


MEMORANDUM

TO: Council Members

FROM: Clarence Pautzke
Executive Director 

DATE: September 25, 2001

SUBJECT: Halibut Charter IFQ Program

ESTIMATED TIME 7 HOURS

ACTION REQUIRED

Consider rescinding final action previously taken in April 2001, and take additional steps as appropriate.

BACKGROUND

Summary of past action. The Council approved an individual fishing quota (IFQ) program for the halibut charter fleet in Southeast and Southcentral Alaska on April 14, 2001. This decision culminated eight years of debate and over 8,000 comments on managing the charter halibut fishery. If approved by the Secretary of Commerce, the IFQ program would replace the guideline harvest level (GHL) program, which was approved by the Council in February 2000, and recently submitted for Secretarial review. No new information is available on this issue.

In June, the State of Alaska representative on the Council notified the Council of his plan to move to rescind the Council's April 2001 motion approving a halibut charter IFQ program. As a result, this issue was placed on the agenda for this meeting. The State's position on the halibut charter IFQ/moratorium issue is attached as Item C-1(a). Major features of the adopted program are summarized in Item C-1(b). The preferred alternative adopted by the Council is attached as Item C-1(c), and the suite of alternatives that were before the Council during final action is under Item C-1(d). A reference copy of the complete analysis is available.

Future work. The revisions necessary to submit the halibut charter IFQ EA/RIR/IRFA to the Secretary have not been completed due to necessary revisions to the halibut GHL EA/RIR/IRFA, the halibut subsistence EA/RIR, and another groundfish analysis. Additional staff work also will be required to support a proposed Charter IFQ Implementation Team comprised of industry representatives. The committee will be charged with recommending appropriate recordkeeping and reporting requirements for implementing the charter IFQ program. Staff also will support an agency implementation team, which also will recommend the implementation and enforcement design of the new program in conjunction with the industry committee. Last, the Council will initiate a trailing amendment to develop an implementation plan for the community set-aside program which was part of the original action, upon approval of the charter IFQ program by the Secretary.

State of Alaska Tony Knowles, Governor

Department of Fish and Game

Frank Rue, Commissioner

STATE POSITION ON HALIBUT CHARTER IFQ/MORATORIUM ISSUE

September 20, 2001

The State does not support the implementation of an IFQ program for Alaska's halibut charter fishery, and therefore is pursuing a rescission of the April, 2001 Council decision. The State supports the implementation of the guideline harvest level (GHL) regulations that were adopted by the Council in February 2000.

Under the GHL regulations, the charter fleets in Southeast and Southcentral Alaska receive 125 percent of their average harvest estimates between 1995 and 1999. No restrictions are to be implemented until the charter harvest exceeds these threshold levels. If the GHL is exceeded, harvest restrictions will be implemented the following season, or two seasons later, depending on how much the GHL is exceeded.

Based on harvest and effort trends in the charter fishery during recent years the State believes the regulations within the GHL program may be adequate to address future growth in the harvest of halibut in the charter fishery. However, as an added measure of protection, the State believes the Council should adopt a moratorium at this time to restrict new entrants into the halibut charter fishery.

The State also supports an expedited and time certain local area management planning (LAMP) process by the Alaska Board of Fisheries to address localized depletion and user group conflicts. The State would encourage the Board to complete this process and report back to the Council by February 2003 or earlier if possible.

SUMMARY
HALIBUT CHARTER IFQ PROGRAM

AGENDA C-1(b)
OCTOBER 2001

After two days of public testimony from more than 200 individuals, the North Pacific Fishery Management Council approved an individual fishing quota (IFQ) program for the halibut charter fleet in Southeast and Southcentral Alaska on April 14, 2001. This decision culminated eight years of debate and over 8,000 comments on managing the charter halibut fishery. The IFQ program would replace the guideline harvest level (GHL) program approved by the Council in February 2000, and currently under Secretarial review. No changes were made to the 2-fish daily bag limit or 2-day possession limit for charter anglers. The charter IFQ program could be implemented as early as 2003 if adopted by the Secretary of Commerce. Major features of the approved program will include:

1. The action does not restrict non-charter recreational anglers. It only affects charter operations.
2. The action does not permit a charter captain to sell the fish. Fish caught by charter clients belong to the client.
3. The halibut charter IFQ program would be integrated into the existing halibut commercial IFQ program. The charter sector would be allocated 125% of the average 1995-99 charter harvest to allow for growth in the fishery. The allocation equates to approximately 13% of the combined commercial and charter quota in Southeast Alaska and approximately 14% of the combined commercial and charter quota in Southcentral Alaska. This is more than 36 percent in Southeast Alaska and 37 percent in Southcentral Alaska than is presently being harvested by the charter sector.
4. Charter allocations can grow over time. Charter quota shares may not be transferred (sold) to the commercial sector. In the future, the Council will determine whether to allow a portion of charter QS to transfer to the commercial sector. Quota shares may be transferred within the charter sector. Commercial quota shares may be transferred to the charter sector. They also may be transferred back to the commercial sector. Restrictions on those commercial quota shares would continue to be applied while they are used in the commercial fishery.
5. Twenty percent of charter IFQs (an IFQ is the amount which can be harvested in any one year based on a person's number of quota shares multiplied by the quota) may be leased within the charter sector for the first three years of the program; ten percent may be leased to the commercial sector for the first five years.
6. Between 1 and 2 percent of charter QS will be set aside for underdeveloped Gulf coastal communities to develop additional charter operations (the Council will identify those communities who are eligible for developing new operations and the details for how the program will be administered in a subsequent action).
7. Charter quota will be issued to a charter vessel owner, or to a person who leased a vessel from an owner, and who carried clients in 1998 or 1999, and 2000.
8. A quota share use cap of 1 percent in Southeast Alaska and ½ percent in Southcentral Alaska as well as a cap of ½ percent for both areas combined was approved, however, anyone who is initially issued quota shares above those levels would be grandfathered into the program at their qualifying level.
9. A delay of one year between the issuance of quota shares and fishing under the IFQ program.
10. IFQs would be issued in numbers of fish (compared with pounds in the commercial program) to allow current fishing practices to continue.
11. An agency and charter industry committee will develop an implementation plan to address reporting, monitoring, and enforcement.

The Council is an advisory body to the National Marine Fisheries Service, which manages Pacific halibut in State and Federal waters off Alaska jointly with the International Pacific Halibut Commission under the authority of the Northern Pacific Halibut Act of 1982.

North Pacific Fishery Management Council
Final Motion on Halibut Charter Fishery Management
April 14, 2001

Alternative 2. Include the halibut charter sector in the existing halibut IFQ program.

IFQs are an access privilege, not an ownership right. They may be revoked or limited at any time in accordance with the North Pacific Halibut Act as well as the Magnuson-Stevens Act, and other federal laws. Charter IFQ halibut may not be sold into commerce - i.e., all sport regulations remain in effect.

Issue 1. Initial QS may be based on:

1. Equal to 125% of corrected average 1995-99 charterboat harvest.
2. (13.05% in Area 2C and 14.11% in Area 3A of a combined charter and commercial quota).
3. 100% of an individual's QS would float with abundance.

Issue 2. Initial allocation of QS would be issued to U.S. citizens or to U.S. companies on the following basis: 75% U.S. ownership

1. Charter vessel owner - person who owns the charterboat and charterboat business; and
2. Bare vessel lessee, where a lease occurred (instead of owner) - person that leases a vessel and controls its use as a charterboat for this fishery. May operate the vessel or may hire a captain/skipper. Lessee determines when the vessel sails and by whom captained.

Issue 3. Qualification Criteria

Initial issues who carried clients in 1998 or 1999 and who submitted ADF&G logbooks for an active vessel (as received by ADF&G by February 12, 2000). Initial issues will be required to be currently participating (meeting all legal requirements including filing a logbook) during season prior to final action and any year claimed during the qualifying period (currently May- Sept 20, 2000) and claimed trips must have been under the operation of a person holding a U.S. Coast Guard license. Overall, must have participated in 1998 or 1999, and 2000.

Issue 4. Distribution of QS may be based on:

70% of 1998 and 1999 logbook average with an additional 10% added for each year of operation 1995-97 (longevity reward). (Excess QS would be distributed equally among those initial issues with participation in at least one year during 1995-97).

Issue 5. Transferability of QS (permanent) and IFQs (on annual basis [leasing])

Charter QS is non-leasable

Charter QS transfers:

1. Initially issued Charter QS is fully transferrable within the charter sector.
2. For purposes of transfer to commercial sector, 75% of an individual's initially issued charter QS is permanently nontransferable and 25% may be transferrable upon Council review and approval after 3 years.
3. Commercial QS purchased by charter operator is fully transferable (two-way) across sectors and retains original designations.

Charter IFQ leasing:

1. 20% of a charter operator's annual IFQ is leasable within the charter sector for the first 3 years of the program.
2. Leasing is defined as the use of Charter IFQ on a vessel which the owner of the QS has less than a 50% ownership interest.
3. 10% of a charter operator's annual IFQ may be leased to the commercial sector for the first 5 years.

Block restrictions

1. any initially issued (i.e., unblocked) charter QS once transferred to commercial sector shall be unblocked.
2. allow splitting of commercial blocks to transfer a smaller piece to the charter sector - split blocks retain original designations.

Vessel class restrictions

1. from A, B, C, and/or D commercial vessel category sizes to charter sector, except that no charter business may own or control more than 1 "D" category block equal to or above the sweep-up level.
2. from charter to commercial at B, C, and D category.
3. initial transfer from undesignated charter only to catcher vessel of comparable size class. Buy down allowances apply (e.g., charter vessel 35'-60' must sell to C or D class commercial vessel.)

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

For the charter sector, must be either:

1. an initial charter issuee; or
2. qualified as defined by State of Alaska requirements for registered guides or businesses; and
3. fulfill all legal obligations of the charter sector; and
4. hold USCG license.

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

Issue 7. Caps

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

Issue 8. Miscellaneous provisions

1. Maximum line limit of 12 in Area 3A (remains at 6 lines for Area 2C), grandfather initial issuees at maximum lines in 2000, however, line limits in excess of the maximum are non-transferable.
2. 10% underage provision of total IFQs.
3. A one-year delay between initial issuance of QS and fishing IFQs.
4. 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 may be issued in:

Numbers of fish (based on average weight determined by ADF&G)

Issue 10. Reporting:

The Council defers design of the reporting and enforcement strategy to an IFQ technical implementation team, comprised of agency and industry. It is the intent of the Council that a more comprehensive reporting system will address the following items. The Council noted that ADF&G logbooks would not be considered sufficient for monitoring and that the team should consider fish tags and other reporting systems suggested by industry.

1. More timely, verifiable reporting of catch;
2. Enforcement concerns;
3. More accurate geographic referencing of catch location which provides for analysis of halibut harvest in LAMP districts.

Issue 11. Community set-aside (revised)

1. 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.
2. Source of the set-aside: Equal pounds from the commercial and charter sectors.
3. 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.

LAMPs

The Council also supports an expedited local area management planning (LAMP) process by the Alaska Board of Fisheries to address localized depletion and user group conflicts and other issues as appropriate. The Council encourages the Board to complete this process and report back to the Council as soon as possible.

The alternatives included in this analysis are:

Alternative 1. Status quo.

Alternative 2. Include the halibut charter sector in the existing halibut IFQ program.

Issue 1. Initial QS may be based on:

Option 1. Equal to 125% of corrected average 1995-99 charterboat harvest
(13.05% in Area 2C and 14.11% in Area 3A of a combined charter and commercial quota)

Option 2. Equal to 100% of corrected average 1998-99 charterboat harvest
(10.73% in Area 2C and 9.82% in Area 3A of a combined charter and commercial quota)

Option 3. Equal to 100% of corrected average 1995-99 charter harvest
(10.44% in Area 2C and 11.29% in Area 3A of a combined charter and commercial quota)

Suboption: 0-50% of an individual's QS initial issuance would be fixed and the remainder would float with abundance.

Issue 2. Initial allocation of QS would be issued to U.S. citizens or to U.S. companies on the following basis:

U.S. ownership based on: a) 51% ownership; b) 75% ownership

Option 1. Charter vessel owner - person who owns the charterboat and charterboat business

Option 2. Bare vessel lessee - person that leases a vessel and controls its use as a charterboat for this fishery. May operate the vessel or may hire a captain/skipper. Lessee determines when the vessel sails and by whom captained.

Issue 3. Qualification Criteria

Option 1. Initial issues who carried clients in 1998 and 1999 and who submitted ADF&G logbooks for an active vessel (as received by ADF&G by February 12, 2000)

Option 2. Initial issues who carried clients in 1998 or 1999 and who submitted ADF&G logbooks for an active vessel (as received by ADF&G by February 12, 2000)

Option 3. Initial issues who carried clients prior to June 24, 1998 and who submitted at least one ADF&G logbook for an active vessel (as received by ADF&G by February 12, 2000)

Option 4. Initial issues who carried clients four out of five years between 1995-1999 as evidenced by IPHC, CFEC, and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel in 1998 and 1999

Option 5. Initial issues who carried clients four out of five years between 1995-1999 as evidenced by IPHC, CFEC and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel for either 1998 or 1999

PUBLIC REVIEW DRAFT

Option 6. Initial issuees who carried clients three out of five years between 1995-1999 as evidenced by IPHC, CFEC , and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel in 1998 and 1999

Option 7. Initial issuees who carried clients three out of five years between 1995-1999 as evidenced by IPHC, CFEC , and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel in 1998 or 1999

Suboption: Require that initial issuees be currently participating (meeting all legal requirements including filing a logbook) during season prior to final action (currently May- Sept 2000) and claimed trips must have been under the operation of a person holding a U.S. Coast Guard license.

Issue 4. Distribution of QS may be based on:

Option 1. 70% of 1998 and 1999 logbook average with an additional 10% added for each year of operation 1995-97 (longevity reward).

Option 2. Modified Kodiak proposal: 5-30% for A, 33% for B, 37-62% for C

Part A: each individual gets an equal percentage of the qualified pool as identified by the Council's final action.

Part B: each individual's average 98/99 logbook harvest as percentage of overall harvest is multiplied by 33% of the qualified pool.

Part C: one point for each year of participation during 1995-99.

Suboption: Base distribution for the preferred option on both total catch retained and caught and released

Issue 5. Transferability of QS (permanent) and IFQs (on annual basis [leasing])

Option 1. Nature of Charter QS/IFQ:

- a) Leasable
- b) Non-leasable

Suboption: Define leasing as the use of QS/IFQ on vessels on which the owner of the QS/IFQ has less than 20-75% ownership

Option 2. Transfer of QS (permanent) and/or IFQs (leasing):

- a) prohibit transfers between charter and commercial sectors
Suboption: no QS transfers between sectors for 2-5 years
- b) allow transfers between charter and commercial sectors
 1. 1-yr one way transfer from commercial to charter
 2. 3-yr one way transfer from commercial to charter
 3. two-way (between commercial and charter sectors).

Suboptions under Options b (1-3):

- i. Designate QS pool into two classes for transfer from charter to commercial sector: transferable (25%) and non-transferable (75%) pools on an individual's basis
- ii. Cap the percentage of annual IFQ transfers (de facto leasing) between sectors not to exceed 25% of total IFQs and a range of 0-10% of IFQs per year from charter to commercial.

PUBLIC REVIEW DRAFT

- iii. on percentage of annual QS transfers between sectors not to exceed 25% of total QS and a range of between 0-10% of QS per year from charter to commercial.
- iv. A range of 0-10% leasing of Charter IFQ to charter from charter for the first 3 years

Option 3. Block restrictions

- a) any initially issued (i.e., unblocked) charter QS once transferred to commercial sector shall be:
 - 1. blocked
 - 2. blocked up to the limits of the commercial sweep-up and block limits
 - 3. unblocked
- b) allow splitting of commercial blocks to transfer a smaller piece to the charter sector
- c) allow splitting of commercial blocks once transferred to the charter sector

Option 4. Vessel class restrictions

- a) from A, B, C, and/or D commercial vessel category sizes to charter sector
 - 1. Leasable
 - 2. Non-leasable
- b) from charter to commercial:
 - 1. D category only
 - 2. C and D category only
 - 3. B, C, and D category
- c) initial transfer from undesignated charter to a particular commercial vessel category locks in at that commercial category

Option 5. Minimum size of transfer is range of 20-72 fish

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

Option 1. For the charter sector, must be either

- a) a initial charter issuee or
- b) qualified as defined by State of Alaska requirements for registered guides or businesses*
*Suboption: and hold a USCG license.

*this would require a change in the commercial regulations to allow transfer of commercial QS/IFQ to charter operator

- c) fulfill all legal obligations of the charter sector

Option 2. For the commercial sector, must have a commercial transfer eligibility certificate.

Suboption: 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.

Issue 7. Caps

Option 1. No caps - free transferability

Option 2. Caps:

- a) use cap for charter QS owners only of ¼, ½, and 1% of combined QS units in Area 2C and 1/4, ½, and 1% of combined QS units in Area 3A (for all entities, individually and collectively) and grandfather initial issues at their initial allocation

PUBLIC REVIEW DRAFT

- b) use cap for charter QS owners only of ¼, ½, and 1% of combined QS units for combined Areas 2C and 3A (for all entities, individually and collectively) and grandfather initial issues at their initial allocation

Issue 8. Miscellaneous provisions

- Option 1. Maximum line limit of 12 in Area 3A (remains at 6 lines for Area 2C), grandfather initial issues
- Option 2. 10% underage provision of total IFQs
- Option 3. 10% overage provision of IFQs remaining on last trip to be deducted from next year's IFQs
- Option 4. A one-year delay between initial issuance of QS and fishing IFQs.

Issue 9. IFQs associated with the charter quota shares may be issued in:

- Option 1. Pounds
- Option 2. Numbers of fish (based on average weight determined by ADF&G)

Issue 10. Reporting

- Option 1. Require operator to report landings at conclusion of trip
- Option 2. ADF&G logbook
- Option 3. Require a reporting station in every city and charter boat location to accurately weigh every halibut caught.
- Option 4. Charter IFQ fish tags
- Option 5. Require operator to log the catch at the time the fish is retained.

Issue 11. Community set-aside

- Option 1. No community set-aside.
- Option 2. Set-aside ½-2 ½ percent of combined commercial charter TAC for Gulf coastal communities

Suboption 1. Source of the set-aside

- a) equal pounds from the commercial and charter sectors.
- b) proportional amount based on the split between the commercial and charter sectors.
- c) 100 percent of the pounds taken out of the charter sector.

Suboption 2. Sunset provision

- a) no sunset
- b) sunset in 5 years
- c) sunset in 10 years

PUBLIC REVIEW DRAFT

- d) persons currently participating in the set-aside program at the time of sunset would be allowed to operate within the guidelines of the program.

Alternative 3. Moratorium

Issue 1. Issue

Option 1. owner/operator or lessee (the individual who has the license and fills out logbook) of the charter vessel/business that fished during the eligibility period (based on an individual's participation and not the vessel's activity)

Option 2. vessel

Issue 2. Qualification Criteria

Option 1. Initial issues who carried clients in 1998 and 1999 and who submitted ADF&G logbooks for an active vessel (as received by ADF&G by February 12, 2000)

Option 2. Initial issuees who carried clients in 1998 or 1999 and who submitted ADF&G logbooks for an active vessel (as received by ADF&G by February 12, 2000)

Option 3. Initial issuees who carried clients prior to June 24, 1998 and who submitted at least one ADF&G logbook for an active vessel (as received by ADF&G by February 12, 2000)

Option 4. Initial issuees who carried clients four out of five years between 1995-1999 as evidenced by IPHC, CFEC, and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel in 1998 and 1999

Option 5. Initial issuees who carried clients four out of five years between 1995-1999 as evidenced by IPHC, CFEC and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel for either 1998 or 1999

Option 6. Initial issuees who carried clients three out of five years between 1995-1999 as evidenced by IPHC, CFEC, and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel in 1998 and 1999

Option 7. Initial issuees who carried clients three out of five years between 1995-1999 as evidenced by IPHC, CFEC, and ADF&G business and guide documentation for 1995-99 and submitted logbooks for an active vessel in 1998 or 1999

Suboption: Require that initial issuees be currently participating (meeting all legal requirements including filing a logbook) during season prior to final action (currently May- Sept 2000) and claimed trips must have been under the operation of a person holding a U.S. Coast Guard license.

Issue 3. Evidence of participation

- Option 1. mandatory requirements:
- a) IPHC license (for all years)
 - b) CFEC number (for all years)

PUBLIC REVIEW DRAFT

- c) 1998 logbook
- Option 2. supplementary requirements
 - a) Alaska state business license
 - b) sportfish business registration
 - c) insurance for passenger for hire
 - d) ADFG guide registration
 - e) enrollment in drug testing program (CFR 46)

Issue 4. Vessel upgrade

- Option 1. License designation limited to 6-pack, if currently a 6-pack, and inspected vessel owner limited to current inspected certification (held at number of people, not vessel size)
- Option 2.. Allow upgrades in southeast Alaska (certified license can be transferred to similar size vessel)

Issue 5. Transfers

- Option 1. Will be allowed

Issue 6. Duration for review

- Option 1. Tied to the duration of the GHF
- Option 2. 3 years
- Option 3. 5 years (3 years, with option to renew for 2 years)

SUMMARY OF SECTION 2

None of the alternatives under consideration would affect the prosecution of the halibut fisheries in a way not previously considered in consultations. None of the alternatives would affect takes of listed species. Therefore, none of the alternatives are expected to have a significant impact or effect on endangered or threatened species.

SUMMARY OF SECTION 3

Section 3 provides the baseline data from the 2000 IPHC halibut stock assessment and summaries of halibut harvest and participation data by fishery sector and area from ADF&G statewide harvest surveys, guide and business registration, port sampling, creel surveys, and saltwater charter vessel logbook program. These data are used in Sections 4 and 5 to prepare the regulatory impact review and draft initial regulatory flexibility analysis. Lastly, halibut biomass and charter fishery projections are discussed.

Biology and total removals of Pacific halibut in Areas 2C and 3A.

The halibut resource is healthy and total removals are at record levels. The 2000 IPHC stock assessment model continues to show a strong 1987 year-class. No strong year-classes are following, indicating that

PUBLIC REVIEW DRAFT

- c) 1998 logbook
- Option 2. supplementary requirements
 - a) Alaska state business license
 - b) sportfish business registration
 - c) insurance for passenger for hire
 - d) ADFG guide registration
 - e) enrollment in drug testing program (CFR 46)

Issue 4. Vessel upgrade

- Option 1. License designation limited to 6-pack, if currently a 6-pack, and inspected vessel owner limited to current inspected certification (held at number of people, not vessel size)
- Option 2.. Allow upgrades in southeast Alaska (certified license can be transferred to similar size vessel)

Issue 5. Transfers

- Option 1. Will be allowed

Issue 6. Duration for review

- Option 1. Tied to the duration of the GHL
- Option 2. 3 years
- Option 3. 5 years (3 years, with option to renew for 2 years)

**WRITTEN COMMENTS RECEIVED
ON HALIBUT CHARTER IFQ ISSUE**

Halibut Charter IFQ Program
Written Comments for October 2001 Meeting
North Pacific Fishery Management Council

Number in Parentheses indicates placement in comment packet.

Alaska Sportfishing Association (21)
Alaskan Game Fisher (17)
Arctic Tern Charters (4)
Bocci, John (34)
Bondurant, Dale (27)
Bruce, Ed (30)
Christensen, Harland (36)
Cline, Stephen (1)
Cordova District Fishermen United (32)
Crackerjack Sportfishing Charters (18)
Deaver, Richard (10)
Dept. of the Army (6)
Dewey, Roger (13)
Eliason, George (14)
F.V.O.A. (3)
Fairweather Fish, Inc. (31)
Form Letters w/notations (43)
Franzel, James (15)
Hughes, James (38)
Jamison, Vern (19)
Johnson, Don/Phyllis Hernandez (5)
Kirk, George (24)
Magnum Charters (9)
Mayo, Sheryl (25)
Merrigan, Jerry (33)
Nelson, Paul (29)
Nichols, Randy & Carolyn (28)
Petersburg Vessel Owners Assn. (39)
Petition (41)
Petition (42)
Phoenix Marine Co (12)
Rutter, D. (22)
Sam's Guide Service (7)
Schandelmeier, John (35)
Seafood Producers Cooperative (16)
Sitka Charter Boat Operators Association (26)
Sitka's Secrets (37)
Sportsman's Cove Lodge (40)
Studley, James (23)
The Yakutat Fisherman (8)
Van Saun Charters (2)
Walter, Marve (11)
Wood, Charles (20)

Stephen J. Cline
3360 227th St. S.W.
Brier, WA 98036-8032
July 24.2001

RECEIVED

JUL 30 2001

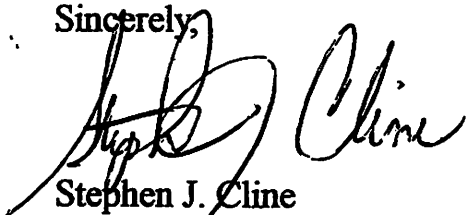
N.P.F.M.C

North Pacific Fishery Management Council
605 West 4th
Suite 306
Anchorage, AK 99501-2252

Dear Council,

I am addressing you with regards to your upcoming meeting in Seattle and the subject of Halibut IFQ's for the sport fisherman. You have already allotted IFQ's to a few chosen Americans and in some cases making instant millionaires, with use of a public resource. Requiring that charter boat operators buy quota is adding insult to injury. The natural resources of this country belong to the people of this country and not a select group. As an American citizen and resident of Washington State I strongly urge you to suspend this action.

Sincerely,


Stephen J. Cline

cc: Washington State Governor Gary Locke

RECEIVED

9-3-01

SEP 10 2001

Mr. David Benton , Chairman
North Pacific Fisheries Management Council
605 W 4th Ave Suite 306
Anchorage, Alaska 99501-2252

N.P.F.M.C

Having been a Halibut Charter Guide in Cook Inlet for the last 10 years I would like to address the attempt by the State of Alaska ie. Toney Knowles, Ken Duffy, and Bob Penney, to bring the Halibut Charter IFQ program up for a revote at the October meeting of the NPFMC.

It is clear to me that Ken Duffy's appointment to the North Pacific Fisheries Management Council was purely a political move by Tony Knowles to support the governor's opposition to the Halibut Charter IFQ program. Mr. Duffy is obviously willing to do Tony's dirty work without regard for the real issues in this challenging time. The fact that Duffy supports a Guideline Harvest Level (GHL) over the IFQ program demonstrates pure ignorance of the effects each program would have on the industry and the sport anglers who use it.

A GHL, also known as a total allowable catch would create a race to the fish. It wouldn't be an issue of how many guides there are, once the GHL was met all sport halibut fisherman would face restrictions varying from smaller bag limits to total shutdown. Basically this would create a race to the fish. The guides who would benefit would be the ones willing to fish any weather at low prices. The people that would suffer would be guides dedicated to being professionals who make prudent decisions regarding weather and have a commitment to summer long availability. The sport fisherman especially the easily entrapped newcomer would also suffer. Out of State Clients and Alaskan residents who want to fish the later part of the summer would very likely be unable to due to closures.

Ken Duffy seems to think he can walk right in and over-ride 10 years of hard work by many individuals to come up with a viable plan. It is unfortunate that he is letting political affiliations taint rational logic. Just think about the benefits that come along with the IFQ plan. It allows for new entrants into the fishery through the purchase of quota. This is not true of the moratoriums that Mr. Duffy refers too. Quotas allow the guided sport catch to float with the abundance of the biomass while not threatening the average private boats. The IFQ program allows guides to fish their people during good tides and weather and be available throughout the summer. It also guarantees a certain level of professionalism versus the fly by night guide that will exist under the GHL. The Deputy Commissioner seems to think he is on the side of sport fishermen where in fact he is undermining their best interest.

It is very unfortunate politics are playing such a strong role in what ultimately should be decisions made based on what is best for the fish. Clearly our Halibut Guide Industry has grown so large something must be done to keep it in check if we are going to guarantee the future of our near shore fisheries. It is my opinion and the opinion of the overwhelming majority of the people I talk to that the Halibut Charter IFQ is the most viable solution.

Tony Knowles should stay out of decisions made by the North Pacific Fisheries Council. He and previous Governors have made appointments to the Council based on the appointee's backgrounds and knowledge of the issues. Then he turns around and back stabs their decisions because they are not popular with a few of his constituents. To Mr. Knowles I say take a step back and let due process take its course.

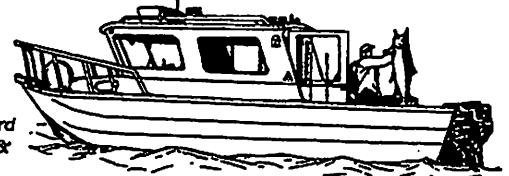
Sincerely,

Captain Rod Van Saun
Van Saun Charters

Van Saun Charters
Deep Creek Salmon & Halibut

P.O. Box 39622
Ninilchik, Alaska 99639
(907) 567-3547 - Home Phone
(907) 398-3179 - Cell
e-mail: vscharters@hotmail.com

Coast Guard
Licensed &
Insured



3

**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

September 4, 2001

RECEIVED
SEP 10 2001
N.P.F.M.C

Mr. Dave Benton, Chairman
North Pacific Fishery Management Council
605 W. 4th Ave., #306
Anchorage, AK 99501-2252

Dear Chairman Benton:

This letter is being sent to you on behalf of the members of the Fishing Vessel Owners' Association regarding the proposed action to rescind the Council's action relative to IFQ charter operations. This is scheduled for action at the October North-Pacific Council meeting. The Fishing Vessel Owners' Association supports the previous action of the Council.

The Council has worked for over seven years through its industry work groups to develop options to resolve the problem of allocation disputes between the commercial and charter industry. The Council heard over 100 people at the public hearing before taking final action. If the Council is going to undue its previous action, the Council has an obligation to the public to present an alternate plan.

Those seeking a reversal of the Council's action owe it to the public to present a workable option that is equal to or better than the one the Council voted affirmatively on. Additionally, those seeking a reversal have a fiduciary responsibility of presenting a time line on implementation and final action of any alternative they may present.

The Council needs to be a body that resolves problems. In our opinion, the IFQ amendment to the current IFQ plan provides a reasonable fair resolution to future allocation battles between the charter industry and commercial industry. If there should be problems with the program, amendments in the future can be made to address those issues just as the commercial IFQ program is amended on occasion to address issues.

The FVOA and its members support the previous action of the Council. If there is a rescinding of the previous Council action, then it falls on those who support a change to present

Mr. Dave Benton
September 4, 2001
2

an alternative that addresses the problem statement as well as or better than the existing Council recommendation to the Secretary. The Council needs to be a body that resolves problems, not an organization that perpetuates contentious issues. The Council took action once. It should move onto the next issue.

Sincerely,



Robert D. Alverson
Manager

RDA:cb

cc: Washington Congressional Delegation
Alaska Congressional Delegation



ARCTIC TERN CHARTERS & FISH CAMP

Captain Perry A. Flotre, Professional Sportfishing Guide

7 September 2001

RECEIVED

SEP 10 2001

North Pacific Fishery Management Council
605 W. 4th Avenue, #306
Anchorage, AK 99501

Dear Mr. Chairman and Council Members,

N.P.F.M.C

My name is Perry Flotre. I own and operate a sport charter fishing business in South Central Alaska. Some 65% of our business is dependent upon Alaska's visitor vacationing clients and the rest are local Alaskans. I strongly urge you **NOT** to support the State of Alaska's proposal to revisit the Council's April 2001 overwhelming 8 to 3 vote for adoption of the Halibut Charter IFQ Program.

The State of Alaska's alternative of regressing back to the GHL and trying to sweeten it with the addition of a moratorium (after the GHL is exceeded) is without merit. The Charter IFQ Program as adopted by the Council is proactive and will prevent the constant reallocation battles between the Commercial/Charter Sectors and also provide both sectors the ability to adjust during periods of decline or increase in stocks. The State of Alaska's position is reactive, i.e., it waits until the problem has already occurred and then attempts to orchestrate a fix. In the interim the Charter sector will face the loss of long established clientele bases and the accompanying financial losses, a real hit when you consider the fleet is over-capitalized and running a 35% annual turnover rate.

I suppose I am preaching to the choir since most of you have been involved in this process for sometime, attending numerous meetings, listening to hours of committee reports and public testimony. The Council is to be congratulated on the development of such a thorough analysis for a final decision on the Charter IFQ Program in April 2001.

I would encourage you to remember the following when making your decision to revisit this issue. *The rational for supporting the Charter IFQ Program has not changed since Apr of 2001:*

The Charter IFQ Program WILL end the annual allocation battles between the Commercial/Charter sectors.


The Charter IFQ Program WILL allow the Charter sector to offer the opportunity to guided anglers to continue seasonal bag limits as determined by the IPHC/NPFMC. With the current IPHC prediction of a 5-year plus decline in the total allowable catch (TAC), the Charter IFQ Program WILL allow transfer of quota between the Commercial/Charter sectors with no impact on the overall TAC.

The Charter IFQ Program WILL allow continuous open entry into the Charter sector without impacting the overall TAC.

The Charter IFQ Program WILL NOT impact the unguided sport, personal use, or subsistence anglers as their catch will continue to be allocated at 100% and taken off the top prior to issuance of the IFQ TAC.

If you have any questions about what I have said, please contact me by phone at 907-262-7631 or email at arctictern@alaska.com. In closing, I urge you to reaffirm your previous (Apr 01) overwhelming vote to adopt the Halibut Charter IFQ Program. Thank you for your time and attention.

Sincerely,



Perry Flotre

Subject: Re: Alaska's near shore halibut depletion problems and the NPFMC.

5

Date: Mon, 10 Sep 2001 15:32:56 -0800

From: "Don Johnson" <ccpwow@gci.net>

To: <Chris.Oliver@noaa.gov>, <devans@doc.gov>

The Honorable Donald L. Evans
Secretary of Commerce
U.S. Department of commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230
devans@doc.gov

North Pacific Fishery Management Council, NPFMC,
605 W. 4th Avenue, #306,
Anchorage, AK 99501

RECEIVED

SEP 12 2001

N.P.F.M.C
by Mail

Dear Mr. Secretary and North Pacific Fishery Management Council members

I wish to address the Charter Halibut IFQ issue.
I do not agree with your current "limited entry IFQ solution" for the
stabilization
of the Halibut resource. I do however agree with Kevin Duffy request to
rescind
the April vote that approved the IFQ plan.

I believe the IFQ question should be again opened up for public testimony,
especially within Alaska where your "limited entry IFQ solution" is
completely illegal.
In the mean time the Council could manage by falling back on the GHL.
This is a tremendously divisive issue with fall-out resulting for many years
into the future.
The Halibut problem did not develop over night and should not be given a
half thought-out
solution. The IFQ solution is such a half thought-out solution.
I believe the Council should reconsidered this issue because I do not believe
it has fully
considered how its IFQ solution will conflict with Alaska's Constitution.
Alaska's Constitution will not allow its people to fully participate in this new
fishery like
other areas. Alaska's Attorney General has already found that Alaska will not
be able to
draft similar IFQ regulations because they would violate its Constitution. It is
completely
possible that Alaska will not recognize your current IFQ solution and instead
draft regulations
to counter act it for its residents.

Many of us Alaskan's have a philosophical problem with giving fishing quota
to "a fishing platform", meaning a charter boat, rather than a harvester.
We have good reason for hesitating on this important issue because this IFQ
action
would set a new precedent with regard to granting fishing quota. Fish quota
has always
in the past only been granted to commercial harvesters which squares with
Alaska's
Constitution. The NPFMC ill-advised attempt to jump from "harvester" to

"platform" is a move which the Council should reconsider. There is a strategic difference between the two groups. "Harvester" is a gear issue and "platform" is a people issue. Make no mistake about it, the charter IFQ change attempts to manipulate the people accessing the entire halibut resource. With this decision the NPFMC attempts to move from managing "tools" to managing the "people". Alaska's Constitution specifically bans the management of similarly situated people within common use fisheries and specifically allows the management of tools or gear type. As far as Alaska is concerned, IFQ's for commercial fishing legally manages a tool but IFQ's for charter boats attempt to illegally manage similarly situated people within a common use fishery.

The North Pacific Fishery Management Council must consider the Alaskan regulatory response to their charter IFQ decision. This major decision should have been more fully considered before any final decision was made. As far as I know the local legal response was not even considered. There will be an Alaskan regulatory response, it is just a matter of what it will be.

Examples could be as bizarre as a total Alaskan ban on Halibut charter operations because Alaska cannot legally allow limited entry for only some of its residents.

The Council will not be able to control the response from the Alaskan Courts or Legislature.

It is illogical for any management authority to draft dramatic regulatory changes without fully considering how those changes will be received by the local users of the resource.

The North Pacific Fishery Management Council is operating as if its International decision need not consider the local legal turmoil it creates.

I suggest you rescind the charter IFQ "now" before you wish you had.

Thank you for your consideration of this important matter.

Don Johnson
ccpwow@sci.net
PO box 876
Soldotna, Alaska 99669
907 262 7893

~~Don Johnson~~ Phyllis HERNANDEZ
ccpwow@sci.net
PO Box 5274
Soldotna, Alaska 99669
907 262 7893

Phyllis Hernandez



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY GARRISON ALASKA
600 RICHARDSON DRIVE # 5000
FORT RICHARDSON, ALASKA 99505-5000



REPLY TO
ATTENTION OF:

APVR-GC

RECEIVED

10 AUG 2001

AUG 20 2001

N.P.F.M.C

Mr. David Benton, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Dear Mr. Benton,

I am writing to you in response to address some concerns that I have pertaining to the impact to the Army as a result of the North Pacific Fishery Management Council's vote to approve an IFQ program for halibut charter operators in Southeast and Southcentral Alaska.

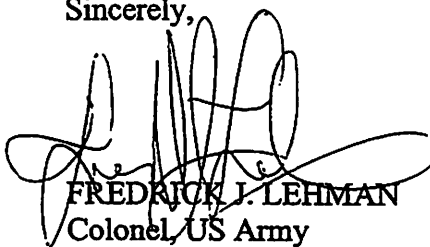
As you are probably aware, the U.S. Army operates the Seward Army Resort, a recreational facility primarily for active duty and retired service members and their families, in Seward, Alaska. The Seward Army Resort is operated under the Army's Morale, Welfare, and Recreation (MWR) system and is substantially funded through revenues generated at the Resort, not through congressionally appropriated, taxpayer dollars. Seward Army Resort does not operate for the purpose of making a profit, as a commercial enterprise would do, but rather to essentially break even and be able to stay financially operational. Thus, income generated by the lodging and fishing operations at the Seward Army Resort are put back into the Resort or into other MWR programs within the Army's MWR system.

Among the other recreational opportunities offered at the Seward Army Resort is the opportunity for patrons to go out on charter fishing boats operated by the Army. Currently the Army operates five, charter fishing boats. However, not all of these boats were owned and operated by the Army during the 1995-1999 time period, which it is my understanding is the time period that will be used in determining a charter operator's future quota share under the IFQ program. Obviously this is of concern to me as I am uncertain how quota shares will be determined for these additional boats which the Army now has, but for which we have no fish harvest records for during the 1995-1999 seasons. In addition, of the boats that the Army did own and operate during the 1995-1999 fishing seasons, not all of these boats were operated by Coast Guard licensed boat captains because the boats were not operated for a fee, but rather on a free lottery system to patrons of the Seward Army Resort. As a result, over half of the harvest records, which were maintained and turned in to the Alaska Department of Fish and Game, were considered "unrecorded." This too is of concern to me as it is my understanding that the "recorded" harvest numbers are what will be used in allocating quota shares under the IFQ program. Finally, of concern also is the fact that during the first half of the 1999 season, the Seward Army Resort restructured its marine operations and did not become fully operational until mid-summer. As a result of missing half the season, our halibut harvest logbooks reflects considerably lower season totals.

For the above reasons, which I believe are unique to the Army and not applicable to the typical charter operator, I request consideration be given to exempting the Army from the IFQ program. Alternatively, I request that all of the Army's halibut harvest totals, "recorded" and "unrecorded", be counted for purposes of determining the Army's quota shares. In addition, request allowance be given when determining quota shares for the additional boats the Army now operates as compared to the number operated during the 1995-1999 seasons.

I would welcome the opportunity for members of my staff to meet with members of the North Pacific Fishery Management Council in order to discuss these issues and concerns in greater detail. Please do not hesitate to contact me at 384-2175 or Mr. John Curry, Director of Community Activities, at 384-2261 if you have any questions or wish to discuss these issues further. I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fred J. Lehman', written over a typed name and title.

FREDRICK J. LEHMAN
Colonel, US Army
Garrison Commander

PO Box 23
Tenakee Springs, AK 99841

7
RECEIVED

AUG 29 2001

August 27, 2001

Chairman David Benton
North Pacific Fisheries Council
605 W. 4th Ave. Suite 306
Anchorage, AK 99501

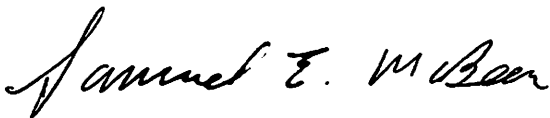
N.P.F.M.C

Dear Mr. Benton and Council Members:

I am writing to express my support for the proposed Halibut IFQ system as it know stands and without any significant modifications. I understand that Governor Knowles, among others, is opposed to the plan but I firmly believe that this action is both necessary and long overdue.

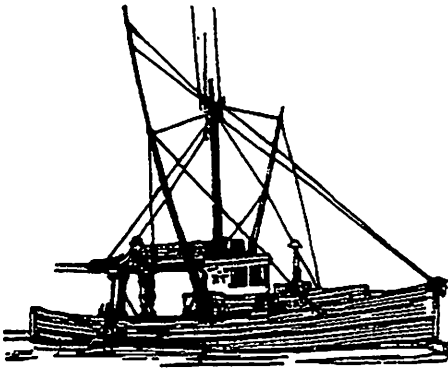
I have been involved in many commercial fisheries and in the sport charter business over the last 25 years. During that time it has been obvious to me that, though it is not perfect, the limited entry system is something that has worked. The Halibut and Black Cod IFQ system also appears to be working as well. The biggest mistake I have seen in implementing limited access to any of the various fisheries in the past has been in waiting to long to do so. In past instances when limited entry has been delayed to long, it has created a condition that is good for neither the resource or the participants and then that situation was locked in place. For that reason it is imperative to act now to implement the IFQ system in order to get control of the exploding Halibut charter fleet before it jeopardizes the Halibut resource and compromises its own existence.

Sincerely,



Samuel E. McBeen

cc: Governor Tony Knowles



The Yakutat Fisherman

Direct Seafood Sales

Business Address:

P.O. Box 454

Yakutat, Alaska 99689

Phone:

(907) 784-3956 Alaska

(941) 647-1249 Florida

State of Alaska licensed and

D.E.C. Approved

FP 2009

RECEIVED
SEP 17 2001
N.P.F.M.C.

Mr. David Benton:

I am a commercial fisherman who fishes salmon and halibut with only 7,000 lbs of halibut IFQ's.

Once I was concerned over the growing impacts of charter boat fishing and was in favor of a charter IFQ program.

Now I'm considering joining the charter boat business. As I see ~~that~~ continual growth here in Yakutat in the charter boat business, I feel that grandfathering those few charter boat operators is too early in the build up of this industry in Yakutat.

I do feel there should be a guideline harvest level for sport fishing but not a give away for a resource that is not needed to reduce the size of the fleet in small communities such as Yakutat.

Give us the opportunity to join in the sports fishing industry where there is a underdeveloped charter boat fleet.

Thanks,
Jim Wilson

Magnum Charters

P.O. Box 2423 Kodiak, Alaska 99615
1-888-330-7600 toll free
(907) 486-7600 ph/fax
e-mail magnum@ptialaska.net
www.magnumcharters.com

North Pacific Fishery Management Council
605 W. 4th Ave. #306
Anchorage, AK 99501

9
RECEIVED

SEP 3 7 2001

N.P.F.M.C

Dear Council Members,

I am in total disagreement with your decision in April concerning IFQ's for charter operators. As you are all aware, your decision is in total conflict with Alaska State constitution. I feel you have not taken into consideration all of the ramifications and problems your April vote has and will cause should the Secretary of Commerce approve it. As a charter operator, I myself do not harvest any halibut for profit. I merely provide a sport fishing platform by which a legally licensed person can exercise their right to sport fish for halibut. Alaska State law prohibits the selling, trading, or bartering of sport caught fish. Does your decision mean that my clients can harvest halibut in federal waters and sell them to offset the cost of their sport fishing trip? Do we charge more for bigger fish to compensate for those clients that will most likely cancel their fishing trip because I had to tell them that it will be catch and release only fishing for halibut. This is an unworkable and unreasonable plan. Halibut are a public use resource and should remain that way.

I request you reconsider and rescind your April vote on charter IFQ's and allow for more public testimony during you October, 2001 meetings.

Thank You,



Gary Salter
Magnum Charters

Richard Deaver

RECEIVED 10

From: "Richard Deaver" <ramrod@rushmore.com>
To: "Don Johnson" <ccpwow@gci.net>
Sent: Thursday, September 06, 2001 8:37 PM
Subject: Re: *** Sport Fish Alert *** IFQ - NPFMC meeting October 1 - Don Johnson and others,

SEP 17 2001

N.P.F.M.C

by mail

Don, I appreciate your work in regard to the Halibut IFQ baloney going on in Alaska. I have been a guide and commercial fisherman in Southeast Alaska for nearly 20 years and have watched as the commercial interests have been allowed to take control of the halibut fishery. If not placed in check they will destroy it much like the East Coast fishery was decimated. Some food for thought besides the IFQ proposal for charter fishermen.

It won't really matter what the IFQ allocation is in the future since it has become a joke trying to catch a sport caught halibut in much of Alaska. Commercial fishermen have all summer now to fill their allocation; so, they have concentrated on areas close in to many coastal towns and virtually wiped out most bottom fishing. You see, with the IFQ most commercial fishermen work under, they have eliminated hiring a crew and fish continually by themselves in areas close to home. This saves time and expense. It also leaves no fish for the sport industry within miles of most villages and towns. Ask any local sportfisherman if the fishing is any good and they will tell you. It is virtually non existant. Oh yeah, you might catch an occasional sub 31 incher since they are not of legal size and are discarded. Some I have caught have been discarded tagging along a commercial hook and line someone didn't take time to remove.

The bottom fish populations besides halibut are gone too. I have gone months without catching a rockfish or cod. In the days before the IFQ's it was common to find these fish daily. No more... they are either kept as bicatch or used as bait for the next set.

3. The sport industry has been blamed in many areas for taking all the fish. Funny though....I have seen commercial sets of 10 to 20 skates of gear laid out by a single longliner. (a skate is around one mile long and has a hook every 6 to 10 feet) Imagine, 10,000 to 20,000 hooks per set! And to think that we're being blamed for taking all the fish. There are no limits on the number of hooks a longliner can run irregardless of his allocation. The other rub is that a careless or slob commercial fisherman can leave his catch on the ocean floor too long only to have it eaten by sea worms and scavengers. No problem, just reset the gear and do it over. If you think that it doesn't happen think again. I have seen it happen. One longliner took a couple days to hunt deer, got a little drunk forgot to run his gear. He just returned to town and bragged about his error in the bar, got bait and returned to reset his gear.

I am tired of being blamed for the waste in this industry. I am also tired of seeing the fishery being devistated by overfishing and poor management. It would make a lot more sense to manage the groundfish fishery based on limits and a method of rotating the pressure. For too long the industry has been managed for the sake of commercial interests with little regard for the sport fisherman and the individual who would just like to have a halibut for dinner.

I do not support the IFQ program for sportfishermen because I know it does not address the real problem. The real problem is managment of the fishery on a local basis and with an eye toward the other bottom fish that have been lost to bicatch. A real effort to restructure the fishery better happen soon or it won't matter anymore. I have seen a serious decline and expect to see a total collapse within the next 3 to 5 years. It has already happened in Southeast during the summer months and if not put in check it will become statewide.

Managing all bottom fish not just halibut is the only answer. Forget the IFQ for sport caught fish, look at the longline industry and its managment.

Feel free to pass on my comments to anyone that will listen.

Rich Deaver

9/6/01

Marv Walter
Anytime Charters "C/V Sandra Rae
1340 Fritz Cove Road
Juneau, Alaska 99801

RECEIVED
SEP 17 2001

N.P.F.M.C

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

9/10/01

Dear Mr. Benton,

I am a charter boat operation out of Juneau, Alaska and I hold commercial IFQ shares. I've lived in Juneau for the past 22 years and I've chartered for the past 9 seasons. During that time I've watched the Halibut issue take form and grow into the present situation. I've viewed the issue from both sides. Here is how I see things in the Juneau area and much of Southeast Alaska:


- 1) During the past couple years the Halibut fishery for sport fishing, including charter fishing has become a very difficult challenge. Participants find small and few fish during the fishing season. My charters have taken mostly small fish and the numbers have been low. I've traveled further and tried harder this past year, then ever before. I've even turned down many all day Halibut trips because of the poor success rate. Brokers have discontinued booking all day charters off the ocean liners, because of the poor success rate. This is an economic issue for all concerned parties.
- 2) I've had to fish the deeper waters for Halibut. My reels now have small diameter Power Pro line, which allows for deep water fishing. I now have to fish in water over 400 to 600 feet deep. My reels are now in poor repair and in need of attention. Sport fishing should not have to fish those depths in order to catch Halibut. Trying to anchor is difficult. I had to replace my anchor wench 1000W electric motor as it burned the brushes out trying to anchor in deep water. Additional expenses!
- 3) I am worried about the future Halibut fisheries in SE Alaska as this situation continues. Something needs to be done. I feel the commercial interest must have limitations placed on them: In the Juneau area Long liners need to have closures and corridors established. Commercial fishing needs to move to the outside waters. At the present time Icy Straights, Chatham Straight, Lynn Canal, and Stephen Passage are being fished by IFQ long liners all season. The Halibut are being caught and are not being allowed to reach their traditional areas of residences. If this continues we'll see a major change in the over all population of Halibut in SE Alaska. Sport fishing can't compete with Long Liner gear. The Sport fishing population needs to be considered and things need to change before it becomes an even worse situation in SE Alaska.

4) On topic of Charter boat IFQ's. I know this... **If I have only a set number of IFQ fish available to fish.... I will not allow small fish to be kept on my boat. The price of my Halibut trips will increase.** In the present situation many of my clients will not catch even the 2 per day limit on an all day trip. The fish population just isn't there anymore in the Juneau area. It is a sad situation for most, if not all charter boat Halibut users. **Most charter boats in the Juneau area will not consider even taking a Halibut trip. It's expensive and the catch results are poor!**

Summary: I feel the problem doesn't rest with the charter industry or the sport fishing users groups. The problem rests with the Long line IFQ commercial interest! Changes need to be made soon. Changes that are not political, but practical, and based upon the reality of the situation.

I realize the commercial interest wants charter boat IFQ in place and they want all the gravy available to them. Tradition they say is on their side and they need to make a living fishing for Halibut in Alaska waters. It is time to make some changes before we are faced with a sport fishing Halibut industry which is at best poor!

Sincerely,


Marv Walter
IFQ commercial share holder
Experienced charter boat operator

PHOENIX MARINE COMPANY, INC.

P.O. Box 020670
Juneau, Alaska 99802

September 18, 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, unprecedented agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The State has presented no compelling information why the program should be rescinded. The Governor's personal political ambitions should not override rational management.

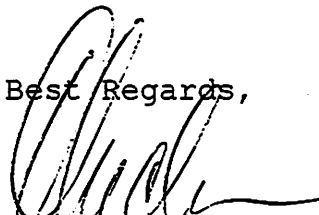
My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries. This does nobody any good.

Charter IFQs are needed to rationalize the entire industry, longline and charter. Charter IFQs are a long-term market based solution that will allow fisheries managers to focus their efforts

on improving management of the resource, rather than waste precious funds getting involved in allocation disputes. IFQ's have worked very well for traditional commercial fishers, and will work very well for commercial charter boat operators. The fact that the Governor's buddies have not got their share of the action yet is no reason to fail to implement a truly good solution.

Your consideration of this letter is appreciated. Sustainable commercial fishing provides many jobs in our local communities and benefits the State in many positive ways. Businesses need certainty, and the Charter boat IFQ program provides that certainty to both classes of commercial enterprises.

Best Regards,



Chuck Cohen
F/V LADY BARBARA

CC: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

13

Re: Halibut Allocation
Copies: Gov. Tommy Knowles
465-3532
Chairman of N.P.F.M.C.
271-2857

Dear Sirs,

I was recently informed about a bill to rescind a bill to make Charter Boats also I.F.Q.

I THINK EVERYONE INVOLVED IN FISHING SHOULD BE UNDER I.F.Q.'S OR, ~~PETER~~ PETER YET, ~~PERMITS~~

CANCEL THE ENTIRE I.F.Q. system! As fisherman, we all pay a very big investment in our fisheries, permits or I.F.Q.'S

Other users, namely charter fishing boats using the same resources do NOT make a large payment plan or cash out of pocket to use the SAME RESOURCE!

DOES THIS SEEM RIGHT? NO.

My feeling on the charter boat operators are equally as strong for Salmon charter boats.

WHERE IS THE CHARTER BOATS INVESTMENT IN THE SAME RESOURCE I PAID \$148,000. to have the privilege to use.

Respectfully,

ROGER DEWEY,
Alaskan fisherman
for Salmon, Halibut,
Crab, Cod, Tax payer
and getting "poorer" for
it.

RECEIVED

SEP 18 2001

N.P.F.M.C

14

RECEIVED

SEP 18 2001

N.P.F.M.C

September 17, 2001

Mr David Benton
Chairman
North Pacific Management Council
605 West Forth Avenue, Ste. 306
Anchorage AK 99501-2252

Dear Mr. Benton,

I have been a life long resident of Sitka, Alaska and a commercial halibut fisherman for over 35 years. I grew up fishing halibut on my fathers' vessel and my sons and daughter are now doing the same on mine. I received shares of halibut IFQ's during the initial allocation and since that time have purchased additional shares. My two sons also hold small amounts of halibut IFQ that they have purchased. 50% of our yearly income is from fishing halibut. Needless to say, our family has a large stake in the halibut fishery. We are very much looking forward to the day when we can be assured that the shares of halibut IFQ's we have are not being allocated away from us to another user group.

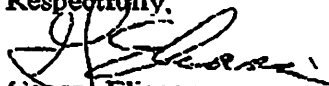
I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition

Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Thank you for your consideration.

Respectfully,



George Eliason
F/V Tammy Lin

Cc: Governor Tony Knowles

RECEIVED

SEP 19 2001

N.P.F.M.CSeptember 19, 2001
Mr. James Franzel
8601 Battailles Ct.
Annandale, VA 22003North Pacific Fisheries Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I remained firmly opposed to the charter IFQ concept that the NPFMC is attempting to advance to the Secretary of Commerce and urge the Council to rescind this program for the following reasons:

- 1) The NPFMC has not demonstrated that there is a "problem" with the halibut charter industry in Alaska. The guided sport harvest hasn't grown in the last 5 years (while the commercial longline harvest has almost doubled from 37 million pounds to over 60 million pounds) and only harvests 5% of the overall catch in the North Pacific. The "overcapitalization" concern isn't supported by any analysis or data. There is no compelling reason to do anything. You do not meet the Magnusen Act standards for implementing an IFQ program.
- 2) The IFQ program essentially gives the public's access to their resource to the charter industry. If the program were implemented, the public would have to pay the charter operator a de facto access fee to go fishing because they would no longer have free access. This is because a charter operator that has to buy IFQ to start or expand his business will have to pass this capital cost on to the consumer (sport fisherman).
- 3) This sport IFQ program is a new IFQ program and presently, Congress has imposed a moratorium on new IFQ programs. To claim that it is an extension of the existing 1995 commercial longline program is absurd. The 1995 program was a "fishing privilege" for commercial fisherman. This sport IFQ program is not a "fishing privilege" because charter boat owners don't catch fish. It is an access privilege - a totally different concept and user group.

Please vote against charter IFQ's - they are clearly unnecessary and not in the public interest. I remind you to follow your oath of office - "to protect and safeguard the public interest". Thank you.

Sincerely,



James S. Franzel



SEAFOOD PRODUCERS COOPERATIVE

16

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS
2875 ROEDER AVENUE, BELLINGHAM, WA 98225
PHONE (360) 733-0128 FAX (360) 733-0513

RECEIVED
SEP 20 2001
N.P.F.M.C

TO: David Benton, Chairman

COMPANY: North Pacific Fisheries Management Council

FROM: Barry S. Lester, President/CEO *[Signature]*

DATE: September 19, 2001

SUBJECT: Charter IFQ Program

No. of Pages Including This Cover Sheet: 1

The 509 members of Seafood Producers Cooperative strongly oppose any attempt by the Alaska Department of Fish & Game and the Governors office to rescind the IFQ charter program passed by the Council at the April 2001 meeting.

This issue was thoroughly discussed and studied by the Council prior to the April 2001 meeting. There are no new facts or data that have surfaced since that time that would warrant rescinding the decision for any reason.

Lets not let politics stand in the way of the Councils decision making process or the good management of our fisheries.

Thank you.

PC: Governor Knowles

Alaskan Game Fisher

P.O. Box 1127 • Soldotna, AK 99669 • email: akpt@alaska.net • (907) 262-2980 • Fax (907) 260-2676 • 1-800-320-2980



To: NPFMC
605 W. 4th Ave #306
Anchorage AK 99501

RECEIVED

SEP 20 2001

Subject : Halibut Charter IFQ

N.P.F.M.C

Dear Chairman Benton & Council Members

Please uphold the April decision by the council to implement an IFQ program for the Charter boat industry. We have been facing this issue for several years, with 2 analysis and heavy public input, in April it was an overwhelming majority of public input in favor of IFQ's. This will solve the conflict between commercial & guided sport fisheries, will stabilize & bring professionalism to the charter industry. The GHL will not work & will devastate an already weak charter industry. The Guided angler will be better served & protected under an IFQ. Please do not let politics & the State's position get in the way of what the charter industry knows what is best for it and what the commercial industry wants also.

This is one of the only Issues that both the Commercial & guided sport users have ever agreed on so don't screw it up & give in to state pressure, do what the governor appointed you to do & not what he wants you to do.

Captain Mel Erickson
Alaskan Gamefisher
Po Box 1127
Soldotna AK 99669

RECEIVED

SEP 20 2001

N.P.F.M.C

Crackerjack Sportfishing Charters
Captain Andy Mezirow
PO Box 2794
Seward, Alaska 99664

18

September 17, 2001

North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Dear Chairmen Benton and Council Members,

I am an Alaskan charterboat owner/operator from Seward. I am once again writing to you, this time to ask you NOT to rescind the charterboat IFQ plan. The NPFMC staff has completed the lengthy process of analyzing the problem. You have crafted a reasonable solution in the charter IFQ plan. There has been more than ample opportunity for public comment. Any charterboat operator who claims they were unaware of possible exclusion from the fishery simply did not do their homework before investing.

There have been compromises made by all involved to insure the plan would be fair to the charter operators as well as commercial fishermen.

No good will come from rescinding this recommendation.

The State has not presented a reasonable alternative. They have had 8 years to find a solution to the problem statement and have still failed to do this. The LAMP process has been stalled for years. They only managed to present a poorly planned alternative at the last meeting instead of introducing it months before so that it could be analyzed.

Rescinding the IFQ plan will just cause years of delays and conflict between users. It is my understanding that according to preliminary data the charter industry has already reached the GHF in 2001.

I have been making time to attend these meetings for years and am looking forward to some resolution. Please do not spend more time and effort on this allocation issue. The IFQ plan solves the problem.

Thank you for your time and keep up the good work


Andy Mezirow

Owner, Crackerjack Sportfishing Charters

I hope you will continue to support the Halibut charter IFA program. I earned my IFA's the hard way. The small number of pounds I received was the culmination of two & three days of mechanical fishing over a period of several years. I made a decision about two years ago to purchase more IFAs. I borrowed from NMFS against my boat. The purchase of IFAs has helped keep our family fishing business afloat, since the salmon fishery went belly up. Rescinding the charter IFA program would further put our family fishing business in jeopardy. IFAs for the commercial charter fleet will give me some assurance of a continued future in commercial fishing. Charter quota is necessary in order to stop the ongoing allocation disputes between our fishery and theirs. There needs to be stability in both industries. Please continue to support the need for a charter IFA system.

Sincerely,
L. E. Benton

Vern E. Jamison
1527 West 874 St
McMinnville, OR 97128

RECEIVED

SEP 2 6 2001

NPFMC

9-28-01

Dear Mr Benton

20

20 September 2001

RECEIVED

SEP 24 2001

VIA FACSIMILE - 907-271-2817

N.P.F.M.C

Mr. David Benton, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Dear Mr. Benton:

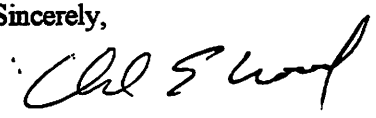
I have fished halibut commercially in Southeast Alaska's Area 2C since 1982. It is almost unbelievable that part of the halibut industry is strictly managed, while another part has virtually no restrictions, and is encouraged to expand at the expense of the other.

At the inception of Alaska's IFQ program, I personally lost 91% of my total production of each of the prior two years. However, I have since recovered most of my halibut poundage through various financial institutions, including a National Marine Fisheries loan.

I am amazed at those who complain at receiving 25% more than what they have ever produced before. Under an IFQ program, they could expand even more if they so chose. I can see no way that clientele of charter operators could suffer under an IFQ program. Charter operators would be able to provide a valuable resource and experience to their clientele, in a responsible way.

Thank you for your consideration of this testimony.

Sincerely,



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

fc: Governor Tony Knowles

21



Alaska Sportfishing Association

P. O. Box 24-1847

Anchorage, AK 99524-1847

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

RECEIVED

SEP 21 2001

Dear Chairman Benton and Council Members:

N.P.F.M.C

Thank you for the opportunity to address the most serious issue facing the Pacific Northwest's sport fishermen today. We are referring to **the Alaska Halibut Charter IFQ program**. **We urge you to vote to rescind the implementation of this program.**

Why do we say that this issue affects sport fishers from the Pacific Northwest and not just Alaska? As you know, sport fishers from all around the world utilize Alaska's fisheries with the vast majority of anglers coming from Alaska, Washington, and Oregon.

All of our previous testimony for the past eight years on this issue still applies and should be referenced in your decision process. We must once again make you aware that not one sport fishing or advocacy group has supported the IFQ program. We also want to let you know that we have been hearing from more and more disenchanted users and we expect that trend to continue and to increase as word of their action reaches more of us. In fact, we recently met with a group of concerned charter boat captains from Homer who oppose the imposition of the IFQ program even though they would benefit financially.

There is general agreement that the implementation of the Halibut Charter IFQ program would result in significant impacts to the accessibility and affordability for the sport-fishing customer. The expectation is that there would be a narrowing of choices from which charter boat a potential customer will be able to choose. We expect that the charter boat operator will also post a higher price, as he/she must recoup the additional costs of purchasing halibut IFQ for their business.

We sport fishers have been subjected to increased regulations for many years. Most of the regulations, imposed by State regulators, are implemented because of conservation concerns for a particular species. Should that have been the primary reason for halibut IFQ, we would have "sucked in our gut" and once again bore the burden of conservation. But this Charter IFQ program is not about conservation; it's about taking away from the American public a publicly owned resource... halibut. We sport fishers will be losing our freedom and ability to hire a boat driver and harvest fish for our dinner tables at a reasonable cost.

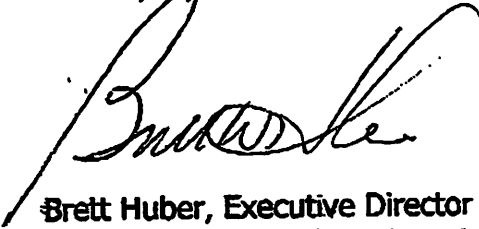
We are also concerned that the Halibut Charter IFQ program would place a significant burden on the operator who wants to enter the business. The potential operator would have to finance the procurement of IFQ's in addition to the costs of boat, gear, licenses, etc. This will limit the entry of new operators. New blood is important in every business as the new entrants bring new ideas, enthusiasm, and an option for the customer to get away from the burned out operator who is just going through the motions.

We strongly feel that the sport halibut fisheries need to be managed in discreet geographic areas because the areas of concern are local in flavor and not regional. We are confident that the Local Area Management Plan (LAMP) concept is the best way forward.

We are writing this joint testimony, as our organizations are the largest and most active groups advocating for the sportfishing public in Alaska.

Again, We urge you to vote to rescind the implementation of the Halibut Charter IFQ program.

Thank you,



Brett Huber, Executive Director
Kenai River Sportfishing Association and
Vice President and Chair of the Fisheries
Committee - Alaska Outdoor Council



Phil Cutler, President
Alaska Sportfishing Association

9/14/0122

NPMC

Having borrowed more than \$150,000⁰⁰ from State of AK Div. of Investments to purchase halibut quota shares, I am shocked to see the governor's actions through Kevin Duffy and Bob Penney. I'd like to know of Bob Penney:

1. how many fresh, and saltwater vessels your lodge on the Kenai deploys
2. How many set/drift gillnet fishers your firm might presently displace?
3. How many set/drift gillnet fishers ^{should} ~~might~~ your firm ultimately displace?

I believe the council is on track limiting quota shares to individuals. The deployment of large numbers of vessels poses the biggest threat to traditional users. One man owning 18 or 24 charter vessels is something very much akin

to the situation this state lead
under fish-traps and seine based
imperialism.

Guiding is commercial fishing in every
sense of the word. The states part
with respect to charter boat IFD
is nothing short of criminal. As
if by not recognizing the commerce,
the state courts/legislature might
justify through semantics the slow
genocide they inflict against
commercial and subsistence fishermen.
Guides are more similarly situated with
commercial fishers, than regulations
and ~~traps~~ The Council is right on
track in their recognition of guides
as commercial harvestors.

Sincerely,
Sgt. D. R. [Signature]
Box 124 Fort Meade
MD 207-568-2292
Capt. Governor Knowles

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave.
Anchorage, Alaska 99501

RECEIVED
SEP 21 2001
NPFMC

Sept. 4, 2001

Dear Mr. Benton;

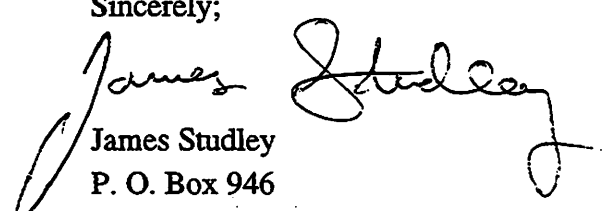
Please allow the continuance towards adoption of the halibut charter IFQ program recommended in 5/2001 and make sure that any motion to rescind this program not be approved.

Additionally I believe the sports charter boats should have the same size fishing restrictions as the commercial fleet and that all fish under 33 inches be thrown back and returned to the sea for future harvest.

I am not so convinced that we in the halibut fishing industry should keep any of the large females either. I do not think the Council's recommendation for the fleet was broad enough, we should consider throwing back all halibut over 60 inches in length as well.

But if nothing else keep the IFQ Sports Charter recommendation by the Council. Thank you for your time.

Sincerely;


James Studley
P. O. Box 946
Haines, Alaska 99827



9/24/01

10:08 AM

1/1

RECEIVED

24

SEP 24 2001

9-24-01

N.P.F.M.C

Dear Mr. Benton and Mr. Knowles,

I am a commercial halibut fisherman from Kodiak, I also fish Bristol Bay salmon and Kodiak herring.

Halibut is becoming more and more important to me and my family, and the whole community of Kodiak as salmon and herring become less productive (more like nonexistent).

I urge you to vote against rescinding the area 2C/3A IFQ program that was adopted in April 2001 by the NPFMC. I and this whole community need your continued support for a charter IFQ program. We have been working since 1993 for a charter IFQ program, and came to agreement on IFQ's, any effort to rescind now without any new evidence or reason is pure politics and a waste of a lot of hard work and time.

I have invested literally everything I have in halibut IFQ's. We need charter IFQ's to bring stability in the halibut fishery for both the charter and commercial sectors.

Thank you,

George Kirk
P.O.B. 2796
Kodiak, Ak. 99615

25

9/22/02

Mr. David Benton, Chairman
North Pacific Management Council
605 West 4th Ave. Suite 306
Anchorage, AK 99501-2252

RECEIVED
SEP 24 2001
N.P.F.M.C

Dear Mr. Benton and Council Members,

I urge you to continue supporting the 2C/3A IFQ program for the charter halibut industry adopted in April 2001. I think that passing this program was a wise and futuristic move. The IFQ program for the charter industry will put stability between the charter and commercial fleet. I think it is a well thought out program and allows for a lot of flexibility.

Don't allow Governor Knowles to dictate to the Council how our fisheries should be run. Where was he during the 9 to 10 year investment in time it took to put this program together? I haven't read or heard one good argument from Governor Knowles on why he thinks this program is "not a good idea". It smacks of a hidden agenda, in my opinion.

My family and I have been commercial longline fisherman since 1978. One hundred percent of our income comes from this industry. Furthermore, our family operation provides income for three other families. We've been through a lot of changes in this fishery and the IFQ program has worked very well for this industry. It also adds to the economy of the state through the buying and selling of IFQ's.

I urge you to continue to support this program for the charter fleet, in my opinion, this is a fair and equitable solution to a growing problem. Thank you for your attention to this letter and also, thank you for all the time and effort you put into managing our fisheries.

Sincerely,



Sheryl L. Mayo

SITKA CHARTER BOAT OPERATORS ASSOCIATION
PO Box 2422 SITKA ALASKA 99835

26

SEPTEMBER 21, 2001

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

RECEIVED

SEP 24 2001

Dear Council Member:

The Sitka Charterboat Operators Association is glad you are revisiting the Halibut Charter IFQ Program. As we have stated before, we are against any charter IFQ program because the *initial purpose and need for action* is in error. There is no "rapid, uncontrolled growth of the guided halibut charter industry." From 1996 to 2000, the percentage of total halibut harvested by the recreational industry decreased from 20 percent to 11 percent. Commercial bycatch of halibut remains two to three times the total recreational harvest!

N.P.F.M.C

The current allocative proposal is promoted by the longliners, for the sole benefit of longliners. There is no concern for conservation.

We continue to believe IFQs are inappropriate for recreational fishing. Charter IFQs will result in the privatization of a public resource and by creating an artificial cap on the charter fleet, provide less opportunity for the public to fish for halibut.

It is ironic that a main impetus for the establishment of commercial halibut IFQs was to increase the safety of fishermen on the water. With halibut charter IFQs, bare boat charters (without a captain onboard) will become much more attractive and put sport anglers, who are unskilled in Alaskan waters, in a much more precarious situation.

We feel the analysis is lacking a bonafide economic analysis on the charter industry in Alaska, and recreational fishing demands in Washington and Oregon.

We continue to believe there are other means to manage recreational halibut fishing. We are regulated by bag and possession limits, and season closures. We have a Local Area Management Plan (LAMP) for Sitka Sound, and we are open to local charter moratoriums. Thank you in advance for your time.

Sincerely,



Dennis Cook
President

RECEIVED
SEP 24 2001
N.P.F.M.C.

Sept 19, 2001

North Pacific Fishery Management Council
605 West Fourth Ave #306
Anchorage, Alaska 99501

Subject: IFO proposals for Charter
Boats clients as Users of the
Public Trust halibut fisheries

It has come to my attention that
the issue of IFO for Charter Boat operators

will be reexamined in the near future.
I have submitted my opposition to these

IFOs in years 2000 & 2001 hearings. I consider
them in violation of the US Constitution's

equal protection mandates. They specifically
violates Article 14 Section 2 Privilege and
Immunities, and Amendments I and XII

protection of life, liberty or property without
due process of law and equal protection of
the law.

Sincerely

Wale Bondurant

31864 Moonshine Dr

Seldovia AK 99669

RECEIVED

SEP 24 2001

April 3 2001

North Pacific Fishery Management Council

605 West Fourth Ave # 306

Anchorage Alaska 99501

Subject: IFQ proposals for Charter Boats

and Subsistence USEF priority based

on rural preference and native preference.

I consider the IFQ scheme to be an

absolute denial of the so-called free enterprise system, that our Nation has so publicly and proudly advocated to the world. Instead, it creates a prescribed exclusionary class of monopolistic private ownership of a common property Public Trust fishery resource.

This North Pacific Fishery Management Council, which I believe, has shown no

responsibility and concern for the rights of the true beneficiaries, the public as a whole, ie including the user clients of the halibut charter services.

I consider the Council to be committed

to the exclusionary commercial interests; and supportive of the erosion of the open

access right of the common personal USER public as a whole.

I have reach my opinion after attending and observing the many January 2000 and February 2001 Council meetings in Anchorage.

I submitted position papers to the International Pacific Halibut Commission, North Pacific Fishery Management Council and Alaska Department of Fish and Game, Sport Fish Division in January 2000, citing references in support for the Common Personal Consumptive USERS of these Public Trust fishery resources.

At the February 2001 Council meeting I submitted further testimony which I am again included, as I believe is necessary as I am aware of the Council's failure to consider at that time.

I also believe that the Commissioner of Commerce representation in support of the Council's position and attitude is not in the best interest of the public as a whole and their right of open access to these common property Public Trust resources. The Commissioner has a Trustee responsibility to these common property beneficiaries for now and

and future generations

I am attempt to further research the

Commissioners responsibility I looked

up the Dept. of Commerce in the US

Government Code; under 22 paragraph 1-1620

paragraph 258 "International Organizations

Entitled To Enjoy "certain Privileges, Exemptions

and Immunities" was listed the International

Pacific Halibut Commission

The Privilege and Immunities phrase

reminded me of the mandate of individual

right in Article V Section 2 of the

US Constitution: "The citizens of each

state shall be entitled to all privileges and

immunities of the citizen of the several

state."

This phrase was the results of a confusion

by the large colonies desire to give there

residents a protected right to their more

plentiful resources. The small colonies would

not accept such exclusionary treatment

and stated such a scheme would in

fact create a union of nations and not

that of not a Nation of United States.

I am aware that Mr Lerman Ex

Director of the IPHC stated that

the Commission had a robust commitment

Copied Feb 8 2001 Letter to NPFMC

(907) 262-0818

31 864 Moonshine Dr
Soldotna AK 99669

Mark B. Berman

Sincerely

In support of the personal common
consumptive USERS of this public
owned halibut fishery resource
I request that the Council and the
US Commissioner of Commerce give full
support to equal open access to the
public access within the biological
sound management on the sustained
Yield basis. This active support
must remove the intent of all exclusionary
schemes and not be based on rural
preferences and native preferences

**The
Alaska
Constitutional
Legal
Defense
Conservation
Fund, Inc.**

P.O. Box 110551
Anchorage, Alaska
99524-4001

Founded in 1994
for the purpose of
common use of fish,
water and wildlife
and access to public
lands and public
waters in Alaska.

Directors:

Bondurant
(907) 262-0818
Warren E. Olson
(907) 346-4440
Tim Stevens
(907) 345-3804
Joe Caraway
(907) 345-4719
Frank DiPofi
(907) 344-6698

February 8, 2001

RECEIVED

SEP 24 2001

North Pacific Fishery Management Council
605 West Fourth Avenue, #306
Anchorage, Alaska 99501

N.P.F.M.C

Dear Sir,

Our organizations purpose is to provide representation for the Public Trust Doctrine beneficiary owners (the public) of those common property halibut fishery resources. We believe that this public trust ownership mandates, that the North Pacific Fishery Management Council, as trustees, are to provide this ownership allocation first, so as to assure the public beneficiary (personal consumptive fishermen, sport fishermen and subsistence fishermen) will all have equal consideration to participate within sustained yield principles.

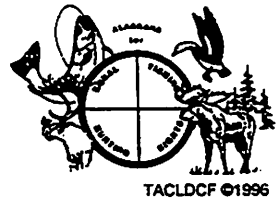
As allocation trustees the Council's lack of concern; as to the impact of their proposed IFQ, caps and Guideline Harvest Levels and other regulations programs, will have a detrimental effect on these personal consumptive USERS (including Charter Boat clients) which invalidates your regulator authority.

It remains that the Councils first responsibility is to assure equal access to the personal consumptive USER of these common property halibut fishery resources.

Instead these restrictive programs purposely create a predetermined limited level of access, not to be changed to compensate for this growing population of Public Trust USERS of these common property fishery resources.

I wish to point out that I personally addressed these points in documented letters as of January and February 2000, with copies to the North Pacific Fishery Management Council, the International Halibut Commission and the Sport Fish Division of the Alaska Department of Fish and Game. At this time we are willing to further furnish Council members who wish additional copies for more specific review.

In addressing the Councils October 2000 adoption of their Subsistence priority qualifications, we must challenge their legal advice that (1) Federal Law does allow for rural preferences (and Native Preferences).



But due to State of Alaska -V- Native Village of Venetie Tribal Government, unanimous decision by the US Supreme Court, which holds that 'all such aboriginal claims by Alaska Natives are here by extinguished' as indicated by explicitly expressed provisions of the Alaska Native Claims Settlement Act (ANSCA); which was enacted by the federal government.

The Court findings cited by the federal legal adviser for the Council failed, to recognize as most controlling, the important Venetie decision; which in fact and intent eliminates any implied federal treaty responsibilities and or commitments with Alaska Natives.

We believe that the Council's action on this issue of subsistence priority for personal USE halibut harvest, has expanded such exclusion priorities for the sole benefit of an ethnic identified class which also allows them to leap over the rural residency boundaries; and thereby is an explicit violation of the US Constitution Article XV which forbids racial based discrimination.

Sincerely,



Dale Bondurant, President TACLDCF

For your information we have enclosed:

1. Copies, Jan. & Feb. 2000 to NPFMC, IHC, AFG
2. Copy, "Putting The Public Trust Doctrine To Work", Second Edition, June 1997

RECEIVED

SEP 24 2001

N.P.F.M.C

January 23, 2000

North Pacific Fishery Management Council
605 West Fourth Avenue, # 306
Anchorage, Alaska 99501

Subject: The North Pacific Fishery Management Council's proposals to limit charter boats participation and to reduce their clients bag limits to one halibut per day.

No reasons have been presented to indicate that these proposed actions are fundamentally necessary for the protection of the sustained yield conservation of these common property public trust fishery resources. In fact, we find that the councils admitted purpose is to limit common personal consumptive users allocation, and to provide that for a prescribed exclusionary class of commercial harvester. (ie IFQ).

As common consumptive users of the public trust fish, wildlife and waters; we submit the following cited legal opinions as information to the North Pacific Fishery Management Council, in support of our position:

- I. Alaska vs. Ostrosky
Cited as 667 p2d 1184 (Alaska 1983)

Justice Robinowitz dissenting opinion, which has since been effectively adopted, by the Alaska Supreme Court, in several related cases:

- (a) "Free transferability (ie limited entry permits now likewise IFQ) impairs rights guaranteed by three separate clauses of the Alaska Constitution."

Article VIII

Section 3 "Wherever occurring in their natural state fish, wildlife and waters are reserved to the people for common use."

Section 15 "No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the state."

Article I

Section 1 "All persons are equal and entitled to equal rights, opportunities and protection under the law."

"The common use clause necessarily contemplates that resources remain in the public domain, and will not be ceded to private ownership."

"Since the right of common use is guaranteed expressly by the constitution it must be viewed as a highly important interest running to each person within the state." "In my view, Article VIII Section 3 still mandates that limited entry be achieved through the least possible "privatization" (ie IFQ) of the common resource."

The no exclusive right or special privilege of fishing clause was adopted, into the Alaska Constitution, from a federal statute (ie The White Act) that congress passed before statehood; and reflects the continued recognition of the public trust doctrine responsibility in the management of the common use of our replenishable resources for and by the people as a whole.

II. Owisichek vs. Alaska
Cited as 763 p2d 488 (Alaska 1988)

This case also cites the dissenting opinion of Justice Robinowitz, in the Ostrosky case. It explicitly references the "Public Trust", "Public Trust Doctrine" and the common use clause over 40 times.

Page 493 "The expression for common use implies that these resources are not to be subject to exclusive grants or special privileges (ie IFQ) as was so frequently the case in royal tradition."

Page 494 "The development of free institutions has led to the recognition of the fact that the power or control lodged in the state, resulting from this common ownership, is to be exercised like all other powers of government as a trust for the benefit of the people, and not as the prerogative for the advantage of the government, as distinct from the people, or for the benefit of private individuals as distinguished for the public good."

Page 497 "Admittedly there is a difference between (footnote 15) commercial fishermen and professional guides." "A commercial fisherman takes his catch himself before selling it to others for consumption, while a hunting guide does not actually take the game, a privilege reserved for the client." "We view this as an insignificant distinction that does not remove the professional hunting guide from protection under the commons use clause." "The work of a guide is so closely tied to hunting and taking wildlife that there is no meaningful basis for

distinguishing between the right of a guide and the rights of a hunter under the commons use clause."

Contrary to the public propaganda, that some expound, charter operators are not commercial fishermen. They in fact furnish commercial transportation and expertise needed to their clients, who are the personal consumptive USERS of the common property public trust fishery resources.

Another false propaganda concept is that those non-resident clients are a bunch of free loaders. The state of Alaska recently lost a federal court case because we were charging non-resident commercial fisherman three times as much as residents. The court found that since residents pay no taxes in support of fishery management costs, the state could not charge non-residents any more.

But in the case of sport fishing, the state of Alaska is now charging non-residents up to eight times as much as residents. No other state charges such differences.

The courts have consistently found that the public trust fishery resources belong to all citizens as a whole. Discrimination based on either interstate or intrastate residency has been judged to violate the United States Constitution's privilege and immunities doctrine, as well as the due process and equal protection clauses of the 14th amendment.

III. McDowell vs. State
Cite as 785 p2d 1 (Alaska 1989)

This case cites both the Ostrosky and Owisichuk cases is reference to the open access clauses of the constitution and the exclusionary fisheries such as limited entry.

Pages 9
& 10

"Since the common use clause of section 3 and the no exclusive right of fishery clause of section 15 remain in the constitution, the premise of the argument is that whatever system of limited entry is imposed must one.... which entails the least possible impingement on the common use reservation and on the no exclusive right of fishery clause." "The argument concludes that free transferability does not entail that least possible impingement on the anti-exclusionary values which these provisions reflect." "The premise of this argument is logical."

"The optimum number provision of limited entry act is the mechanism by which limited entry is meant to be restricted to its constitutional purpose." "Without this mechanism limited entry has the potential to be a system which has the effect of creating an exclusive fishery to ensure the wealth of permit holder and permit values, while exceeding the constitutional purposes of limited entry." "Because of this risk of unconstitutionality exists, the commercial fisheries entry commission should not delay in embarking on the optimum number process."

When comparing the system IFQ's with that of limited entry, we find that it has the same potential of creating an exclusionary class to ensure the wealth of IFQ holders and IFQ permit values; while impinging on constitutional rights of the common personal consumptive USERS. Because of this risk of unconstitutionality and violation of the Public Trust, the council's responsibility is to not delay in maintaining an optimum number process for IFQ's within this commercial halibut fishery.

III. Payton vs. Alaska
Cite as 938 p2d 1036 (Alaska 1997)

This case specifically addresses the important constitutional differences between USE and USERS.

Page 1042 "Accordingly we consistently have interpreted customary and traditional to refer to "USES" rather than "USERS"

The Alaska Constitution addresses these differences in explicit sections of Article VIII.

Section 4: Fish, forests, wildlife, grasslands and all
(sustained yield) other replenishable resources belonging to the state, shall be utilized, developed and maintained on the sustained yield principle, subject to preferences among beneficial USES.

The open access clauses of section 3 common use, section 15 no exclusive right or special privilege of fishery and section 17 uniform application all mandate that there be no preferences among USERS.

v. Totemoff vs. State
Cite as 905 p2d 954 (Alaska 1995)

We take the position that the fish, wildlife and waters are common property public trust resources. The legislators as trustees management, are responsible to the people as a whole, who are the beneficiaries (USERS).

The Alaska's constitution's Article VIII "Natural Resources" is the finest of any in the nation and is a valid foundation guide line for the management of these replenishable common property fish, wildlife and water resource.

The Alaska Supreme Court has a history of valid judicial findings that are based on recognition of the Public Trust Doctrine and Equal Protection under the law doctrines of both the United States and Alaska Constitutions. Within this history, we are prepared to defend the personal consumptive common use right of the people as a whole.

In the Totemoff case the Alaska Supreme Court has established their first line of authority in these matters.

Page 955 "Alaska Supreme Court is not bound by decisions of federal courts other than the United States Supreme Court on questions of federal law."

With this edict in mind, the people as a whole will welcome a final decision on their equal constitutional right as common consumptive USERS of these halibut fishery resources.

Submitted on behalf of concerned public interests.

Dale Bondurant

Dale Bondurant
31864 Moonshine Drive
Soldotna, Alaska 99669

Sam E. McDowell

Sam E. McDowell
336 E. 23rd Avenue
Anchorage, Alaska 99503

cc: Concerned Alaskans
Concerned Americans

February 24, 2000

International Pacific Halibut Commission
P.O. Box 95009
Seattle, Washington 98145-2009

Attention: Director Bruce Leaman

The proposed (year) 2000 Saltwater Sportfishing Charter Vessel Logbook, on the surface is an excellent management tool. Any increase in accurate harvest information may help project in-season management decisions, related to preferences among beneficial USES of said fisheries.

But by setting caps (i.e. IFQ and GHL) on charter operators, in fact and intent, is a limit of harvest by their clients who are bonafied common personal consumptive USERS of these public trust fisheries resources.

That fact alone, violates the Public Trust Doctrine which mandates that the common property fish, wildlife, and waters are reserved for the people as a whole, who are the valid beneficiaries of these public trust fisheries.

The following foundation of facts are submitted as proof of this violation:

- (1) Subsistence, personal use and sport are all recognized methods and means of common use; and as such, constitutionally requires broad and equal access opportunities for the people as a whole, to the public trust resources.
- (2) The Alaska Constitution: Article VIII is explicit in its resource mandates.

- (a) Section 4 provides for sustained yield management, with preferences among beneficial USES. The sustained yield principle not only mandates the conservation of these fisheries into perpetuity, but it also requires that the public as a whole be provided, both qualitative and quantitative opportunities for personal consumptive USERS, as the valid beneficiaries of these public trust resources.
- (b) Section 3 provides that: "fish, wildlife and waters are reserved to the people for common use." Section 5 provides that: "No exclusive right or special privilege of fisheries shall be created or authorized in the natural water of the state." Section 17 provides for "Uniform application of law and regulations governing use of natural resources." (These sections have been cited, in Supreme Court decisions, to require that common USERS be given adequate considerations as beneficiary participants in the harvest of public trust resources.)
- (c) The Alaska Constitution Article I, Section 1 has also been cited by the Supreme Court as to mandate equal protection under the law for the common use of public trust fish, wildlife and water resources.

(3) The United States Constitution:

- (a) One line of bias questioning repeatedly pursued by council members was related to what percentages of charter operators and their clients were residents or non-residents. It was clearly apparent that commercial participation percentages were not pursued on such a distinguishable basis.
- (b) As a Union of States and not a Union of Nations; the Privilege and Immunities clause of the 14th Amendment recognizes that the right to pass freely from one state to another is an incident of national citizenship. The Equal Protection clause of that amendment mandates that rights afforded to some are granted to all. Those rights

include protection to life, liberty and property and are common to the public as a whole and are individual entitlements grounded in state law.

- (c) The Supreme Court has ruled that residents and citizens are synonymous and grants no deference as common personal USERS of the common property fish, wildlife and water public trust resources.
- (4) Charter operators are not commercial fishermen. Professional guides do not take the fish, a privilege that is reserved for their clients, and there is no meaningful basis for distinguishing between their rights under the common use clause.
- (5) Exclusionary classes of limited entry commercial fishery participants are not valid common USERS of public trust fishery resources. Before limited entry, when the public as a whole had open access to the commercial fisheries, they were in fact common USERS. But with the advent of exclusionary limited entry (i.e. IFQ and historical GHL) such a fishery has no right to impinge upon the privileges and immunities of common USERS of the public trust halibut fishery resources.
- (6) During the February meeting of the North Pacific Fishery Management Council, on two separate occasions Commission Director Dr. Bruce Leaman testified that Canada and the United States have the "robust" commitment to support common use participants of these halibut resources. He then counter claimed, that the adoption of IFQ and historical based GHL can be an acceptable method to contain the expected growth of the charter sector of the common use halibut fisheries. Sanction of such a method equates to official permission for exclusionary limited entry commercial harvesters impingement upon the common use clients right of broad and open access to these public trust halibut fisheries; and as such violates the United States and Alaska Constitutions, and the Nation's commitment to the Public Trust's common use doctrine.

In light of the North Pacific Fishery Management Commission's "robust" support of common use, it is requested that this pronounced attack be rejected in whole.

Enclosed is a copy of written testimony submitted to the council and is germane to the validity of the common use issue.

Submitted on behalf of concerned public interests.

Dale Bondurant

Dale Bondurant
31846 Moonshine Drive
Soldotna, Alaska 99669

Sam E. McDowell

Sam E. McDowell
336 E. 23rd Avenue
Anchorage, Alaska 99503

cc: Alaska Department of Fish and Game
Sport Fish Division
Kerri Tonkin, Regulation Specialist
Concerned Alaskans
Concerned Americans

February 24, 2000

Alaska Department of Fish and Game
Sport Fish Division
1255 West 8th Street
Anchorage, Alaska 99501

Attention: Kerri Tonkin, Regulation Specialist

Subject: 2000 Saltwater Sportfishing Charter Vessel Logbook

Enclosed are copies of two written testimonies; one submitted to the North Pacific Fishery Management Council and the other to the International Pacific Halibut Commission. Both are germane to the common use issue; and it is requested that you review the same and accept their purpose as valid support of the common USERS of these public trust resources.

Your request for comments on the proposed 2000 Saltwater Sportfishing Charter Vessel Logbook is recognized to have a valid purpose in the management of common use of the public trust fisheries.

It is apparent to be your first responsibility to support the broad and open access of valid personal use of these common property public trust fishery resources.

Private ownership of IFQ for charter operator's halibut harvest creates an exclusionary limited entry fishery designed to overstep the broad and open access rights of the common use clients as beneficiaries of the public trust resources. The passage of such a scheme, including guideline harvest levels that effect the right of equal protection of the law, is not due process as is mandated by the 14th amendment of the U.S. Constitution and is a blatant violation of the common use protection of the Alaska Constitution.

Sincerely,

Dale Bondurant

Sam E. McDowell

Dale Bondurant
31846 Moonshine Drive
Soldotna, Alaska 99669

Sam E. McDowell
336 E. 23rd Avenue
Anchorage, Alaska 99503

Cc: North Pacific Fishery Management Council
International Pacific Halibut Commission
Concerned Alaskans
Concerned Americans

RECEIVED 28

Sept. 24, 2001

907-271-2817

SEP 24 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council

N.P.F.M.C

I urge you to support the halibut IFQ program for halibut charter vessels. I strongly recommend that you vote against rescinding the program.

The government (Council) forced all the commercial longline fleet into the IFQ program. People have invested in it. To allow the charter fleet to continue to grow at the expense of the longline fleet seems to me to be the government selling something (IFQ shares) to one person and taking it back to give open ended to another, yet requiring the first to still pay for what is no longer there. What a good deal for the commercial charter fleet and a mockery of the longline IFQ program already in place as well as the whole council process. After 7 years of being studied and over 8000 comments or petition signatures, as well as hours of public testimony I believe that there is no new information come forth as to why this program should be rescinded. Voting to rescind the charter IFQ program would be pure politics being used to override a rational program and the Council.

Charter IFQ's are needed to rationalize an out of control charter fishery. They are needed to stabilize both the longline and charter fisheries. Allocation disputes will continue until a long term market based solution is in place.

My family depends on the commercial longline fishery for a major part of our income. My children fish with us and this concerns their future as well. The commercial longline fleet is economically good for the State of Alaska as commercial halibut money goes to nearly every business in all the coastal towns to say the least.

Thank you for your time.

Randy + Carolyn Nichols

Randy & Carolyn Nichols
305 Islander Drive
Sitka, AK 99835

907-747-3146

RECEIVED

SEP 24 2001

N.P.F.M.C

29
Paul A. L. Nelson
P. O. Box 858
Haines, Alaska

99827
907-766-2458 days

September 19, 2001

Mr. David Benton
Chairman - NPFMC
605 West 4th Ave. Ste 306
Anchorage, Alaska 99501-2252

RE: IFQ program for charter halibut vessels.

Dear Mr. Benton,

I am writing to you to request your continued support of the 2C/3A IFQ program for charter halibut vessels. This IFQ program for charter vessels was adopted in April of 2001. Please do not remove this program after the years of work and study that have gone into it.

The people of Haines get a substantial economic benefit from commercial halibut fishing. Establishing IFQ's for charter vessels will provide stability and supportive management to the entire halibut fishery.

The IFQ program for commercial halibut fishing is well done. Your continued support and good management of the fishery is greatly appreciated.

Thank you for your continued vigilance and hard work for our fisheries.


Paul A. L. Nelson - halibut longliner

cc: Governor Tony Knowles

RECEIVED

SEP 24 2001

30

HALIBUT COALITION

DEAR SIR

N.P.F.M.C

I DONT THINK THE CHARTER IFQ SHOULD BE RESCINDED. BUT IT SHURE AS HELL NEEDS MODIFYING. EXAMPLE, A CANADIAN CAN COME DOWN FROM CANADA PUT HIS BOAT IN AT SKAGWAY AND WITH A LITTLE LUCK DURING THE SUMMER, HE COULD CATCH MORE FISH THAN MY 1000 POUND QUOTA. A SPORT FISHERMAN CAN DO THE SAME THING. I LOST MY BOAT LAST YEAR, SO I FISHED ON A TROLLER DURING THE SEASON, AND THEN HE FISHED MY HALIBUT QUOTA.

WHILE WE WERE TROLLING THE CHARTER FLEET CAUGHT THEIR QUOTA, THEY SAID THEY COULNT STOP THE SPORTSMAN SO THEY PUT THEM ON THE TROLLERS QUOTA THAT IS BULL SHIT. THE CHARTER BOAT IS A BUSINESS JUST LIKE THE TROLLER.

IDEAS YOU CAN CUT THE NUMBER OF HALIBUT DOWN FOR SPORT FISHERMEN FOR THE YEAR, AND SALMON. OR YOU CAN MAKE A LAW THAT A CHARTER BOAT OPERATOR OR OWNER HAS TO BE A ALASKAN CITIZEN. SOMETHING HAS TO BE DONE OR THEY WILL HAVE ALL THE QUOTS. THERE ARE TO MANY CHARTER BOATS NOW.

Ed Bruce

ED BRUCE

31

September 5, 2001

RECEIVED

Fairweather Fish, Inc.
F/V Golden Chalice
6320 Rosedale St. N.W.
Gig Harbor, WA 98335

SEP 24 2001

N.P.F.M.C



Charter IFQ Program

Mr. David Benton Chairman
North Pacific fishery Management Council
605 West 4th Ave. Ste # 306
Anchorage, AK 99501-2252

Dear Mr. Chairman,

We are writing to voice our concerns about rescinding the Charter IFQ Program. The formation and decision to adopt IFQ's for the Charter boats in areas 2c/3a has already taken up many council hours. The time to present evidence against this program has past, and we *all* had a fair opportunity to voice our opinions. Going back on this decision will undermine the Council's authority. It will create a huge lack of faith in a system, recently praised by the media.

Our family and the families of the crew of the Golden Chalice depend on the commercial halibut fishery for a significant part of their annual income. The Golden Chalice is a 58' longliner, fishing in nearly every regulatory area for halibut and sablefish. The boat and crew of five spend 6 to 7 months of every year in Alaska, and during that time, they support many Alaskan businesses. Currently, three of our crew are Alaska residents living in Homer and Kodiak.

Please continue to support the IFQ program for Halibut charter boats in 2C and 3A. We appreciate your consideration of our comments.

Sincerely,

Lisa Newland
President
Fairweather Fish, Inc.

Copy: Governor Tony Knowles
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

32

Cordova District Fishermen United

Celebrating 65 Years of Service to Commercial Fishermen in Cordova, Alaska
P.O. Box 939 Cordova, Alaska 99574 / Telephone (907) 424-3447 / Fax (907) 424-3430

September 21, 2001

Mr. David Benton, Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501-2252

SENT VIA FACSIMILE TO 907.271.2817

RECEIVED

SEP 24 2001

N.P.F.M.C

Dear Chairman Benton,

Cordova District Fishermen United is writing to express strong support for the halibut charter boat IFQ program approved in April of this year, and to ask Council members to vote against rescinding the program.

The Council's approval of a charter IFQ program is the culmination of many years of thorough development and analysis of a long-term solution to bitter allocation disputes, overcapitalization of industry sectors, and inefficient use of fisheries management resources. These are some of the most crippling problems facing our nation's fisheries and the people and communities who depend on them, and the Council's action on this issue is highly commendable.

Council Staff and the Scientific and Statistical Committee developed the charter IFQ program with significant guidance from the charter sector, substantive agreement and compromise between the charter and commercial sectors, and very detailed analysis and review. Over 8,000 written comments or petition signatures, and countless hours of public testimony support the charter IFQ program.

The CDFU Groundfish Division membership, made up of both charter and commercial fishermen, has been unanimous in its support of the halibut charter IFQ program.

The State of Alaska's position against the charter IFQ program and in favor of a charter license moratorium and a GHL is not supportable or credible historically as a long-term solution to allocation disputes and overcapitalization. In light of all of the Council's recent efforts to rationalize other fisheries, and in light of the State of Alaska's experience with

latent effort in limited entry fisheries, the State's position is a step backwards in fisheries policy.

Voting to rescind the charter IFQ program would be a purely political action riding roughshod over the traditional Council process of thorough and open review and analysis of fisheries resource management issues.

With declines in prices and abundance of salmon and herring in Prince William Sound, many of our fishermen have invested in, and come to depend considerably on the halibut and blackcod IFQ fisheries for the economic stability that they provide. The community of Cordova benefits substantially from this economic stability as well. Rescinding the charter IFQ program would be economically harmful to fisheries dependent communities such as Cordova, and it would destabilize both the charter and commercial halibut sectors through continued allocation disputes. This would be a fisheries policy step in the wrong direction, and we ask for your continued support for the halibut charter IFQ program.

Sincerely,

Sue Aspelund

Sue Aspelund
Executive Director

Dan Hull

Dan Hull
Groundfish Division Co-Chair

CC: Gov Knowles

33

September 24, 2001

To: Mr. David Benton, Chairman
NPFMC
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RECEIVED

SEP 24 2001

From: Gerry Merrigan
Box 1065
Petersburg, Alaska 99833

N.P.F.M.C

Re: **C-1: Halibut Charter IFQ: Motion to Rescind Undermines Public Process**

Dear Chairman Benton,

I am a commercial halibut IFQ fisherman in Area 2-C as well as member of Petersburg Vessel Owners Association and the Halibut Coalition. I have participated at the NPFMC for the last four years in regards to the resolving the allocation issue between commercial and charter halibut fishermen. I also served as a technical advisor to the Charter IFQ Committee.

I strongly urge the Council to support your April 2001 final action of adoption of a charter halibut IFQ program. **Please do not rescind this action.** As in most Council actions, there was considerable public process and analysis resulting in a solution where every party made considerable concessions to achieve resolution. Similar to other Council actions, the process of resolving the allocation issue was done incrementally in deliberative logical fashion finally resulting in the adoption of the charter halibut IFQ program.

The Council public process on this general allocation issue spans eight years and sixteen meetings with three opportunities for public testimony at each meeting. Additionally, there were three public committees established. In regards to charter IFQs, this topic was on the Council agenda in some form for five meetings with additional public IFQ Charter Committee meetings. There was considerable public process and opportunity for public input that went into the Council's decision. A poll at the time of final action in April indicated that in Anchorage area, 68% of the public were aware of the issue.

I urge you not to rescind for two basic reasons:

1.) **There is no new significant, compelling, and relevant information in front of the Council to support a rescind motion. The only changes that have occurred since April 2001 are purely political in nature.**

2.) **A rescind motion completely undermines the Council public process. To rescind sends the message that the NPFMC does not need nor serve the public.**

As an Alaskan resident, it is not clear to me who the State of Alaska is representing. The State has had a voting representative at the table at all meetings and has voted in favor to initiate the analysis of charter IFQs (February 2000) as well as moving the analysis forward and releasing for public review prior to final action. The State also has representatives at all the Charter IFQ Committee meetings. The State of Alaska participated and was involved in the public process and the numerous steps that led to the Council final action in April 2001.

Yet in April 2001 at final action, the State of Alaska placed a position on the table at the eleventh hour. This position was starkly in contrast to the State's previous involvement in the public process. Similar to the rescind motion now in front of you, there was no supporting public process to arrive at the State of Alaska's position. No public stakeholder meetings were held by the State or Governor's Office in developing this position. There was no public meetings of the Board of Fisheries. There were no hearings in the Legislature. Yet, all of these public bodies somehow came to a position on this issue without the benefit of public input. In terms of public process in this issue, the NPFMC is evolutionary while the State of Alaska seems to believe in the creationist theory of public input.

The only changes that have occurred since April is the membership of the Council as well as a letter from Senator Stevens to Governor Knowles urging the Governor to let the Regional Councils do their job. I also urge you to do your job. Please vote to maintain a viable public process that the public can believe in, please vote no on rescinding.

Thank you.



Gerry Merrigan

9/24/01

34

DAVE BENTON

NPFMC

605 W. 4TH AVE

Ste 306

ANCHORAGE, AK. 99501-2252

RECEIVED

SEP 24 2001

N.P.F.M.C

Mr Benton,

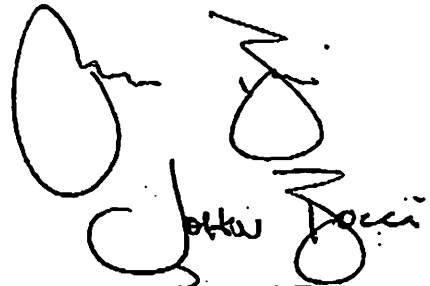
I APPRAVE YOUR DEDICATION AND CONTINUED SUPPORT FOR THE HALIBUT CHARTER IFQ PROGRAM. PLEASE STAY THE COURSE.

HAVING WATCHED & PARTICIPATED FROM THE SIDELINES, I FEEL CONFIDENT THE PUBLIC PROCESS HAS SUCCEEDED IN MAPPING OUT THE FUTURE OF HALIBUT FISHERS STATEWIDE, AND ONCE AGAIN OUR GOVERNOR FEELS COMPELLED TO TURN THIS INTO A POLITICAL ABYSS. ITS LARGELY DUE TO HIS "DE-POLITIZING" THE BOARD & FISH PROCESS THAT'S LED ME TO BUY IFQ'S IN THE FIRST PLACE, AS MY FUTURE AS A SALMON FISHER GROWS INCREASINGLY UNCERTAIN.

AS A LONGTERM COASTAL ALASKA RESIDENT I SEE HIS ACTIONS AS ONLY SERVING TO WIDEN THE RIFT BETWEEN RURAL & URBAN, SPORT AGAINST COMMERCIAL AND THE CONTINUING DOWNWARD TREND OF OUR COASTAL POPULATION. COMMERCIAL FISHING IS VERY MUCH PART OF ALASKA'S ECONOMY AND DEPENDS

DISASTROUS TO CONDUCT BUSINESS. At the
time, I thought the state of Alaska felt the
same way, now I'm NOT so sure.

The current Administration has left a
DISASTER in its wake from Barrow to
Ketchikan, please don't contribute any more
food to the casualties. Thanks for your
support.



Box 1312

CORDOVA, AK

99574

907 424 5182

C.L. Gov. Knowles

35

RECEIVED

SEP 25 2001

NPFMC

SEP 18-01

MR. BENTON:

I AM A HALIBUT FISHERMAN IN AREA 3A I USE A SMALL 24' SKIFF & WORK MOSTLY INSIDE PRICE WILLIAM SOUND. HALIBUT PROVIDES A SIGNIFICANT AMOUNT OF MY FAMILY INCOME.

I BELIEVE THE CHARTER IFO PROGRAM WHICH HAS BEEN DEVELOPED IS THE ONLY ANSWER TO CONFLICT IN THE HALIBUT FISHERY. FOR THE PAST SEVERAL SEASONS THERE HAVE BEEN PROBLEMS IN FRONT OF THE BOARD OF FISHERIES (ANSWER) TO LIMIT COMMERCIAL OPERATOR IN PRICE WILLIAM SOUND. OBVIOUSLY IF I DON'T FISH INSIDE THE SOUND - A 24' BOAT & 4,000# OF IFO'S - I'M OUT OF BUSINESS. SINCE THE IFO CHARTER PROGRAM HAS BECOME A LIKELY SCENARIO THOSE PROPOSALS HAVE MOSTLY STOPPED. THE CHARTER OPERATORS I WORK AROUND ARE PLEASSED WITH THIS PROGRAM OPTION & BELIEVE AS DO I THAT THIS IS A SOLUTION TO THE CONFLICT. RESCUING THE CHARTER IFO PROGRAM WOULD BE POLICIES PROMOTED BY A FEW

BIG CHARACTER OPERATIONS THAT WOULD LIKE
CONTINUED EXPANSION WITHOUT INVESTMENT
IN THE BIOMASS.

I WOULD LIKE THE MANAGEMENT COUNCIL
TO MANAGE THE RESOURCE RATHER THAN
TRY TO SOLVE ALLOCATION.

THANKS

John Schneider
HC 72 Box 7193
Paxson, AK 99737

Copy: Governor Knutson

36

RECEIVED

SEP 25 2001

Sept 17

N.P.F.M.C

Dear Mr Benton;

I urge you to continue supporting the 2c/3A IFQ program for charter halibut boats adopted in April 2001, and recommend you vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 4000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded.

Voting to rescind the charter IFQ program would be through politics overriding rational management, and not in keeping with Council tradition.

I have invested much in IFQ and depend on the commercial halibut fishery for a large part of my income. Many businesses also depend on IFQ money.

Rescinding the charter IFQ program will
(over)

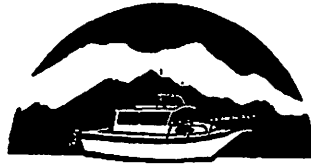
mean continued allocation disputes and instability in both fisheries

Charter IFQs are needed to allow fisheries management to focus on management rather than allocation disputes

Thank you

Harland Christensen
11194 Hawkost Rd
Anacortes, Wa 98221

FV Sea Crest



SITKA'S SECRETS

RECEIVED

SEP 24 2001

N.P.F.M.C

September 24, 2001

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

Dear Council Member:

Thank you for revisiting the Halibut Charter IFQ Program. Hopefully, upon closer examination, you will vote against any charter IFQ program.

The need for a charter IFQ program has never existed. There never was a "rapid, uncontrolled growth of the guided halibut charter industry." If there was, how do you explain the decrease from 20 percent to 11 percent, between 1996 to 2000, of the percentage of total halibut harvested by the recreational industry? If the problem is uncontrolled charter harvest of halibut, why is commercial bycatch of halibut two to three times the total recreational harvest?

We continue to believe IFQs are inappropriate for recreational fishing. Charter IFQs will result in the privatization of a public resource. We also feel the Council's analysis is very lacking in the economic impacts of this ruling to Area 2C.

We encourage you to vote against any charter IFQ program, and let us get back to where we were before the commercial longliners made up this issue.

Sincerely,

Beverly P Minn

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4 Th. Ave. Ste 306
Anchorage, AK 99501-2252

RECEIVED

SEP 25 2001

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 200 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

I'm not going to waste any more time discussing the vulnerability of my livelihood and financial status on this issue. I have discussed that in quite a few previous testimonies. At this point I consider it intuitively obvious. What is now at stake as far as I am concerned is the integrity of NPFMC to operate with public input. There has been support for this from members of the charter boat fleet as well as the commercial fishing fleet; a vote has been taken. If you rescind this action it will set bad precedent.

I hope that you decide to abide by your currently standing decision. Thank you for your consideration.

Sincerely,


James C. Hughes

P.O. Box 22, Pelican, AK 99832

Petersburg Vessel Owners Association

P.O. Box 232
Petersburg, Alaska 99833
Phone (907) 772-9323 Fax (907) 772-4495

September 25, 2001

RECEIVED

SEP 25 2001

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

N.P.F.M.C

Subject: October 2001 Agenda Item C-1: Halibut Charter IFQ Program

Dear Chairman Benton:

Petersburg Vessel Owners Association is a diverse group of commercial fishermen, many of whom participate in the halibut fishery affected by this program. We would like to take this opportunity to strongly urge the council not to rescind the halibut charter IFQ program that was passed in April. PVOA supports the IFQ program for charter boats and opposes any attempt to overturn the decision.


In 1993, the council began considering management alternatives for the halibut charter industry, recognizing that an expanding charter fleet resulting in an unlimited expansion of charter halibut harvests at the expense of other users was a management problem. Recent debates over the appropriate levels of halibut allocation and the history of past allocative struggles leads us to believe that although the GHL package was a step in the right direction, further action is necessary to provide closure to the issue of halibut allocation. We feel that the IFQ program, with its generous charter allocation and its provisions for the transfer of commercial IFQs to the charter sector, is likely to prevent the type of ongoing battle that has ensued in the past over allocation issues.

The final action by the council was the result of years of analysis, research, public comment, and hard work by all stake holders. When considering this issue, the Council went through an eight-year process; committees were formed, input was taken from many charter operators as well as commercial fishermen, and ample opportunities were provided for public comment and involvement of both the charter and commercial halibut industries. The IFQ program that was passed in April is the result of discussion and compromise between the affected parties. At this time, we are revisiting the issue, not because new evidence has surfaced that should be considered, but because of pure political pressure. No compelling reason to rescind the program has been presented.

IFQs for the charter fleet do more than protect commercial fishermen who have made substantial investments in halibut IFQs, vessels, and gear from continuous encroachment by an unregulated charter industry. The charter IFQ program also fairly allocates quota shares to charter operators based on past participation while providing substantial opportunities for industry growth and new entry. IFQs provide stability and give commercial and charter operators the ability to plan their seasons. For these reasons, both commercial and charter operators affected by the regulations supported this action in April and continue to support it now.

In summary, PVOA supports the halibut charter IFQ program because we feel it represents a long-term solution to the halibut allocation problem, because the program was developed with a great deal of public input and support from both the charter and commercial industries, and because it protects commercial fishermen while fairly providing resources to the charter industry. We respect the integrity of the Council process and ask that you value the lengthy public process that led to April's action, stand firm behind a good decision, and don't give in to political pressure. Do the right thing for the commercial and charter halibut fleets by voting not to rescind the halibut charter IFQ package. Thank you for your consideration of these comments.

Sincerely,


Cora Crome
Director

40

To: NPFMC
Pages: 1



Sportsman's Cove Lodge

Alaska's Friendly World-Class Sportfishing

Reservations Office
Post Office Box 2486
Olympia WA 98507-2486

Inquiries 1 800 962 7889
Business 360 956 3442
Facsimile 360 956 0345
www.alaskasbestlodge.com

RECEIVED

SEP 25 2001

N.P.F.M.C

September 25, 2001

Dear Council Members,

On behalf of our staff, and the 1,000 customers that visit us each season, I'm urging you to uphold the April 2001 vote of the Charter IFQ Program. This program will allow the charter fleet to continue to provide guided anglers with the limits established by NPFMC without exceeding the TAC.

Please put an end to the ten plus years of tug-o-war between the Commercial and Sport Charter Fisherman.

Sincerely,

Jeff McQuarrie
President

RECEIVED

SEP 25 2001

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NPEMO

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Sheryl L. Mayo Sheryl L. Mayo	2800 SMC, SITKA AK	10	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Charles L. Bower III CHARLES L. BOWER III	2369# 3 P.R. SITKA AK 99836	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Don Dix	P.O. 6006 SITKA AK 99835	1	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
MORGAN DOUBLEDAY	Box 6507 SITKA AK 99835	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
John Maher John Maher	231 Kathleen - M-37 SITKA AK 99835	8	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
JENNIFER ALLEY Jennifer Alley	PO 8012 PORT ALEXANDER AK 99836	3	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 1

17

FROM: Mayo 2800SMC, Sitka, Ak 99835 FAX NO. : 907 7473413 Sep. 25 2001 09:06PM P2

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Eric Jordan	103 Gibson Place Sitka, AK 99835	4	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input checked="" type="checkbox"/> Charter Operator
Clinton Baird	111 Finnway Sitka	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Lucy Haggen	115. SAND Dollar	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
M.K. Larson	" "	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
CHARLES OLSON <i>(Signature)</i>	3009 HPR SITKA, AK	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Theresa Legman <i>(Signature)</i>	3009 HPR Sitka, AK	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 2

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Steven T. Moffat	P.O. box 6537 Sitka AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Korina M. Maher	PO. box 6537 Sitka AK 99835		<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Robert Thompson	1619 Hillcrest Hill Sawmill Ck. Sitka		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
MICHAEL J. MAYO Michael J. Mayo	2800 Sawmill Ck Rd Sitka AK 99835	7	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Carlene Maher	Box 4203 Homer, Ak 99603	3	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Rick J. Maher	Box 4203 Homer, AK 99603	3	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 3

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
KELLY FERGUSON	5880 HPR, Sitka 99835	4	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Bob Potrzuski	2013 KAINULAINEN, SITKA 99835	5	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Pete J Karas	230 Koguzaitou SITKA AK 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Jeff. D. D...	104A EBERHARDT DR. SITKA, AK. 99835		<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Jf B D +	104 B EBERHARDT DR SITKA AK	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 4

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
John Hedden	1905-B Dodge Cir. Sitka, AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Peg Shea	1309 Edgecumbe Dr Sitka, Ak	6	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
CHANCE ALLEN	101 Austin St. Sitka, AK	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Anthony Huskins	1805 Edgecumbe Dr Sitka, AK	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
John Francachini	404 Mills St. Sitka, AK	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Greg Bell	3912 A HOR Sitka AK	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 5

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Noah S. Mayo <i>Noah Mayo</i>	2800 S.M.C. Sitka, AK. 99835	5	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Jim DiGennaro <i>Jim DiGennaro</i>	105 Northgate St. Sitka, AK 99835	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Katu Udelipa	202 Peterson St. Sitka, AK 99835	5	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Justin Carlson	331 Wortman Ln. Sitka, AK 99835	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Katherine Walsh	3201 HPR Sitka, AK 99835	8	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Adam Wackett	500 Lincoln # M15 Sitka, AK 99835	4	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 6

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Robert L. Chevalier <i>RLC</i>	PO Box 2873 Sitka AK 99835	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Michael R. Eskonen <i>Mike</i>	2820 S.M.C Sitka AK 99835	6	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Steve Lawrie & Larrie	PO Box 2976 Sitka AK 99835	6	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Ron Hegge <i>RH</i>	8328 Misty Lake Cir Sarasota Fl. 34241		<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Boyd D. Dickson <i>Boyd</i>	428 Kogwanan Sitka AK 99835	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23

Page 7

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Thomas J Corso	P.O. Box 6502 Sitka AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Jamie Elstad	P.O. Box 1522 Sitka Ak.	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input checked="" type="checkbox"/> Charter Operator
Tamara Browne	P.O. Box 6547	5	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Mike Dwyer G. White	30 Baranoff St, Sitka, Alaska 99835	3	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Ocean Mayo Ocean Mayo	2800 Sawmill Creek Rd. Sitka, AK 99835	10	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 8

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

N.P.F.M.C

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Walt Pasternak	Box 830 Sitka, AK <i>(also - Cook Inlet Bay)</i>	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Forrest Dodson	607 Etolin ST Sitka, AK 99835	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Isaac Armour Isaac Armour	G D Sitka, AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
George & JACKSON George Jackson	P.O. Box 6247 Sitka, AK. 99835 <i>(no issue w/ derby fish sold complete w/ commercial on)</i>	4	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
PAUL B MORENO Paul B Moreno	Juneau AK 99801 127 J. Franklin St. apt. H 203	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Christopher a Swanson	P.O. Box 164A Ketchikan AK 99930	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 8/14/01

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Mark Britter	Box 3104 Sitka AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Hugh Burton <i>Hugh Burton</i>	104 EBERHARDT DR. (also king salmon) SITKA AK 99835	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Werner Messerer <i>Werner Messerer</i>	99835 315 Waakusetes Sitka AK	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Dan Stockel	PO BOX 1172 SITKA, AK 99835	7	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
John Clancy <i>John Clancy</i> Clancy	P.O. Box 6423 Sitka, Ak. 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Brian Bellos <i>Brian Bellos</i>	Po Box 2566 SITKA AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

TE 8/14/01

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
<i>Russ Butels</i>	<i>2044 Davidson Ave Edna Bay, AK 99950</i>	<i>2</i>	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>Will Pieti</i>	<i>11135 "O" Ave Anacortes Wa</i>	<i>3</i>	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>Linda Nasun</i>	<i>4815 PONTCHARTRAIN DR. PONTCHARTRAIN SLIDELL, LA. 70458 (also Int'l entry)</i>	<i>1</i>	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>Mark Rawby</i>	<i>P.O. Box 656 Sitka AK, 99835</i>	<i>5</i>	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>But R Begma</i>	<i>801 Charles St. #A Sitka, AK 99835</i>	<i>3</i>	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>Darrell Wells Darrell Wells</i>	<i>2309 H.P.R. #30 Sitka AK 99835</i>		<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 8/14/01

Page 3/6

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Jay Krause Jay Krause	Box 1150 SITKA AK. 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Ed Holm Ed Holm	Box 2124 SITKA AK 99835	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Carl A Peterson Carl A. Peterson	F/V Kalifan Box 593 Sitka, AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Chris Carroll Cheri Carroll	F/V Nancy J 107 Eberhardt Sitka, AK 99835	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
MIKE DALY Mike Daly	FV NIKKA 105 Cedar Beach Sitka AK 99835	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Anthony Hays Anthony Hays	F.V. MATILDA BAY JUNEAU AK 99801	1	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Patrick Savland Patrick J. Savland	FV Matilda Bay 7290 Glacier Hwy Juneau, AK 99801	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
John McLean	1310 4th St #6 Juneau 99801		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
LLOYD R. Gowdy Lloyd R. Gowdy	9815-15th NW SEATTLE, WA. 98117		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Daniel Miner	1406 34th St. Anacortes Wa. 98221	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Thomas Cwill	13960 S Wildwood Ln ANACORTES WA 98221	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Les Woodward	P.O. Box 2059 Wrangell AK 99929	2	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 8/14/01

Page 5 of 6

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
DJO David Oeu	Box 2473 Sitka, AK - 99635	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
F.W. Vanderbinder Ed Vanderbinder	3646 S Steelhead Dr. Greenbank, WA. 98253	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
/ Rozelea Gallatin Rozelea Gallatin	3006 Oakes Ave. Anacortes, WA 98221 Boat: Rosalee / Edward Gallatin	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 8/14/01

Page 6 of 6

42

RECEIVED

SEP 19 2001

N.P.F.M.C

The undersigned Homer based Hotels and Motels, which includes every Hotel or Motel in Homer, strongly oppose the Halibut Charter IFQ plan, and are prepared to support any and all efforts to defeat it, including legal action if necessary. We Strongly encourage the NPFMC to recind the Halibut charter IFQ plan at its October 2001 meeting.

Name Business Address/phone

Joe Faulkner	LANDS END RESORT	4786 Homer Spvt Rd	235-6970
Mike McHone MD	HERITAGE HOTEL	147 E Pioneer	235-7787
Dennis Novak	Bay View Inn	P.O. Box 804	235-8485
Michael J. Warburton	Ocean Shores Motel	3500 Crimondan Dr	235-7775
Merlin Cordes	Driftwood Inn	135 W Bennell Ave	235-9019
Rae Smith	BELUGA LAKE LODGE	204 OCEAN DR. LOOP	235-5995
John Smith	Wesend Park	320 W Pioneer	235-9761
Doug Jones	B.W. Bidarka Inn	575 Sterling Hwy	235-8148

43

September 18, 2001

Mr. David Benton
 Chairman
 North Pacific Fishery Management Council
 605 West 4th Ave. Ste 306
 Anchorage, Alaska 99501-2252

RECEIVED

SEP 18 2001

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for the charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

NPFMC

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries. ** the quota has been cut every year.*

Charter IFQ's are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Thank you for your consideration.

Deanna Reeves

Deanna Reeves
 Box 741
 Wrangell, Alaska 99929

Alan N. Reeves

Alan Reeves
 Box 741
 Wrangell, Alaska 99929

Cc: Governor Tony Knowles

Cc: Governor Tony Knowles

Date: Sep. 12TH '01

RECEIVED

SEP 21 2001

N.P.F.M.C

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

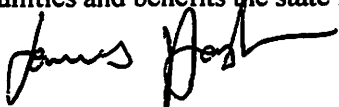
The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,



Name: JAMES HAYDEN

Address: 22500 SE 56TH ST. #31-206, ISSAQUAH, WA 98029.

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

I have been fishing for fifteen years but I am a new owner in the IFQ fishery, and am trying to build up my business. It is tough enough for a new entrant to grow in fishing. Lets leave a future in the industry! Keep the charter IFQ program.

Date: 9.14.01

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: *Lu Jurgelot* Jurgelot

Address: P.O. Box 515 Haines, AK 99827

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

9.14.01

I urge you to support the 2C/3A IFQ program for charter halibut vessels. They are as much a commercial fishery as a "regular" commercial halibut fisherman.
Lu Jurgelot

Date: Sept 6, 2001

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C.

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name:

James R. Hasbun

Address:

Box 486, 704 Rambler, Petersburg AK 99833

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Please don't end what took so long
to establish. JRF

Date: 9/9/01

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

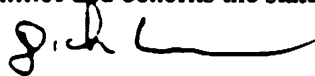
The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.


Sincerely,



Name: DICK CURTAN

Address: P.O. Box 1336 SITKA AK. 99835

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Every one involved in this issue, council members, charter and commercial fisherman have spent most of the 1990's coming to a decision. Everyone has invested huge amounts of time and money. It has been ~~and~~ a fair process. Everyone has had an opportunity to be heard. A decision was made. Lets stand by our decision and move on.
Thanks, Dick 

Date: 9/4/01

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Benny B. Mitta

Address: 123 Dawin Sitka, AK 99835

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

The greedy charter fleet, that is currently out of control, must be brought under the IFQ system like the rest of us. The charter fleet catches an outrageous number of halibut, with many going unreported. Greater than 50% of the charter operators in the Sitka area are out-of-state based and come up in May and go back to Oregon, Washington Sept 1. They bring up their own crews and supplies to avoid local hire and purchases. This is an outrage in itself. At least they should be under IFQ BSM

Date:

Sept 2, 2001

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name:

Richard A. Gussard

Address:

P.O. Box 70, Petersburg AK 99833-0070

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

*THE IFQ CHARTER PROGRAM
IS THE ONLY VIABLE OPTION,
IN MY OPINION.*

Dick G

Date: Sept 5, 2001

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: James H. Bray

Address: 2134 2nd Ave, Ketchikan

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

*I have been a Alaska resident
for 73 years and commercial fished
for over 50 years.
I fully support I.F.Q. for
Charter vessels.*

*Thank You,
James Bray*

Date: 9/10/01

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C.

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Gregory Beam 24th year fishing

Address: Box 1994 SITKA, ALASKA 99835

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

I AM extremely disappointed with the Governor on this issue, I think He is acting way out of line overstepping his own hand picked Council members Decision!

Date: 9-4-01

RECEIVED

SEP 21 2001

N.P.F.M.C

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Ed Jolly

Address: 410 Hugood Rd Tonasket, wa 98855

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

I've commercial fished for 29 years.
We need this fishery to make a
living.

Date: _____

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

RECEIVED

SEP 21 2001

N.P.F.M.C.

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: NESTOR IVANOV

Address: P.O. BOX ANCHOR PT. AK 99556

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

P.S. TO WHOM IT MAY CONCERN
I and my family we are
COMMERCIAL FISHERMAN THAT IS
ALL WE DO I ALSO FISH SALMON
IN THE UPPER COOK INLET DRIFT
FLOOT AND A LOT OF THE PORTION
OF OUR FISH IS GIVING AWAY TO
SPORTS FISHERMAN IF WE LOSE OUR
HALIBUT IFQ. WE WILL HAVE NOTHING,
(YOUR TRULY MATE CHUCK) EFT

Date: Sept 5, 2001

RECEIVED

SEP 21 2001

NPFC

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: David J. Winkler

Address: 14553 Memory Ln, Woodburn Ore 97071

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

my family has been actively fishing since the early 60's, we need to keep the Halibut fishery stable.

Date: 9/12/01

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Mar Vuyf

Address: PO 33497 Juneau AK

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

* Please note I will only support this IFQ only IF the owners will get these IFQ's and not the skippers or the people who lease the boats.

Date: 9-14-01

RECEIVED

SEP 21 2001

N.P.F.M.C

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Wm Connor

Address: Box 1124 Petersburg Ak 99533

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

This charter IFQ program needs to be posted ahead, and instituted. I have been involved in Halibut Longline since 1975. I employ a crew of 5 since the charter explosion of charter vessels my operation can no longer fish traditional grounds, we have had to move further and further from our home port to catch our fish. The charter industry left unchecked with also eliminated my family's ability to catch fish locally. The charter industry needs to be set with a quota so as not to over fish an already fully utilized fisheries. Re-allocation ~~of~~ ^{cost} Commercial Longline quota is wrong. This program passed by the ~~council~~ will allow all groups to grow. Wm Connor

explosion of charter vessels
grounds, we have had to move further and further from our home port
to catch our fish. The charter industry left unchecked with also eliminated
my family's ability to catch fish locally. The charter industry needs to
be set with a quota so as not to over fish an already fully utilized
fisheries. Re-allocation ~~of~~ ^{cost}
program passed by the ~~council~~

Date: 9. 3-4 01.

RECEIVED

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

SEP 21 2001

N.P.F.M.C

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Jeremy Brown

Address: 3217 GREENWOOD AV. BELLINGHAM WA. 98225.

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

P.S. I had to buy my IFQ's, since as a deckhand, I didn't get an initial quota. The increasing charter share takes resource pounds from the quota that I am still making payments on. The April council decision gives the charters windfall enough, let them put their money where their mouths are if they want even more, rather than continue to take from me!

David Benton,

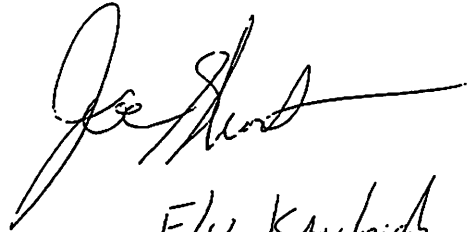
The letter enclosed pretty well covers my feeling on the charter I.F.Q. program. I strongly support the I.F.Q. program for commercial and charter.

This affects me greatly as I have heavily invested in I.F.Q.'s. Halibut and black cod make up 90% of my fishing income. Also my 2 kids have invested in I.F.Q.'s for earning capacity for their college education.

Sincerely,

Date: 9/14/01

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage. AK 99501-2252



FLU Kyleigh ANW

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name:



Address:

Box 1224 Petersburg AK 99833

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

RECEIVED

SEP 21 2001

N.P.F.M.C

Date: SEPT 6, 2001

RECEIVED

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

SEP 21 2001

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

AND MANY OTHER FAMILIES IN THE KAKE COMMUNITY,
My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways. *PLEASE CONSIDER ALL OF THE PRIOR PUBLIC INPUT THAT HAS RESULTED IN THE CHARTER IFQ PROGRAM.*
Sincerely, *→ THANK YOU FOR YOUR TIME + EFFORTS ON THIS MATTER.*

Name: Stu Mack

Address: Box 303, KAKE, AK 99830

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Friday, September 07, 2001

RECEIVED

SEP 21 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in Alaska communities and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in Alaska. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in Alaskan communities and benefits the state in many positive ways.

Sincerely,



Steve Jangaard
5017 168th Pl. N.W.
Stanwood, WA 982192

Copy:
Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Date:

9/21/01

RECEIVED

SEP 24 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: CHRISTOPHER P FRANKLIN

Address: 3401 W. LAWTON ST, SEA WA

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

98199

I DONOT BELIEVE A CHARTER BOAT IFQ
WILL HINDER THE CHARTER BUSINESS. IT
WILL MAKE THIS BUSINESS MORE PROFITABLE
OVER THE LONG RUN.

Date: Sept. 19, 01

RECEIVED

SEP 24 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I am writing to support an IFQ program for charter halibut vessels in areas 2C and 3A.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Continued allocation disputes between commercial fishermen and charter operators commercial create instability in both industries.

Charter IFQs are a long-term market based solution that will allow fisheries management agencies to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Any fixed QS issuance to the charter fleet would violate prudent conservation and is disproportionate in the sharing of conservation burdens. It also aggravates local depletion.

The initial charter QS allocation should be based on 100% of the 1995-1999 average catch (not 125%). This preserves the opportunity for recreational fishermen to harvest halibut at historically high levels.

A charter IFQ is needed to end allocation disputes. In 2000, when the SE charter fleet was constrained by the treaty Chinook cap, they immediately went to court to try and overturn the BOF allocation decision.

If the Council decides to establish a community set aside program, the allocation should come entirely from the charter allocation. The commercial fleet has already paid once for the CDQ program (2% of the quota).

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Brian Castle

Address: Box 243, Craig, Ak. 99921

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

I am also concerned what the charter fleet is doing to the little halibut (under 32") in our area. They come in with an unbelievable amount of little guys.

Dear Mr. Benton. I am sending this form letter as testimony to the Oct. 3 Council Meeting. I have previously testified to the council regarding this matter with personal letters, I believe ~~two~~ two times before. It is difficult, as is, to support our family while my husband is fishing and I am working in Juneau, separated six months of the year, without having to revisit these political issues continuously. I would hope that the facts and testimonies that supported instituting the Charter IFQ's in April will not be over-riden with political pressure. Thank-you for your support.
Rosemary Enferle

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

RECEIVED

SEP 24 2001

Dear Mr. Benton,

N.P.F.M.C

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between

commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Rosemary Enders

*1012 Wee Burn Dr.
Juneau, Alaska
99801*

cc: Governor Tony Knowles

Date: 9/18/01

RECEIVED

SEP 24 2001

N.P.F.M.C

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Chad R. Suits

Address: P.O. Box 1741 Wrangell, AK 99929

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

My family is very dependant on our halibut quotas. It's a big part of our Commercial Fishing income.

Date: 9/18/01

RECEIVED

SEP 24 2001

Mr. David Benton
 Chairman
 North Pacific Fishery Management Council
 605 West 4th Ave. Ste 306
 Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name:

Sharif A. Smith

Address

P.O. Box 1741 Wrangell, AK 99929

Copy. Governor Tony Knowles
 State of Alaska
 PO Box 110001
 Juneau, AK 99811-0001
 Fax (907) 465-3532

We have been commercial fishermen for 23 years and this would harm our already shaken industry. Please do not forget the commercial fishermen.

*Thank-you,
 Sharif.*

Date: 9-17-01

RECEIVED

SEP 24 2001

N.P.F.M.C

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Theodore Rozak

Address: P.O. Box 1475 Homer ak 99603

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

ps. I have fished halibut commercially since 1967 and am now on a IFQ program. I am concerned that while I am limited to a percentage of the total lbs allotted for area 3-A, the halibut charter fleet have no restrictions. I urge you to support the IFQ program for charter vessels.

Date: 9/5/01

RECEIVED

SEP 24 2001

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

N.P.F.M.C

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Our community is totally dependent on

Name:

Elizabeth Coffey

Commercial fishing

Address:

P.O. 8014, Port Alexander, AK 99836

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

RECEIVEDDate: 9/24/01

SEP 24 2001

Mr. David Benton
 Chairman
 North Pacific Fishery Management Council
 605 West 4th Ave. Ste 306
 Anchorage, AK 99501-2252

N.P.F.M.C.

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Paula KeohaneAddress: 35555 Spur Hwy PMB 290 Soldotna, AK

Copy: Governor Tony Knowles
 State of Alaska
 PO Box 110001
 Juneau, AK 99811-0001
 Fax (907) 465-3532

I trust that you will take the time to fully understand the statements in this letter, free of the considerable political pressure which knows no logic.
 Thanks,
 Paula

Received 44 copies of this form letter with signatures. See Secretary to review.

Date: 9-7-01

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave. Ste 306
Anchorage, AK 99501-2252

RECEIVED
SEP 10 2001
N.P.F.M.C

Dear Mr. Benton.

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: ERIC Norman - gen mgr. Taku Fisheries
Address: 550 S. Franklin St. Juneau AK 99801

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

INADVERTENTLY OMITTED FROM
COMMENTS PACKET

Steve Fish and Kari Johnson
P.O. Box 6448 Sitka, Alaska 99835

Mr. David Benton
Chairman
North Pacific Fisheries Management Council
Anchorage, Alaska

Re: Areas 2C/3A charter halibut IFQ

Dear Mr. Benton,

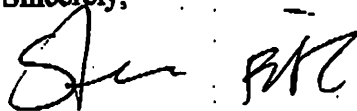
I am writing to ask you to continue to support the charter halibut IFQ program adopted by the council in April 2001. I am a halibut longliner. I am a provider of access to the halibut resource for the greater public who relies on the longline fleet for the halibut on their table.

The Council has had the benefit of extensive analysis, copious public comment and much deliberation on the subject of halibut charter fisheries management. To reconsider previous Council action without substantial new information is redundant, wasteful of Council resources and an insult to all the people who invested so much time in producing a solution to the dilemma of continued, unregulated charter industry growth.

It is irresponsible of the Governor of Alaska to attempt to rescind this action without any other management alternatives offered. Take note of the state of the charter GHIL still stuck in Juneau years after being approved by the Council. What is offered to replace management measures which the Governor has been talked into getting rid of? And will the sport-fish lobby support any responsible limit to halibut charter industry growth?

I urge you to continue supporting the halibut charter IFQ program. Thank You for your thoughtful consideration of this rather persistent problem.

Sincerely,



Steve Fish

Cc: Governor Tony Knowles

RECEIVED
SEP 25 2001
N.P.F.M.C.

Executive Director
James A. Donofrio



Legislative Director
Sharon I. McKenna
Membership Director
Susan J. Heinrichs

October 2, 2001

Mr. David Benton, Chairman
Council Members
North Pacific Fisheries Management Council
605 West Fourth Ave., Ste 306
Anchorage, AK 99501

Dear Mr. Benton and Council members:

This statement supports a motion to rescind the Council's action to approve an IFQ program for the halibut charter fishery. This letter supplements testimony submitted to the Council by the Recreational Fishing Alliance in January and April 2001. RFA is one voice, representing thousands of anglers who reside inside and outside Alaska, but who spend money in Alaska. RFA has 75,000 affiliated members and 25,000 dues-paying members – 100,000 in all.

I. The Halibut Charter IFQ program violates the Moratorium on IFQ programs.

Forwarding the halibut charter IFQ program to the Secretary of Commerce will violate the moratorium on new IFQ programs. In 1996, Congress imposed a moratorium on any new IFQ program. Congress amended the Magnuson-Stevens Fisheries Conservation and Management Act to bar any Council from submitting "any fishery management plan, plan amendment, or regulation . . . which creates a new individual fishing quota program."¹ This charter IFQ program is a new plan, and the moratorium applies.

¹ 16 USC 1853(d)(1)(a).

1/ The charter IFQ program is a new plan, not an amendment of the commercial halibut/sablefish IFQ program.

In its February ²⁰⁰¹~~2000~~ *News and Notes*, the Council described the halibut charter IFQ program as a “regulatory amendment to the current halibut IFQ program.” This is consistent with the title of the staff analysis, “Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for a regulatory amendment to incorporate three halibut charter sectors into the halibut individual fishing quota program or implement a moratorium on entry into the charter fleet for Pacific halibut in Areas 2C and 3A.” This characterization cannot be accurate – this is a **new** IFQ program.

In 1993, NMFS established an IFQ program for the commercial halibut longline fishery.² That rule, developed by the NPFMC, stated, “this IFQ program will govern all commercial halibut fishing throughout the range of Pacific halibut in and off Alaska.”³ The NPFMC’s charter halibut IFQ program would be imposed on “charter fishing,” not “commercial fishing.” These terms are separately defined under the statute.⁴

The two fisheries are inherently different. **Anglers** have the right to catch the fish harvested within the charter fishing industry. Charter boat owners have no right to the fish caught on their boats. Nevertheless, the proposed charter IFQ program would give those rights to **charter boat owners**.

The commercial “IFQ” is defined as the annual catch limit for harvest by a person lawfully allocated a harvest privilege for a specific portion of the total allowable catch of halibut.⁵ Since a charter fisherman does not “harvest,” how can he hold “IFQs” under the existing program?

The halibut charter IFQ program addresses a different kind of fishing, a different kind of fisherman and a different kind of commercial activity. It does not address the concerns that lead to the commercial IFQ program – safety of the fishermen, quality of the fish in the market for consumers, conservation of the resource.

² 58 Fed. Reg. 59375.

³ 58 Fed. Reg. at 59377 and 59380.

⁴ The Act defines “commercial fishing” as “fishing in which the fish harvested, either in whole or in part, are intended to enter commerce or enter commerce through sale, barter or trade.” 16 USC 1802(4). In contrast, it defines “charter fishing” as “fishing from a vessel carrying a passenger for hire . . . who is engaged in recreational fishing.” 16 USC 1802(3).

⁵ 50 C.F.R. § 676.11.

2/ The Alaska halibut fishery is not exempt from the moratorium.

The halibut fishery in Alaska is managed by the International Pacific Halibut Commission (IPHC), as authorized by the Halibut Act.⁶ The Halibut Act authorizes the Regional Fishery Management Councils to develop regulations to implement the Halibut Act within the U.S. halibut fishery. The Magnuson-Stevens Act, however, created and funds the Councils. The Councils would not exist outside the MSA.

With regard to any action "to allocate or assign halibut fishing privileges," the Halibut Act states: "such allocations shall be . . . based upon the rights and obligations in existing Federal law." The North Council cannot ignore that provision of "existing Federal law" which imposes a moratorium on new IFQ programs.

Even without this direct reference within the Halibut Act itself, the language of the Magnuson-Stevens Act, actions taken by or on behalf of the Council and statements on the floor of Congress confirm the application of the moratorium to the halibut fishery.

- The moratorium provision in the MSA refers to halibut. It states the moratorium "shall not be construed to prohibit a Council from submitting . . . amendments to the North Pacific halibut and sablefish" IFQ programs.
- In 1996, on the floor of Congress, Senator Stevens said, in support of the moratorium, "The largest IFQ program went into effect last year in the halibut/black cod fisheries off my State of Alaska. . . IFQs . . . were not even dreamed of when we first passed the Magnuson Act. Unlike other limited entry systems, IFQs allow the potential consolidation of fishing efforts in a fishery. . . . [This] has potential negative and other unknown effects. . . . Our Senate bill puts a 4-year moratorium on both transferable and nontransferable IFQs. We just do not have enough information yet, Mr. President, to decide what limitations ought to be put on the IFQs, if any. We need facts, and we need a study. (Copy attached.)"
- The subsequent report to Congress (*Individual Transferable Quotas in Fishery Management* (Sept. 1995)) included an extensive review of the Alaska commercial halibut IFQ program. It noted many public policy issues, such as initial allocation; private property rights and the difficulty in terminating any IFQ program; transferability; barriers to entry into the fishery; and enforcement. It urged, "The halibut and sablefish IFQ program will provide essential new information about program design to address regional concerns."

⁶ Also, the Convention between the United States and Canada for the Preservation of the Halibut Fishery of the Northern Pacific Ocean and the Bering Sea.

- Clarence Pautzke, Executive Director of the North Council, presented a report to the National Research Council in September 1997, *Development of the Individual Fishing Quota Program for Sablefish and Halibut Longline Fisheries off Alaska*. In that report, Mr. Pautzke set forth the public policy issues that the NRC should review with regard to IFQs a tool in fisheries management.

We note that, with regard to recreational fisheries, he stated,

The socio-economic characteristics of a fishery, including participation by . . . charter and recreational sectors will likely prove more difficult, in terms of defining a set of criteria upon which to determine IFQ management 'appropriateness.' It is not a straightforward exercise to even define the existing socio-economic structures; projecting the impacts to that structure is even more difficult. However, for our current program as well as any future IFQ program, this is probably the most critical set of factors to consider. . . A set of guidelines should prove very helpful to future considerations of IFQ programs around the country.

Furthermore, he commented on the amount of time and effort it had taken to implement, monitor and enforce the commercial halibut and sablefish IFQ program:

With limitations on personnel and funding, these concentrated efforts on the IFQ program have tended to distract from the needs of other ongoing management programs.

- In a May 14, 1997 letter to James Baker, Under Secretary and Administrator, NOAA, in reference to the "sablefish and halibut," Richard Lauber, then chair of the North Council, stated, "[O]ur IFQ program is the largest such individual quota program in the United States. It is certain to be a centerpiece of the National Research Council's evaluation mandated in recent revisions to the Magnuson-Stevens Act."

Congress imposed the moratorium to allow no new IFQ programs until Congress had time to give the Councils direction on these and other policy issues, such as transferability, allocation and processor shares. The North Council can expect Congress to provide guidance on key policy issues:

- Are IFQs appropriate for recreational fisheries, AT ALL?
- Should they be transferable?
- Who should hold the IFQs (the public? boat owners? license holders?)?
- Should IFQs sunset? Under what circumstances should the IFQ expire and go back into public ownership?

II. Executive Order 12962 directs the Council to enhance recreational fishing.

Executive order 12962 was issued by then President Clinton in June 1995. That order directed all Federal agencies to enhance recreational fishing opportunities and to evaluate and document the effects of any Federal action on recreational fisheries. In response, the National Marine Fisheries Service developed a Recreational Fisheries Resource Conservation Plan, the goal of which is to "Provide for increased recreational fishing opportunities nationwide."

Within NOAA, the Office of Intergovernmental & Recreational Fisheries has been established to "provide a forum" at the national level to allow "interaction" between NMFS and the marine recreational fishing community, "working to provide for increased marine recreational fishing opportunities."⁷ The number one listed purpose of this office is to "communicate with the public to determine the needs of all interested parties concerning intergovernmental and marine recreational fisheries issues."

The Council acknowledged in its February 1997 newsletter it would need to expand its review and discussion of how alternative management methods related to EO 12962. However, we see no evidence of any analysis within the proposed halibut charter IFQ program of the EO or its policy goals. Generally, we see little evaluation or documentation of potential impacts on the recreational halibut fishery.

III. The halibut charter IFQ program will hurt the recreational angler.

The halibut charter IFQ program will eliminate the Council's ability to preserve this public resource for the recreational anglers who rely on charter vessels to access the fishery. We believe anglers are going to be hurt.

Now, the Council allocates a specific portion of the total allowable catch to charter boat anglers. The proposed charter IFQ program could, ultimately, give the charter boat IFQ holders the power to sell their IFQ to the commercial sector. Thus, THEY could determine the allocation to be reserved for the angler, to the detriment of the public user. After three years, up to 25% of the charter IFQs "may" be transferable to the commercial sector (upon Council review and approval.) The IFQ program could lead to a transfer of allocation from the recreational fishing sector to the commercial fishing sector.

There will be a potential loss of access immediately upon implementation of the program. Charter halibut IFQ holders will be able to lease up to 10% of their quota to the commercial sector.

⁷ www.nmfs.noaa.gov/irf/irf.html

More opportunities for public input during the development and consideration of the halibut charter IFQ program would have allowed the Council to meet the goal of the E.O., better informed the Council and, perhaps, have changed the ultimate decision. Every person who testified in favor of the IFQ program either already had one (commercial fishermen) or wanted one (Charter boat captains who would receive quota share). We have heard an estimate that \$25 million of public resource will be given away, with no value returned to the recreational fishermen.

We understand that NMFS may have initiated a study to collect baseline economic data of the charter fishing sector in May 2001 – AFTER the Council acted -- in an effort to measure potential impacts of the IFQ program. We understand that the Pacific States Marine Fisheries Commission was asked to conduct a telephone survey, to initiate this study. This study should be completed before ANY action is taken to restrict the charter fishery.

IV. There is no need for an IFQ program in the halibut charter fishery.

The charter halibut catch remains 14% below the GHL level in Area 3A and 21% below the GHL in Area 2C. There is no need to restrict the charter fishery.

We know that 47,000 Washington and Oregon anglers bought fishing licenses in Alaska last year. We know that as late as September 1996, the Council newsletter told these people there would be no IFQ program for the charter fishery. We believe the recreational fishermen of Alaska, Washington and Oregon and throughout the United States remain unaware of the potential charter IFQ program and its impacts on their fishing opportunities. RFA considers awarding IFQs to charter boat owners to be a Gettysburg for the salt water angler. We will oppose this action at all levels.

We strongly urge the Council to rescind the action taken in April.

Sincerely,

RECREATIONAL FISHING ALLIANCE

Susan E. Reeves for

James A. Donofrio
Executive Director

I hope that this bill will bring a stop to this inexcusable amount of waste.

This bill also addresses the divisive issue of individual fisheries quotas, the so-called IFQ's, or CTQ's.

The 'individual fishing quota' as defined in S. 39 means both the transferable and nontransferable quotas that are known as IFQ's. We place a moratorium on new IFQ programs until September 30 in the year 2000.

In the meantime, the National Academy of Sciences will study IFQ's with the Secretary of Commerce, the councils, the regional councils, and two regional working groups to address many unresolved issues.

There are only three IFQ plans in our Nation today. Two of them are on the east coast: the wreckfish IFQ program and the surf clam IFQ program.

The largest IFQ program went into effect last year in the halibut/black cod fisheries off my State of Alaska. The Alaska program involves almost 100 times as much fishing vessels as the two east coast programs.

IFQ's are a new tool that we did not even consider in 1990, the last time we reauthorized the Magnuson Act. They were not even dreamed of when we first passed the Magnuson Act.

Unlike other limited access systems, IFQ's allow the potential consolidation of fishing efforts in a fishery. This characteristic may provide a useful tool to allow the market to drive a reduction in fishing capacity when needed, Mr. President. However, it has potential negative and other unknown effects.

We are worried about the new level of capital requirements of IFQ's. We are worried that fisheries will become investor owned totally under IFQ's and not the family traditional fishing that has been the hallmark of America's fisheries. We are worried about the impact of IFQ's on the fishing communities themselves. And we are worried about foreign control of IFQ's, once they are established, and the fisheries themselves if a rigid U.S. ownership standard is not set for them.

In other words, we Americanized the system. And, now, if we really let IFQ's go unrestrained, we could really end up with more ownership of the IFQ's and destroy the whole purpose of the Magnuson Act to create an Americanized zone within which we would protect our fisheries and have a conservation ethic to be the major goal of the Magnuson Act.

The Magnuson Act, this bill, would permanently ban transferable IFQ's in the House version that we received. That was H.R. 39.

Our Senate bill puts a 4-year moratorium on both transferable and nontransferable IFQ's. We just do not have enough information yet, Mr. President, to decide what limitations ought to be put on the IFQ's, if any. We need facts, and we need a study.

I believe the House will agree with this approach, Mr. President.

The academy's IFQ report will be due in the year 1998, one year before the next reauthorization of the Magnuson Act.

TED STEVENS ALASKA, CHAIRMAN

THAD COCHRAN, MISSISSIPPI
 ARLEN SPECTER PENNSYLVANIA
 PETE V. DOMENICI, NEW MEXICO
 CHRISTOPHER S. BOND, MISSOURI
 SLADE GORTON, WASHINGTON
 MITCH MCCONNELL, KENTUCKY
 CONRAD BURNES, MONTANA
 RICHARD C. SHELBY, ALABAMA
 JUDD GREGG, NEW HAMPSHIRE
 ROBERT P. BYRNES, UTAH
 BEN NIGHTHORSE CAMPBELL, COLORADO
 LARRY CRAIG, IDAHO
 KAY DAILEY HUTCHISON, TEXAS
 JON KYL, ARIZONA

ROBERT C. BYRD, WEST VIRGINIA
 DANIEL K. INOUE, HAWAII
 ERNEST F. HOLLINGS, SOUTH CAROLINA
 PATRICK J. LEAHY, VERMONT
 FRANK R. LAUTCH, NEW JERSEY
 TOM HARKIN, IOWA
 BARBARA A. MIKULSKI, MARYLAND
 MARY M. BLUNT, MISSOURI
 HERB KOHL, WISCONSIN
 PATTY MURRAY, WASHINGTON
 BYRON L. DORGAN, NORTH DAKOTA
 DIANNE FEINSTEIN, CALIFORNIA
 RICHARD J. DURBIN, ILLINOIS

STEVEN J. CORTESE, STAFF DIRECTOR
 JAMES H. ENGLISH, MINORITY STAFF DIRECTOR

United States Senate

COMMITTEE ON APPROPRIATIONS
 WASHINGTON, DC 20510-8025

Sisk-57609

May 21, 2001

The Honorable Tony Knowles
 Third Floor, State Capitol
 P.O. Box 110001
 Juneau, Alaska 99811-0001

RECEIVED
 MAY 29 2001

GOVERNOR'S OFFICE

Dear Governor Knowles,

Thanks for your letter regarding the North Pacific Fishery Management Council's decision to allocate individual fishing quotas in the halibut fishery to charter vessel captains.

One of my main goals in helping to create Regional Councils was to give Alaska control over the 197 miles beyond State jurisdiction (the three mile zone is controlled by all States under traditional common law and the Submerged Lands Act). Regional Councils nominated by Governors and appointed by the Secretary of Commerce offered us an opportunity to assert control over the fish species off our shore, subject only to review by the Secretary of Commerce.

Since the Magnuson-Stevens Act was enacted, I established a policy here in the Senate of not interfering in Council actions. Similarly, I have tried not to interfere with the Secretary's power to countermand a Council decision. This, in my judgment, is consistent with my role as Senator, author of the Magnuson-Stevens Fishery Conservation and Management Act, and continued protector of the Council concept and regional fisheries management authority. My involvement as a Federal official in Council decisions would defeat the very purpose of regional management.

Only if the Council knows it will bear the burden of decision will it really weigh every action it takes. The Secretary's role ought to be severely limited; otherwise, the individual customs and policies of our region will be forced back into a "one size fits all" set of management rules devised by Commerce Department agencies. As a former Council member, I hope you appreciate my position.

The Honorable Tony Knowles
May 17, 2001
Page 2

Your role as Governor is different - you participate in Council decisions through the State's voting seat and the appointment process.

I will continue to follow this issue with interest in the belief that its resolution will benefit both Alaskans and the resources we all seek to protect and preserve.

With best wishes,

Cordially,



TED STEVENS



TONY KNOWLES
GOVERNOR
governor@gov.state.ak.us

STATE OF ALASKA
OFFICE OF THE GOVERNOR
JUNEAU

P.O. Box 110001
Juneau, Alaska 99811-0001
(907) 465-3500
Fax (907) 465-3532
www.gov.state.ak.us

April 25, 2001

The Honorable Ted Stevens
United States Senate
522 Hart Building
Washington, DC 20510-0201

Dear Senator Stevens:

I am writing to advise you of my strong opposition to the North Pacific Fishery Management Council's (Council) April 14 decision to manage sport charter vessels under an individual fishing quota (IFQ) program for Pacific halibut in Alaska waters. In addition, I would like to solicit your opinion on the question of whether the Council's decision violates relevant provisions of the Magnuson-Stevens Fishery Conservation and Management Act.

The State of Alaska, including myself as Governor, the legislative leadership, and the Alaska Board of Fisheries, does not support adoption of the IFQ program for Alaska's recreational charter fleet and will officially appeal these regulations to the Secretary of Commerce if they are put forward. My letter to the Secretary on this subject is enclosed for your information.

There is no IFQ program for a sport fishery in the United States. An IFQ program for recreational halibut charter fishing transfers a public resource through a quota share program to private individuals in the charter industry without any compelling reason to do so.

In the alternative, the state supports the implementation of the guideline harvest level (GHL) regulations adopted by the Council in February 2000. In addition to harvest restrictions when the charter halibut harvest exceeds the GHL threshold, we also recommended the implementation of a moratorium on new entries into the charter fishery for halibut. This would be coupled with the development of local area management plans that address localized depletion, user group conflicts, and other social and allocative issues.

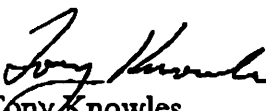
The Honorable Ted Stevens
April 25, 2001
Page 2

With these considerations in mind, I would very much appreciate your thoughts, as a drafter of the Magnuson-Stevens Act, on a couple of questions which will be germane to any appeal that we file with the Secretary of Commerce. It seems to us that the North Pacific Fisheries Management Council is recommending the creation of a new IFQ program in violation of the moratorium on IFQs in current federal law. Contrary to arguments made in defense of the Council's action, we do not see this as a simple extension of an existing IFQ program. Further, as indicated previously, we think the problem is exacerbated by the unprecedented decision to extend IFQs to a sport fishery.

Your analysis of these matters would be most helpful to us in marshalling our arguments for the next phase of the review process. I would also urge you to advise the Council and the Secretary of your opposition to the halibut decision.

Thank you for considering my position on this important matter and for your thoughts on the issues raised by the Council's recent action. Please contact me or my staff if you would like to discuss this further.

Sincerely,


Tony Knowles
Governor

Enclosure

cc: The Honorable Frank Murkowski
The Honorable Don Young

Background of Council Decision on Halibut Charter IFQ

In April 2001, the NPFMC voted 8-3 to include halibut charter under the existing IFQ program. Consistent with other Council actions, the process of resolving the allocation issue between commercial and charter was done incrementally in a comprehensive process starting in 1993, continued with the adoption of the GHL, and finally resulted in the charter IFQ program. The problem statement addressed by the Council in April was long term resolution of allocation conflicts as well as overcapitalization in the guided sport sector. These issues were not addressed in the GHL decision.

In regard to GHL and IFQs, the SSC has stated, *"Finally, the SSC would be negligent if it failed to warn the Council that the preponderance of evidence from fisheries in the North Pacific and other regions suggests that allocations between user groups are unlikely to be definitively settled by a single allocative decision [GHL]. Allocation battles are reopened whenever a set of stakeholders believes that their negotiating position has improved.IFQs are a mechanism that would shift this burdensome reallocation battle out of the Council chambers, and into the market place."*

When would allocation conflicts occur? When the GHL is reached and the management measures become constraining. As an example, this has frequently occurred in the sport/commercial allocation issue in the SE Alaska king salmon fishery. The GHL would be reached due to growth in the charter harvest, a decline in halibut biomass, or both.

What is the potential for growth in the charter fishery? It is an open access fishery with excess capacity that is increasing. The number of registered vessels was 1258 in 1998 and 2079 in 1999. The number of active participants was 1085 in 1998, 1137 in 1999, and 1204 in 2000. A large amount of the harvest is caught by a small number of vessels. Many vessels do not operate at full capacity. However, the client base for the fishery is expanding. 94% of the 2-C clients and 64% of the 3-A clients are visitors. The annual number of visitors to Alaska is increasing at 3% a year.

What is the potential for a decline in halibut abundance? The IPHC predicts a lower exploitable biomass for the next five years.

What were the main elements of the charter IFQ program? The program is an access privilege and not an ownership right. It includes: 1.) A generous allocation in excess of catch history (+125%); 2.) Provides for transfer of quota share between charter and commercial sectors; 3.) 75-100% of the initial issuance quota share is non-transferable to the commercial sector, and; 4.) establishes a community set-aside.

Was there an adequate public process? The Council public process on this allocation issue spans eight years and sixteen meetings with three opportunities for public testimony at each meeting. The issue was scheduled largely in Anchorage in order to assure public participation. There were three public committees established. Specifically, charter IFQs were on the Council agenda for five meetings with multiple public meetings of the Charter IFQ Committee. A poll at the time of final action in April indicated that in the Anchorage area, 68% of the public were aware of the issue. There was little participation by resident anglers at the April meeting in Anchorage.

Why didn't the Council select a moratorium? Unlike IFQs, a moratorium does not address long term allocation. A moratorium may address overcapitalization but dependent upon the criteria. However, due to the considerable turnover in the fishery, it is difficult to design a moratorium that wasn't either overly restrictive or completely unrestrictive. Between 1998 and 1999, participation grew 5% but the actual participants changed by 50%. Between 1998 and 2000, participation grew 11% and actual participants changed 80%. These parameters make for an unworkable moratorium. Additionally, rural areas with underdeveloped charter fleets opposed an area-wide moratorium.

Why didn't the Council select LAMPs instead of IFQs? LAMPs (Local Area Management Plans) do not address allocation nor do they have the authority to do so. LAMPs do not address issues on a regional scale such as 2-C/3-A. LAMPs are best suited for a specific local problem such as local depletion. The LAMP process is a slow consensus process that best works with a small group of representatives with an agreed upon specific problem of a local nature. Consensus is extremely unlikely to be achieved in large geographic areas with large groups of representatives addressing contentious allocation issues. There is only one LAMP currently in place (Sitka). LAMPs and IFQs address different issues and are complementary. The IFQ program does not preclude LAMPs.

What were the dissenting views expressed in Council deliberations?

- The charter fishery is not likely to grow. **Response:** ADF&G first stated this in 1993, since then the charter harvest has doubled. See previous section on growth potential (excess capacity, visitor increases, etc.).
- The GHL will be adequate. **Response:** History teaches otherwise. See previous SSC comments as to a single allocation decisions.
- A moratorium with LAMPs is adequate. **Response:** Does not address allocation. See previous discussion of moratorium and LAMPs.
- “Privatization” of the resource. **Response:** This is a vague philosophical argument that is unsubstantiated. IFQs are an access privilege, not an ownership right. The public accesses the halibut resource by buying it at the market place; as unguided anglers; and as guided anglers. Charter operators may not sell their fish and the client has full rights to the catch.
- Possible increase in charter costs to the angler. **Response:** This is unsubstantiated by the analysis which concluded the just the opposite, that costs would be less under IFQs than the GHL.
- Safety concerns. **Response:** USCG indicated that IFQs would promote a more stable professional charter fleet.

What is the present State of Alaska position? The State of Alaska (9/20/01) believes “...*the GHL program may be adequate to address future growth in the harvest of halibut in the charter fishery.*” This is contrary to history and the stated expectation of the SSC. In acknowledging the potential for future growth, the State of Alaska also endorses adopting a moratorium (type: unspecified) and an expedited LAMP process. There is no substantive change between the State’s April 2001 and September 2001 position. There is no new information provided as a basis for a rescind motion.

Was there adequate public process in developing the State of Alaska position? There were no public stakeholder meetings held by the Governor’s Office or ADF&G. There were no public meetings by the Board of Fisheries. There were no legislative hearings.

Behnken
123 Riggs Rd
Sitka, AK 99835

North Pacific Fishery Management Council
605 West 4th Avenue, Ste. 304
Anchorage, AK 99501

October 1, 2001

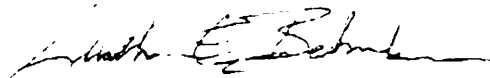
Dear All,

I am very sorry to be missing yet another Council meeting and retirement party, but at least this time I will be thinking of you, and hoping that you are enjoying yourselves (I couldn't spare much thought for you in September!). I am especially sorry to be missing Bob's retirement's party, and am counting on you to thoroughly embarrass him with speeches of praise and love. Would someone, or maybe everyone, please give him a hug and a kiss from me??

Besides letting you know that I am missing you all, I am taking time out from playing with baby Hahlen to remind you that on this halibut charter issue I am out of sight but hopefully not out of mind. Please remember all the years of work, education and compromise that has gone into developing a comprehensive halibut management plan. As a Council, we addressed commercial, charter and subsistence issues, working hard to balance the concerns of all who rely on this great flat fish. In April we approved the charter quota share program after much deliberation, recognizing that it provided the most comprehensive solution to the identified problems. I know that I am not telling you anything new, but those who are calling for reconsideration also are not providing you with anything new--no new information, no new alternatives, and no solutions. Given this absence of new information or more appropriate solutions, there can be no justification for rescinding the Council's previous action--except, of course, political gamesmanship and an attempted coup by my buddy Bob Penny. The North Pacific Council has a long history of refusing to bow to this kind of political pressure, a history of which we are all proud. Our Council bases decisions on facts. I do not expect any deviation from that course now. Please do not let me down.

I know you have a long week ahead of you and will no doubt listen to hours of testimony on this issue alone, so I will keep these comments brief (I know that is out of character for me!) I will be thinking of you, and anxiously awaiting the phone call relaying details of the vote. Thank you for indulging me. Have a productive week, and please remember to hug Boo Maca for Hahlen, Kent and me.

Sincerely,



Testimony of
Jev Shelton
to the
North Pacific Fishery Management Council
regarding
Charter Vessel Halibut IFQ
October 3, 2001

Mr. Chairman and Council Members;

I am Jev Shelton. I fish commercially out of Juneau, which has been my homeport for the past 31 years. Long-lining for halibut is a significant part of my fishing business. My comments are addressed to you on behalf of the Halibut Coalition.

Unfortunately, the topic before the Council once again is the halibut charter IFQ program that was passed by the Council in April of this year. At the outset I want to remind the Council that its IFQ action drew broad support from all of the affected constituencies, most notably including both charter operators and long-line fishermen. With that support still in mind, I wish to comment briefly on a series of points related to the charter IFQ issue.

1. No plausible rationale has been offered for the move to rescind the Council's April, 2001 passage of the IFQ program. That action represented the culmination of at least eight years of information and public input to the Council and of analysis and deliberation by the Council. By any standard, the potential alternative actions relative to the charter halibut issue have been reviewed thoroughly and an informed decision taken. The proposition now is to take back that decision. Proposing to rescind the IFQ program under present circumstances is in itself cause for public concern. That program passed the Council by an 8-3 margin. No new information or analysis has been generated in the interim. Appointment of new Council members represents the only change in circumstance. Thus, those new members are in the untenable position of determining whether to negate a recent Council decision on an issue on which they are, at best, not fully informed.

The credibility of this Council and its process are at stake here. This Council's prior record has been excellent for working through fishery resource issues on the basis of the best available scientific and economic information and analysis. Its recommendations generally have been implemented and respected. That result follows from adherence to a deliberative process that is broadly publicly informed and that captures the data and policy elements of solutions that are uniquely appropriate to the Alaska region. Undoubtedly key to that success is the freedom from the taint of capricious political influence on its recommendations. For this Council now to reverse itself, without any, let alone compelling, new substantive input, would cast serious doubt on its standing as a reliable source of reasoned recommendations. By rescinding its decision on charter halibut IFQ under these circumstances, this Council would jeopardize its standing both in this region and nationally. The integrity of its process and resulting recommendations on this and subsequent issues would encounter vastly increased skepticism or outright cynicism. Without public trust in the soundness and political independence of its actions, the Council cannot be productive or effective. That trust is now in serious jeopardy.

2. Turning to substantive issues regarding the charter IFQ program, a policy perspective was expressed by charter IFQ opponents during the Council's April deliberations. That point of view, while it did not prevail, is instructive with respect both to the effort to reverse approval of the IFQ solution and to the underlying view of the Guideline Harvest Level (GHL) alternative that at least some opponents of charter halibut IFQ advocate.

The stated perspective held that commercial (long-line) harvest should rank lowest among the various uses of the halibut resource. By-catch in other fisheries and all segments of personal use and recreational fisheries should stand as higher priorities in allocating the annual allowable harvest of halibut. Specifically, the directed commercial fishery should be restricted annually to whatever is left after removals in all other fisheries are accounted.

This perspective is worthy of note in order to make two points. First, as a matter of public policy, it seems particularly difficult to justify a conscious erosion of the established long-line fishery, which is a significant element of the economic fabric of Alaska's coastal communities, in favor of a newly developing recreational fishery. It should be noted that the economic importance of the commercial halibut fishery has increased greatly for all of the coastal regions as the salmon and herring fisheries have experienced significant downturns in recent years. Expansion of charter halibut harvests unequivocally is related to increased non-resident tourist clientele (well over 90% in Area 2C, nearly two-thirds in Area 3A). Thus, fishing for the "experience" or for trophy, not "personal use" in the ordinary sense of that term, forms the basis for much of the charter fishery. Advocating the priority of this guided recreational fishing places use of the halibut resource for entertainment, for play, by affluent non-resident anglers over its use as a continued source of income for existing, very dependent small fishing businesses or its place as a valuable commodity for consumers worldwide. Such a policy view is hard to rationalize and difficult to imagine as commanding general support in this Council.

Second, implicit in assertions of recreational priority over commercial harvests of halibut is the fundamental motivation for opposing the charter IFQ program. The Council's IFQ

program is threatening to this perspective precisely because it entails an effective limitation on guided sport halibut fishing. It does not provide a ready route for continued gratuitous reallocations of harvests from the commercial long-line to the commercial guided-recreational sector. The obvious flaw in the previously approved GHL approach was that it would, at best, provide only temporary relief. Renewed pressure on the Council to increase charter allocations was inevitable whenever the GHL was approached or exceeded. It was recognized that the allocation battle simply would not end. It would, in fact, only get worse. The obviousness of this difficulty for the future of the Council and for the involved fishery interests was one of the primary reasons for the Council's subsequent endorsement of the IFQ program.

Criticisms based on various specious allegations have been leveled at the Council's IFQ system. Those allegations have formed the pretext for demanding the rejection of the IFQ approach. In retrospect those portrayals can be seen as little more than rhetorical red herring intended to elicit emotional outbursts on the issue without overtly addressing the long-term allocation objectives of IFQ opponents. For example, it has been asserted that IFQs are tantamount to privatizing a public resource. Since participation as a charter operator remains a revocable privilege, since the operator cannot sell any part of the catch in the market or to a client, since the successful recreational client has full rights to any retained halibut, since the charter fleet is not a closed class but has a ready mechanism for the entry and exit of participants, and since all of these features are prominent in the Council's IFQ program, "privatizing" the halibut resource remains nothing more than a hot-button word for stirring opposition. It is wholly devoid of substance. Similarly, the claim that the charter IFQ system will hinder access to personal use halibut by Alaskan resident anglers is without basis (see 3. below). The real opposition is not tied to these unwarranted allegations and does not derive generally from charter operators. Opposition is to any action that appears likely to be effective in curtailing the continued unrestricted expansion of guided recreational fishing.

3. A real irony in this debate attends the emphasis placed by IFQ opponents on access by resident anglers to halibut for personal use. They assert that establishing a charter IFQ system or, really, any long-term limitation on the charter fishery will in some manner hinder that access. In truth, the rapid development of the charter fishery has greatly increased the difficulty for unguided, resident fishermen to harvest halibut near communities with active charter fleets. This already has evolved into local restrictions on charter activities in Sitka Sound. Other communities certainly will pursue similar solutions. Additionally, it is clear that localized depletion of the halibut resource does occur. However, such depletion is to be observed only in those locations where an intense charter fishery takes place over extended periods, locations such as the Homer, Sitka, or Juneau vicinities. In these instances, the local, unguided personal-use fishermen suffer the primary impact of competing with the commercial charter fleet. Any subsequent increase in levels of charter effort will only exacerbate the situation, not improve access to halibut for personal use. In this light, the 25% premium to the charter fishery over previous harvest levels will only increase localized depletion and pressure on the halibut resource near those communities that have the greatest historical use by and the greatest current demand for unguided recreational harvest of halibut.

4. In contrast to a GHL approach to halibut allocation, implementing the IFQ program will generate a critically essential result. It presents a permanent resolution to the struggle for allocation of halibut between the charter and long-line fleets. Once initial allocations and rules for transfer of quota between the sectors are implemented, the IFQ program will function as a self-regulating economic system as it has already in the long-line fleet. As with the initial quota allocation, the charter fleet is received a premium in that long-line quota can be purchased into that fleet. Reciprocal transfer into the long-line fleet will be prohibited for at least three years and will be significantly limited if and when it may be authorized in the future. The one-sided nature of this arrangement is a concern, but at least in this system any further transfer of long-line quota to charter quota will occur as a transaction under agreed terms. Any future transfer of quota from charter to long-line will require the same level of agreement. Agreed transactions are the essential element in assuring a permanent solution to this longstanding problem. The economic circumstances of the respective fleets at any given time will govern the flow of harvest levels between them within the overall annual harvest quota. In this manner the IFQ system will avoid the renewed, bitter allocation conflict in the Council forum that is inevitable from a GHL-type approach. Once the IFQ program is functioning, halibut allocation should appear before the Council only for program review, not for regulatory action.

5. Certainly one of the most compelling reasons for adopting the IFQ program stems from its implications for improving fishery management of the halibut resource. With the long-line and charter fisheries accounting for nearly all harvest in directed halibut fisheries, it only makes sense to bring them under an integrated management regime. This means employing fishery assessment techniques and analytical procedures that are as much in common as is possible. Simply fixing the charter quota to specified percentages of the total annual Area 2C and 3A allowable harvests accomplishes that integration. Most important, the charter fishery will thus be incorporated into the abundance-driven management system that successfully governs the long-line fishery. Both charter and long-line quotas will rise and fall with the measured status of the halibut resource. Also, harvest data from the charter sector immediately will become vastly more precise and more reliable than at any previous time. Those improvements will follow naturally from the reporting and monitoring necessary to implement charter IFQs. This removal of substantial uncertainty regarding actual charter harvests will constitute an important gain in the quality of data compared either to past estimates or to information available under a GHL alternative.

Still regarding fishery management issues, a frequently stated position holds that charter clients are the actual harvesters of halibut, charter vessels only platforms that perform little more than transport functions and thus not appropriate to incorporate into an IFQ system. Obviously this view is just another facet of the recreational priority issue referenced above in 2. However, it does raise a point about fishery management considerations that, although seemingly apparent, should be stated for clarity. The charter operator, not the client, presents the only meaningful unit for assessing impact of the fishery on the halibut resource. Operators provide access for clients but that service

involves the necessary equipment, expertise, and accumulated knowledge of the area and the halibut resource in addition to transport. Charter operators are the constant element in the fishery both within a season and from year to year. Reliable accounting of the annual catch, of catch-per-unit-effort, or of other measures relevant to monitoring the fishery are available only through evaluation of the charter operators' season-long performance. From a resource management perspective, they alone are responsible for the annual catch of halibut in the guided recreational fishery.

In conclusion, the move to rescind April's approval of the charter IFQ program should be rejected for two compelling reasons. The public needs assurance that this Council will remain consistent with its record of acting on the basis of well-informed assessment of the issues before it, not in response to raw, personal political pressure. Simply bringing the IFQ issue to the point of potential reversal, without pretense of additional substantive input, discredits the Council. To proceed to carry out that rescission will significantly damage the credibility of this body and its recommendations into the future. Every bit as important, revoking approval of charter IFQs theoretically involves falling back to a simplistic GHL approach but realistically will reopen the entire issue. What the Council passed in its IFQ program entailed an undeniably superior method for finally resolving a major allocation conflict and for substantially rationalizing scientific fishery management of halibut off Alaska. Support for implementing that IFQ program is widespread throughout the various segments of the affected public. That public, and likely this Council, cannot afford to lose the advances that its IFQ action entails. The IFQ program unequivocally should not be rescinded. I urge you most strongly to act accordingly.

I thank you for the opportunity to offer my comments into the record.

Cordova District Fishermen United

**Celebrating 65 Years of Service to Commercial Fishermen in Cordova, Alaska
P.O. Box 939 Cordova, Alaska 99574 / Telephone (907) 424-3447 / Fax (907) 424-3430**

September 21, 2001

**Mr. David Benton, Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99501-2252**

SENT VIA FACSIMILE TO 907.271.2817

Dear Chairman Benton,

Cordova District Fishermen United is writing to express strong support for the halibut charter boat IFQ program approved in April of this year, and to ask Council members to vote against rescinding the program.

The Council's approval of a charter IFQ program is the culmination of many years of thorough development and analysis of a long-term solution to bitter allocation disputes, overcapitalization of industry sectors, and inefficient use of fisheries management resources. These are some of the most crippling problems facing our nation's fisheries and the people and communities who depend on them, and the Council's action on this issue is highly commendable.

Council Staff and the Scientific and Statistical Committee developed the charter IFQ program with significant guidance from the charter sector, substantive agreement and compromise between the charter and commercial sectors, and very detailed analysis and review. Over 8,000 written comments or petition signatures, and countless hours of public testimony support the charter IFQ program.

The CDFU Groundfish Division membership, made up of both charter and commercial fishermen, has been unanimous in its support of the halibut charter IFQ program.

The State of Alaska's position against the charter IFQ program and in favor of a charter license moratorium and a GHL is not supportable or credible historically as a long-term solution to allocation disputes and overcapitalization. In light of all of the Council's recent efforts to rationalize other fisheries, and in light of the State of Alaska's experience with

latent effort in limited entry fisheries, the State's position is a step backwards in fisheries policy.

Voting to rescind the charter IFQ program would be a purely political action riding roughshod over the traditional Council process of thorough and open review and analysis of fisheries resource management issues.

With declines in prices and abundance of salmon and herring in Prince William Sound, many of our fishermen have invested in, and come to depend considerably on the halibut and blackcod IFQ fisheries for the economic stability that they provide. The community of Cordova benefits substantially from this economic stability as well. Rescinding the charter IFQ program would be economically harmful to fisheries dependent communities such as Cordova, and it would destabilize both the charter and commercial halibut sectors through continued allocation disputes. This would be a fisheries policy step in the wrong direction, and we ask for your continued support for the halibut charter IFQ program.

Sincerely,

Sue Aspelund

Sue Aspelund
Executive Director

Dan Hull

Dan Hull
Groundfish Division Co-Chair

CC: Gov Knowles

9/30/01

Mr. Benton, Chair:
JPMC:
SIV:

In 1995 I was awarded quota shares equal to 65% of my average 2C halibut catch, over the qualifying period. A full 35% of my S.E. pounds were allocated as compensation to westward longline fishing vessel owners, for their losses to "community development quotas". So, I'm a little weary of all these concessions to charter boat operators.

As egregious as I find these concessions, I recognize them ~~and~~ ^{as} the ~~same~~ ^{same} level of stability in the halibut fishery. I urge the council to pay little heed to Mr. Penny, and his governor. Tony Knowles has waffled on the IFQ debate from the beginning to end. Depending on seems, on whos got the campaign financing. We need a stable halibut fishery. Nearly all of our state managed fisheries are in a deplorable state. Over capitalizing and over geared. The guided sport sector is no exception. Please finish "rationalizing" the management of the halibut resource. But, back off on these "enticements" to the guides. ~~When available, all ready.~~

Signature of D. Ryter
D. Ryter
Box 8124
Port Alexander AK
ph. 907-568-2282

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4 Th. Ave. Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 200 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

I'm not going to waste any more time discussing the vulnerability of my livelihood and financial status on this issue. I have discussed that in quite a few previous testimonies. At this point I consider it intuitively obvious. What is now at stake as far as I am concerned is the integrity of NPFMC to operate with public input. There has been support for this from members of the charter boat fleet as well as the commercial fishing fleet; a vote has been taken. If you rescind this action it will set bad precedent.

I hope that you decide to abide by your currently standing decision. Thank you for your consideration.

Sincerely,


James C. Hughes

P.O. Box 22, Pelican, AK 99832

Date: 9/24/01

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name:

David Boray

Address:

2729 Tongass Ave # 30 KT KTN, AK. 99901

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Date:

9/21/01

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: CHRISTOPHER P. FRANKLIN

Address: 3401 W. LAWTON ST, SEA WA

98199

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

I DONOT BELIEVE A CHARTER BOAT IFQ
WILL HINDER ~~THE~~ THE CHARTER BUSINESS. IT
WILL MAKE THIS BUSINESS MORE PROFITABLE
OVER THE LONG RUN.

Date:

9/4/01

Mr. David Benton
Chairman

North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name:

John C. Gregory

Address:

Box 342 Corbush, AK 99574

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

9/4/01

Dear Mr. Benton

I fish a small quota in P.W.S. out of Cordova. The present Charter Boat pressure on where I fish my I-FQ's has forced me to sell some quota because I can't always catch it where I used to. The charter boats clean up all the fish quickly and forced me to go back to town without the fish I was used to catching. I ran low on fuel and was forced to return to Cordova $\frac{1}{3}$ Full with the same expenses. I do not favor any one charter boats or more catch. This puts a handle on them! I need equal playing field at least I was there first! This charter boat I.FQ. system is necessary. Let me compete!

Sincerely John C. Gregory
P.V. "Coastal Bronco"

John C. Gregory
9/4/01

20 September 2001

VIA FACSIMILE - 907-271-2817

Mr. David Benton, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Dear Mr. Benton:

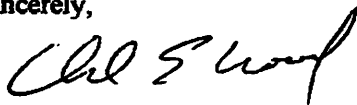
I have fished halibut commercially in Southeast Alaska's Area 2C since 1982. It is almost unbelievable that part of the halibut industry is strictly managed, while another part has virtually no restrictions, and is encouraged to expand at the expense of the other.

At the inception of Alaska's IFQ program, I personally lost 91% of my total production of each of the prior two years. However, I have since recovered most of my halibut poundage through various financial institutions, including a National Marine Fisheries loan.

I am amazed at those who complain at receiving 25% more than what they have ever produced before. Under an IFQ program, they could expand even more if they so chose. I can see no way that clientele of charter operators could suffer under an IFQ program. Charter operators would be able to provide a valuable resource and experience to their clientele, in a responsible way.

Thank you for your consideration of this testimony.

Sincerely,



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

cc: Governor Tony Knowles

I'VE ALREADY FAXED THIS TO NMPF & GOV. OFFICE

Date: 9-21-01

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

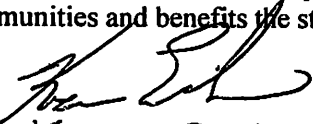
The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,



Name: Ken Eichner

Address: 5166 Shoreline Dr. W Ketchikan AK 99901

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Date: 9-18-01

Mr. David Benton
Chairman
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Benton,

I urge you to continue supporting the 2C/3A IFQ program for charter halibut vessels adopted in April 2001 and recommend you to vote against rescinding the program.

The Council's adoption of a charter IFQ program is the result of much hard work since 1993. The Council decision followed a thorough staff analysis, substantive agreement between commercial/charter operators, many hours of public testimony, and over 8,000 written comments or petition signatures. The state has presented no compelling new information why the program should be rescinded. Voting to rescind the charter IFQ program would be rough politics overriding rational management, and not in keeping with Council tradition.

My family and I depend on the commercial halibut fishery for a significant part of our annual income. The halibut fishery provides sustainable jobs in our community and benefits many businesses such as grocers, trucking firms, repair shops, airlines, and restaurants. Commercial halibut dollars flow through almost every business in town. We have invested heavily in IFQ because of the stability promised by the government. Rescinding the charter IFQ program would result in continued allocation disputes between commercial fishermen and charter operators, resulting in instability in both industries.

Charter IFQs are needed to rationalize the entire industry, setline and charter. Charter IFQs are a long-term market based solution that will allow fisheries management to focus their efforts on improving management of the resource, rather than waste precious funds getting involved in allocation disputes.

Your consideration of this letter is appreciated. Commercial fishing provides many jobs in our local communities and benefits the state in many positive ways.

Sincerely,

Name: Nikita Z Kuzmin

Address: P.O. Box 2272 Homer AK 99603

Copy: Governor Tony Knowles
State of Alaska
PO Box 110001
Juneau, AK 99811-0001
Fax (907) 465-3532

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Sheryl L. Mayo Sheryl L. Mayo	2800 SMC, SITKA AK	10	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Charlie L. Bower III CHARLIE L. BOWER III	2369th 3 H.P.R., SITKA AK 99836	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Don Dix	P.O. 6006 SITKA AK 99835	1	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
MORGAN M. DOUBLEDAY MORGAN M. DOUBLEDAY	Box 6507 SITKA AK 99835	4	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
John Maher John Maher	231 Katikan - M-37 SITKA, AK 99835	8	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
JENNIFER ALLEY Jennifer Alley	PO 8012 PORT ALEXANDER AK 99836	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

FAXED

Page 1

DATE 9/23/01

Page 3

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

Habitat IFQ for Guided Sport Charter Fishery in Area 2C/3A

NAME	ADDRESS	Number in Family	TYPE OF USER	<input type="checkbox"/> Subistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator
Steven T. Moffat	P.O. box 6537 Sika AK 99835			<input checked="" type="checkbox"/> Subistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator
Korina M. Madar	P.O. box 6537 Sika AK 99835			<input checked="" type="checkbox"/> Subistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator
<i>[Faded Name]</i>	<i>[Faded Address]</i>			<input checked="" type="checkbox"/> Subistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator
MICHAEL J. MAYO	28025 SAWMILL Ck RD SIKA AK 99835	7		<input checked="" type="checkbox"/> Subistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator
Jessie Madar	Box 7423 Homer, AK 99603	3		<input checked="" type="checkbox"/> Subistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator
<i>[Faded Name]</i>	Box 4203 Homer AK 99603	3		<input type="checkbox"/> Subistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport	<input type="checkbox"/> Charter Operator

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
KELLY FERGUSON	3880 HPR, SITKA 99835	4	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Bob Potrzuski	2013 KAINULAINEN, SITKA 99835	5	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Pete J. Karas	230 Koguzhiton SITKA AK 99835		<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>[Signature]</i>	104A EBERHARDT DR. SITKA, AK. 99835		<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
<i>[Signature]</i>	104 B EBERHARDT DR SITKA AK	2	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 4

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
John Hedden	1905-B Dodge Cir. Sitka, AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Peg Shea	1309 Edgecumbe Dr Sitka, AK	6	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
CHANCE ALLEN	101 Austin St. Sitka, AK	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Anthony Huskins	1805 Edgecumbe Dr Sitka, AK	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
John Francovich	404 Mills St. Sitka, AK	2	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Spencer Bell	3912 A HOR Sitka AK	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 5

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Noah S. Mayo <i>Noah Mayo</i>	2800 S.M.C. Sitka, AK. 99835	5	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Jim DiGennaro <i>Jim DiGennaro</i>	105 Metlakath St. Sitka, AK 99835	5	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Katu Udelipa	202 Peterson St. Sitka, AK 99835	5	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Justin Carlson	331 Workman Ln. Sitka AK 99835	4	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Ratherine Blush	3201 HPR Sitka, Ak 99835	8	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Adam Hackett	500 Lincoln # M15 Sitka, AK 99835	4	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 6

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Robert L. Chevalier <i>RLC</i>	PO Box 2873 Sitka AK 99835	3	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Michael R. Coleman <i>MLC</i>	2820 S.M.C Sitka AK 99835-	6	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Steve Lawrie & Jamie	PO Box 2976 Sitka AK 99835	6	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Ron Hegge <i>RH</i>	8328 Misty Lake Cir Sarasota Fl. 34241		<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Boyd D. Dickson <i>BD</i>	428 Kogwanan Sitka AK 99835	1	<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23

Page 7

Halibut IFQ for Guided Sport Charter Fishery in Area 2C/3A

We, the undersigned, urge the North Pacific Fishery Management Council to continue supporting the charter IFQ program adopted at the April 2001 Council meeting. We deplore recent efforts to rescind this program at the October 2001 Council meeting. In April 2001 the Council made a good decision based on a thorough analysis and considerable public input. No new information has been presented which justifies the Council rescinding its April 2001 action.

NAME	ADDRESS	Number in Family	TYPE OF HALIBUT USER
Thomas J Corso	P.O. Box 6502 Sitka AK 99835	2	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Jamie Elstad	P.O. Box 1522 Sitka Ak.	2	<input checked="" type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input checked="" type="checkbox"/> Charter Operator
Tamara Brownell	P.O. Box 6547	5	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Mike Dwyer of Westport	30 Baranoff St. Sitka, Alaska 99835	3	<input checked="" type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
Oleher Mayo Oleher Mayo	2800 2000 Saw Mill Creek Rd. Sitka, AK 99833	10	<input type="checkbox"/> Subsistence <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator
			<input type="checkbox"/> Subsistence <input type="checkbox"/> Commercial <input type="checkbox"/> Sport <input type="checkbox"/> Charter Operator

DATE 9/23/01

Page 8