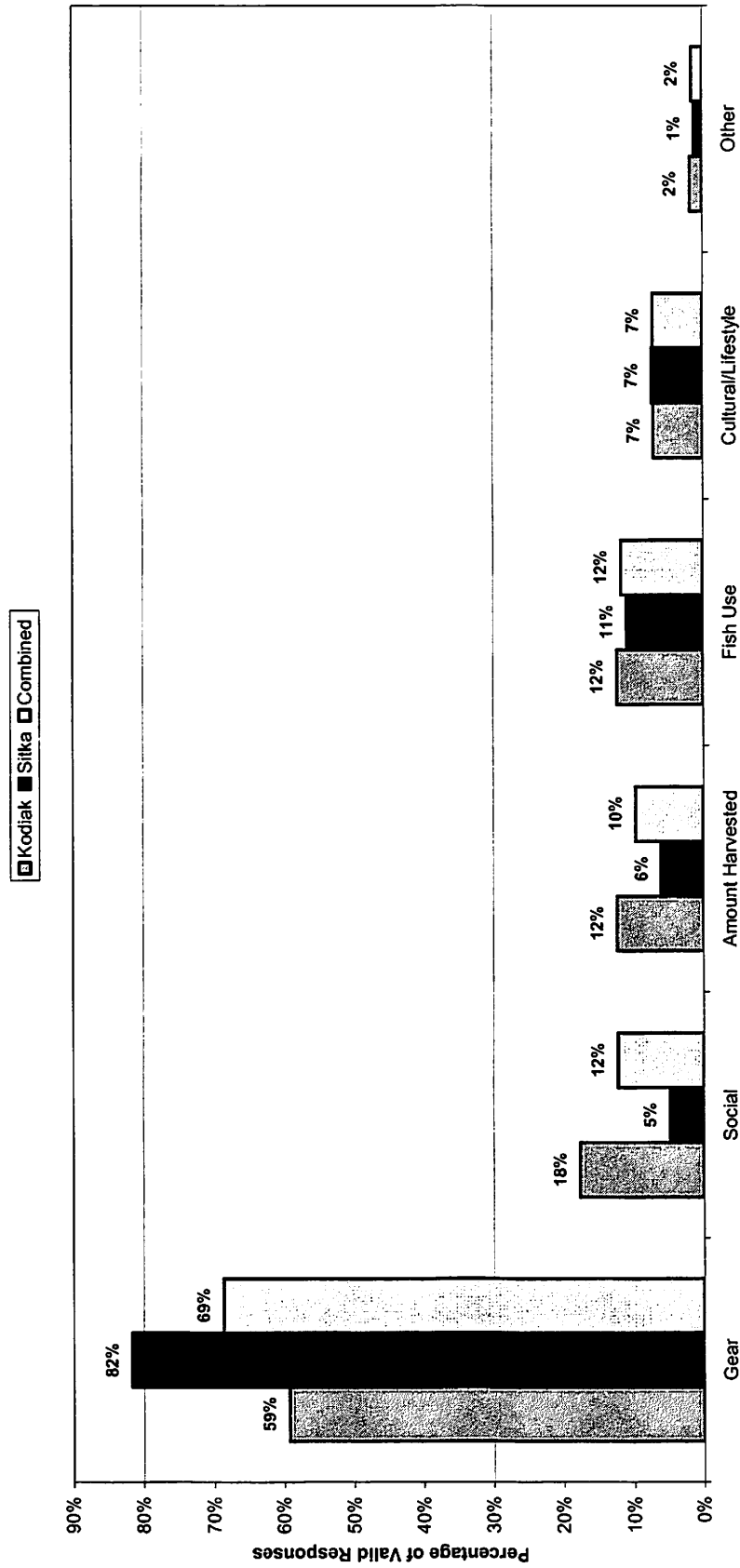
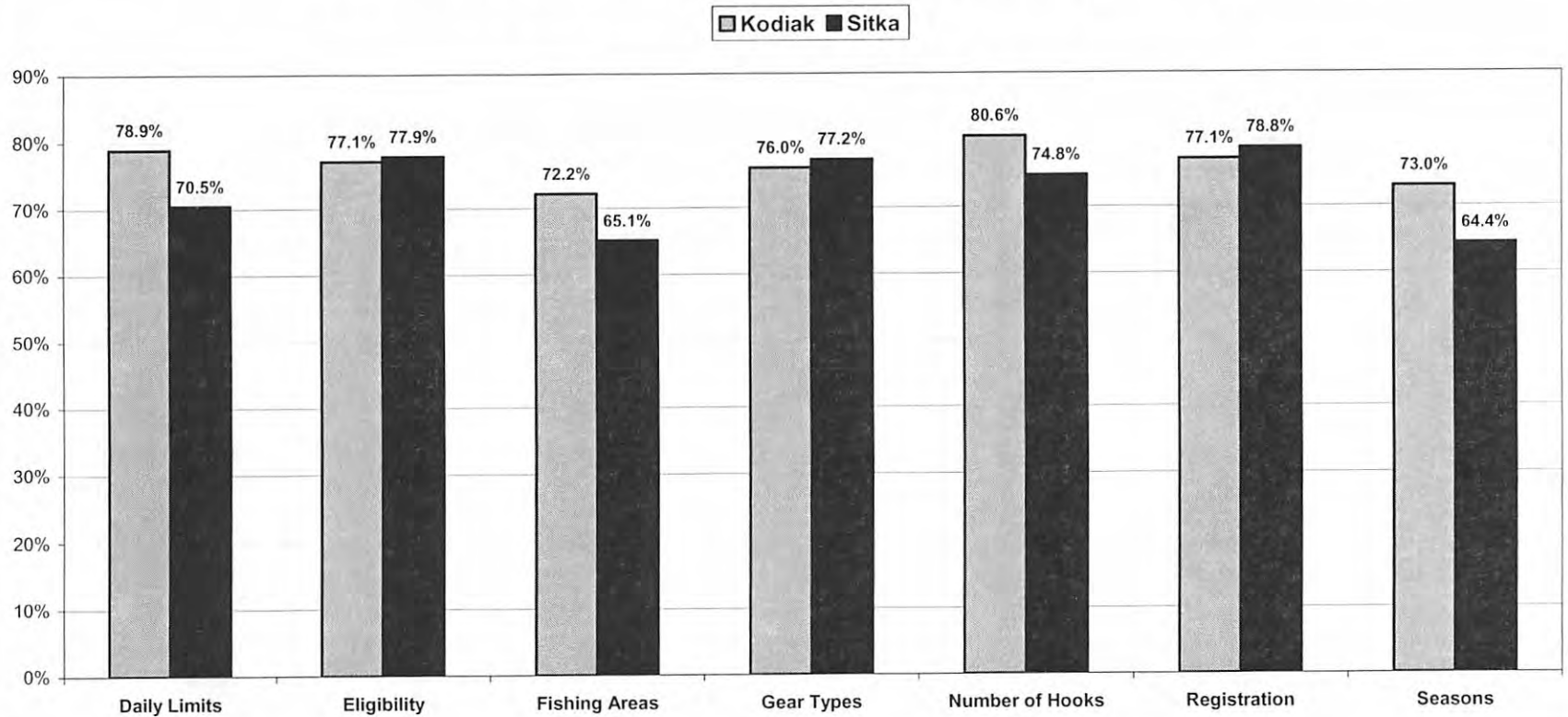


Figure D. Percentage of Resondents Who Rated Their Understanding of Subsistence Halibut Fishing Regulations as "Excellent" (5) or "Very Good" (4)



APPENDIX J

Appendix Tables

Appendix Table 1. [continued]

Tribal Name ¹	Return Rate			Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
	SHARCS Issued ²	Surveys Returned	Percent Returned	Number Respondents	Percent Respondents	Number Halibut	Pounds Halibut ³	Number Respondents	Percent Respondents	Number Halibut	Pounds Halibut ³	Number Respondents	Number Lingcod	Number Respondents	Number Rockfish
NATIVE VILLAGE OF SHAKTOOLIK	1														
NATIVE VILLAGE OF SHISHMAREF	1														
NATIVE VILLAGE OF TATITLEK	32	18	56.3%	10	55.6%	112	3,880	0	0.0%	0	0	3	4	8	88
NATIVE VILLAGE OF TOKSOOK BAY (NUNAKAUYAK)	527	154	29.2%	60	39.0%	1,135	19,707	2	1.3%	5	130	2	8	1	6
NATIVE VILLAGE OF TUNUNAK	73	34	46.6%	21	61.8%	303	3,618	0	0.0%	0	0	0	0	0	0
NATIVE VILLAGE OF UNALAKLEET	5														
NATIVE VILLAGE OF UNGA	8	5	62.5%	2	40.0%	5	136	0	0.0%	0	0	0	0	0	0
NATIVE VILLAGE OF WHITE MOUNTAIN	2														
NEWTOK VILLAGE	3														
NINILCHIK VILLAGE	96	45	46.9%	13	28.9%	238	8,076	13	28.9%	49	1,169	2	27	3	229
NOME ESKIMO COMMUNITY	15	4	26.7%	0	0.0%	0	0	3	75.0%	32	954	0	0	0	0
ORGANIZED VILLAGE OF KAKE	113	56	49.6%	15	26.8%	247	7,655	3	5.4%	23	745	1	2	3	25
ORGANIZED VILLAGE OF KASAAN	8	4	50.0%	3	75.0%	39	1,405	2	50.0%	0	0	2	11	2	27
ORGANIZED VILLAGE OF SAXMAN	59	33	55.9%	14	42.4%	158	18,370	4	12.1%	2	120	1	2	2	11
ORUTSARARMUIT NATIVE VILLAGE	8	4	50.0%	1	25.0%	5	180	0	0.0%	0	0	1	2	1	3
PAULOFF HARBOR VILLAGE	53	18	34.0%	5	27.8%	122	3,930	0	0.0%	0	0	2	6	2	13
PETERSBURG INDIAN ASSOCIATION	118	68	57.6%	20	29.4%	126	3,084	15	22.1%	33	835	1	1	2	5
PLATINUM TRADITIONAL VILLAGE	1														
PRIBILOF ISLANDS ALEUT COMMUNITY OF ST GEORGE	25	5	20.0%	2	40.0%	18	480	0	0.0%	0	0	0	0	0	0
PRIBILOF ISLANDS ALEUT COMMUNITY OF ST PAUL	224	175	78.1%	16	9.1%	261	7,695	1	0.6%	4	350	2	9	3	134
QAGAN TOYAGUNGIN TRIBE OF SAND POINT VILLAGE	264	90	34.1%	27	30.0%	371	6,320	6	6.7%	7	130	0	0	3	76
QAWALINGIN TRIBE OF UNALASKA	31	11	35.5%	6	54.5%	47	1,020	0	0.0%	0	0	2	10	2	22
SELDOVIA VILLAGE TRIBE	41	29	70.7%	13	44.8%	205	5,270	9	31.0%	40	1,030	1	1	3	10
SHOONAQ TRIBE OF KODIAK	155	95	61.3%	52	54.7%	698	21,480	23	24.2%	99	3,656	4	6	9	163
SITKA TRIBE OF ALASKA	436	262	60.1%	89	34.0%	669	22,829	24	9.2%	89	2,474	17	102	29	283
SKAGWAY VILLAGE	1														
SOUTH NAKNEK VILLAGE	2														
TRADITIONAL VILLAGE OF TOGIAK	11	4	36.4%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0
UGASHIK VILLAGE	4														
VILLAGE OF CHEFORNAK	17	14	82.4%	11	78.6%	221	2,988	0	0.0%	0	0	0	0	0	0
VILLAGE OF CLARK'S POINT	3														
VILLAGE OF KANATAK	8	1	12.5%	0	0.0%	0	0	1	100.0%	8	200	0	0	0	0
VILLAGE OF OLD HARBOR	45	18	40.0%	12	66.7%	58	1,803	4	22.2%	11	370	0	0	0	0
VILLAGE OF SALAMATOFF	13	10	76.9%	2	20.0%	16	670	2	20.0%	10	330	2	5	2	6
WRANGELL COOPERATIVE ASSOCIATION	97	67	69.1%	24	35.8%	247	7,443	18	26.9%	46	1,433	2	22	3	122
YAKUTAT TLINGIT TRIBE	58	30	51.7%	17	56.7%	259	10,595	3	10.0%	14	620	8	83	5	64
Tribal Name Subtotals	6,437	3,120	48.5%	1,070	34.3%	12,059	350,637	408	13.1%	1,421	43,698	140	836	251	3,894

Rural Community ¹	Return Rate			Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
	SHARCS Issued ²	Surveys Returned	Percent Returned	Number Respondents	Percent Respondents	Number Halibut	Pounds Halibut ³	Number Respondents	Percent Respondents	Number Halibut	Pounds Halibut ³	Number Respondents	Number Lingcod	Number Respondents	Number Rockfish
ADAK	13	10	76.9%	2	20.0%	15	640	0	0.0%	0	0	0	0	1	10
AKHIOK	1														
AKUTAN	4														
ALEKNAGIK	4														
ANGOON	33	21	63.6%	11	52.4%	120	3,679	3	14.3%	6	240	1	10	6	65
ATKA	12	4	33.3%	1	25.0%	4	265	0	0.0%	0	0	0	0	2	63
BETHEL	5														
CHEFORNAK	3														
CHENEGA BAY	12	7	58.3%	4	57.1%	152	3,322	3	42.9%	17	371	2	9	3	90
CHEVAK	5														
CHIGNIK	11	9	81.8%	6	66.7%	53	1,393	2	22.2%	3	133	2	4	2	20
CHIGNIK LAGOON	10	4	40.0%	4	100.0%	28	1,123	0	0.0%	0	0	0	0	1	6
CHIGNIK LAKE	4														
CHINIAC	2														
CLARKS POINT	1														

[continued]

Community	Return Rate		Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Pounds	Number	Percent	Number	Percent
COFFMAN COVE	45	84.4%	22	57.9%	237	5.8%	14	38.8%	54	1,220	1	1	1	5
COLD BAY	21	47.6%	7	70.0%	127	2.0%	5	50.0%	42	1,108	1	1	0	0
CORROVA	542	70.3%	177	46.5%	1,634	38,328	119	31.2%	366	8,996	21	53	41	316
CRAG	352	69.0%	119	49.0%	1,305	28,984	95	39.1%	563	10,540	33	83	57	736
DILLINGHAM	44	79.5%	5	14.3%	16	494	2	5.7%	0	0	0	0	1	2
EAK	1	1	21	52.5%	123	4,661	12	30.0%	34	1,185	4	11	11	132
EDNA BAY	52	76.9%	40	76.9%	1	1	1	1	0	0	4	4	11	11
ELFIN COVE	20	70.0%	14	70.0%	35	635	1	7.1%	2	160	0	0	1	1
EMMONAK	1	1	1	1	1	1	1	1	0	0	0	0	0	0
FALSE PASS	5	5	5	5	5	5	5	5	5	5	5	5	5	5
GAMBELL	1	1	1	1	1	1	1	1	1	1	1	1	1	1
GOODNEWS BAY	2	2	2	2	2	2	2	2	2	2	2	2	2	2
GUZTAVUS	76	75.0%	57	75.0%	274	7,035	22	38.6%	92	2,667	2	5	4	16
HAINES	477	81.1%	387	81.1%	192	49.6%	80	20.7%	115	3,527	8	103	22	103
HOLLIS	52	71.2%	37	64.9%	145	4,411	10	27.0%	15	361	6	50	6	50
HOOAH	141	64.5%	37	40.7%	390	9,358	30	33.0%	182	4,245	2	4	7	104
HOOVER BAY	8	62.5%	5	0.0%	0	0	0	0.0%	0	0	0	0	0	0
HYDABURG	18	94.4%	7	41.2%	1,360	25	35.3%	4	270	6	6	6	104	
HYDER	39	76.9%	16	53.3%	2,452	68	13.3%	4	450	8	8	31	31	
KAYE	54	64.8%	20	57.1%	7,689	224	28.6%	10	1,082	6	6	6	68	
KASAPAN	20	60.0%	7	58.3%	2,030	52	33.3%	4	6	215	0	26	26	
KETCHIKAN	2	2	2	2	2	2	2	2	2	2	2	2	2	
KING COVE	23	78.3%	8	44.4%	140	5,037	5	27.8%	20	388	1	35	4	35
KING SALMON	5	5	5	5	5	5	5	5	5	5	5	5	5	
KIPNUK	1	1	1	1	1	1	1	1	1	1	1	1	1	
KLAWOCK	127	68.5%	87	68.5%	427	11,543	37	42.5%	211	4,468	17	22	298	
KLUKWAN	3	3	3	3	3	3	3	3	3	3	3	3	3	
KODIAK	1,538	64.8%	996	64.8%	6,624	171,900	429	43.1%	2,570	71,772	64	112	1,251	
KONGIGANAK	3	3	3	3	3	3	3	3	3	3	3	3	3	
KOTLIK	1	1	1	1	1	1	1	1	1	1	1	1	1	
KOYUK	1	1	1	1	1	1	1	1	1	1	1	1	1	
LARSEN BAY	16	75.0%	12	75.0%	1,825	85	33.3%	41	1,455	2	49	3	49	
MANOKOTAK	2	2	2	2	2	2	2	2	2	2	2	2	2	
MEKORYUK	2	2	2	2	2	2	2	2	2	2	2	2	2	
METLAKATLA	46	39.1%	18	55.6%	2,726	110	27.8%	12	500	6	21	3	21	
MEYERS CHUCK	14	71.4%	10	70.0%	1,680	36	0.0%	0	0	0	0	13	13	
NAKNEK	5	5	5	5	5	5	5	5	5	5	5	5	5	
NANNWALEK	7	42.9%	3	100.0%	3,190	203	0.0%	0	0	0	0	50	50	
NEWTOK	1	1	1	1	1	1	1	1	1	1	1	1	1	
NIGHTMUTE	24	45.8%	11	63.6%	2,600	193	0.0%	0	0	0	0	0	0	
NIKOLSKI	7	71.4%	2	40.0%	2,101	32	40.0%	25	900	0	0	0	0	
NOME	11	36.4%	4	75.0%	0	0	25.0%	0	0	0	0	0	0	
OLD HARBOR	35	68.6%	14	58.3%	3,758	104	45.8%	35	1,185	0	0	0	0	
OUZINKIE	16	62.5%	10	70.0%	1,580	42	20.0%	8	380	2	30	0	0	
PELICAN	48	68.8%	33	57.8%	5,245	133	42.4%	95	2,967	29	137	7	28	
PERRYVILLE	1	1	1	1	1	1	1	1	1	1	1	1	1	
PETERSBURG	1,065	69.8%	743	69.8%	56,836	2,311	27.2%	847	20,701	19	361	52	361	
PLATINUM	1	1	1	1	1	1	1	1	1	1	1	1	1	
PORT ALEXANDER	26	65.4%	17	64.7%	2,720	92	35.3%	4	105	3	49	6	49	
PORT GRAHAM	16	43.8%	7	57.1%	1,827	103	0.0%	0	0	0	2	2	2	
PORT HEIDEN	1	1	1	1	1	1	1	1	1	1	1	1	1	
PORT LIONS	32	65.6%	13	61.9%	4,048	161	66.7%	99	2,475	0	0	0	0	
PORT PROTECTION	19	68.4%	10	76.9%	1,552	44	38.5%	4	227	1	21	5	21	
PT BAKER	18	77.8%	14	76.6%	1,592	45	21.4%	0	0	0	0	0	26	
QUINHAGAK	4	4	4	4	4	4	4	4	4	4	4	4	4	
SAND POINT	18	61.1%	11	45.5%	2,025	83	36.4%	47	919	1	28	2	28	
SAVONGA	2	2	2	2	2	2	2	2	2	2	2	2	2	
SAYMAN	36	61.1%	22	61.1%	840	68	9.1%	33	550	0	0	0	0	

Appendix Table 1. [continued]

Place of Residence ¹	Return Rate		Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
	SHARCS Surveys Number	Returned Percent	Number	Percent	Number	Percent	Number	Percent	Number	Pounds ²	Number	Percent	Number	Number
ADAK	13	69.2%	9	11.1%	1	11.1%	8	35.5%	0	0	0	0.0%	0	1
AKHIOK	22	31.8%	7	31.8%	6	85.7%	52	1.0%	0	0	0	0.0%	0	0
AKUTAN	49	26.5%	13	26.5%	12	92.3%	139	38.5%	5	5	170	0.0%	6	5
ALEKNAGIK	4		4		0		0		0	0	0	0.0%	0	0
ANCHOR POINT	11	36.4%	4	36.4%	0	0.0%	0	50.0%	0	0	0	0.0%	0	0
ANGORAGE	221	48.0%	106	48.0%	21	19.8%	582	22.6%	24	3,157	1,111	13.9%	10	8
ANGSON	172	41.9%	37	41.9%	13,076	51.4%	483	13.076	47	1,145	10	10	10	96
AITKA	12	33.3%	4	33.3%	1	25.0%	4	0.0%	0	0	0	0.0%	2	2
AJUKA BAY	2		5	62.5%	3	60.0%	21	59.0	0	0	0	0.0%	0	0
BETHEL	2		8		3	60.0%	21	59.0	0	0	0	0.0%	0	0
BIG LAKE	2		15	75.0%	11	73.3%	221	2.986	0	0	0	0.0%	0	0
CHEFORNAK	20	75.0%	15	75.0%	11	73.3%	221	2.986	0	0	0	0.0%	22	6
CHEMGA BAY	18	55.6%	10	55.6%	7	70.0%	6,547	40.0%	4	4	1,171	40.0%	27	6
CHEVAK	13	76.9%	10	76.9%	8	80.0%	18	495	0	0	0	0.0%	0	0
CHIGNIK	31	71.0%	22	71.0%	13	59.1%	127	22.7%	5	5	1,280	22.7%	4	43
CHIGNIK LAGOON	42	61.9%	26	61.9%	19	73.1%	138	3,854	3	3	1,100	11.5%	1	6
CHIGNIK LAKE	8	87.5%	7	87.5%	4	57.1%	23	475	3	20	187	42.9%	0	0
CHINIAK	21	52.4%	11	52.4%	9	81.8%	178	6,072	4	26	875	36.4%	2	22
CHUGIAK	7	85.7%	6	85.7%	1	16.7%	45	700	1	4	150	16.7%	0	0
CLARKS POINT	4		39	84.8%	22	56.4%	239	5,805	14	54	1,220	35.9%	5	54
COFFMAN COVE	46	84.8%	39	84.8%	22	56.4%	239	5,805	14	54	1,220	35.9%	1	54
COLD BAY	24	58.3%	14	58.3%	8	57.1%	135	2,265	7	49	1,285	50.0%	1	4
COPPER CENTER	2		418	69.4%	199	47.6%	1,797	42,226	129	396	9,596	30.9%	23	331
CORDOVA	602	69.4%	418	69.4%	199	47.6%	1,797	42,226	129	396	9,596	30.9%	23	331
CRAIG	499	65.3%	326	65.3%	159	48.8%	1,083	42,212	118	615	11,351	36.2%	36	828
DELTA JUNCTION	3		48	77.4%	9	18.8%	40	1,337	2	0	0	4.2%	1	2
DILLINGHAM	62	77.4%	48	77.4%	9	18.8%	40	1,337	2	0	0	4.2%	1	2
DOUGLAS	17	41.2%	7	41.2%	1	14.3%	17	315	1	3	50	14.3%	1	2
DUCH HARBOR	61	72.1%	44	72.1%	20	45.5%	240	8,183	13	63	1,738	29.5%	8	161
EAGLE RIVER	12	50.0%	6	50.0%	0	0.0%	0	0	3	23	585	50.0%	0	0

Rural Community ¹															
Return Rate		Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingcod Bycatch		Rockfish Bycatch		Rural Community Subtotals	
SHARCS Surveys Number	Returned Percent	Number	Percent	Number	Percent	Number	Percent	Number	Pounds ²	Number	Percent	Number	Number	Number	Number
115	74.8%	86	55.8%	935	18,143	33	38.4%	276	5,890	6	15	15	89	7,869	5,445
5		1,578	68.8%	484	44.6%	3,618	115,926	264	1,647	178	490	242	1,952	14,306	8,565
58	74.1%	43	44.2%	76	2,501	13	30.2%	29	619	1	2	1	2	3,690	2,620
3	25.0%	2	50.0%	2	110	0	0.0%	0	0	0	0	0	0	24,233	2,820
8	25.0%	2	50.0%	2	110	0	0.0%	0	0	0	0	0	0	660,711	307.8%
5	83.3%	10	70.0%	68	3,455	3	30.0%	9	275	4	49	5	49	24,233	307.8%
2	84.1%	37	84.1%	24	64.9%	119	4,500	15	901	2	2	10	91	24,233	307.8%
44	84.1%	37	84.1%	24	64.9%	119	4,500	15	901	2	2	10	91	24,233	307.8%
134	82.1%	110	82.1%	56	50.9%	299	11,975	40	98	2,729	8	23	240	24,233	307.8%
3		3		449	56.3%	13,326	26.3%	79	2,382	4	6	10	174	24,233	307.8%
116	69.0%	80	69.0%	45	56.3%	13,326	26.3%	79	2,382	4	6	10	174	24,233	307.8%
27	88.9%	24	88.9%	13	54.2%	1,705	54.2%	38	1,410	0	4	34	34	24,233	307.8%
424	71.2%	302	71.2%	143	47.4%	29,426	23.5%	153	4,277	5	20	30	177	24,233	307.8%
63	65.1%	41	65.1%	24	58.5%	13,525	19.5%	39	1,555	14	84	10	86	24,233	307.8%

TRIBAL/RURAL GRAND TOTALS															
SHARCS Surveys Number	Returned Percent	Number	Percent	Number	Percent	Number	Percent	Number	Pounds ²	Number	Percent	Number	Number	Number	Number
14,306	59.9%	8,565	59.9%	3,690	43.1%	36,292	1,011,346	2,063	9,418	261,040	572	2,136	11,226	14,306	11,226

Rural Community Subtotals															
SHARCS Surveys Number	Returned Percent	Number	Percent	Number	Percent	Number	Percent	Number	Pounds ²	Number	Percent	Number	Number	Number	Number
7,869	428.0%	5,445	428.0%	2,820	307.8%	660,711	1,655	126.3%	7,997	217,342	432	1,300	774	7,869	7,332

Appendix Table 1. [continued]

Place of Residence	Return Rate		Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
	Number	Percent	Number	Percent	Number	Pounds	Number	Percent	Number	Pounds	Number	Percent	Number	Percent
EDNA BAY	24	75.0%	12	66.7%	66	3,459	6	33.3%	8	325	2	2	7	80
EELK	21	52.4%	5	45.5%	43	1,800	0	0.0%	0	0	0	0	0	0
ELFIN COVE	20	70.0%	4	28.6%	35	635	1	7.1%	2	160	0	0	1	0
EXCURSION INLET	2													
FAIRBANKS	9	88.9%	8	88.9%	10	400	2	28.0%	3	200	0	0	1	0
FALSE PASS	10	40.0%	4	40.0%	3	1,400	0	0.0%	0	0	1	89	0	0
FRITZ CREEK	2													
GAMBELL	7	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0
GLENNATALLEN	4													
GOLovin	1													
GOODNEWS BAY	17	58.8%	10	58.8%	108	2,319	1	10.0%	0	0	1	4	0	0
GUSTAVUS	77	74.0%	57	49.1%	274	7,035	22	38.6%	106	3,327	8	15	24	106
HAINES	556	47.3%	203	47.3%	1,042	30,857	84	19.6%	106	3,327	8	15	24	106
HOLLIS	5													
HOMER	28	60.7%	17	52.9%	50	850	3	17.6%	15	224	4	11	0	0
HOONAH	334	52.4%	175	38.9%	687	18,202	37	21.1%	193	4,665	5	15	13	145
HOOPER BAY	93	66.7%	22	35.5%	151	3,085	1	1.6%	50	1,650	1	1	10	10
HYPABURG	186	93.5%	174	93.5%	30,417	554	17	9.8%	40	2,220	16	41	617	617
HYDER	39	76.9%	30	53.3%	88	2,452	4	13.3%	13	450	5	8	31	31
JUNEAU	419	43.2%	181	26.5%	485	14,912	30	16.8%	154	5,380	5	11	200	200
KAKE	163	54.6%	89	39.3%	471	15,344	13	14.6%	40	1,827	5	9	93	93
KALSKAIG	1													
KARLUK	1													
KASAMN	12	63.2%	8	66.7%	84	3,005	5	41.7%	6	215	2	4	53	53
KASLOF	7	14.3%	1	100.0%	17	315	0	0.0%	0	0	0	0	0	0
KENAI	57	71.9%	8	19.5%	99	2,570	16	39.0%	71	1,336	3	12	5	5
KEICHIKAN	882	44.2%	390	28.5%	852	24,223	78	20.0%	250	6,933	15	39	696	696
KING COVE	61	59.0%	36	59.0%	231	8,062	6	16.7%	25	918	3	57	185	185
KING SALMON	4													
KIPNUK	87	47.1%	41	43.9%	178	2,841	2	4.9%	0	0	0	0	0	0
KLAWOCK	320	57.2%	183	39.3%	698	18,769	38	20.8%	194	4,913	20	33	423	423
KODIAK	1,741	1,110	585	52.7%	7,966	191,473	447	40.3%	2,613	73,393	67	123	1,455	1,455
KONGIGANUK	13	42.9%	7	42.9%	23	510	0	0.0%	0	0	0	0	0	0
KWIGILLINGOK	45	40.0%	4	22.2%	31	785	0	0.0%	0	0	0	0	0	0
LARSEN BAY	39	82.1%	32	82.1%	211	4,738	11	34.4%	65	2,320	4	8	104	104
LOWER KALSKAG	2													
MAANOKOTAK	2													
MARSHALL	1													
MCGRAITH	4													
MEKORVUK	15	100.0%	15	100.0%	216	2,618	1	6.7%	0	0	1	13	0	0
METILAKATLA	414	34.3%	142	29.6%	291	7,364	21	14.8%	23	975	10	13	126	126
METERS CHUCK	14	71.4%	10	70.0%	8	1,880	0	0.0%	0	0	1	3	13	13
MANKE	10	60.0%	6	66.7%	8	478	1	16.7%	0	0	1	0	0	0
MANVALEK	37	32.4%	12	32.4%	373	5,600	2	16.7%	45	350	3	9	230	230
NAPAKAK	3													
NAUKATI	11	81.8%	9	81.8%	72	1,517	6	66.7%	35	820	0	3	91	91
NELSON LAGOON	1													
NEWTOK	5													
NIGHTMUTE	31	48.4%	15	48.4%	222	2,869	0	0.0%	0	0	0	0	0	0
NIKISKI	7	28.6%	2	28.6%	4	130	1	50.0%	4	138	1	1	0	0
NIKOLSKI	18	27.8%	5	27.8%	36	2,281	1	20.0%	5	700	0	0	0	0
NINILCHIK	62	50.0%	10	32.3%	151	4,449	4	12.9%	31	820	1	2	207	207
NORTH POLE	4													
NUNAPITCHUK	1													
OLD HARBOR	74	55.4%	41	55.4%	170	5,791	17	41.5%	56	1,670	0	0	105	105
OUZINKIE	43	58.1%	25	58.1%	133	5,096	6	24.0%	24	1,165	4	5	0	0
PALMER	4													
PELLICAN	57	68.4%	39	68.4%	22	56.4%	13	33.3%	93	2,887	11	34	184	184

Appendix Table 1. [continued]

Appendix Table 1. (continued)

Place of Residence ¹	Return Rate		Subsistence Fished		Subsistence Harvest		Sport Fished		Sport Harvest		Lingood Bycatch		Rockfish Bycatch		
	SHARCs Issued ²	Surveys Returned	Percent Returned	Number Respondents	Percent Respondents	Number Halibut	Pounds Halibut ³	Number Respondents	Percent Respondents	Number Halibut	Pounds Halibut ³	Number Respondents	Number Lingood	Number Respondents	Number Rockfish
PERRYVILLE	38	25	65.8%	16	64.0%	118	3,059	3	12.0%	2	100	1	1	3	16
PETERSBURG	1,197	816	68.2%	318	39.0%	2,430	59,670	218	26.7%	879	21,521	20	52	54	366
PLATINUM	1	20	71.4%	15	75.0%	66	2,272	4	20.0%	2	30	1	1	7	43
POINT BAKER	28	17	60.8%	11	64.7%	93	2,700	4	23.5%	3	70	3	5	4	24
PORT ALEXANDER	25	16	30.8%	7	43.8%	194	2,917	3	18.8%	17	205	0	0	1	2
PORT GRAHAM	52	1	1.9%	1	1.9%	310	7,506	31	57.4%	168	5,512	1	4	1	5
PORT HEIDEN	1														
PORT LIONS	84	54	64.3%	25	46.3%										
PORT PROTECTION	1														
PORT WILLIAM	1														
QUINHAGAK	16	10	62.5%	7	70.0%	58	3,070	0	0.0%	0	0	0	0	0	0
SAND POINT	321	121	37.7%	38	31.4%	556	11,876	10	8.3%	54	1,045	3	11	7	117
SAVOONGA	44	11	25.0%	4	36.4%	26	2,000	0	0.0%	0	0	0	0	1	4
SAXMAN	15	12	80.0%	7	58.3%	125	17,830	1	8.3%	1	80	0	0	1	9
SCAMMON BAY	7	4	57.1%	2	50.0%	17	215	0	0.0%	0	0	0	0	0	0
SELDOVIA	123	91	74.0%	53	58.2%	1,045	20,753	36	39.6%	292	6,210	7	16	17	103
SEWARD	10	2	20.0%	1	50.0%	10	350	1	50.0%	5	250	0	0	0	0
SHISHMARF	1														
SITKA	1,974	1,339	67.8%	578	43.2%	4,339	140,030	295	22.0%	1,746	54,030	195	591	274	2,270
SKAGWAY	62	47	75.8%	21	44.7%	106	3,041	14	29.8%	31	665	1	1	1	2
SOLDOTNA	18	12	66.7%	2	16.7%	4	300	7	58.3%	25	890	0	0	0	0
SOUTHNAKNEK	3														
ST GEORGE ISLAND	32	7	21.9%	3	42.9%	20	590	0	0.0%	0	0	0	0	0	0
ST PAUL ISLAND	218	169	77.5%	18	10.7%	288	8,085	1	0.8%	4	350	2	9	3	134
STERLING	4														
TATILEK	30	18	60.0%	10	55.6%	151	6,110	1	5.6%	2	90	3	3	7	95
TELLER	2														
TENAKEE SPRINGS	44	37	84.1%	24	64.9%	119	4,500	15	40.5%	36	901	2	2	10	91
THORNE BAY	134	109	81.3%	56	51.4%	300	12,140	40	36.7%	98	2,725	8	10	23	240
TOGAK	10	6	60.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0
TOKSOOK BAY	522	148	28.4%	61	41.2%	1,140	19,752	2	1.4%	5	130	2	8	1	6
TRAPPER CREEK	2														
TUNUNAK	70	33	47.1%	20	60.6%	298	3,536	0	0.0%	0	0	0	0	0	0
TWIN HILLS	1														
UNALAKLEET	1														
UNALASKA	89	53	59.6%	35	66.0%	305	8,048	8	15.1%	16	644	4	14	6	47
VALDEZ	26	16	61.5%	10	62.5%	41	1,715	4	25.0%	9	255	3	5	6	42
WARD COVE	46	29	63.0%	5	17.2%	22	740	6	20.7%	8	365	3	9	2	37
WASILLA	28	14	50.0%	2	14.3%	2	100	3	21.4%	12	460	0	0	0	0
WHALE PASS	6	2	33.3%	0	0.0%	0	0	0	0.0%	0	0	0	0	0	0
WHITE MOUNTAIN	1														
WHITTIER	2														
WILLOW	1														
WRANGELL	530	373	70.4%	171	45.8%	1,228	36,691	91	24.4%	196	5,473	8	30	33	211
YAKUTAT	118	74	62.7%	42	56.8%	598	24,320	11	14.9%	53	2,175	23	173	15	150
Alaska Totals	14,076	8,473	78	3,690	53	36,292	1,011,348	2,062	22	9,417	261,020	572	2,136	1,025	11,226
Non-Alaska Totals ⁴	230	92	68	0	0	0	0	1	1	1	20	0	0	0	0
PLACE OF RESIDENCE GRAND TOTALS	14,306	8,565	95.9%	3,690	43.1%	36,292	1,011,348	2,063	24.1%	9,418	261,040	572	2,136	1,025	11,226

¹ To protect confidentiality, data for tribes and communities with 5 or fewer SHARCs issued are not reported in this table. Tribal and community subtotals included all tribes and communities.
² SHARC = subsistence halibut registration certificate.
³ Pounds round weight, as reported by respondents; converted to pounds net weight in other tables. Net weight=75% of round weight.
⁴ Note that members of eligible Alaska tribes could obtain SHARCs regardless of their place of residence. All non-Alaska resident SHARC holders were members of eligible tribes.

Appendix Table 2. Reported Harvests of Halibut in Number of Fish by Return Category, Eligible Alaska Tribe, Eligible Alaska Rural Community, and Community of Residence, 2005

Tribal Name ¹	First Mailing Response				Second Mailing Response				Third Mailing Response				Staff Administered			
	Number Returned	Subsistence Fished	Halibut Returned	Mean All Those Fished	Number Returned	Subsistence Fished	Halibut Returned	Mean All Those Fished	Number Returned	Subsistence Fished	Halibut Returned	Mean All Those Fished	Number Returned	Subsistence Fished	Halibut Returned	Mean All Those Fished
AGDAGAUX TRIBE OF KING COVE	15	8	88	59	11	4	31	28	15	5	87	109	17	0	0	0.0
ANGONX COMMUNITY ASSOCIATION	26	14	226	87	11	4	31	28	15	5	87	109	17	0	0	0.0
MANGVAN TRADITIONAL COUNCIL	190	58	662	35	47	11	88	19	8	41	228	56	25	5	25	5.0
CENTRAL COUNCIL, LINGIT AND HAIDA INDIAN TRIBE	0	0	0	0	1	1	4	4.0	0	0	0	0	0	4	4	1.0
CHIGNIK LAKE VILLAGE	4	2	10	25	2	2	14	7.0	0	0	0	0	0	0	0	0.0
CHILKAT INDIAN VILLAGE	14	5	22	16	7	7	7.0	4.4	1	1	0	0	0	0	0	0.0
CHILKOOT INDIAN ASSOCIATION	24	6	22	09	4	2	24	6.0	2	2	24	12	24	0	0	0.0
CRAGI COMMUNITY ASSOCIATION	26	12	79	37	4	4	5	13	2	2	16	8.0	16	0	0	0.0
DOUGLAS INDIAN ASSOCIATION	6	1	62	103	4	1	2	05	3	3	0	0	0	0	0	0.0
ECEGIK VILLAGE	6	6	25	42	0	0	0	0	0	0	0	0	0	0	0	0.0
HODONAH INDIAN ASSOCIATION	53	21	200	38	19	7	55	29	15	15	34	23	17	0	0	0.0
HYDABURG COOPERATIVE ASSOCIATION	41	18	63	15	4	0	0	0	2	2	64	43	32	0	0	10.7
HYANOFF BAY VILLAGE	2	1	2	10	0	0	0	0	0	0	0	0	0	0	0	0.0
KENAIITZE INDIAN TRIBE	29	5	118	41	10	3	35	67	6	1	40	67	40	0	0	0.0
KETCHIKAN INDIAN CORPORATION	190	47	399	21	56	13	92	16	21	31	7	20	29	36	4	4.0
KING ISLAND NATIVE COMMUNITY	44	14	101	23	17	4	62	36	15	22	102	46	14	0	0	0.0
KLAWOCK COOPERATIVE ASSOCIATION	61	4	5	01	15	1	2	01	14	4	31	22	7	1	0	0.0
LEVELOK VILLAGE	0	0	0	0	28	5	61	22	21	8	38	18	46	0	0	0.0
NETLAKA TLA INDIAN COMMUNITY	82	22	111	14	50	28	61	22	8	8	38	18	46	0	0	0.0
NATIVE VILLAGE OF ATRKA	2	2	35	35	1	1	10	10	0	0	0	0	0	0	0	0.0
MANNEK NATIVE VILLAGE	2	2	7	7	1	1	10	10	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF AFOGMAK	12	8	136	113	4	1	3	08	2	2	3	15	30	0	0	0.0
NATIVE VILLAGE OF AKHIOK	2	2	18	90	4	4	21	53	3	3	18	60	18	0	0	0.0
NATIVE VILLAGE OF AKUTAN	6	6	95	158	2	2	6	30	1	1	18	18	18	0	0	0.0
NATIVE VILLAGE OF ALKKNAGIK	0	0	0	0	28	5	61	22	21	8	38	18	46	0	0	0.0
NATIVE VILLAGE OF BELKOFSKI	4	3	56	140	2	2	31	155	5	3	11	22	37	0	0	0.0
NATIVE VILLAGE OF CHENGA	7	1	6	09	3	3	29	97	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF CHIGNIK	19	13	101	53	2	1	3	15	5	3	25	50	83	0	0	0.0
NATIVE VILLAGE OF CHIGNIK LAGOON	11	3	22	20	5	0	0	0	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF DILLINGHAM (CURYUNG)	11	3	32	22	7	3	17	00	1	1	0	0	0	0	0	0.0
NATIVE VILLAGE OF EERK	5	3	32	64	3	3	5	00	0	0	0	0	0	2	2	8.0
NATIVE VILLAGE OF EKUK	26	14	118	45	8	4	18	23	4	4	45	50	113	0	0	0.0
NATIVE VILLAGE OF EYAK	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF FALSE PASS	2	2	5	25	2	2	20	100	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF GAMBELL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF GOODNEWS BAY (MUMTRAQ)	8	4	93	116	0	0	0	0	1	1	0	0	0	0	0	0.0
NATIVE VILLAGE OF HOOPER BAY	12	4	76	63	12	6	19	16	5	1	9	18	90	0	0	4.3
NATIVE VILLAGE OF KARLUK	7	4	25	36	3	1	10	10	1	1	6	60	60	29	11	11.2
NATIVE VILLAGE OF KAPLUK	7	4	25	36	3	1	10	10	1	1	6	60	60	29	11	11.2
NATIVE VILLAGE OF KONGIGANAK	2	2	19	95	2	2	0	0	0	0	0	0	0	1	4	4.0
NATIVE VILLAGE OF KWINGLINGOK	2	2	12	60	1	1	0	0	0	0	0	0	0	15	15	9.5
NATIVE VILLAGE OF KWINHAGAK	3	3	13	43	1	1	0	0	0	0	0	0	0	2	2	5.0
NATIVE VILLAGE OF LARSEN BAY	16	14	190	119	7	7	0	0	8	8	19	24	63	0	0	0.0
NATIVE VILLAGE OF MEKORYUK	7	4	131	187	0	0	0	0	1	1	20	20	20	7	7	19.7
NATIVE VILLAGE OF NANWALEK	9	8	170	189	0	0	0	0	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF NAPAKIAK	0	0	0	0	1	1	15	150	0	0	0	0	0	3	3	7.0
NATIVE VILLAGE OF NIGHTMUTE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0
NATIVE VILLAGE OF NIKOLSKI	0	0	0	0	0	0	0	0	1	1	4	40	40	0	0	0.0
NATIVE VILLAGE OF OUZNIKIE	15	10	79	53	2	2	17	85	1	1	5	50	50	0	0	0.0
NATIVE VILLAGE OF PERVILLE	21	13	85	40	2	2	40	133	0	0	3	30	30	0	0	0.0
NATIVE VILLAGE OF PORT GRAHAM	8	4	207	259	4	4	86	215	1	1	3	30	30	0	0	0.0
NATIVE VILLAGE OF PORT HEIDEN	20	7	35	18	11	4	108	98	4	4	27	27	27	0	0	0.0
NATIVE VILLAGE OF SAVOONGA	8	3	23	29	2	1	3	15	1	1	30	30	30	0	0	0.0

(continued)

Appendix Table 2. [continued]

Tribal Name	First Mailing Response				Second Mailing Response				Third Mailing Response				Staff Administered							
	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished
NATIVE VILLAGE OF SCAMMON BAY	15	7	90	6.0	12.9	2	2	5	2.5	2.5	1	1	17	17.0	17.0	0	0	0	0.0	0.0
NATIVE VILLAGE OF SHAKTOOLIK	33	9	126	3.8	14.0	7	0	0	0.0	0.0	12	2	32	27	16.0	49	917	9.6	19.9	
NATIVE VILLAGE OF SHISHMAREF	4	2	24	6.0	12.0	1	1	5	5.0	5.0	1	0	0	0.0	0.0	18	274	9.8	15.2	
NATIVE VILLAGE OF TOKSOOK BAY (NUNAKAUYAK)	4	2	5	1.3	2.5	1	0	0	0.0	0.0	0	0	0	0.0	0.0	0	0	0.0	0.0	
NATIVE VILLAGE OF TUNUNAK																				
NATIVE VILLAGE OF UNALAKLEET																				
NATIVE VILLAGE OF UNGA																				
NATIVE VILLAGE OF WHITE MOUNTAIN																				
NEWTOK VILLAGE	33	10	216	6.5	21.6	10	2	16	8.0	8.0	2	1	6	3.0	6.0	0	0	0.0	0.0	
NINILCHIK VILLAGE	2	0	0	0.0	0.0	1	0	0	0.0	0.0	1	0	0	0.0	0.0	0	0	0.0	0.0	
NOME ESKIMO COMMUNITY	32	9	160	5.0	17.8	15	3	25	8.3	8.3	9	3	62	69	20.7	0	0	0.0	0.0	
ORGANIZED VILLAGE OF KAKE	1	0	0	0.0	0.0	2	2	37	18.5	18.5	1	2	2	2.0	2.0	0	0	0.0	0.0	
ORGANIZED VILLAGE OF KASAAK	13	3	42	3.2	14.0	8	3	8	1.0	2.7	2	0	0	0.0	0.0	8	108	10.8	13.4	
ORGANIZED VILLAGE OF SAXMAN	4	1	5	1.3	5.0	0	0	0	0.0	0.0	0	0	0	0.0	0.0	0	0	0.0	0.0	
ORUTSARAJUT NATIVE VILLAGE	11	3	84	7.6	28.0	7	2	38	5.4	19.0	0	0	0	0.0	0.0	0	0	0.0	0.0	
PAULOFF HARBOR VILLAGE	49	15	63	1.3	4.2	11	3	12	1.1	4.0	8	2	51	6.4	25.5	0	0	0.0	0.0	
PETERSBURG INDIAN ASSOCIATION																				
PLATINUM TRADITIONAL VILLAGE	5	2	18	3.6	9.0	0	0	0	0.0	0.0	0	0	0	0.0	0.0	0	0	0.0	0.0	
PRIEBLOF ISLANDS ALEUT COMMUNITY OF ST GEORGE	21	3	26	1.2	8.7	18	9	180	10.0	20.0	6	4	55	9.2	13.8	130	0	0.0	0.0	
PRIEBLOF ISLANDS ALEUT COMMUNITY OF ST PAUL	55	21	342	6.2	16.3	24	4	19	0.8	4.8	11	2	10	0.3	5.0	0	0	0.0	0.0	
QAGAN TOYAGUNGIN TRIBE OF SAND POINT VILLAGE	7	5	38	5.4	7.6	3	1	9	3.0	9.0	1	0	0	0.0	0.0	0	0	0.0	0.0	
DAWALINGIN TRIBE OF UNALASKA	20	12	135	6.8	11.3	2	1	70	35.0	70.0	7	0	0	0.0	0.0	0	0	0.0	0.0	
SELDOVIA VILLAGE TRIBE	65	38	529	8.1	13.9	14	10	152	10.9	15.2	16	4	17	1.1	4.3	0	0	0.0	0.0	
SHOONAQ TRIBE OF KODIAK	134	50	271	2.0	5.4	24	13	133	5.5	10.2	42	12	150	3.6	12.5	62	115	1.9	8.8	
SITKA TRIBE OF ALASKA																				
SKAGWAY VILLAGE																				
SOUTH NANNEK VILLAGE	2	0	0	0.0	0.0	1	0	0	0.0	0.0	1	0	0	0.0	0.0	0	0	0.0	0.0	
TRADITIONAL VILLAGE OF TOGIAK																				
UGASHIK VILLAGE	1	1	50	50.0	50.0	2	2	35	17.5	17.5	2	2	92	46.0	46.0	9	6	44	4.9	7.5
VILLAGE OF CLARK'S POINT																				
VILLAGE OF KANATAK	1	0	0	0.0	0.0	0	0	0	0.0	0.0	0	0	0	0.0	0.0	0	0	0.0	0.0	
VILLAGE OF OLD HARBOR	11	7	28	2.5	4.0	6	4	24	4.0	6.0	1	1	6	6.0	6.0	0	0	0.0	0.0	
VILLAGE OF SALAMATOFF	9	1	4	0.4	4.0	0	0	0	0.0	0.0	1	1	12	12.0	12.0	0	0	0.0	0.0	
WRANGELL COOPERATIVE ASSOCIATION	49	19	177	3.6	9.3	13	4	68	5.2	17.0	5	1	2	0.4	2.0	0	0	0.0	0.0	
YAKUTAT TLINGIT TRIBE	23	13	195	8.5	15.0	6	3	58	9.7	19.3	1	1	6	0.0	6.0	0	0	0.0	0.0	
Tribal Name Subtotals	1,671	622	6,626	4.0	10.7	489	164	1,800	3.6	11.0	371	111	1,402	3.8	12.6	579	171	2,231	3.9	13.0

Rural Community	First Mailing Response				Second Mailing Response				Third Mailing Response				Staff Administered							
	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished	Number Returned	Number Subistence Fished	Number Habut Harvested	Mean, All Those Returned	Mean, Those Who Fished
ADAK	3	2	15	5.0	7.5	0	0	0	0.0	0.0	7	0	0	0.0	0.0	0	0	0	0.0	0.0
AKHIOK																				
AKUTAN																				
ALEKNAGIK	14	7	96	6.9	13.7	4	2	15	3.8	7.5	3	2	9	3.0	4.5	0	0	0	0.0	0.0
ANGOOK	2	0	0	0.0	0.0	2	1	4	2.0	4.0	0	0	0	0.0	0.0	0	0	0	0.0	0.0
ATKA																				
BETHEL																				
CHEFORNAK	6	4	152	25.3	38.0	0	0	0	0.0	0.0	1	0	0	0.0	0.0	0	0	0	0.0	0.0
CHEVAK																				
CHIGNIK	8	5	43	5.4	8.6	0	0	0	0.0	0.0	1	1	10	10.0	10.0	0	0	0	0.0	0.0

[continued]

Rural Community ¹	First Mailing Response				Second Mailing Response				Third Mailing Response				Staff Administered			
	Number Returned	Substance Fished	Number of Habits Returned	Mean, All Those Fished	Number Returned	Substance Fished	Number of Habits Returned	Mean, All Those Fished	Number Returned	Substance Fished	Number of Habits Returned	Mean, All Those Fished	Number Returned	Substance Fished	Number of Habits Returned	Mean, All Those Fished
CHIGNIK LAGOON	4	4	28	7.0	0	0	0	0.0	0	0	0	0.0	0	0	0	0.0
CHIGNIK LAKE																
CHINIAK																
CLARKS POINT	31	18	181	5.8	4	58	11.6	14.5	2	2	0	0.0	0	0	0	0.0
COLD BAY	8	6	125	20.8	1	0	0.0	0.0	1	1	2	2.0	2	2	2	2.0
CORDOVA	310	6	144	4.0	22	67	15.0	15.0	22	11	68	6.2	6	3	31	6.2
CRAIG	198	101	1075	5.4	29	197	15.2	15.2	33	21	6.6	6.6	0	0	2.1	6.6
DILLINGHAM	28	4	15	0.5	0	0	0.0	0.0	1	1	0.1	1.0	0	0	0	1.0
EDNA BAY	28	15	85	3.0	7	28	4.0	9.3	3	5	10	2.0	3	3	2.0	3.3
EEN	0	0	0	0	0	0	0	0.0	0	0	0	0.0	0	0	0	0.0
ELFIN COVE	13	3	29	2.2	1	6	6.0	6.0	0	0	0	0.0	0	0	0	0.0
EMMONAK																
FALSE PASS																
GAMBELL																
GOODNEWS BAY	48	22	211	4.4	3	54	9.0	18.0	3	9	30	3.0	3	3	3.0	3.0
HAINES	319	158	711	2.2	48	27	256	9.5	20	7	28	4.0	4	4	4.0	4.0
HOLLIS	32	22	132	4.1	3	1	0.3	1.0	2	1	12	6.0	1	1	12.0	6.0
HOONAH	73	30	295	4.0	14	83	5.9	13.8	4	1	12	3.0	1	1	12.0	3.0
HOOPER BAY	0	0	0	0.0	0	0	0.0	0.0	0	0	0	0.0	0	0	0	0.0
HYDABURG	11	5	18	1.6	0	0	0.0	0.0	1	1	1.0	1.0	5	5	1.0	1.2
HYDER	12	7	36	3.0	13	27	2.1	4.5	5	5	1.0	1.0	5	5	1.0	1.7
KAKE	25	15	180	7.2	2	25	4.2	12.5	3	3	19	4.8	6	6	4.8	6.3
KASAN	12	7	52	4.3	0	0	0.0	0.0	0	0	0	0.0	0	0	0	0.0
KETCHIKAN	12	5	108	9.0	1	0	0.0	0.0	3	32	6.4	10.7	0	0	0	10.7
KING COVE																
KING SALMON	12	36	341	4.6	10	6	7.6	12.7	2	10	3.3	5.0	0	0	0	5.0
KIPNUK	74	36	426	4.6	9	6	7.6	12.7	3	3	39	4.87	0	0	0	12.5
KODIAK	780	426	5432	7.0	123	63	705	5.7	93	2	487	5.2	0	0	0	12.5
KONGIGANAK																
KOTLIK																
KOYUK	10	6	85	8.5	1	0	0.0	0.0	1	0	0	0.0	0	0	0	0.0
LARSEN BAY																
MANAKOTAK																
MEKORUYUK	13	6	86	6.6	2	12	6.0	6.0	3	2	12	4.0	6	6	4.0	6.0
METLAKATLA	6	5	22	3.7	4	2	14	3.5	0	0	0	0.0	0	0	0	0.0
MEYERS CHUCK																
NANNEK																
NANWALEK	3	3	203	67.7	0	0	0.0	0.0	0	0	0	0.0	0	0	0	0.0
NEWTOK																
NIGHTAJUTE	1	1	60	60.0	0	0	0.0	0.0	1	0	0	0.0	0	0	0	0.0
NIKOLSKI	4	2	32	16.0	1	0	0.0	0.0	0	0	0	0.0	0	0	0	0.0
NOME	4	3	0	0.0	0	0	0.0	0.0	0	0	0	0.0	0	0	0	0.0
OLD HARBOR	18	9	82	4.6	4	3	18	4.5	2	2	4	2.0	0	0	0	2.0
OUZINKI	7	6	32	4.6	2	1	10	5.0	1	1	4	2.0	0	0	0	2.0
PELICAN	23	13	82	3.6	6	4	46	7.7	4	2	5	1.3	0	0	0	2.5
PERRVILLE																
PETERSBURG	580	250	2028	3.5	99	34	213	2.2	64	13	70	1.1	0	0	0	5.4
PLATINUM																
PORT ALEXANDER	11	8	65	5.9	6	3	27	4.5	0	0	0	0.0	0	0	0	0.0
PORT GRAHAM	3	2	33	11.0	3	2	70	23.3	1	1	0	0.0	0	0	0	0.0
PORT HEIDEN																
PORT LIONS	16	9	96	6.0	2	1	18	9.0	3	3	47	15.7	0	0	0	15.7
PORT PROTECTION	12	9	42	3.5	1	1	2	2.0	0	0	0	0.0	0	0	0	0.0
PT. BAKER	12	9	33	2.8	1	1	10	10.0	1	1	1	1.0	0	0	0	1.0

Appendix Table 2 [continued]

Place of Residence	First Mailing Response		Second Mailing Response		Third Mailing Response		Staff Administered	
	Number Returned	Number of Substances Fished	Number Returned	Number of Substances Fished	Number Returned	Number of Substances Fished	Number Returned	Number of Substances Fished
FRAG	268	137	192	52	128	65	0	0
DELTA JUNCTION	38	8	0	0	8	1	0	0
DILLINGHAM	29	13	0	0	1	0	0	0
DOUGLAS	4	1	0	0	0	0	0	0
DUTCH HARBOR	29	13	46	77	8	5	0	0
EAGLE RIVER	2	0	0	0	4	0	0	0
EDNA BAY	12	7	28	93	6	2	0	0
BEK	4	2	5	13	0	0	0	0
ELFIN COVE	13	3	6	6	0	0	0	0
EXCURSION INLET	13	3	1	1	0	0	0	0
FAIRBANKS	6	1	2	2	0	0	0	0
FALSE PASS	2	1	0	0	0	0	0	0
FRITZ CREEK	0	0	0	0	0	0	0	0
GAMBELL	0	0	0	0	0	0	0	0
GRENNALLEN	0	0	0	0	0	0	0	0
GOODNEWS BAY	9	5	0	0	0	0	0	0
GUSTAVUS	49	22	54	108	3	3	0	0
HAINES	350	170	265	46	22	7	0	0
HOLLIS	16	9	0	0	0	0	0	0
HOMER	121	51	14	42	19	3	0	0
HOONAH	11	4	19	16	5	1	0	0
HOOPER BAY	48	21	12	16	16	3	0	0
HYDABURG	12	7	6	6	5	3	0	0
HYDER	122	36	34	7	24	5	0	0
JUNEAU	56	24	20	5	24	5	0	0
KAKE	122	36	34	7	24	5	0	0
KALSKAG	10	6	2	2	0	0	0	0
KARLUK	10	6	37	185	185	185	0	0
KASAN	0	0	1	17	17	17	0	0
KASLOF	0	0	0	0	0	0	0	0
KENAI	31	4	0	0	0	0	0	0
KETCHIKAN	249	77	63	21	139	22	0	0
KING COVE	24	12	159	80	80	80	0	0
KING SALMON	7	4	3	3	1	1	0	0
KIPNUK	126	53	28	111	121	43	0	0
KLAWOCK	861	472	142	67	733	107	0	0
KODIAK	2	2	0	0	0	0	0	0
KONGIGANAK	2	2	0	0	0	0	0	0
KWIGILLINGOK	2	2	0	0	0	0	0	0
LARSEN BAY	19	13	4	0	0	0	0	0
LOWER KALSKAG	0	0	0	0	0	0	0	0
MANOKOTAK	0	0	0	0	0	0	0	0
MAARSHALL	0	0	0	0	0	0	0	0
MAGRATH	6	5	0	0	0	0	0	0
MEKORYUK	89	26	29	6	53	18	0	0
METLAKATLA	0	0	0	0	0	0	0	0
MEYERS CHUCK	6	5	4	2	14	1	0	0
MAKNEK	4	3	2	1	1	05	0	0
MANWALEK	12	11	0	0	0	0	0	0
NAPAKAK	0	0	0	0	0	0	0	0
NAUKATI	7	5	1	1	1	1	0	0
NELSON LAGOON	0	0	0	0	0	0	0	0
NEWTON	1	1	1	1	1	1	0	0
NIGHTMUTE	1	1	0	0	0	0	0	0
NIKISKI	1	1	0	0	0	0	0	0
NIKOLSKI	3	2	0	0	0	0	0	0
NINILCHIK	24	8	135	56	160	23	0	0

Appendix Table 2. [continued]

Appendix Table 3. Estimated Subsistence Harvests of Halibut by Eligible Alaska Tribe and Eligible Alaska Rural Community, by Gear Type and Regulatory Area in Number of Fish and Pounds Net Weight, 2005

Tribe Name ¹	Regulatory Area	Number of SHARCS ² Issued ³		Set Hook Gear		Hook & Line or Handline		All Gear	
		Estimated Number Respondents	Estimated Halibut Pounds	Estimated Number Respondents	Estimated Halibut Pounds	Estimated Number Respondents	Estimated Halibut Pounds	Estimated Number Respondents	Estimated Halibut Pounds
ANGLON COMMUNITY ASSOCIATION	2C	128	60	16845	817	26	169	66	19479
		2	2						
CENTRAL COUNCIL LINGIT AND HAIDA INDIAN TRIBES	2C	36	142	36931	1593	64	487	173	2081
		2	9	1116	38	0	0	9	38
CHILKOOT INDIAN ASSOCIATION	2C	47	13	1872	92	3	20	13	113
		30.6%	46.7%	2130	1116	33.9%	59.5%	113	2130
CRAIG COMMUNITY ASSOCIATION	2C	55	24	3953	157	12	37	26	108
		129.6%	30.6%	4659	1116	33.9%	59.5%	113	2130
DOUGLAS INDIAN ASSOCIATION	2C	22	3	2082	108	0	0	3	108
		41.5%	1.1%	2082	108	0.0%	1.1%	3	108
HOONAH INDIAN ASSOCIATION	2C	200	427	9017	2254	227	5446	654	14466
		181	62	2254	551	12	52	65	14466
KETCHIKAN INDIAN CORPORATION	2C	770	130	21822	908	52	316	167	1224
		27.5%	12.6%	27679	24809	13.5%	32.0%	603	1224
KILAWOCK COOPERATIVE ASSOCIATION	2C	165	40	8321	1610	16	85	50	1224
		30.8%	38.6%	9931	24809	13.5%	42.0%	603	1224
METLAKATLA INDIAN COMMUNITY	2C	380	84	11776	476	46	142	102	14037
		38.6%	38.6%	14037	24809	13.5%	42.0%	603	1224
ORGANIZED VILLAGE OF KAKE	2C	113	30	11040	464	6	26	30	11382
		54.6%	54.6%	11382	24809	13.5%	60.7%	490	11382
ORGANIZED VILLAGE OF KASPAAN	2C	8	6	1545	56	2	22	6	2108
		137.2%	137.2%	2108	24633	166.0%	166.0%	78	2108
ORGANIZED VILLAGE OF SAKMAN	2C	59	25	12953	186	13	97	25	24633
		51.8%	51.8%	24633	24633	36.6%	36.6%	282	24633
PETERSBURG INDIAN ASSOCIATION	2C	118	125	2599	1415	16	94	35	219
		56.9%	56.9%	4014	28777	54.3%	20.2%	1124	28777
SITKA TRIBE OF ALASKA	2C	436	135	24858	970	32	155	148	1124
		21.4%	21.4%	28777	24858	54.3%	20.2%	1124	28777
SKAGWAY VILLAGE	2C	1	28	6645	295	16	62	35	358
		31.9%	31.9%	8082	8082	34.6%	34.6%	358	8082
WRANGELL COOPERATIVE ASSOCIATION	2C	97	28	6645	295	16	62	35	358
		31.9%	31.9%	8082	8082	34.6%	34.6%	358	8082
KENAITEZ INDIAN TRIBE	3A	66	6	479	45	9	245	13	278
		49.0%	49.0%	4288	1085	50.0%	48.5%	278	4288
LESNOW VILLAGE (WOODY ISLAND)	3A	224	12	511	28	10	25	22	511
		40.9%	40.9%	1085	1085	50.0%	48.5%	278	4288
NATIVE VILLAGE OF AFONGAK	3A	24	9	2070	144	9	45	13	3100
		60.1%	60.1%	3770	3770	63.3%	63.3%	3770	3770
NATIVE VILLAGE OF CHENEGA	3A	27	0	6195	196	10	44	20	8303
		80.3%	80.3%	8303	8303	62.2%	62.2%	241	8303
NATIVE VILLAGE OF EYAK	3A	87	33	4381	237	9	45	34	5113
		24.6%	24.6%	5113	5113	24.4%	24.4%	282	5113
NATIVE VILLAGE OF KARLUK	3A	5	12	2277	160	15	115	22	4780
		23.0%	23.0%	4780	4780	23.0%	23.0%	275	4780
NATIVE VILLAGE OF LARSEN BAY	3A	41	41	2277	160	15	115	22	4780
		66.0%	66.0%	6427	6427	46.7%	46.7%	604	6427
NATIVE VILLAGE OF NANVALEK	3A	32	21	3427	242	25	300	28	604
		66.0%	66.0%	6427	6427	46.7%	46.7%	604	6427
NATIVE VILLAGE OF OUKZIKIE	3A	34	19	4509	132	13	59	25	6185
		35.7%	35.7%	6185	6185	27.8%	27.8%	191	6185
NATIVE VILLAGE OF PORT GRAHAM	3A	42	16	19121	851	13	148	22	20541
		103.4%	103.4%	20541	20541	88.3%	88.3%	20541	20541
NATIVE VILLAGE OF PORT LIONS	3A	56	14	206	3568	3	510	18	4068
		50.8%	50.8%	4068	4068	52.2%	52.2%	229	4068
NATIVE VILLAGE OF TATILEK	3A	32	18	4667	178	5	507	18	5173
		62.2%	62.2%	5173	5173	56.5%	56.5%	199	5173
NATIVE VILLAGE OF TATILCHIK VILLAGE	3A	96	15	7193	129	17	294	28	508
		76.3%	76.3%	12921	12921	79.5%	79.5%	508	12921
SELDOVIA VILLAGE TRIBE	3A	41	6	1803	129	16	161	18	290
		43.8%	43.8%	5588	5588	42.1%	42.1%	290	5588
SHOONAC TRIBE OF KODIAK	3A	155	69	17982	894	36	233	85	1127
		19.8%	19.8%	26011	26011	19.5%	19.5%	1127	26011
VILLAGE OF OLD HARBOR	3A	45	5	767	30	25	115	30	3381
		56.1%	56.1%	5611	5611	44.1%	44.1%	145	5611
VILLAGE OF SALMATOFF	3A	13	3	653	21	0	0	3	653
		87.8%	87.8%	15363	15363	40.2%	40.2%	501	15363
YAKUTAT LINGIT TRIBE	3A	58	25	13239	420	15	2124	33	501
		55.4%	55.4%	15363	15363	40.2%	40.2%	501	15363
AGDAAGUX TRIBE OF KING COVE	3B	39	7	1343	60	17	105	22	4160
		40.2%	40.2%	4160	4160	47.0%	47.0%	165	4160
CHIGNIK LAKE VILLAGE	3B	9	0	0	0	6	36	6	444
		72.8%	72.8%	210	210	0.0%	0.0%	4	444
VANOFF BAY VILLAGE	3B	7	0	0	0	4	7	4	210
		0.0%	0.0%	210	210	0.0%	0.0%	4	210
NATIVE VILLAGE OF BELKOFSKI	3B	1	1	788	29	4	20	4	1412
		86.4%	86.4%	1412	1412	92.6%	92.6%	49	1412
NATIVE VILLAGE OF CHIGNIK LAGOON	3B	14	1	788	29	4	20	4	1412
		86.4%	86.4%	1412	1412	92.6%	92.6%	49	1412
NATIVE VILLAGE OF CHIGNIK LAGOON	3B	39	14	1626	78	21	116	26	3719
		30.2%	30.2%	3719	3719	32.1%	32.1%	194	3719
NATIVE VILLAGE OF NELSON LAGOON	3B	3	3	975	65	3	16	7	81
		200.5%	200.5%	1219	1219	200.5%	200.5%	81	1219
NATIVE VILLAGE OF PERRYVILLE	3B	36	2	3734	153	11	35	23	4431
		35.9%	35.9%	4431	4431	131.7%	131.7%	8	4431
NATIVE VILLAGE OF UNGA	3B	8	8	120	6	2	2	3	163
		121.8%	121.8%	163	163	131.7%	131.7%	8	163
PAULOFF HARBOR VILLAGE	3B	55	12	6161	240	12	68	15	739
		78.5%	78.5%	739	739	73.1%	73.1%	308	739
DAGMAN TOVAGUNGIN TRIBE OF SAND POINT VILLAGE	3B	26	26	7289	661	59	415	79	1076
		56.9%	56.9%	13751	13751	69.1%	69.1%	1751	13751
VILLAGE OF KANATK	3B	8	0	0	0	0	0	0	0
		0.0%	0.0%	0	0	0.0%	0.0%	0	0
NATIVE VILLAGE OF AKUTAN	3B Totals	494	83	22035	1289	137	819	187	36849
		22.6%	22.6%	36849	36849	28.4%	28.4%	2112	36849
NATIVE VILLAGE OF NIKOISI	4A	44	10	1131	98	39	484	44	14542
		63.5%	63.5%	14542	14542	76.3%	76.3%	582	14542
NATIVE VILLAGE OF NIKOISI	4A	12	0	0	0	12	48	12	1620
		0.0%	0.0%	1620	1620	0.0%	0.0%	48	1620
DAWLINGIN TRIBE OF UNALASKA	4A Totals	37	11	1222	87	14	45	17	762
		52.4%	52.4%	18318	18318	54.9%	54.9%	762	18318
NATIVE VILLAGE OF ALIKA	4B	5	5	2658	185	65	677	73	18318
		71.3%	71.3%	18318	18318	68.5%	68.5%	762	18318
3A Totals	3A Totals	1082	302	92832	4119	291	2174	453	136974
		13.1%	13.1%	136974	136974	11.8%	11.8%	6287	136974
3B Totals	3B Totals	494	83	22035	1289	137	819	187	36849
		22.6%	22.6%	36849	36849	28.4%	28.4%	2112	36849
4A Totals	4A Totals	37	11	1222	87	14	45	17	762
		52.4%	52.4%	18318	18318	54.9%	54.9%	762	18318
4B Totals	4B Totals	5	5	2658	185	65	677	73	18318
		71.3%	71.3%	18318	18318	68.5%	68.5%	762	18318

(continued)

Tribal Name ¹	Regulatory Area	Number of SHARCS Issued ²			Set Hook Gear			Hook & Line or Handline			All Gear		
		Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated	Estimated
		Number of Respondents	Number of Halibut	Pounds Harvested	Number of Respondents	Number of Halibut	Pounds Harvested	Number of Respondents	Number of Halibut	Pounds Harvested	Number of Respondents	Number of Halibut	Pounds Harvested
PRIORIS OF ISLANDS ALEUT COMMUNITY OF ST GEORGE	4C	25	5	863	938	60	3503	10	90	1800	1800	152.3%	
PRIORIS OF ISLANDS ALEUT COMMUNITY OF ST PAUL	4C	224	12	3906	3503	141	3503	20	335	7409	25.7%		
4C Totals		249	17	4769	4441	201	4441	30	425	9208	27.6%		
NATIVE VILLAGE OF GAMBELL	4D	6	0	0	0	0	0	0	0	0	0.0%		
NATIVE VILLAGE OF SAVOONGA	4D	42	15	5813	0	0	0	15	99	5813	149.5%		
4D Totals		48	15	5813	0	0	0	15	99	5813	152.6%		
CHEVAK NATIVE VILLAGE (KASHUNAMIUTI)	4E	6	0	0	194	10	194	5	10	194	53.6%		
EGEGIK VILLAGE	4E	6	0	75	259	19	259	6	25	334	0.0%		
KING ISLAND NATIVE COMMUNITY	4E	1	1	0	0	0	0	6	0	0	0.0%		
LEVELOK VILLAGE	4E	1	0	0	0	0	0	6	0	0	0.0%		
NAKNEK NATIVE VILLAGE	4E	6	14	680	38	2	0	16	100.6%	717	123.8%		
NATIVE VILLAGE OF ALEKNAGIK	4E	4	0	0	114	4	114	4	30	789	80.2%		
NATIVE VILLAGE OF DILLINGHAM (CURYUNG)	4E	23	4	676	114	4	114	4	30	789	80.2%		
NATIVE VILLAGE OF EKVUK	4E	3	0	0	0	0	0	11	101	3164	55.3%		
NATIVE VILLAGE OF GOODNEWS BAY (MUMTRAQ)	4E	15	2	446	2015	7	2015	7	155	2461	76.8%		
NATIVE VILLAGE OF HOOPER BAY	4E	88	5	58	3493	213	3493	34	232	3550	45.9%		
NATIVE VILLAGE OF KIPNUK	4E	88	0	0	4358	348	4358	37	72.4%	4358	59.3%		
NATIVE VILLAGE OF KONGIGANAK	4E	10	0	0	638	38	638	5	80.8%	638	94.2%		
NATIVE VILLAGE OF KWIGILLINGOK	4E	46	0	0	1505	79	1505	10	89.4%	1505	80.7%		
NATIVE VILLAGE OF KWINHAGAK	4E	11	0	0	1258	33	1258	7	59.7%	1258	78.9%		
NATIVE VILLAGE OF MEKORVUK	4E	15	4	145	641	7	641	8	0.0%	1882	0.0%		
NATIVE VILLAGE OF NAPAUK	4E	3	2	0	404	58	404	8	95.1%	404	104.5%		
NATIVE VILLAGE OF NIGHTMUTE	4E	8	0	0	0	0	0	8	0	0	0.0%		
NATIVE VILLAGE OF PORT HEIDEN	4E	1	0	0	0	0	0	0	0	0	0.0%		
NATIVE VILLAGE OF SCAMON BAY	4E	5	0	0	0	0	0	22	8.6%	2790	8.4%		
NATIVE VILLAGE OF SHAKTOOLUK	4E	5	3	332	14235	207	2458	22	312	14837	2.1%		
NATIVE VILLAGE OF TOKSOOK BAY (NUAKAUAYAK)	4E	527	5	602	1070	59	1070	60	1139	14837	2.1%		
NATIVE VILLAGE OF TUNUNAK	4E	73	3	44	207	20	207	22	8.6%	2790	8.4%		
NATIVE VILLAGE OF UNALAKLEET	4E	5	0	0	0	0	0	0	0	0	0.0%		
NATIVE VILLAGE OF WHITE MOUNTAIN	4E	2	0	0	0	0	0	0	0	0	0.0%		
NEWTOK VILLAGE	4E	3	0	0	0	0	0	0	0	0	0.0%		
NOME ESKIMO COMMUNITY	4E	15	0	0	0	0	0	0	0	0	0.0%		
ORUTSARARMUIT NATIVE VILLAGE	4E	8	6	168	48	2	48	2	8	216	170.0%		
PLATINUM TRADITIONAL VILLAGE	4E	1	1	0	0	0	0	0	0	0	0.0%		
SOUTH NAKNEK VILLAGE	4E	2	0	0	0	0	0	0	0	0	0.0%		
TRADITIONAL VILLAGE OF TOGIAK	4E	11	0	0	0	0	0	0	0	0	0.0%		
UGASHIK VILLAGE	4E	4	0	0	0	0	0	0	0	0	0.0%		
VILLAGE OF CHEFORNAK	4E	17	1	48	2087	13	223	13	271	2746	42.2%		
VILLAGE OF CLARK'S POINT	4E	3	0	0	0	0	0	0	0	0	0.0%		
4E Totals		1,036	36	411	5025	234	37242	250	3081	42267	9.2%		
Tribal Name Subtotals	All Regulatory Areas	6,437	1336	14042	329290	1062	8458	167502	22500	496792	6.6%		
Rural Community	Regulatory Area	Number of SHARCS Issued ²	Set Hook Gear	Hook & Line or Handline	All Gear								
		Number of Respondents	Number of Halibut	Pounds Harvested	Number of Respondents	Number of Halibut	Pounds Harvested	Number of Respondents	Number of Halibut	Pounds Harvested	Number of Respondents	Number of Halibut	Pounds Harvested
ANGCONN	2C	33	12	3551	884	27	1086	17	184	4235	48.7%		
COFFMAN COVE	2C	45	22	3766	884	27	1086	25	266	4851	15.2%		

Rural Community	Regulatory Area	Number of SHARCS Issued		Respondents Number		Fished		Harvested		Estimated		Confidence Interval for Pounds of Halibut		Estimated		Confidence Interval for Pounds of Halibut		
		Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	
CRAIG	EDNA BAY	352	136	136	2208	52	403	6730	165	1709	14.5%	28818	11.7%	26.4%	11.3%	25657	26.5%	11.3%
		52	131	131	4107	8	24	268	26	155	23.6%	4395	26.4%	26.4%	26.5%	8281	26.5%	26.5%
		76	30	30	6970	3	16	1311	5	400	23.7%	8281	26.5%	26.5%	26.5%	8281	26.5%	26.5%
		20	17	17	330	3	3	635	5	47	69.6%	635	61.0%	61.0%	61.0%	635	61.0%	61.0%
		52	24	24	4107	8	24	268	26	155	23.6%	4395	26.4%	26.4%	26.4%	4395	26.4%	26.4%
		477	221	221	24300	24	65	1357	226	1158	12.2%	25657	11.3%	11.3%	11.3%	25657	11.3%	11.3%
		52	138	138	3736	6	30	304	173	1040	27.5%	4040	25.9%	25.9%	25.9%	4040	25.9%	25.9%
		141	417	417	7808	18	159	2524	54	577	24.1%	10332	21.4%	21.4%	21.4%	10332	21.4%	21.4%
		18	67	67	671	4	8	429	8	27	20.6%	1100	21.5%	21.5%	21.5%	1100	21.5%	21.5%
		38	23	23	2627	6	14	351	23	116	37.3%	2978	34.0%	34.0%	34.0%	2978	34.0%	34.0%
		54	240	240	6567	14	62	1370	28	302	30.2%	7936	34.7%	34.7%	34.7%	7936	34.7%	34.7%
		2	9	9	2030	0	0	0	9	69	57.6%	2030	45.1%	45.1%	45.1%	2030	45.1%	45.1%
		127	280	280	8357	26	297	3327	60	576	20.1%	11684	18.6%	18.6%	18.6%	11684	18.6%	18.6%
		3	43	43	3911	4	52	349	27	224	67.6%	4261	65.5%	65.5%	65.5%	4261	65.5%	65.5%
46	172	172	1254	4	146	146	40	40	42.0%	1400	50.9%	50.9%	50.9%	1400	50.9%	50.9%		
48	185	185	5746	3	34	719	28	219	33.9%	6465	44.8%	44.8%	44.8%	6465	44.8%	44.8%		
1065	2162	2162	40761	159	891	15907	399	3053	9.3%	56668	7.7%	7.7%	7.7%	56668	7.7%	7.7%		
26	138	138	2981	5	12	292	18	150	33.7%	3273	30.4%	30.4%	30.4%	3273	30.4%	30.4%		
19	42	42	1163	7	12	270	12	54	37.9%	1433	39.0%	39.0%	39.0%	1433	39.0%	39.0%		
18	48	48	1288	0	0	0	12	48	12.6%	1266	26.5%	26.5%	26.5%	1266	26.5%	26.5%		
36	105	105	945	2	5	73	8	110	52.7%	1018	61.9%	61.9%	61.9%	1018	61.9%	61.9%		
1,578	3873	3873	98446	142	925	16186	654	4797	6.6%	114632	6.4%	6.4%	6.4%	114632	6.4%	6.4%		
58	94	94	2314	3	5	125	25	99	29.8%	2438	29.4%	29.4%	29.4%	2438	29.4%	29.4%		
44	102	102	3213	4	30	538	27	132	17.2%	3750	16.8%	16.8%	16.8%	3750	16.8%	16.8%		
134	258	258	8298	10	20	2056	67	344	13.8%	10355	14.9%	14.9%	14.9%	10355	14.9%	14.9%		
27	36	36	743	23	23	642	14	59	30.0%	1385	22.1%	22.1%	22.1%	1385	22.1%	22.1%		
424	961	961	23943	58	244	4098	184	1204	11.6%	28041	12.3%	12.3%	12.3%	28041	12.3%	12.3%		
5,048	1911	12705	281945	618	3580	61482	2197	16285	3.7%	353409	3.4%	3.4%	3.4%	353409	3.4%	3.4%		
3A	3A	188	3088	1	8	116	5	195	95.8%	3203	86.4%	86.4%	86.4%	3203	86.4%	86.4%		
3A	3A	2	12	2	12	116	5	195	95.8%	3203	86.4%	86.4%	86.4%	3203	86.4%	86.4%		
3A	3A	542	29361	94	656	11502	245	2361	12.3%	40863	10.6%	10.6%	10.6%	40863	10.6%	10.6%		
3A	3A	1,538	127677	363	3259	57998	777	9536	7.6%	185675	6.7%	6.7%	6.7%	185675	6.7%	6.7%		
3A	3A	4	44	8	65	1315	8	109	39.7%	1851	36.8%	36.8%	36.8%	1851	36.8%	36.8%		
3A	3A	7	2150	4	48	1040	4	271	270.0%	3190	204.7%	204.7%	204.7%	3190	204.7%	204.7%		
3A	3A	35	1304	17	120	2929	20	150	32.8%	4233	29.5%	29.5%	29.5%	4233	29.5%	29.5%		
3A	3A	16	1275	47	632	632	11	1907	44.7%	1907	47.8%	47.8%	47.8%	1907	47.8%	47.8%		
3A	3A	3	579	5	139	1770	7	177	85.0%	2349	101.8%	101.8%	101.8%	2349	101.8%	101.8%		
3A	3A	17	149	10	88	2138	21	237	25.4%	4595	30.0%	30.0%	30.0%	4595	30.0%	30.0%		
3A	3A	26	389	48	791	10915	61	1179	19.9%	17196	18.8%	18.8%	18.8%	17196	18.8%	18.8%		
3A	3A	63	2619	12	12	231	8	75	39.1%	2850	41.9%	41.9%	41.9%	2850	41.9%	41.9%		
3A	3A	28	344	18	194	8089	36	538	26.0%	18459	54.9%	54.9%	54.9%	18459	54.9%	54.9%		
3A	3A	880	188390	582	5409	98988	1204	14947	6.0%	287378	5.7%	5.7%	5.7%	287378	5.7%	5.7%		
3B	3B	11	232	8	58	1140	8	68	37.5%	1372	36.3%	36.3%	36.3%	1372	36.3%	36.3%		
3B	3B	10	1310	2	10	375	8	56	62.7%	1685	88.7%	88.7%	88.7%	1685	88.7%	88.7%		
3B	3B	4	1456	10	102	1204	13	214	74.2%	2660	64.1%	64.1%	64.1%	2660	64.1%	64.1%		
3B	3B	21	112	10	102	1204	13	214	74.2%	2660	64.1%	64.1%	64.1%	2660	64.1%	64.1%		
3B	3B	5	52	8	124	3348	10	175	43.1%	4554	54.7%	54.7%	54.7%	4554	54.7%	54.7%		
3B	3B	1	16	6	105	1958	7	121	83.2%	2209	84.4%	84.4%	84.4%	2209	84.4%	84.4%		
3B	3B	28	241	35	477	8088	50	718	26.8%	13707	31.1%	31.1%	31.1%	13707	31.1%	31.1%		
4A	4A	0	0	3	48	2364	3	48	137.1%	2364	139.7%	139.7%	139.7%	2364	139.7%	139.7%		
4A	4A	44	343	37	306	7073	64	649	17.6%	14079	16.9%	16.9%	16.9%	14079	16.9%	16.9%		
4A	4A	45	349	42	367	9785	69	716	16.8%	16867	19.1%	19.1%	19.1%	16867	19.1%	19.1%		
4A Totals	4A Totals	127	7112	42	367	9785	69	716	16.8%	16867	19.1%	19.1%	19.1%	16867	19.1%	19.1%		

Appendix Table 3 (continued)

Appendix Table 3. [continued]

Rural Community	Regulatory Area	Number of SHARCs Issued	Set Hook Gear			Hook & Line or Handline			All Gear				
			Estimated Number Respondents	Estimated Number Halibut Harvested	Estimated Pounds Halibut Harvested	Estimated Number Respondents	Estimated Number Halibut Harvested	Estimated Pounds Halibut Harvested	Estimated Number Respondents	Estimated Number Halibut Harvested	Confidence Interval for Number of Halibut	Estimated Pounds Halibut Harvested	Confidence Interval for Pounds of Halibut
			Fished	Harvested	Harvested	Fished	Harvested	Harvested	Fished	Harvested	Halibut	Harvested	Halibut
ADAK	4B	13	2	13	364	2	2	116	2	15	72.6%	480	73.0%
ATKA	4B	12	4	16	795	0	0	0	4	16	259.8%	795	259.8%
	4B Totals	25	6	29	1158.75	2	2	116.25	6	31	78.5%	1275	76.8%
ST GEORGE ISLAND	4C	8	0	0	0	4	7	289	4	7	0.0%	289	0.0%
ST PAUL ISLAND	4C	5											
	4C Totals	13	2	30	225	6	11	348.75	6	41	180.4%	574	141.1%
GAMBELL	4D	1											
SAVOONGA	4D	2											
	4D Totals	3	0	0	0	0	0	0	0	0	0.0%	0	0.0%
ALEKNAGIK	4E	4											
BETHEL	4E	5											
CHEFORNAK	4E	3											
CHEVAK	4E	5											
CLARKS POINT	4E	1											
DILLINGHAM	4E	44	5	12	170	1	7	264	6	19	46.1%	434	59.8%
EEK	4E	1											
EMMONAK	4E	1											
GOODNEWS BAY	4E	2											
HOOPER BAY	4E	8	0	0	0	0	0	0	0	0	0.0%	0	0.0%
KING SALMON	4E	5											
KIPNUK	4E	1											
KONGIGANAK	4E	3											
KOTLIK	4E	1											
KOYUK	4E	1											
MANOKOTAK	4E	2											
MEKORYUK	4E	2											
NAKNEK	4E	5											
NEWTOK	4E	1											
NIGHTMUTE	4E	24	2	68	456	15	359	3829	15	427	55.7%	4284	50.8%
NOME	4E	11	9	0	0	0	0	0	9	0	0.0%	0	0.0%
PLATINUM	4E	1											
PORT HEIDEN	4E	1											
QUINHAGAK	4E	4											
SCAMMON BAY	4E	5											
SHELDON POINT	4E	1											
SOUTH NAKNEK	4E	3											
TELLER	4E	2											
TOGIK	4E	3											
TOKSOOK BAY	4E	3											
	4E Totals	153	24	108	1232	36	519	6889	55	627	29.7%	8221	34.5%
Rural Community Subtotals	All Regulatory Areas	7,869	2897	22999	494716	1321	10376	186714	3586	33375	3.3%	681430	3.0%

Tribal Name Subtotals	Regulatory Area	Number of SHARCs Issued	Set Hook Gear			Hook & Line or Handline			All Gear				
			Estimated Number Respondents	Estimated Number Halibut Harvested	Estimated Pounds Halibut Harvested	Estimated Number Respondents	Estimated Number Halibut Harvested	Estimated Pounds Halibut Harvested	Estimated Number Respondents	Estimated Number Halibut Harvested	Confidence Interval for Number of Halibut	Estimated Pounds Halibut Harvested	Confidence Interval for Pounds of Halibut
			Fished	Harvested	Harvested	Fished	Harvested	Harvested	Fished	Harvested	Halibut	Harvested	Halibut
Tribal Name Subtotals	All	6,437	1336	14042	329290	1062	8458	167502	2035	22500	6.2%	496792	6.6%
Rural Community Subtotals	All	7,869	2897	22999	494716	1321	10376	186714	3586	33375	3.3%	681430	3.0%
Grand Totals	All	14,306	4233	37041	824006	2383	18834	354216	5621	55875	3.0%	1178222	3.0%

[continued]

Appendix Table 4. Estimated Subsistence and Sport Harvests of Halibut and Harvests of Lingcod and Rockfish by Place of Residence, 2005

Place of Residence ¹	Number of SHARCs Issued ²	Subsistence Fished	Subsistence Harvest		Sport Fished	Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
		Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Lingcod	Estimated Number Respondents	Estimated Number Rockfish
ADAK	13	1	8	240	2	4	352	0	0	1	10
AKHIOK	22	16	130	3,231	0	0	0	0	0	0	0
AKUTAN	49	47	602	15,011	17	9	273	1	12	21	96
ALEKNAGIK	4										
ANCHOR POINT	11	0	0	0	4	16	288	0	0	0	0
ANCHORAGE	221	39	666	15,474	47	236	5,146	16	46	18	202
ANGOON	172	89	1,231	25,166	24	97	1,532	2	11	20	121
ATKA	12	4	16	795	0	0	0	0	0	7	63
AUKE BAY	2										
BETHEL	8	5	38	752	0	0	0	0	0	0	0
BIG LAKE	2										
CHEFORNAK	20	13	271	2,746	0	0	0	0	0	0	0
CHENEGA BAY	18	13	302	7,107	6	36	916	7	23	11	197
CHEVAK	13	9	20	404	0	0	0	0	0	0	0
CHIGNIK	31	19	199	4,958	7	25	739	3	4	6	47
CHIGNIK LAGOON	42	30	226	4,971	5	29	773	0	0	2	7
CHIGNIK LAKE	8	6	32	533	5	30	210	0	0	0	0
CHINIAC	21	14	190	3,670	6	23	614	0	0	4	29
CHUGIAK	7	1	41	635	1	5	102	0	0	0	0
CLARKS POINT	4										
COFFMAN COVE	46	25	266	4,851	16	60	1,020	1	1	6	64
COLD BAY	24	14	229	2,983	12	79	1,561	2	55	1	13
COPPER CENTER	2										
CORDOVA	602	281	2,672	47,141	179	554	10,519	35	62	62	361
CRAIG	499	231	2,328	43,620	176	933	14,531	47	105	102	933
DELTA JUNCTION	3										
DILLINGHAM	62	11	52	1,297	2	0	0	0	0	1	2
DOUGLAS	17	2	41	931	2	9	217	2	3	2	21
DUTCH HARBOR	61	29	341	6,761	18	67	1,510	3	4	11	163
EAGLE RIVER	12	0	0	0	5	36	708	0	0	0	0
EDNA BAY	24	15	91	2,690	8	21	559	3	6	9	90
EEK	21	10	84	2,637	0	0	0	0	0	0	0
ELFIN COVE	20	5	47	635	1	3	160	0	0	1	1
EXCURSION INLET	2										
FAIRBANKS	9	2	8	223	4	19	338	0	0	2	2
FALSE PASS	10	8	158	2,231	0	0	0	3	96	0	0
FRITZ CREEK	2										
GAMBELL	7	0	0	0	0	0	0	0	0	0	0
GLENNALLEN	4										

[continued]

Appendix Table 4. [continued]

Place of Residence ¹	Number of SHARCs Issued ²	Subsistence Fished	Subsistence Harvest		Sport Fished	Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
		Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Lingcod	Estimated Number Respondents	Estimated Number Rockfish
GOLOVIN	1										
GOODNEWS BAY	17	9	185	2,986	2	0	0	2	5	0	0
GUSTAVUS	77	37	400	8,281	26	110	2,400	2	6	5	22
HAINES	556	247	1,372	29,531	103	154	3,517	9	17	29	121
HOLLIS	5										
HOMER	28	11	108	1,770	7	53	1,208	4	13	0	0
HOONAH	334	126	1,255	25,371	61	298	5,503	10	20	24	161
HOOPER BAY	93	34	232	3,550	2	8	58	2	10	2	11
HYDABURG	186	71	622	25,614	19	43	1,793	18	141	46	646
HYDER	39	23	116	2,978	5	15	396	4	5	9	32
JUNEAU	419	102	1,179	26,475	64	246	5,730	11	23	24	180
KAKE	163	58	792	19,318	21	72	2,223	7	12	15	101
KALSKAG	1										
KARLUK	1										
KASAAN	19	12	119	3,333	7	8	215	4	11	7	55
KASILOF	7	1	41	635	0	0	0	0	0	0	0
KENAI	57	13	198	3,405	31	101	1,763	4	9	1	3
KETCHIKAN	882	224	1,719	44,268	157	522	11,066	31	51	81	651
KING COVE	61	31	330	8,432	9	44	945	5	68	8	213
KING SALMON	4										
KIPNUK	87	38	368	4,508	4	0	0	0	0	0	0
KLAWOCK	320	114	1,096	21,591	58	293	5,179	29	71	50	495
KODIAK	1,741	871	10,694	210,828	669	3,862	82,455	98	253	183	1,642
KONGIGANAK	13	5	38	638	0	0	0	0	0	0	0
KWIGILLINGOK	45	10	79	1,505	0	0	0	0	0	0	0
LARSEN BAY	39	21	262	4,303	14	80	2,291	6	14	11	146
LOWER KALSKAG	2										
MANOKOTAK	2										
MARSHALL	1										
MCGRATH	4										
MEKORYUK	15	9	216	1,964	1	1	20	1	13	0	0
METLAKATLA	414	120	786	16,938	64	88	2,382	27	31	35	126
MEYERS CHUCK	14	8	40	1,400	0	0	0	1	3	3	13
NAKNEK	10	8	16	717	2	0	0	2	1	0	0
NANWALEK	37	32	875	9,617	7	160	933	11	25	25	230
NAPAKIAK	3										
NAUKATI	11	7	45	1,071	7	25	559	0	0	4	40
NELSON LAGOON	1										

[continued]

Appendix Table 4. [continued]

Place of Residence ¹	Number of SHARCs Issued ²	Subsistence Fished	Subsistence Harvest		Sport Fished	Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
		Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Lingcod	Estimated Number Respondents	Estimated Number Rockfish
NEWTOK	5										
NIGHTMUTE	31	23	485	4,688	0	0	0	0	0	0	0
NIKISKI	7	1	10	327	1	5	102	1	3	1	3
NIKOLSKI	18	15	96	3,984	2	8	788	0	0	0	0
NINILCHIK	62	21	404	10,462	9	32	576	2	14	4	163
NOME	15	9	0	0	2	0	0	0	0	0	0
NORTH POLE	4										
NUNAPITCHUK	1										
OLD HARBOR	74	55	327	8,517	30	102	2,365	0	0	0	0
OUZINKIE	43	35	263	7,984	11	40	1,444	8	23	9	136
PALMER	4										
PELICAN	57	34	276	7,816	19	113	2,661	21	46	15	193
PERRYVILLE	38	26	184	4,345	5	8	506	2	1	5	17
PETERSBURG	1,197	436	3,305	61,372	312	1,246	23,289	28	56	72	410
PLATINUM	1										
POINT BAKER	28	17	70	1,857	7	1	45	1	1	8	65
PORT ALEXANDER	25	18	152	3,448	5	3	67	5	6	7	36
PORT GRAHAM	52	18	646	11,127	9	45	488	0	0	2	2
PORT HEIDEN	1										
PORT LIONS	84	41	467	8,765	50	258	6,126	2	3	2	8
PORT PROTECTION	1										
PORT WILLIAM	1										
QUINHAGAK	16	10	73	2,874	0	0	0	0	0	0	0
SAND POINT	321	100	1,356	21,901	23	89	1,281	7	11	18	125
SAVOONGA	44	15	99	5,813	0	0	0	0	0	4	4
SAXMAN	15	12	183	15,751	2	1	40	0	0	2	6
SCAMMON BAY	7	3	28	269	0	0	0	0	0	0	0
SELDOVIA	123	68	1,311	19,874	48	373	6,058	9	18	22	111
SEWARD	10	1	15	344	1	6	121	0	0	0	0
SHISHMAREF	1										
SITKA	1,974	814	6,062	146,319	417	2,450	55,913	269	639	376	2,514
SKAGWAY	62	28	137	3,160	20	49	858	1	1	1	2
SOLDOTNA	18	3	21	355	12	44	987	0	0	0	0
SOUTH NAKNEK	3										
ST GEORGE ISLAND	32	14	97	2,089	0	0	0	0	0	0	0
ST PAUL ISLAND	218	24	377	7,835	1	5	336	3	9	4	141
STERLING	4										
TATITLEK	30	14	167	4,942	1	3	76	5	4	10	78

[continued]

Appendix Table 4. [continued]

Place of Residence ¹	Number of SHARCs Issued ²	Subsistence Fished	Subsistence Harvest		Sport Fished	Sport Harvest		Lingcod Bycatch		Rockfish Bycatch	
		Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Halibut	Estimated Pounds Halibut ³	Estimated Number Respondents	Estimated Number Lingcod	Estimated Number Respondents	Estimated Number Rockfish
TELLER	2										
TENAKEE SPRINGS	44	27	132	3,750	20	52	946	2	2	11	93
THORNE BAY	134	67	346	10,387	49	118	2,500	10	11	28	273
TOGIAK	10	0	0	0	0	0	0	0	0	0	0
TOKSOOK BAY	522	61	1,144	14,870	2	5	98	2	8	1	6
TRAPPER CREEK	2										
TUNUNAK	70	20	297	2,661	0	0	0	0	0	0	0
TWIN HILLS	1										
UNALAKLEET	1										
UNALASKA	89	59	562	11,348	11	41	929	8	15	11	80
VALDEZ	26	20	314	8,090	8	25	385	4	4	9	67
WARD COVE	46	12	86	2,059	11	27	645	7	9	5	38
WASILLA	28	3	25	646	11	25	556	0	0	0	0
WHALE PASS	6	0	0	0	0	0	0	0	0	0	0
WHITE MOUNTAIN	1										
WHITTIER	2										
WILLOW	1										
WRANGELL	530	228	1,692	38,805	129	288	6,192	11	44	41	310
YAKUTAT	118	71	1,063	34,394	19	94	3,024	39	186	26	168
Alaska Subtotals	14,076	5,621	55,875	1,178,222	3,145	14,086	293,198	862	2,355	1,544	12,395
Non-Alaska Subtotals⁴	230	0	0	0	2	9	217	0	0	0	0
GRAND TOTALS	14,306	5,621	55,875	1,178,222	3,147	14,096	293,415	862	2,355	1,544	12,395

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

² SHARC = subsistence halibut registration certificate

³ Pounds net weight; converted from reported pounds round weight. Net weight = 75% of round weight.

⁴ Note that members of eligible Alaska tribes could obtain SHARCs regardless of their place of residence. All non-Alaska resident SHARC holders were members of eligible tribes.

Source: Alaska Department of Fish and Game, Division of Subsistence SHARC Survey, 2006

Appendix Table 5. Estimated Subsistence Harvests of Halibut by Gear Type and Place of Residence, 2005

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Harvest by Gear Type								
		Set Hook Gear			Hook and Line or Handline			All Gear		
		Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³
ADAK	13	1	7	182	1	1	58	1	8	240
AKHIOK	22	0	0	0	16	130	3,231	16	130	3,231
AKUTAN	49	11	104	1,242	42	498	13,769	47	602	15,011
ALEKNAGIK	4									
ANCHOR POINT	11	0	0	0	0	0	0	0	0	0
ANCHORAGE	221	25	485	11,505	20	181	3,969	39	666	15,474
ANGOON	172	79	1,035	21,848	34	196	3,317	89	1,231	25,166
ATKA	12	4	16	795	0	0	0	4	16	795
AUKE BAY	2									
BETHEL	8	0	0	0	5	38	752	5	38	752
BIG LAKE	2									
CHEFORNAK	20	1	48	659	13	223	2,087	13	271	2,746
CHENEGA BAY	18	13	261	5,411	9	41	1,697	13	302	7,107
CHEVAK	13	2	0	0	7	20	404	9	20	404
CHIGNIK	31	6	77	1,760	19	121	3,198	19	199	4,958
CHIGNIK LAGOON	42	19	107	2,574	21	119	2,397	30	226	4,971
CHIGNIK LAKE	8	1	5	200	5	27	333	6	32	533
CHINIAK	21	11	132	2,511	7	58	1,159	14	190	3,670
CHUGIAK	7	0	0	0	1	41	635	1	41	635
CLARKS POINT	4									
COFFMAN COVE	46	22	189	3,766	7	77	1,086	25	266	4,851
COLD BAY	24	11	127	1,778	10	102	1,204	14	229	2,983
COPPER CENTER	2									
CORDOVA	602	238	1,970	34,907	104	701	12,234	281	2,672	47,141
CRAIG	499	201	1,788	34,440	79	539	9,180	231	2,328	43,620
DELTA JUNCTION	3									
DILLINGHAM	62	9	37	846	5	14	450	11	52	1,297
DOUGLAS	17	2	24	572	2	17	358	2	41	931
DUTCH HARBOR	61	19	195	3,523	18	146	3,237	29	341	6,761
EAGLE RIVER	12	0	0	0	0	0	0	0	0	0
EDNA BAY	24	15	83	2,594	3	8	96	15	91	2,690
EEK	21	0	0	0	10	84	2,637	10	84	2,637
ELFIN COVE	20	4	17	330	3	29	305	5	47	635
EXCURSION INLET	2									
FAIRBANKS	9	2	8	223	0	0	0	2	8	223
FALSE PASS	10	3	65	975	5	93	1,256	8	158	2,231
FRITZ CREEK	2									
GAMBELL	7	0	0	0	0	0	0	0	0	0
GLENNALLEN	4									
GOLOVIN	1									

[continued]

Appendix Table 5. Continued

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Harvest by Gear Type								
		Set Hook Gear			Hook and Line or Handline			All Gear		
		Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³
GOODNEWS BAY	17	2	28	446	9	157	2,540	9	185	2,986
GUSTAVUS	77	30	334	6,970	16	66	1,311	37	400	8,281
HAINES	556	239	1,280	27,686	28	92	1,845	247	1,372	29,531
HOLLIS	5									
HOMER	28	3	53	879	8	55	891	11	108	1,770
HOONAH	334	97	869	17,398	55	386	7,973	126	1,255	25,371
HOOPER BAY	93	5	18	58	31	213	3,493	34	232	3,550
HYDABURG	186	67	567	23,130	16	55	2,483	71	622	25,614
HYDER	39	23	102	2,627	6	14	351	23	116	2,978
JUNEAU	419	78	833	19,111	49	345	7,364	102	1,179	26,475
KAKE	163	57	704	17,606	20	87	1,712	58	792	19,318
KALSKAG	1									
KARLUK	1									
KASAAN	19	12	97	2,770	2	22	563	12	119	3,333
KASILOF	7	0	0	0	1	41	635	1	41	635
KENAI	57	5	33	641	9	166	2,764	13	198	3,405
KETCHIKAN	882	176	1,311	35,097	77	408	9,172	224	1,719	44,268
KING COVE	61	13	112	2,549	23	218	5,883	31	330	8,432
KING SALMON	4									
KIPNUK	87	0	0	0	38	368	4,508	38	368	4,508
KLAWOCK	320	87	727	16,644	40	369	4,947	114	1,096	21,591
KODIAK	1,741	650	7,257	146,781	398	3,436	64,047	871	10,694	210,828
KONGIGANAK	13	0	0	0	5	38	638	5	38	638
KWIGILLINGOK	45	0	0	0	10	79	1,505	10	79	1,505
LARSEN BAY	39	10	136	1,667	17	126	2,636	21	262	4,303
LOWER KALSKAG	2									
MANOKOTAK	2									
MARSHALL	1									
MCGRATH	4									
MEKORYUK	15	5	149	1,283	8	67	680	9	216	1,964
METLAKATLA	414	100	600	14,469	47	185	2,469	120	786	16,938
MEYERS CHUCK	14	6	34	1,254	3	6	146	8	40	1,400
NAKNEK	10	8	14	680	2	2	38	8	16	717
NANWALEK	37	25	464	5,577	29	411	4,040	32	875	9,617
NAPAKIAK	3									
NAUKATI	11	6	41	1,023	1	4	48	7	45	1,071
NELSON LAGOON	1									
NEWTOK	5									
NIGHTMUTE	31	4	68	456	21	417	4,232	23	485	4,688
NIKISKI	7	1	10	327	0	0	0	1	10	327

(continued)

Appendix Table 5. Continued

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Harvest by Gear Type								
		Set Hook Gear			Hook and Line or Handline			All Gear		
		Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³
NIKOLSKI	18	0	0	0	15	96	3,984	15	96	3,984
NINILCHIK	62	13	183	6,166	13	221	4,296	21	404	10,462
NOME	15	9	0	0	0	0	0	9	0	0
NORTH POLE	4									
NUNAPITCHUK	1									
OLD HARBOR	74	9	60	2,071	47	268	6,446	55	327	8,517
OUZINKIE	43	23	174	5,311	22	89	2,673	35	263	7,984
PALMER	4									
PELICAN	57	27	234	6,891	9	42	926	34	276	7,816
PERRYVILLE	38	17	140	3,423	15	44	923	26	184	4,345
PETERSBURG	1,197	338	2,321	44,050	175	984	17,321	436	3,305	61,372
PLATINUM	1									
POINT BAKER	28	16	64	1,722	4	6	135	17	70	1,857
PORT ALEXANDER	25	16	140	3,156	5	12	292	18	152	3,448
PORT GRAHAM	52	8	359	7,938	18	287	3,190	18	646	11,127
PORT HEIDEN	1									
PORT LIONS	84	31	344	5,795	17	123	2,969	41	467	8,765
PORT PROTECTION	1									
PORT WILLIAM	1									
QUINHAGAK	16	1	5	281	10	68	2,593	10	73	2,874
SAND POINT	321	35	777	12,201	77	579	9,700	100	1,356	21,901
SAVOONGA	44	15	99	5,813	0	0	0	15	99	5,813
SAXMAN	15	12	101	5,740	11	83	10,011	12	183	15,751
SCAMMON BAY	7	0	0	0	3	28	269	3	28	269
SELDOVIA	123	28	453	7,182	55	858	12,692	68	1,311	19,874
SEWARD	10	0	0	0	1	15	344	1	15	344
SHISHMAREF	1									
SITKA	1,974	738	4,988	126,426	172	1,074	19,893	814	6,062	146,319
SKAGWAY	62	25	105	2,548	6	32	612	28	137	3,160
SOLDOTNA	18	1	8	120	1	13	235	3	21	355
SOUTH NAKNEK	3									
ST GEORGE ISLAND	32	5	30	863	9	67	1,226	14	97	2,089
ST PAUL ISLAND	218	14	224	4,131	17	152	3,704	24	377	7,835
STERLING	4									
TATITLEK	30	14	134	4,204	10	33	738	14	167	4,942
TELLER	2									
TENAKEE SPRINGS	44	23	102	3,213	4	30	538	27	132	3,750
THORNE BAY	134	50	258	8,274	23	87	2,114	67	346	10,387
TOGIK	10	0	0	0	0	0	0	0	0	0
TOKSOOK BAY	522	5	69	602	60	1,075	14,269	61	1,144	14,870

[continued]

Appendix Table 5. Continued

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Harvest by Gear Type								
		Set Hook Gear			Hook and Line or Handline			All Gear		
		Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³	Estimated Number Respondents Fished	Estimated Number Fish Harvested	Estimated Pounds Fish Harvested ³
TRAPPER CREEK	2									
TUNUNAK	70	3	44	332	18	253	2,329	20	297	2,661
TWIN HILLS	1									
UNALAKLEET	1									
UNALASKA	89	41	318	6,049	39	244	5,298	59	562	11,348
VALDEZ	26	20	314	8,090	0	0	0	20	314	8,090
WARD COVE	46	12	86	2,059	0	0	0	12	86	2,059
WASILLA	28	3	25	646	0	0	0	3	25	646
WHALE PASS	6	0	0	0	0	0	0	0	0	0
WHITE MOUNTAIN	1									
WHITTIER	2									
WILLOW	1									
WRANGELL	530	207	1,375	33,043	75	317	5,763	228	1,692	38,805
YAKUTAT	118	55	788	24,185	33	275	10,209	71	1,063	34,394
Alaska Subtotal	14,076	4,233	37,041	824,006	2,383	18,834	354,216	5,621	55,875	1,178,222
Non-Alaska Subtotal ⁴	230	0	0	0	0	0	0	0	0	0
GRAND TOTALS	14,306	4,233	37,041	824,006	2,383	18,834	354,216	5,621	55,875	1,178,222

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

² SHARC = subsistence halibut registration certificate

³ Pounds net weight; converted from reported pounds round weight. Net weight = 75% of round weight.

⁴ Note that members of eligible Alaska tribes could obtain SHARCs regardless of their place of residence. All non-Alaska resident SHARC holders were members of eligible tribes.

Source: Alaska Department of Fish and Game, Division of Subsistence SHARC Survey, 2005

Appendix Table 6. Estimated Number of SHARC Holders Who Either Subsistence or Sport Fished for Halibut by Place of Residence, 2005

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Number Subsistence or Sport Fished
ADAK	13	3
AKHIOK	22	16
AKUTAN	49	47
ALEKNAGIK	4	
ANCHOR POINT	11	4
ANCHORAGE	221	70
ANGOON	172	96
ATKA	12	4
AUKE BAY	2	
BETHEL	8	5
BIG LAKE	2	
CHEFORNAK	20	13
CHENEGA BAY	18	13
CHEVAK	13	9
CHIGNIK	31	19
CHIGNIK LAGOON	42	30
CHIGNIK LAKE	8	6
CHINIAK	21	14
CHUGIAK	7	3
CLARKS POINT	4	
COFFMAN COVE	46	31
COLD BAY	24	15
COPPER CENTER	2	
CORDOVA	602	358
CRAIG	499	299
DELTA JUNCTION	3	
DILLINGHAM	62	13
DOUGLAS	17	2
DUTCH HARBOR	61	35
EAGLE RIVER	12	5
EDNA BAY	24	16
EEK	21	10
ELFIN COVE	20	5
EXCURSION INLET	2	
FAIRBANKS	9	4
FALSE PASS	10	8
FRITZ CREEK	2	
GAMBELL	7	0
GLENNALLEN	4	
GOLOVIN	1	
GOODNEWS BAY	17	10
GUSTAVUS	77	53
HAINES	556	282
[continued]		

Appendix Table 6. [continued]

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Number Subsistence or Sport Fished
HOLLIS	5	
HOMER	28	14
HOONAH	334	153
HOOPER BAY	93	34
HYDABURG	186	72
HYDER	39	24
JUNEAU	419	142
KAKE	163	63
KALSKAG	1	
KARLUK	1	
KASAAN	19	17
KASILOF	7	1
KENAI	57	36
KETCHIKAN	882	295
KING COVE	61	31
KING SALMON	4	
KIPNUK	87	38
KLAWOCK	320	133
KODIAK	1,741	1,116
KONGIGANAK	13	5
KWIGILLINGOK	45	10
LARSEN BAY	39	23
LOWER KALSKAG	2	
MANOKOTAK	2	
MARSHALL	1	
MCGRATH	4	
MEKORYUK	15	9
METLAKATLA	414	153
MEYERS CHUCK	14	8
NAKNEK	10	8
NANWALEK	37	32
NAPAKIAK	3	
NAUKATI	11	10
NELSON LAGOON	1	
NEWTOK	5	
NIGHTMUTE	31	23
NIKISKI	7	3
NIKOLSKI	18	15
NINILCHIK	62	28
NOME	15	9
NORTH POLE	4	
NUNAPITCHUK	1	
OLD HARBOR	74	60
OUZINKIE	43	35
PALMER	4	
[continued]		

Appendix Table 6. [continued]

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Number Subsistence or Sport Fished
PELICAN	57	42
PERRYVILLE	38	27
PETERSBURG	1,197	569
PLATINUM	1	
POINT BAKER	28	22
PORT ALEXANDER	25	19
PORT GRAHAM	52	18
PORT HEIDEN	1	
PORT LIONS	84	69
PORT PROTECTION	1	
PORT WILLIAM	1	
QUINHAGAK	16	10
SAND POINT	321	105
SAVOONGA	44	15
SAXMAN	15	12
SCAMMON BAY	7	3
SELDOVIA	123	90
SEWARD	10	1
SHISHMAREF	1	
SITKA	1,974	987
SKAGWAY	62	41
SOLDOTNA	18	13
SOUTH NAKNEK	3	
ST GEORGE ISLAND	32	14
ST PAUL ISLAND	218	24
STERLING	4	
TATITLEK	30	14
TELLER	2	
TENAKEE SPRINGS	44	34
THORNE BAY	134	81
TOGIAK	10	0
TOKSOOK BAY	522	62
TRAPPER CREEK	2	
TUNUNAK	70	20
TWIN HILLS	1	
UNALAKLEET	1	
UNALASKA	89	62
VALDEZ	26	20
WARD COVE	46	16
WASILLA	28	14
WHALE PASS	6	0
WHITE MOUNTAIN	1	
WHITTIER	2	
WILLOW	1	
[continued]		

Appendix Table 6. [continued]

Place of Residence ¹	Number of SHARCs Issued ²	Estimated Number Subsistence or Sport Fished
WRANGELL	530	270
YAKUTAT	118	78
Alaska Total	14,076	6,874
Non-Alaska Total ³	230	2
GRAND TOTALS	14,306	6,876

¹ To protect confidentiality, data for communities with 5 or fewer SHARCs issued are not reported in this table. Subtotals include all SHARC holders.

² SHARC = subsistence halibut registration certificate.

³ Note that members of eligible Alaska tribes could obtain SHARCs regardless of their place of residence. All non-Alaska resident SHARC holders were members of eligible tribes.

Source: Alaska Department of Fish and Game, Division of Subsistence
SHARC Survey, 2006

Tribal Name	Regulatory				Regulatory				Regulatory				Regulatory			
	Return Rate	SHARCS Survey	SHARCS Returned Percent	Estimated Number Respondents	Estimated Percent of SHARCS	Estimated Number Fish	Estimated Number Pounds	Estimated Number Respondents	Estimated Percent of SHARCS	Estimated Number Fish	Estimated Number Pounds	Estimated Number Respondents	Estimated Percent of SHARCS	Estimated Number Fish	Estimated Number Pounds	Estimated Number Respondents
PETERSBURG BURN ASSOCIATION	118	68	57.6%	35	29.4%	4014	58	22.1%	35	0.8%	1103	58	22.1%	58	1103	3
PRINCE ISLANDS ALIUT COMUNITY OF ST GEORGE	25	5	20.0%	10	40.0%	1800	0	0.0%	1	0.0%	0	0	0.0%	0	0	0
PRINCE ISLANDS ALIUT COMUNITY OF SAND POINT VILLAGE	224	125	55.8%	30	13.3%	7497	395	5.3%	1	0.0%	395	3	0.8%	3	395	3
PRINCE ISLANDS ALIUT COMUNITY OF ST PAUL	50	30	60.0%	10	20.0%	13751	1076	7.8%	18	0.1%	293	18	6.5%	18	293	0
DOGAN TOWNLAND PRINCE OF SAND POINT VILLAGE	11	10	90.9%	17	155.5%	2167	0	0.0%	11	0.5%	0	0	0.0%	0	0	0
DUNAWASH PRINCE OF TAPACHA	21	11	52.4%	10	47.6%	5530	13	0.2%	10	0.2%	1032	7	7.7%	7	1032	4
SLEWVA TRIBE OF KOOKAK	155	95	61.3%	65	41.9%	20011	1127	5.6%	30	0.1%	4427	150	3.3%	150	4427	15
SKOOKVA TRIBE OF KOOKAK	175	99	56.5%	10	5.7%	6023	500	8.3%	3	0.0%	6023	3	0.0%	3	6023	4
SKOOKVA TRIBE OF KOOKAK	141	87	61.7%	33	23.4%	15333	501	3.3%	6	0.0%	1500	27	1.8%	27	1500	4
WAVAIAT TUNGIT TRIBE	58	30	51.7%	33	56.7%	15333	501	3.3%	6	0.0%	1500	27	1.8%	27	1500	4
WAVAIAT TUNGIT TRIBE	97	67	69.1%	35	35.1%	6023	500	8.3%	3	0.0%	6023	3	0.0%	3	6023	4
WAVAIAT TUNGIT TRIBE	13	10	76.9%	3	23.1%	653	21	3.2%	10	1.5%	653	10	1.5%	10	653	3
VILLAGE OF SALAMARTI	45	30	66.7%	30	66.7%	3081	145	4.7%	8	0.3%	694	20	2.9%	20	694	0
VILLAGE OF OLD HARBOR	8	1	12.5%	0	0.0%	0	0	0.0%	0	0.0%	150	0	0.0%	0	150	0
VILLAGE OF KANATAK	3	1	33.3%	3	100.0%	150	8	5.3%	0	0.0%	150	0	0.0%	0	150	0
VILLAGE OF CLARK'S POINT	17	14	82.4%	13	76.5%	2745	271	9.9%	0	0.0%	0	0	0.0%	0	0	0
VILLAGE OF CHERFORM	11	4	36.4%	0	0.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
UCASHK VILLAGE	2	2	100.0%	2	100.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
TRADITIONAL VILLAGE OF TOGWAK	11	4	36.4%	0	0.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
SOUTH MAJIEE VILLAGE	2	2	100.0%	2	100.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
SWAGWAY VILLAGE	1	1	100.0%	1	100.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
SIWA TRIBE OF ALSVA	435	252	58.1%	148	34.0%	28777	1124	3.9%	40	0.1%	149	3100	9.2%	149	3100	48
SIWA TRIBE OF ALSVA	118	68	57.6%	35	29.4%	4014	58	22.1%	35	0.8%	1103	58	22.1%	58	1103	3
SUNAWA VILLAGE TRIBE	155	95	61.3%	65	41.9%	20011	1127	5.6%	30	0.1%	4427	150	3.3%	150	4427	15
SUNAWA VILLAGE TRIBE	29	10	34.5%	10	34.5%	5930	290	4.9%	10	0.1%	1032	7	7.7%	7	1032	4
TOGAK TRIBE OF KOOKAK	31	11	35.5%	17	54.8%	2167	137	6.3%	18	0.8%	293	18	6.5%	18	293	0
TOGAK TRIBE OF KOOKAK	50	30	60.0%	10	20.0%	13751	1076	7.8%	18	0.1%	293	18	6.5%	18	293	0
TONGAN TOWNLAND PRINCE OF SAND POINT VILLAGE	224	125	55.8%	30	13.3%	7497	395	5.3%	1	0.0%	395	3	0.8%	3	395	0
PRINCE ISLANDS ALIUT COMUNITY OF ST GEORGE	25	5	20.0%	10	40.0%	1800	0	0.0%	1	0.0%	0	0	0.0%	0	0	0
PRINCE ISLANDS ALIUT COMUNITY OF SAND POINT VILLAGE	11	10	90.9%	17	155.5%	2167	0	0.0%	11	0.5%	0	0	0.0%	0	0	0
PETERSBURG BURN ASSOCIATION	118	68	57.6%	35	29.4%	4014	58	22.1%	35	0.8%	1103	58	22.1%	58	1103	3

Tribal Name Subtotal	6.137	2,120	18.5%	2,035	31.6%	22,590	196,792	0.21	12.8%	2,817	62,130	268
Rockfish Bycatch	191	920	1,200									

Rural Community	Regulatory				Regulatory				Regulatory				Regulatory			
	Return Rate	SHARCS Survey	SHARCS Returned Percent	Estimated Number Respondents	Estimated Percent of SHARCS	Estimated Number Fish	Estimated Number Pounds	Estimated Number Respondents	Estimated Percent of SHARCS	Estimated Number Fish	Estimated Number Pounds	Estimated Number Respondents	Estimated Percent of SHARCS	Estimated Number Fish	Estimated Number Pounds	Estimated Number Respondents
ADAK	12	10	76.9%	2	16.4%	400	15	3.8%	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
ADAK	4	4	100.0%	4	100.0%	0	0	0.0%	0	0.0%	0	0	0.0%	0	0	0
ADAK	33	21	63.6%	17	51.6%	4235	184	4.3%	5	14.6%	315	11	14.6%	11	315	2
ADAK	12	4	33.3%	4	33.3%	16	16	795	0	0.0%	0	0	0.0%	0	0	0
ADAK	5	5	100.0%	5	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	3	2	66.7%	3	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	12	7	58.3%	5	42.0%	195	195	3203	4	32.1%	27	368	37.1%	3	117	117
ADAK	11	9	81.8%	8	69.3%	1377	84	1377	7	20.5%	7	117	117	7	117	7
ADAK	10	4	40.0%	3	30.0%	1005	55	1005	0	0.0%	0	0	0.0%	0	0	0
ADAK	4	2	50.0%	2	50.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	2	2	100.0%	2	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	45	38	84.4%	25	55.5%	4551	255	4551	15	36.6%	60	1025	1025	1	55	55
ADAK	21	10	47.6%	13	60.8%	2650	110	2650	10	45.8%	195	55	45.8%	55	195	64
ADAK	47	38	81.4%	25	55.5%	4551	255	4551	15	36.6%	60	1025	1025	1	55	55
ADAK	52	37	71.2%	31	59.7%	4040	173	4040	12	22.5%	18	315	315	4	9	9
ADAK	477	387	81.1%	225	59.7%	25557	1158	25557	95	19.8%	177	3085	3085	17	1158	1158
ADAK	76	57	75.0%	37	49.2%	8281	400	8281	25	24.1%	110	2403	2403	2	6	6
ADAK	2	2	100.0%	2	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	5	5	100.0%	5	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	20	14	70.0%	5	25.0%	935	47	935	1	6.7%	3	160	160	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	52	44	84.6%	35	67.3%	4995	155	4995	15	29.0%	43	1117	1117	17	147	147
ADAK	52	35	67.3%	165	48.0%	1709	179	1709	138	39.3%	830	12091	12091	93	803	803
ADAK	542	351	64.6%	245	45.2%	4053	261	4053	163	30.0%	498	9297	9297	57	349	349
ADAK	542	351	64.6%	245	45.2%	4053	261	4053	163	30.0%	498	9297	9297	57	349	349
ADAK	21	10	47.6%	13	60.8%	2650	110	2650	10	45.8%	195	55	45.8%	55	195	64
ADAK	45	38	84.4%	25	55.5%	4551	255	4551	15	36.6%	60	1025	1025	1	55	55
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	2	2	100.0%	2	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	4	4	100.0%	4	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	10	4	40.0%	3	30.0%	1005	55	1005	0	0.0%	0	0	0.0%	0	0	0
ADAK	11	9	81.8%	8	69.3%	1377	84	1377	7	20.5%	7	117	117	7	117	7
ADAK	10	4	40.0%	3	30.0%	1005	55	1005	0	0.0%	0	0	0.0%	0	0	0
ADAK	4	2	50.0%	2	50.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	1	1	100.0%	1	100.0%	0	0	0	0	0.0%	0	0	0.0%	0	0	0
ADAK	52	44	84.6%	35	67.3%	4995	155	4995	15	29.0%	43	1117	1117	17	147	147
ADAK	52	35	67.3%	165	48.0%	1709	179	1709	138	39.3%	830	12091	12091	93	803	803
ADAK	542	351	64.6%	245	45.2%	4053	261	4053	163	30						

Appendix Table 7. (continued)

Regulatory Area	Return Rate		Substance Fished Halibut		Substance Halibut Harvest		Sport Fished Halibut		Sport Halibut Harvest		Lingcod Bycatch		Rockfish Bycatch	
	SHARCS Surveyed Percent	SHARCS Returned Percent	Estimated Number	Estimated Percent of SHARCS	Estimated Number	Estimated Percent of SHARCS	Estimated Number	Estimated Percent of SHARCS	Estimated Number	Estimated Percent of SHARCS	Estimated Number	Estimated Percent of SHARCS	Estimated Number	Estimated Percent of SHARCS
WARREN BAY	16	75.0%	8	48.2%	109	1851	5	28.6%	49	1425	3	4	4	56
MAKONAK	2													23
METLAHTLA	46	39.1%	27	58.3%	224	4261	17	37.2%	34	1033	4	7	6	
MEYERS CHUCK	14	71.4%	10	55.6%	40	1407	0	0.0%	0	0	1	3	13	
MAMNER	5													
MANNWATER	7	42.9%	4	57.1%	271	3190	0	0.0%	0	0	0	0	50	
NEWTOK	1													
NIGHTMITE	24	45.8%	15	63.5%	427	4284	0	0.0%	0	0	0	0	0	
NOELSM	7	71.4%	3	42.9%	48	2364	3	36.7%	28	938	0	0	0	
NOKE	11	36.4%	9	84.8%	0	0	2	15.2%	0	0	0	0	0	
OLD HARBOR	35	60.6%	24	68.6%	150	4233	16	45.6%	57	1429	0	0	0	
OUZBRIE	16	62.5%	10	66.1%	67	1907	3	21.4%	13	441	2	3	25	
PELFAN	48	68.8%	32	58.0%	219	6465	30	42.0%	123	2829	14	33	162	
PERMYVILLE	1													
PERRSBURG	1065	69.8%	299	37.5%	3053	56668	284	16.7%	1179	21926	26	56	406	
PLATNUM	1													
PORT ALEXANDER	36	65.4%	18	68.9%	150	3273	9	33.7%	7	133	5	6	54	
PORT GRHAM	16	43.8%	7	42.9%	177	2349	0	0.0%	0	0	0	0	0	
PORT HERBEN	1													
PORT LIONS	37	55.8%	21	65.8%	227	4595	21	65.0%	139	2720	0	0	0	
PORT PROTECTION	19	60.4%	12	64.0%	54	1413	6	32.4%	5	27	1	1	24	
PT BAKER	18	77.8%	14	65.8%	48	1286	6	34.2%	0	0	0	0	46	
QUINHAGAK	4												32	
SAND POINT	18	61.1%	11	61.1%	121	2209	6	32.3%	68	998	5	3	32	
SAVCONGA	2												11	
SAYMAN	36	61.1%	22	61.1%	110	1018	3	9.1%	55	686	0	0	11	
SCAMMON BAY	5												97	
SELEOYA	115													
SHELDON POINT	1570	68.8%	654	41.4%	4797	114622	263	22.0%	2266	51896	241	533	2152	
SITKA	50													
SKAGWAY	3													
SOUTH HAKEK	2	25.0%	4	43.8%	7	289	0	0.0%	0	0	0	0	0	
ST GEORGE ISLAND	8	83.3%	8	64.2%	75	2850	3	27.5%	10	227	3	4	54	
ST PAUL ISLAND	12													
TATELAK	2												93	
TENAKE SPRINGS	44	84.1%	27	60.6%	132	3750	20	44.4%	52	2570	2	2	29	
THOMAS BAY	124	82.1%	67	49.8%	344	1036	49	36.7%	118	946	10	11	273	
TOGAK	3													
TOKSOCK BAY	3													
UNALASKA	116	89.0%	80	88.0%	64	14079	28	24.4%	108	2429	5	7	204	
UNALASKA	27	89.9%	24	88.9%	14	1395	14	52.2%	41	1146	0	4	43	
WHALE PASS	424	71.2%	302	43.4%	1204	28041	99	23.4%	204	4233	6	37	134	
YANUTAI	63	65.1%	41	57.6%	36	538	14	21.5%	67	2125	22	10	93	
Rural Community Subtotals	7,869	5,445	69.2%	3,586	45.6%	33,375	681,430	2,224	29.5%	11,279	210,985	591	1,435	8,189
Tribal Name Subtotals	6,417	4,120	48.5%	2,035	21.6%	22,500	446,172	822	12.8%	2,817	62,130	268	920	4,206
Rural Community Subtotals	1,852	5,115	69.2%	3,586	45.6%	33,375	681,130	2,224	29.5%	11,279	230,285	591	1,435	8,189
Grand Totals	14,006	8,565	59.3%	5,621	22.3%	55,875	1,127,272	3,147	22.0%	14,096	293,115	862	2,355	12,395

* 1. Protect confidentiality, data for tribes and communities with 5 or fewer SHARCS licensed were not reported in this table. Tribal community subtotals exclude all tribes and communities.
 * 2. SHARCS = substance limited registration certificate.
 * 3. Pounds not weight, converted from reported pounds round weight. Halibut weight = 75% of round weight.

Source: Alaska Department of Fish and Game, Division of Subsistence SHARCS Survey, 2005