

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director



ESTIMATED TIME
6 HOURS

DATE: April 3, 2000

SUBJECT: Halibut Charter IFQs

ACTION REQUIRED

Review committee recommendations for developing an IFQ program for the halibut charter fishery.

BACKGROUND

In February the Council approved a GHL program for the halibut charter fishery and fast-tracked development of an Individual Fishing Quota program. A committee was named shortly thereafter and met on March 22-23. Its report with recommendations is under item C-1(a). They will meet again April 10 and may have additional comments or revisions.

Our intent is to come back in October with a preliminary analysis of the elements and options approved at this meeting. This issue will not be on the Council agenda in June, though the SSC may be asked to review the analytical approach to ensure we are on the right track.

As you will see in the committee report, there are several issues beyond the IFQ options, on which we could use some guidance. First and foremost is how to proceed with submission of the GHL amendment. The proposed IFQ program potentially could alleviate the need for a GHL. With transferability of IFQ between the charter and commercial fishing sectors, there will no longer be the potential for an open-ended reallocation from the commercial sector, and the charter sector will be able to exceed the GHL with purchase of quota (unless, of course, the Council places a cap on transferability). An IFQ program may also alleviate the need for reductions in charterboat harvest limits in periods of low abundance, and for management measures to constrain harvests within the GHL.

Nevertheless, it's my intention, unless I hear otherwise, to finalize our GHL package and submit it to the Region for review. This is going to create work for NMFS which may prove unnecessary in the long run, but at least we will have restrictions in place if somehow the development of IFQs is delayed or derailed for one reason or another.

COMMITTEE RECOMMENDATIONS ON ELEMENTS AND OPTIONS FOR CHARTER IFQ ANALYSIS

Issue 1. Qualification Criteria

Initial allocations will be based on an individual's participation and not the vessel's activity. Anyone not meeting the qualification criteria would have to purchase QS or transfer (lease) IFQs to participate in the halibut charter fishery.

- Option 1. Halibut charter operators who carried clients in 1998 and 1999 and who submitted ADF&G logbooks (as received by ADF&G by February 12, 2000)
- Option 2. Halibut charter operators who carried clients in 1998 or 1999 and who submitted ADF&G logbooks (as received by ADF&G by February 12, 2000)
- Option 3. Halibut charter operators who carried clients prior to June 24, 1998 and who submitted at least one ADF&G logbook (not specified by committee: in 1998 or 1999) (as received by ADF&G by February 12, 2000)
- Option 4. four out of five years between 1995-1999 as evidenced by IPHC and CFEC licenses for 1995-99 and submitted logbooks for 1998 and 1999
- Option 5. four out of five years between 1995-1999 as evidenced by IPHC and CFEC licenses for 1995-99 and submitted logbooks for either 1998 or 1999

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

- Option 1. Charter vessel owner/operator - individual who owns and operates (captains) 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
- Option 3. owners of charteboats that hired licensed captains/skippers - persons that owned the vessel that they controlled as a charterboat but hired a captain/skipper to operate the vessel
- Option 4. hired skipper - individual without financial interest in the vessel, hired for the labor only of operating a charterboat and paid a wage or commission as compensation

Issue 3. To receive halibut charter IFQ by transfer:

- Option 1. Must be an individual;
3 years apprenticeship as deckhand and reference letters from captains
Must hold USCG license;

- Option 2. Must be an initial charter issuee
- Option 3. Must be a new charter operator (defined by State of Alaska requirements)
- Option 4. Must be eligible commercial operator

Issue 4. Transferability of QS (permanent) and IFQs (on annual basis [leasing])

- Option 1. Within a sector
 - suboption. 3-yr one way transfer from commercial to charter
- Option 2. Within an area
- Option 3. Two-way (between commercial and charter sectors).
- Option 4. Caps
 - suboption 1. no caps - free transferability
 - suboption 2. on percentage of annual IFQ transfers (de facto leasing) between sectors
 - suboption 3. not to exceed 25% of total QS and IFQ and 5% of annual QS and IFQ transfers from charter to commercial; not to exceed the amount needed to meet the area GHIL (1.4 M lb in Area 2C and 3.91 M lb in Area 3A) from commercial to charter
 - suboption 4. eliminate commercial blocks; allow splitting of commercial blocks
 - suboption 5. on percentage of QS transfer between sectors
 - suboption 6. allow splitting of commercial blocks for transfers to charter sector
 - suboption 7. from commercial B, C, and D only vessel category sizes to charter
 - suboption 8. from charter to commercial 1) D category only; 2) B, C, and D category
 - suboption 9. initial transfer from undesignated charter to a particular commercial vessel category locks in at that commercial category
 - suboption 10. one transfer of QS/IFQ each year between a sector
 - suboption 11. minimum size of transfer is range of 20-72 fish

Issue 5. Initial IFQs may be based on:

- Option 1a. 100 percent
- Option 1b. 125 percent
 - suboption. Set aside 5-10% of 125% for appeals
- Option 1c. 200 percent
- of:*
- Option 2a. 1998 logbook harvest
- Option 2b. 1999 logbook harvest
- Option 2c. operator would choose either 1998 or 1999 logbook harvest

Option 2d. average of 1995-99 logbook harvest

Option 3. 70% of 125% of 1998 & 1999 logbook average with an additional 10% (of the 125%) added for each year of operation 1995-97. The balance could then be re-issued to the whole group of participants (some individuals vessel's total could be over 125% of the 1998 and 1999 logbook average, new entrants may receive only 70% of their 1998 and 1999 logbook average), or this balance could be set aside for initial issue hardships (longevity reward)

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Option 5. client days fished

Option 6. Modified Kodiak proposal: 5-30% for A, 33% for B, 37-62% for C (see attachment)

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 average 1995-99 logbook (GHL).

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

Issue 6. 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 7. Reporting:

Option 1. QS holders may be required to report their landings at the conclusion of their trips

Option 2. logbook

Issue 8. Other aspects of charter QS

Option 1. ownership cap of 1/2 or 2% of charter QS units by area, grandfather initial issues

Option 2. maximum line limit of 12 in Area 3A (remains at 6 lines for Area 2C), grandfather initial issues

Option 3. 10% rollover provision

Option 4. appeals process

Option 5. recovery of program costs

Issue 9. Charter IFQ program for Areas 2C and 3A only

Issue 10. Duration of charter IFQ would have no specific ending date (similar to commercial IFQs)

Issue 11. Charter IFQ program replaces the recently approved Guideline Harvest Level (GHL) program



Capt. Jim's

GREAT ALASKA CHARTER COMPANY

March 2 2000



N.P.F. NORTH PACIFIC FISHERY MANAGEMENT
COUNCIL.

Dear Mr. RICHARD LAUBER

On Feb. 16 th I attended the Valdez charterboat association meeting and learned of the new I.F.Q. qualifying years to remain in the Halibut fishery. I was shocked to learn that I had been left completely out of the I.F.Q. despite

a 12 year history in the VALDEZ charterboat fishery. The only two years I did not fish was 1998 and 1999 do to my wives cancer. Here is a brief review of my halibut charter history. I obtained my U.S.C.G. license in 1984 and began running halibut and salmon charters in a 28' sportboat. I called my business Capt. JIM'S CHARTERS. I chartered the 28' footer until fall of 1987. In March 1988 I purchased a 40' crewboat (inspected vessel) in Louisiana and brought it to Valdez. The boat was the first halibut party boat in Valdez. I named her the SEA RUBY. I fished the SEA RUBY until it's sale in the fall of 1994. In March of 1995 I purchased a 65' crewboat in San Francisco and sailed her to Valdez. I named her the ORCA PRINCESS. The ORCA PRINCESS was one of the largest halibut charter boats in Alaska and the largest on Prince William Sound. I ran halibut charters aboard the ORCA PRINCESS until fall of the 1997 season.

My wife Ruby had developed breast cancer and eye disease. It was at first believed that the cancer had metastasized in her left eye. Surgery would later prove this to be false although she lost 50% eyesight in her left eye. As a result of her medical condition we felt it was necessary to take two seasons off. We sold the ORCA PRINCESS back to it's former owner and placed the money into the Capital Construction Fund (CCF) for our next charter boat. We paid our boat slip (wait list) fee's to the Valdez Harbor master the same day we sold the ORCA PRINCESS. We felt that we would later buy a smaller and faster party boat.

P.O. Box 1369 • Valdez, Alaska 99686
1-800-997-6722
907-835-2282
FAX: 907-835-3656

**Sea-Scape Adventures
502 Charteris Street
Sitka, Alaska, 99835
(907) 747-7680
e-mail seascape@ptialaska.net**

RECEIVED
MAR 22 2000
N.P.F.M.C.

March 17, 2000

North Pacific Fisheries Council
605 West 4th Street
Suite 306
Anchorage, Alaska 99501

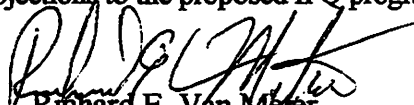
SUBJECT: Guided Sport Fishery Halibut IFQ

As an independent charter boat operator I would like to state my opposition to the proposed IFQ program. I believe to rush this proposal through without taking into consideration the special circumstances that apply to the charter operators of Sitka, would result in many appeals.

Sitka charter operators worked with the NPFC and the International Halibut Commission to develop a plan to stabilize the Halibut population in Sitka Sound. An agreement between all interested parties was reached in 1997, the charter operators were then asked to refrain from fishing in the effected area on an "honor system" until the closure went into effect. At about the same time that we were working to reach an agreement with the other interested parties, we were informed by the ADF&G that we would be required to maintain a Log Book and record all fish caught. At a meeting of the Sitka Charter Boat Owners Assoc. the ADF&G representative was asked if these logs were for the purpose of fish management or would they be used to penalize the charter operators? We were assured that the logs would only be used for the management of the fish stocks. With this assurance, the operators completed the log books accurately while observing the request not to fish in Sitka Sound. A large majority of the independent charter operators—not to be confused with lodge-style charter operators—in Sitka depend on the cruise ships for a big part of their income and because the area that remains open to Halibut fishing is beyond the reach of an average cruise ship trip, these operators have logged few, if any, halibut in the years proposed for qualification quota shares.

I object to the use of the log books and the fish count thereon to establish qualification for Quota Share until it is verified that the fish recorded were caught in an area where operators were qualified by license issued by the U.S. Coast Guard to take a charter fisherman. Any fish determined to have been caught in an area where the operator was not qualified should not be considered in the IFQ quota shares.

Thank you for hearing and considering my objections to the proposed IFQ program.


Richard E. Van Meter

North Pacific Fisheries Council
605 West 4th St.
Suite 306
Anchorage, AK 99501

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MAR 27 2000

N.P.F.M.C

Dear Council Members,

1. The charter operators in Sitka, who have signed this letter, would like Council members to consider the following as you discuss the proposed IFQ halibut charter program and the forthcoming recommendations for IFQ guidelines.
2. Using the 1998 or 1999 log books would penalize charter operators from Sitka who voluntarily supported the closure of Sitka Sound to the taking of halibut by guided operators. Many of the charter operators who normally rely on the cruise ships for a large percentage of their income observed the honor system, therefore logging few, if any halibut. The same charter operators who provided input to the Halibut Task Force and honored the process by not fishing Sitka Sound in the hopes of settling the ongoing problem between guided, unguided, and subsistence fishers are now in the position of being penalized.
3. To reward the charter operator who chooses to show little or no regard for the fisheries by logging all halibut hooked whether released or not is irresponsible and offensive to the charter operator who encourages his clients to release both juvenile and large spawning fish.
4. Please consider the following ideas:
 - a. IFQ's would be issued to the owner of the charter vessel, thus stabilizing the number of charter boats fishing for halibut.
 - b. The owner of the IFQ's would be required to be on board the vessel fishing the permit. Exceptions would be for certified medical reasons or as currently outlined in the Commercial program.
 - c. Any paid Captain who has worked for the same operator for three (3) years would receive a percentage of the IFQ's. The remaining percentage would go to the owner of the vessel. The percentage acquired by the paid Captain would be non-transferable; whereas the percentage given to the boat owner would be transferable.
 - d. Distribution of the IFQ's would be equally distributed between those charter operators who were working full time and had a Halibut Permit issued by the International Pacific Halibut Commission.

e. The cutoff date to qualify for the proposed IFQ Program would be based on the same year as the originally proposed GHL.

f. Any fish caught in an area where the operator or his paid Captain were not qualified or did not have proper endorsements issued by the USCG would be disqualified from consideration.

g. The vessel owner/operator would have to have been in compliance with all city, state, and federal regulations to including a random drug testing program for the established year(s) per Coast Guard Regulations (CFR 46, Part 16).

h. The owner receiving the IFQ'S would have to have had a State of Alaska Business license and or city licenses and show proof of payment for all required city taxes for the year(s) established.

i. Some formula should be developed to give consideration to the charter operator who has invested both time and money in his business and community.

j. The qualifying year or years should be one of the options as outlined in NPFC notices mailed over the past two years with the exception of the use of log books for any year. Those operators with a vested interest in using 1998 or 1999 as the proposed year might have been able to prepare themselves for the maximum benefit or at least give the appearance of such.

5. Also, there are a number of questions that come to mind regarding potential issues if IFQ's are granted.

a. Who would own the fish, sport fisherman or permit holder?

b. Would captain and crew be required to have a Crew License?

c. Would there be a daily catch limit and/or annual limit for non-residents or would the permit holder have the option of controlling his IFQ's as he/she saw fit?

d. Could the permit be leased to or shared with another permit holder for an unused portion?

e. How would the catch be verified, either weight or number?

f. Would all catches be required to report to a certified fish station? Very difficult in Southeast Alaska.

g. Would crossover between sports IFQ's and commercial IFQ's be allowed?

h. Could any portion unfilled by guided sport fishermen be caught and sold by permit holder?

i. Would NMFC make loans available to those operators wishing to expand their quota or to enter the program?

We thank you for considering the above. We understand that this is a most difficult process and that many considerations will come into play as you make your final recommendations. We appreciate being 'heard'.

Signed:

Operator	Business Name	
<i>R. Van Meter</i> (VAN METER)	SEA-SCAPE ADVENTURES	AD746 H 65289
<i>Robert Purvis</i> (PURVIS)	Alaska Fantasy	66541
<i>Jeffrey</i> (HUNTINGTON)	SEA QUEST CHARTERS	66056
<i>John Brooks</i> (BROOKS)	Raindancer Sportfishing Charters	66612

This letter reflects my opinion.
Let the commercial fisheries clean
up it's own act first, Trawlers &
other longline fisheries that waste
habibut,

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MAR 13 2000

N.P.F.M.C

Thank
you

Bob Muller
A-1 Fishing Charter
P.O. Box 3201
Valdez, AK

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EVERS
GORDHAND
Fields etc

Supplemental Recommendation on Elements and Options for Analysis Regarding Charter IFQ's April 13, 2000

Apprenticeship or Qualifying Criteria:

In late discussion during the committee meeting some sort of apprenticeship or qualifying criteria was dropped from Issue 3. The early language was "3 years apprenticeship as a deckhand and reference letters from captains." It was thought that something parallel to the 180 days (or approximately one season) of sea time on the commercial side would be appropriate and create a standard for professionalism and experience. Although this was a strong minority view, several charter operators didn't want restrictions. The council may want to revisit this issue and include some sort of apprenticeship criteria for analysis.

One approach might be to look at apprenticeship in terms of "angler days". Angler days are any portion of a day that an individual is fishing. Thus, if a charter operator takes two groups of 6 clients out ½ days or for any time at all, he or she has guided for 12 angler days. If a charter season is 90 days and the charter operator averages 6 angler days for each charter day he would have guided for 540 angler days during one season. Perhaps a range of 300, 500 & 750 angler days would be appropriate.

The language for a new option under Issue 3 could read:
Issue 3. To receive halibut IFQ by transfer:

- Option 4: New issues must have worked on a halibut charter vessel for no less than
- a. 300 angler days
 - b. 500 angler days or
 - b. 750 angler days

**Supplemental Recommendations on
Elements and Options for Analysis
Regarding Charter IFQ's
April 13, 2000**

Over the past two days, during discussions before the AP and with NMFS staff as well as council members, several concerns have been raised regarding the consolidation of charter IFQs by larger economic entities. The current options for analysis, whether the AP version or the Charter IFQ committee recommendations, may not adequately address these concerns. Consequently, the Council may want to consider inclusion of the following options.

Insert new issue 12:

Issue 12. Owner on Board Provisions

Option 1a. The owner of charter quota share (QS) must be present on board the vessel when 25% of his QS is landed and retained by clients.

Option 1b. The owner of charter quota share (QS) must be present on board the vessel when 30% of his QS is landed and retained by clients.

Option 1c. The owner of charter quota share (QS) must be present on board the vessel when 35% of his QS is landed and retained by clients.

Revise Issue 8, Option 1:

Issue 8. Other Aspects of Charter QS

Option 1. Ownership cap of 1/4, 1/2 and 3/4% of combined QS units in Area 2C and 1/8, 1/4, and 1/2% of combined QS in Area 3A and grandfather initial issues at their initial allocation.

Comment: The possible quota share obtained by a cap of 1% (approximately 223,000# or 10,670 fish in Area 3A and 95,000# or 4,545 fish in area 2C) in either Areas 3A or 2C would exceed the harvest needs of the most productive current vessels or current combination of vessels and would lead to increased capitalization in markets already overdeveloped. It was suggested that a highline charter boat obtains approximately 750 - 900 fish annually. Using 2000 QS numbers, 1/8% of the combined 3A quota would provide the charter vessel with approximately 1,136 fish and, in 2C, 1/4 of the combined quota would provide a vessel with approximately 1,136 fish.. The higher caps would provide for operations with multiple vessels.

Illustrative Tables

Area 3A —

2000 combined quota of approximately 22.3 million pounds of Halibut
(totals are approximate)

% of Total Combined QS	% expressed in pounds	% expressed in fish
1%	223,000 pounds	10,670 fish
3/8%	83,626 pounds	4,001 fish
1/4%	55,750 pounds	2,667 fish
1/8%	27,875 pounds	1,334 fish

Area 2C —

2000 combined quota of approximately 9.5 million pounds of Halibut
(totals are approximate)

% of Total Combined QS	% expressed in pounds	% expressed in fish
1%	95,000 pounds	4,545 fish
3/4%	71,250 pounds	3,408 fish
1/2%	47,500 pounds	2,272 fish
1/4%	23,750 pounds	3,408 fish

Note: If there was a desire to standardize the cap (in either number of pounds or fish) in areas 3A and 2C uneven fractions of QS could be used.

Charter IFQ Analysis
NPFMC Testimony of Duncan Fields
Gulf of Alaska Coastal Communities Coalition
April 12, 2000

Mr. Chairman, members of the council, I served as a technical advisor on the Halibut Charter IFQ Committee. My experience, while serving on that committee, was that the recommended charter analysis grew from a consensus of the charter industry and, with a few exceptions, represents the issues that need to go forward for analysis. The AP addressed a small number of issues and made some necessary corrections to the Charter Committee's draft document. I recommend that the Council send the revised AP document forward for analysis.

As we all know IFQ type fishery management has only been implemented in four fisheries. From the outset, the gifting of IFQs was very controversial. In 1996, Congress imposed a moratorium on new IFQ programs and directed the National Academy of Sciences to study a wide range of questions concerning the social, economic, and biologic effects of IFQ's and to make recommendations about existing and future IFQ programs. The Ocean Studies Board of the Academy conducted 5 hearings and heard testimony from a host of witnesses. Their report, entitled "Sharing the Fish: Toward a National Policy on IFQs" was published in December 1988 and sets forth a number of public policy concerns about the use of Individual Fishing Quotas.

In the section of Sharing the Fish entitled "What Should Regional Fishery Management Councils Do?" the NRC reports recommends under three of 14 bullet points that coastal communities should be considered in the allocation of quota share. The report states: "... Councils could avoid some of the allocation controversies encountered in the past by giving more consideration to (1) who should receive initial allocation, including crew members, skippers, communities, and other stake holders;" The report further advises that "When designing IFQ programs, councils should be allowed to allocate quota shares to communities or other groups, as distinct from vessel owners or fishermen...." And finally, the report recommends "If important

Duncan Fields' Testimony
Charter IFQ Analysis
April 12, 2000

objectives include maintaining owner-operated fisheries and fishery-dependant coastal communities, greater attention may have to be given to equity considerations in setting the upper limits on ownership, limiting transfer of quota shares outside communities, and similar measures.”

A strong minority view on the Charter IFQ committee sought to include communities for analysis as possible recipients of halibut charter IFQs. Although this was not included in the charter committee document, “coastal communities of less than 2,500 people not connected to the road system” were added in the AP recommendation and approved by a vote of 18-0. The AP recommendation tracks the directives of the National Academy of Science. I trust you will include the AP’s recommendations for analysis of community IFQ ownership in your final Elements and Options for Analysis document.

Thank You

Draft List of Communities Qualifying for Analysis Under AP Recommendations for Halibut Charter IFQs.

Qualifying Criteria: Area 2C and 3A fishery dependant coastal communities with populations of less than 2,500 people and not connected to the road system.

Area 2C		Area 3A	
Community	Population ¹	Community:	Population
Angoon	601	Akhiok	80
Cuffman Cove	254	Chenega Bay	96
Craig	1,946	Karluk	58
Edna Bay	79	Larsen Bay	130
Elfin Cove	48	Nanwalek	162
Gustavus	328	Old Harbor	310
Hollis	106	Ouzinkie	259
Hoonah	903	Port Graham	170
Hydaburg	406	Port Lions	233
Hyder	138	Seldovia	289
Kake	696	Tatitlek	124
Kassan	41	Yakatat	801
Klawock	759		
Metlakatla	1,540	12 communities	2712
Meyers Chuck	35		
Pelican	209		
Point Baker	62		
Port Alexander	98		
Port Protection	64		
Saxman	394		
Tenakee Springs	107		
Thorne Bay	650		
Whale Pass	92		
23 Communities	9556		

¹1995 data — Alaska Dept. Of Labor

**Draft Conceptual Outline for
Charter IFQ or Quota Share (QS) Set aside
for Development of Halibut Charter Businesses in
Fisheries Dependant Coastal Communities
April 13, 2000**

- I. The IFQ Fisheries Management Plan would authorize NMFS to set aside of a specific percentage of QS from areas 2C and 3A to be reserved for use in the halibut charter fishery in fishery dependant coastal communities.
- II. Individuals within communities desiring to fish a portion of the Community Charter QS must qualify as a quota share holder and receive a transfer eligibility certificate.
- III. Qualified individuals wishing to fish a portion of the Community Charter QS must notify their recognized community fisheries entity --- perhaps a non-profit community fisheries development corp.--- of their desire to fish charter QS.
- IV. The recognized community fisheries entity would, after varying qualifications and prior to January 30 of each year, notify NMFS - RAM division regarding those individuals wishing to fish community halibut charter QS. QS not spoken for by January 30th of each year would be returned to the general pool. An administrative fee would be charged by the recognized community fisheries entity.
- V. Individuals within the communities wishing to fish community halibut charter QS would be limited to 5,000# (239 fish), 7,500# (359 fish) or 10,000# (478 fish) of community QS. Any individually owned QS would be offset against this amount.
- VI. No more than 15, 20 or 25 individuals within a qualifying community shall be issued community halibut charter QS.
- VII. If the requests for use of the set aside community halibut quota share exceeds the shares available, individuals will share proportionally.

April 5, 2000
North Pacific Fishery Management Council
Chairman, Richard Lauber
605 W. 4th Avenue Suite 306
Anchorage, AK. 99501-2252

Dear Council,

I wish to apologize for my absence today, I did not wish to miss this opportunity to address the Charterboat IFQ proposal. I needed to have my opinion in front of you while you decide the make-up of the analysis and hope you will entertain my requests.

The GHL as decided in February is not acceptable to my industry for two reasons, first is the GHL cannot be changed by either competing user group without more controversial and lengthy council process. The most beneficial use of the resource is restricted by this decision and so my industry offered the charterboat IFQ proposal to correct this oversight. The second problem with the GHL and therefore the IFQ proposal is the insufficient amount of initial issue quota if based on the GHL amount, especially in light of the declining abundance and the timing of our inclusion in the IFQ program.

The recreational fishery was mandated a two fish bag limit in 1973 and even though we have requested additional fish to our bag limit this council has refused to act on our request. When our request came to the council the IPHC had just reported a larger biomass available than had been thought before and even with this greater opportunity to harvest more we were denied equal consideration. The commercial harvesters gained all the increases from 1973 to the present time while the recreational fishery grew only by greater participation by those resource

owners with fishing rights guaranteed equal to the commercial harvesters by law.

Under the charterboat IFQ program the charterboat industry would have to replace lost opportunity as the biomass goes into a natural decline without ever being offered the opportunity to gain in harvests when the biomass was at an all time high. We are facing perhaps a 65% decrease in abundance before the halibut stocks could reverse the current trend and begin increasing again. My industry will not accept this because we do not sell the fish we catch so there is no way to recoup these additional expenses of obtaining more quota while trying to service the same number of recreational anglers.

If the council cannot see a greater initial issue to the charterboats as warranted in face of this declining biomass or making the initial issue a fixed amount for charter use only with the option to buy more floating quota, then the charter industry cannot support the charterboat IFQ proposal and I will respectfully withdraw it from consideration. Without this consideration there is no need to further proceed in this direction.
Most Respectfully,

Robert Ward