

Public Testimony Sign-Up Sheet

Agenda Item Halibut C-1a+b Catch Shaving Plan

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	NAME (PLEASE PRINT)	AFFILIATION
* 1	Bill Thomas	Self + as State Representative
* 2	Patty Phillips	City of Pelican
* 3	James Phillips	Self
4	Marcy Raymond	Self
5	Curtis Hughes	Alaska Troller Association
6	TRIN DAVY	HAINES PHARMACEUTICALS OF COMMERCE
7	Dan Hull	Cordova DISTRICT Fishermen Union
8	John Raker	Self
9	Bob Sturloff	Self
10	Paul Olson	Sitka Conservation Society
11	Chuck Clement	Self
12	LORRAINE DAVY	Self
13	Todd Hooker	Self
14	Steve Mc Dowell Thursday	Juneau Self
15	Dennis Gudmundson	Haines Self
16	Dina Gregg	Thursday Juneau Self
17	Randy Gregg	Thursday Juneau Self
18	Jeffrey Thomas	SPE, STAFF, Self
19	Liam Radtke	Economist
20	Euel Comstock	CHTF - Chukchee Halibut Task Force
21	Rex Murphy	
22	Theresa Weiser	Sitka Charter Boat Assoc.
23	Holly VAN Pelt	Self
24	Donna Bondioli	
25	Stan Malcolm	

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

Public Testimony Sign-Up Sheet

Agenda Item Halibut C-1 a+b Catch Sharing PLAN

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	NAME (PLEASE PRINT)	AFFILIATION
1	Larry MacQuarrie	
2	Rick Bierman	Juneau Charter Boat Assoc
3	Jeff Wedekind	Juneau Charter Boat Assoc
4	Nick Ranta	Seeward Charter Assoc
5	Steve Zernia	
6	Andy Mezirow	
7	Tim Evers	
8	Dave Wornell or Ron Peck	Alaska Travel Industry Assn
9	JEFF MOORE	INTERNATIONAL PACIFIC SEAFARERS
10	Tom McLaughlin	SEAFARERS PRODUCTS CENTER
11	Chris McDowell	self
12	Royal Hill	self
13	Rhonda Hubbard	self - 7 FGLLer
14	RON BEISCHMANN	self * we are departing
* 15	KURT WOHILHUETER	SELF 1/2 Thursday 9am for airport
* 16	SHERI WOHILHUETER	SELF
17	Russell Swell	self
18	MATT KOPEC	SELF
19	DAVE GOLDSTEIN	SELF
20	JOHN NORRIS	SELF
21	JAY JENKINS	SELF
22	Don Camos	PWS CBA
23	Jan Hickman	North Pacific Seafarers
24	Joe Short	Self
25	Ron BARNES	" "

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Public Testimony Sign-Up Sheet

Agenda Item HALIBUT Club CATCH SHARING PLAN

	NAME (PLEASE PRINT)	AFFILIATION
1	Ken Dole	
2	Richard Yamada	
3	Bryce Brucker	
4	Greg Sutter	
5	Chuck Collins	self
6	Joanne Collins	Self
7	Sherry Kalander	
8	Clay Slavaker	Ktu Guided Sport Fish Assn.
9	TINA McNamee	
10	Seth Bone	
11	Graig Evans	Self
12	JEFF FARVOUR	SELF
13	MIKE DALY	SELF
14	Ryan Kaufman	SELF
15	Chris Bryner	SELF
16	Paul Colow	Self
17	Don Lane	NPEA
18	Bryon Pfundt	
19	Peg Parker	HANA
20	Brent Western	SELF
21	Charles Winter	SELF
22	Steve Fish	SELF Kariel Inc.
23	Bill Lindow	self
24	John Skeele	Self
25	Watt Pasternak	Self

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Public Testimony Sign-Up Sheet

Agenda Item C1a/b Halibut Catch Sharing Plan

	NAME (PLEASE PRINT)	AFFILIATION
1	CHRIS HASTMAKIN	SELF
2	CAROLYN NICHOLS	SELF
3	FREG INDO-OLAND	SELF
4	HENRY MITCHELL	South East Alaska Guides Org
5	Poland man	Self
6	DON WEST LUND	SELF
7	Charles Peerman	self
8	Rod Arno	Alaska Outdoor Council
9	Kimberly Terbrugge	self
10	Brian Bondioli	Alaska Charter Assoc
11	██████ Gale Vick	GOAC 3
12	Conrad Peterson	Old Harbor Native Corp
13	Floddie Christiansen	SELF
14	Taft Perry	self
15	Frank White Wright	SELF / HIA (Hoonah Indian Assoc)
16	Bonnie Mallarda	SELF
17	Bob Alvarson	FVDA - Seattle + Seal Kits
18	John Crowley	SELF
19	KELSEY SKORDAHL	none
20	Lucas Skordahl	Comm. Longline
21	Wendy Alderson	SELF
22	Josh Moore	self
23	Jerod Galamin	SELF
24	DUSTIN CONNOR	SELF
25	Tori Connor	self

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Public Testimony Sign-Up Sheet

Agenda Item 01a/b Halibut Catch Strategy Plan

	NAME (PLEASE PRINT)	AFFILIATION
1	TAMARA CONATSER	Self
2	AUGORA SKORDAHL	SELF
3	KANDY KRAXBERGEN	UFA Halibut Co
4	Chris Buschmann	Commercial Fisherman
5	JULIANNE CUNRY	PVOA
6	JIM MACKOVJAK	GUSTAVS (COLLEAGUE & CITIZEN)
7	CHRIS KNIGHT	EIF
8	Paul Olsen	Sitka Conservation Society
9	Tim Henkel	Deep Sea Fishermen's Union
10	Todd Hopkins	self
11	Jeff Srephoy	UFMA
12	Ryan Hinkel	SELF
13	Kathy Hansen	SEAFSA
14	Steve Hansen	SEAFSA
15	CHAC PEARMAN	KACO
16	Tony O'Connell	
17	Elizabeth Babich	
18	Dave Gibson	
19	Kimberly Behnken	Halibut Coalition
20	Dan Feltz	AZFA
21	Mike Inett	Fisherman
22	Mike Bowen	Fisherman
23	Frank Babich	SELF
24	Colt Luduke	SELF
25	Butch Sims	Self

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Public Testimony Sign-Up Sheet

Agenda Item Club Halibut Catch Sharing Pla

	NAME (PLEASE PRINT)	AFFILIATION
1	KEITH KALKE	SOFT
2	Kenneth Simpson	fisher man
3	JANE GILSON	FISHMAN
4	NEV. SHELTON	UNITED STATES ASIAN FISHERIES
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MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver *Chris*
Executive Director

DATE: September 19, 2008

SUBJECT: Charter Halibut

ESTIMATED TIME 14 HOURS All C-1 items

ACTION REQUIRED

- (a) Receive ADF&G report on 2007 charter halibut harvests.
- (b) Final Action on Areas 2C/3A Halibut Catch Sharing Plan.

BACKGROUND

2007 Charter Halibut Harvests

ADF&G staff released final estimates of 2007 charter halibut harvests on September 10, 2008 (Item C-1(a)); they were posted on the Council website. The 2007 Area 2C charter harvest was 1.918 M lb, which is 33.9 percent over the 2007 Area 2C guideline harvest level (GHL) of 1.432 M lb; the GHL was reduced to 931,000 lb in 2008 due to a reduction in halibut biomass. The 2007 Area 3A charter harvest was 4.002 M lb, which is 9.6 percent over the 2007 Area 3A GHL of 3.650 M lb; the Area 3A GHL has not been adjusted for 2008. ADF&G staff will present the 2007 report.

Catch Sharing Plan

The Council is scheduled to take final action on a proposed halibut catch sharing plan (CSP) for Area 2C and Area 3A. The No Action Alternative would maintain the current GHL program for the charter halibut fisheries in these areas. In April 2008, the Council revised some of the options under Alternative 2. Alternative 2 would implement a CSP for the two areas that would set an initial allocation to the commercial IFQ sector and the charter halibut sector (25 options under Element 1) and allow for seasonal increases in allocation by allowing charter halibut limited entry permit holders to lease commercial individual fishing quotas (IFQs) for use by anglers in the charter sector (11 features under Element 5). Three features of a catch accounting system for monitoring IFQ leases for use in the charter sector are identified under Element 6. Additional policy decisions on the regulatory cycle for implementing separate rulemaking for revising management measures to restrict the charter sectors to their allocations (Element 2), potential management measures in future rulemakings (Element 3), and potential timelines for shortening the delay in implementing future rulemakings (Element 4) would not be implemented in regulation, but would be included in the Council's CSP for Area 2C and Area 3A as guidelines for future rulemakings.

The analysis was mailed on August 29, 2008. The executive summary is under Item C-1(b)(1). A supplement that addresses the NMFS recommendation for Element 6 will be handed out at the meeting as Item C-1(b)(2). Public comments on all charter halibut agenda items are bound separately for Council review.

If approved by the Secretary of Commerce, the 2010 charter halibut season is the earliest that implementation of the CSP could occur given numerous other halibut rulemakings currently being prepared by NMFS (Item C-1(b)(3)).

Area 2C Harvest 2007

User	Port	MeanWt	No. Fish	Yield (lb)
CHARTER	Ketchikan	15.5	11,600	179,296
	POW Island	9.9	30,814	306,567
	PBGAWRG	21.9	8,882	194,691
	Sitka	18.5	35,431	654,409
	Juneau	12.0	7,424	89,433
	Haines/SKG	12.0	0	0
	Glacier Bay	31.5	15,684	493,413
Area 2C		17.5	109,835	1,917,808
PRIVATE	Ketchikan	15.7	9,320	146,339
	POW Island	10.6	12,816	135,866
	PBGAWRG	17.0	8,041	136,570
	Sitka	15.1	5,409	81,927
	Juneau	12.4	14,905	185,130
	Haines/SKG	12.4	986	12,247
	Glacier Bay	25.4	17,021	432,830
Area 2C		16.5	68,498	1,130,909
OVERALL	Area 2C	17.1	178,333	3,048,717

Approximate 95% Confidence Intervals for Harvest Estimates (M lb):

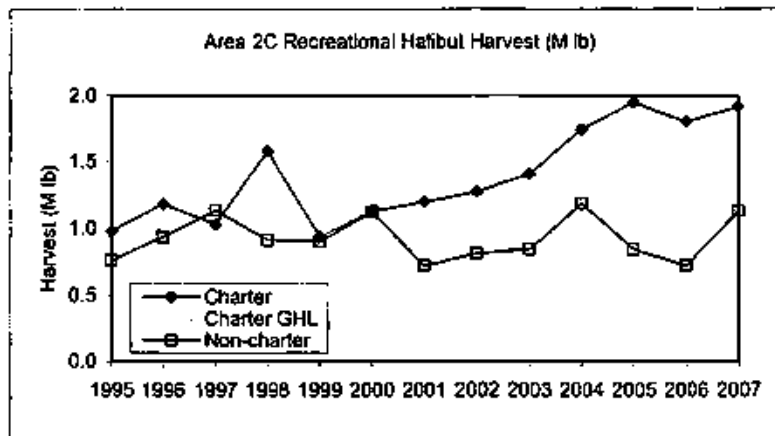
User	PointEst	StdErr	Lower	Upper
Charter	1.918	0.085	1.750	2.085
Private	1.131	0.073	0.967	1.274
Overall	3.049	0.110	2.834	3.264

Comparison of final estimates to last year's projections (M lb):

User	Projected	Final	Proj Error(%)
Charter	1.701	1.918	-11.3%
Private	0.844	1.131	-25.4%
Overall	2.545	3.049	-18.5%

Area 2C Harvest 1995-2007

Year	Charter			Non-charter			Total Sport Harvest		
	No. Fish	Avg. Wt	Yield (M lb)	No. Fish	Avg. Wt	Yield (M lb)	No. Fish	Avg. Wt	Yield (M lb)
1995	49,615	19.9	0.986	38,707	19.3	0.765	88,322	19.6	1.751
1996	53,590	22.1	1.187	41,307	22.8	0.943	94,897	22.4	2.129
1997	51,181	20.2	1.034	33,205	21.4	1.139	104,386	20.8	2.172
1998	54,364	29.1	1.584	42,580	21.5	0.917	86,944	25.6	2.501
1999	52,735	17.8	0.939	44,301	20.4	0.904	97,036	19.0	1.843
2000	57,208	19.8	1.132	54,432	20.7	1.126	111,640	20.2	2.258
2001	66,435	18.1	1.202	43,919	16.6	0.723	109,954	17.5	1.925
2002	64,614	19.7	1.275	40,199	20.3	0.814	104,813	19.9	2.060
2003	73,784	19.1	1.412	45,697	18.5	0.846	119,481	18.9	2.258
2004	84,327	20.7	1.750	62,969	18.8	1.197	147,316	19.9	2.937
2005	102,208	19.1	1.952	60,364	14.0	0.845	162,570	17.2	2.788
2006	90,471	19.9	1.804	50,520	14.3	0.723	140,991	17.9	2.526
2007	109,835	17.5	1.918	68,498	16.5	1.131	178,333	17.1	3.049



Recent regulatory regimes:

Year	Regulations in Place
1995-2005	Two-fish bag limit (no size restrictions), no limit on crew retention
2006	Two-fish bag limit (no size limit), state EO prohibiting crew harvest 5/26-12/31
2007	Two-fish bag limit (1 under 32" elf. 6/1), no crew retention 5/1-12/31 (State EO and Federal Rule)

Area 3A Harvest 2007

User	Port	MeanWt	No. Fish	Yield (lb)
CHARTER	CCI	15.6	56,933	817,046
	Homer	16.5	93,933	1,553,105
	Kodiak	17.0	19,035	323,050
	Seward	13.4	37,051	496,868
	Valdez	26.3	11,515	303,180
	Whittier	20.4	11,497	235,089
	Yakutat	41.7	4,169	173,860
Area 3A		16.9	236,133	4,082,169
PRIVATE	CCI	14.5	38,247	554,601
	Homer	13.2	62,152	823,493
	Kodiak	17.6	16,302	286,414
	Seward	10.7	25,528	274,325
	Valdez	13.6	9,890	134,032
	Whittier	14.2	13,118	186,560
	Yakutat	19.5	1,101	21,497
Area 3A		13.7	166,338	2,280,921
OVERALL	Area 3A	15.6	402,471	6,283,081

Approximate 95% Confidence Intervals for Harvest Estimates (M lb):

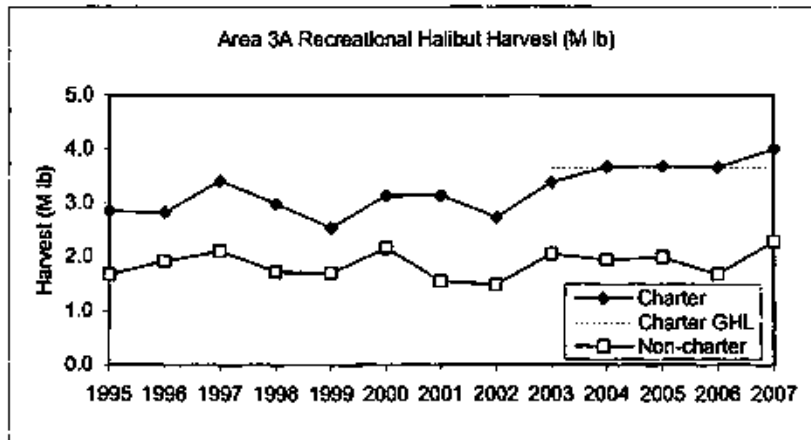
User	PointEst	StdErr	Lower	Upper
Charter	4.002	0.120	3.767	4.237
Private	2.281	0.104	2.078	2.484
Overall	6.283	0.150	5.989	6.577

Approximate 95% Confidence Intervals for Harvest Estimates (M lb):

User	Projected	Final	Proj Error(%)
Charter	3.404	4.002	-14.9%
Private	1.641	2.281	-28.1%
Overall	5.045	6.283	-19.7%

Area 3A Harvest 1995-2007

Year	Charter			Non-charter			Total Sport Harvest		
	No. Fish	Avg. Wt.	Yield (M lb)	No. Fish	Avg. Wt.	Yield (M lb)	No. Fish	Avg. Wt.	Yield (M lb)
1995	137,843	20.0	2.845	95,206	17.5	1.666	233,049	19.4	4.511
1996	142,857	19.7	2.822	108,812	17.6	1.918	251,769	18.8	4.740
1997	152,856	22.3	3.413	119,510	17.6	2.100	272,366	20.2	5.514
1998	143,388	20.8	2.965	105,876	16.2	1.717	249,244	18.9	4.702
1999	131,726	19.2	2.533	96,498	17.0	1.666	231,224	18.3	4.228
2000	159,609	19.7	3.140	128,427	18.9	2.185	288,036	18.4	5.305
2001	163,349	19.2	3.132	90,249	17.1	1.543	253,598	18.4	4.675
2002	149,608	18.2	2.724	93,240	15.9	1.478	242,848	17.3	4.202
2003	163,629	20.7	3.362	118,004	17.3	2.046	281,633	19.3	5.427
2004	197,208	18.8	3.688	134,960	14.4	1.937	332,168	18.9	5.606
2005	206,902	17.8	3.669	127,086	15.6	1.984	333,988	17.0	5.672
2006	204,115	17.9	3.664	114,987	14.6	1.674	319,002	16.7	5.337
2007	236,133	16.9	4.002	166,338	13.7	2.281	402,471	15.6	6.283



Recent regulatory regimes:

Year	Regulations in Place
1995-2006	Two-fish bag limit (no size restrictions), no limit on crew retention
2007	Two-fish bag limit (no size restrictions), state EO prohibiting crew harvest 5/1-12/31.

2007 Estimated Charter Halibut Harvest Using Logbook Numbers^a
 (based on logbook data as of 9/5/08)

Area	Port	2007 MeanWt (lb)	Logbook Harvest	Logbook Yield (lb)
Area 2C	Ketchikan	15.5	11,701	180,858
	POW Island	9.9	42,065	418,502
	PBG/WRG	21.9	5,916	129,677
	Sitka	18.5	34,051	628,920
	Juneau	12.0	9,140	110,105
	Haines/SKG ^b	12.0	159	1,915
	Glacier Bay	31.5	17,378	546,705
	Total	16.7	120,410	2,016,682
Area 3A	CCI	15.6	69,078	1,074,911
	Homer	16.5	98,372	1,626,500
	Kodiak-AKPen	17.0	19,305	327,632
	Seward	13.4	53,955	723,558
	Valdez	26.3	9,260	243,792
	Whittier	20.4	3,651	74,649
	Yakutat	41.7	3,023	126,069
	Total	16.4	256,644	4,197,110

^a - Estimate excludes harvest by "comped" (non-paying) passengers.

^b - Mean weight for Juneau applied to Haines/Skagway estimates.

2007 Saltwater Logbook Data

Information is based on there being a record of a halibut caught or released or both by an angler on a trip, i.e. if any angler caught or released a halibut on that trip, all the anglers on the trip are included. If two of six anglers caught or kept halibut, all six are counted.

IPHC Area*	Average # Anglers/Trip**	Total # Active Vessels	Average # Trips/Vessel	Total # of Anglers in 2007**
2C	3.98	709	33.61	94,887
3A	6.04	633	38.04	145,398

*IPHC Area is assigned by using the bottom stat area first, then the salmon stat area, then the port of offloading. This is necessary because of incidental catching and incomplete data reporting.

**Anglers include all people listed as fishing except crew members.

EXECUTIVE SUMMARY

The analysis contained in this document examines two alternatives for managing the charter halibut fisheries in International Pacific Halibut Commission (IPHC) Regulatory Areas 2C and 3A in the Gulf of Alaska. Alternative 1 is the No Action Alternative. Alternative 2 would create a catch sharing plan for the two areas, under which the Council would set initial allocations of halibut harvests between the charter sector and commercial Individual Fishing Quotas (IFQ) sector. This could accommodate seasonal increases in allocation, as needed, by allowing individual charter halibut limited entry permit holders to lease commercial halibut IFQ for use by anglers in the charter sector.

Environmental Assessment

The Environmental Assessment (EA) assesses the potential biological, social, and economic impacts of implementing regulations to set an initial sector allocation between the charter and commercial halibut fisheries in IPHC Regulatory Areas 2C and 3A.

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

The purpose of the proposed action is to (1) create a catch sharing plan that would set an initial allocation between the charter halibut and commercial longline halibut sectors, and tighten the timeline between occurrence of an overage and a management response; and (2) design a program to compensate the commercial sector for any future reallocations, above the level set at initial allocation. Along with restrictive control measures that were considered by the Council separately from these proposed actions, because the GHLL has been exceeded in Area 2C and Area 3A each year since its implementation in 2004, the proposed sector allocations are intended to stop the *de facto* reallocation from the commercial sector to the charter sector. Over the past 11 years, charter halibut harvests have grown at an annualized rate of 6.8 percent in Area 2C, and 4.1 percent in Area 3A. The number of active vessels, the total number of clients, the average number of clients per trip, and the average numbers of trips per vessel, are all at their highest level in the recorded data period of 1998 through 2006. The number of clients per trip (which is one of the best measures of upward pressure on demand) has increased steadily in recent years. This increase indicates that the number of clients is rising faster than the number of trips, and likely indicates healthy demand for the services provided by the charter sector.

List of Alternatives

While there appear to be just two alternatives under consideration, this is misleading. Alternative 2 contains multiple "options," as well as a series of six primary decision "elements." Therefore, the proposed action comprises a complex suite of management and regulatory permutations, some complementary, others mutually exclusive. As the analysis demonstrates, the action under consideration explores more than one configuration for Alternative 2 with which to contrast to the requisite "No Action" alternative.

Alternative 1. Status quo

Alternative 1 (No Action) would continue management of the charter sector under the Guideline Harvest Limit (GHL) program and harvest control measures. It includes current Federal and State regulations that would otherwise remain unchanged. Current Federal regulations for Area 2C include (1) a two-fish bag limit, with one of the two fish required to be 32 inches or less; (2) a prohibition on the catch and retention of halibut by charter vessel guides, operators, and crew; and (3) a limit on the number of lines used to fish

	Area 2C		Area 3A	
	50 percent of:	and 50 percent of:	50 percent of:	and 50 percent of:
a.	13.1 %	1.43 Mlb	14.1 %	3.65 Mlb
b.	16.4 %	1.69 Mlb	15.9 %	4.01 Mlb
c.	17.3 %	1.90 Mlb	15.4 %	4.15 Mlb

Element 2 – Annual regulatory cycle.

The initial charter allocation would be a common harvest pool for all charter limited entry permit holders. It would not close the fishery when the charter allocation is exceeded. Instead, the allocation would be linked to an annual regulatory analysis of management measures (delayed feedback loop) that take into account the projected CEY for the following year and any overages by the charter industry in the past year(s). This system would work best if there is not a time lag between the overage year and the year of implementation of new regulations. The Council will not revisit or readjust the sector split. An allocation overage would trigger the regulatory process automatically, in contrast with current GHL management. Any underages would accrue to the benefit of the halibut biomass and would not be reallocated or paid forward.

Element 3 – Management toolbox

Tier 1 measures will be utilized by the Council to try to manage the charter common pool for a season of historic length and a two-fish daily harvest limit. Tier 2 measures will be utilized if Tier 1 measures are inadequate to constrain harvest by the charter common pool to its allocation. Due to the delayed feedback loop in implementation of management measures, management measures will, in general, be more restrictive to ensure that the charter sector allocation is not exceeded. In providing predictability and stability for the charter sector, it is likely that charter fish may be left in the water.

Tier 1	Tier 2
One Trip per Vessel per Day	Annual Catch Limits
No Retention by Skipper and Crew	One Fish Bag Limit for all or a portion of the Season
Line Limits	Closure for all or a portion of the Season
Second Fish of a Minimum Size	
Second Fish at or below a Specific Length	

Element 4 – Timeline⁵. The current timeline for the proposal is as described below.

Example Scenario 1: four-year feedback loop

Charter fishery ends 2007

October 2008: Council receives ADF&G report on final charter halibut harvest estimates for 2007. If the ADF&G report indicates that an allocation overage occurred in 2007, the Council would initiate the analysis of management measures necessary to restrict charter halibut harvests to its allocations.

December 2008: Council reviews staff analysis (possibly in the form of a supplement) that updates the previous year's analysis with final 2007 harvest estimates.

January 2009: IPHC adopts combined catch limits for 2009.

February 2009: Council takes final action on management measures that would be implemented in year 2010.

Removals" and deduct the floating portion of the allocation from a combined charter and commercial sector fishery catch limit.

⁵ The Council has identified its preference for a three year timeline that includes an opportunity for adequate public comment period of the analysis prior to final action.

Winter 2009: NMFS publishes the rule that would be in effect for 2010.

Example Scenario 2: three-year feedback loop

Charter fishery, with in-season monitoring⁶, ends 2007

October 2007: Council receives ADF&G report on charter halibut harvest estimates for 2007. The report would likely be based on projections of the current year logbook data. Some data will still be in the process of being entered, so the data will be considered preliminary. If the ADF&G report indicates that an allocation overage occurred in 2007, the Council would initiate the analysis of management measures necessary to restrict charter halibut harvests to its allocations.

December 2007: Council reviews staff analysis (possibly in the form of a supplement) that updates the previous year's analysis with final 2007 harvest estimates.

January 2008: IPHC adopts combined catch limits for 2008.

February 2008: Council takes final action on management measures that would be implemented in year 2009⁷

Winter 2008: NMFS publishes the rule that would be in effect for 2009

Element 5 – Supplemental, individual use of commercial IFQ to allow charter limited entry permit holders to lease commercial IFQ, in order to provide additional anglers with harvesting opportunities, not to exceed limits in place for unguided anglers.

- A. Leasing commercial IFQ for conversion to Guided Angler Fish (GAF).
 1. A LEP (Limited Entry Permit) holder may lease IFQ for conversion to GAF for use on the LEP.
 2. Commercial halibut QS holders may lease up to 1500 pounds or 10 percent (whichever is greater) of their annual IFQ to LEP holders (including themselves) for use as GAF on LEPs. A CQE may lease up to 100 percent of its annual IFQ for use as GAF on their own LEPs.
 3. No more than 200-400 fish may be leased per LEP.
Suboption: LEPs w/endorsement for more than 6 clients may not lease more than 400- 600 fish.
- B. LEP holders harvesting GAF while participating in the guided sport halibut fishery are exempt from landing and use restrictions associated with commercial IFQ fishery, but subject to the landing and use provisions detailed below.
- C. GAF would be issued in numbers of fish. The conversion between annual IFQ and GAF would be based on average weight of halibut landed in each region's charter halibut fishery (2C or 3A) during the previous year as determined by ADF&G. The long-term plan may require further conversion to some other form (e.g., angler days).
- D. Subleasing of GAF would be prohibited.
- E. Conversion of GAF back to commercial sector
 1. GAF holders may request NMFS convert unused GAF into IFQ pounds for harvest by the owner of the Quota Share in compliance with commercial fishing regulations.
 2. Unused GAF may revert back to pounds of IFQ and be subject to the underage provisions applicable to their underlying commercial QS
Option a: automatically on October 1 of each year; or
Option b: upon the request of the GAF holder if such request is made to NMFS in writing prior to October 1 of each year.
- F. Guided angler fish derived from commercial QS may not be used to harvest fish in excess of the non- guided sport bag limit on any given day.
- G. Charter operators landing GAF on private property (e.g., lodges) and motherships would be

⁶ In-season monitoring is a mechanism that could shorten the feedback loop by one year.

⁷ The Council has asked that the analysis address what would be needed to implement a February preferred alternative in June of the same year.

- required to allow ADF&G samplers/enforcement personnel access to the point of landing.
- H. Commercial and charter fishing may not be conducted from the same vessel on the same day.

Element 6 – Catch accounting system

1. The current Statewide Harvest Survey and/or logbook data would be used to determine the annual harvest.
2. A catch accounting system will need to be developed for the GAF fish landed in the charter industry.
3. As part of data collection, recommend the collection of length measurements when supplemental IFQs are leased for use and compare to the annual average length to make sure that accurate removable poundage is accounted for and to allow length measurement information gathered to be used in the formulation of the average weight used in the conversion of IFQs to GAF.

Effect of Alternatives

The proposed alternatives address allocation of the Pacific halibut resource. The proposed alternative to the status quo would neither affect harvest levels nor fishing practices of individuals participating in the charter halibut fishery. The IPHC factors known resource removals into the halibut stock assessment when setting annual commercial longline catch limits. Therefore, none of the proposed alternatives is expected to significantly impact the halibut stock. None are expected to affect the physical environment, benthic community, marine mammals, seabirds, or non-specified groundfish species. There is insufficient data to evaluate whether groundfish stocks may be affected by the proposed alternative. There may be an effect on the human environment as there are winners and losers under any sector allocation.

Regulatory Impact Review

The economic impacts of the alternatives considered in this analysis are discussed in terms of the status quo and the elements and options under Alternative 2. The status quo allows the charter sector in Areas 2C and 3A to harvest up to (and beyond) the GHLs. The GHL is established annually for IPHC Areas 2C and 3A, and may be adjusted downward based on the total CEY that is determined by the IPHC. Such an adjustment occurred in Area 2C in 2008; the GHL was reduced from 1,432 Mlb to 931,000 lb. Alternative 2 would alter how the charter sector's catch limit is determined. An allocation to the charter sector in each of the two areas would be based on a combined commercial and charter catch limit that would be set annually by the IPHC⁸ as (a) a percentage; (b) a fixed poundage allocation; or (c) a combination of the two approaches. Alternative 2 also would allow charter limited entry permit holders to lease commercial halibut IFQ as a mechanism for individuals to increase the charter allocation above the initial charter sector allocation set by the Council under this action. The Guided Angler Fish (GAF) that would result from the commercial halibut IFQ would be converted from pounds to numbers of fish using an average halibut weight, as determined by the ADF&G. The same conversion factor would be used to convert GAF back into pounds of IFQ, if unused GAFs are returned to the commercial sector. GAF would be harvested under the same bag and size limits that are set for the unguided sport sector.

Alternative 1. Status quo

The status quo is defined by the management measures that are currently in place, or are expected to be in place in the near future. Projected charter harvests were calculated using those management measures. Those projections can then be compared to GHLs that are expected to be set, based on IPHC CEY projections.

If the charter sector's harvest exceeds the GHL (in year 1) based on a report by ADF&G (in year 2), NMFS would notify the Council of the overage, in writing within 30 days of being advised of the

⁸The IPHC currently only sets a commercial catch limit. However, their staff has indicated that they could establish an annual combined commercial and charter catch limit, if they were requested to do so by the Council.

average. The Council has identified a suite of management tools that it would consider for implementation if an overage occurs (in year 2 or 3). An appropriate combination of management measures in a new analysis could be implemented by the Secretary of Commerce to constrain charter harvests (in year 3 or 4).

Area 2C The Area 2C GHL was reduced from 1,432 Mlb to 931,000 lb in 2008. Status quo management measures in 2008 include the reduced GHL, the proposed halibut charter limited entry program, a 2-fish daily bag limit with a requirement that one of the two halibut be less than or equal to 32", a prohibition on harvesting of halibut by captain and crew, and a line limit that is set equal to the number of clients on the vessel, or six lines, whichever is fewer. NMFS currently is preparing a new analysis and rulemaking to implement a 1-fish bag limit in Area 2C for the 2009 charter season. This follows implementation of a 1-fish bag limit that NMFS implemented on May 28, 2008⁹ at 73 FR 30504.

A temporary restraining order on the 1-fish bag limit was granted on June 10, 2008¹⁰. An amended order was issued on June 13, 2008¹¹. And a preliminary injunction was granted on June 20, 2008¹². A NMFS news release¹³ summarizes court decisions that rescinded the 1-fish bag limit.

The United States District Court for the District of Columbia has imposed a preliminary injunction against new regulations in Southeast Alaska for sport charter halibut fishing. That means a two-fish bag limit for sport charter halibut fishermen, instead of the one-fish bag limit which was part of new regulations for the area.

The preliminary injunction follows a temporary restraining order, both with the effect of limiting halibut harvest on a charter vessel in International Pacific Halibut Commission Area 2C (Southeast Alaska) to no more than two halibut per person per calendar day provided that at least one of the harvested halibut has a head-on length of no more than 32 inches (81.3 cm). If a person sport fishing on a charter vessel in Area 2C retains only one halibut in a calendar day, that halibut may be of any length. Also, the carcass retention requirement from last year is in effect under the preliminary injunction issued by the Court.

The suspended regulations would have limited sport charter vessel anglers to keeping one halibut per calendar day in Area 2C. The purpose of the suspended regulations was to keep halibut harvests in Area 2C within the guideline harvest level established in federal regulations, as recommended by the North Pacific Fishery Management Council.

NOAA Fisheries is reviewing the Court's decision from the June 20 hearing and will make a determination on how to proceed in the very near future. No new court date has yet been set. All other requirements and limitations that were published with the suspended regulations are still in effect. These requirements and limitations include the maximum line limits and the prohibition of retention of halibut by a guide, operator, or crew. Please refer to 50 CFR sec. 300.65 and 300.66 for details.

Area 3A The GHL remains unchanged at 3.650 Mlb in Area 3A. Because no new information is available to indicate whether an overage occurred in 2007, and by how much, the analysis assumes that the management measures will remain unchanged¹⁴. A two-fish daily bag limit, a prohibition on halibut harvests by skipper and crew, and line limits equal to the number of paying clients aboard the vessel are assumed to be in place for the entire 2007–2011 time period. The charter limited entry program is also

⁹ http://www.fakr.noaa.gov/frules/73fr30504_1.pdf

¹⁰ <http://www.fakr.noaa.gov/sustainablefisheries/halibut/charter/courtorder0608.pdf>

¹¹ <http://www.fakr.noaa.gov/sustainablefisheries/halibut/charter/amendedorder061308.pdf>

¹² <http://www.fakr.noaa.gov/sustainablefisheries/halibut/charter/order062008.pdf>

¹³ <http://alaskafisheries.noaa.gov/newsreleases/2008/halibut062308.htm>

¹⁴ In mid-September 2008, ADF&G will release estimates of 2007 charter halibut harvests. The Council is scheduled to review the ADF&G report and possibly select a preferred alternative from a supplemental analysis of possible management measures to limit charter halibut harvests in Area 3A in the event of an overage at the same October 2008 meeting that the Council will select a preferred alternative for this action.

assumed to be in place in the future, but it is not expected to impact the amount of charter harvest. Client demand in Area 3A is assumed not to change as a result of maintaining these management measures.

Projections Because changes in the size limit of the second fish are expected to impact client demand in Area 2C, harvest projections are included that account for that demand change. A projection was also made that assumed no change in client demand. Because of uncertainty in changes in client demand, the two projections were averaged to calculate the point estimates used in this analysis¹⁵. The harvest projections using the other demand assumptions are included in the analysis, but for simplicity are not directly compared to the allocation options.

Charter harvest projections were provided by the Northern Economics, Inc (NEI) staff for the years 1995 through 2011. Harvest projections were made using an ARIMA model. Estimates included 95 percent confidence intervals around the harvest point estimates. The reader is cautioned that the standard errors and the resulting 95 percent confidence intervals represent the confidence intervals associated with our estimates of the mean harvest estimate. They are not 95 percent confidence intervals for the harvest itself. In other words the analysis estimates the mean harvest prediction not a 95 percent confidence interval of harvest itself. For more information see Section 0.

Projections for the years 2007 through 2011 are used to compare projected charter harvest to various charter allocations Table A- ES-1). Comparing the Area 2C harvest projections and the GHL estimates that were provided by the IPHC indicates that the charter sector would not stay within its allocation from 2008 through 2011. The GHLs from 2007 through 2011 fall outside of the 95 percent confidence intervals for the means estimated for those years. Therefore, implementing a two-fish daily bag limit and requiring that one of the fish be no greater than 32 inches in Area 2C is expected to allow the charter sector to harvest more than their GHL over the time period being considered. Stricter management measures would likely be required to keep the charter sector within its GHL. *These projections will be too low if harvest effort or average weights go up suddenly. These increases will erode the estimated harvest savings of the management measures and harvest could be more similar to the unadjusted projection than the adjusted projection.*

Charter harvests in Area 3A are projected to increase every year from 2007 through 2011. It is projected to increase to about 3.5 Mlb. Harvest projections indicate the charter sector would stay within its 3.65 Mlb GHL every year, during 2007 through 2011. *This projection assumes that skipper and crew have been reporting their harvest as charter harvests in the Statewide harvest surveys. If this assumption is incorrect then harvest will be higher by approximately 10 percent and above the GHL.* Based on those projections, additional charter harvest restrictions would not be required to keep the fleet within its GHL. However, because of the trend that indicates the charter harvest is increasing, the charter fleet may exceed their GHL in the future.

See Sections 2.5.2 and 0 for a discussion of the unadjusted and adjusted harvest projections and below for figures showing the adjusted and unadjusted projections.

¹⁵ Appendix A provides a detailed discussion of the models used to project future ADF&G harvest estimates and the rationale for using the average of the high and low harvest projections.

Table A- ES-1 Projected charter harvest and GHL under the status quo, 2007–2011

Year	IPHC Area 2C				IPHC Area 3A			
	Projected Harvest (Mlb)	Lower 95% CI (Mlb)	Upper 95% CI (Mlb)	GHL (Mlb)	Projected Harvest (Mlb)	Lower 95% CI (Mlb)	Upper 95% CI (Mlb)	GHL (Mlb)
2007	1.456	1.376	1.536	1.432	3.152	3.003	3.300	3.65
2008	1.496	1.406	1.586	0.931	3.372	3.206	3.539	3.65
2009	1.570	1.470	1.671	1.074	3.482	3.297	3.667	3.65
2010	1.624	1.513	1.735	1.217	3.473	3.270	3.677	3.65
2011	1.693	1.571	1.815	1.432	3.560	3.338	3.782	3.65

Source: IPHC estimates of GHL and NEI estimates of charter harvest.

CAVEATS: The accuracy of the adjusted harvest projections in both Areas are subject to certain caveats. Charter harvest in Area 3A depends on whether or not skipper and crew have been reporting their halibut harvest as charter harvest. If they have been reporting it (as assumed in this analysis) then harvest is expected to be generally near or below the GHL. If skippers and crew have not been reporting their harvests while under charter in the SHWS, then no reduction in harvest from the skipper and crew ban on retaining halibut is expected. Under those circumstances actual harvest in Area 3A will more closely match the unadjusted harvest projection, which will exceed the GHL. Additionally, in Area 2C if the estimated effect of length restrictions instituted in 2007 by NMFS is eroded by increasing harvest effort or increasing average weights then overall actual harvest will more closely match the unadjusted harvest projection, which will exceed the GHL in Area 2C (Figure ES-1 and Figure ES-2).

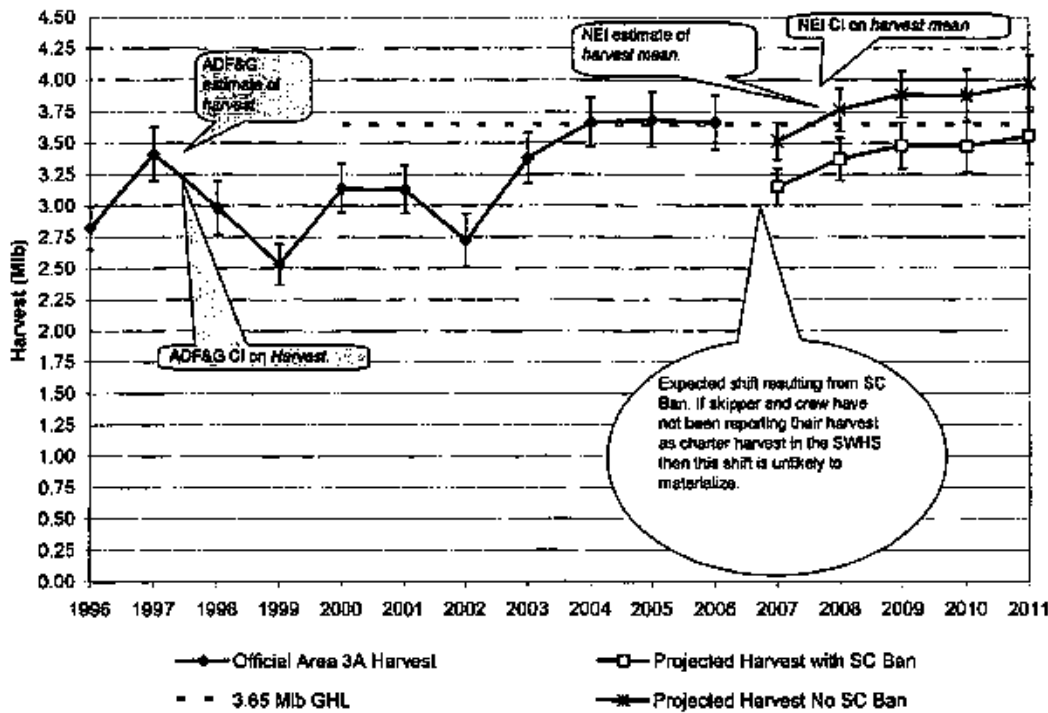


Figure ES-1 Past Area 3A harvests compared with model estimates of the mean of future harvests adjusted for a ban on skipper and crew harvest

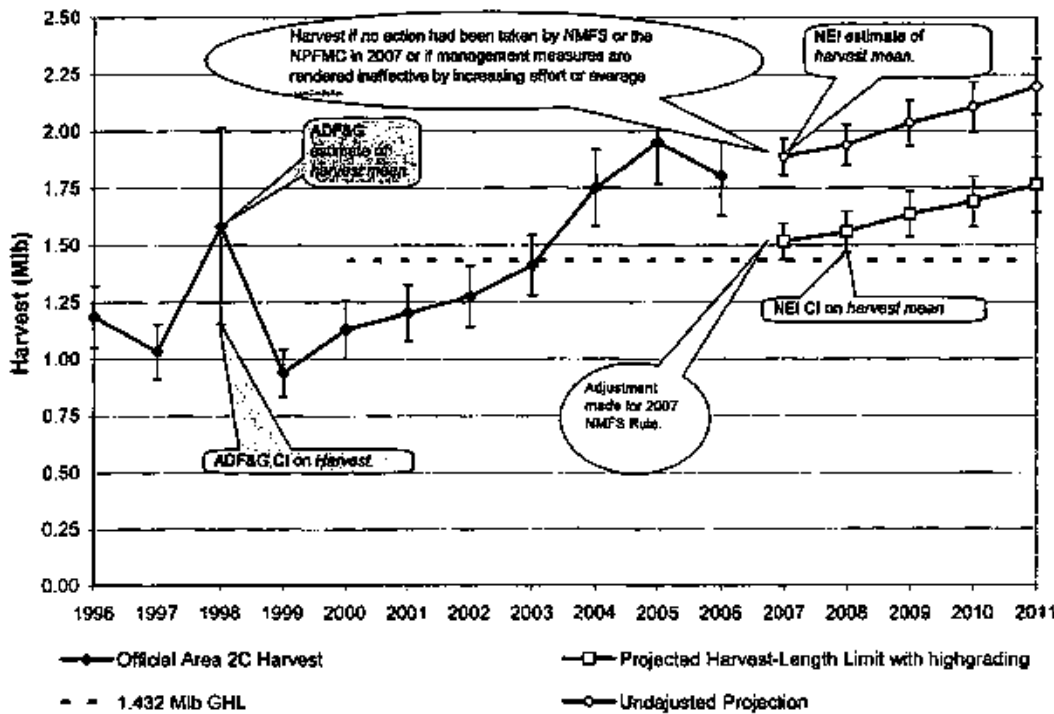


Figure ES-2 Past Area 2C harvests compared with model estimates of the mean of future harvests adjusted for actual 2007 management measures continued through 2011

Alternative 2. Establish a catch sharing plan that includes sector accountability

Element 1 – Initial Allocation

Element 1 would revise Federal halibut regulations to create a catch sharing plan for charter and commercial IFQ sectors in Areas 2C and 3A. Common pool allocations would be set for harvest by charter clients of charter LEP holders from a combined charter and commercial IFQ catch limit (set by the IPHC each year); the remainder would be allocated to the commercial IFQ sector. If the charter allocation is exceeded, the fishery would not be closed in-season. Instead, when an overage occurs, additional management measures would be implemented in future years to constrain harvests to the allocation. The timeline of how long it would take to determine when an overage has occurred, and when new management measures would be implemented, are discussed under Element 2. The system would work best if the time lag between the overage and when constraining management measures are implemented is minimized. However, it is anticipated that a two or three year lag may be unavoidable. Clients must abide by any annual, bag, or size limits that are in place for the halibut charter sector in an area when harvesting from the common pool. GAF may allow charter LEP holders to offer their clients the opportunity to harvest halibut under the same (presumably more liberal) regulations as those that apply to the unguided halibut sportfishing sector. Any such halibut, harvested outside of the charter fishery regulations, must be identified as GAF (or will be the subject of an enforcement action).

The Council is considering three basic methods to determine the size of the common pool allocation to the charter sector. The first method has four allocation options based on fixed percentages of a combined commercial and charter catch limit. The percentages are determined by using formulas based on historic charter harvest. The second method has three allocation options based on a fixed number of pounds of halibut. A suboption would cause the fixed pounds to vary, in steps associated with predefined changes in the area-specific CEY or combined commercial and charter catch limit. The suboption causes the fixed pound allocation to behave like a percentage based allocation that changes the amount of halibut assigned to the charter sector in predefined steps. The third set of options combines fixed pounds and fixed percentages; it uses half of the result from the fixed pound allocation and half the result of the fixed percentage option for the same base time period.

Charter harvest estimates were compared to each charter sector allocation to show which allocations would fund the common pool, without the need to impose additional or different management measures. Option 1a is calculated using 125 percent of the 1995 through 1999 average charter harvest (current GHL formula). That option results in the charter sector being allocated 13.1 percent of the combined commercial and charter catch limit in Area 2C, and 14.0 percent in Area 3A. IPHC staff has provided estimates of projected commercial and charter catch limits for the years 2007 through 2011 (Table ES-2). The catch limits incorporate the “slow up, fast down” methodology that is used by the IPHC.

Table A- ES-2 Combined commercial and charter catch limit using slow up-fast down

Year	2C	3A
2007	10.21	33.00
2008	7.91	27.62
2009	6.81	28.33
2010	6.76	30.29
2011	7.06	33.00

Source: IPHC

The projected poundage allocations that result during 2007-2011 are outside of the 95 percent confidence intervals of projected harvest in Area 2C. On average, the charter sector is projected to exceed its allocation by 552,000 lb per year over the five-year period. The reverse is the case in Area 3A, where the allocation is projected to exceed the charter harvest by an average of 886,000 Mlb per year.

Option 1b (125 percent of the 2001 through 2005 average charter harvest - GHl formula updated through 2005) results in the charter sector being allocated 17.3 percent of the combined commercial and charter catch limit in Area 2C, and 15.4 percent in Area 3A. The Area 2C allocation is projected to exceed charter harvest during 2007. During 2008 through 2011, the charter allocation is projected to fall below the 95 percent confidence intervals for charter harvest. Over the five-year average, the charter sector is projected to be over its allocation by an average of 230,000 lb. In Area 3A, the charter sector allocation is projected to exceed their harvest every year, during 2007 through 2011. *Both of these estimates are subject to the caveats noted above.*

Option 1c (current GHl as percent of 2004) results in the charter sector being allocated 11.7 percent of the combined commercial and charter catch limit in Area 2C, and 12.7 percent, in Area 3A. The Area 2C allocation is projected to be less than the charter sector's harvest each year. Over the five-year period, the charter sector is projected to exceed its allocation by an average of 660,000 lb per year. In Area 3A the charter allocation is projected to exceed their harvest each year. They are projected to harvest an average of 460,000 lb less than they would have been allocated, from 2007 through 2011.

Option 1d (2005 charter harvest) would yield an allocation of 15.1 percent of the combined commercial and charter catch limit in Area 2C, and 12.7 percent in Area 3A. The Area 2C allocation is projected to exceed charter harvest during 2007. During 2008 through 2011, the charter allocation is projected to be less than the 95 percent confidence interval for charter harvest. Over the five-year average, the charter sector is projected to be under its allocation by an average of 400,000 lb. In Area 3A, the charter sector allocation is projected to exceed its allocation every year during 2007 through 2011. Over that five-year period the charter sector would exceed its allocation by 460,000 lb per year. The Area 3A allocation is the same under both Options 1c and 1d.

The allocations under Option 2 would issue the charter sector a fixed number of pounds every year. Option 2a would allocate the Area 2C charter sector 1.43 Mlb per year, and the Area 3A charter sector would be allocated 3.65 Mlb per year. Option 2b would allocate the Area 2C charter sector 1.69 Mlb per year, and the Area 3A charter sector would be allocated 4.01 Mlb per year. Option 2c would allocate the Area 2C charter sector 1.90 Mlb per year, and the Area 3A charter sector would be allocated 4.15 Mlb per year. Allocations of that magnitude are projected to exceed the charter sector's harvest almost every year under Options 2b and 2c. The allocation under Option 2a is projected to fall within the 95 percent confidence interval for harvest in 2007 and 2008. During 2009 through 2011 the allocation is projected to be insufficient to meet harvest. In Area 2C, the charter sector's allocation is projected to be less than its harvest by an average of 140,000 lb (Option 2a). Its allocation is expected to exceed its harvest by an average of 120,000 lb (Option 2b), and 330,000 lb (Option 2c) over the 2007 through 2011 time period. In Area 3A, charter allocations are projected to exceed its harvest by an average of 240,000 lb (Option 2a), 600,000 lb (Option 2b), and 740,000 lb (Option 2c), over that same time period.

The suboption would implement a stair step up and stair step down that adjusts the charter allocation when the total CEY or combined commercial and charter catch limit changes a predefined amount. The starting point from which changes are measured is projected to have a substantial impact on future allocations in Area 2C. Allocations based on a stair-step using historic area-wide CEYs will tend to reduce the charter allocation. Allocations based on a stair-step using 2008 coast-wide CEY is projected to increase the allocation over time. Stair-steps that are linked to the 2008 combined commercial and charter catch limit do not trigger a change in the allocation over the time period being considered.

If Option 2a were selected, no changes would occur to the charter allocation when the CEY changes by less than 15 percent from the baseline amount. Changes greater than that amount, would trigger adjustments in the charter allocation. The first step changes the initial allocation by 15 percent, in the direction of the CEY or combined catch limit change. Each additional 10 percent change triggers an additional 10 percent change in the charter sector's allocation, again, in the same direction. In Area 2C, the first step is triggered by a 15 percent change in the CEY or combined catch limit, and results in the

allocation increasing (decreasing) 210,000 lb. In Area 3A, the allocation is changed by 550,000 lb. Each additional 10 percent increase (decrease) in the CEY results in the charter sector's allocation increasing (decreasing) 140,000 lb in Area 2C, and 360,000 lb in Area 3A.

Because the initial allocation is larger under Option 2b, the changes in the allocation at each step are also larger. In Area 2C, the initial 15 percent increase (decrease) in the allocation increases (decreases) the amount by 250,000 lb. Each additional 10 percent increase (decrease) increases (decreases) the allocation by 170,000 lb. In Area 3A, the initial change is 600,000 lb, and each additional 10 percent change adjusts the allocation by 400,000 lb.

Since the initial allocation is larger under Option 2c than either of the other two options, the changes in the allocation, at each step, are also larger. In Area 2C, the initial 15 percent increase (decrease) in the allocation increases (decreases) the amount by 280,000 lb. Each additional 10 percent increase (decrease), increases (decreases) the allocation by 190,000 lb. In Area 3A, the initial change is 620,000 lb, and each additional 10 percent change moves the allocation by 410,000 lb.

Option 3 allocations are based on 50 percent of the percentage allocation and 50 percent of the fixed pound allocation. Because the allocations are based, in part, on fixed pounds, the charter sector allocation has a floor below which the allocation would not decrease, unless resource conservation considerations dictate a reduction. By design, the allocations under Option 3 always fall between the allocations that would occur using the same years under Options 1 and 2. *When biomass is increasing, however, the allocation is smaller than the percentage based alternatives under Option 1, using the same base period years. A decreasing biomass will result in the allocation being smaller than the fixed poundage allocation, but larger than the percentage based allocation.*

Option 3a (based on 1995 through 1999) results in an Area 2C allocation that is projected to be within the 95 percent confidence interval of 2007 harvest. During 2008 through 2011, the allocation is projected to be less than the charter harvest. Over the five-year period, on average, the charter sector's allocation is projected to be 350,000 lb less than its harvest. In Area 3A, the allocation is projected to exceed harvest every year. Over the five-year period, on average, the charter sector's allocation is projected to be 560,000 lb over its projected harvest.

Option 3b is based on the years 2000 through 2004. Because those years were not included as the baseline in an alternative under Option 1, the percentage was calculated for Option 3 using the same formula used in Options 1a and 1b. Option 3c is based on the years 2001 through 2005. Both Options 3b and 3c are projected to yield allocations that are larger than the charter sector's projected harvest during 2007. In 2008 the charter allocation is expected to fall within the 95 percent confidence interval for charter harvest. Charter harvests are projected to exceed the allocation from 2009 through 2011. In Area 2C, the charter harvests, on average, are projected to exceed the Option 3b allocation harvest by 110,000 lb, and the Option 3c harvest, by 160,000 lb. In Area 3A, the allocations, on average, are projected to exceed the Option 3b harvest by 1.02 Mlb, and the Option 3c harvest, by 600,000 lb.

In summary, the only allocations that would exceed the status quo harvest projections are Option 2b and Option 2c in Area 2C. All other allocation options are projected to be less than needed for the allocation proposed, given the status quo management measures. In Area 3A all of the allocations are projected to be sufficient to meet projected harvest over the time period considered. However, if the growth trends of harvest continue into the future, the fixed poundage options (Options 2a through 2c) are projected to result in the need for more restrictive management measures before the other allocations.

Element 2 – Annual regulatory cycle

Management of the charter halibut sector to its allocation would be achieved through an annual (if necessary) regulatory analysis of management measures that takes into account the projected CEY for the following year and any overages by the charter industry in the past year(s). No regulations would be implemented to achieve this policy objective.

The Council has announced that its policy under Element 2 would be to allow the charter halibut season to remain open and fishing to continue for the specified season, operating under whatever restriction(s) would be in effect. In other words, the Council would not seek to monitor the harvest inseason, and close the fishery when the allocation is reached. Rather, it believes its restrictions would be sufficient to achieve the sector allocation. The Council would not revisit or readjust the sector split. Any overages or underages would be accounted in the IPHC stock assessment and halibut biomass estimate. Operationally, overages would result in a modest decrease in the combined charter and commercial longline IFQ allocation in the following year. Underages would accrue to the benefit of the halibut biomass and all user groups but would not be reallocated to the charter sector in the subsequent fishing year.

The Council has wrestled with what has been described as a "delayed feedback loop," within the confines of State of Alaska data availability and Federal rulemaking. Three to four years may elapse between the years in which (1) an overage occurs; (2) ADF&G reports that an overage has occurred; (3) the Council selects a preferred alternative to address the overage; and (4) new regulations are in effect.

The Council could select a policy for selecting a preferred alternative that would reduce the time between a charter allocation overage and implementation of regulations to eliminate the overage. The Federal rulemaking requirements are unchanged and the Council plans to use the ADF&G Statewide Harvest Survey (SWHS) data that is released in September each year, therefore only the Council process can be streamlined to achieve its objective. Because the timing of the release of the SWHS data does not allow for the development of a RIR/IRFA in October, only a supplement to a previous analysis could be prepared in time for Council review and action in October each year. NMFS has recommended the Council select its preferred alternative for the next year's charter season by October and for Council staff to submit the completed RIR/IRFA by mid-October to facilitate implementation for the following season. Implementation likely would occur no sooner than June each year. If this schedule can not be met, then regulations would be implemented for the subsequent fishing year. Alternate policies are discussed under Element 4.

Depending on the initial allocation and amount of IFQ leasing that occurs in each of the regulatory areas, between none and two catch sharing plans (CSP) analyses could be submitted each year (one each for Area 2C and Area 3A), or they could be combined into a single analysis and rulemaking. Some streamlining during regional review may occur as these analyses become annual updates of previously reviewed documents, as compared with wholly original analyses. No resolution to a bottleneck is foreseen in which CSP analyses compete with other higher priority analyses for review and implementation.

Element 3 – Management toolbox

The Council has announced that its policy under this element would be to select a preferred alternative from the list of possible management measures from its 'toolbox' for a future analysis and rulemaking after it has been notified that a charter sector allocation has been exceeded. The estimated effects of potential management measures are provided only to illustrate how the Council's policy may be implemented in the future. The Council would select the tool (or tools) that allow it to reduce charter harvest to the allocation.

Element 3 would establish two tiers of measures that the Council may utilize to manage the charter common pool allocation (Table ES-3). Tier 1 measures would be considered by the Council to manage the charter common pool allocation for a season of historic length and a two-fish daily harvest limit. Tier 2 measures would be utilized if Tier 1 measures are inadequate to constrain charter harvest to its allocation. Due to the inherent delay in implementation of regulations after an overage, management measures may be disproportionately restrictive to the estimated level of reduction, to ensure that the charter sector allocation is not exceeded in the future. In providing predictability and stability for all those that use this resource, the full charter allocation may not be harvested in every year and/or every area. No regulations would be generated under Element 3.

Table A- ES-3 Proposed Management Measures by Tier

Tier 1	Tier 2
One Trip per Vessel per Day	Annual Catch Limits
No Retention of Halibut by Skipper and Crew	One Fish Bag Limit for all or a portion of the Season
Line Limits	Closing the charter fishery for all or a portion of the Season
Second Fish of a Minimum Size	
Second Fish at or below a Specific Length	

Table A- ES-4 Estimated Effect of Management Measures

Tier	Management Measure	Sub-Option	Estimated Harvest Reduction	
			Area 2C	Area 3A ¹
Tier 1	One Trip per Vessel per Day	None	1.8% – 2.4%	5.5% – 6.3%
	No Retention by Skipper and Crew	None	4.3% – 4.7%	10.4%
	Line Limits ²	None	Not Analyzed	Not Analyzed
	Second Fish of a Minimum Size ³	45"	18.8% – 27.0%	32.5% – 39.3%
		50"	23.1% – 30.8%	36.9% – 43.3%
	Second Fish at or below a Length Limit ⁴	32 Inches	19.7% – 26.1%	18.2% – 24.5%
34 Inches		Not Analyzed	15.2% – 21.1%	
36 Inches		Not Analyzed	12.1% – 18.3%	
Annual Catch Limits	Four Fish	16.4%	6.5%	
	Five Fish	9.3%	4.1%	
	Six Fish	4.3%	2.1%	
Tier 2	One Fish Bag Limit for All or a Portion of the Season ⁵	Full Season	39.7% – 57.8%	47.1% – 62.9%
		May	1.8% – 2.6%	5.0% – 6.6%
		June	10.0% – 14.6%	12.4% – 16.5%
		July	14.5% – 21.1%	17.8% – 23.8%
		August	12.0% – 17.5%	9.9% – 13.2%
		September	1.4% – 2.0%	1.8% – 2.9%
Season Closure ⁶	Full Season	100.0%	100.0%	
	May	5.2%	10.5%	
	June	25.7%	26.0%	
	July	35.4%	37.7%	
	August	29.9%	21.2%	
	September	3.7%	4.0%	

1. Numbers for Area 3A reflect the analysis for NPFMC (2007c) updated with ADF&G's final 2006 harvest estimates.
 2. Neither NPFMC (2007b) nor NPFMC (2007c) analyzed line limits as an individual option.
 3. Upper estimates for each Area include an assumption of a 10 percent reduction in the demand for halibut charter trips.
 4. Upper estimate assumes that anglers catch the average fish below the length limit based on biomass. Lower estimate assumes that anglers are able to high-grade by one two-inch size class.
 5. Upper estimates include an assumption of a 30 percent reduction in the demand for halibut charter trips. The analysis did not make any adjustments for anglers rescheduling their trips to other parts of the season which do not include the one-fish bag limit.
 6. Estimates based on ADF&G data provided for NPFMC (2007b) and NPFMC (2007c). Estimates do not include the effect of anglers migrating to other months or otherwise adapting to the closure.
 Source: NPFMC (2007b) and NPFMC (2007c).

Element 4 – Timeline

Element 4 is linked to discussions of an annual regulatory cycle under Element 2 and a management toolbox under Element 3. The Council has announced that it would identify its policy for setting a timeline for initiating new rulemaking once it has been notified of a charter allocation coverage. The preferred regulatory timeline would be identified in the text of the catch sharing plans (CSP). No regulations would be generated as a result of Element 4. The estimated effects of potential timelines are provided to illustrate how the Council's preferred policy may be implemented in the future.

Element 4 outlines two scenarios for the timing of the selection of a preferred alternative for future regulatory actions. The primary difference between the two proposed scenarios is when ADF&G provides an estimate of charter harvests (step 2), i.e., post-season or in-season.

The Council may select its preferred approach from one or more of those described below or an as yet not previously identified approach.

- A. Schedule final action in December. The Council could save one meeting cycle by basing its new RIR/IRFA on the previous, final analysis and proceeding straight to final action; it would not schedule an initial review of the analysis (which is Council policy and not a Federal requirement). The Council could review the previous RIR/IRFA in the context of the ADF&G report on the latest calendar year estimates of sport halibut removals and consider that its initial review of the proposed action.

The RIR/IRFA would incorporate the most recent year of data and undergo a routine update. Final action would be scheduled in December to incorporate ADF&G charter halibut harvest estimates, which are released in early to mid September each year. It is not possible to prepare a revised RIR/IRFA for either one or both regulatory areas in the two weeks between the time when ADF&G releases the data and the October Council meeting. A December final action would allow 2-4 weeks for public review of the analysis.

A critical problem with this approach is that NMFS does not believe that receiving the analysis from the Council in mid to late December allows sufficient time to implement the rule in time for the next charter halibut season.

Option. Forego SSC review of the RIR/IRFA. The Council could forego SSC review of the revised analysis since the analytical methodology has previously been approved by the SSC and Council. The analysis includes only an additional year's data and harvest projections. Or the Council could schedule SSC review in December, take final action in December, and task staff with addressing SSC comments prior to submitting the analysis to the Secretary.

- B. Prepare a supplemental analysis (only) prior to Council action. The Council could select its preferred alternative based on a supplemental analysis since the preparation of an RIR/IRFA prior to the selection of a preferred alternative is a Council policy only. The supplemental analysis could be a 2-3 page document provided to the Council prior to the October Council meeting. It would be similar to that prepared for Area 2C GHL measures in 2007 [http://www.fakr.noaa.gov/npfmc/current_issues/halibut_issues/Area2CGHL_Sup1007.pdf]. A complete, revised EA/RIR/IRFA would be prepared by Council staff immediately after final action and submitted to the Secretary.
- C. Dual preferred alternative. The Council could select alternate preferred alternatives (presumably in October based on a supplemental analysis) for management restrictions for the charter sector prior to the determination of the allocation by the IPHC (in January) using the Council's CSP. A proposed rule could be published prior to IPHC action and solicit comments on both preferred alternatives or the proposed rule could be published after IPHC action and solicit comments on the remaining preferred alternative that would result from application of the CSP to the combined charter and

commercial longline IFQ allocation, which was determined by the IPHC. It is possible that more than two preferred alternatives could be selected by the Council, depending on the CSP formula for sector allocations of the combined charter and commercial IFQ allocation.

- D. Rulemaking would not depend on IPHC action under a fixed allocation. Public confusion would be minimized if the identification of the Council's preferred alternative for future management restrictions was not dependent on the actions of the IPHC (in setting the combined charter and commercial IFQ allocations). Clarity in the supplemental analysis, Secretarial draft of the RIR/IRFA, proposed rule, and final rule would facilitate Secretarial action.
- E. Separate rulemaking for management measures. Development of *separate* rulemakings for restrictive charter halibut management measures and IPHC annual management measures would facilitate the implementation of measures that are necessary to start the commercial IFQ fishery. Some stakeholders have suggested that charter halibut management measures be included in the rulemaking for IPHC actions to speed its implementation; however, the requirement to respond to what may be numerous comments to possibly controversial, proposed charter halibut regulations could jeopardize timely implementation of commercial regulations. Further, only a final rule is published for annual commercial halibut regulations that are recommended by the IPHC; publication of a proposed rule for restrictive management measures is still required.

Element 5 – Supplemental, exclusive use of Guided Angler Fish

Element 5 would revise commercial halibut IFQ regulations to allow halibut charter LEP holders to lease commercial IFQ from commercial QS holders. Such leases would provide guided anglers with additional harvesting opportunities, in excess of the annual charter common pool allocation. The LEP holder would request NMFS Restricted Access Management Program to convert the leased IFQ into Guided Angler Fish (GAF). When using GAFs, guided angler's harvesting opportunities would never exceed the daily bag and size limits in place for unguided halibut sport fishing anglers.

The most important implications under Element 5 include the following.

- In Area 3A, the proposed IFQ leasing levels should provide adequate GAF to preserve historic harvest opportunities, and allow charter sector growth in the near future.
- In Area 2C, the proposed IFQ leasing levels may inhibit charter sector growth by 2011 depending on 1) which allocation the Council selects; 2) future growth in the number of charter clients; and 3) halibut biomass in that area.
- IFQ, and consequently GAF, availability will vary with biomass, average weights, and IPHC policy decisions.
- There are little data to suggest what price LEP holders might pay for leasing GAF.
- The element contains GAF-equivalent leasing limits for LEP holders. LEP on vessels with an endorsement for 6 or fewer passengers would be limited to leasing 200-GAF or 400-GAF per season. The element contains a sub-option whereby LEPs used on vessels with passenger endorsements greater than 6 could lease 400-GAF or 600-GAF. The higher leasing allowances (e.g., 400-GAF, 600-GAF) would preserve historic harvest opportunities under a restrictive management regime such as a one-fish bag limit. The exception is for approximately 15 percent of the fleet in Area 3A, which has higher than average harvest levels. These vessels would need higher GAF leasing limits under a one-fish bag limit.
- For determining average harvest weights:
 - The current system of calculating average charter harvest weights from the previous year would not be available for IFQ conversion until the end of the following season. For

example, the final estimate of average weight for 2007, would not be available until September 2008;

- If there is a change in the average weight from year to year, it would become apparent the following year that the charter operator paid either too much, or too little for GAF. Since the conversion is a linear function of the average weight, the percentage error in the amount of IFQ converted would equal the percentage difference in the average weights from year to year. These differences would likely cancel out only for charter LEP holders and IFQ holders who convert on a regular basis over an extended number of years, assuming all else is equal;
- The time lag in estimation of average weight may also affect catch accounting. It is assumed that GAF harvest is tallied as commercial catch, since it is converted from IFQs (i.e., it will not count against the charter common pool allocation). Because the conversion of IFQ to GAF would likely be based on preliminary estimates of average weight from the previous year, the accurate accounting of GAF removals could not be obtained until the final estimates of harvest are available the following year. The degree to which this accounting error becomes an issue depends on the magnitude of GAF conversions. If conversions are a small proportion of the commercial catch limit, the error may not be worth addressing;
- Perhaps a more important consideration is whether the average weight of the charter harvest (common pool) should be used to convert IFQ for GAF, or whether the average weight of GAF should be used. The average weight of GAF may be higher than the average weight of all charter halibut under certain conditions. In addition, the average weight of GAF would be dependent on the distribution of harvest among subareas of Area 2C or Area 3A. Average weight currently varies quite a bit from port to port. If a high proportion of GAF are harvested from areas with larger fish, this would result in a higher average weight. Alternatively, if GAF are utilized late in the season, when supplemental halibut are needed to continue operation (i.e., the common pool is depleted), the average size fish may be smaller, due to local depletion caused by removals earlier in the season;
- Under certain conditions that average weight of GAF may not exceed that of common pool fish. For example, if the charter fishery is restricted by a one-fish bag limit, then common pool fish may have a higher average weight than GAF, due to high-grading. Under a one-fish limit, some anglers would try to harvest the largest fish possible.

Element 6 – Catch Accounting System

Element 6 encompasses the record keeping and reporting requirements to implement the Council's preferred alternative. An interagency working group has developed a draft implementation plan for the proposed action. If adopted by the Council, and approved by the Secretary, the Council's preferred alternative could be implemented no sooner than 2010.

Economic Impacts of the Alternatives

The analysis assumes that the proposed charter sector allocation would be a common pool of fish that clients of charter LEP holders would be allowed to harvest. Bag limits, seasons, and other management measures would be set pre-season to achieve the allocation, and there would be no inseason harvest monitoring (of common pool fish) or regulatory changes. Exceeding the common pool allocation would result in more stringent management measures being implemented to reduce harvest in future years. The leasing of commercial IFQ may also be allowed under this amendment. Leasing of IFQ would allow individual charter LEP holders that hold GAF, to use those fish to exceed charter harvest regulations (up to the regulations for the unguided sport fishery).

This analysis does not provide quantitative estimates or confidence intervals for the magnitude of net national benefits under each element and option. Nor are those quantitative estimates provided for regional economic impacts of the alternatives considered in this analysis. Because those estimates cannot be provided, given the information available, the analysis does not identify an optimal allocation. To provide these data, information on the contribution to national welfare of all commercial removals would be needed. That information is currently unavailable for the commercial sector and an analysis to estimate those impacts is outside the scope of what can be completed as part of this document.

Determining which allocation would maximize net national benefits would require detailed information on costs and expenditures in both the commercial and charter sectors. In addition to cost information, demand for charter trips and angler willingness-to-pay for trips would also be required. Collecting that information would be expensive and time consuming. Even if these data were available, changes in the halibut biomass will impact the optimal sustainable yield and the optimal allocation of halibut. Because of these ongoing changes to the resource, any allocation that is optimal when it is made (if the Council felt an "optimal" allocation was appropriate, would be suboptimal in the future. Leasing IFQ from the commercial sector could aid in adjusting the allocation to one that benefits both the commercial and charter sector. The benefits of the leasing provision for the charter sector will depend on the availability of halibut for lease and the market price for that halibut. If halibut is available and clients are willing to incur a higher cost for a trip, the leasing of halibut would tend to benefit both sectors.

Charter Sector

The charter sector is comprised of business operators who are licensed by the State of Alaska to provide guided sport trips. It is not possible to provide estimates of the charter sector's net revenue. Additional information on both the revenues generated by the charter sector and the costs associated with providing those trips would be needed. There is not a complete set of data on the prices charged for a charter trip in Areas 2C and 3A. General information on trip prices is reported in the RIR, but reflect only a small sampling drawn from promotional advertising sources. Those samples are not intended to represent the mean trip price in a given area. Information is available from ADF&G saltwater logbooks on the number of trips taken in each area. In 2006, the charter business took over 92,000 and 138,000 clients fishing in Areas 2C and 3A respectively. While official figures are not available, average charter prices can range between \$150 and \$300 depending on the type and length of the trip. Using an average price of \$225 per client, the halibut allocation to the charter sector, and average harvest rates per client the analysis provides a rough estimate of gross revenues solely from trip fees of between \$7.4 million and \$17.8 million in Area 2C and \$26.3 and \$38.1 million in Area 3A. These numbers do not account for lodging revenues paid to charter lodge operators or other expenditures (e.g., plane tickets) made by charter clients. Consequently these numbers may not be considered an estimate of the economics value, direct or indirect, or the charter fleet. In addition, net revenues in the charter sector cannot be provided. Area-wide data are not available for either gross revenues or costs of operating the charter business. Both of these pieces of information are needed to estimate net revenues. The authority, cost, and time required to collect these data exceed those available for this action.

Criddle (2004, 2006) described four types of management combinations for a halibut fishery shared by a commercial and charter sector. One combination provided an example of when the commercial fishery was managed under an IFQ-based system and the charter sector was managed under a regulated open access sport fishery. Under the regulated open access system, it is assumed that the charter sector harvests are controlled by some combination of management measures. Criddle concluded that, when a sportfishing charter fleet is comprised of small homogeneous charter businesses (presumably, in the absence of significant excess capacity), an increase in demand for trips would result in an increase in trip prices, in the short-run. Long-run effects depend on the types of management measures used to constrain charter harvests. Size limits, bag limits, annual harvest limits, line limits, and prohibition on captain and crew harvests, if some of the fish went to the clients, could reduce the angler or operator surpluses generated from the trips. Seasonal closures, restrictions on where fishing is allowed, or limits on the

number of clients, are examples of management measures that could increase the costs of providing trips. It is anticipated that all rents in the charter fleet would be dissipated under the LEP if the capacity of the fleet does not limit competition for clients. If competition for clients is limited by the number of charter operators, then it is anticipated that the charter sector could generate some rents.

The Council considered adding (removing) management restrictions to (from) the charter sector when their harvest is 0, 5, or 10 percent above (below) their allocation. These benchmarks would provide a black and white definition of when management measures should be modified. However, the accuracy and timeliness of the charter harvest estimates and policy decisions/rulemaking could make modification of the management measures to conform with these benchmarks difficult.

If management measures restrict charter harvests to its allocation, increased demand for charter trips would be offset by more restrictive management measures. In this case, increases in demand for charter trips would not be expected to directly impact the commercial sector. The commercial sector would only be impacted if the charter sector were not constrained to its allocation, or if the growth in demand for charter services by the public results in the Council recommending, and the Secretary increasing that sector's allocation. It is also possible the commercial sector could petition the Council in the future to modify the charter allocation.

The Council is also considering allowing charter LEP holders to lease GAF from the commercial sector. We cannot predict the quantity of halibut that would be transferred, if leasing is allowed. However, both the charter operator and the commercial harvester must agree to the transfer for it to occur (i.e., the charter operator must pay a sufficient amount for the IFQs to compensate the commercial QS holder for forgone net revenues (Criddle 2006). Because the charter LEP holders do not benefit from consumer surplus, and commercial QS holders do not benefit from post-harvest surplus, they are not considered by the participants when determining whether to transfer IFQ.

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

Commercial Halibut Fishery

Impacts of moderate fluctuations in stock abundance would lead to changes in the commercial quota under either a fixed or a percentage based charter allocation. Changes in the amount of halibut harvested by the commercial sector could impact ex-vessel prices, commercial net revenue, and post harvest surplus. Given research conducted by Herrmann et al. (1999) on the price flexibility of Alaska halibut, the changes in ex-vessel price that results from increasing or decreasing the amount of commercial harvest in Areas 2C and 3A are expected to be very small as a result of this proposed amendment. An allocation to the charter sector that decreases the commercial allocation is expected to result in a small increase in ex-vessel price, but an overall decline in the net revenue of commercial harvesters. Post harvest surplus is directly related to the quantity of halibut on the market, so a decrease in commercial harvests would lead to a decrease in post harvest surplus (Criddle 2006). If the allocation to the charter sector is set at a level that reduces its harvest during periods when the combined commercial and charter catch limit is steady, the commercial harvest would be increased and post harvest surplus would increase.

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

Because commercial QS are expected to generate lower net revenues over the next six years (based on IPHC CEY projections), the asset value of Area 2C QS is also expected to decline. Persons that sell their

QS could expect to receive less for them. Shares would be acquired by "eligible" persons who believe stock abundance will increase over the longer-term. As a result, Area 2C QS holdings would be further concentrated. For these QS holders, constraints on charter harvest growth would help preserve their portion of the combined commercial and charter catch limit.

The Area 2C commercial allocation is projected to be smaller (during the years considered in this amendment) under the fixed poundage allocations, relative to the percentage based allocations. This is because the projected CEY is smaller during those years, relative to the base years used to determine the allocations.

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

Increased demand for charter trips does not affect participants in the commercial fishery when the charter sector is constrained (Criddle 2006). The proposed harvest limits are assumed to constrain the amount of halibut the charter sector can harvest to within 0, 5, or 10 percent of their allocation, so the commercial allocation would not be reduced to accommodate increased charter harvests. It is also important to note that unless there are stock conservation concerns, charter overages would have a minor impact on future combined commercial and charter catch limits.

The commercial sector, however, would be directly impacted¹⁶ by a charter allocation that is larger than the charter sector would harvest under the status quo. That scenario would allow the charter sector to increase its harvest, as client demand increases, until it reaches the allocation. From that point forward, the allocation would constrain the charter client harvests and the commercial sector would not be impacted by further increases in charter demand.

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

Leasing of GAF would allow commercial QS holders to transfer IFQ to the charter sector. The commercial sector is only expected to lease IFQ to the charter sector if they receive sufficient compensation to offset the net revenue they would expect to derive from harvesting the fish themselves. Because individual commercial harvesters generate different amounts of net revenue from its allocation, the commercial operations that generate the lowest marginal net revenue would be most likely to lease halibut, all else equal. Charter operations that have the highest net revenue per fish are expected to be the most willing buyers, if their net "benefit" per fish, is greater than or equal to the lease cost per fish. It is possible that an operator could "lose" money on a GAF, but would only knowingly do so in order to "benefit" in other than net revenue terms (e.g., "client good will", advertising "loss leader", etc.)

Charter Clients

Charter client trips would not be constrained by the amount of halibut available to its sector in-season under the status quo or the allocation options being considered. However, demand for charter trips could decline as more restrictive management measures are imposed (e.g., a one-fish bag limit in Area 2C) to

¹⁶ This assumes the charter and commercial sector share a combined commercial and charter catch limit as recommended by the IPHC staff.

keep the sector's harvest within its allocation, or supply of charter trips could be restricted in future seasons, as an off-set for overages in the past. Because excess capacity is expected to exist under the proposed charter LEP, at least in the short term, a charter client would be expected to pay a price for a trip that would allow the charter operator to earn normal profits (NPFMC 2006a).

Status quo regulations are expected to be more restrictive in Area 2C than in Area 3A. We have assumed the continuation of current regulations in both areas. However, a one-fish bag limit may be implemented in 2009 in Area 2C. Those management measures are expected to reduce both consumer demand and consumer surplus relative to regulations in place for Area 3A. Area 3A charter clients would remain under a 2-fish bag limit and a possession limit of 4-fish. The numbers of halibut that may be harvested by a client during the year are not further restricted. Because of the different management measures assumed to be in place for the two areas, clients may choose to take a trip in Area 3A, instead of Area 2C. This behavior would shift demand from Area 2C to Area 3A. If non-residents increase the percentage of trips they take in Area 3A, it may increase overall consumer surplus, relative to what it would be if participation patterns remained static.

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

We assume that the LEP would not be a constraint to persons booking a trip. Competition for clients is expected to keep trip prices at a level that would allow charter LEP holders to only earn normal profits. All else being equal, the price of trips should not increase as a result of the status quo management measures. Seasonal discounts may continue to be offered, especially in Area 3A, as charter LEP holders attempt to attract clients during the non-peak seasons. Discounted trips have historically been available before mid-June and after mid-August.

Halibut Processors

Halibut processors process both commercial and charter client's harvest. Processors may generate income from both sources or specialize in one or the other. Commercial halibut processors produce a variety of product forms and sell into a variety of markets. Representatives of the commercial sector have indicated that processors may receive about \$0.35 per pound for custom processing of halibut (frozen). They also indicated that halibut is important because it helps to keep product flowing through the plants when other fisheries are closed or deliveries are slow. Without a sufficient supply of halibut they may find it difficult to keep plants open as many days as they are currently.

Processors of sport-caught halibut provide a service to sport fishermen. They typically portion, package, and freeze halibut for a fee of \$1.00 to \$1.50 per pound, incoming weight. Halibut is also an important part of their income, especially in areas that have a large sportfishing presence.

Consumers of Commercial Halibut

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

Communities

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

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

Under the status quo, the contribution to personal income and employment attributable to the charter sector is expected to increase in Area 3A, in the long-run. In Area 2C, the sector would experience declines in the short-term, as a result of (anticipated) stricter management measures imposed to keep the sector within its GHL. If the CEY increases to higher levels in the future, the charter sector would be expected to increase of its contribution to personal income and employment, above the 2008 levels.

No options are being considered that limit the harvest of the charter sector within a fishing season, once the season's allocation is established. However, the management measures that are expected to be imposed on the Area 2C charter sector, possibly in 2009, would likely reduce client demand for trips (e.g., a one-fish bag limit). When the number of trips taken is reduced, the charter sector would need fewer input supplies (e.g., bait, fuel) and it would reduce expenditures within the communities that supply those inputs. When they purchase fewer goods and services within the community, it has a negative impact on that economy, if the reductions are not offset by increased purchases by other sectors (e.g., commercial halibut fishermen).

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

Self-guided anglers and subsistence harvesters

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

Imposing a limit on the amount of halibut that charter clients may harvest could result in some individuals that have access to a private boat fishing for halibut without a guide, when they would have used a guide service, all else being equal. Public comments for this action and prior Council actions pertaining to charter halibut fishing have included concerns about an increase in unguided or "bareboat" rentals. "Bareboat" rental companies provide vessels without crew, for the private uses of their clients. They do supply other equipment required for a successful fishing trip, such as maps, GPS locators, and fishing equipment. The public comments raised both safety and enforcement concerns about the effect of these businesses. The safety concerns focus on inexperienced boaters navigating in Alaska's challenging marine environment. Enforcement concerns have focused on the suggestion that some businesses would claim that a boat rental is unguided, but then provide a guide who would not identify himself as such, if intercepted by enforcement staff. Neither the NOAA Office of Law Enforcement or the USCG has expressed concerns to the Council about boater safety.

Current Regulatory Projects for Halibut Fisheries As of September 22, 2008

High priority projects in *Italics*; medium priority in **BOLD** ; lower priority in normal print
- as recommended by NMFS Staff -

Regulatory Project	What it does or would do if implemented	Status of Action
Commercial IFQ Fishery		
<i>Annual management measures and amendments to IPHC regulations</i>	Annual rulemaking to establish annual IPHC regulations	IPHC action in January 2009; publish final rule by March 2009
12/20 Rule	Action would establish new minimum vessel ownership criteria for using hired skipper of 12 months and 20% interest	Analysis from Council staff to Regional Economist required. Proposed rule package not yet started.
Omnibus V Action 3	Action would remove halibut and sablefish QS never used; Proposed lottery no longer applicable given amount of unused QS has fallen below 50,000 lb threshold.	Proposed rule package not yet started
Recreational Charter Vessel Fishery		
<i>Area 2C GHL management measures for 2009</i>	Limits charter vessel angler to: One-fish daily bag limit for entire season; Line limits of 6 per vessel; and No harvest by guide and crew	Analysis and proposed rule under development. Action intended to correct legal deficiency of 2008 rule. Anticipated schedule: PR: publish Nov. 2008 FR: publish Feb. 2009
<i>Limited entry (moratorium) for charter vessels in Areas 2C and 3A</i>	Would establish participation requirement of minimum 5 bottomfish trips during 2004 OR 2005 AND in year prior to implementation. A transferable permit would require min. 15 trips.	Proposed rule under Regional review. PR: publish late Nov. 2008 FR: publish April 2009 with subsequent application and appeals in 2009; fishing 2010.
<i>Area 3A GHL management measures</i>	Like the Area 2C action, this would be designed to maintain charter vessel harvest at the GHL	Development of rulemaking pending action by the Council at its October 2008 meeting; Final rule should be published May 1, 2009.
Catch sharing plan	Two-pronged approach would: (A) set fixed charter allocation in percent or pounds; (B) provide for charter vessel expansion above allocation through transfer of IFQ from commercial sector.	Council action expected October 2008. Pending Council action, anticipated schedule: PR: publish May 2009 FR: publish Nov 2009

Subsistence Fishery		
<i>Subsistence Omnibus III</i>	The action amends the subsistence fishery rules for Pacific halibut in waters in and off Alaska. These regulations are necessary to address subsistence halibut management concerns, particularly in densely populated areas.	PR published 4/14/2008 at 73 FR 2008. Comment period ended 5/14/2008. FR: Published September 24, 2008.
Kanatak Tribe relocation	Action would move the location of tribal HQ for Village of Kanatak from Egegik in Area 4E to Wasilla in Area 3A (change table at 300.65(g)(2)).	PR: published 8/4/2008; comment period ended 9/3/2008. FR: publish January 2009.
Rural resident definition	Action would define new areas outside of existing rural communities in which a resident would qualify for subsistence halibut fishing.	Council action in June 2008. PR: publish February 2009

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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

AGENDA C-1(a)
 Supplemental
 BRUC
 OCTOBER 2008

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September 19, 2008

RECEIVED
 SEP 23 2008
 N.P.F.M.C.

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

Dear Eric:

The recent release of catch estimates for the 2007 recreational halibut fishery off Alaska by the Alaska Department of Fish and Game (ADF&G) shows that the harvest was approximately 0.5 million pounds higher than initially projected:

Sector	Projected for 2007 (Mlb)	Actual (Mlb)	Difference (Mlb)	Difference (pct)
Charter	1.701	1.918	0.217	+12.7
Private	0.844	1.131	0.287	+34.0
Total	2.545	3.049	0.504	+19.8

While the charter sector catch was up slightly from the catch in 2006 (1.8 Mlb), we note that the average weight declined from 19.9 to 17.5 lbs, possibly as a consequence of the size restriction on the second fish in the 2-fish bag limit, which NMFS imposed beginning in July, 2007. We also find the jump in the private sector catch, from 0.723 in 2006 to 1.131 in 2007 to be of increased concern insofar as it indicates 'leakage' from the charter to the private sector, as the former comes under increased regulation.

These results have implications for 2008. In past years we have used projections provided by ADF&G for the upcoming year. For 2008, we deviated from that practice because of the Council's decision to manage to the GHL through the imposition of a 1-fish daily bag limit. Thus, the GHL amount (0.931 Mlb) was used as the projected charter sector harvest for 2008. While the 2008 catch is currently unknown, the daily bag limit in 2008 was the same as that for 2007, when 1.9 Mlb were caught. Consequently, we expect the following to be more indicative of 2008:

Sector	Projected for 2008 (Mlb)	Actual (Mlb)	Difference (Mlb)	Difference (pct)
Charter	0.931	1.918	0.987	+106
Private	0.844	1.131	0.287	+34
Total	1.775	3.049	1.274	+72

The court-mediated inability to implement the proposed 1-fish daily bag limit for 2008 will result in a charter fishery catch substantially higher than that projected by the IPHC when it approved catch limit regulations for 2008. These catch limit regulations incorporated an explicit recognition that the charter fishery catch would be controlled to the 0.931 Mlb specified in federal regulations. The regulations were accepted by the U.S. government and passed into federal law. The Commission relies on the ability of the U.S. government to enact compliance with accepted IPHC regulations, in order for the Commission to achieve its stock management goals.

The lack of compliance with GHJ targets will exacerbate the present conservation problem in Area 2C. Estimates of exploitable biomass for Area 2C have decreased markedly in recent years and the lack of adherence by the charter fishery to the targets established by the Council in turn frustrates the ability of IPHC to meet its management targets. The increased charter catch will delay the rebuilding of the Area 2C resource, and increase the harvest rate well above the 20 percent level we believe is appropriate.

In the short term, the inability to enact control measures for the charter fishery presents the Commission with considerable uncertainty about the regulatory actions that it needs to contemplate for 2009. It is important that the Commission have a clear understanding of the charter fishery management actions that will be implemented by the United States for 2009 when it develops its own catch limit regulations for the coming year. The impressive historical record of the Council in achieving its catch limit targets for commercial fisheries has been the critical element in successful management of north Pacific fisheries. The Commission is hopeful that the Council will be successful in extending this commitment into the management of halibut recreational fisheries.

Both Gregg Williams and I will be in attendance at the October meeting, and can answer any questions on this material.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Leaman". The signature is fluid and cursive, with a large loop at the end.

Bruce M. Leaman
Executive Director

cc: IPHC Commissioners

Limiting Area 3A Charter Halibut Harvests-Final Review of Proposed Management Options

Presentation to

North Pacific Fishery Management Council

Jonathan King

October 2008

northern economics

Proposed Management Options

- 1. One trip per vessel per day**
- 2. No retention by skipper or crew with line limits**
- 3. Annual catch limits**
 - 4/5/6 halibut
- 4. One fish bag limit**
 - May/June/July/August/September/Entire Season
- 5. Second fish of a minimum size**
 - Applies to 2nd fish at 45" or 50"
- 6. Second fish at or below a specific length.**
 - Applies to 2nd fish at 32"/34"/36"

Data and Methods

Data used for the current EA/RIR/IRFA were based on 2006 SWHS estimates. This presentation contains updated estimates based on final 2007 harvest numbers. We use the same analysis methods and data sources as prior analyses for Area 2C and the 2006/07 GHF analyses. The data for many of the options do not include the ability to create statistically valid upper and lower bound estimates. We have point estimates of effects for several options. As with the Area 2C analysis the magnitude of demand effects associated with specific options are generally unknown.

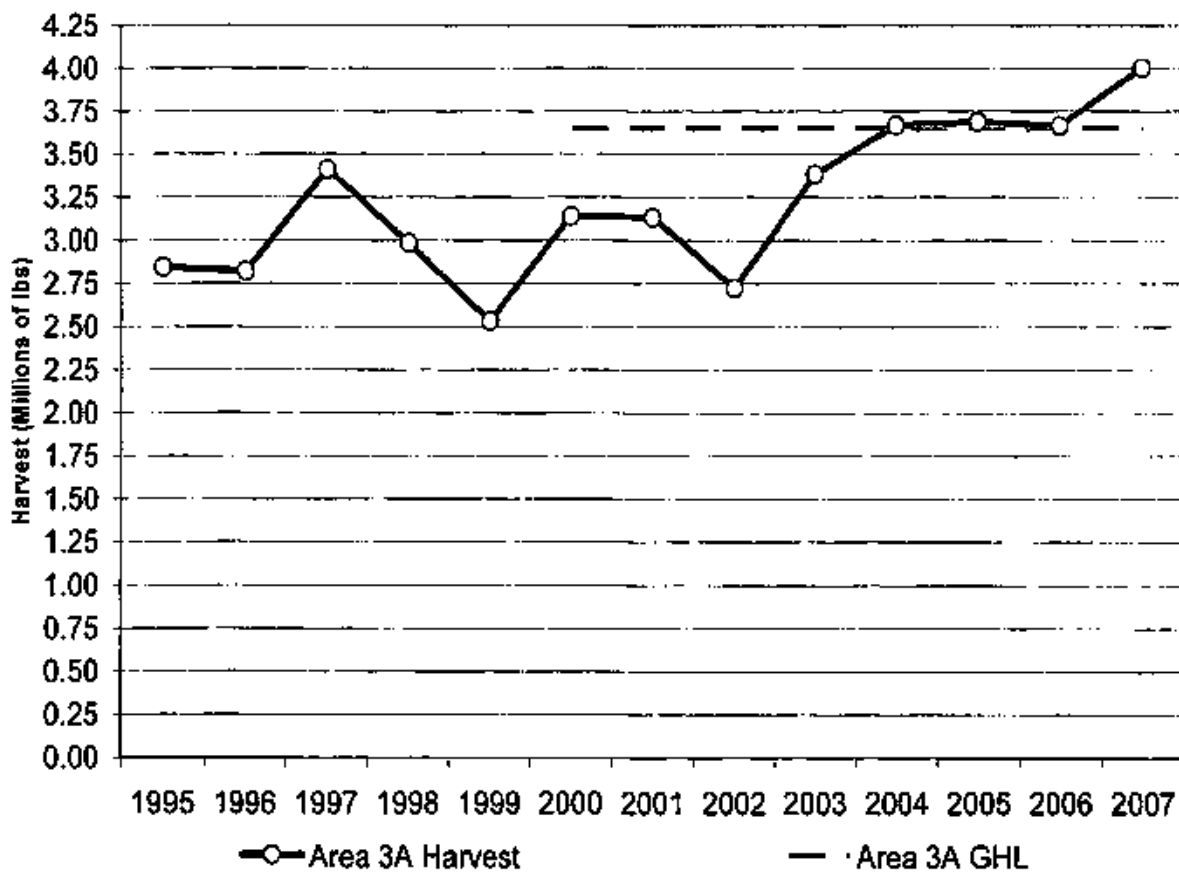
The Baseline and the Status Quo

Data indicate that charter halibut harvests in Area 3A in 2007 totaled 4,002 Mlb; equal to 109.6 percent of the Area GHF. Long-term growth rates in Area 3A are between 2.9 and 4.3 percent per year, but harvest grew 9 percent between 2006 and 2007.

In January 2007, ADF&G issued an emergency order banning retention of sport caught fish by skipper and crew during saltwater charters. We included this EO as part of the status quo for the written analysis.

In order to be consistent, the options were analyzed in accordance with the status quo, which has the same net effect as Option 2 (i.e. a federal ban on skipper and crew harvest).

This method means that the results for each Option are presented as if in conjunction with Option 2.



Option 1- One Trip per Vessel per Day

- Restricts vessels to one trip per day where halibut is retained. "Second Trips" are a growing portion of the Area 3A harvest.
- Estimated effect is between 287,000 lbs and 318,000 lbs under 2007 conditions or between 7.2 and 8.0% of the harvest.
- As a stand alone measure the option would reduce harvest to between 100.9% and 100.8% of the GHL.
- Actual savings will likely be less than anticipated given the latent capacity in the industry.
- "Second Trip" vessels are concentrated in Cook Inlet.

Estimate Level	Estimated Effect in Conjunction with Option 2			
	Harvest Reduction (Mlbs)	Harvest Reduction (%)	Estimated Post-Action Harvest (Mlb)	As a Portion of the 3.650 Mlbs GHL (%)
Lower	0.287	7.2%	3.715	101.8%
Upper	0.318	8.0%	3.684	100.9%

Option 2- No Retention by Skipper & Crew with Line Limits

- Bans the retention of halibut by skipper and crew while on charter trips.
- In 2006 the logbook data indicated that skipper and crew harvested 10.4 percent of the halibut harvested from charter vessels. ADF&G's 2007 EO likely saved 460,000 pounds from being harvested during charter trips.
- There is no additional harvest savings associated with moving from a State EO to a Federal ban on skipper and crew harvest.

Estimate Level	Estimated Effect			
	Additional Harvest Reduction (Mlbs)	Harvest Reduction (%)	Post-Management Harvest (Mlb)	As a Portion of the 3,650 Mlbs GHLL (%)
Point Estimate	0,000	0.0%	4,002	109.6%

Option 3- Annual Catch Limits

- Three sub-options limiting anglers to 4, 5, or 6 fish annually.
- These sub-options would reduce harvest by approximately 307,000 pounds (7.7 percent of '07 harvest), 203,000 pounds (5.1 percent of '07 harvest), and 114,000 pounds (2.8 percent of the '07 harvest) respectively as stand alone measures.
- Estimated effects are lower than in past analyses because of the status quo. Skipper and crew are the predominant "super multi-fish" harvesters in Area 3A.

Estimate Level	Estimated Effect In Conjunction with Option 2			
	Harvest Reduction (Mlbs)	Harvest Reduction (%)	Post-Management Harvest (Mlb)	As a Portion of the 3,650 Mlbs GHLL (%)
Four Fish	0.307	7.7%	3,695	101.2%
Five Fish	0.203	5.1%	3,799	104.1%
Six Fish	0.114	2.8%	3,888	105.5%

Option 4- One Fish Bag Limit

- Institutes a one fish per day limit in May, June, July, August, September, or for the entire season.

Sub-Option	Estimate Level	Estimated Effect In Conjunction with Option 2			
		Harvest Reduction (Mlbs)	Harvest Reduction (%)	Post-Management Harvest (Mlb)	As a Portion of the 3,650 Mlbs GHL (%)
May	No Demand	0.160	4.0%	3,842	105.3%
	30% Demand	0.214	5.3%	3,788	103.8%
June	No Demand	0.480	12.0%	3,522	96.5%
	30% Demand	0.638	15.9%	3,364	92.2%
July	No Demand	0.725	18.1%	3,277	89.8%
	30% Demand	0.961	24.0%	3,041	83.3%
August	No Demand	0.460	11.5%	3,542	97.0%
	30% Demand	0.614	15.3%	3,388	92.6%
September	No Demand	0.072	1.8%	3,930	107.7%
	30% Demand	0.097	2.4%	3,905	107.0%
Entire Season	No Demand	1,904	47.6%	2,098	57.5%
	30% Demand	2,533	63.3%	1,469	40.2%

Option 5- Two Fish Bag Limit; Second Fish Above a Minimum Size

- The measure establishes a minimum size limit for second fish of 45 inches or 50 inches. By themselves the sub-options reduce harvest by:
 - 1.381 Mlb-1.643 Mlb for the 45" limit to between 64.6-71.8% of the GHL.
 - 1.526 Mlb-1.774 Mlb for the 50" limit to between 61.0-67.8% of the GHL.
- We note that this option could result in a de facto one fish bag limit in some areas. Consequently, some form of aggregate demand reduction or a geographical transfer in demand might be expected.

Sub-Option	Demand Reduction	Estimated Effect In Conjunction with Option 2			
		Harvest Reduction (Mlbs)	Harvest Reduction (%)	Post-Management Harvest (Mlb)	As a Portion of the 3,650 Mlbs GHL (%)
45	No Reduction	1.381	34.5%	2,621	71.8%
	10% Demand Reduction	1.643	41.1%	2,359	64.6%
50	No Reduction	1.526	38.1%	2,476	67.8%
	10% Demand Reduction	1.774	44.3%	2,228	61.0%

Option 6- Two Fish Bag Limit; One Fish ≤32" or 34" or 36"

The 32" size limit as a stand alone measure would reduce harvest by 0.661 and 0.929 Mlb and to between 84.2% and 91.5% of the GHL.

The 34" size limit as a stand alone measure would reduce harvest by 0.532 and 0.789 Mlb to between 88.0% and 95.1% of the GHL.

The 36" size limit as a stand alone measure would reduce harvest by 0.402 and 0.680 Mlb to 18.4% to between 91.0% and 98.6% of the GHL.

Sub-Option	Estimate Level	Estimated Effect In Conjunction with Option 2			
		Harvest Reduction (Mlbs)	Harvest Reduction (%)	Post-Management Harvest (Mlb)	As a Portion of the 3,650 Mlbs GHL (%)
32"	Highgrading to Next Size Class	0.661	18.1%	3.341	91.5%
	If Anglers Catch Average Fish Below Limit	0.929	25.4%	3.073	84.2%
34"	Highgrading to Next Size Class	0.532	14.6%	3.470	95.1%
	If Anglers Catch Average Fish Below Limit	0.789	21.6%	3.213	88.0%
36"	Highgrading to Next Size Class	0.402	11.0%	3.600	98.6%
	If Anglers Catch Average Fish Below Limit	0.680	18.6%	3.322	91.0%

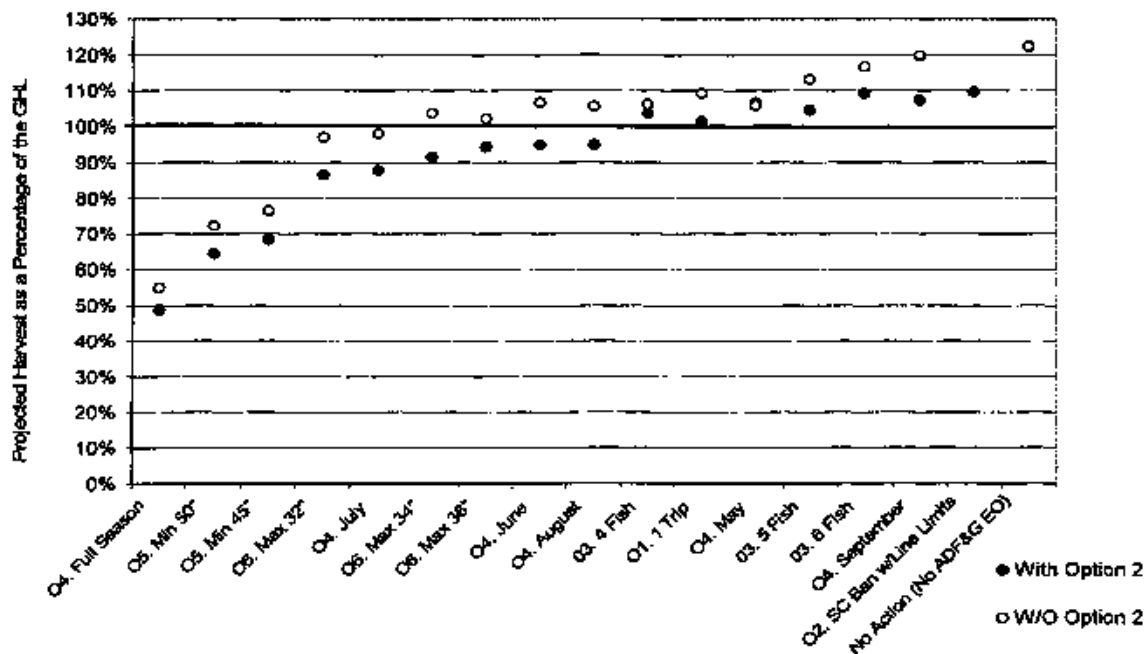
Summary-Measures In Conjunction with Option 2/Status Quo

GHL Group	Management Option (Each Option Assumes the Inclusion of Option 2)	Sub-Option	Estimated 2007 Harvest with Option (Mlb)		Post-Option Harvest as a Portion of the GHL (%)	
			Less Effective	More Effective	Less Effective	More Effective
Below the GHL	Option 4. One Fish Bag Limit	Full Season	2.098	1.459	57.5%	40.2%
	Option 5. Minimum Size on the Second Fish	50"	2.476	2.228	67.8%	61.0%
	Option 5. Minimum Size on the Second Fish	45"	2.621	2.359	71.8%	64.6%
	Option 4. One Fish Bag Limit	July	3.277	3.041	89.8%	83.3%
	Option 6. Maximum Size on the Second Fish	32"	3.341	3.073	91.5%	84.2%
	Option 6. Maximum Size on the Second Fish	34"	3.470	3.213	95.1%	88.0%
	Option 4. One Fish Bag Limit	June	3.522	3.364	98.5%	92.2%
	Option 4. One Fish Bag Limit	August	3.542	3.388	97.0%	92.6%
	Option 6. Maximum Size on the Second Fish	36"	3.600	3.322	98.6%	91.0%
Around the GHL	Option 3. Annual Limit	4 Fish	3.685	3.685	101.2%	101.2%
	Option 1. One Trip per Day	None	3.715	3.684	101.8%	100.9%
Above The GHL	Option 3. Annual Limit	5 Fish	3.799	3.799	104.1%	104.1%
	Option 4. One Fish Bag Limit	May	3.842	3.788	105.3%	103.8%
	Option 3. Annual Limit	6 Fish	3.888	3.888	106.5%	106.5%
	Option 4. One Fish Bag Limit	September	3.930	3.905	107.7%	107.0%
	Option 2. No Harvest by Skipper & Crew (Status Quo)	None	4.002	4.002	109.6%	109.6%

Summary-No Combination with Option 2

	Management Option (Each Option WITHOUT the Inclusion of Option 2)	Sub-Option	Harvest with Option (Mlb)		Post-Option Harvest as a Portion of the GHL (%)	
			Less Effective	More Effective	Less Effective	More Effective
Below the GHL	Option 4. One Fish Bag Limit	Full Season	2,319	1,890	63.5%	46.3%
	Option 5. Minimum Size on the Second Fish	50"	2,763	2,515	75.7%	68.9%
	Option 5. Minimum Size on the Second Fish	45"	2,925	2,663	80.1%	73.0%
Near the GHL	Option 4. One Fish Bag Limit	July	3,658	3,422	100.2%	93.8%
	Option 6. Maximum Size on the Second Fish	32"	3,728	3,430	102.1%	94.0%
	Option 3. Annual Limit	4 Fish	3,784	3,784	103.7%	103.7%
Above the GHL	Option 6. Maximum Size on the Second Fish	34"	3,873	3,588	106.1%	98.2%
	Option 3. Annual Limit	5 Fish	3,893	3,893	106.6%	106.6%
	Option 4. One Fish Bag Limit	June	3,931	3,773	107.7%	103.4%
	Option 4. One Fish Bag Limit	August	3,952	3,799	108.3%	104.1%
	Option 3. Annual Limit	6 Fish	3,987	3,987	108.2%	109.2%
	No Action (ADF&G Continues to Issue Emergency Orders) or Option 2	None	4,002	4,002	109.6%	109.6%
	No Action (ADF&G Does Not Continue to Issue Emergency Orders)	None	4,467	4,467	122.4%	122.4%
	Option 6. Maximum Size on the Second Fish	36"	4,017	3,707	110.1%	101.6%
	Option 1. One Trip per Day	None	4,146	4,111	113.8%	112.6%
	Option 4. One Fish Bag Limit	May	4,288	4,234	117.5%	116.0%
Option 4. One Fish Bag Limit	September	4,386	4,361	120.2%	119.5%	

Figure: Shift Caused by Not Including Option 2



**comSection 2.2.2.6.1 Charter Halibut Catch Sharing
Implementation Plan for Area 2C and Area 3A**

**Regulatory Amendment for a Catch Sharing Plan
for the Pacific Halibut Charter and Commercial Longline
Sectors in International Pacific Halibut Commission
Regulatory Area 2C and Area 3A**

**Environmental Assessment/Regulatory Impact Review/
Initial Regulatory Flexibility Analysis**

Date: September 25, 2008

2.2.3 Catch Sharing Implementation Plan

2.2.3.1 Introduction

The Charter Halibut Area 2C and Area 3A Catch Sharing Implementation Plan (Implementation Plan) is a cooperative effort between the State of Alaska (State) and National Marine Fisheries Service (NMFS) to define the infrastructure necessary to manage halibut catch sharing between the commercial and charter halibut fleets operating in these areas.

Several interagency work groups met through the spring and reviewed the North Pacific Fishery Management Council's (Council) request for a catch sharing implementation plan and the Council's April 2008 motion for a catch sharing plan. The groups recommended a program to manage guided angler fish (GAF) that could be implemented in the short term. Discussions also considered longer term initiatives for improved monitoring for catch sharing. These initiatives are examined as potential guidance for planning future programs.

The implementation plan briefly reviews status quo accounting of all charter harvests of halibut, explains accounting of existing commercial individual fishery quota (IFQ), then examines accounting of transfers of IFQ pounds from the commercial IFQ holder to the licensed charter vessel operator for lease and return transfer of unused guided angler fish (GAF) to the IFQ holder. The plan adapts existing agency programs in the short term to provide accurate and timely record keeping, enforcement, reporting, and outreach for GAF harvest by the charter fleet. Costs of implementing short term plan requirements and recommendations are reviewed and plan deficiencies are noted for completeness.

The Implementation Plan anticipates further work will be necessary to meet priorities for halibut catch sharing in the long term. Implementation of the Council's catch sharing plan for halibut in Area 2C and 3A should provide the regulatory and procedural foundation for operation of plan programs specified by selected elements of the preferred alternative. Plan implementation can also trigger options for new initiatives as management and industry respond to catch sharing in action. The plan outlines new longer term initiatives to consider the utility of real time collection of common pool data in addition to GAF harvest data to improve the accuracy of the charter fishery data and to reduce the duration of the feed back loop.

2.2.3.2 Scope

The scope of this Implementation Plan is limited to expanded data collection and reporting in the short term to allow lease of GAF and anticipates longer term initiatives for continued improvement of a catch sharing program. The approach of the implementation plan in the short term is to develop a GAF program. The program allows charter operators to increase their harvest and the amount of halibut available to their anglers by leasing IFQ from a commercial quota holder. The program is planned to account GAF in real time and adapts the existing IFQ program to account for lease transactions between the charter and commercial sectors throughout most of the year. The program includes criteria for transfer and use of GAF and new data collection and reporting requirements for real time accounting and management of GAF transfers.

The Implementation Plan briefly outlines longer term initiatives that would benefit from the experience, perspective, and knowledge that policy makers, managers and fishery stakeholders bring to the table now. Addressing longer term initiatives would leverage the cumulative Council guidance on objectives to address current issues and unknowns. Policy decisions on collection of new information, information collection responsibilities, and annual cycles for management would extend the planning horizon beyond implementing the GAF program.

2.2.3.3 Limitations

The extent of work discussed in this plan is not complete, in part, because the current plan content could change if the Council revises its objectives for a preferred alternative and in part, because the alternatives and suite of elements and options the Council could approve is unknown. Defining actions to implement the complete suite of proposed elements and options and all logical combinations was considered beyond the scope of this Implementation Plan since many of the elements would require assumptions about policy decisions. Instead the work groups narrowed the focus of this plan to definitive concrete tasks for new GAF monitoring and record keep record requirements. Requirements were designed to allow industry flexibility in meeting the minimum of restrictions necessary for accurate and timely management of GAF.

The proposed catch sharing plan under Alternative 2 contains six elements for Council consideration. Council action on Elements 1 and 5 would initiate rulemaking for new Federal regulations to allocate halibut to the charter sector and allow the charter sector to lease halibut from the commercial sector. Elements 2, 3, 4, and 6 involve Council policy and intent and could result in rulemaking to manage the charter halibut harvests according to an Element's objectives. This Implementation Plan assumes that regulations would be developed by NMFS to implement the Council's proposed action. However, the plan does not attempt to define the possible suite of regulations that could evolve from the Council's final selection of elements and objectives that form the catch sharing plan for Areas 2C and 3A.

The plan does not discuss details of initial and potentially annual changes to existing data collections, database systems and programs that could result from all the elements in Alternative 2. Specifically, the plan does not detail changes to the logbook, Statewide Harvest Survey (SWHS), or in season catch sampling programs that could result from implementing a catch sharing program. All of the elements except element 1 for an allocation could directly change the amount and timing of data collected, data reporting and outreach; the distribution of sampling and enforcement effort; and duration of the feedback loops. Element 1, allocation, does not directly impact the agency systems for processing fishery data or implementing a catch sharing plan. Alternative 2, Elements 2, 3, 4 and 6, could each alter these programs initially and annually depending on the Council's decisions on the catch sharing plan elements and annual revisions for

management of the halibut fishery. Element 2, the annual regulatory cycle, could invoke analysis to reconcile charter harvest with future management measures and could impact the information collected from the charter fleet from year to year. Element 3, the annual management measures, can result in changes to a program, a system, and the methods used to collect and report data and enforce requirements. Element 4, the timeline element for a three or four year feedback loop could change the frequency of analysis and reporting of data and therefore the amount of effort necessary to collect and process data. Element 5, could implement a new program for accounting GAF that is described in detail in this implementation plan. However, future changes to GAF reporting as a result of interactions with other elements are not covered. Element 6 could introduce several new initiatives to existing data collection and reporting programs that may overlap with recommended revisions for a GAF program.

2.2.3.4 Management Approach

The management approach directly influences the degree of success the implementation plan will have in fulfilling the Council's purpose and objectives for halibut catch sharing. A simple management strategy with straight forward implementation tasks is more easily understood and easier to comply with than a complex management strategy with numerous requirements and greater risk for misinterpretation of regulations.

In establishing a catch sharing plan for the commercial and charter halibut sectors, the Council may set an initial allocation of halibut to the commercial and charter fleets under Element 1. Such action would not result in new monitoring or reporting of charter catch during the charter halibut fishing season because the Council has clearly recognized that the proposed allocations do not equate to a hard cap. An allocation would replace the current guideline harvest level (GHL) with a catch limit but as with the GHL, the harvest of halibut by the charter fleet could exceed the specified level and the fishery would continue. The Council intent is to provide advance notice of management measures that will be used to achieve the charter allocation and a predictable season length. As proposed, the measures and season length would be established during the year prior to the year when they take effect and not be changed in season.

2.2.3.5 Purpose and Objectives

The purpose of this Implementation Plan is to describe a reporting system to accurately capture information about charter halibut harvests in IPHC regulatory Areas 2C and 3A, including transfers of leased halibut, to facilitate the timely implementation of management measures. These actions set the stage to stabilize harvests, and improve the accuracy and predictability of annual harvest levels for the benefit of all stakeholders and the halibut fishery. The objectives of the implementation plan are to identify approaches for timely, accurate and precise data to determine the appropriate regulations for stable and predictable execution of the halibut fisheries.

The short term objectives of this plan are to:

- Accurately account for the harvest of leased halibut in real time;
- Maintain timely record of lease transactions;
- Make compliance and accurate reporting of GAF as easy and convenient as possible;
- Get GAF program information to the fishery managers and fishing public in a readily understood manner;
- Provide catch accounting features that minimize incidence of improper reporting caused by confusion over requirements; and
- Make enforcement efforts more efficient and effective.

Longer term objectives include:

- Improve accounting of all harvests by the charter fleet; and
- Reduce the time for management feedback on all charter harvests.

2.2.3.6 Status Quo Accounting of Charter Halibut Harvests

The implementation plan assumes status quo monitoring of all halibut harvested on a charter vessel would continue using the ADF&G Saltwater Charter Vessel Logbook (logbook), mail out Statewide Harvest Survey (SWHS), and inseason catch sampling program. Common pool and GAF harvests would be accounted for using these existing tools and each will require minor revision to accommodate notation of a GAF separate from a common pool fish. The management of GAF will also require real time reporting, specifically daily verifiable reporting. Discussion of the accounting features of the GAF program follows in sections below.

2.2.3.6.1 Logbooks

As needed, ADF&G has accommodated changes to the logbook that NMFS has found necessary for enforcement and management. NMFS requests for changes to the logbook have had minimal impact on the logbook development, printing and distribution costs. However, two design changes to the logbooks have impacted costs. First, adding data fields costs additional staff time for industry outreach and education including: instruct users on accurate reporting; educate users on new logbook requirements; and follow up on illegible or missing data. Second, adding fields to a data form for new data collection uses more space on a form. This has resulted in operators using more forms within a season. Of the two factors impacting the logbook project, increased staff time to respond to logbook entries is much more costly. Adding information to the logbook increases costs \$55,000 annually: \$48,000 for staffing and 7,000 for form booklets. The time to redesign the logbook, consult with agency data users, and update documentation and instructions would be absorbed by impacted State and Federal agencies.

Currently, the logbook is returned to the State weekly and typically the data entered into a database within one to two weeks. This rapid turn around allows preliminary estimation of charter harvests but the data are recorded in the logbook by the charter operator and therefore are not validated. The SWHS provides another estimate of charter harvest based on recall by the angler and is used to verify the logbook data. A multiyear comparative analysis of the two data collections is in its second year.

2.2.3.6.2 Statewide Harvest Survey

The SWHS will also require an update to accommodate GAF harvests, but time and cost estimates depend on the extent of work entailed in the alternative, elements and options selected by the Council. If the Council's chosen management approach retains the two year lag between the time the SWHS data is collected and reported, then the current data collection program is sufficient according to the Council and SSC review of a statistical comparison of the 2006 logbook and SWHS data in April 2008. At that meeting, the Council recommended gathering additional year's data to include in the analysis comparing the SWHS and logbook data collection methods. The Department of Fish and Game plans to repeat the analysis again for presentation in 2009.

2.2.3.6.3 In Season Sampling

Charter halibut harvests are sampled by ADF&G at the major points of landing in Areas 2C and 3A. The objectives of halibut sampling are to estimate the average weight, length composition, and spatial distribution of ground fish effort and halibut harvest. Data are collected through creel surveys in Southeast Alaska and port sampling in Southcentral Alaska. The programs in each region differ with respect to design and the species covered by the objectives. The Southeast creel surveys also estimate salmon effort, harvest, and catch rates, hatchery contribution, age

composition of the Chinook harvest, the mean weight of harvested rockfish and lingcod, etc. The creel surveys have historically been designed to optimize collection of salmon information but have been adapted to collect information from halibut and groundfish. The Southcentral port sampling program was designed primarily to estimate the characteristics of harvested halibut and groundfish, and includes estimation of age, size, and sex composition of rockfishes, lingcod, and sharks. Sampling of halibut is a major part of both programs. Mean weight is estimated from length data collected at each major port, using the IPHC length-weight relationship. Sample size goals are set for each port to achieve desired levels of precision. Technicians in both programs are instructed to sample halibut off a vessel only if all of the retained fish (or their carcasses) are available to be measured, i.e., have not been butchered and thrown overboard. Programs in both regions collect vessel-trip level interviews to monitor the proportions of halibut harvest that is cleaned at sea, and the Southcentral region program uses this information to stratify estimates for Lower Cook Inlet. Interviews in both regions also collect information on the target species categories, statistical areas fished, and proportions of fish caught that were retained versus released. Data on hook type use was collected in both regions in 2007 to estimate halibut discard mortality.

2.2.3.7 Catch Sharing

Halibut catch sharing would be initiated through privately arranged leases that authorize Federal transfer of halibut from a commercial individual fishery quota (IFQ) holder to a licensed charter vessel operator. The lease would document legal arrangements between parties but would be separate from the Implementation Plan. If the proposed charter vessel limited entry program is approved by the Secretary of Commerce, then the lease authorizing transfer of IFQ would be to a charter halibut permit holder. This draft Implementation Plan does not assume the limited entry program would be effective at the time a GAF program could be implemented. Instead, the plan assumes that an individual applying to lease commercial IFQ for use as GAF be required to be a State licensed charter halibut operator. In addition any transfer of halibut between the commercial and charter sectors would have to be approved by NMFS before it would be effective.

2.2.3.8 IFQ and GAF Account Structures

2.2.3.8.1 IFQ

A commercial IFQ permit is created annually for each Quota Share (QS) holder and each person who receives IFQ by transfer. If a person holds IFQ in the same category but for different IPHC areas, an account for each area is established under that same IFQ permit number. Commercial halibut IFQ accounts are automatically established, after the IPHC sets the commercial halibut harvest levels by management area for the year. These harvest levels are treated as total allowable catches (TACs) for IFQ fisheries in waters in and off Alaska. Annual IFQ accounts are populated with pounds based on the QS holder's fraction of the "quota share pool" (QSP, the sum of all QS units issued) for an IPHC area. Alternatively, an IFQ permit and annual IFQ account is created for a person who holds no QS but receives IFQ by transfer. The Restricted Access Management (RAM) program in NMFS typically issues IFQ in early February. Annual IFQ expires at the end of each fishing year.

Once the commercial halibut TACs are established, RAM calculates the amount of IFQ issued to an IFQ permit holder's accounts. For each IPHC area in which a person holds QS, the amount of QS held is divided by the quota share pool (QSP). The resulting fraction is then multiplied by the TAC for that IPHC area. The equation yields the unadjusted number of pounds of IFQ that a permit holder may harvest from the area during the fishing year:

$$QS \div QSP \times TAC = IFQ$$

At the start of the year the annual allocation of IFQ to an account may be adjusted slightly (up or down), depending on the prior year's fishing activities of the person who fished the IFQ, and will be revised as necessary for subsequent in season QS/IFQ transfers.

2.2.3.8.2 GAF

Commercial IFQ is available for transfer immediately after issuance. In a process similar to that for commercial permits and accounts, an annual GAF permit would be issued and GAF account created when NMFS approves the first annual lease of commercial IFQ to a licensed charter vessel operator. An annual GAF account would contain no GAF until the GAF permit holder received his/her first transfer of commercial IFQ each year.

Each licensed charter vessel operator would receive a separate GAF permit for each commercial IFQ "leaser" from whom he receives GAF. This GAF account structure is necessary to facilitate in season "returns" of GAF to the appropriate commercial leaser and to prevent overly complicating already very complex commercial adjustments for the following year.

2.2.3.8.3 Conversion between Weight and Number for GAF Accounting

A factor to convert between commercial halibut IFQ pounds and GAF halibut would be established each year for IPHC Area 2C and Area 3A separately by ADF&G Sport Fish Division. These annual, area specific factors represent the average weight of all charter halibut harvested in each area. Using all charter halibut measurements to estimate the factor makes two assumptions. The first assumption is the size of halibut measured by the ADF&G in season sampling program are representative of all fish harvested by charter anglers and there is no difference in size of a common pool fish and GAF. Second, a single factor assumes no difference in the size distribution of halibut harvested by the commercial and charter fleet in an IPHC area.

The first year of a GAF program would require the conversion factors to be estimated using the prior year's preliminary estimate of annual average length of halibut in each of the Areas 2C and 3A. The average length value would then be assigned an average weight according to the IPHC length/weight chart. The resulting average weight value would apply to all transfers of IFQ and GAF between the commercial and charter sectors during the year and would be publicized to facilitate IFQ and GAF transfers. The conversion factors and average weight for Areas 2C and 3A would be publicly available in the fall to facilitate IFQ and GAF transfers for the following fishing year. The commercial and charter sectors would be notified through the NMFS web site, in the *Federal Register*, or through direct mailing.

2.2.3.8.3.1 Estimation of Average Weight

The estimate of average weight is important for conversion between weight and number of GAF halibut. The SSC noted in April 2008 that if GAF are accounted for in numbers by the charter sector, there may be an incentive to selectively harvest fish that weigh more than the average weight assumed when IFQ pounds are converted into GAF numbers. This is especially pertinent when full retention is not required but a bag limit is in effect or the size of one retained maximum size limit is placed on one fish in the bag limit (as in Area 2C during 2007 and 2008). Assuming an angler and operator prefer to maximize the size of fish retained per charter expenditure, a GAF provides an opportunity to upgrade to a larger fish. When this behavior is the norm for an area, then harvest of GAF converted to pounds could be underestimated. As noted elsewhere in the EA/RIR/IRFA, errors in estimation of GAF removals may result if no data are available from an area and inappropriate average weights are substituted. Accurate accounting of GAF removals will require adequate and representative sampling of GAF harvest.

Average weights are currently estimated from halibut length measurements obtained from the charter halibut harvest by ADF&G. Estimates of average weight for each subarea (e.g., Ketchikan, Sitka, Lower Cook Inlet, Western PWS, etc.) are weighted by the proportion of harvest in each subarea to estimate the average weight by IPHC regulatory area. Preliminary estimates of harvest are compiled in the fall of each year using projections of past harvests (in numbers of fish) and preliminary average weight data. Final estimates of average weight are available in the fall of the following year and can be quite different from the preliminary estimates due to some raw data errors, but principally because harvests are distributed among the ports differently than in the projections.

The Council considered potential issues with conversion between pounds and number of fish in Option 3 of Element 6 for a catch accounting system. The Council stated its intent for a GAF catch accounting system to collect length measurements of GAF for two purposes. First is to compare annual average length of GAF to the average length of all charter halibut harvests to insure pounds removed as GAF are accurately accounted. The second purpose is to use GAF length measurements in the formulation of average weights used in the conversion of IFQ pounds to GAF.

The workgroups debated how to require measurement of GAF and enforce GAF measurements and decided identifying GAF fish for measurement by trained samplers was the simplest approach and least burdensome to the charter fleet. ADF&G record keeping and reporting requirements would need to be revised to identify GAF fish. The ADF&G logbook and in season sampling forms would be revised by adding a column to identify the number of GAF and common pool fish harvested by an angler and kept for offload at a point of landing. The method used to identify a GAF fish from all other fish onboard a charter vessel is left to the discretion of the licensed charter vessel operator. Measuring the length of GAF fish and entering the length of each GAF fish in the logbook would not be required.

Recording the number of GAF fish an angler harvests in the logbook would be sufficient for enforcement of charter halibut bag limits and to account GAF harvests for real time reporting requirements. Distinction of GAF fish from other sampled fish will allow in season samplers to measure GAF lengths, and record and report the length of GAF fish along with common pool halibut and all other retained charter fish.

As noted, the first year a GAF program is implemented, area-specific conversion factors would be based on average length (converted to average weight) of all sampled charter halibut because data would not yet be collected to differentiate between common pool and GAF charter halibut. If at a future date, ADF&G in season sampling of GAF can be used to determine that GAF differ statistically in length (and weight) from common pool charter halibut, then an independent conversion factor based solely on sampled GAF may need to be established. Future evaluation of halibut size data would be presented to the Council's Science and Statistical Committee for review prior to use. Further evaluation of the utility of estimating area specific conversion factors from the current in season sampling program could be the subject of a longer term initiative.

2.2.3.8.4 Conversion from IFQ pounds to GAF

An application to transfer IFQ pounds to GAF would specify the pounds of halibut IFQ to be transferred to a GAF account, and NMFS would convert the IFQ pounds into the largest number of whole GAF possible. The IFQ account would be debited only for the number of whole pounds actually required to make up that number of GAF. Transactions for lease and reversion of GAF would be made in whole pounds and whole fish. For example, if the 2009 ADF&G average

weight for charter halibut in Area 2C is 20 pounds and a licensed charter vessel operator leases 1,000 pounds from an IFQ permit holder, then NMFS would create a 2C GAF account for the charter permit holder with a balance of 50 fish:

$$1,000 \text{ lbs IFQ} \div 20 \text{ lbs/fish} = 50 \text{ GAF}$$

In this case the conversion resulted in a whole number of GAF fish with no remainder of IFQ pounds, so the entire IFQ amount requested for lease was transferred. Fractions of fish required to make whole GAF would be rounded to the nearest whole pound for IFQ account debit. IFQ pounds requested to be leased but which could not be used to constitute a whole GAF would not be transferred. For example, if the average weight for charter halibut in an area is 22.57 pounds and a lease of 1000 pounds of IFQ halibut is requested, then a total of 44 whole GAF would be credited to the GAF account and the remaining 7 pounds would remain on the IFQ account and not be converted.

$$1,000 \text{ lbs IFQ} \div 22.57 \text{ lbs/fish} = 44.31 \text{ GAF or } 44 \text{ GAF; and}$$

$$1,000 - (44 \text{ fish} \times 22.57 \text{ lbs/fish}) = 6.92 \text{ remaining lbs, rounded to } 7 \text{ IFQ lbs.}$$

2.2.3.8.5 Conversion from GAF to IFQ pounds

An application to transfer leased GAF back to an IFQ account would need to be approved by NMFS and the transaction completed before October 1. At that time all remaining GAF in GAF accounts would automatically revert back to IFQ pounds in the originating leaser's IFQ account and the GAF account would expire. A transfer application would specify the number of GAF to be transferred to an IFQ account. In either case, NMFS would convert GAF to the maximum number of whole IFQ pounds possible. The GAF account would be debited only for the number of whole fish transferred to IFQ pounds. The number of IFQ pounds added back to the IFQ transferor's account would be rounded to the next lower whole number of pounds resulting from "returned" fish. Following the convention of rounding to the nearest whole number would falsely inflate the number of pounds beyond the amount originally transferred when rounding up, therefore when converting GAF back to IFQ pounds, decimal pounds would always be rounded down.

After all remaining GAF transfer back to a commercial IFQ account, a GAF account balance would be zero unless additional transfers of IFQ were requested. After NMFS converts all GAF remaining in a GAF account back to commercial IFQ on or after October 1, the GAF balance would be zero through the end of the year. GAF accounts would not be subject to future-year adjustments. Adjustments due to GAF use could only apply to commercial IFQ accounts subject to underage provisions applicable to the underlying commercial QS.

For example, if the licensed charter vessel operator harvested 40 of the 50 fish leased, then 10 fish remain that can be transferred back to the IFQ permit holder. Ten 20 pound fish equals 200 pounds of the originally transferred 1,000 pounds of IFQ that would be returned to the IFQ permit holder's account on or after October 1; no remainder of a partial fish would be left in the GAF account.

$$10 \text{ GAF} \times 20 \text{ lbs/fish} = 200 \text{ lbs remaining}$$

If the conversion factor is an average weight of 22.57 pounds per fish and only 40 of the 44 leased GAF fish were harvested, then 4 fish can be converted back to IFQ pounds; but just over a quarter pound is forfeited:

4 GAF x 22.57 lbs/fish = 90.28 IFQ lbs, rounded to 90 IFQ lbs

2.2.3.9 Transfers of IFQ and GAF

2.2.3.9.1 Approvals

NMFS would not process applications to transfer IFQ pounds to GAF until after IFQ is issued for a fishing year. The issuance date may vary with the start of the IFQ season but typically the issuance date occurs in early- to mid-February. NMFS would have to approve applications to transfer IFQ or GAF submitted by IFQ and charter halibut permit holders before they would be effective. Leases converting IFQ pounds to GAF would be effective from the time NMFS approves an application for lease and makes the conversion to GAF until NMFS converts GAF back to IFQ pounds for deposit in the transferor's IFQ account. Conversion would occur either under a transfer application approved by NMFS, or when NMFS converts all unused GAF back into IFQ pounds, on or after 12:01 a.m. October 1 annually. Leases of IFQ pounds to GAF would expire annually; applications for lease of IFQ pounds to GAF must be submitted to and approved by NMFS each fishing year.

Transfers could not be approved if the IFQ or GAF permit holder is unable to conduct transfers as a result of delinquent IFQ cost-recovery fees, NOAA sanctions, or for other programmatic, administrative, or legal reasons; or if the proposed GAF recipient is not eligible to receive GAF due to a use cap, or for similar administrative or legal reasons. QS used to convert IFQ pounds to GAF would be non-transferable while in use as GAF.

2.2.3.9.2 Community Quota Entities

Requirements for GAF account management would be applicable to community quota entities (CQE) that hold a Community Charter Limited Entry Permit and a GAF permit. A CQE may lease up to 100% of its annual IFQ for use as GAF on their own charter halibut permits. **Council guidance is needed relative to CQE leasing. Could a CQE lease GAF from another CQE or an IFQ permit holder in an amount up to 100% of the originating CQE's separate IFQ holding?** As written, a CQE with a charter halibut permit could lease their own IFQ but it is not clear if the limit on the amount of IFQ that can be leased (100%) can also apply to another IFQ holding.(see section 2.5.6.1 of the analysis).

2.2.3.9.3 Transfer Caps

Under Alternative 2, the number of GAF any licensed charter vessel operator may receive would be limited to between 200 and 400 fish (and potentially up to 400-600 fish if the charter halibut permit is endorsed for 6 or more lines); and each IFQ permit holder would be limited to an annual conversion into GAF of 1500 lb or 10 percent (which ever is greater) of his/her IFQ account. This 1500 lb/10 percent conversion cap applies to a person who holds both a commercial IFQ permit and is a licensed charter vessel operator and wished to convert his/her own IFQ for use as his/her own GAF. **NMFS requests clarification on the Council's intended basis for this 10 percent IFQ conversion limit. The limit could be based on QS held, or on IFQ pounds in an IFQ account, and either at the start of the year, or at the time of a GAF lease application.**

Because an IFQ account might include pounds from previous commercial leases in addition to pounds derived from the permit holders own QS, the 10 percent IFQ to GAF conversion limit is more appropriately based on QS held. If at the start of the fishing year "QS pounds" is used, the conversion limit could be adjusted by the positive or negative IFQ adjustments made to the account from the prior year of fishing. This limit would then be a fixed annual IFQ pound conversion limit for the IFQ holder regardless of changes in QS holdings. An IFQ limit that is fixed throughout the year would simplify operational planning and compliance for IFQ permit

holders and tracking and enforcement of the limit for the Agency. However, as an alternative, the Council might wish to consider a limit based on IFQ pounds from QS held at the time of each GAF lease request. This method results in a flexible limit that changes with QS transfers. In this case, it is important that a person not be considered to have exceeded a cap if they had made prior GAF leases after which their QS holdings decreased.

Transfer applications would require that transaction participants provide the IFQ pounds to be leased to licensed charter vessel operators and number of GAF to be converted back to commercial IFQ pounds.

A transfer of IFQ pounds to a GAF account could be requested and processed at any time between the date IFQ is issued by NMFS, and October 1 of the same year. Transfers of GAF back to the IFQ account of the Leaser could be processed from the date the GAF are leased and transferred to a GAF account until October 1. GAF remaining unused at midnight on September 30 would be automatically transferred by NMFS back to the originating leaser's account as IFQ on or about October 1st for use in the commercial sector and in computations of annual IFQ accounts for the following year.

For fee assessment and computational purposes, leased GAF that are harvested would be part of the originating IFQ permit holder's fee liability. To enable unequivocal tracking of IFQ and GAF transactions and to avoid unnecessarily complicating a new year IFQ account and adjustment computations, halibut leased as GAF could not be resold by the GAF permit holder either within the charter sector or to another IFQ permit holder. For the same reasons, QS transferred for use as GAF could not be transferred by the person who holds the QS to another person while in use as GAF. Reselling (releasing) of IFQ leased from another IFQ holder would be prohibited.

GAF accounts that were overfished would result in a loss of halibut resource. There are no provisions for deducting GAF account overages from any sector. Any harvest of GAF over the number of fish authorized on a GAF permit would be a permit violation by the charter halibut permit holder with the GAF lease and handled as an Enforcement action. Such actions would not affect commercial IFQ permit holders or accounts unless the Office of Law Enforcement (OLE) determined that the IFQ permit holder's actions contributed to the overage. The number and extent of GAF overages and therefore the effect on the halibut resource that would occur is unknown, but expected to be small. GAF accounts would be expressed in numbers of fish, denominations that are easy to report and track.

2.2.3.9.4 Transfer Methods

The mechanisms for the transfer of GAF to and from the commercial sector would be similar to transfer processes already in use by the Alaska Region in the commercial halibut and sablefish IFQ program, BSAI Crab Rationalization Program, Rockfish Pilot Program and Amendment 80 Program. Requested transfers between IFQ and GAF accounts would require a paper application with signatures of each party to the transfer, or, if parties provide NMFS appropriate written, signed authorization, could be accomplished by their agents. Paper transfer application forms would be made available on the Internet or by contacting RAM as noted above.

Additionally, as GAF transactions are essentially leases of annual allocation between known commercial IFQ holders and licensed charter vessel operators, the Agency may offer an additional electronic, Internet-based transfer process to be used in lieu of the paper system. If offered, electronic transfers would be available via secure login using personal user IDs, and passwords that constituents can maintain. This would facilitate fishing and business operations by avoiding the necessity to submit paper forms, wait for RAM staff to process applications

during business hours, and for new or revised IFQ and GAF permits to be issued and returned by mail or other allowed means.

NMFS would collect information on GAF lease and transfer for evaluation purposes and parties to the transfers would have to certify the accuracy of the information provided. This is typical of transfers in other management programs and could include: identification and contact information of the IFQ permit holder (lesser) and GAF recipient (lessee), identification of the type and amount of IFQ pounds or GAF to be transferred, lease price and broker information.

The current IPHC area-specific, length to average weight, conversion key used to convert from IFQ pounds to numbers of GAF would be included with the transfer application so that each party could calculate the resulting number of GAF derived from a specific number of IFQ pounds. IFQ pounds would always be converted to number of GAF displayed on permits. GAF would be managed as whole fish; all IFQ pounds and GAF would be converted to round pounds and fish, respectively, at the time of conversion; fractional remainders would be forfeit.

2.2.4 Reporting and Recordkeeping

2.2.4.1 Electronic GAF Harvest Reporting Requirement

Real time reporting of charter GAF landings, and other GAF account and permit information is essential to support participant access to current account balances for account management and regulatory compliance, and for monitoring of account transfers and GAF landings history. Management personnel need real-time account information to manage permit accounts, conduct transfers, assess fees and generate accurate public data reports that track harvest. Enforcement personnel need real-time account information to monitor GAF leases and monitor compliance with authorized GAF harvests and other program rules. NMFS plans to provide GAF program participants these services through a secure Internet system similar to that already in use by IFQ account holders; and perhaps with additional means such as an Interactive Voice Recording (IVR) telephone service to serve GAF permit holders without Internet access.

In addition to reporting GAF harvests electronically, NOAA would require that a GAF charter record would have to be maintained onboard any vessel and that certain information would have to be entered into that record. Ideally, NMFS prefers that a Federal GAF harvest report be maintained for this purpose. However, because ADF&G already requires a saltwater charter logbook and has agreed to revise the logbook to accommodate NMFS' GAF program data collection needs, certain provisions of the ADF&G logbook could be required by Federal regulation. This approach would remove the need for a separate Federal charter vessel logbook.

2.2.4.2 Reporting Responsibility

Both the GAF permit holder and the State licensed guide for the trip on which GAF were harvested would be held jointly responsible for timely and accurate reporting of GAF harvest; although either could submit required reports.

2.2.4.3 Reporting Timeliness

GAF reports would be required for any calendar day in which GAF were harvested. Ideally daily GAF harvest reports would be electronically submitted prior to offloading any GAF halibut and before clients, the guide, or vessel operator and the vessel leave the point of landing. This may not be practical in some cases. Therefore, NMFS would require that at a minimum, with the exception of the GAF harvest confirmation number, all logbook information must be entered and electronic submission of the GAF harvest report completed before any GAF anglers, the guide or operator disembark the vessel and before the vessel leaves the offloading location. In addition, the

daily GAF harvest report must be submitted electronically within 2 hours of the end of the fishing trip and before the end of the calendar day in which the GAF harvest occurred.

2.2.4.4 Required Data Elements

Although real time data are necessary for accurate account management, the amount and type of data required for inseason GAF account management are relatively small and simplistic relative to that required for onboard logbooks. For GAF account management purposes NMFS requires:

- Guide's State license number;
- Vessel State of Alaska registration (AK) number issued by the Department of Motor Vehicles, or US Coast Guard documentation number;
- Saltwater logbook number;
- For GAF permits used by a CQE holding a Community Charter Limited Entry Permit and a GAF permit:
 - Community charter departed from;
 - Community charter returned to;
 - Date of GAF harvest (might be a reporting system default);For each GAF permit and IPHC area account to be debited:
 - GAF permit number;
 - IPHC regulatory area where halibut harvested; and
 - Total GAF harvested in that IPHC regulatory area.

Upon receipt of the daily GAF harvest report, NMFS would respond with a confirmation number as evidence that the harvest report was received by NMFS and the GAF account was properly debited. The confirmation number would be required to be entered by the charter vessel operator on the page of the State saltwater logbook with an entry corresponding to the same GAF fish harvest before the end of the calendar day on which the GAF halibut were harvested. This record of confirmation number would allow cross reference of the logbook and the daily GAF report.

2.2.4.5 Data Retention

Completed original ADF&G logbooks would have to be retained by the owner/operator (originator) for 3 years, and made available for inspection by NMFS-authorized staff.

2.2.4.6 IFQ and GAF Reporting Methods

In the commercial IFQ program, landings must be reported by Registered Buyers electronically, using a secure, password-protected Internet-based system approved by NMFS. The final steps of the electronic IFQ reporting process generate a time-stamped receipt displaying landings data. Commercial Registered Buyers must print and along with the individual IFQ fisherman must sign copies of the receipt, which must be maintained and made available for a specified time period for inspection by authorized Agency personnel. Printing of this receipt indicates the report sequence is complete and the IFQ account(s) has been properly debited.

Secure electronic reporting also would be required for a GAF program but several technologies would likely be needed to provide essential services to a GAF fleet that would be widely distributed throughout remote locations in halibut IPHC regulatory areas 2C and 3A. At this time, NMFS is contemplating an Internet-based reporting and an Interactive Voice Reporting (IVR) system. The Internet-based reporting system is similar to a legacy IFQ system still in use by some commercial Registered Buyers and is simple and convenient. The IVR system is similar to those commonly used in diverse commercial applications such as renewing drug prescriptions

and renewing permits. As in the IFQ program, a paper-based backup system could be provided for the rare times when an electronic option was not available.

To address the rural locations without Internet connectivity in which many charter operations occur, an IVR system (i.e., a system of reporting via telephone) may be more practical. In February 2005, Westmann & Associates, Inc. (WAI) prepared a feasibility study for NMFS on an IVR system for charter halibut data collection (NMFS Sustainable Fisheries Interactive Voice Response System for Halibut Guided Charter Data Collection Feasibility Study). This document, while several years old, provides system requirements, sources and costs estimates that NMFS could use in determining whether or not an IVR system would be more cost effective than an internet based reporting system. As noted in the WAI report, "The primary benefit of an IVR system for the Halibut Sport Charter data collection program is that it would provide an alternative to the web for data reporting when Internet access is unavailable (i.e., when fishing at sea, or for guides without Internet access) or for users who prefer using the phone over the Internet." WAI surmised that an IVR system solution "provides a benefit to the fishermen (data reporters) and in turn may improve the timeliness and quality of the data reported."

In addition to electronic reporting methods provided, NMFS would provide a paper-based backup system for reporting GAF harvests. This "manual harvest report" system would support required GAF reporting in relatively uncommon circumstances of short duration during which NMFS' electronic services are not functional, or in some other cases authorized at the discretion of OLE. In these cases, the submitter would contact OLE Data Clerks to resolve the reporting issue. Data Clerks are available via a toll-free 800 number 18 hours per day, from 6 a.m. to midnight. If a "manual harvest report" is authorized by an OLE Data Clerk, then the submitter would fax a signed report to the Data Clerk who would post the harvest data to the appropriate permit accounts. Submitters would receive a confirmation number indicating the report was received and the GAF account properly debited.

2.2.4.7 Data Correction

Charter operators should not have trouble accurately reporting the individual number of fish harvested as GAF. Correcting the GAF daily report after it is submitted would be difficult because the data to verify what is correct versus in error are in the logbook and not immediately available for review. As in the commercial halibut IFQ program, any changes to a GAF harvest record after submission to NMFS would need to be reviewed and approved by OLE personnel. In practice, an error report submitter would send a record of errors to OLE Data Clerks, the contact point for all requests to amend harvest data reports. Because verification is difficult, OLE authorization of an amendment to a GAF harvest report would be a rare event. In addition, a GAF harvest report that debits fish from a GAF account that already had GAF transferred back to the originating IFQ permit holder might be problematic, and would be handled on a case-by-case basis.

2.2.4.8 Other GAF Account Services

In addition to electronic harvest/landings reporting, IFQ holders use secure, password-protected Internet access to on-line services during extended and non-business hours: to check their quota holdings and IFQ permit account balances, pay fees, obtain landings data, and for other services. They also have regular public access to non-confidential program data and reports routinely posted on the NMFS web site.

GAF permit holders also would use unique NMFS Person IDs and assigned passwords to access NMFS' online reporting systems and services. Each person (individuals and business entities) issued a GAF permit would already have been issued a NMFS person ID and password at the

time NMFS issued them a Charter Halibut Limited Entry Permit (if not before). GAF program participants would use NMFS' online services to report GAF harvests, account monitoring, and for other purposes either similar to those used by commercial IFQ participants, or for needs specific to the GAF program. Both IFQ and GAF account information would be accessible by OLE for GAF harvest monitoring and enforcement.

For any approved reporting system, NMFS would provide User Guides and customer support. Customer support for routine management, regulatory, and account assistance is currently provided during business hours by RAM staff. During extended hours, these services are provided by OLE Data Clerks. Both groups are available via a toll-free 800- number. Addition of the Charter Limited Entry and GAF programs is expected to require modification (expansion) of the contract under which Data Clerk services are provided. Increased program costs would include contractual costs and additional training of support staff and would be assessed through added IFQ cost recovery fees.

2.2.4.9 Enforcement

As in all other permit programs, information provided on applications and landing reports must be certified as correct and complete to the best of the applicant's knowledge. Knowingly providing false application information is a criminal and civil offense.

Harvests of GAF exceeding the number of fish authorized by GAF permits onboard a vessel (an "overage") would constitute a permit violation punishable under civil penalties at 15 CFR Part 904. Such occurrences would be handled as Enforcement actions and would not normally affect commercial IFQ holders or their IFQ accounts. Once a GAF permit overage was identified by OLE, the account balance would be reset to zero; therefore GAF accounts would never carry a negative fish balance. The collective amount of any GAF program overages would be reported to the IPHC for use in stock assessments.

One large benefit of, and one of the strongest rationales for, real-time reporting is that it enhances a constituent's ability to manage his/her IFQ or GAF account. Real time account postings also enhance NMFS' ability to monitor compliance with program requirements. Similar to features built into the commercial IFQ program, a GAF reporting system could notify OLE automatically when a GAF harvest report results in an account overage; and managers can make appropriate adjustments knowing the account information is up to date. This system capability allows OLE to respond rapidly with corrective action and provide education in a timely manner.

Enforcement of the GAF program would rely in part on the account management and reporting systems developed by NMFS. OLE has continuous, secure Internet access to NMFS' harvest and landings database as well as to permit information. If needed, a GAF reporting system could provide instant messaging for report submitters and for OLE, similar to those in use for halibut/sablefish IFQ and crab. In those systems, submitters and OLE are automatically alerted about permit violations upon NMFS receipt of a harvest report. Additional preventative checks can be incorporated in the GAF harvest reporting system to reduce the need for revisions to submitted GAF reports; for example, a flag could be added to alert the report submitter of "outlier" data during data entry, such as an unusually large amount of GAF, and allow the submitter to correct the errant data prior to submitting the harvest report.

GAF vessel operators or permit holders would record GAF harvest confirmation numbers issued by GAF reporting systems in their State saltwater charter logbook. OLE might employ any or all available documents and tools to monitor compliance and conduct enforcement activities, including but not limited to: data in logbooks and NMFS' database, participant education, post-

harvest interviews, observation of offloads, etc. and might employ joint enforcement agreements with State Agencies or the U.S. Coast Guard to monitor and enforce GAF activities.

2.2.5 Outreach

Outreach and education are critical to successful implementation of the catch sharing plan. A number of different opportunities are available in the regulatory and management process to talk with halibut fishery participants and inform them about the catch sharing program and impacts of GAF in particular.

The conditions and requirements for fishing change at least annually if not more frequently. Information could be distributed through mailings coinciding with angler or operator licensing, when an IFQ holder is notified of their annual quota, and any time a record keeping package is distributed. In addition, regular update of internet sites could impart all aspects of continuing and new requirements and regulations and appropriate actions for compliance. Similarly posting of guidelines dockside and on board the charter vessel could be beneficial. Alternatively or in addition, charter vessel operators could instruct angler/clients about current fishing practices and regulations as part of their service.

Agencies and divisions provide information to the public as a regular service. However, implementing a new catch sharing program would provide an excellent opportunity to review and strengthen existing approaches in the halibut fisheries for information transfer. Outreach efforts could introduce more comprehensive help documents to explain the structure of new programs, participant requirements, and points for stakeholder input. Cost for improving outreach through a single effort could be approximated by production of a Small Entity Compliance Guide. NMFS provides a small entity compliance guide to satisfy the Small Business Regulatory Enforcement Fairness Act of 1996, which requires a plain language guide to assist small entities in complying with a final rule. The guide is typically a synopsis that provides a general overview but not exact regulatory language. Production of a guide for one-time distribution and no additional interface or follow up costs about \$7,000.

2.2.6 Description of Costs

2.2.6.1 GAF Implementation

Implementation of the GAF program would be an extension of the commercial IFQ program, and as such, with a few exceptions, costs would be absorbed by existing staffing and under existing program administration. At this time, NMFS, including OLE, does not anticipate need for additional staff. New GAF costs would consist primarily of added catch sampling infrastructure for labor, field costs and training, and development and maintenance of a GAF IVR reporting system. Initial IVR system development costs sampling design revisions would likely be incurred prior to the effective date of implementing regulations, and therefore not recoverable under IFQ cost recovery provisions. Other GAF program administrative costs, such as travel, printing/ mailing, supplies, rent, etc. are expected to incur a low to moderate increase that would vary with scale of associated outreach effort. While actual costs cannot be estimated now, a summary of the expected cost types follows.

2.2.6.2 Program Development

Program development costs are expected to include but not be limited to: drafting and review of proposed and final rule regulatory packages; design, test, and deployment of program databases including user interfaces and modifications to the IFQ account management, transfer and fee modules; development and production of reporting and transfer applications, and informational materials; staff training, and development costs of Internet, IVR, and paper harvest reporting options.

2.2.6.3 Administrative Costs

Administrative costs to maintain the GAF program once implemented would include primarily staff time plus some equipment and contractual costs. The major cost components include: processing leases and maintaining permit, transfer, reporting, and fee systems; addressing participant appeals, customer program and reporting support; salary and training plus equipment for one new Administrative Clerk II for ADF&G ; monitoring program compliance and enforcing regulations; and possibly minor costs for an expanded Data Clerk contract.

2.2.6.4 Reporting Systems Cost Estimates

Internet-based and paper backup GAF reporting systems would be developed by NMFS regional staff or consultants, and maintained by NMFS staff. Costs for an Internet-based reporting system would consist mainly of IT Specialist time to develop the JAVA processes and work with the NMFS Webmaster to provide the public interfaces.

In contrast, NMFS staff has no experience with software to develop and maintain an IVR system and lacks appropriate hardware. NMFS would require consultant services for system design and development, and potentially for ongoing hosting and maintenance services. The Feasibility Study completed in early 2005 may now be outdated in technology options presented and costs. However, the study presented three options that ranged from a system developed by consultants and maintained by NMFS to a system entirely outsourced. Estimated one-time development costs ranged from \$97,000 to \$410,000. Annual costs for system hosting, hardware and software, and per-call use charges ranged from \$25,000, plus variable costs for maintenance, support and system enhancements, to \$108,000, plus variable system enhancement costs for an entirely outsourced system. Outsourcing appears more expensive, but could require significant staff time for both IT Specialists and other staff to provide customer help and support. In contrast to an externally hosted and maintained system, NMSF IT staff would not be available during non-business hours, and customer support would be available during limited non-business hours.

Although electronic reporting systems have development and maintenance costs, in general such systems provide much more, timely and better, quality data than do paper-based systems. Additionally, costs of data entry by NMFS staff would be low.

2.2.7 Cost Recovery Fees

2.2.7.1 Requirement

The MSA at §304 (d), 109-479 requires that cost recovery fees be collected for the costs of managing and enforcing limited access privilege programs. This includes programs such as the commercial IFQ program, under which a dedicated allocation is provided to quota holders. Fees owed are a percentage, not to exceed 3 percent, of the ex-vessel value of fish landed and debited from IFQ permits. Each year, NMFS sends fee statements to IFQ holders whose annual IFQ was used; and those holders must remit fees by January 31 of the following year.

2.2.7.2 Responsibility for Payment

The commercial IFQ holder would be responsible for all cost recovery fees on IFQ pounds harvested for his/her IFQ permit(s) and also for pounds transferred and harvested as GAF which originated from his/her IFQ account(s). Although it also benefits guided sport businesses, the GAF program is an extension of the commercial IFQ program that provides identifiable benefits resulting from increased operational and economic flexibility to holders of commercial IFQ.

IFQ holders might share these added costs with GAF users through contractual lease agreements. No additional funds are expected to be allocated to NMFS to support the GAF program other than

those derived from IFQ cost recovery fees. The MSA limits the IFQ fee percentage to no more than 3 percent of the ex-vessel value of IFQ landing made on each IFQ holder's permits. The fee percentage has rarely exceeded 2 percent of the ex-vessel value of sablefish and halibut landings.

2.2.7.3 Fee Liability Computation

Commercial cost recovery fee assessments are established by NMFS in November, after all unused GAF would have been returned to commercial IFQ accounts from which they originated.

An IFQ cost recovery fee would be levied on all pounds of halibut harvested as IFQ in the commercial fishery and as GAF in the charter fishery. IFQ and GAF that are not harvested would not be subject to the cost recovery fee; and fish harvested in excess of the amount authorized by a GAF permit, or in excess of allowed IFQ permit overages would not result in cost recovery fees owed because such overages would be handled as enforcement actions.

To determine cost recovery fee liabilities for IFQ holders, NMFS uses data reported by Registered Buyers to compute annual standard ex-vessel IFQ prices by month and port (or, if confidential, by port group). These standard prices are published in the Federal Register and are used to compute the total annual value of the IFQ fisheries. A fee percentage is determined by dividing actual total management and enforcement costs by total IFQ fishery value. Only those halibut and sablefish holders who had landings on their permits owe cost recovery fees. Fees owed by an IFQ holder are the computed annual fee percentage multiplied by the value of their IFQ landings.

2.2.7.4 Average Ex-vessel Value

The standard ex-vessel values computed for commercial IFQ harvests also could be applied to harvest of GAF fish. The area-wide (2C or 3A), annual, weighted average of ex-vessel values in dollars per pound could be applied to IFQ pounds or the GAF equivalency to estimate value of leased and harvested GAF. Without collection of point of landing data and correlation to port of landings, GAF harvests could not be assessed at the port or port group level. An average ex-vessel value for all ports in the area could be used to value GAF. An average value for all ports in an area by month could be applied to value GAF but is not considered in the first phase of the catch sharing plan. Instead the value of harvested GAF and resulting fees could be based on the average value of IFQ pounds harvested in all areas weighted by total IFQ harvests by month of the year. The IFQ holders who transfer pounds for lease as GAF could owe cost recovery fees for those GAF transferred and harvested by a charter halibut permit holder. Fees for GAF converted back to IFQ pounds and harvested as commercial IFQ pounds could be assessed fees as commercial landings with value estimated from the month of harvest and port of delivery. Subsequent phases of catch sharing could improve precision of GAF valuation by identifying the landing point or associated port. The date of GAF harvest could be assigned by the data processing system. Then standard ex-vessel prices for GAF harvests could be applied on the same month and area basis as for commercial landings.

2.2.7.5 Recoverable Costs

Only "incremental" costs, those incurred as a result of IFQ management that includes a GAF component, are assessable as cost recovery fees. GAF program development and implementation costs incurred by NMFS, IPHC, ADF&G and the Council prior to effectiveness of a catch sharing final rule and implementing regulations cannot be recovered through the IFQ cost recovery process. Agencies would absorb these start-up costs.

2.2.7.6 Costs for a Catch Sharing Program

Complete costs for a cooperative catch sharing program include all costs for managing the day to day operation of GAF data collection, catch accounting, fishery management, monitoring, enforcement, reporting and regulation updates. Detailed costs are not determined for each of these program components but the range of annual activities needed to support and run an efficient program would include all aspects of administering a GAF program, outreach, processing GAF leases, collecting, correcting and reporting of GAF data, monitoring of GAF fishing and offloads for GAF program regulation compliance, enforcement of GAF regulations, prosecution of GAF violations, writing and processing an amendment of the GAF program regulations, annual reporting and review of GAF harvests, analysis of allocation and management measure affects on GAF harvests.

2.2.8 Long Term Costs

2.2.8.1 GAF Program Data Confidentiality and Reporting

All GAF data collected from constituents or generated by NMFS would be subject to confidentiality restrictions and released only in aggregate form under requirements of the MSA and other applicable law.

In addition to information made available to GAF and IFQ account holders, NMFS anticipates that non-confidential information about the GAF program would be made publicly available. Public uses of the data include: data sharing; Council analyses of charter halibut regulatory amendments and reports on halibut catch sharing; and IFQ halibut and sablefish, and halibut IFQ and GAF program activities. Such information would likely include: lists of GAF permit holders; summaries of transfers between IFQ and GAF programs; summaries of GAF harvests and overages; counts of persons leasing up to allowed caps; and program management and enforcement activities and costs.

2.2.9 Long Term Initiatives

Long term initiatives are included in this Implementation Plan to point out issues that are not within the scope of the current action. Issues remain with the precision of estimated average weight, the duration of the feedback loop, and the need for a practical method to gauge charter harvest as the charter allocation is approached or exceeded in the future. These issues are not new, but have been deferred as a result of previous Council decisions that recognized reasonably foreseeable future actions that could lead to solutions.

2.2.9.1 Estimation of Average Weight

For measuring GAF in numbers, a study should be developed to check the appropriateness of the average weight assumed by area for converting between IFQ pounds and GAF numbers. This entails evaluating the design of the in season sampling program for sampling GAF lengths from the charter halibut fishery. It is unknown whether the extent of in season sampling of the lengths of GAF from the charter halibut fishery in Areas 2C or 3A would be sufficient to represent the average length (converted to weight) of IFQ fish landed by the commercial fishery in those areas. The concern is whether the degree of resolution would be sufficient for equitable conversion between areas where each of the fleet's fish.

Improving the accuracy of the estimated average weight of charter halibut could require adding sites to the port sampling programs ADF&G conducts during the charter halibut season throughout Areas 2C and 3A. Currently, sites are distributed along road systems near communities. Remote lodges are typically not sampled making them a likely candidate for added sampling effort. Sampling sites should be added where GAF would most likely be encountered. It is anticipated that GAF would only be harvested if there are regulatory mechanisms in place that restrict the allowable harvest below the demand. Therefore, GAF use is anticipated to occur more

in Area 2C than in Area 3A, at least initially. The estimated cost of a catch sampling program for Area 2C remote lodges for ADF&G salaries and benefits would be roughly \$80,000. This estimate might be higher or lower for other agencies to operate the program (NMFS, IPHC, or private contractors.) Similar costs would be expected for a remote lodge sampling program in Area 3A.

The extent of work to change the sampling design and add sites depends on the sampling assumptions. The amount of GAF harvested in a given year is unknown, but would probably make up a small portion of the overall charter harvest in a regulatory area, at least initially. Also unknown are the temporal and geographic distributions of GAF. If GAF landings are patchy in either time or area, then the precision of an average weight estimate for GAF is likely to be low relative to an average weight estimate for common pool harvest. Variability in mean weight does not result in biased estimates if the sample size over time is proportional to the magnitude of harvest. However, if a temporal component of the harvest is disproportionately sampled, and the mean weight during that period is especially high or low, estimates of mean weight for the season could be biased. Neither the SWHS nor the port sampling interviews provide the information needed to estimate the temporal pattern of harvest by charter or private anglers. The charter logbook, however, provides information on effort. These assumptions point to the importance of thoroughly evaluating the sampling of GAF throughout the distribution of offloading sites and range of offloading times to get a representative sample of GAF to estimate GAF average weight.

It is unknown at this time whether the existing in season sampling programs that collect halibut length data by port and point of landing are sufficient to differentiate specific effects on average weight of an area's sampling design, management approach, and fishery type and the other issues addressed above. Findings from evaluation of the common pool and GAF average weight estimates could be used to tailor in season sampling programs. Additionally, because different regulatory requirements or other selective fishing pressures may also affect size of common pool and GAF charter-caught fish, differences in halibut length and weight may occur and need to be accounted for over time.

2.2.9.2 In Season Sampling for Average Weight

Currently, ADF&G in season sampling programs in Southeast and Southcentral Alaska measure the lengths of charter halibut offloaded from charter and unguided vessels. The charter halibut measured now would equate to common pool fish under the proposed element for a GAF program. Under a charter allocation with a GAF program, halibut sampled from charter vessels would equate to the combined harvest of common pool charter halibut and GAF.

Average weights currently are estimated from halibut length and weight sampled in season from the charter halibut fleet by ADF&G. These preliminary estimates of average weight are for subarea (e.g., Ketchikan, Sitka, Lower Cook Inlet, Western PWS, etc.). They are weighted by the proportion of harvest in each subarea to estimate the average weight by IPHC regulatory area. Preliminary estimates of harvest (in numbers of fish) are typically compiled by September and preliminary average weight factors follow in October. Final estimates are available in the fall of the following year. The estimates of average weight and numbers of fish can be quite different between the preliminary projection and final estimates due to some raw data errors, but principally because harvests can be distributed among the ports differently than projected for sampling.

As noted in previous sections, the existing sampling program could accommodate measuring GAF using the existing sampling design at no additional cost, as long as GAF are identifiable using a harvest tag or some other means of identifying individual fish such as a length

measurement. Further changes to the sampling manual and forms to distinguish a GAF from a common pool fish could be accommodated through annual agency review and update.

2.2.9.3 Feedback Timing

Decisions on measures to manage the charter fleet harvest currently are based on a combination of preliminary and final estimates of fishery performance and the International Pacific Halibut Commission (IPHC) status of the halibut resource and stock yield. Final fishery performance data from the State's statewide survey of halibut harvest are available a year after the charter fishery season ends, typically late in the fall. The IPHC uses these data to project stock status and set the total catch level. Coupling delayed availability of data with the unknown time it could take to prepare analysis documents, select measures from the management tool box, and provide for regulatory cycle(s) to complete Federal rule making, could result in a three to four year lapse of time between a charter season and consequential management action.

Several components of the fishery management process would need to be changed to shorten the amount of time between the end of a charter halibut fishing season and the point in time when management measures that respond to that harvest take effect. First, the data collected to account for the GAF and common pool harvest would need to be compiled in real time. As outlined, this plan would accomplish real time accounting of the GAF portion of the harvest. To achieve real time accounting of the common pool harvest a new work initiative would need to be completed as suggested in Section 2.5.6 of this EA/RIR/IRFA. Second, the definition of management measures and as necessary the criteria to trigger use of a measure would need to be analyzed periodically after implementation to provide a package ready for annual update with current information. This would allow timely composition of required analyses for proposed rule making, public comment, Secretarial review and approval, and final rule effectiveness between charter halibut seasons. Last, the annual update of proposed catch sharing plan(s) for Areas 2C and 3A (if necessary) would need to be scheduled for review and action by the Council and IPHC during regularly held meetings in the fall and early winter, and followed by timely action by the Secretary of Commerce. This approach assumes the catch sharing plans are operating successfully and simple updates could become effective in the minimum regulatory time frame.

Reducing the feedback loop depends on rapid succession of the steps to estimate common pool and GAF catch through the end of the charter fishing season. An end of season estimate of catch would be needed and would require real time data collection, data entry, verification, correction, summary and reporting. A verified estimate of charter harvest would require the same speed of processing data for two independent measures of catch, such as the logbook and in season catch sampling. Complete processing of catch estimates by the end of a season would allow the Council time to evaluate the catch level against the target level and prescribe appropriate management measures in the fall and winter. Analysis could be representative of current stock status and the management circumstances. Review of management measures would proceed through a regulatory cycle for Council and Secretarial action. Timing of the IPHC estimation of available yield would not be impacted but analysis could be based entirely on final estimates of charter harvest. With this approach the management measures and season length could be established during the year prior to the fishing season in which they would take effect and would not be changed in season.

2.2.9.4 Methods

Practical methods to gauge charter harvests of halibut as a charter allocation is approached or exceeded are not addressed in the proposed alternatives to implement catch sharing between the commercial and charter halibut fleets. At issue is when does separate accounting count? Methods could be defined with concrete steps to outline when an allocation has been reached but

determining criteria for a logical management response are not an implementation activity. Developing this aspect of a catch sharing implementation plan is preliminary.

The current management approach responds to the charter fishery several seasons after harvest has occurred. This separation of action and consequence is not necessary. For example, harvest information from the 2008 charter fishery currently exists in the form of logbook data and the in season catch sampling data. These harvest data are not currently used in the direct estimation of annual harvests but they could be if funds were expended to process data sooner. A prerequisite of thorough definition of an associated funding need would be evaluation of necessary adjustments to the scope and design of existing programs for data collection, validation, enforcement, and reporting. The likely result would be real time data collection that could be used to evaluate catch, effort and value of charter halibut harvests. Post-season evaluation of harvest information would provide the Council more timely harvest data to compare to catch limits and could enhance Council selection of management measures. Revisions for real time data collection could include needed but currently unavailable data items such as refined average length data for more precise conversions between IFQ and GAF. The Council and commercial and charter fleets would benefit from a management approach based on in season data collection. However, data timeliness should not be substituted for data accuracy and the need to analyze sampling procedures for alignment with management objectives.

A reduction in the turn around time for data collected from the charter halibut fishery could allow management based on total catch from the previous fishing season. The degree of streamlining to complete required State and Federal regulatory steps would influence how quickly management could respond. Additional changes could include but are not limited to pre-preparation of documents for rapid addition of required analyses and time sure reporting to the Council and final action for regulatory review by the IPHC and Secretary of Commerce.

2.2.9.5 Future Outlook

Changes to this Implementation Plan would be expected as a result of Council direction on the catch sharing plan. The plan could be retired or expanded in the short term to include new requirements for selected catch sharing plan elements and options. In the longer term, this Implementation Plan could change through practical guidance provided by stakeholders through the rulemaking process; as a result of new solutions to implementation problems; or to simply adapt to changing circumstances.

2.3 Summary

The Implementation Plan outlines State and Federal government action to manage exchange of halibut for lease and harvest the charter halibut fleet and would implement the GAF program. The Implementation Plan anticipates expansion of existing agency programs, given sufficient funding, for cooperative and timely record keeping and enforcement of GAF halibut harvests in the short term. The plan discusses new initiatives as guidance for long term improvement in the accuracy and timeliness of charter harvest information. NMFS and ADF&G will be better able to address needed data collection, monitoring requirements, enforcement, and associated costs of a catch sharing program after the Council identifies a final alternative and any elements and options to implement catch sharing for Area 2C and 3A charter halibut fisheries

2.4 List of Contributors

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Mission: to promote cooperative economic development that preserves the essence of the community while enhancing the quality of life.

September 25, 2008

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W 4th Avenue, Suite #306
Anchorage, AK 99501-2252

Dear Mr. Olson and Distinguished Council,

As the Executive Director of the Homer Chamber of Commerce and representing the 13 members of the Board of Directors, I would like to clarify to the Council a letter that was sent to you on September 22, 2008. Our letter requested that the Council take no action on agenda items C -1b and C -1c at the October 2008 meeting because of the lack of comparative economic analysis.

This letter has since caused a point of contention with some of our members of the commercial fishing industry. The letter was not intended to create such contention or to cause further delay of the North Council formulating a viable solution. The Board of the Homer Chamber of Commerce truly believes that a request for further economic data on the impact of the recreational sport fishing industry, particularly in area 3A, is necessary in order to better represent our diverse members and to make fair and informed decisions on their behalf.

On Thursday, September 25, 2008, the Board held a special session to revisit the content of the letter, and decided that a point of clarification and intent may be necessary. The allocation of this renewable resource affects the livelihoods of a significant percentage of our membership and our community. The Chamber's Board feels that it needs the most recent economic data to review in order that they can provide our membership a clearer understanding of the economic impact of the entire 3A fishery.

The Homer Chamber Board of Directors is comprised of dedicated citizens and business leaders whose only intent is to be more informed on this very complex issue that impacts our entire community. Therefore, I urge the North Council to consider their efforts and the letter in reference, as a request for statistical economic data.

Sincerely,

A handwritten signature in black ink that reads "Tina Day". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Tina Day
Executive Director

Chairman Olson and Council Members:

I am Patricia Phillips, Mayor of Pelican, Alaska. This is year five as mayor. You have in your packet my written statement as well as an affidavit submitted on behalf of the City of Pelican. My comment is to reiterate the impact of halibut charter harvest to the City of Pelican. Pelican is a small rural fishing community in SE Alaska. We recently celebrated 70 years in existence as a commercial fishing community. Economic opportunities are virtually limited to commercial fishing and the Pelican City Council works hard to preserve its commercial fishing lifestyle and places great emphasis on protecting this quality of life. However, our economy has diversified into recreational opportunities.

Pelican is a first class city. The annual expenditures are based on local, state, and federal revenues. Of significant importance is raw fish tax, which is 3% of ex-vessel value, collected by the State of Alaska, of which half is returned to the City. The poundage harvested by the charter industry directly adversely impacts the City's budget.

It takes \$875,000 of gross recreational profits, based on 4 % sales tax on services provided, to equal \$35,000 raw fish tax revenues to the City. However, charter fishing activities take place outside City limits thus no tax revenues are collected on charter services provided.

The current level of animosity within the community that is caused by the displacement of the local resident commercial fishing sector by the charter fishing sector is of serious concern.

Childhood friends are now virtual enemies, with propaganda displayed in mean-spirited fashion. Most local charter operators in Pelican are conscientious and want resource conservation measures for the long-term viability of the resource and economic sustainability. However, a greater percentage of the charter businesses in Pelican are seasonal operations. They reside in Pelican several months of the year and then leave for other locations. Yet there is an expectation by these seasonal operations that the City will continue to provide water, sewer, trash, fuel and electricity and maintain harbor, ferry dock, and seaplane float and other public use infrastructure.

The challenge for the City is to pro-rate a fair share of the costs of these services to all users.

The Advisory Panel has forwarded a Catch Sharing Plan with recommendation for Council approval. The IPHC has expressed cautious concern from a stock health standpoint.

The September 19, 2008 IPHC letter to Eric Olson, Chair, NPFMC states, "The lack of compliance with GHM targets will exacerbate the present conservation problem in Area 2C."

I contend that any delay by the NPFMC to address the problem statement will not only adversely affect the adherence to catch limits assigned by the IPHC, but will also undermine the economic foundation of many coastal fishing communities.

Option 1(a): fixed percentage based on existing guideline harvest levels 2C 13.1% and 3A 14.0% is an essential factor in recognizing the specific historical use of the halibut resource.

The NMFS is the federal agency responsible for implementation and compliance to the GHL. But a basic component grievously missing is adequate reliable accountability of harvest catch rate by the charter sector. The unbridled, unchecked, and unreported harvest by the charter sector for the past two decades must be curtailed. Citizens at the local level are aghast at the blatant level of disregard to catch reporting by the charter sector and lack of monitoring efforts by the pertinent governmental agencies. Not only is the stewardship responsibility by the resource managers severely diminished but a great deal of uncertainty at the local level creates a climate of distrust and ambiguity.

The Catch Sharing Plan was examined and analyzed by staff at the direction of the Council. Then put forth for public review and comments. The plan has been expanded upon by the Advisory Panel with elements that address management objectives consistent with the April 7, 2008 Council Action on Charter Halibut Catch Sharing Plan for Area 2C and 3A problem statement. This due diligence is precisely the reason this recommendation by the Advisory Panel should be approved by the NPFMC for final action at this meeting.

Patricia Phillips

PO Box 109

Pelican, AK 99832

Marty
Reynolds
(C-1a-b)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SCOTT VAN VALIN, <i>et al.</i> ,	
Plaintiffs,	
v.	Civil Action No. 08-00941
THE HONORABLE CARLOS M. GUTIERREZ, in his official capacity as Secretary of Commerce, <i>et al.</i> ,	
Defendants.	

AFFIDAVIT OF WILLIAM LUEDKE, ON BEHALF OF
THE CITY OF PORT ALEXANDER

1. We the City Council of the City of Port Alexander and on behalf of the City of Port Alexander, SUPPORT implementation of the one halibut daily bag limit for charter clients in the Southeast (2C) Alaska management area in 2008. The one halibut daily limit is necessary to constrain charter harvest to the sector's Guideline Harvest Level (GHL) thereby protecting Southeast halibut stocks from over harvest.
2. The survival of Port Alexander as a community depends on viable access to healthy and abundant marine fish stocks. Residents support sustainable management of marine fisheries, and believe harvesting allocations should be directly tied to resource abundance.
3. The Southeast halibut stock is estimated by the International Pacific Halibut Commission to be near historically low levels of abundance. Catch rates have dropped

for all sectors. The Southeast setline halibut quota has been reduced by 43% over the two years to conserve the resource and allow rebuilding.

4. In 2003 a guideline harvest level (GHL) was established for the halibut charter fishery in Southeast to place an upper bound on charter harvest. The GHL, as established stairsteps down as halibut abundance declines. Declines in halibut abundance did not trigger the stair step until 2008, when the charter GHL dropped from 1.4 million pounds to 0.931 million pounds.

5. The halibut charter sector has exceeded its GHL for the past four years. During the first two years of that overage, the halibut setline quota was reduced to compensate for the overages and prevent over harvesting the halibut resource. These reallocations impact Port Alexander fishermen and our community, since the economic survival of the community depends on the commercial halibut and salmon fleet. In 2006 the charter sector's GHL overage also caused an overage of the area Constant Exploitation Yield (CEY), or the amount of fish that can be annually harvested on a sustainable basis. In 2007 and 2008 charter halibut harvest control restrictions were recommended by the International Pacific Halibut Commission (IPHC) and North Pacific Fishery Management Council, respectively, to prevent CEY and GHL overages. Assuming that these controls would be effectively implemented by June 1st of the respective years, the IPHC set fishery catch limits after using the GHL as the proxy for harvest. If the one halibut daily limit is not implemented in June, the halibut charter GHL will once again exceed its GHL and will likely cause a CEY overage. Over harvesting the resource during this time of low abundance creates a serious resource concern; over harvesting catch limits four

years straight years when the resource is at low levels jeopardizes the future of our community and the future of all who depend on the halibut resource.

6. Port Alexander residents have participated in developing a management plan for the Southeast halibut charter sector through the North Pacific Fishery Management Council public process for the past 15 years. Hundreds of concerned fishermen have provided testimony urging the Council to establish a charter halibut GHL, and effectively manage the charter sector to that GHL. The one halibut daily bag limit is the first effective halibut charter management restriction implemented as a result of that process. Suspending implementation of this limit will decrease the public's confidence in the regulatory process.

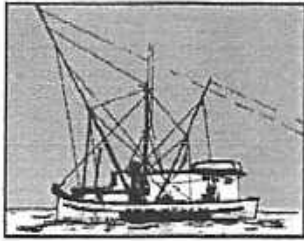
7. Port Alexander supports sustainable harvest and conservative fishery management. Sharing the burden of conservation encourages conservation and good stewardship in fishery harvesters. Reduced quotas impose economic hardship on all who make their living from harvesting the resource, but are necessary to protect the long-term health of the halibut resource. Our community depends on the halibut resource for sustenance and livelihood. The one halibut daily limit is necessary to ensure charter harvest is restricted to the sector's GHL, the resource is not over harvested, and fishery dependent communities such as Port Alexander survive.

I, as mayor pro-tem, hereby declare and certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct. It is based on my personal knowledge, and if I were called to testify in this court proceeding, my testimony would be the same as what is contained in this Affidavit.

Dated: June 17, 2008



William Luedke, Mayor pro-tem



Alaska Trollers Association

130 Seward St., No. 211
Juneau, Alaska 99801
(907) 586-9400
(907) 586-4473 Fax

Testimony of the Alaska Trollers Association to the North Pacific Fisheries Management Council Halibut Allocation

Good afternoon Mr. Chairman and members of the NPFMC. My name is Carter Hughes and I am a salmon troller that holds a small amount of halibut quota share. I fish out of Pelican and Sitka, in SE AK. I sit on the board of directors for the Alaska Trollers Association (ATA) and testify before you today on behalf of the organization.

ATA represents the salmon troll fleet in SE AK. The troll fleet is a small boat, hook and line fleet that targets salmon. However, many of us in the troll fleet own halibut IFQs. Although halibut is not our primary fishery, it is an important source of income and thus an issue of concern to ATA.

ATA's position is that commercial fishing is a public access conduit for the fish-eating consumer. Those that buy fish in the super market are every bit as entitled to access as those that catch fish on charter vessels. Quite frankly, there are more fish eating members of the public that buy commercially caught fish in the store than catch them on charter boats in AK.

It is also ATA's position that charter fishing is commercial fishing. Charter fishing is an industry that derives its income from the harvest of fish. One of the primary differences between charter fishing and commercial fishing is accountability with respect to management and conservation. The burden of conservation is carried by the "commercial" group, which is regulated by an IFQ system, an expensive investment.

The charter sector, by comparison, is an unconstrained commercial user group that wants to have potential growth even during times of declining abundance. This is particularly true in SE AK where the area 2C quota has been cut by 43% in the past 2 years, the entire burden being shouldered by the IFQ sector. As management bodies such as the IPHC and later the NPFMC have sought to constrain the charter sector by implementing a one fish bag limit, the charter fleet has wiggled out of its conservation responsibility by changing the venue until eventually the decision left the groups with fishery management expertise and ended up in the Federal Court system. Clearly, conservation is not of concern to the SE AK charter sector.

We think the Council and user groups would be served by a standard similar to king salmon allocation in Southeast, where both the commercial and sport sectors are held to their respective hard cap quotas, which are based on abundance.

ATA supports the elements of Alternative 2 that hold the charter fleet to a hard line allocation that fluctuates with abundance. This is consistent with not only king salmon, but also lingcod in Southeast.

Charterboat operators should not receive an increase from the current GHL. The current GHL was generous at the time of its implementation and all sectors agreed on it. At 125%, it had an unprecedented room for growth built in. Any increase in the charter percentage allocation beyond its current level should be fully compensated through the leasing of IFQs from the setline sector.

Finally, I would like to state that the "New Alternative" proposed by certain members of the taskforce and their lobbyists, with its 2 fish annual bag limit and no annual limit until halibut stocks are severely depressed, is a recipe for disaster in area 2C. It will greatly antagonize the current depletion problem and destroy the economies of most of the rural communities, which depend far more heavily on subsistence and commercial fishing than they do on charter fishing. This alternative fails to meet the problem statement currently before the Council and thumbs its nose at conservation for all areas by ignoring regional depletion problems and waiting until the coast wide stocks are at very low levels before acknowledging any responsibility to conserve stocks.

Also, ATA believes that trawl bycatch numbers and area 3B and 4 halibut harvest numbers have little to do with setline and charter harvest in SE AK. Anyone who uses this claim is willfully misrepresenting harvest data.

Thank you all very much.

NPFMC,

In 1981 the fishing village of Elfin Cove had one charter boat. Now the same village has more than 30. This charter boom has occurred statewide at the expense of local sport fishermen, commercial fishermen and the consumer with too little, belated regulation from those agencies responsible for fisheries management.

When IFQs were implemented, charters were lumped in with sport fishing and essentially at that time halibut was a fully allocated resource. The Charter fleets GHL has grown like a cancer on that allocation and diminished all other user groups cuts. This has cost the Commercial fleet money, the consumer pounds of fish, and the local sport fishermens CPUE has dropped.

Despite all this the charter industry continues to demand more. It is time to cut back charter GHL's, institute an immediate emergency moratorium on charter boats, start a buy back program on overcapitalized charter operations, and institute an IFQ program that is separate from commercial IFQ and is allocated from the reduced target GHL.

When IFQ's were first implemented for the commercial fleet there were many who lost out, and there were others who had luck or money and won out. There are now many less commercial boats fishing halibut. Many complained but something had to be done. We are at this point now with the charter fleet. Something needs to be done. A good start is to reduce the charter GHL now

with an eye to implementing the other reforms mentioned.

Halibut is a limited resource. We have a growing subsistence take, a growing sport take, a growing charter take and a diminishing commercial take in the sector that actually represents the largest interested party-the consumer. Now is the time to consolidate the charter fleet, curb the GHL and leave those that remain with a steady business plan whose only wild card is the abundance of fish, not new entrants or new last minute regulations. Consolidation thru IFQ's was tough on the commercial fleet and it will be tough on the charter fleet but it needs to be done as it is extremely unfair for my family fishing operation and the fish eating consumer to see less fish because of an unregulated and out of control charter industry.

Thankyou,

Scott Visscher

F/V Georgia, Effin Cove and Haines AK.



Halibut Coalition <halibutcoalition@gmail.com>

Halibut 2C

Sandy Craig <icystraitadventures@gmail.com>

Mon, Sep 29, 2008 at
5:36 PM

To: Halibut Coalition <halibutcoalition@gmail.com>

North Pacific Fisheries Management Council.

Dear Chairman Olsen and Members of the Council,

I am a charter boat operator who supports a GHM based on abundance and sustainability. I have been chartering for over 25 years as a small operator. I am fully booked for 2009. I support a GHM for charter boats that will be enforceable and tied to abundance. Most of my groups did not keep any fish past day three of their trip and I did not keep more than one halibut per person per day. My clients don't complain. I did however keep a lot of big fish, 100 pounds plus that I would have preferred photographing and releasing and then having kept smaller, more edible fish. That is not easy to do with existing regulations. I would like a size limit. I would also like a one fish per day limit and an annual bag limit for out-of-state-anglers. From what I hear, the reason so many charter operators want 2 fish per day is because they are in urban areas that are over fished and they don't catch big, 50 pound fish, so they need to keep a lot more little fish to fill those boxes. That has a direct affect on local sport fishermen and subsistence users. That is not sustainable. That shows overfishing and that is what is going on in many areas.

I am changing all of my information letters to limit the number of boxes of fish to two per person each trip. I don't want to see Alaska's fisheries go the way of many of the world's fisheries. The IPHC has done a great job for over 100 years. Now it appears their hands are tied and the fishery is at stake.

I have been commercial halibut fishing since 1982 and I am an IFQ holder. I accept the 43% reduction as a necessary move for stock survival. I don't accept a reallocation of existing harvestable stocks to the charter fishery that has shown no stewardship of a limited resource.

Please act now and maintain the halibut stocks and diverse economy in Area 2C.

Sandra Craig
PO Box 13
Elfin Cove, AK 99825

NPFMC,

In 1981 the fishing village of Elin Cove had one charter boat. Now the same village has more than 30. This charter boom has occurred statewide at the expense of local sport fishermen, commercial fishermen and the consumer with too little, belated regulation from those agencies responsible for fisheries management.

When IFQs were implemented, charters were lumped in with sport fishing and essentially at that time halibut was a fully allocated resource. The Charter fleets GHL has grown like a cancer on that allocation and diminished all other user groups cuts. This has cost the Commercial fleet money, the consumer pounds of fish, and the local sport fishermen's CPUE has dropped.

Despite all this the charter industry continues to demand more. It is time to cut back charter GHL's, institute an immediate emergency moratorium on charter boats, start a buy back program on overcapitalized charter operations, and institute an IFQ program that is separate from commercial IFQ and is allocated from the reduced target GHL.

When IFQ's were first implemented for the commercial fleet there were many who lost out, and there were others who had luck or money and won out. There are now many less commercial boats fishing halibut. Many complained but something had to be done. We are at this point now with the charter fleet. Something needs to be done. A good start is to reduce the charter GHL now

with an eye to implementing the other reforms mentioned.

Halibut is a limited resource. We have a growing subsistence take, a growing sport take, a growing charter take and a diminishing commercial take in the sector that actually represents the largest interested party-the consumer. Now is the time to consolidate the charter fleet, curb the GHL and leave those that remain with a steady business plan whose only wild card is the abundance of fish, not new entrants or new last minute regulations. Consolidation thru IFQ's was tough on the commercial fleet and it will be tough on the charter fleet but it needs to be done as it is extremely unfair for my family fishing operation and the fish eating consumer to see less fish because of an unregulated and out of control charter industry.

Thankyou,

Scott Visscher

F/V Georgia, Efin Cove and Haines AK.

**AGENDA ITEM C-1(b)
Supplemental
October 2008**

NPFMC Staff projections of imposing a 1-fish bag limit starting in 2008.

Projected Area 2C allocations (Mlb) based on updated IPHC estimates of combined commercial and charter catch limit

	1a	1b	1c	1d	2a	2b	2c	3a	3b	3c	GHL
2007	<u>1.34</u>	1.77	<u>1.19</u>	1.54	1.43	1.69	1.90	1.38	1.66	1.55	
2008	1.04	1.37	0.93	1.19	1.43	1.69	1.90	1.23	1.47	1.41	0.931
2009	<u>0.89</u>	1.18	<u>0.80</u>	1.03	1.43	1.69	1.90	1.16	1.39	1.35	1.074
2010	<u>0.89</u>	1.17	<u>0.79</u>	1.02	1.43	1.69	1.90	1.16	1.38	1.35	1.217
2011	<u>0.92</u>	1.22	<u>0.83</u>	1.07	1.43	1.69	1.90	1.18	1.41	1.36	1.432

Percentage difference between Area 2C projected allocation and projected harvest

	1a	1b	1c	1d	2a	2b	2c	3a	3b	3c	GHL
2007	-2%	22%	-15%	11%	4%	19%	28%	1%	17%	11%	
2008	13%	34%	3%	25%	37%	47%	53%	27%	39%	36%	3%
2009	-4%	21%	-17%	10%	35%	45%	51%	20%	33%	31%	14%
2010	-8%	18%	-21%	6%	33%	43%	50%	17%	31%	29%	21%
2011	-7%	19%	-20%	7%	31%	42%	48%	16%	30%	28%	31%

Source: IPHC projections of combined commercial and charter catch limit. NEI projections of future harvest.

Thursday, Oct 2, 2008

Catch Sharing Plan for Areas 2C & 3A



Presented by

Jane DiCosimo, NPFMC

Darrell Brannan

Jonathan King, Northern Economics, Inc

Program Objectives

- Establish a catch sharing plan (CSP) for the commercial and charter halibut sectors in Area 2C and Area 3A.
- Request IPHC to establish a combined commercial and charter catch limit for each area.
- Set sector allocations of each combined catch limit between the commercial and charter sectors.
- Allocations will not be revised from year-to-year.

Program Objectives (cont.)

- Place the charter area allocations in common pools for use by area charter limited entry permit holders.
- The charter sector is expected to stay at or below its allocations. Management measures would be modified in future years to ensure sectors stay within their allocations.
- Exceeding the charter allocation would not close the charter fishery or alter in-season management measures.

Status Quo Alternative

Area 2C

- 2-fish bag limit, one of the halibut may be no more than 32"
- No possession by captains and crew
- 6-line limit

Area 3A

- 2-fish bag limit
- No possession by captains and crew

Program Objectives (cont.)

- The Council would adjust management measures after an overage/underage of 0%, 5% or 10% is determined to have occurred. Determining that an overage has occurred and implementing the new regulations could take 3-4 years from the year of the overage.
- Individual charter limited entry permit holders would be allowed to lease commercial halibut IFQs for use as Guided Angler Fish (GAFs) by their clients. GAFs will be exempt from measures that are more restrictive than those in regulation for non-guided anglers.

Halibut Charter: Allocation

Option 1: Fixed percentage of combined charter harvest and commercial catch limit (SWHS)

Base Years	Area 2C	Area 3A	Formula
a) 1995-99	13.1%	14.1%	$\text{Charter\%} = \frac{(CHarv * 1.25)}{CHarv + CL} \times 100$
b) 2001-05	17.2%	15.4%	$\% \text{ Alloc} = \frac{\text{Current CHL}}{CHarv + CL} \times 100$
c) 2004	11.7%	12.7%	
d) 2005	15.2%	12.7%	$\% \text{ Alloc} = \frac{CHarv}{CHarv + CL} \times 100$

Halibut Charter: Allocation

Option 2: Fixed pound allocation calculated using the average charter harvest during the base period (SWHS)

Base Years	Area 2C	Area 3A
a) 1995-1999	1.43 Mlb.	3.65 Mlb
b) 2000-2004	1.69 Mlb.	4.01 Mlb
c) 2001-2005	1.90 Mlb.	4.15 Mlb

Halibut Charter: Allocation

Option 2: Suboption: Stair-step up and down:
This option adjusts the fixed pound allocation when the total CEY or the combined commercial and charter catch limit changes a predefined percentage from the starting point selected by the Council.

Option 2a Projected Area 2C Charter Allocations Using Various Starting Points for the Stairstep Suboptions

Option 2a	CEY			2008	Combined
	1995-1999	2000-2004	2001-2005		Catch Limit
Year	Area 2C				2008
2008	0.93	0.93	0.79	1.43	1.43
2009	0.93	0.93	0.93	1.43	1.43
2010	1.07	1.07	1.07	1.79	1.43
2011	1.22	1.07	1.22	1.93	1.43
2012	1.43	1.43	1.22	2.08	1.43
2013	1.43	1.43	1.43	2.22	1.43
2014	1.43	1.43	1.43	2.36	1.43
2015	1.43	1.43	1.43	2.36	1.43

Option 2a Projected Area 3A Charter Allocations Using Various Starting Points for the Stairstep Suboptions

Option 2a	CEY			2008	Combined
	1995-1999	2000-2004	2001-2005		Catch Limit
Year	Area 3A				2008
2008	3.65	3.65	3.65	3.65	3.65
2009	3.65	3.65	3.65	3.65	3.65
2010	4.20	4.20	4.20	4.58	3.65
2011	4.93	4.93	4.58	4.93	4.20
2012	5.29	5.29	4.93	5.29	4.58
2013	5.29	5.65	5.29	5.65	4.93
2014	5.65	5.65	5.29	6.01	5.29
2015	5.65	5.65	5.29	6.65	5.29

Source: IPHC projections of future CEYs and Combined Commercial and Charter Catch Limits.

Summary of Stairstep Suboptions

- Adding stairstep suboptions to the fixed allocation causes the fixed allocation to behave like a percentage based allocation.
- Data limitations, calculating historic coastwide CEY and combined catch limits, precluded all suboptions identified by the Council in April from being analyzed.
- Area 2C allocations are projected to change under all suboptions where CEY is used to define the starting point to measure change (by as much as 1.25 Mlb between 2007 and 2015).
- The allocation is not projected to change from 2007 through 2015 under the Area 2C 2008 combined catch limit option.

Summary of Stairstep Suboptions

- Area 3A allocations are projected to change under all stairstep suboptions, in some cases more than 2 Mlb, between 2007 and 2015.
- The suboptions result in the same general trend under the three fixed poundage allocation options.

Halibut Charter: Allocation

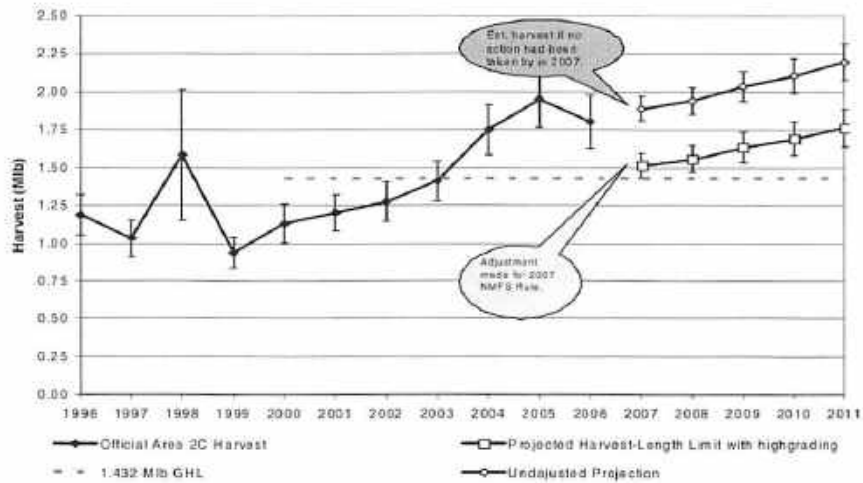
Option 3. 50% of allocation based on percentage formula and 50% in fixed pounds (SWHS).

Option	Area 2C		Area 3A	
	%	Mlbs.	%	Mlbs.
3a (125% of 1995-1999)	6.5%	0.72	7.1%	1.82
3b (125% of 2000-2004)	8.2%	0.85	8.0%	2.01
3c (125% of 2001-2005)	8.6%	0.95	7.7%	2.07

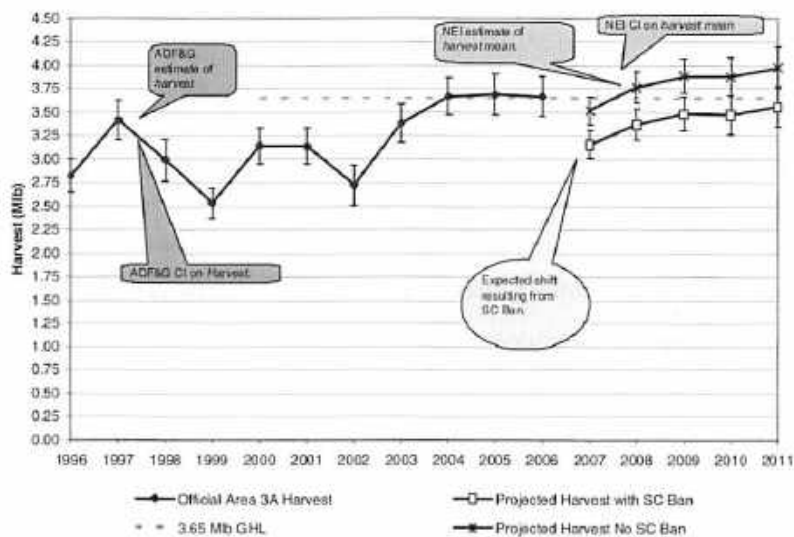
Projected Charter Harvest

- An ARIMA Model was used to generate charter harvest estimates (Areas 2C and 3A) for 2007-2011 using ADF&G harvest estimates and standard errors from 1995-2006.
- 95% confidence intervals (CI) were calculated for the harvest estimates.

Projected Area 2C charter harvest (Mlb)



Projected Area 3A charter harvest (Mlb)



Projected Allocation Compared to Projected Harvest (Area 2C)

Table 1 Area 2C allocation amount (Mlb) and its relation to projected harvest, 2007-2011

Year	Percentage Based Allocations				Fixed Pound Allocation			Mixed Allocation		
	1a	1b	1c	1d	2a	2b	2c	3a	3b	3c
2007	<u>1.34</u>	1.77	<u>1.19</u>	1.54	1.43	1.69	1.90	1.38	1.66	1.55
2008	<u>1.04</u>	<u>1.37</u>	<u>0.93</u>	<u>1.19</u>	1.43	1.69	1.90	<u>1.23</u>	1.47	1.41
2009	<u>0.89</u>	<u>1.18</u>	<u>0.80</u>	<u>1.03</u>	<u>1.43</u>	1.69	1.90	<u>1.16</u>	<u>1.39</u>	<u>1.35</u>
2010	<u>0.89</u>	<u>1.17</u>	<u>0.79</u>	<u>1.02</u>	<u>1.43</u>	1.69	1.90	<u>1.16</u>	<u>1.38</u>	<u>1.35</u>
2011	<u>0.92</u>	<u>1.22</u>	<u>0.83</u>	<u>1.07</u>	<u>1.43</u>	1.69	1.90	<u>1.18</u>	<u>1.41</u>	<u>1.36</u>

Bold font = allocation greater than harvest
 Bold and Underline = harvest greater than allocation
 Normal font = allocation is within 95% CI of harvest

Projected Allocation Compared to Projected Harvest (Area 3A)

Table 1 Area 3A allocation amount and its relation to projected harvest, 2007-2011

Year	Percentage Based Allocations				Fixed Pound Allocation			Mixed Allocation		
	1a	1b	1c	1d	2a	2b	2c	3a	3b	3c
2007	4.32	5.71	3.86	4.98	3.65	4.01	4.15	3.99	4.63	4.01
2008	3.62	4.78	3.23	4.17	3.65	4.01	4.15	3.63	4.20	3.69
2009	3.71	4.90	3.31	4.28	3.65	4.01	4.15	3.68	4.26	3.73
2010	3.97	5.24	3.54	4.57	3.65	4.01	4.15	3.81	4.41	3.85
2011	4.32	5.71	3.86	4.98	3.65	4.01	4.15	3.99	4.63	4.01

Bold font = allocation greater than harvest
 Bold and Underline = harvest greater than allocation
 Normal font = allocation is within 95% CI of harvest

New Information Since April: Charter Income from Trip Fees in 2C

Estimates of potential Area 2C charter income (in million dollars) for the years 2007-2011 based on the various allocations

Year	Percentage Based Allocations				Fixed Pound Allocation			Mixed Allocation		
	1a	1b	1c	1d	2a	2b	2c	3a	3b	3c
2007	12.54	16.56	11.20	14.45	13.41	15.84	17.81	12.97	15.53	14.51
2008	9.72	12.83	8.68	11.20	13.41	15.84	17.81	11.56	13.82	13.24
2009	8.36	11.04	7.47	9.64	13.41	15.84	17.81	10.88	13.00	12.64
2010	8.30	10.96	7.41	9.57	13.41	15.84	17.81	10.85	12.96	12.61
2011	8.67	11.45	7.74	9.99	13.41	15.84	17.81	11.04	13.18	12.78

Assumptions: The average client would harvest 24 lbs of halibut per trip in 2C (the average harvest from 2002 through 2006 using ADF&G data). The average charter trip cost \$225. Charter clients took just enough trips to harvest their entire projected allocation. Revenues generated from lodging, food, and services that are charged in addition to the basic charter fee are not considered in this estimate, nor are consumer surpluses generated from the trip. All these should be considered when addressing net benefits to the Nation and are discussed in this section of the RIR.

Charter Income from Trip Fees in 3A

Table 1 Estimates of potential Area 3A charter income (in million dollars) for the years 2007-2011 based on the various allocations

Year	Percentage Based Allocations				Fixed Pound Allocation			Mixed Allocation		
	1a	1b	1c	1d	2a	2b	2c	3a	3b	3c
2007	34.65	38.12	31.43	31.43	27.38	30.08	31.13	31.01	34.71	31.28
2008	29.01	31.91	26.31	26.31	27.38	30.08	31.13	28.19	31.51	28.72
2009	29.74	32.72	26.98	26.98	27.38	30.08	31.13	28.56	31.93	29.05
2010	31.80	34.98	28.85	28.85	27.38	30.08	31.13	29.59	33.10	29.99
2011	34.65	38.11	31.43	31.43	27.38	30.08	31.13	31.01	34.71	31.28

Assumptions: The average client would harvest 30 lbs of halibut per trip in 3A (the average harvest from 2002 through 2006 using ADF&G data). The average charter trip cost \$225. Charter clients took just enough trips to harvest their entire projected allocation. Revenues generated from lodging, food, and services that are charged in addition to the basic charter fee are not considered in this estimate, nor are consumer surpluses generated from the trip. All these should be considered when addressing net benefits to the Nation and are discussed in this section of the RIR.

Halibut Processing

- Commercial
 - The commercial halibut fishery was allocated 6.2 M. Lb. of halibut in IPHC Area 2C and 24.2 M. Lb. in Area 3A, during 2008. Assuming all of the halibut were processed using custom processors at \$0.35 per pound, round weight, the income generated would be \$2.2 million in Area 2C and \$8.5 million in Area 3A.
 - This does not represent the total benefits processors derive from halibut.
 - Halibut is important to processors because it helps provide a steady supply of fish throughout much of the year.

Processors of Charter Halibut

- Fees charged to freeze and vacuum pack halibut in Southeast and Southcentral Alaska communities during 2008 ranged from \$1.00 to \$1.35 per pound, incoming weights.
- Flash freezing has an additional charge (about \$0.25 per pound).
- Filleting the halibut before it is packaged and frozen typically added an additional \$0.10 to \$0.15 per pound
- If a client only wanted the fish vacuum packed, the cost was reported to be about \$0.75 to \$0.95 per pound.
- To have the halibut only frozen was reported to cost about \$0.60 to \$0.75 per pound in 3A communities and \$0.25 to \$0.50 in 2C communities.

Processors of Charter Halibut

- We do not know the amount of halibut harvested by clients on charter vessels or the cost each person pays for processing their catch. Assuming each halibut was cleaned and dressed by the charter operator before it was delivered to the processor and the processing fee was \$1 per pound incoming weight -- 0.9 Mlbs of halibut delivered in 2C would generate \$0.9 million. In area 3A, 1.8 Mlbs of fillets would generate \$1.8 million. These estimates are probably too high because not all of the halibut harvested from charter vessels will be commercially processed.
- If charter clients all paid \$6.00 per pound to have their fish processed, packaged, and shipped to their home, in Area 2C the cost would be \$5.4 million to have 0.9 Mlbs processed and shipped. In Area 3A the cost would be about \$10.8 million.

Cost Recovery

- The maximum cost recovery fee that can be established is 3% of exvessel halibut and sablefish value.
- The halibut and sablefish cost recovery fee for 2007 was set at 1.2% of exvessel landings and reportedly yielded \$2.7 million to cover management and enforcement costs.
- The cost recovery fee for this program would apply to all halibut and sablefish IFQ permit holders.

Cost Recovery

- Assuming the harvest and exvessel prices of halibut and sablefish remain relatively stable, a \$500,000 increase in costs would increase the cost recovery fee to about 1.5%, or about 0.3%.
- Changes in exvessel prices and commercial allocations will impact the fee percentage.

Element 5 - Supplemental Use of Guided Angler Fish

- **Revises commercial halibut IFQ regulations to allow LEP holders to lease commercial IFQ and provide guided anglers with additional harvesting opportunities in excess of charter regulations, but not in excess of unguided regulations. NMFS would convert IFQ into guided angler fish (GAF).**
- **Provision A:**
 - In Area 2C, we estimate GAF availability at 50,000 to 100,000 GAF while 2011 GAF "demand" under a one-fish bag limit and the allocation alternatives could be between 21,000 and 76,000 GAF (Page 106, Table A-65). Even under 2007 conditions we would estimate GAF demand to preserve 2007 harvest conditions at approximately 30,000-40,000 GAF.
 - In Area 3A, we estimate GAF availability at 150K to 190K GAF while 2011 GAF "demand" could be 0 to 30,000 GAF depending on the allocation scenario.

Element 5 - Supplemental Use of Guided Angler Fish(Con't)

- **Highlights:**

- Provision C allows for the use of average weights to transform IFQ into GAF. Previously identified issues include when average weights become available and whether GAF average weights will differ from non-GAF average weights. NMFS staff have begun addressing these issues in their analysis of how these measures would be implemented.
- Provision E-2 includes a sub-option for an October 1 automatic reversion date to allow RAM staff time to avoid conflicts between IFQ reversions and end of the year accounting. NMFS staff have incorporating this date in their implementation analyses.
- It may be difficult for charter operators to guarantee access at the point of landing if they do not own or control that point (Prov G).

Policy Elements: not for implementation in regulation

- **Annual regulatory cycle (Element 2)**

Final action on streamlined analysis each December, as needed.

- **Management toolbox (Element 3)**

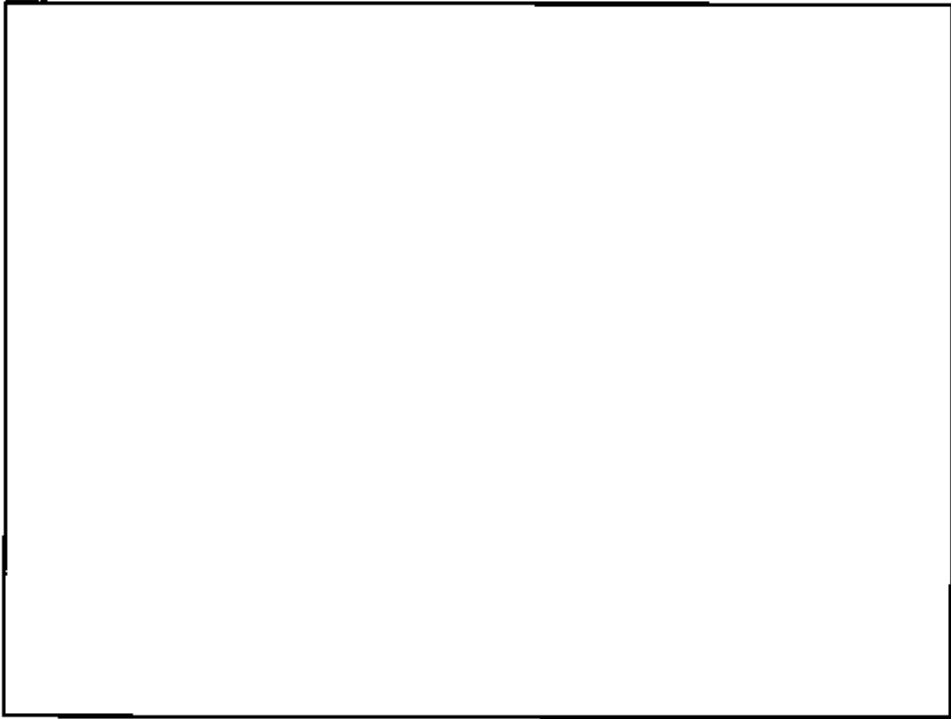
Applicability of past estimates to the future may be affected by changes in average weights, harvest composition, and angler success. Additionally, past analyses did not consider every combination of management measures.

- **Timeline (Element 4)**

3 or 4 year feedback loop depending on use of in-season data.

- **Catch accounting system (Element 6)**

Agencies seek Council guidance on required features.



The following slides will not be presented – because they have been discussed in detail at earlier meetings

2007 Logbook Summary

IPHC Area	Avg. # of Anglers/Trip	Total # Active Vessels	Avg. # Trips/Vessel	Total # of Anglers in 2007
2C	3.98	709	33.61	94,887
3A	6.04	633	38.04	145,398

Economic Impacts on the charter sector and clients

- Excess capacity in the fleet will result in the charter sector competing for clients (at least in the near term).
- Increases in client demand could result in increases in trip prices in the short run. Over the longer term competition for clients will ensure they do not earn above-normal profits.
- Clients may prefer to fish in Area 3A if they have a choice because of regulations in place

Economic Impacts on the charter sector and clients (cont.)

- Management measures (e.g., smaller bag limits or possession limits) will decrease angler surplus and angler demand. These are expected in Area 2C, but not in Area 3A, over the time period considered.
- When management measures are unchanged, client demand will increase over time.
- Decreases in stock abundance may also result in more stringent management measures

Economic Impacts on the charter sector and clients (cont.)

- The fixed poundage allocation alternatives will provide the charter sector a larger allocation. A larger allocation could reduce the need for even more restrictive management measures in Area 2C.
- Management measures needed to keep Area 2C charter operations within their allocation will likely reduce client demand and client surplus.

Economic Impacts on the charter sector and clients (cont.)

- It is not possible to determine the amount of GAF that will be leased or who will purchase the GAF.
- Because leases are voluntary transactions, one party to the transaction should benefit and the other should be no worse off after the lease.
- Charter businesses that purchase GAF from the commercial sector will realize increased costs. Those costs will be passed on to charter clients through higher trip prices. The increased costs and prices are expected to allow charter charter businesses to earn normal profits in the long run.

Economic Impacts on the Commercial sector

- Allocations that decrease commercial harvest relative to the status quo are expected to decrease net revenue and QS values, all else being equal. Charter overages have a smaller impact than charter allocation increases.
- Increased demand for charter trips does not effect the commercial sector when the charter sector is constrained by a harvest limit
- In general, Area 2C charter harvests would be constrained by the allocations. Area 3A allocations would allow some charter growth

Economic Impacts on the Commercial sector (cont.)

- Net revenues are expected to decline in Area 2C and increase in 3A in the short-run, primarily as a result of stock changes.
- Net revenue increases in Area 3A will be tempered by growth in the charter sector harvests
- In Area 2C, QS values are expected to decline
- QS consolidation is expected to occur in Area 2C if QS holders are unable to cover the costs of operation and the costs of capital.

Economic Impacts on Halibut Consumers

- Allocations that decrease the amount of halibut on the market will decrease post harvest surplus.
 - The allocations in Area 3A are expected to allow growth in charter harvests
 - Area 2C harvests are expected to be limited by the allocations in the near-term

Economic Impacts on Halibut Communities

- When a community is home to both charter and commercial activity, the reduction in expenditures by one sector will be offset, at least to some degree, by the increased activity from the other sector.
- When the amount of fish available to both sectors decreases, as happened in Area 2C in 2008, the activity of both sectors is reduced, under percentage based charter allocations, and the regional benefits from the fisheries will decline.

Option 2a -125% of the 1995-1999 average charter harvest (current GHL).

Area 2C (Baseline CEY: 11.8 M lb)			Area 3A (Baseline CEY: 30.7 M lb)		
CEY Change	Total CEY	Allocation	CEY Change	Total CEY	Allocation
+45 to +55%	17.11	2.08	+45 to +55%	44.52	5.29
+35 to +45%	15.93	1.93	+35 to +45%	41.45	4.93
+25 to +35%	14.75	1.79	+25 to +35%	38.38	4.56
+15 to +25%	13.57	1.65	+15 to +25%	35.31	4.20
-15 to +15%		1.43	-15 to +15%		3.65
-15 to -25%	10.03	1.22	-15 to -25%	26.10	3.10
-25 to -35%	8.85	1.07	-25 to -35%	23.03	2.74
-35 to -45%	7.67	0.93	-35 to -45%	19.96	2.37
-45 to -55%	6.49	0.79	-45 to -55%	16.89	2.01

**Option 2b - 125% of the 2000-2004
average charter harvest.**

Area 2C (Baseline CEY: 11.7 M lb) Area 3A (Baseline CEY: 30.3 M lb)

CEY Change	Total CEY	Allocation	CEY Change	Total CEY	Allocation
+45 to +55%	16.99	2.45	+45 to +55%	44.00	5.82
+35 to +45%	15.82	2.29	+35 to +45%	40.96	5.42
+25 to +35%	14.65	2.12	+25 to +35%	37.93	5.01
+15 to +25%	13.47	1.95	+15 to +25%	34.89	4.61
-15 to +15%		1.69	-15 to +15%		4.01
-15 to -25%	9.96	1.44	-15 to -25%	25.79	3.41
-25 to -35%	8.79	1.27	-25 to -35%	22.76	3.01
-35 to -45%	7.62	1.10	-35 to -45%	19.72	2.61
-45 to -55%	6.44	0.93	-45 to -55%	16.69	2.21

**Option 2c - 125% of the 2001-2005
average charter harvest.**

Area 2C (Baseline CEY: 12.4 M lb) Area 3A (Baseline CEY: 32.0 M lb)

CEY Change	Total CEY	Allocation	CEY Change	Total CEY	Allocation
+45 to +55%	17.97	2.75	+45 to +55%	46.40	6.02
+35 to +45%	16.73	2.56	+35 to +45%	43.20	5.60
+25 to +35%	15.50	2.37	+25 to +35%	40.00	5.19
+15 to +25%	14.26	2.18	+15 to +25%	36.80	4.77
-15 to +15%		1.90	-15 to +15%		4.15
-15 to -25%	10.54	1.61	-15 to -25%	27.20	3.53
-25 to -35%	9.30	1.42	-25 to -35%	24.00	3.11
-35 to -45%	8.06	1.23	-35 to -45%	20.80	2.70
-45 to -55%	6.82	1.04	-45 to -55%	17.60	2.28

EARL COMSTOCK
C-1(a-b)

CHTF Presentation to the Council - October 2, 2008

- The analysis before you clearly demonstrates two points: first, that all of the options before the Council will result in a permanent one fish limit in Area 2C; and second, that none of the options before you will solve the real issue, which is increasing angler demand that results in a reduction in commercial catch limits.
- The options before the Council do not address increasing angler demand. The moratorium, if and when it finally is implemented, will ultimately limit the number of guided recreational anglers, simply because there will be no spots available. But angler demand will simply shift to the unguided sector, once again reducing commercial catch limits.
- The options before you create an expensive and complicated system that does not deal with the problem. Under the options before you, the Council and NMFS will annually waste significant time and money trying to manage charter anglers harvests so that commercial catches are not reduced. You will be using the sledge hammers of one fish rules and season closures on charter operators only to see commercial catches reduced by increased harvests by unguided anglers.
- The charter sector alternative proposal does address increasing angler demand by setting a hard cap on ALL individual anglers of two halibut per day, and one halibut a day if conservation of the stocks is needed. This cap applies throughout Alaska to both guided and unguided anglers, so it also addresses shifts in angler demand to IPHC areas outside 2C and 3A.
- The charter sector alternative proposal addresses conservation in two ways. By clearly stating the rules for how many halibut recreational anglers will be allowed to take, this proposal ensures that the IPHC will properly account for recreational angler harvest in setting commercial catch limits. In addition, the proposal would set a clear point at which ALL recreational anglers would see their hard cap cut in half to contribute to rebuilding the stock if needed.
- The question before the Council is who will get priority in an area when halibut allocations are low. The charter proposal answers that question by making it clear that recreational anglers will, because even with that priority recreational anglers harvest far less than the commercial sector does.

- Providing that priority will not threaten halibut stocks – it will reduce commercial catch limits. That is what makes this a tough allocation decision.
- The Council needs to take a hard look at what it is considering here. The analysis shows that a one halibut daily bag limit, which is all that the options will allow in Area 2C, will cost Area 2C charter operators alone more than \$8 million annually in lost revenues.
- In contrast, in 2008 the IPHC assumed a one halibut daily bag limit for Area 2C and increased the commercial catch limit by the 385,00 pounds as a result of the savings from the reduced recreational catch. The result – 57 percent of Area 2C IFQ holders got 186 pounds or less added to their quota for 2008, and another 22 percent got 620 pounds or less.
- That is the reality. The commercial sector got an additional 385,000 pounds – nowhere near enough to make up for the 43 percent decrease in the commercial allocation caused by the IPHC model change. It is the model change, and not charter fishing, that is causing the economic hardship for Area 2C IFQ holders.
- Going to a one halibut daily limit in Area 2C or Area 3A will not make up for the large shifts in quota that have been caused by IPHC model changes – changes that will likely occur again in the future. If the IPHC reduces the share of the biomass they allocate to Area 2C or Area 3A because they need to accommodate Canadian demands, the problem will only get worse – and cutting charter catches will not make up the difference.
- Leasing is not an option either. The analysis raises serious questions about whether or not halibut would be available for lease, and charter operators will tell you as an economic matter leasing is not a viable option. If adopted, leasing will just be a huge added expense for commercial fishermen while providing no assistance to charter operators.
- Finally, let me close by saying that the AP motion only makes the matter worse. It deletes the only thing that charter operators got in the interim solution, which was a commitment to provide significant advance notice of changes. Under the AP motion that commitment is gone, and recreational anglers will not know what rules they will fish under until after the IPHC meeting in January each year.

10/2/08

Dear Sir/Madame:

Halibut is a great fish. Tastes great, keeps a long time and is even scientifically proven to make you live (if not love) longer. Makes it a popular dinner!!

As commercial halibut fishing is a substantial part of my livelihood and has been for the past 30 odd years, I am writing to you in hopes of clearing up some misunderstandings you may have heard regarding the recent limit that was set by the IPHC (International Pacific Halibut Committee). I only ask you to read this to see a simple commercial fisherman's point of view.

I feel for the charter fisherman and guides, I truly do. It's always a swift kick in the gut whenever they take away something you have fought long and hard to keep. I can't tell you how many times I have thought the rulings were made by some evil money fueled lobbyist representing "the other side". (Henry Mitchell)

This latest ruling isn't that way, and I will tell you why. Let me give you a little history on how we got to where we are today:

They say old fishermen never die, they just smell that way and I think that joke was made for Halibut fishermen. Was a time Halibut was fished all year long just about all over Alaska and Canada. Problem is there is only so much Halibut. They had to do something before we killed them all off.

In order to keep a stable supply of Halibut coming in every year they made new rules that allowed for a couple of days in certain months that any fishermen who wanted to could go out and collect as much as they could. Called it Derby fishing. Problem with derby fishing is you just can't pick the weather on those days. Well that and the fact that the time you had to fish was like only 3 days. A lot of bold, tired or foolish fisherman lost digits, limbs and even lives of crew, or even boats if they weren't careful.

In hopes to make the fishery more safe and profitable, the North Pacific Fisheries Management Council (NPFMC) adopted a plan that

had already been used in Australia and New Zealand in the 1970's that not only kept a steady stream of fish coming to market, but allowed for more growth of that supply by fishing only a percentage of it.

This percentage that could be fished was again cut up into portions like a pie: Commercial, Sports, Subsistence and even Communities got a piece based on how much they had fished years before. So it wasn't like they put on a blindfold and threw a dart at a board. Most small commercial fishermen, like me were given a very small amount of pounds to fish each year.

In order for me to get more pounds to fish each year I either had to cross my fingers and hope the supply got bigger or I had to buy existing shares from other fishermen that were selling the pounds given to them. Those shares aren't cheap. Add in the cost of fuel, boat insurance and dock prices so low we barely made ends meet. If there is someone getting rich please point them out to me.

Now here is where we get into Charter Captain/Guide/Lodge owner concerns. Remember me saying that each of us got a slice of pie? And that these numbers have hardly changed? In a way that is true **BUT** it's not. Now while the **number of pounds** hasn't changed, the **number of Charter Boat Captains/Guides/Lodge Owners have.**

I pulled out a yellow pages book from 1998 and 2005. Counting the number of guides that advertised then and now the number went from 39 to 75! So that makes twice as many people competing for the same unchanged piece. That's one hell of a growth spurt.

A couple of years ago the IHPC came out with a plan that would make the Charter Boat/Guide/Lodge slice into their very own pie. As a matter of fact it would have held more pounds than the original slice. In effect they would have their very own system like the commercial fisherman had. **They didn't want it.**

Why?

Because **A LOT** of the people wouldn't qualify. They had only maybe

1 - 3 years of experience and no way of proving how much business they generated to get a fair and equal share. In other words they had no records. They were never expected to keep records.

I guess you could say they have become victims of their own success. The IHPC had to do something to limit the amount of Halibut that the growing number of Charter Boat Operators/Guides/Lodges were taking from the main supply or we would once again fish the Halibut down. I personally don't think asking them to police themselves is asking too much

I would go farther and make them document every fish they bring back to land. I also wouldn't mind having them pay \$2000.00 in various fish licenses , and have proof of vessel insurance.

But wait that's not all! They can also pay the 3% tax, like I do to the NOAA for every pound they bring back. **AND that doesn't count** local community taxes based on the pounds crossing the dock. Some of those communities could really use the money the Charter Boat Operators/Guides/Lodges aren't paying them. I am feeling generous and wouldn't make them pay for an observer to go out and make sure they are being compliant like we have to.

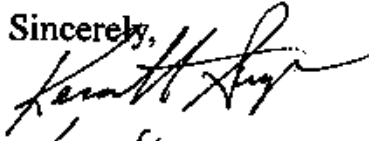
Or maybe they could try to police themselves to stay within the bounds of a resource they get for free.

I ask you. Does it seem fair to you that we ask the Commercial fisherman to give up the pounds that we have **paid for** out of our own pockets? Perhaps they see the portion we earned as their personal eminent domain.

Are we looking for a buyout, like the banks. How are we going to keep this very important resource under control? If this continues it would be no different from what we see happening on Wall Street today. Except there is no big Fish Bank to come bail them, out. To stop over capitalization they have to stop the charter fleet to save the resource. The charter fleet is destined for over capitalization. We need a limiting system to police the charter boats from over harvest of their fixed GHL. If you don't believe me look at SE Alaska, That was

done by Charter boats and guides, not commercial fisherman.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth Simpson".

Kenneth
Joseph Simpson
F/V Lady Simpson

North Pacific Fisheries Management Council (NPFMC)

Roland R Maw
Box 64
Kasilof, AK 99610

Halibut Issues

- 1 When the NPFMC formed the Halibut working group some 2.5 years ago there were specific terms of reference and outcomes expected that would be presented to council.
- 2 Individuals were selected to be on the working group based on:
 - a. halibut biology/ecology
 - b. specific sector knowledge
 - c. representation of sector positions
 - d. mediation/negotiating skills
- 3 Individuals represented themselves as having the above referenced skills/knowledge and were selected to be on the task force.
- 4 For over two years, involving hundreds of hours of work and pages of proposals they examined a huge range of options and potential solutions.
- 5 The halibut working group presented to NPFMC its work product. Note all parties were in support of the recommendations and management options. There was no minority report concerning process or content.
- 6 NPFMC accepted the working group report as complete and as meeting its original intent in forming the working group.
- 7 NPFMC is now in a clear position to take action on the working group report

Please take action

Failure to take action raises the following issues:

- 1 Legal and credibility questions as to why the working group was created by NPFMC. All user groups had legally backed expectations that NPFMC was acting in good faith.
- 2 Either NPFMC created the working group in order to identify a range of management options upon which you could take further action or NPFMC was being deceptive and was operating in bad faith.
- 3 Charter Remorse- To come forward now with a new proposal at this meeting is either demonstrating the incompetence of their working group members, that they never meet the original criteria for membership on the working group or were acting in bad faith for the past several years.

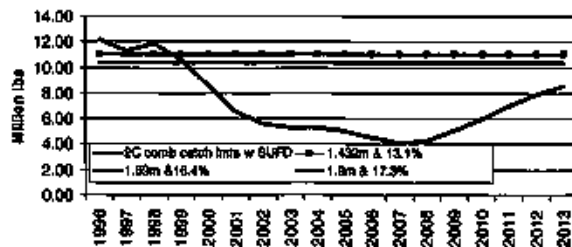
PLEASE TAKE ACTION AT THIS MEETING

50/50 Options

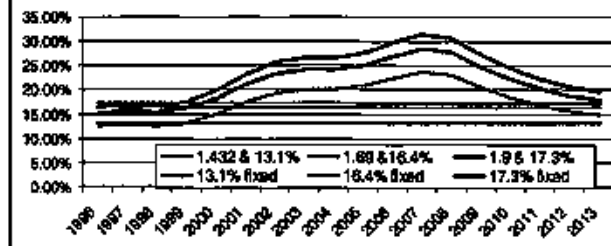
- > Developed to provide a measure of stability to the charter sector during low abundance years, while allowing the commercial fleet greater access during years of high abundance.
- > Breakeven point is where 50% of the allocation percentage applied to the combined catch limit is equal to 50% fixed amount.

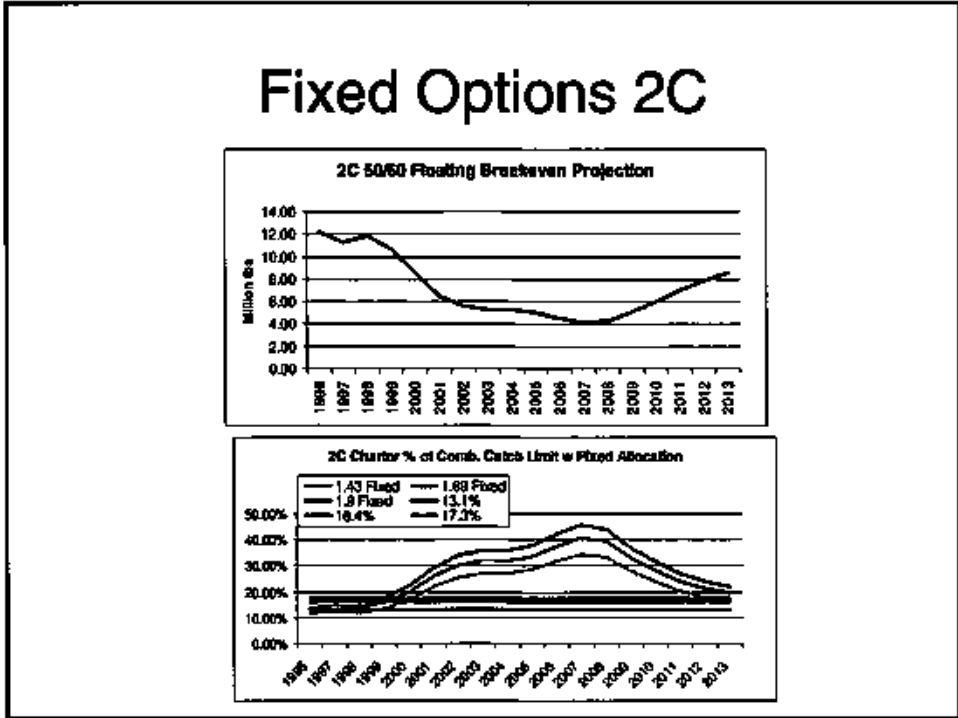
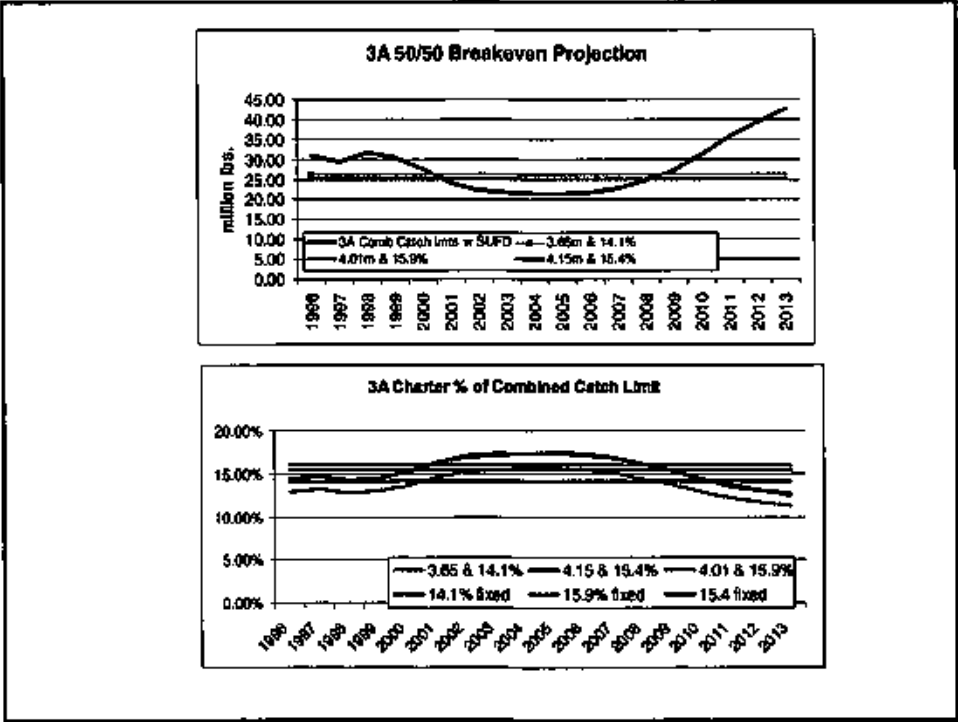
Area 2C		Area 3A	
50/50 option	Breakeven	50/50 option	Breakeven
1.432 mlbs. & 13.1%	11.0 mlbs.	3.65 mlbs. & 14.1%	25.7 mlbs.
1.69 mlbs. & 16.4%	10.4 mlbs.	4.01 mlbs. & 15.9%	25.1 mlbs.
1.9 mlbs. & 17.3%	11.0 mlbs.	4.15 mlbs. & 15.4%	26.1 mlbs.

2C 50/50 Floating Breakeven Projection

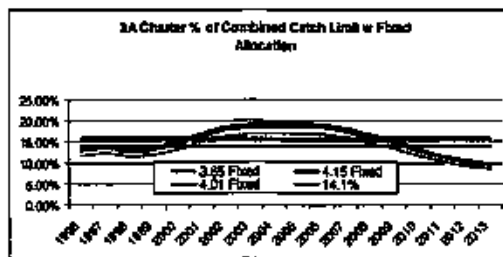
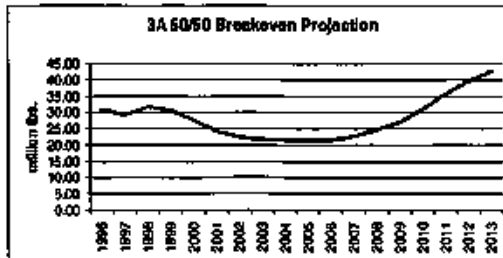


2C Charter % of Combined Catch Limit





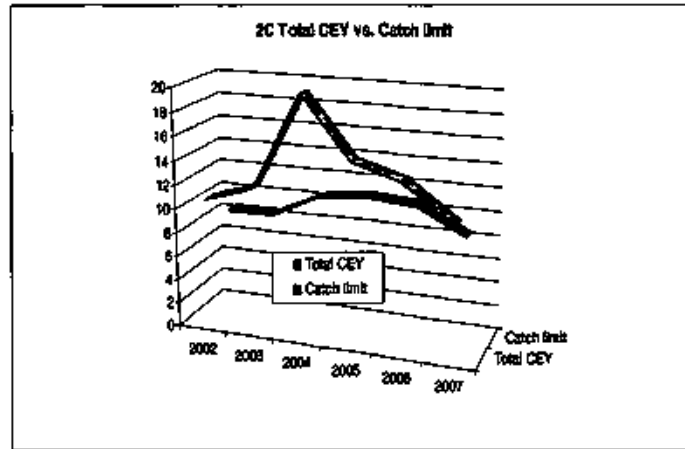
Fixed Options 3A



Problems Using Total CEY as Triggers

- Uncertainty in model estimates due to recent data or new approaches.
- Highly volatile, large fluctuations from year to year
- Results in asymmetric increases/decreases across sectors

2c Total CEY vs. Catch limit



"If a sector does not have timely in-season fisheries data, or has a history of annual overages, then a Council should establish a large enough difference between a sector's annual catch target and annual catch limit to improve the probability that the sector annual catch limit and the stock's annual catch limit are not exceeded"

73 Fed. Reg. 32535

From: NMFS proposed rule revising National Standard 1 guidelines

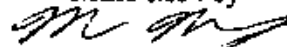
To NPFMC members,

I have been a commercial halibut fisherman since my arrival to Alaska in 1991. After being "culled out" of a crewmembers job I started my own fishing charter business in 1995. I was one of many displaced crewmembers who sought employment in other fisheries and industries. Finally in 2004 I was financially able to purchase my first small block of Halibut quota. I anticipated that to be the beginning of my return to the commercial fishery. Unfortunately the rising cost of quota and the decreased TAC has hamstrung me in that endeavor. As a charter boat captain I am unable to rely on the uncertainty of the current management to forge ahead in either direction.

I have to say that the current bag limit in area 2c has not diminished my charter income. That has been affected more by the rising fuel costs and nationwide financial crisis. A hard allocation between the charter and commercial sector would enable me and others to make more sound decisions during these unstable times. The charter industry should be accountable for overages and the conservation of our precious resource. As a commercial fisherman I have had to bear the burden of the uncontrolled growth and success of the charter industry. As a charter captain I have had the luxury of operating with no accountability for overages. The option of leasing quota from the commercial sector for in-season overages and implementing a limited entry system in the halibut charter industry is a good start. Having these tools in the toolbox would help bring stability and fairness to both industries. The preservation of a century old industry and the future of a new one depend on your action now.

Sincerely,

Mike McVey



Commercial halibut fisherman

And

Charter boat owner

NOTE: MIKE McVey is from
GUSTAVUS, ALASKA

Jim WAREKOWSKI

Hi Kathy,

I apologize for being slow to respond to your email. I've just returned from travel. I have not read through the HCTF paper, but I did take a look at the statement on page 2. I've attached the papers that probably served as the background for the statements. The papers were not intended to serve as a specific review of an optimal allocation of halibut in Alaska. They were intended to demonstrate the kind of information that would be required if there were an attempt to determine an optimal allocation and to show the impracticality of trying to do the analyses needed to determine an optimal allocation. The papers are intended to make the point that a market-based transferable system is the only practical way to approach an optimal allocation over time as costs, prices, and demand for recreation services change. It should be remarked that the papers use a description of the commercial sector published in 1994 --- the pre-IFQ fishery. The description of the sport sector (self-guided and charter) is based on studies of lower Cook Inlet published in 2003. Neither are characteristic of the current longline or charter sectors. The use of those old studies in the attached papers was intended to be illustrative of the types of tradeoffs involved in determining the incremental net benefits of commercial and sportfishing. As to the "optimal" solution, that depends on the goals of society and on the standing level of biomass.

Keith Criddle

email rec'd 9/30/08

Southeast Alaska Fishermen's Alliance

Submitted 10/3/08

9/27/08 Concerned Fisherman

My name is Scott Seales. I am 47 years old married with a family and worried about our future. Having been a commercial halibut for 25 years. I have seen my opportunities in Washington State stripped from me for a quarter century.

Approximately 8 years ago I purchased 8,800 lbs of 2c Halibut quota. I qualified and was granted the opportunity for a loan through NFMS. I researched the prospect, and decided to make the purchase. Fishing my investment I was able to make my payments and a marginal profit.

With the realization of the (TAC) I was aware of the quotas fluctuation up and down. Recently I accepted a 43% quota reduction to conserve halibut stocks. When I entered into my contract / investment (for my family's future), I was unaware that a few years later, I could be in jeopardy, of losing a percentage of my investment. To the charter industry, Not only losing close to half my (TAC) it seems the Charter Association would like me to Give it Away making no investment

themselves as I had to do. Who
kind of qualifications and background
did they have to establish, for me to
give away my lifetime investment?

Realizing I am not the only
family in this situation it concerns
me greatly! The sobering truth is
that I will be left with approx-
imately less than half my initial
(TAC), and still have to make pay-
ments on my initial 8,800 lbs of
quota. This concerns me greatly
and is very troubling to me!

By reading this letter I hope you
can get a understanding of my sit-
uation and frustration!

I am urging the council to
allow the charter sector to invest
in the halibut resource as I have
done or by leasing a limited am-
ount of quota shares.

I do not feel I should have to
give away my quota shares to the
charter sector.

Sincerely

Scott Wheeler, VQA

Scott Wheeler

I would also like to address minimum size limit, which should be the same as the commercial longline fishery.

The Charter size limit practice is not benefiting the overall health of the fishery. Really think about it! No size limit!

I do not recall how many times I have seen charter boat clients cleaning ping pong paddle size halibut, that couldn't have been much more than 18".

Scott A. Scoles



Southeast Fishery Bulletin

National Marine Fisheries Service, Southeast Regional Office, 263 13th Avenue South, St. Petersburg, Florida 33701

FOR INFORMATION CONTACT:
727/824-5305, FAX 727/824-5308

March 25, 2008
FB08-017

EARLY CLOSURE OF THE RED SNAPPER RECREATIONAL FISHERY IN THE GULF OF MEXICO

New Regulatory Action:

NOAA's National Marine Fisheries Service (NOAA Fisheries Service) announces the recreational fishery for red snapper in federal waters of the Gulf of Mexico will close effective 12:01 a.m. local time August 5, 2008, through December 31, 2008, the end of the current fishing year. The recreational fishery in federal waters will reopen on June 1, 2009, the beginning of the 2009 federal recreational fishing season. NOAA Fisheries Service has determined this action is necessary to prevent overfishing and to keep the recreational fishery from exceeding its quota during the 2008 fishing year.

Closure of the recreational red snapper fishery in federal waters complies with regulations implemented under the Fishery Management Plan for Reef Fish Resources of the Gulf of Mexico (Reef Fish FMP), and in accordance with requirements specified in the Magnuson-Stevens Fishery Conservation and Management Act. NOAA Fisheries Service is required to close a fishery or fishery sector in federal waters when the quota is met or projected to be met.

Background:

Constraining harvest to the quota is crucial to meeting the legal requirements to prevent and end overfishing and rebuild the red snapper resource of the Gulf of Mexico. A Court ruling in 2007 required NOAA Fisheries Service and the Gulf of Mexico Fishery Management Council (Council) to revise the red snapper rebuilding plan with a goal of having a 50-percent probability, or greater, of ending overfishing for red snapper between 2009 and 2010 and rebuilding the stock by 2032.

Subsequently, NOAA Fisheries Service implemented temporary regulations in 2007 for federal waters to reduce harvest and fishing mortality for red snapper. These regulations included a recreational quota of 3.185 million pounds (MP) and a commercial quota of 3.315 MP. The recreational bag limit was reduced to two fish,

with a zero-fish bag limit for captains or crews of for-hire vessels. The minimum size limit for the recreational fishery remained at 16 inches total length (TL) and the federal fishing season remained April 21 through October 31. These harvesting restrictions were intended to constrain the recreational fishery to the quota for the fishing year. However, Texas kept its state waters open year-round and anglers were allowed a daily bag limit of four fish. Similarly, Florida maintained a fishing season of April 15 through October 31 during 2007 in its state waters, and a four-fish recreational bag limit. These incompatible regulations in state waters contributed to a recreational harvest that exceeded the recreational red snapper quota by approximately 1.0 MP in 2007. The commercial fishery landed 3.22 MP, or 97 percent of the 2007 commercial quota.

2008 Regulations:

In January 2008, NOAA Fisheries Service published a final rule implementing actions in the Council's joint Amendment 27 to the Reef Fish FMP and Amendment 14 to the Fishery Management Plan for the Shrimp Fishery of the Gulf of Mexico. These regulations further reduced the 2008 recreational quota for red snapper to 2.45 MP, and the commercial quota to 2.55 MP. To keep the recreational fishery's harvest within the quota, the recreational red snapper fishing season in federal waters was reduced to June 1 through September 30. No changes were made to the established bag limits and minimum size limits.

To ensure the 2008 recreational red snapper quota would not be exceeded during the fishing year, NOAA Fisheries Service and the Council requested the five Gulf of Mexico states adopt compatible regulations for 2008. Louisiana and Mississippi implemented regulations compatible with federal regulations, and Alabama is undecided. Florida implemented a two-fish bag limit, compatible with federal regulations, but maintained its recreational fishing season of April 15 through October 31; 78 days longer than the federal fishing season.

Texas maintained its existing year-round fishing season and a four-fish bag limit in state waters, thus not complying with federal regulations.

Analysis Summary:

The June 1 through September 30 federal recreational fishing season was based on the assumption of compatible recreational red snapper regulations in state waters. NOAA Fisheries Service's analyses indicate the longer fishing seasons and less restrictive bag limits in state waters will result in a recreational quota overage for the 2008 fishing year.

Substantial quantities of red snapper are harvested by the recreational fishery from state waters. For example, reported recreational red snapper landings from state waters off the west coast of Florida in 2007 represented more than 25 percent of the total Gulf of Mexico recreational red snapper landings, and more than 50 percent of the total reported recreational landings of red snapper for the state. Similarly, landings from Texas state waters constitute more than 30 percent of the state's total recreational red snapper landings.

With this concern in mind, NOAA Fisheries Service conducted an analysis to project 2008 red snapper recreational landings in accordance with the established federal and state recreational fishing seasons and harvesting restrictions. Recent and historical landings were used to project both landings and season length for

each state by recreational sector (charter, private, and headboat). Where necessary, landings were adjusted for changes in regulations (e.g., lower bag limit, shorter season length). The full analytical report can be found on the Southeast Regional Office Web site: <http://www.sero.nfms.noaa.gov>. In summary, NOAA Fisheries Service projects the recreational red snapper landings for January 1 through December 31, 2008, will be approximately 2.78 MP; a 13.5-percent overage in the 2008 recreational quota.

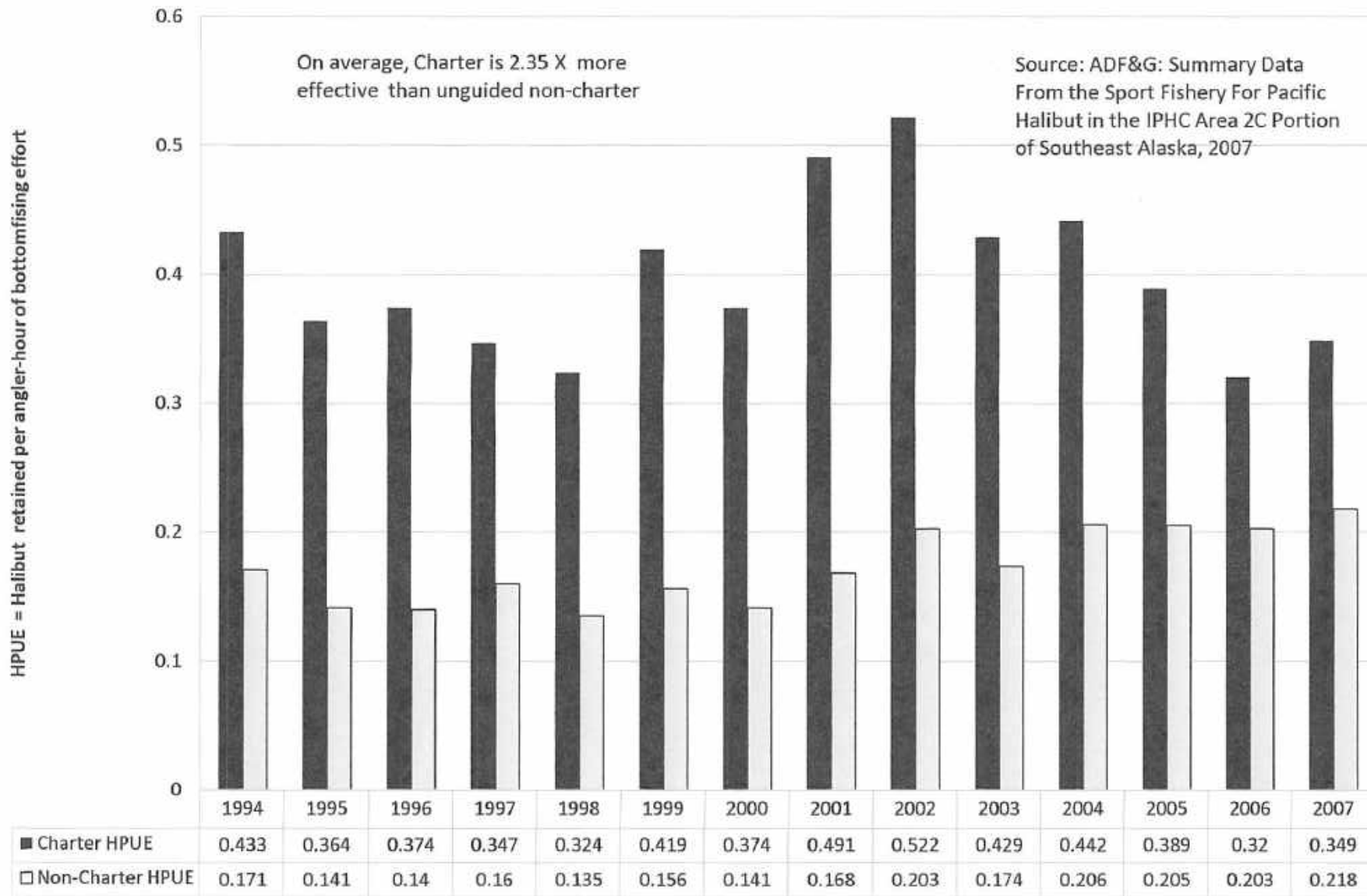
✓ These projections likely represent an underestimate of the landings because they do not account for shifts in fishing effort or non-compliance that are likely to occur as a result of incompatible state and federal regulations. NOAA Fisheries Service is increasingly concerned there will be substantial overages, and a concomitant failure to maintain the established rebuilding targets. Quota overages severely impact the ability of NOAA Fisheries Service and the Council to attain required reductions in fishing mortality and comply with the legal requirements to end overfishing of red snapper.

NOAA Fisheries Service estimates there is a 75-percent probability the 2.45 MP recreational quota will not be exceeded during the 2008 fishing year if the federal fishery is closed on August 5, 2008. NOAA Fisheries Service believes the timing of the closure is necessary to adequately account for anticipated but unquantifiable shifts in effort into state waters once the federal fishery closes.

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Area 2-C: Charter HPUE vs Non-Charter HPUE, 1994 -2007. Average of Sitka, Juneau, Ketchikan, and Craig HPUEs



September 30, 2008

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

Dear Mr. Chairman and Members of the Council,

The Charter Halibut issue is not going to go away. As the industry continues to grow unabated, the time is now for the council to act. Like others before, the time has come for the charter industry to swallow a hard pill. The commercial setline fleet bit off their sour pill in 1994 during the enactment of the IFQ program. To this day critics still complain about the IFQ program; however, with modest changes, the program has worked nearly flawlessly for users while protecting the resource itself. As panel members, you have a responsibility to ensure the sustainability of the halibut resource. Today, the halibut resource is not sustainable.

If we fail to enact Alternative 2, the charter fleet will chew through the entire setline harvest GHL in five years or less. Once disposed, the biomass will be next. If you do not act during the October meeting, then when will you act? The council has been wrangling with this issue for well over 15 years. Waiting, delaying, re-planning and analyzing any new alternative only continues to threaten the resource and ultimately will destroy the business the charter industry hopes to protect.

Lastly, if you fail to act, you jeopardize my business, the business of the state and the processing industry in SE Alaska. I have outstanding loans in excess of \$200 thousand on Halibut IFQs that must be paid regardless of whether you defacto the setline halibut GHL to the charter industry. The State of Alaska has loaned money 154 times to Alaskan residents to buy Halibut IFQs totaling over \$16,147,420. Who will pay those loans if you fail to act before 2009? Alaska Pacific, Wells Fargo, CFAB and other banking institutions, likely have outstanding loans totaling \$60-\$100 million in IFQ loans.

In 2005, a Juneau based processor, processed \$1.8 million pounds of halibut. After three years of defacto re-allocation to the charter fleet, the same processor will be lucky to process a million pounds in 2008. This lost processing opportunity is equally felt by all processors in SE Alaska. Due to re-allocation of the halibut resource to the charter industry, the same processor didn't hire 7-10 full time employees. If further reductions occur and the company falls below the half million mark, the company may have to shut down altogether. Halibut provides the foundation for many processors to operate and buy other types of fish. Without that one plant, local fishermen will lose salmon markets, crab markets and 75 employees of the processor will be put on the streets looking for work. The Juneau-Auke Bay based processor is just one processor among many in Southeast; imagine the domino effect in all of SE Alaska, if the defacto re-allocation of the halibut resource continues.

I urge you to adopt Alternative 2 as approved by the AP Panel during this October meeting. Any further ruminations or ideas should be seen as delay tactics meant to kill the setline fleet. After

15 years of political manipulation by the charter fleet, I can only surmise their purpose is too destroy my business and all other businesses that rely on the commercial setline fishery. For the sake of the fishery, the people and the halibut resource, please enact Alternative 2. In the long-term, charter fisherman will be glad you created not only a healthy sustainable resource but the framework for a healthy sustainable charter business in which to rely upon.

Respectfully,

Chris Knight
623 10th Street
Juneau, AK 99801

Bob ALVERSON

Council members:

RE: Area 3A and 2C final action on allocations between charter and commercial halibut catches

The members of the Fishing Vessel Owners Association support the Advisory Panel's recommendation to the Council. The option includes Element 1, option a, which would allocate 13.1 percent of the halibut in area 2C to the charter interest and 14 percent to the charter interest in area 3A. The option also request that the delayed time loop for implementing restrictions on the charter interest be dropped in favor of prospective management based on the best information available. For the economic stability of both sectors there needs to be an allocation of the recourse to each sector with separate accountability to stay within the approved allocation limits. The new charter option fails to provide separate accountability and does not allocate to the different sectors and will undermine the ability to put together meaningful proposals for financing.

We have reviewed the new charter recommendation and here is some of its affects on commercial fishermen and quota share holders in area 3A. Example follows:

The 2008 commercial TAC was set at 25,000,000 pounds
The most recent charter harvest is about 4,000,000 pounds based on the 2007 season.

If the total harvest by charter and commercial allowed by IPHC were to be 29,000,000 pounds, which is very close to status quo, a B30 harvest rate would kick in at about two thirds of where we are at this time for area 3A. (Verbal from IPHC) This would be a total harvest level at 19,000,000 lbs. for both sectors. If during the reduction to get down to this number the charter interest had not increased their catch and it stayed at 4 million pounds the commercial interest would get 15,000,000 pounds in area 3A. This means the commercial interest is being asked to practice conservation for the first 10 million pounds of reduction before the character interest reduce to a one fish bag limit. If it takes 10 years to reach this point, and the average commercial reduction in harvest are 5,000,000 below today's harvest this means the commercial interest would have given up 50 million pounds at 4 dollars a pound in the name of conservation before the charter interest had a one fish bag limit. This is not fair and equitable.

This is actually a best case example for the commercial interest as this example presumes that the IPHC would not recommend a steeper cut in harvest rates to correct from a B30 situation. Of course if that was the case no reduction in charter harvest would take place unless the recourse was at B30. Additionally, if 3A was proportionately in a more difficult condition than the regulatory areas to the west, area 3B and areas 4, the character option would not require cuts on themselves unless the coast wide recourse was at or below b30. In both these two situations the commercial harvest would be less than 15,000,000lb.

The current charter option fails to meet the problem statement of the council on the continued reallocation from the commercial sector, it places an unfair burden for conservation on the commercial sector, and it destroys the economics of financing commercial QS and over time results in a huge reallocation of the recourse.

Good afternoon gentlemen. My name is Frank Wright, Jr., president of Hoonah Indian Association, a federally recognized Tribe. I am from the Tlingit village of Hoonah, Alaska in Port Fredrick, I am here to represent our people.

I am from a culture that believes in taking only what is needed. Icy Straits used to be a hot place to fish halibut. Our People would only have to go a couple of miles to get a fish. Nowadays, we don't get too much dried halibut, because of lack of fish.

Hoonah people are traditionally a fishing people and we pretty much depend on the waters for our cultural existence. Whenever any component of our identity is taken away, like a loss of fishing opportunity would be, it diminishes our existence as a Tribe.

And we are concerned about the halibut, which are a big part of my people. It is getting pretty hard to catch a halibut. My people are a subsistence gathering people. We are getting to the point of being regulated right out of existence.

I have been a fisherman for approximately 45 ½ years. I started out fishing with me dad in Glacier Bay, next door to Icy Straits. But because of the pressure of a lot of boards, we moved out. Now because of federal law, I can't fish in the Bay, which is the ancestral homeland of the Hoonah people. I did not fish the qualifying four years to get a lifetime permit. And yet, charter boats can go into the Bay and commercial fish.

When fishing was open during the qualifying years of IFQ's, it was called a "derby". We had to go out during the opening no matter what the weather. I call the opening of sablefish April Fools Day. It always opens on April 1st. Sometimes it got pretty scary out there. I feel like we earned our quota. Now we have charter boats dipping into our allowable catch. So where is the fairness here?

We pay a percentage for keeping the fisheries alive and well managed. What do the charter boats pay?

If I go over my quota, I get penalized three times. We don't intentionally go over; sometimes it just happens despite our best efforts. We get fined for going over our quota; our catch is taken away; and we lose a portion of next year's catch. And, we pay fish tax. So who pays when the charter fleet goes over?

Why is it that fish science does not pertain to the charter fishing industry? I did not jump up and down when my quota was cut 43%. I knew it was necessary. Is the charter fleet going to keep on going to court when the resource is in trouble? Are we going to be like the East Coast cod fishery --- no fish?

As I watch charter fishermen bringing in ping-pong paddles, it just doesn't seem right. I would have law enforcement on my board for bringing in a 31 inch

halibut. I was told that it was okay for charters, because small halibut are not spawners. Well, how do they become spawners? They have to grow.

Who is going to be accused of mismanagement when there isn't anything left to catch?

My crew are local fishermen from Hoonah and rural living is pretty expensive.

I have tried to list some of our major concerns about the halibut fishery. We feel that it may be depleted if we don't do something about charter boats – a growing industry that is out of control, with lack of enforcement.

My people thank you for listening and I thank you.

Frank Wright, Jr., President
Hoonah Indian Association

10/2/08

Mr Chairman, members of the Council.

My name is Bryan Bondioli. I am representing the Ak. Charter Association. Ladies and gentlemen, none of the options on the table are "fair and equitable" to all users and WILL.....cause significant economic damage to the charter operator and the communities that depend on them.

The current suite of alternatives does not even provide for the basic needs of the potentially qualified Moratorium fleet. None of the options on the table can achieve the Council's stated goals of charter sector stability, predictability, diversity, and economic viability. The proposed set of options are based on legally unfounded "GHL Policy". They are not intended to provide a "fair and equitable" allocation as required under the Halibut Act but are instead intended to create an unlawful compensation scheme.

The Council analyses have said many times that harvest by the charter sector does Not affect the halibut resource in a measurable way. NMFS has clearly stated, just recently in court, that there is quote "No Concern" with respect to the conservation of the resource. In addition, table 11 of the GHL analysis, shows longline removals have exceeded the Commercial quota in all but one of the past five years, by as much as ½ million pounds, nearly one tenth the statewide charter harvest. Last year, 2C longliners were allowed to harvest 2.3 Million pounds OVER their CEY. Sublegal wastage has increased by 50%, Sublegal bycatch mortality has increased by 24%, and yet; neither the Council nor the IPHC have expressed any concern, much less a call for conservation. Furthermore, the Council analyses indicate that the CEY is projected to increase in 2C and 3A by nearly 20 million pounds in the next 5 years.

All current allocation options are based on The Sole foundation of the GHL "problem statement" which says, the increase in charter harvest would #1) reduce the available commercial quota shares and #2) therefore reduce the economic value to the longline sector.

The Council analyses state that the resource is "quote" very robust. The fishery CEY, is projected to increase by nearly 20 million pounds for areas 2C and 3A in the next five years. Commercial QS has increased overall. Area 3A has increased by over 3.5 million pounds since 2003. Page 9 of the GHL... analysis, CLEARLY states that reduction in 2008 commercial harvest was quote "due to a different production model and a lower "harvest rate"; assessed by the IPHC"NOT the minimal growth of the charter sector.

The McDowell Group study provided to you by the Halibut Coalition provides a table on page 10 which lists the ex-vessel prices from '96-'05. The analysis states: " (A price shock hit the industry in 1998, perhaps partially due to a 49% increase in the pacific halibut quota over a two-year period. Another significant price decline occurred in late 2001 and early 2002, following the Sept. 11, attacks.) The analysis definitively shows that the first drop in quota value was due to the additional "gifting" of the public resource, free of charge to the longline sector. The 2nd price hit was the result of a MAJOR worldwide terrorist threat. Clearly, neither of these effects were caused, by ANY growth of the charters.

Let's look at the Actual losses to the longline sector, as verified on the NOAA website.

1. Since 1995, the longline sector has had an average annual harvest of over 58 million pounds, including a 100% "FREE" increase in "gifted" Shares between '97 and '99.
2. Individual quota share values have increased by 300% in 2C and 340% in 3A, and up to 444% statewide.
3. Ex-vessel prices have increased by over 200%, statewide.
4. Area 2C longliners are currently receiving 39% MORE profit for 35% LESS effort.
5. The charter client has NEVER harvested more than 6 million pounds Statewide.

A simple evaluation of the reports, analyses, and the actual historical data demonstrate, without question, that the GHL "policy" is unfounded and legally unsupportable. The growth of the charter sector has had Zero effect, much less a negative impact,..... to either the amount available commercial quota shares or commercial economic values.

The Council has a legal responsibility to evaluate alternative proposals which would be much less economically damaging and yet, actually achieve the Council's stated goals. In the clear absence of a biological "need", the ACA requests that the Council postpone action until April and add the CHTF proposal as an option for consideration. The alternative proposal:

1. ... ensures compliance with the Halibut Act and presents a "fair and equitable" alternative to damaging options currently under consideration.
2. It offers true conservation solutions, for the benefit of halibut resource, and not just the longline sector, in the event of a true conservation crisis.
3. It simplifies enforcement and will eliminate in excess of three quarters of a million dollars (per area)/ year in additional enforcement costs,

It eliminates extensive Council involvement; All current proposals require Council attention at nearly every meeting,forever

Taft Perry

handout for 10/3/2008 testimony

Tracking of Taft Perry & Dan Miner's Area 2C halibut investment

12/2006 investment	6,600 shares x \$ 18.50 per share	\$ 120,000.00
	gear, equipment, vessel modifications	<u>\$ 20,000.00</u>
		\$ 140,000.00
1/2009 value	3,600 shares - 12.5%*(3600) = 3,150 shares	
	3,150 shares x \$ 23.00 per share	\$ 72,450.00
	recoupable portion of above \$20,000 - estimated	<u>\$ 5,000.00</u>
		\$ 77,450.00
	net loss in 25 months	\$ (62,550.00)
	percentage of investment lost	45%



Alaska Outdoor Council

PO Box 73902
Fairbanks, AK 99707-3902
(907) 455-4AOC (4262)
aoc@alaska.net
www.alaskaoutdoorcouncil.org

September 24, 2008

Mr. Eric Olson
Chairman
North Pacific Fishery Management Council
605 West Fourth Avenue, Suite 306
Anchorage, Alaska 99501

Dear Chairman Olson:

Thank you for the opportunity to provide public comment to the North Pacific Fishery Management Council (Council) regarding options to allocate halibut for individual use. The Alaska Outdoor Council (AOC) is a statewide conservation organization that advocates for continued regulated harvest of Alaska's renewable wildfood resources. AOC has participated in the regulatory process of fish and game management and allocation since the mid-50's. AOC represents 48 member outdoor clubs and 3,000 individual members for a combined membership of near 10,000 Alaskans.

For thousands of Alaskans charter boats are the only way to access halibut. Well over a third of AOC membership reside in interior regions of Alaska and are dependent on the Alaska Charter industry to provide safe, efficient access to coastal halibut resources for personal consumption for themselves their families and neighbors. With today's high fuel costs the ability for Alaskans to secure a significant poundage of halibut per trip to coastal ports is imperative.

Proposed Council options of one halibut limits for Alaskans fishing with licensed halibut charters would reduce their ability to provide an important wildfood resource that many Alaskans have depended on for generations. The additional cost in fuel and time could make their annual trips to coastal areas to harvest halibut cost prohibitive. Worse yet it could create an ever expanding safety problem as more Alaskans, and non-residents, would choose to fish for halibut in Alaska's costal waters on private, or rented, boats in order to continue taking two halibut under private recreational harvest regulations.

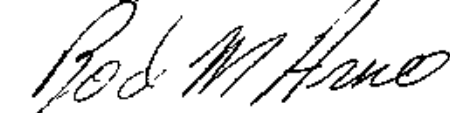
"Protecting your hunting, trapping, and fishing rights since 1955"

The Alaska Outdoor Council's first concern and main purpose is "to perpetuate the natural resource base upon which member group activities depend". The majority of individual halibut harvest in 2C and 3A takes place within day trip distance from coastal communities. With that in mind AOC would recommend that the Council work with the State of Alaska to create Local Area Management Plans (LAMP) in near shore waters whenever biological concerns for local halibut populations occur. Assuring that halibut resources are managed in a Fair and Equitable manner is mandated in the Halibut Act of 1982. Individual harvest of halibut, accounting for less than 10 percent of the annual harvest, should have a priority over commercial harvests in near shore waters traditionally used by both subsistence and recreational users. These areas make up a small portion of the known halibut areas off Alaska's shoreline.

AOC would oppose any Council option that would include a buy back of halibut allocations from commercial users. Halibut are a public resource, as such allocations should not be bought or sold to any special interest users.

Again, thank you for the opportunity to provide written testimony to the Council regarding options for individuals to continue harvesting halibut for their family and neighbors in Alaskan waters. Absent a clear biological mandate that the recreational halibut harvest alone is responsible for causing damage to halibut stocks AOC would strongly recommend that the Council would provide management options that would not reduce the current two halibut limits in 2C and 3A.

Sincerely,



Rod Arno

Executive Director

Cc:

The Honorable Sarah Palin, Governor of Alaska
Denby Lloyd, Alaska Commissioner of Fish and Game

Greg Inderland

**YAKUTAT SEAFOODS ECONOMIC ACTIVITY GENERATED BY 1.2 MILLIONS POUNDS
OF HALIBUT PURCHASED IN 2008**

WAGES PAID TO EMPLOYEES \$156K

FISH TAX PAID TO THE STATE OF ALASKA 180K

AIR FREIGHT PAID TO ALASKA AIRLINES \$772K

MARINE FREIGHT PAID TO ALASKA MARINE LINES \$63K

PACKAGING FOR THE HALIBUT \$108k

OVERHEAD COST FOR YAKUTAT SEAFOODS \$361K

PURCHASE OF THE HALIBUT FROM LONGLINERS \$4.7 MILLION

**TOTAL ECONOMIC ACTIVITY GENERATED BY PURCHASING AND PROCESSING 1.2 MILLION OF HALIBUT
\$6.34 MILLION DOLLARS**

**Greg Sutter
Captain Greg's Charters
PO Box 2202
Homer, Alaska 99603
(907) 235-4756**

October 01, 2008

Re: Agenda Item C1(b)

Dear Mr. Olson and Members of the Council,

I support the Charter Halibut Task Force's, "Charter Sector Alternative Proposal." I urge this Council to instruct its staff to begin analysis of the Charter Sector Alternative Proposal for further review and potential action. The most important aspect of this proposal is that all sport-fishing anglers should be treated equally. The current allocation options and the GHIL are discriminatory.

I oppose the leasing provisions in the Halibut Catch Sharing plan. Already the Advisory Panel of this Council has demonstrated, through its recommendations, that an inadequate allocation can be moved forward as long as IFQ leasing is an option to the charter sector. This leasing provision not only complicates administration and enforcement, but also lacks any meaningful economic feasibility information.

The fundamental flaw in all of the current allocation options and any leasing provision is the absence of a comprehensive social-economic study. This Council is proposing actions without needed information about the potential economic ramifications of its decision. Especially in light of soaring fuel costs and the overall health of our national economy, this Council should review relevant economic data before a decision is made. Hundreds of small businesses throughout Alaska are at risk by the set of options this Council is considering. It should at least properly assess potential economic consequences. Small businesses will be hurt enough by downturns in our national economy; we do not need to suffer further by this Council's actions.

Charter fishing has strong ties to the tourism industry. If anglers are looking to catch two halibut and two fish are not available to them in Alaska, they will go to Canada and spend their dollars there, or not come up at all.

Anglers' rights are on the line and so are small businesses throughout Alaska. Before this Council takes final action on the allocation proposals, it should incorporate solid economic data in its decision. Currently, it is lacking and too many small businesses are being put in jeopardy. And provide an adequate allocation to the American public so they have the choice to come up, spend a lot of money and catch two halibut, or stay home and buy it. Do not take away their option to catch fish that belongs to them. Leave the option open for the American public to decide what is best for them.

Sincerely yours,

Greg Sutter

Attachment: Casper Foot Clinic's letter to Governor Sarah Palin

CASPER FOOT CLINIC

John H. Nelson, D.P.M.

1916 EAST FIRST STREET

CASPER, WYOMING 82601

Telephone (307) 266-4415

Governor Sarah Palin
P.O. Box 110001
Juneau, Ak 99811-0001

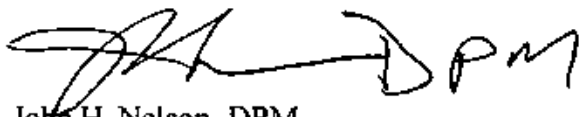
Dear Governor Sarah Palin,

Please except this letter as a support for continued sportfishing in Alaska.

The week of June 11th through June 17th my family and I visited Alaska. My wife and daughter came in on the inland sea passage to Seward. My son and I met them in Anchorage while my wife and daughter toured Alaska and Denali, my son and I fished. We all had a great experience and expected to return in the near future.

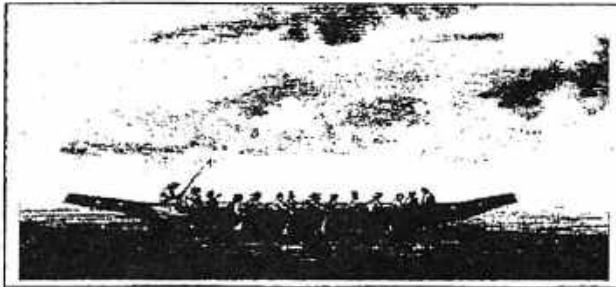
I am having concerns with the proposed change in the halibut limits. It is my understanding that the sportfishing limit will be reduced from two to one. This will have a very negative effect on my thoughts of returning. Charters are expensive and only being able to catch one halibut would probably lead me to investigate in a Canadian trip where the limit will still be two a day. I would rather spend my money in the United States and a return to Alaska would be great.

Sincerely,



John H. Nelson, DPM
1916 E. 1st
Casper, Wy. 82601
307-266-4415

*Submitted by
Jeff Fairbairn*



***Southeast Alaska Subsistence
Regional Advisory Council
Bertrand Adams Sr., Chair***

**P. O. Box 349
Yakutat, AK 99689
907 784 3357
kaadashan@alaska.net**

September 24, 2008

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

The Southeast Alaska Subsistence Regional Advisory Council (Council) was formed under Title VIII of the Alaska National Interest Lands Conservation Act as a forum, in part, for the expression of opinions and recommendations by persons interested in any matter related to the subsistence uses of fish and wildlife within the region. Rural residents of Southeast Alaska (including Yakutat) are dependent on the continued subsistence use of all wildlife resources, including halibut, throughout the Region.

The Council supports the continuation of the subsistence halibut fishery and is concerned with maintaining the availability of the halibut resource near rural communities. **The Council has concerns regarding the growing sport halibut charter fleet in Southeast Alaska and the decline in halibut abundance in the Southeast Alaska area. Many subsistence users have reported that it is becoming much more difficult to catch halibut near communities where they had traditionally harvested in the past.** We encourage the North Pacific Fisheries Management Council to develop a management strategy that will allow the continuation of subsistence uses in areas adjacent to rural communities.

Thank you for considering this concern. Please address any questions with this letter either directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, AK 99833, 1 907-772-5930, robertlarson@fs.fed.us.

Sincerely,

Bertrand Adams Sr.
Bertrand Adams Sr.
SESRAC Chair

Sitka Conservation Society
P.O. Box 6533
Sitka, AK 99835
Ph.: (907) 747-7509
Fax: (907) 747-6105

North Pacific Fishery Management Council
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501
September 22, 2008

Re: Agenda Item C-1: Halibut Catch Sharing Plan

Dear Chairman Olson and Member of the Council:

These comments are submitted on behalf of the Sitka Conservation Society (SCS). SCS is Alaska's oldest conservation society and is a non-profit organization supported by its members and guided by a board of directors. Since 1967, the SCS has worked to protect marine and terrestrial wildlife throughout the Tongass National Forest and its surrounding coastal waters. Its membership includes commercial fishermen, lodge owners, non-Native and Alaska Native subsistence resource users and local recreational fishermen, all of whom have an interest in the conservation of the halibut resource. The Sitka Conservation Society has actively advocated for healthy, sustainable local fishery resources, worked to protect and restore freshwater salmon habitat, participated in marine habitat management processes to ensure that coastal development activities do not jeopardize fishery resources and above all promoted a vision for a sustainable local economy based on responsible, science-based management of our natural resources.

Because of concerns raised by our members pertaining to localized depletions and long-term conservation of the halibut resource, in June of 2008 SCS filed an amicus brief in support the decision by Secretary of Commerce Gutierrez to impose a one-fish bag limit for the Area 2C guided angler fishery. We submit these comments to follow up on the concerns we raised in support of the Secretary's proposed conservation measures.

As explained in more detail below, we respectfully submit that CSP Options 2 and 3 for fixed poundages carry unjustifiably high risks in terms of resource conservation and fail to address the issues of local depletion and the needs of those "who depend on the halibut resource for food." For these reasons, we support either Option 1a or Option 1c because these options provide for a fixed percentage at levels that have lower impacts on local depletion than Options 1b and 1d. Further, we continue to be concerned about the data deficiency for the guided angler fishery and urge the Council to minimize reliance on the delayed feedback loop timeline and instead establish a conservative GHL for the guided angler fishery to ensure that area-wide harvest remains within CEY until accurate and verifiable data collection measures are developed to support in-season, abundance based management.

As an initial matter, we understand that this proposed regulatory amendment addresses a complex, contentious issue: the instability caused by the absence of a hard allocation and the challenging task involved in "balancing the needs of all who depend on the halibut resource for food, sport or livelihood." We appreciate the Council's sincerity and efforts in this regard but respectfully submit that the significance of local sustainability requires

more thorough analysis and a management response that accords due weight to the needs of all resource harvesters for stability.

A major shortcoming of this process is that, in our view, the EA/RIR/IRFA analysis of the proposed regulatory amendment for a Catch Sharing Plan (CSP) did not adequately assess the impacts of CSP options on long-term resource conservation, subsistence and non-guided local recreational use of the halibut resource. The primary focus of the analysis was on allocative impacts to the commercial setline fleet with little recognition of two equally significant problems with the perpetual guided angler fishery harvest GHL exceedances: the fact that the exceedances are a conservation issue and the significant impacts of the exceedances on subsistence and local recreational fishery harvests.

As an initial matter, the EA/RIR/IRFA's brief references to local depletion overlooked the need for a meaningful discussion of local impacts. The EA makes the unsupported assertion that "[c]ontinuation of the status quo is not expected to impose costs ... to self-guided anglers or subsistence harvesters." This is a curious conclusion. The Department of Commerce has recognized throughout this process that the growth of the guided angler fishery has greatly increased competition in subsistence community use areas, overcrowded productive grounds and contributed to declining community use harvests in some areas. But these impacts have always received short shrift under the rationale that local depletion is not a conservation concern in terms of overall abundance. NEPA required higher quality analysis - the local socio-economic effects of the CSP and GHL exceedances that should have also been analyzed are significant and merited further discussion in order to better inform the Council's decision.

We request that you supplement the EA/RIR/IRFA with the information provided below and referenced materials and reconsider the findings pertaining to subsistence and local impacts. We do not wish to further delay the long-awaited resolution of this issue but believe that it is important for the Council's findings to reflect information indicating that both the status quo and the CSP options do and/or will impose costs on local recreational anglers and subsistence harvesters.

In 2003, when NMFS defined the halibut subsistence fishery, the agency recognized that halibut is one of Alaska's most important subsistence food species and that most subsistence fishing occurs in areas that are close to and accessible to the home community. Area 2C provides the largest portion of Alaska's subsistence halibut harvest - nearly 600,000 pounds in 2006. 915 Sitka residents who hold Subsistence Halibut Registration Certificates (SHARCs) fished for halibut in 2006 and harvested 147,526 pounds of halibut. Nearly one out of every four Sitkans is a SHARC holder. Some Sitka SHARC holders also fish recreationally - all total, SHARC holders in Sitka alone harvested 186,404 pounds of halibut in 2006.

The economic value of these harvests to local communities is substantial. One accepted method of quantifying this value is to estimate the replacement cost of a substitute, imported product. Had these Sitkans purchased their fish at a grocery store in Anchorage, the cost would easily have exceeded \$1.5 million at current prices for halibut filets.

Because most subsistence fishermen operate from small skiffs, they cannot safely access halibut far from Sitka and generally fish in near shore waters. The guided angler fishery once used these same waters until the local depletions forced them to purchase larger, faster vessels designed to range further in pursuit of halibut. There is ample circumstantial

evidence to demonstrate local depletions – evidence that the EA/RIR/IFRA neither considered nor analyzed.

For example, subsistence halibut harvests in one key regulatory area near Sitka have decreased 15% since 2003. Similar decreases have occurred in other parts of Southeast Alaska or parts of area 3A where there is a large guided charter presence – near Yakutat, Cook Inlet and in Prince William Sound. Yet during roughly this same time period, guided anglers increased their take from 100,000 fish in 2002 to 160,000 fish in 2005. And there has been a higher catch rate decline for guided angler fisheries over the past five years near the most affected communities in Southeast Alaska – Sitka and Craig (47% and 58%) – than for the commercial setline fishery across the region (33%). This contrast leads to the inescapable conclusion that guided angler fisheries have a disproportionate impact on community use fishing areas.

The anecdotal evidence is equally compelling – several Sitkans filed affidavits seeking to intervene in the recent court decision overturning the one fish bag limit. These residents cited their history of personal use fishing, personal observations of local depletion and attributed the increased difficulty of finding halibut for themselves and in many cases their neighbors to the growth of the guided angler fishery. Similarly, at the Southeast Region Subsistence Advisory Council hearings held in Sitka in February, local subsistence users expressed concern with resource impacts caused by the guided angler fishery.

Stakeholders have repeatedly emphasized these concerns throughout this long process. Commenters on the 2007 proposed rule to modify size and bag limits urged the agency to consider subsistence users and non-guided anglers in the problem statement to account for the local depletion and negative impact on subsistence harvests arising from continued guided angler fishery GHL exceedances. In 2003, resident sport anglers urged GHL implementation not because of concern about the erosion of the setline allocation, but to “control effort” in the guided fishery and “ensure sport fishing opportunities for local residents.” And the Department of Commerce is now considering additional restrictions specifically applicable to subsistence users in Sitka Sound in order to address localized depletion concerns.

Two significant flaws flowed from the cursory review of these significant stakeholder concerns: (1) consideration of CSP options that allocate a fixed poundage or mixed fixed poundage/percentage to guided angler fisheries and (2) continued reliance on delayed corrective management measures to account for the absence of timely and accurate guided angler fishery catch data showing GHL exceedances.

With regard to the first flaw, we reiterate our request that the Council select the CSP option that ties guided angler fisheries explicitly to abundance – a percentage of CEY. There is no other defensible option that would be consistent with sound principles of science-based resource management. As a general rule, we support abundance-based management as a fundamental principle for regulating fisheries of all types.

The need for a fixed percentage option is even more compelling in this case where in-season corrective measures may not be available. Recent International Pacific Halibut Commission research indicates that a dramatic increase in the arrowtooth flounder biomass in the Gulf of Alaska may be the cause of a marked decline in halibut size at age and may continue to have detrimental impacts on halibut populations – impacts that may require a “reevaluation of the harvest rate.” Because the concern of this research pertains to competition for prey species and the relationship between prey availability and size at age, we add that there is

an increasing body of scientific literature identifying concerns with increased ocean acidity and marine prey species. In view of these concerns, a fixed poundage allocation to one sector could foreclose management options in the future that would otherwise be available if harvest was tied to abundance. In sum, we strongly oppose Options 2 and 3 and perceive the concept of a fixed weight harvest of a fluctuating resource as inherently unsustainable. Such an option carries an unjustifiably high risk of creating an "overfishing entitlement." Please adopt a CSP that best allows for management flexibility and provides some protection for local use - Option 1a or 1c.

Second, the recent charter operator lawsuit against Secretary Gutierrez and the decision to enjoin the Secretary's one-fish bag limit conservation measure have substantially undermined the feasibility of post-overage corrective measures. The Council must require improved means of timely and accurate catch reporting that is equivalent in reliability to the system used to monitor commercial setline harvest. The Council recognized in 2002 that better reporting was integral to the success of the GHL proposal. But better reporting mechanisms have not been developed and this failure is inextricably intertwined with the inability to manage the guided angler fishery within its GHL.

In our view, the guided angler fishery and ADF & G need to have the same accountability for accurate reporting of catch data as other harvesters and harvest managers. There is no time lag for calculating subsistence harvests as is necessary to determine CEY and commercial setline fishermen report catch data contemporaneously with delivery. The commercial setline fishery has built-in mechanisms through the IFQ program that cap overages at levels far below guided angler fishery exceedances and correct those overages the following year. It is grossly inequitable to allow the one harvest sector that fails to abide by its limit a free pass based on an alleged infeasibility of catch reporting.

We recognize that the development of improved catch data reporting methods that work best for the guided angler fishery and fishery managers will require time and effort. We think that the mandatory logbook program can be an improvement but only if there is a clear mechanism for verification. We urge the Council to adopt the National Research Council's (NRC) recommendation that guided recreational fisheries need to be managed more like the commercial sector in terms of survey and reporting requirements and encourage ADF & G and the guided angler fishery to develop a program based on the NRC's findings in its 2006 Review of Recreational Fisheries Survey Methods.

Until the industry and managers put forth that time and effort, we request that the Council consider implementing the management response that is most consistent with applicable conservation mandates: the charter allocation must be set conservatively and proactive management implemented in order to minimize the possibility of any future overages. As demonstrated by this year's lawsuit and decision, the policy of delaying corrective measures pending collection of older data carries the high risk that the Council may not be able to respond to fluctuations in the resource and that measures will never be implemented to the long-term detriment of the resource and to the immediate detriment of other stakeholders.

In sum, we request that you (1) adopt either CSP option 1a or 1b; (2) set a conservative allocation for the guided angler fishery and (3) commit to real time catch accounting of charter harvest to protect the resource and to lessen that fishery's disproportionate impact on local recreational and subsistence fisheries.

Thank you for considering our concerns,

Paul Olson
Conservation Director
Sitka Conservation Society
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REFERENCES

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67 Fed. Reg. 3867 - 3871 (January 28, 2002); 68 Fed. Reg. 47260 (August 8, 2003) and 72 Fed. Reg. at 30716 - 30724 (June 4, 2007).

Rhonda Hubbard

Example of GAF Lease by IFQ Holder:				
IFQ lbs to Lease:		1000		
Avrg lbs/Fish per IPHC data:		18		
Number of Fish		56		
Lease Charge based on local Dock Price:				
Avrg Dock Price in Ctrl Gulf:		\$4.75	Dock Price Varies per year/area	
Lease Fee:		50%	Lease Fee may vary per mgmt area	
Lease prc/lb:		\$2.38		
Plus NMFS Mgmt Fee:		3%	NMFS is typically less than 3% max	
Total Lease Cost/lb for GAF: \$2.45				
Total Lease Cost: \$2,446.25				
Total Cost per GAF fish: \$44.03				
GAF cost can be passed on to the consumer				
Lodge Package Costs:				
		<u>3 days</u>	<u>4 days</u>	<u>7 days</u>
Sportsman cove		\$3,295.00	\$ 3,895.00	\$ 6,295.00
Sitka operator		\$2,035.00	\$ 2,695.00	
Scott VanPalin- Ketchikan			\$ 3,695.00	

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Fax: (907) 747-6105

North Pacific Fishery Management Council
605 West 4th Avenue, Ste. 306
Anchorage, AK 99501
September 22, 2008

Re: Agenda Item C-1: Halibut Catch Sharing Plan

Dear Chairman Olson and Member of the Council:

These comments are submitted on behalf of the Sitka Conservation Society (SCS). SCS is Alaska's oldest conservation society and is a non-profit organization supported by its members and guided by a board of directors. Since 1967, the SCS has worked to protect marine and terrestrial wildlife throughout the Tongass National Forest and its surrounding coastal waters. Its membership includes commercial fishermen, lodge owners, non-Native and Alaska Native subsistence resource users and local recreational fishermen, all of whom have an interest in the conservation of the halibut resource. The Sitka Conservation Society has actively advocated for healthy, sustainable local fishery resources, worked to protect and restore freshwater salmon habitat, participated in marine habitat management processes to ensure that coastal development activities do not jeopardize fishery resources and above all promoted a vision for a sustainable local economy based on responsible, science-based management of our natural resources.

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As explained in more detail below, we respectfully submit that CSP Options 2 and 3 for fixed poundages carry unjustifiably high risks in terms of resource conservation and fail to address the issues of local depletion and the needs of those "who depend on the halibut resource for food." For these reasons, we support either Option 1a or Option 1c because these options provide for a fixed percentage at levels that have lower impacts on local depletion than Options 1b and 1d. Further, we continue to be concerned about the data deficiency for the guided angler fishery and urge the Council to minimize reliance on the delayed feedback loop timeline and instead establish a conservative GHL for the guided angler fishery to ensure that area-wide harvest remains within CEY until accurate and verifiable data collection measures are developed to support in-season, abundance based management.

As an initial matter, we understand that this proposed regulatory amendment addresses a complex, contentious issue: the instability caused by the absence of a hard allocation and the challenging task involved in "balancing the needs of all who depend on the halibut resource for food, sport or livelihood." We appreciate the Council's sincerity and efforts in this regard but respectfully submit that the significance of local sustainability requires

more thorough analysis and a management response that accords due weight to the needs of all resource harvesters for stability.

A major shortcoming of this process is that, in our view, the EA/RIR/IRFA analysis of the proposed regulatory amendment for a Catch Sharing Plan (CSP) did not adequately assess the impacts of CSP options on long-term resource conservation, subsistence and non-guided local recreational use of the halibut resource. The primary focus of the analysis was on allocative impacts to the commercial setline fleet with little recognition of two equally significant problems with the perpetual guided angler fishery harvest GHL exceedances: the fact that the exceedances are a conservation issue and the significant impacts of the exceedances on subsistence and local recreational fishery harvests.

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Thank you for considering our concerns,

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REFERENCES

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International Game Fish Association Fishing Hall of Fame & Museum

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Phone: (954) 924-2628 • Fax: (954) 924-4299 • Museum Fax (954) 924-4220

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September 15, 2008

Mr. Denby Lloyd

Commissioner of Fish for the State of Alaska

Dear Mr. Lloyd,

The International Game Fish Association endorses the two halibut fish rule for the entire Alaska recreational halibut fishery (whether accessed by charter boat or private boat) developed and proposed by the Halibut Charter Task Force with the support of all the major charter organizations in Alaska.

The IGFA asks your Department support the proposed rule in front of the NPFMC as well. The IGFA believes strongly in the two fish limit as a necessary element to protect anglers' historic share of this precious recreational resource. Recreational halibut fishing is an integral component of a strong Alaska tourist economy and of the economic health of its coastal communities.

Halibut are prized as one of the state's premier target species and reducing the bag limit to one fish per person per day, absent a clear biological mandate, would be inconsistent with modern management practices and would most certainly have a negative effect on an angler's decision to book a charter.

The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.

Sincerely,

Rob Kramer
President

WHETHER FRESHWATER OR SALTWATER, SHARE IN THE LOVE OF FISHING AND THE CONCERN FOR ITS FUTURE.

Education • Conservation • Recreation

Email: HQ@igfa.org • Website: www.igfa.org



Charter Halibut Task Force

P.O. Box 8500 Ketchikan, AK 99901 www.charterhalibut.org 1-877-588-8819

September 24, 2008

Mr. Eric Olson
Chairman
North Pacific Fishery Management Council
605 West Fourth Avenue, Suite 306
Anchorage, Alaska 99501

Agenda Item C-1(b)

Dear Chairman Olson and Members of the Council:

The Charter Halibut Task Force (CHTF) is comprised of owners and managers of halibut guided charter operations in International Pacific Halibut Commission (IPHC) Areas 2C and 3A. Many of our members were plaintiffs in the ongoing lawsuit against the one halibut daily bag limit rule for Area 2C that was enjoined by the court (and has now been withdrawn by NMFS). The CHTF has grave concerns about the current suite of alternatives being considered by the Council. We request that the Council postpone final action on a catch sharing plan for Areas 2C and 3A until next April and add the charter sector alternative proposed below as an option for consideration at that time.

The Council should delay final action and consider the charter sector alternative proposed below because of the severe adverse economic impacts that the current suite of alternatives would impose on the charter operators and local economies for a very small benefit to the commercial sector. To put this in perspective, adoption of the one halibut daily bag limit in Area 2C for 2008 resulted in less than 186 pounds of additional halibut each for 57 percent of the 2C IFQ holders, and less than 620 pounds of additional halibut each for another 22 percent of the 2C IFQ holders.¹ The Area 2C IFQ fleet received this additional halibut in 2008 notwithstanding the court injunction because the IPHC in January "assumed" the one halibut limit would be in effect and increased the commercial catch limit for 2008 by 385,000 pounds based on that assumption. See Appendix 1.

In contrast to this minimal gain for the vast majority of the IFQ holders, the economic losses to charter operators from imposing a one halibut daily limit are severe. According to the chart on page 74 of the August 28, 2008 Draft EA/RIR/IRFA, which uses an overly conservative estimate of \$225 per charter customer, the difference in charter sector revenue between a one halibut a day limit and a two halibut a day limit in Area 2C for 2008 is 9.72 million dollars versus 17.81 million dollars, or a loss of 8.09 million dollars for the Area 2C charter operators in 2008 alone. (Compare the dollar amounts shown for option 1a, the current GHL of 931,000 pounds, with option 2c, 1.9

¹ According to Linda Behnken, Director of the Alaska Longline Fishermen's Association, for Area 2C "in 2008, 79% of the 1,339 QS holders own 10,000 pounds or less of Southeast halibut IFQ, and 57% hold less than 3,000 pounds of Southeast halibut IFQ." Affidavit of Linda Behnken, paragraph 4, 6/22/2008.



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million pounds fixed, which is roughly the charter harvest in 2007). At an ex-vessel price of \$4.50 a pound, the 385,000 additional pounds the IPHC awarded the commercial IFQ fleet in Area 2C by assuming implementation of the one halibut rule in 2008 represents a gain of 1.73 million dollars to the Area 2C IFQ holders. The disproportionate and irreparable loss to the charter operators is clear, and is part of the reason the court enjoined the 2008 rule.

More than 240,000 recreational anglers fished on charter vessels in Areas 2C and 3A in 2007 and still managed to take less than six million pounds out of the more than 57 million pounds of halibut allocated by the IPHC to commercial and guided recreational catches off Alaska for 2007. NMFS and the Council have never explained why guided recreational anglers should be limited to something less than 11 percent of the halibut made available by the IPHC for commercial and guided recreational anglers each year. There is nothing fair and equitable about limiting more than 240,000 recreational anglers to one halibut, or two halibut with a slot limit or an annual limit, in order to add no more than 1.5 million pounds to the more than 50 million pounds the commercial IFQ fleet harvests each and every year off Alaska.

Another reason the Council should delay action is that the economic analysis in the August 28, 2008 Draft EA/RIR/IFRA completely ignores relevant prior research that would provide a clearer picture of the inequities caused by the Council's proposed suite of alternatives. As CHTF has pointed out in prior testimony to the Council, the entire recreational sector, guided and unguided anglers combined, has accounted for less than 10 percent on average of all halibut caught off Alaska over the past 10 years. This is a far cry from the 89 percent of halibut that is devoted to commercial fisheries. Yet nowhere is this imbalance in allocation discussed in the Draft EA/RIR/IFRA. In fact, in three of the papers cited as a reference in the Draft EA/RIR/IFRA (see page 123), Council members may be surprised to learn that Dr. Keith Criddle, a member of the Council's Scientific and Statistical Committee, has published an economic model of the Pacific halibut fishery which demonstrates that the optimal allocation of the fishery in terms of maximizing net benefits for both commercial and recreational users is to allocate 71 percent to the commercial fishery and 29 percent to the recreational fishery. Yet none of the options currently under consideration comes close to such an overall optimal allocation, and neither the Council nor NMFS has provided any explanation for why not. Adding the charter sector alternative proposed below to the suite of options under consideration would be a step toward providing a more fair and equitable allocation.

Along the same vein, the Council is fully aware that additional economic research is being conducted by the Alaska Department of Fish and Game (ADF&G) and NMFS. The results of at least the ADF&G research should be available in December – more than enough time to be utilized in analysis for an April Council meeting. Further, as Dr. Hans Radtke, an economist and former chairman of the Pacific Fishery Management Council



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will explain in separate testimony, the existing research already provides a basis for economic modeling that can be done and would provide relevant information on costs and benefits that is presently lacking. The Council should delay action until such work is done.

Finally, it bears repeating that the alternatives before the Council are purely allocative – they are not necessary for the conservation of the halibut stock nor do they address localized depletion. The August 28, 2008 Draft EA/RIR/IRFA clearly states on page 5 “none of the proposed alternatives is expected to significantly impact the halibut stock.” In fact, only the charter sector alternative proposed below would actually promote conservation of the resource, through its provisions that ensure that halibut given up by the recreational sector if a one fish daily limit becomes necessary are not simply reallocated to the commercial fleet but are instead left in the water to rebuild the halibut stock. NMFS has also made clear that there is no conservation concern justifying these allocation decisions. In response to comments arguing that the one halibut daily bag limit in Area 2C was necessary for conservation reasons and that Area 2C would be overfished if the charter sector is not restrained, NMFS stated unequivocally in the Federal Register that “NMFS disagrees. The best available evidence indicates that the Area 2C stock is not overfished and the IPHC has not made that determination.” 73 Federal Register 30518 (May 28, 2008). NMFS also said that they had no data to show that localized depletion is occurring, that localized depletion is not a threat to the resource, and that a one fish rule does not address that issue. 73 Federal Register at 30507 and 30517 (May 28, 2008).

Turning now to the specifics of the Council’s current suite of alternatives. As the Council is well aware, the purpose of recreational fishing, in contrast to commercial fishing, is not to catch a specific number of pounds of fish to sell. It is the possibility of catching a couple of fish, which may be big or may be small, that leads anglers to book far in advance and to commit to the substantial expense of traveling to coastal towns in Alaska and procuring lodging and guided charter services. In this regard, the CHTF appreciates the Council’s recognition of the specific need of the guided charter sector for advance notice and predictability with regard to management tools. The CHTF also understands that the stated purpose of the Council’s proposal is to address the conflict between the charter and commercial sectors with respect to an allocation of the halibut resource. Unfortunately, as discussed in more detail below, the current suite of alternatives under consideration by the Council is likely to have the opposite effect.

To resolve this conflict between the sectors, the Council has proposed initial allocation levels for the charter sector in Areas 2C and 3A, and supplements this initial allocation with a proposed leasing system, under which commercial IFQ holders may lease a portion of their IFQ privileges to charter operators to allow their clients additional harvest privileges. At the outset, the CHTF submits that under current NMFS



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regulations, which provide for a two-halibut daily bag limit in both areas for the charter fishery, these measures would be unnecessary. The Council's proposed IFQ leasing system only becomes necessary if the charter sector is limited to a one halibut daily bag limit. In fact, because the Council proposes to cap the guided recreational anglers who use Guided Angler Fish (GAF) at the daily limit for unguided recreational anglers, the GAF system could operate only under a one halibut daily rule. Under a two halibut daily rule, the GAF leasing program would be neither necessary nor permissible by its own terms. A one-halibut daily bag limit allocation with a purported right to purchase additional fishing privileges from the commercial sector, however, is not the same as an allocation of fish, and it certainly is not a "fair and equitable" allocation. Instead, such a scheme, if adopted by NMFS, would represent an express abdication by NMFS of its responsibility to make a fair and equitable allocation of the resource.

The CHTF respectfully submits that the Council's current suite of proposals suffer from three primary deficiencies: (1) the allocation levels under consideration are legally insupportable in light of NMFS' responsibility under the Halibut Act to ensure that any allocation action is "fair and equitable," (2) the allocation levels and leasing mechanism are not likely to resolve the recognized conflict between sectors as a practical matter, and (3) the leasing mechanism is inconsistent with existing NMFS regulations governing the use and transfer of IFQ shares. The CHTF describes these deficiencies in greater detail below, and suggests an alternative catch sharing plan for the Council's consideration. We begin with the alternative proposal.

CHARTER SECTOR ALTERNATIVE PROPOSAL

The charter sector alternative proposal would use an IPHC estimate of the entire – or coastwide (i.e., all IPHC areas combined) – halibut spawning biomass as the trigger point for a reduction of the daily bag limit for all recreational fishermen – both guided and unguided – throughout Alaska. The trigger point would be 225 million pounds, which is equal to 30 percent of the IPHC's current best estimate of what the coastwide halibut spawning biomass would be in the absence of fishing, a number referred to in the IPHC literature (Hare and Clarke 2007 IPHC Harvest Policy Analysis) as B_{30} .

For reference, the most recent current IPHC estimate of the coastwide halibut spawning biomass is 300 million pounds, or 40 percent of the coastwide unfished halibut spawning biomass. This means a significant drop in the coastwide halibut spawning biomass would have to occur before this trigger point is reached. According to IPHC figures, B_{30} has not been reached since at least 1996.

Under the IPHC's current policies, B_{30} is the point at which the coastwide halibut spawning biomass would be viewed as at a low level that raises serious conservation concerns, so the target harvest rate (which affects the amount of halibut available for all



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removals) would be reduced to allow for rebuilding. B_{20} – or 20 percent of the unfished halibut spawning biomass – is used by the IPHC as a conservative approximation of the historical low and is the point at which all fishing would be severely restricted or cease.

The alternative proposal would have the following elements:

1. All recreational fishermen (guided and unguided) would have the same daily bag limits for all areas off Alaska. There would be no slot or annual limits.
2. The recreational daily bag limit would be two fish when the coastwide halibut spawning biomass for that year is estimated by the IPHC to be equal to or greater than 225 million pounds, or B_{30} .
3. The recreational daily bag limit would be one fish if the coastwide halibut spawning biomass is estimated by the IPHC for that year to be less than 225 million pounds, or B_{30} .
4. If the coastwide halibut spawning biomass is estimated by the IPHC to be below 225 million pounds (B_{30}) for any particular year, the Secretary of Commerce would issue rules (or implement rules adopted in advance) to:
 - A. Reduce the recreational daily bag limit off Alaska to one halibut per day.
 - B. Reduce the commercial bycatch caps by the same percentage as the directed commercial catch limit is reduced based on the average reduction for all IPHC areas off Alaska (i.e., IPHC Areas 2C through 4).
 - C. Not apply the IPHC's "Fast Down" policy in setting the commercial fishery catch limit, so that the realized harvest rate is the same as the target harvest rate and the commercial fishery catch limit would be set equal to the Fishery CEY.
 - D. Deduct from the Total CEY the estimated amount of halibut that would have been removed if the reductions required by actions A and B had not occurred, so that the halibut saved by these reductions are not simply re-allocated to the directed commercial fishery. These reductions are instead left unharvested to more quickly rebuild spawning stocks.

This alternative has numerous advantages over the present interim proposals. It would be easy to understand, easy to enforce, would increase safety for recreational fishermen, and minimize waste of agency and Council resources by eliminating the need for extensive annual analysis and debate of management measures. The proposal



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recognizes the importance of advance notice and certainty for a destination fishery like Alaska, and would continue to allow a season of historic length. It also would establish a clear point at which all recreational fisheries would be reduced by 50 percent to assist in the conservation and rebuilding of the halibut stock.

By ensuring that all recreational anglers have the same daily bag limit throughout Alaska, this proposal reduces the adverse impacts of a reduction in the daily bag limit by not penalizing anglers for fishing where they wish to or for accessing the resource using charter vessels. This proposal would provide consumer certainty with respect to what the recreational halibut management regime will be from year to year in Alaska. In addition, this proposal would prevent the inevitable increase in unguided fishing harvests that will occur if there are different rules for guided and unguided recreational anglers. This increase in unguided harvests would simply cause the current problem to reappear as commercial catch limits are once again reduced to account for recreational harvests, to the dismay and anger of commercial fishermen who would have mistakenly thought their "uncompensated reallocation" problem was solved.

This proposal would also save consumers and government a considerable amount of money on an annual basis because it would eliminate the costly and cumbersome accounting requirements and administrative infrastructure that would be required for the Council's proposed leasing options, and would also eliminate the need for extensive annual review and justification of annual management changes as the Council and NMFS attempt to hold the recreational sector to a specific poundage allocation each year.

The proposal benefits the commercial fishing sector by establishing in advance an automatic mechanism for reducing the recreational harvest by 50 percent should the halibut stock reach the threshold at which the IPHC has said it would reduce the target harvest rate for the halibut stock. This significant reduction will aid in the rebuilding to the halibut stock more rapidly for the benefit of all users and ensures that the recreational sector contributes to conservation of the resource.

The Council has proposed a moratorium on the number of charter operators in Areas 2C and 3A, and NMFS is presently working on proposed implementing regulations. With a moratorium in place, commercial concerns about continued growth in the charter sector will be addressed by the effort restrictions imposed by the moratorium. The moratorium, in conjunction with the charter sector alternative proposal described above, would create a stable, predictable, equitable, and non-discriminatory allocation structure that would have the added advantage of including a built-in mechanism for addressing conservation concerns should they arise. The charter sector alternative proposal is also permissible under the Northern Pacific Halibut Act of 1982 (the Halibut Act), something that cannot be said of the Council's current suite of proposals. The CHTF now turns to the legal issues raised by the Council's current proposals.



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The Council's Current Proposals are Legally Insupportable

Section 5(c) of the Halibut Act provides in relevant part that: “[i]f it becomes necessary to allocate or assign halibut fishing privileges among various United States fisherman, such allocation shall be fair and equitable to all such fisherman, based upon the rights and obligations in existing Federal law, reasonably calculated to promote conservation, and carried out in such a manner that no particular individual, corporation, or other entity acquires an excessive share of fishing privileges.” 16 U.S.C. § 773c(c). The Council’s proposals are not “fair and equitable” under the Halibut Act for a number of reasons.

First, the Council’s proposals are almost entirely tied to the GHL, either explicitly or implicitly. Element 1, the initial fishing allocation, contains two options that are based on either a fixed percentage or fixed pound allocation. Both of these options are tied to the “GHL formula.” However, there has been no explanation offered by the Council, and no determination made by NMFS, that the GHL itself reflects a fair and equitable allocation. Thus, before NMFS could consider adoption of the Council’s proposal or any other proposal that is tied to the GHL, NMFS would first have to provide a rationale for why regulating the guided sector to the GHL would result in an allocation that is fair and equitable among the guided recreational, unguided recreational, and commercial fishing sectors. To date, it has not done so.

In fact, in addition to the reasons cited at the beginning of this letter, it is apparent that the GHL was never a fair and equitable allocation. As the tables on page 43 of the August 28, 2008 Draft EA/RIR/IRFA shows, the GHL has been exceeded every year since it was implemented in 2004 in Area 2C and 3A (the table shows the 2007 estimate for Area 3A of 3.40 million pounds – the ADF&G final numbers released on September 5, 2008 put the Area 3A charter harvest at 4.00 million pounds). Not only did the GHL as implemented not contain any room for growth, it was already inadequate to accommodate the existing harvest from the day it was put in place. Without a moratorium on new entry into the charter sector, which the Council’s analysis at the time clearly showed was occurring and was projected to continue to occur, there was nothing that the existing charter operators could do individually or collectively to attempt to stay under the GHL. Now, four years after the GHL was implemented and 15 years after this debate first began, the charter sector is finally expecting to see moratorium regulations published this fall, but those will not be in place until 2010.

To illustrate how unfair the GHL formula is simply consider this – the GHL for Area 2C sets as its benchmark for the charter sector only 13 percent of the combined commercial and charter harvest. In 2008, 13 percent of the combined commercial and charter harvests equals 931,000 pounds, the current GHL for Area 2C. The 87 percent



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commercial / 13 percent charter division envisioned in the GHL means that the combined commercial and charter catch limit for Area 2C would need to be 13.84 million pounds before charter anglers in 2C could expect to see a two fish daily bag limit with no other restrictions, assuming a 1.8 million pound charter sector harvest, which was the amount taken in 2006 when there were no restrictions. To get to a 1.9 million pound harvest, the highest option on the table and less than what was caught by Area 2C charter anglers in 2007 or 2005, the combined commercial and charter catch limit would have to be 14.75 million pounds, with a commercial catch limit of 12.85 million pounds.

The Council should realize that there is almost no scenario under which Area 2C can expect to see a combined catch limit of 13.8 million pounds, much less 14.75 million pounds. A 13.8 million pound combined catch limit would equal a commercial catch limit of 12 million pounds. That is 1.1 million pounds higher than the highest commercial catch limit ever in Area 2C. As a result, it is clear that the GHL division is unrealistic. In contrast, adopting the charter sector alternative proposal set forth above would result in the charter sector getting just 25.2 percent of the 2008 combined commercial and charter catch allocation – which means that the commercial sector still gets allocated almost 75% of the available halibut. Interestingly, a 25.2 percent allocation for the charter sector comes much closer to the optimal 29 percent sport/71 percent commercial allocation modelled by Dr. Criddle in his 2004 paper that is referenced, but not discussed, in the August 28, 2008 public review draft.

Second, the Council's proposal is not an allocation plan. 50 C.F.R. § 600.325(c)(1), which deals with National Standard 4 under the Magnuson-Stevens Act, states that: "An 'allocation' or 'assignment' of fishing privileges is a direct and deliberate distribution of the opportunity to participate in a fishery among identifiable, discrete user groups or individuals." Although the Act is not directly applicable here, the regulatory definition describing a "direct and deliberate distribution" is instructive. That definition makes clear that, if the Council is going to recommend that NMFS consider an allocation scheme, the proposed scheme must definitively apportion the resource. The Council's GAF/IFQ leasing proposal does not do that. Instead, the Council's proposal would reduce the charter sector harvest by approximately half and award those harvest rights to the commercial sector, and then purport to allow the charter sector to buy back the fish that were just reallocated to the commercial sector. In addition to being illogical, the proposal completely avoids the very question that it must legally address; i.e., what is a fair and equitable allocation of the resource?

Third, in addition to the fact that the Council's proposal does not fulfill the statutory task for which it was designed, it is unworkable by its own terms. Even if taking privileges from one sector, giving them to another sector, and then allowing the first sector to lease those privileges back were an outcome contemplated by the Halibut Act (it is not), the system as proposed will almost certainly fail to produce that result.



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Because there is no mechanism in the Council's proposal to compel the commercial sector to sell harvest privileges to the charter sector and no mechanism to regulate the price, there is no reason to believe that the commercial sector will sell privileges to the charter sector, and thus no reason to believe that most, if not all, guided recreational anglers will be subject in most years to anything other than a one-fish daily bag limit. As such, the only "allocation" is the one embodied in the initial allocation, and those allocation options would result in a one-fish daily limit or annual caps immediately in Area 2C, and in the not too distant future for Area 3A. The Halibut Act requires the Council and NMFS to explain how a one halibut daily limit or annual caps on the charter sector are fair and equitable when the entire recreational sector accounted for less than 10 percent of the halibut caught off Alaska each year for the past 10 years. Neither the Council nor NMFS has made any such finding, nor is there any reason to think that either could make such a finding under current stock conditions.

As discussed on page 1 of this letter, a one halibut a day limit provides only a small additional amount of halibut to each IFQ holder, yet it would impose crippling, irreparable hardship on charter operators. After NMFS attempted to impose a one halibut daily bag limit in Area 2C, several charter operators lost hundreds of thousands of dollars in revenues, and experienced multiple cancellations of repeat and regular clients who would not undertake the expense of traveling from out of state to Area 2C under a one halibut rule. As a result of these losses, which were attested to in sworn affidavits, a federal judge issued a preliminary injunction to prevent implementation of the one fish rule based on that irreparable harm.

The Council's proposal is also unfair and inequitable because it seeks to treat the guided and unguided sectors of the recreational fishery differently. For example, under the Council's current suite of alternatives it is quite likely in Area 2C that unguided recreational anglers would have a two halibut daily limit, while guided recreational anglers would have a one halibut daily limit, coupled with a largely illusory option to lease additional harvest privileges if their charter operator could find a willing IFQ holder from whom to lease additional fish. The only difference between the two groups is that the members of one group choose to hire guides (for a range of reasons including lack of boat ownership or access, convenience, access to knowledge and skill, and safety) while the members of the other group have access to private boats. There has never been an explanation offered by the Council or by NMFS of why this difference, which has no relation to any conservation or management purpose, justifies different treatment as between these two groups.

In addition to treating guided and unguided recreational anglers differently for no apparent purpose, the Council's proposal also discriminates against out-of-state fishermen. Guided anglers in Area 2C are overwhelmingly from States other than Alaska, while unguided recreational fishermen in Area 2C are predominantly in-state



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residents. Thus, although the differences in the treatment of guided and unguided anglers discussed immediately above may be facially neutral with respect to the state of residence of those anglers, there is a real and substantial disparate impact on anglers from states other than Alaska that contravenes the requirements of the Halibut Act.

For all of these reasons, which are certainly not exhaustive, there are legal problems with the proposed IFQ leasing system that must be addressed before a Council proposal can move forward with any reasonable chance for success.

The Council's Leasing Proposal is Impracticable

In addition to the legal problems inherent in the Council's proposal as discussed above, there are a number of practical reasons why the Council's proposal is unlikely to resolve the conflict between the commercial and charter sectors or the tensions in coastal communities that rely on the halibut resource. The CHTF takes the opportunity below to summarize a few of the key issues that make the Council's proposal impracticable.

- The Council's IFQ leasing proposal is not an allocation. The Council's proposal only provides a right to the charter sector to lease IFQ privileges from the commercial sector, but there is no means to compel the commercial sector to lease such rights. Thus, there is no guarantee that the commercial sector will actually lease such rights. The August 28, 2008 Draft EA/RIR/IRFA acknowledges this problem in passing at page 108, but offers no real analysis or explanation of why IFQ holders would be expected to lease quota to charter operators.
- In order for it to make sense from an administrative and economic standpoint for the commercial sector to lease IFQ rights to the charter sector, the commercial sector would have to lease at a price that is considerably higher than the value of the fish that they would catch and sell on the market, which would likely be a price too high for most charter operators to absorb. Neither the Council nor NMFS has performed an economic impact analysis on how this proposed IFQ leasing system would affect the charter industry. Before either could proceed with this proposal, such an analysis would have to be conducted. In this regard, the Council's August 28, 2008 Draft EA/RIR/IRFA at pages 19 and 76 simply asserts without explanation that excess costs associated with leasing GAF could be passed through to charter clients. Given the elasticity in the market demonstrated by the defection of Area 2C guided clients before the one-fish rule was enjoined by the court in June of this year, it is unreasonable to simply assume that a significant price increase would have no effect on bookings.
- When the charter operators recently challenged NMFS' one-halibut rule in court, several representatives of the commercial sector intervened to strongly support the



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one-fish rule. These commercial sector representatives strenuously opposed any additional "allocation" to the charter sector because it would cut into their own allocation. It is therefore unreasonable to believe that the commercial sector would not use all of their own IFQ rights, and makes it unlikely that they would lease their rights to the charter sector even if they did not use all of their IFQ themselves. Quite simply, the Council's proposal to reduce conflict between the sectors places one sector in the position of determining the survival of the other. That is not acceptable either as a practical matter or as a legal matter.

- The proposed IFQ leasing system does not address the specific need of the charter sector for advance notice and predictability, which the Council itself stated was critical in its proposal. Charter clients will not expend significant resources to travel to Alaska and book reservations far in advance simply on the possibility that the commercial sector might lease IFQ rights. Especially since the size of a given Quota Share in any given year is not determined until the IPHC makes its CEY determinations public in the early spring of each year, that information comes too late to support advance bookings that are today typically made eight to eighteen months in advance. Moreover, determination of QS size is just the beginning of the process for negotiating GAF leases. By the time that process was completed – if indeed IFQ holders could be induced to lease at commercially viable prices – the recreational season would be very close at hand. During that extended period of uncertainty, guided charter operators could not provide any assurance of harvest privileges to clients inquiring about bookings.
- If the commercial sector does not ultimately lease a significant portion of its IFQ rights to the charter sector, in addition to whatever economic losses charter operators sustain, the businesses and local economies that cater to guided recreational anglers would sustain economic losses as well. No impact analysis has been performed to forecast what kind of adverse economic impacts this proposal will have on the coastal communities that rely on guided recreational anglers' access to the public halibut resource.

The Council's Leasing Proposal is Inconsistent with Existing IFQ Regulations

The Council's leasing proposal seeks to permit commercial IFQ holders to lease part of their existing IFQ privileges to charter anglers in order to provide them with additional harvesting opportunities. Under existing NMFS regulations governing the transfer of IFQ shares, in order to be eligible to receive a temporary or permanent transfer of IFQ privileges, a party needs to either be an initial commercial IFQ issuee or have had 150 days or more of experience working as part of a harvesting crew in any U.S. commercial fishery. *See* 50 C.F.R. § 679.41(d)(6)(1). Since virtually no charter angler



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has met either of these requirements, the Council has essentially proposed to allow IFQ shares to be leased to unqualified and unintended transferees. The only way the Council's proposal could move forward would be if NMFS amended its existing regulations on IFQ transfers to remove these restrictions or created a specific exception for the Council's proposal. Either way, NMFS would be required to initiate a rulemaking procedure pursuant to the Administrative Procedure Act allowing for public notice and comment. In adopting any new regulation or exemption, NMFS must explain why such a regulatory change is both necessary and reasonable. There is no evidence that either the Council or NMFS has even considered these questions.

In addition, the issue of qualified transferees calls into question the primary purpose behind NMFS' IFQ transfer restrictions, which are intended to keep harvesting privileges within the commercial sector. In the rulemaking leading up to the adoption of the IFQ regulations, NMFS stated that specific restrictions on the transfer of IFQ privileges were intended to ensure that IFQs would continue to be held by commercial fisherman after the initial allocation process. The purpose behind requiring a potential IFQ transferee to have commercial fishing experience was to "assure that IFQs remain in the hands of fisherman who have a history of past participation and current dependence on the fishery." 57 Federal Register 57130 (December 3, 1992). The Council's proposal obviously undermines this regulatory intent. Moreover, and perhaps ultimately more important, the regulatory intent of keeping commercial IFQ privileges within the commercial sector underscores the fact that, as a practical matter, individuals within the commercial sector will be unlikely to lease any portion of their IFQ fishing privileges to non-commercial fisherman.

Conclusion

CHTF urges the Council to delay final action on a catch sharing plan for Areas 2C and 3A until next April and to add the charter sector alternative proposal to its suite of options for consideration at that time. CHTF would be pleased to provide any additional information that would assist the Council in its deliberations.

Sincerely,

Earl W. Comstock
Counsel for the Charter Halibut Task Force

Attachment: Appendix 1



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Appendix 1

Calculations Showing How the IPHC Assumption that 2C Charter Harvest Will be Held to the GHL Increased the Area 2C Commercial Catch Limit for 2008 by 385,000 Pounds¹

Scenario 1: IPHC formula used for Area 2C commercial catch limit in 2008

Exploitable Biomass	32.5 million pounds
Harvest Rate	20 percent
Total CEY	6.50 million pounds (EBio times Harvest Rate)
Other Removals	2.59 million pounds (assumes charter is held to the 2008 GHL of 0.931 million pounds)
2007 Catch Limit	8.51 million pounds
Fishery CEY	3.92 million pounds (Total CEY minus Other Removals)
2008 Catch Limit	6.210 million pounds (calculated using the IPHC's "Slow Up, Fast Down" (SUFD) policy, which means you subtract $\frac{1}{2}$ the difference between the 2007 Catch Limit and the Fishery CEY from the 2007 Catch Limit, or 8.51 million pounds minus $(8.51 \text{ million pounds} - 3.92 \text{ million pounds})$ divided by 2 = 2.30 million pounds) = 6.21 million pounds)

Scenario 2: Area 2C commercial catch limit if IPHC's assumption of the GHL in Other Removals is replaced by 2007 estimated charter harvest of 1.7 million pounds

Exploitable Biomass	32.5 million pounds
Harvest Rate	20 percent
Total CEY	6.50 million pounds (EBio times Harvest Rate)
Other Removals	3.359 million pounds (assumes charter removals equal the ADF&G estimate from October 2007 of 1.7 million pounds)



Charter Halibut Task Force

P.O. Box 8500 Ketchikan, AK 99901 www.charterhalibut.org 1-877-588-8819

2007 Catch Limit	8.51 million pounds
Fishery CEY	3.14 million pounds (TCEY minus Other Removals)
2008 Catch Limit	5.825 million pounds (calculated using SUFD policy, which means you subtract $\frac{1}{2}$ the difference between the 2007 Catch Limit and the Fishery CEY from the 2007 Catch Limit, or 8.51 million pounds minus (8.51 million pounds – 3.14 million pounds divided by 2 = 2.685 million pounds) = 5.825 million pounds)

The difference between the ADF&G estimated harvest of 1.70 million pounds and the assumed GHL harvest of 0.93 million pounds is 770,000 pounds. The difference between the 6.210 million pound catch limit with the GHL assumption and the 5.825 million pound catch limit using the ADF&G estimated 2007 charter harvest is 385,000 pounds, half of the difference between ADF&G estimated harvest and the GHL, thanks to the IPHC “fast down” policy.

Dividing the Scenario 2 Catch limit by the Scenario 1 Catch Limit, we arrive at the percentage difference between catch limit calculations:

$$5.825/6.210 = .9380$$

From this ratio it is easy to compare the before and after impact of the IPHC’s assumption of the GHL (due to NMFS one halibut rule for 2C charter anglers) on commercial catch limits:

An Area 2C commercial fisherman with 3000 pounds of TAC in Scenario 1 would receive $0.9380 \times 3000 = 2814$ pounds in Scenario 2, a loss of 186 pounds.

An Area 2C commercial fisherman with 10,000 pounds of TAC in Scenario 1 would receive $0.9380 \times 10,000 = 9380$ pounds in Scenario 2, a loss of 620 pounds.

¹ The calculations in the Appendix were verified by Greg Williams of the International Pacific Halibut Commission in e-mail correspondence with Rex Murphy on September 19, 2008.

September 26, 2008

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

Dear Eric:

Right up front, please accept my strong disagreement with statements by charter fishermen that they provide the public's only access to the halibut resource. Statements such as these are an insult to people throughout Alaska, the nation, and the world, who buy halibut at the local market and who are either unable or not at all inclined to come to our coast and book a halibut charter. The commercial fishery provides halibut to the dinner table in the most efficient manner by far, and it is in the interest of the vast majority that they can continue to do so.

I write this letter both for myself and for my son, Gus Linville, who is currently a deckhand fishing halibut and black cod on the longliner Vigilant in Area 3B and will probably be unavailable to testify. Commercial fishing has been the bread and butter for our family most of the thirty years that I have lived here in Seward. All three of my children were born here and have accompanied my wife and myself on various fish decks from the time they were infants. It is not surprising that my two sons now 21 and 19 years old are actively pursuing careers as commercial fisherman. The halibut/sablefish IFQ program has profoundly affected this family from the day it began and this NPFMC meeting stands to have a major impact on the success or failure of restricted access management in these fisheries in the years to come.

Being primarily a deckhand on longliners during the qualifying years, it was certainly not my preference that IFQ's be established without some acknowledgement for the contribution to a vessel's catch history by those such as myself. We got them anyway and even though I had worked in the fishery throughout the qualifying years, my initial allotment was a grand total of 3.1 lbs. We have, none-the-less, worked within the program in the ensuing years by buying quota as our finances would allow even to the point of investing the kids permanent fund dividends into it.

At the current time, Gus and I are two payments into a cosigned \$180000.00 loan through Northwest Farm Credit with a seven year payoff at 8.5% interest. We took this loan on immediately after paying off my first seven year quota loan with the same bank. In both cases we established financing, went out into the market, and paid the going price, and we will continue along this line so long as this management system can be fairly administered. For the 2008 year, our family's quota amounted to 25000 lbs. Gus also financed and built a new 32 foot halibut/salmon boat at Webber Marine and Manufacturing in Cordova, Alaska which was completed in time to fish the 2007 quota. As such, I have invested a good portion of my life, and my sons are staking their futures on the success of this management plan. We live, work, and play on this coast, and spend practically every cent we retain after the payments here as well. We pay real estate and sales taxes, and annual moorage in both Seward and Cordova and are active in the affairs of both towns year around.

I believe the main question before the Council at this time should be this: Is the restricted access management plan now in effect for the halibut resource worth saving or not? In today's world, I strongly believe it is. Current analysis suggests that this plan has as good a track record as any out there of scientifically managing a healthy resource in the face of overwhelming pressure from all sides. Many other areas of the country have seen previously healthy stocks crash and look upon this program as a model for how it should have been done. The ability to provide fresh fish into the market most of the year is definitely better from both the consumer and the harvester's perspective. Also, those who make the considerable commitment required to step up to the plate and buy in to the fishery definitely have the incentive to support conservative biological management to secure the resource in the future.

The major flaw in the current quota system for halibut is that not all stakeholders are playing by the same rules. That the charter boat industry is not included in the quota program is certainly not for lack of trying. A quota plan for charter boats very similar to the one proposed now was passed by this commission five years ago after extensive meetings and political process only to be left to languish and die in the bureaucracy of Washington DC. The race for fish in the charter industry continues unabated and now threatens to take down the whole system. A good example of their lack of conservation incentive can be shown by looking at Area 2C for the last couple of years. In spite of an over forty percent cut to commercial halibut quotas in the face of a declining resource, charter boat fisherman once again turned to a Washington DC court to override the one fish bag limit proposed by the ADF&G. In doing so the entire scientific basis of management by the IPHC

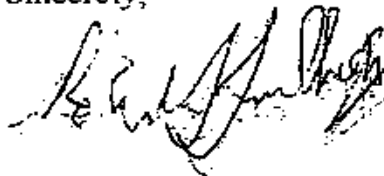
has been undermined. **How can any guideline harvest be enforced when you still have this free-for-all being promoted by those who stand to gain financially by not submitting to needed harvest limits? Have I slaved away for the last fifteen years buying into this program only to see my quota be used as a holding mechanism to be whittled away as necessary to prevent charter fisherman from overfishing the resource? If so, I believe this program, and ultimately the entire halibut resource will fail. I certainly will no longer support it.**

So, what should be done? Please allow me to make the following suggestions:

- Allocate the charter industry based upon the GHM percentages now in effect. It is not fair to take from those of us who have bought in to give to those who haven't.
- The charter industry allocation will need to rise and fall with the abundance of the resource. In this manner, all commercial fishing businesses, including charter operators, will be on the same page when it comes to conservation. This is the only way this system can survive over the long haul.
- Timely, accurate, and enforceable catch reporting simply must be instituted in order for any allocation of halibut quotas to work.
- Should the charter industry wish, a system to allow the inseason leasing of quota from the commercial sector should be instituted as an escape valve for an overbooked business.

Charter businesses should understand that in the future growing their business will not be done at the expense of others and to the long term demise of the resource. Although not blessed with a large quota in the beginning, we have worked within the system to expand and prosper. There is no reason that charter boat operators cannot do the same.

Sincerely,



Robert G. Linville
PO Box 1753
Seward, AK 99664
907-224-3252

TESTIMONY BY HANS D. RADTKE¹ BEFORE THE NPFMC AT THE OCTOBER 2008
MEETING IN CONSIDERATION OF PACIFIC HALIBUT MANAGEMENT

September 22, 2008

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1. Hans D. Radtke, Ph.D. is a freelance economist living in Yachats, Oregon. Dr. Radtke served as chairman of the PFMC from 2002-2003. He has authored many descriptive and analytical studies related to fisheries management. He was coauthor along with William S. Jenson of the Alaska FEAM economic model.

TESTIMONY BY HANS D. RADTKE BEFORE THE NPFMC AT THE OCTOBER 2008
MEETING IN CONSIDERATION OF PACIFIC HALIBUT MANAGEMENT

September 22, 2008

ABSTRACT

This testimony makes suggestions about whether sufficient economic effects descriptions are being presented to the Council for their decision making about halibut fishery fishing privileges. Authorizing treaties and legislation for this fishery's management require that economic effects be considered in the decision making. The economic effects descriptions could include measures of "fair and equitable" impacts to user groups, net benefits to the nation, and distributional impacts on Alaskan economies. Offering quantitative descriptions for these measures is a tall order for economists who must quickly apply available research and concisely describe the modeling results. Our review finds that sufficient scientific data and research exists, but is not being utilized. The testimony explains economic analysis tools that can be used for making net economic value and regional economic impact estimates. For example, we have demonstrated that the movement of halibut catch from recreational to commercial harvests within the envelope of catch sharing amounts being considered by the Council will show a net reduction in net economic value to the nation and dollar flows out of Alaskan economies. While a more thorough application of available tools we mention would be warranted, at least it has been shown that the direction (positive or negative) and relative magnitude of the economic effects can be quantified. We conclude that improved measures for quantitative economic effects can be made and those descriptions should be available before decisions are tendered on this meeting's halibut fisheries agenda items.

INTRODUCTION

This testimony is to address whether there is adequate economic information being presented to the Council for decision making about management that will affect Pacific halibut fishing privileges. The decisions are for a catch sharing plan (CSP) between two of the main user groups and for a specific management technique that will alter one user group's future harvests. The management technique is a *de facto* allocation method that will end up restricting the amount of catch being taken by the charter boat sector in IPHC Area 3C. These are significant management issues that deserve economic effects descriptions. This testimony does not provide specific analysis results for this meeting's halibut fishery agenda items, but presents a broader view for whether sufficient scientific data and analysis is being brought to the Council for making these and undoubtedly future fishing privilege decisions.¹ It could be that the Council may want to consider this testimony by asking for additional economic effects information for this meeting's agenda items and/or for this fishery's future management decisions.

The halibut fish resource contributes to the ecosystems, cultures, and economies in Alaska. The history of the halibut fishery is illustrative of the conflict between conservation, cultural and food values, commercial fisheries, and recreational fisheries. The challenge of conserving halibut stocks is not unique in fisheries management.² Mortality from directed fishery harvest and harvest bycatch is a controllable mortality in conserving this fish resource. Extensive federal and state fishery management processes exist to manage this mortality, and the continuing harvest opportunities depend on the degree to which this management is successful.

The NPFMC has worked diligently on their responsibilities to promote conservation of this economically important species. The history and progress for developing sharing arrangements between user groups up to the NPFMC February 2001 meeting is aptly described in NPFMC (2001). That document was significant because it offered economic analysis decision making information as required by the Convention, IHA, and MSA. The economic analysis was able to utilize what was then recent studies [Lee et al. (1999a and 1999b), Herrmann et al. (2001), Wilen and Brown (2000), and others] for decisions related to commercial and charter boat sector allocations. While the mentioned charter boat sector studies were for recreational fishery participation in the Kenai area, explanations were offered for the applicability to determining statewide effects on the Alaskan economy.

Through several court decisions and rejections of management techniques by the Secretary of Commerce, the NPFMC has had to face and revisit many decisions about conservation and use of the halibut fish resource. The decision making for controlling the fishery and making allocations since the publication of the NPFMC (2001) document have not had the advantages of a similar level and extent of quantitative economic information. The subsequent documents do discuss and provide some numbers for the direct effects to the user groups and even offer partial calculations of net economic value for consumer surplus, but stop short of carrying through to model how those effects play out in the national and Alaska economies. This is a critical analysis step for regional economic impact calculations because of especially high trade leakage in the commercial fishing industry to the Puget Sound and other non-Alaskan economies. This testimony describes how results from economic studies that are now available can provide the economic analysis tools to determine economic effects from fishery management alternatives.

BACKGROUND

A description we provide for economic analysis tools relies on the Seung and Waters (2007) review of nine economic studies about the halibut fishery. The nine studies were limited to certain areas or differed in methods so extrapolations would be required for their applicability to the current decision making.

It would be convenient to have a measure of the relative economic effects from a unit of halibut catch taken in the commercial and sport fishing sectors, and then simply compare those two values. Recent work by Criddle (2004) may come closest to this by attempting to estimate the benefits-maximizing allocation of halibut between commercial and sport fisheries. It is rare that an economic benefit-maximizing study exists for a fishery. (Benefit maximization says an efficient allocation occurs when the combination of net benefits to consumers and producers in

each sector is greatest.) The catch share generating the highest economic benefits for the fishery described in the Criddle study is probably still applicable, since management techniques have attempted to keep the user group share the same in recent years. The Criddle study found that benefit maximization occurs when the commercial sector has 71 percent and the recreational sector has 29 percent of the harvest pounds as compared to an 87 percent and 13 percent in 2007 (NPFMC 2008a).

It is not generally straightforward to compare the impacts of a given quota or amount of fish available in one fishery versus an equivalent amount accessible in another fishery. Part of the difficulty is that researchers must use different "denominators" to calculate economic impacts of commercial versus recreational fisheries activities. Commercial fisheries impacts are driven by the ex-vessel value and average processing margin per unit of fish landed. Recreational fisheries impacts are driven by the amount and distribution of expenditures made by sport anglers fishing on private vessels or charter packages.

Another issue is confusion between concepts of "economic impact" versus "net benefit;" the two are not directly comparable. Economic impacts are a measure of the amount of money changing hands in a regional economy (i.e., the dollar value of transactions), while net benefits are a measure of the net value (value received in excess of the dollar amount paid) received by a defined group of recipients. For producers, net benefit roughly equates to economic profit. For consumers and non-users, net benefits are more difficult to measure and usually depend on interpreting responses to a carefully designed survey.

Economic impacts are typically measured using input-output (IO) models. In an IO model, industries produce "output" by combining goods and services purchased from other industries and households. The total amount paid by industry for all inputs used in production, including goods, services, imports, taxes and depreciation is called total expenditure. Total expenditure is the broadest measure of economic activity and is equal to total output or total sales by industry. However total output can bear little resemblance to the amount of value generated in the economy. For example, suppose a luxury car dealer sells an imported car for \$100,000. Total sales in the economy are \$100,000 but most of that amount goes overseas to pay for the factory where the car was made, shipping across the ocean, and delivery to the local dealership. Of the remainder, the dealer pays costs, including utilities, insurance, interest, advertising, and employee commissions or salaries. Only this latter item, and perhaps a small profit for the dealership owner are counted as "income" accruing to the local economy. The portion of total output paid by industry as wages, salaries, proprietors' incomes, dividends, interest and rent represent compensation for the use of labor and capital services. These industry production costs become income paid directly to the recipients. In total these payments are the components of personal income.

However even personal income is not a net benefit because (1) some of the costs of resources used and opportunity costs are not counted, and (2) changes in personal income may not necessarily accrue to the persons who resided in the region before the change occurred. While personal income is a closer measure of regional benefits than is total output, total sales or total expenditures, they are still not the same things. From a national perspective, the highest-value use of public resources is achieved by maximizing net benefits, where all values and opportunity

costs are accounted for. However from the standpoint of a local economy, economic impacts are more important than net benefits, as impacts represent an actual flow of funds in the economy. A policy that generates positive income impacts on local communities may not increase net national benefits, while one that maximizes net benefits may leave local communities out in the cold.

Several key assumptions greatly affect estimated impact results, especially in an economy as unique as Alaska's. The treatment of halibut quota payments is an example. Researchers can choose to treat payments for quota as an expense or as a stream of income to the quota owners. If the latter is chosen, as seems most reasonable, then the place of residence of the quota holder must be known. It has been estimated that 38 percent of Pacific halibut quota in Alaska is owned by non-Alaska residents. It has also been estimated that in 1998, nonresidents accounted for nearly one-fifth of total employment in Alaska. Non-Alaska residents filled more than half of seafood processing jobs, and nearly one-third of jobs in commercial fishing sectors.

Another important and related assumption in impact modeling is the amount of economic "leakage" in the economy, i.e., expenditures for imported goods and services, including labor. Economic impact models normally track incomes paid by businesses in a region but not necessarily to a specific group of recipients. Some income is paid to resident households, and some is paid to non-residents. Income paid to non-residents and purchases of goods and services produced non-locally represent imports into the region. Payments for imports do not count as income from the perspective of regional residents, and so do not figure in the calculation of benefits for residents.

As part of an ongoing project with the Alaska Fisheries Science Center to develop methodologies for evaluating the economic impacts of fishing in Alaska, models have been generated that are currently being used to estimate the impact of commercial fishing and seafood processing in Alaska. These models pay careful attention to the structure of Alaska fishing sectors and unique characteristics of the Alaska economy. One of these models was recently used to develop analysis for an article submitted to the journal *Fisheries Research*. This model can be readily tailored to estimate economic impacts (income and employment effects) of differential Pacific halibut catch levels in commercial and sport fisheries. The goal of the project is to develop a computable general equilibrium (CGE) model of fishing-related effects on the Alaska economy. Data descriptions and an I/O modeling extension for this research project have been completed by TRG (2007).

In calculating commercial fisheries impacts, the direct effects include amounts paid for fish purchased directly off the dock plus first wholesale value received by processors, (which includes ex-vessel value as a cost). Indirect effects include spending by suppliers of fuel, gear, ice, bait, food, electricity, water, equipment, etc. who sell directly to vessels and processors. Induced effects include the economic activity driven by the spending of income by fishing and processing crews, owners of the vessels and plants, and employees of the suppliers. Adding up all the rounds of re-spending in the economy produces the estimate of total economic impact. Adding up the amount of income paid out of the total output change produces the total income impact. Likewise for the number of jobs generated.

In the case of sport fisheries, the direct effects are the payments made by anglers for the goods and services directly related to their fishing experience. However it is sometimes difficult to determine whether expenditures are a direct result of the fishing trip or are related to another non-fishing activity. Researchers usually apportion expenditures among the different activities, and also make assumptions regarding which expenditures were made locally versus at home or en route. For this reason, total impacts, the sum of all direct, indirect and induced spending in the economy, can vary considerably depending on the share of total angler expenditures assumed to be both local and fishing-related.

Commercial fishing impact estimates do not generally address effects on sport anglers or consumers of processed seafood. Sport fishing impact estimates do not generally address effects on commercial fishers or consumers of processed seafood. Nor do they address any net benefits (i.e., willingness to pay minus the amount actually paid) enjoyed by the sport anglers themselves. However by simultaneously running the changes in apportionment of Pacific halibut quota and catch levels on both commercial and recreational fisheries, a resulting "net" effect of income change in the overall economy can be estimated.

Specific concepts to be wary in economic data descriptions and modeling are:

- **Substitution effects:** Assumptions about the possibility of substitutes are critical to the analysis of changes in net benefits or impacts from a given change in regulation.
- **Application of multipliers:** They should not be used to estimate economic values. Output multipliers larger than 2.5 should be carefully scrutinized.
- **Gross versus net benefits:** Assigning value on the basis of benefits or revenues alone (without costs) leads to exaggerated results.
- **Lump-sum tradeoffs:** "All or nothing" thinking ignores the importance of marginal changes in value. Efficient allocations are determined on the basis of incremental tradeoffs in NEV's.
- **Benefits transfer:** Applying or "transferring" measures of economic benefits or value from one fishery to another is of limited usefulness unless there is a high degree of similarity among fisheries.
- **Stated and revealed preference surveys:** These survey approaches to valuing recreational fisheries, such as contingent valuation, are potentially prone to bias. Because valuation is only "contingent," and not observed through market transactions, people have an incentive to shape their responses to influence the results. Research methods require careful structure and testing to ensure unbiased results. A revealed preference survey approach can be more useful to valuing recreational fisheries, such as the travel cost method, but is highly sensitive to the way the models are constructed.
- **There should be evidence that the models were validated using hindcasting and other ways of showing predicted/actual results, review for sensitivities to show limiting factors,**

discussion of error multiplying, and other characterizations to show their applicability and usefulness. These characterization would apply to both empirical and theoretical models regardless of whether they are considered static or have equilibrium features.

ECONOMIC ANALYSIS TOOL EXAMPLES

To show that existing economic modeling can be used for calculating economic effects, we draw upon a number of past studies and ongoing projects. It is a characterization to demonstrate that economic effects can be determined. While our suggested modeling has some complexity, it was still necessary to use a number of assumptions: 1) producer (commercial harvester and processor; and, charter boat operator) opportunity costs are zero, 2) charter boat industry producer surplus is negligible, 3) consumer willingness to pay and existing prices would be unaffected by the Council action, 4) the effects from other user groups such as unguided sportfishing, subsistence, etc. are relatively small, 5) non-values are inconsequential to the analysis, and 6) interactions with other fisheries are not economically significant. Incorporating methods that make estimates for these simplifying assumptions would add complexity to the analysis, but should not materially change the results. Having to use simplifying assumptions should not be an excuse to not perform a quantitative analysis (NMFS March 2007).

We describe our demonstration model below for making NEV and REI estimates per unit of catch for the commercial and recreational user groups.

1. Commercial Fishing

The above mentioned study to specify a CGE model of the entire commercial fishing industry sponsored by the NMFS Alaska Science Center provides the basis for making estimates of net economic value (NEV) and regional economic impact (REI) arising from the halibut commercial fishery.

a. Net Economic Benefits

Commercial fishing NEV is the sum of consumer and producer surplus. Herrmann and Criddle (2006) argue that policy considerations for halibut allocations between sectors can change consumer market relationships. However, the harvest amount being considered for switching is minor compared to the existing commercial quota. Market substitutions and product availability should not be affected by these minor quota perturbations. Acceptance of the argument means that consumer surplus can be assumed zero. A calculation of producer surplus is an accounting of the profitability of the fleet that participates in the halibut fishery and the profitability of the primary processor sector. There are subsequent indirect producer surpluses to other industries, but these two sectors are illustrative of the main NEV generators. A more thorough examination of this accounting is described in TRG (2003). The applications of this modeling approach to Alaska has to address an emerging financial consideration in the prosecution of Alaska fisheries. That is the permit lease payments being made for prosecuting limited entry fisheries where

individual fishing quotas (IFQ's) are privately held. Those payments are an added profitability to the calculation. The accounting in algebraic notation of per unit NEV becomes:

$$\begin{aligned} \text{ExV} - L &= \text{VE} + \text{FE} + \text{NI} \\ \text{NEV\%} &= (\text{dFE} + \text{NI} + L) / \text{ExV} \\ \text{NevP} &= \text{Nev\%} * P \end{aligned}$$

Where:

ExV:	ex-vessel revenue	dFE:	proportion of fixed expenses attributable to NEV
HP:	harvest pounds	NI:	net income
P:	ex-vessel price = ExV / HP	NEV%:	net economic value as a percent of ex-vessel revenue
L:	net lease payments	NevP:	net economic value per harvest pound
VE:	variable expenses		

The vessel category for longliner and the processor category for shoreside are used to approximate the profitability for the harvester and processor producer surplus for this example. The preponderance of landings by the chosen vessel category and the purchases made by the chosen processor category is justified. Table A shows the commercial per unit NEV estimate using the above derivation.

b. Regional Economic Impacts

Using the Alaska Fisheries Science Center model's locational expenditures and the previously described economic response coefficients, the REI per pound was \$1.30 for Alaska, \$2.79 for Washington and Oregon, and \$5.27 for total U.S. level in 2004. Adjusting for dollar value and net weight, the REI per pound in 2007 are \$1.90, \$4.07, and \$7.69 respectively (Table A).

2. Recreational Fishing

a. Net Economic Benefits

Changes in trip costs, expected catch rates, fishery regulations, and environmental quality affect the expected net benefit associated with sportfishing, and therefore the decision to participate in (take) a sportfishing trip. Criddle et al. (2003) focused on explanatory variables that are predictable or subject to management control such as expected catch through bag limits in order to make their modeling better suited for forecasting participation rate responses. They used a measure for compensating variation to show net benefit to consumers. It is an additional cost that, if added to the cost of a particular sportfishing trip, would leave the sport fisher indifferent between taking and not taking the trip. The estimated average daily compensating variation for fishing trips in 1997 was \$82.51 for Alaskans and \$118.88 for nonresidents (Table A).

They reported that reductions in expected catch reduce the compensating variation in two ways. First, the marginal sport fisher will drop out of the fishery as the expected benefits (in terms of catch) decrease, thereby decreasing the total net benefits of the fishery. Second, the net benefit of taking a trip is also reduced for all the sport fishers who continue to participate because each

trip produces less net benefit when the catch rate declines. For example (Table 4 in the study), a 30 percent reduction in expected catch is predicted to lead to a 57 percent reduction in total compensating variation. Conversely, changes in halibut abundance or management changes to policies that increase expected halibut catch-per-day by 30 percent could be expected to lead to a 48.4 percent increase in total angler welfare.

They also modeled for changes to REI per day. For example, a 10 percent decrease in expected halibut catches will cause a decrease of net benefits by 19.2 percent and 7.1 percent decrease in REI's measured by personal income. For a 10 percent increase in expected halibut catch-per-day, net benefits will increase by 18.1 percent and REI's will increase by 5.3 percent in personal income. The marginal effect of each of these impacts is smaller at higher catch levels and larger at lower catch levels, a consequence of the declining marginal value of catches and, therefore, participation.

Sportfishing effort in lower and central Cook Inlet during 1997 according to the ADFG annual angler survey was estimated to total 197,556 angler-days. Participation by nonresidents accounted for 44 percent of total days fished (86,970 angler-days). In the more expensive charter fishery, nonresidents comprised 65 percent of the total charter effort, while comprising just 28 percent and 37 percent of the private vessel and shoreline fishing days, respectively.

Weighting for the share of resident and non-resident charter-based angler days in 1997 and adjusting for dollar value during the intervening years since 1997, the average NEV per day is equivalent to about \$124 in 2007 (Table A).

b. Regional Economic Impacts

The average daily charter-based fishing expenditures for Cook Inlet halibut trips using 1997 survey data (Lee et al. 1998 and Herrmann et al. 2001) were reported to be \$137, \$129 and \$190, respectively, for local resident anglers, anglers from elsewhere in Alaska, and anglers from outside Alaska. Criddle et al. (2003) adjusted expenditures for resident spending and applied an I/O model to determine average total REI measured by personal income generated per angler day to be \$68 to the Kenai Peninsula regional economy. Adjusting for dollar value during the intervening years since 1997, the REI of \$68 per day in 1997 is equivalent to about \$85 in 2007 (Table A).

Extrapolating these REI results to all areas of Alaska is problematic. There may be different angler trip expenditures because the SE Alaska would attract more destination type trips while trip purpose to the Kenai Peninsula could have multiple purposes. The survey was based on all sportfishing and there may be a different mix of guided and unguided trips in SE Alaska. The Kenai Peninsula economy modeled in the studies is larger and more diverse than the SE Alaska economies. However, expenditures for fishing by non-residents may be higher in SE Alaska due to it being more remote. Smaller regional economies are less diverse, have fewer internal linkages between sectors, and have greater "leakage" to the outside world. Therefore multiplier effects in smaller economies tend to be less than in larger ones. If it is assumed that leakage in the Kenai regional economy is not significantly different than for the statewide economy, the

weighted average REI and NEV sportfishing per pound values could be used as statewide representative factors.

CONCLUSIONS

This testimony was a short primer about economic measurements and a brief discourse about whether adequate scientific data and models exist to generate economic descriptions. There is no single measurement to show economic effects and the Council needs to patiently absorb the meaning of descriptions when they are offered. It will ultimately be up to these decision makers to use the information to influence their actions. We have thoughts about other halibut fishery management issues being presented to the Council at this meeting, such as the efficacy of charter boat IFQ's, but feel Wilen and Brown (2000) and others have adequately explained the ups and downs of these issues.

The Criddle (2004) study and explanations in this testimony for available economic tools demonstrate that NEV and REI measurements can be calculated. Our own brief analysis showed that the movement of halibut from recreational to commercial harvests within the envelope of catch sharing amounts being considered by the Council will show a net reduction in NEV to the nation and reduction in REI within Alaskan economies. A more thorough application of available tools would be warranted, but at least we are demonstrating that the direction (positive or negative) and relative magnitude of the economic effects can be shown.

We suggest that the Council should be presented with quantitative NEV and REI information as well as derivations for their decisions about halibut fishing privileges.³ Both value-based and impact analysis, if properly supported with relevant and timely data, can provide useful and necessary information for understanding economic implications of decisions. Economists will sometimes argue that while such information will help inform decision makers, better data and modeling should be used to perfect estimates. This should not be an excuse from carrying through on modeling using best available data and modeling practices.

In general, we find there has been no statewide valuation or impact study conducted that is of adequate quality to conclusively evaluate economic effects for management changes to commercial and recreation halibut fisheries. It was encouraging to find that progress has been made for data acquisition in the recreational sector through the mandatory logbook reporting, albeit catch estimating procedures are not yet sufficient to make inseason management changes. That data will accompany commercial catch statistics available through the fish ticket and observer programs to provide an accurate catch accounting. However, neither the commercial nor charter boat sectors submit economic reports similar to those required under the crab rationalization IFQ program. Consequently, economic data collection and analysis have been sporadic and often spurred by available research funding and/or policy making emergencies. The conduct of studies and the use of non-standardized and non-specific data can result in "speculative" extensions which are unsupported by accepted scientific approaches. But we think that sufficient modeling research exists that quantitative analysis should be completed for proposals to manage the halibut fishery. The Council can use non-economic related objectives for their decisions, but quantitative economic effects descriptions should at least be available.

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1. *It our understanding that the Council is being presented with NPFMC (2008a and 2008b) documents to assist in the October 2008 decision making concerning the CSP and implementing GHL regulations in IPHC Area 3A. We also reviewed the economic information available for the Council's 2007 decisions for implementing GHL regulations in IPHC Area 2C in the NPFMC (2007c and 2007d) documents. We perused other NPFMC and NMFS EA/RIR/IRFA's that were prepared for the implementation of GHL's, charter permit moratoriums, and catch sharing plans using charter IFQ's. The level and extent of quantitative economic information has been about the same since the documents presented to the Council for the February 2001 meeting concerning a CSP.*
 2. *INR (2006) reviewed the difficulties in using economic analysis in decision making related to allocating fishery related mortalities between fish resource user groups. Their report used the example of the Columbia River spring Chinook fishery. Applicable literature addressing that fishery's allocation conflicts included Carter and Radtke (1986). Some unedited passages from the INR (2006) report are repeated in this testimony.*
 3. *Derivations of these measurements include benefit-cost analysis and cost effectiveness analysis. The derivations for benefit-cost analysis should be carefully examined. The direction of calculation may be positive, but there may be significant distributional effects for winners and losers. In these cases, compensation might become an additional consideration (Edwards 1990). Cost effectiveness analysis is a method to show least cost for selected objectives (such as lost harvest value) among alternatives, but has limited applicability if an objective is to show effects to Alaska economies.*

Economic Value Per Unit Parameters for the Commercial and Recreational Sectors

Commercial Sector

Economic Level	NEV								
	REI Harvester and Processor 2004 Per Pound		Processor			Harvester		NEV Per Pound	Total NEV Per Pound
	nominal	in 2007\$	Halibut Yield	Contribution to Profit Per Finish Pound	NEV Per Pound	2004 Ex-vessel Price Per Pound nominal	2007 Ex-vessel Price Per Pound nominal		
Alaska	\$1.74	\$1.90							
Washington/Oregon	\$3.72	\$4.07							
U.S.	\$7.02	\$7.69	79%	\$0.21	\$0.16	\$3.96	\$4.30	\$1.87	\$2.04

- Notes: 1. REI adjusted from 2004 to 2007 dollars using the GDP implicit price deflator developed by the U.S. Bureau of Economic Analysis.
 2. Ex-vessel prices in 2004 and 2007 were actual halibut landing prices in those years. The price in 2007 is estimated by averaging statewide prices by period.
 3. Pounds are based on net weight (dressed, headed and gutted).

Source: TRG (2007), NPFMC (2008a), NMFS RAM (2008).

Recreational Sector

Economic Level	Success Rate		Pounds Per Fish	REI				NEV			
	1997 Days Per Fish	2007 Days Per Fish		Per Day		Per Fish in 2007\$	Per Pound in 2007\$	Per Day		Per Fish in 2007\$	Per Pound in 2007\$
			1997 nominal	in 2007\$	1997 nominal			in 2007\$			
Alaska	0.28	0.69	19.0	\$68.00	\$85.39	\$59.31	\$3.12				
U.S.								\$98.52	\$123.72	\$85.93	\$4.52

- Notes: 1. The source study uses sportfishing expenditure data from 1997. REI are adjusted to 1997 dollars using the GDP implicit price deflator developed by the U.S. Bureau of Economic Analysis.
 2. The success rates are days per fish for charter boat anglers. The success rate in 2007 was a catch weighted average for the respective IPHC areas.
 3. Pounds are based on net weight (dressed, headed and gutted).

Source: Criddle et al. (2003) for NEV and REI per day and success rate in 1997. NPFMC (2008a) for success rate in 2007.

GLOSSARY

CGE	computable general equilibrium
Convention	Convention Between the United States and Canada for the Preservation of the Halibut Fishery of the Northern Pacific Ocean and the Bering Sea
CSP	catch sharing plan
GHL	guideline harvest level
HA	Northern Pacific Halibut Act of 1982
IO	input-output
IFQ	individual fishing quota
IPHC	International Pacific Halibut Commission
MSA	Magnuson Stevens Act
NEV	net economic value
NPFMC	North Pacific Fishery Management Council
PFMC	Pacific Fishery Management Council
REI	regional economic impacts

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Jim Martin
West Coast Regional Director
The Recreational Fishing Alliance
P.O. Box 2420
Fort Bragg, CA 95437
(707) 357-3422

NATIONAL OFFICE:
PO Box 3080
New Gretna NJ 08224
(888) 564-6732

Monday, September 22, 2008

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

RE: Support Recreational Halibut Fishing in Alaska for all Americans

Dear Chairman Olson,

The Recreational Fishing Alliance (RFA) is a national 501(c)(4) non-profit grassroots political action organization whose mission is to safeguard the rights of salt water anglers, protect marine, boat, and tackle industry jobs, and insure the long-term sustainability of our nation's marine fisheries.

Enclosed please find dozens of letters from our country's participants in the recreational halibut fishery in Alaska. We submit these comments to the North Pacific Fishery Management Council, under agenda items C1(b) and C1.(c) for its October meeting. We support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

We represent over 50,000 dues-paying members and the interests of millions of saltwater recreational anglers. We oppose leasing quota from the commercial IFQ sector because it would be cost prohibitive. We support a two-fish bag limit for the recreational sector until there is a true conservation issue with the resource.

Constraints to the recreational halibut sector at this time would only result in a transfer of fish to the commercial sector, not to the resource. All recreational anglers should be treated in a fair and equitable way. Dividing the sector into separate categories weakens us as an industry.

Thanks, in advance, for your attention. Please keep us advised of your office's position on this issue.

Sincerely,

Jim Martin
West Coast Regional Director
The Recreational Fishing Alliance

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

A group of my friends and associates have been halibut fishing on a charter boat out of Homer for a number of years now. As a result of many successful fun filled outings we have made this an annual trip and intend to do so in the future. The information regarding the potential restrictions to our take comes as a complete surprise to us. If this action were to take place we all will need to rethink our annual trips to Homer to fish. It is very obvious the big guys are trying to restrict and eventually drive all the little guys from this precious resource. I do not support their actions and strongly request you support the proposal recommended by the Charter Halibut Task Force. Again thank you for your attention and support for the Charter Fleet in Alaska which provides many of us from out of state an opprounity to enjoy this terrific opprounity.

Duane Cobb

Thank you
Mr. Duane Cobb
1737 Laporte Dr.
Roseville, CA 95747
dcobb@dcsnorcal.com
916 765 8418

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force. This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve

the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

My husband and I have traveled to Alaska for the last two years to Halibut fish and enjoy your beautiful state, spending \$9,000 per trip.

We oppose all leasing and "compensated reallocation" options which are based on "buying back" halibut harvest regulations. With the charters taking less than 10% of the halibut harvest, this does not seem to be a conservation issue but an unfair issue aimed at tourism and guided fishing! Are we not "equal recreational anglers"?

If the political agenda of the commercial fishermen and the NPFMC further restricts our opportunities to safely harvest our halibut, it will become more effective to spend our hard earned vacation money elsewhere.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mrs. Robin Mester
 7270 West Reilly Road
 Houghton Lake, MI 48629
 robin@arnies.com
 989-422-5847

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mr. Arthur Matteson
 170 Capricorn Drive
 Martinsburg, WV 25403
 arthurmatteson2000@yahoo.com

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mrs. Thom Clark
7577 Harlan St.
Westminster, CO 80003
kodi2250@comcast.net
303-650-8332

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Richard Cipala
9553 parrish ave ne
Otsego, MN 55330
rjc8265@msn.com
763-441-0442

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mrs. Sandra Ernst
 P.O. BOX 1675
 Mills, WY 82644
 wildro2@yahoo.com

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mr. Ira Ernst
 P.O. BOX 1675
 Mills, WY 82644
 iraernst@yahoo.com
 307-262-0874

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

It had been a dream of my husband and myself to come to Alaska. Not only to see this beautiful state but also to go halibut fishing. We are both in our mid 60's and finally were able to fulfill that dream this year. It was worth the wait all these years. We were not only impressed with the vista's and the people but the icing on the cake was the halibut fishing. We had such a wonderful time that we are dipping into our retirement savings to come again next year. Especially to do more fishing. Unfortunately if they reduce the catch limit to less than 2, it would be cost prohibitive for us to even consider. We have to

believe that tourism brings a great deal of revenue into the state - I know we did. But if it isn't equitable to go fishing, we could not justify a return trip.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mrs. Diane Westmore
po box 2053
Eureka, MT 59917
ednred@hotmail.com

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Carl Zimmerman
26c Cyprus Lane
Old Bridge, NJ 08857
czimmerman123@hotmail.com
732 679 2816

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Thank you
Mr. Kenny Redin
15758 Ashley Manor
San Antonio, TX 78247

kredin@texassportingjournal.com

I support keeping the halibut limit of two for fishing charters
Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issues

If the limit is reduced to one fish, there are many people like me who will not be able to come to Alaska fishing any more. Fishing is \$300 per day and getting two keep two fish helps offset the costs. We do not purchase commercially caught halibut, so it will not help them by reducing the limit of the charter boat captains.

Sincerely

Mr. Claude Kureger
Box 746
Forsyth, MT 59327
cnkrueg@rangeweb.net
406-346-2234

We would like to keep the two halibut limit for charter fishing in Alaska.

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

We are from Montana, and it costs alot for us to come to Alaska fishing. However if we can catch two halibut daily plus our other limit, and bring home some of that delicious halibut, it very much helps offset the cost. If the second fish that we wouldn't be allowed to keep simply goes into the commercial fisherman's net, we would strongly urge you to leave that fish for us to catch. We are only able to afford to come once every few years and we love the halibut and enjoyed catching them. Only catching one per day makes no sense at all. We would like to see the Charter boat captain also be able to take a fish home once in a while so that he can also enjoy catching this fine fish also.

Sincerely
Mrs. Claude Krueger
box 746
Forsyth, MT 59327
cnkrueg@rangeweb.net
406-346-2234

Support Recreational Halibut Fishing in Alaska!
Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Just this July, my wife and I brought another couple up to Alaska for their first time.

I fished in Alaska more regularly when I lived there but still consider fishing in Alaska worth all the travel and expense. I was very disappointed to only be able to keep and send home two halibut the day we went fishing this past July.

To go back and only keep one fish is ridiculous from the point of a sportsman. Please don't let all the commercial fishing not only keep such a huge majority but probably ruin the fishing grounds as well. Where is the promise of wilderness for the citizens of this country.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Harry Nygard
2743 N. Wolcott Ave.
Chicago, IL 60614
hknfish@yahoo.com
773-665-7240

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mr. Jean Sachs-Nygaard
 2743 N. Wolcott Avenue Unit # 39
 Chicago, IL 60614
 jlssadie@aol.com
 773-665-7240

Support Recreational Halibut Fishing in Alaska!
 Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue. If the charters go to 1 halibut per day, that would keep all of us from going to Alaska. The high cost of getting there would not be worth it. We have been going there every year, for a lot of years. On the average we spend 4000. per person

Sincerely
 Mr. paul and jim pugliese
 535 east main
 price, UT 84501
 tirekinginc@emerytelcom.net
 435 650 9635

Dear Chairman Olson,
 As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter

fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I insist that the North Pacific Halibut Commission be able to keep the two fish limit for halibut charters.

Sincerely
 Mrs. Connie Greig
 626 North Victor Rd.
 Big Lake , AK 99652
 mrgreig@mtaonline.net
 907-892-2712

Greetings from Mojave, California - Please support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,
 As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.
 This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

My first experience fishing for halibut was in 2006 when we visited our friends Carole and Corky Meyers at the Treetops Fishing Lodge in Seldovia. WOW! What a fabulous experience and what a wonderful and beautiful state! I have never eaten so much fish in my life! I'm hooked!

My husband and I had a great time and learned that charter fishing in Alaska is an important part of Alaska's tourism industry.
 We came to Alaska in Rob Scherer's Starship, along with Dick and Kris Rutan. It was a trip we tell everyone about. Plus, we tell everyone about the fishing and how they need to go enjoy the experience.
 I urge a 2-halibut per day limit per person to help keep Alaska's tourism industry healthy!

Sincerely
 Mrs. Catherine Hansen
 P. O. Box 169
 Mojave, CA 93502
 propturns@antelecom.net
 661 342.0604

From the High Desert in California - Please support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

We understand that Charter Fishing is important to Alaska Tourism. We have friends with a fishing lodge in Seldovia.

We urge a 2-halibut per day limit per person to help keep Alaska's tourism industry healthy!

Respectfully yours

Mr. Albert Hansen

P. O. Box 112

Mojave, CA 93502

mojojets@antelecom.net

661 824-2889

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Specifically, I ask that you vote to maintain the 2 halibut limit for recreational fisherman. Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely

Dr. Robert Holloway

145 James Place

Maitland, FL 32751

robhollowaymd@gmail.com

407 6228774

Recognize the real value of sport fishing to Alaska.

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

As a sport fisherman I as well as uncountable others happily contribute money to the support of the recreational fishing industry in Alaska. Without a justifiable return in the form of reasonable catch I fear that Alaska's Sport Fishing Industry will suffer. We have learned this lesson in the Columbia River Basin. There is much more economic and personal benefit to be derived from sport fishing than in sustaining growing quotas for commercials. Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely

Mr. Jim Basler

168 Sundown Dr.

Woodland, WA 98674

jbasler@osmose.com

Please listen and support recreational halibut fishing in Alaska!!!!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks for reading this letter and thank you for your support.

Respectfully yours

Mrs. Laurie Milne

187 marlboro Road

Yardley, PA 19067

lemilne@comcast.net

215-431-6404

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I am a sportsman that comes to Alaska to fish for halibut, I will not return if this catch limit of one fish is imposed, please keep me advised as to your position on this matter....

Sincerely

Mr. Ken Munro
40641 Alondra Dr
Murrieta, CA 92562
navybuff@gmail.com
9512056344

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely

Mr. John Spratt
1241 Crabapple Cir
Watkinsville, GA 30677
jgspratt@bellsouth.net
706-769-2364

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I feel recreational fishing is a God given right. I can,t believe what uncle Sam is doing to us. Not all of us can afford our own private lake like Pres Bush, were we fish were ever and when ever we would like just like all citizens used to do. Please also try to bring some common sense back to fishing regulations along the Pacific coast, especialy the rock fish in California. This idea of only fishing shallow water and never fishing deep water is not to smart in my opinion. Putting all the blame on Cow Cod, Canary, and Yelloweye rock fish is a joke, unfortionatly it,s not funny. I have fished the California Central Coast since 1963 Cow Cod and Yelloweye have never been a big part of the catch why should things be different now. The Canaries have realy come back sinse the deep water closers of 2000. It is about time to give the public back some deep water. If uncle Sam wants the Canaries that bad we can let them go and in return we would be giving the Cabazon, Seatrout and gophers the brake they deserve. Most recreational fisherpeople have enough sense to mix up their fishing "not keep hitting the same spot". Uncle Sam should do the same!!!!

Sincerely
 Mr. James Pigula
 10684 Culbertson Dr.
 Cupertino, CA 95014
 lh204u2@sbc.global.net
 (408) 725-8292

Please keep halibut fishing for recreational anglers.

Dear Chairman Olson,
 As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

It has been stated, in Alaska, commercial fishing is allocated 89% of the halibut resource (including bycatch in the Pollock trawl fishery). I am concerned reducing recreational bag limits and allocating un-claimed stock from the recreational sector will result in over-stressing the fishery. The approach of the commercial fishing industry is to take all fish the PFMC deams available, including left over rec. allocations. This clearly has led us to

terrible consequences in the West coast fish stocks (salmon, anchovies, deep and near shore rockfish.)

It is in my hope halibut fishing due to its's commercial value and popularity on the table, won't be another fish story of the past.

Please keep me advised of your office's position on this issue.

Thank you
 Mr. John Hayes
 1313 Bosworth Street
 San Francisco, CA 94131
 diverhayes@gmail.com
 4153412300

Support Recreational Halibut Fishing in Alaska!
 Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Myself and five other anglers just returned from our fourth trip to Alaska to fish for halibut and cod. We traveled from Florida and Georgia and spent a week in your great state. We spent four days with Seidovia Fishing Adventures catching, and releasing, halibut, keeping our two per person limit. We were successful and able to bring fish home for ourselves and our friends. The trip was expensive, costing well over \$4000 per person, not including airfare. It is not a trip that can be done on a regular basis and therefore, it is great to be able to take home fish that will last several months. If your commission begins setting such restrictions on recreational fishermen, limiting them to only one halibut per day, I firmly believe it will curtail the number of fisherman willing to travel so far to fish, having a very negative impact on the livelihood of many in Alaska.

I am an avid fisherman here in Florida and we have restrictions as well when stocks are threatened. Reasonable quotas for both recreational and commercial fisherman are needed, but the impact the recreational community has on the fish stock is minor compared to commercial interests. Shutting out the recreational fisherman is not the answer and serves no real interest except for the commercial side of the industry.

Please reconsider your one halibut fish limit and the economic impact it will have on Alaskans.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Respectfully yours
Mr. Tony Dobies
6067 Bay Lake Drive
St. Petersburg, FL 33708
tdobies@tampabay.rr.com
727-742-0744

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Respectfully yours
Mr. Larry Green
1699 165th Trail
Mondamin, IA 51557
cag@iowatelecom.net
712-646-2320

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Ms. Rosemarie Spinelli
3145 S Fraggie Rock Ct
Palmer, AK 99645

icehole@gci.net
907-745-7014

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

I believe that lowering the bag limit of halibut to one, this would put many charter boat captains out of business, as many recreational fishermen chartering boats will not go out for only one halibut. Halibut fishing is of the many draws to the Great State of Alaska.

Sincerely

Mr. Fred DeBois

3092 Sunny Creek Ct.

Hudsonville, MI 49426

shredder@iserv.net

(616) 262 1643

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue. I have fished Alaska's great waters for halibut. I believe that there are a lot of people that travel to Alaska to fish that will not if the limit is one halibut. That will greatly reduce the tourism trade to Alaska and the commercial fisherman will not make up that loss.

Thank you

Mr. dan tietsort
1416 w orchard
nampa, ID 83651
gemgun@yahoo.com
208-467-9576

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I had a great time on my Alaska trip this summer. It was my first time to fish for halibut and I was able to catch two that were of any size, maybe 15 pounds. It was not a good day fishing. I am looking forward to another trip and more halibut fishing. Maybe next time I can catch bigger ones.

I will ONLY go if I am allowed 2 fish.

I will NOT go back for 1 fish.

89 percent is more than enough for the commercial fishermen. Sounds like they want more. That will stop us from spending \$6000 next year like we did this year.

Keep fishing open to sport fishing.

Sport fishing brings lots more money to the residents of Alaska than the same fish caught by commercials.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mrs. Virginia Kesler
5900 E. Marita St.
Long Beach, CA 90815
ginikesler@bigfoot.com
562 596 3691

Support Recreational Halibut Fishing in Alaska!
Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I had a great time on my Alaska trip this summer. I fished one day for Halibut, but only kept 2 15 pound fish. It was not a good day fishing. I am looking forward to another trip and more Halibut fishing.

I will ONLY go if I am allowed 2 fish.

I will NOT go back for 1 fish.

89 percent is more than enough for the commercial fishermen. Sounds like they want more. That will stop me from spending \$6000 next year like I did this year. Keep fishing open to sport fishing.

Sport fishing brings lots more money to the residents of Alaska than the same fish caught by commercials.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mr. Don Kesler
 5900 E. Marita St.
 Long Beach, CA 90815
 donkesler@bigfoot.com
 562 596 3691

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Gov. Letting the commercial fishermen take over 90% of the halibut in Alaska is the most ridiculous thing I have ever heard. In the 80's I spent 6 years on long line boats and know how efficient they are. For the last 8 years 7 of us vacation in Seward for 7 days. I spend about 5,000 when it is all said and done. 35,000 for our group alone in your economy each year. If the commercial take is not reduced, and the limit goes to 1 halibut

we will not be back. Thank you, this is common sense., I viewed your speeches and was very impressed, we will see if you do as you say and not cave into big business and make a good decision for your states economy. Thank You, Dave Erickson

Thank you
Mr. Dave Erickson
33003 Oakdale Ln
Crosslake, MN 56442
daveeee@sternindustries.com
218-824-8912

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Randy Talvi
2630 E. Tamarack
Wasilla, AK 99654
talvi@mtaonline.net
907-376-0401

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot Afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue

It seems that more and more government wants to get away from revenue gained by a strong recreational fishery in favor of commercial. It's a, no brain er, the money gets to spread out if it goes to rec fishing, too many regular folks would benefit. If it goes to commercial then a few fat cats benefit. Politics as usual .

Respectfully yours
Mr. David Lemon
, AK
Customrods@yahoo.com

Support Recreational Halibut Fishing in Alaska!
Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I have fished from Sitka, and enjoyed the benefits given to recreational fishermen. I would reconsider many more trips to Alaska, but cuts in the recreational take will begin to weigh in on my decisions to return. As someone from out of state, CA, I hope the commercial fishery greed across the world will be managed to a point that always keeps the recreational fisherman in mind, in a fair manner.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. James Owens
603 Rockaway Beach Ave
Pacifica, CA 94044
owens@gene.com
6502969378

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I am not only a recreational fisherman, but a charter fishing business owner/operator as well. I feel that this option is the only "fair & equitable" choice for the recreational

fishing sector as a whole. There should never have been any distinction made between charter and non-charter sport fishermen.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Respectfully yours
Ms. Stacey Mitchell
P.O. Box 2142
Valdez, AK 99686
auroracharters@valdezak.net
907-835-2140

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Philip Westrick
po box 2464
westport, WA 98595
ultimatecharters@yahoo.com
3606482386

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

My family and I as well as members of our fishing club have had many voyages and enjoyed the Alaskan fishing. With salmon limits also limited curtailing the halibut catch would cause some of our group to give a second thought to these trip. Which are not inexpensive.

Yours truly
Sister Eric Rogger
22625 Westridge Road
Los Angeles, CA 90049, CA 90049
wstridge@aol.com
310 476-5936

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.
This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

I will be 60 years old this November. I learned to fish and respect for our natural resources from my grandmother at the age of 3. I remain an avit fisherman and love the wonders of nature. I have seen many changes in our environment over the years, and note that damage has been primarily by industry.

I have introduced many children to the miracle of life through fishing and hope to teach my grandkids to fish someday.

Please consider the long time impact it would have on future generations that would not be able to experience one to oldest sports known to man.

Thank again for your consideraiton.
Sincerely
Mr. Rodney Boudreaux
1350 N. Marine Ave#204
Wilmington, CA 90744
gldnrod2@ca.rr.com
3108304161

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

I have visited Alaska in the past. Last rip was in 2003. I plan on returning. If you take the opportunity of catching Halibut away I will have to reconsider my plans. Going fishing was one of the biggest reasons I had for going. If that is not available then the largest reason to go is gone.

Sincerely

Mr. Michael Weber
5751 Washington Ct.
Lake Oswego, OR 97035
mikelw@comcast.net
503 975-6919

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely

Mr. James Virden
13195 Nicola Rd
Apple Valley, CA 92308
mikevird@hotmail.com
760 488 5039

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

1. All of my family are Alaskan residents and like to eat halibut a lot. We prefer to eat the fresh fish we catch ourselves. Going fishing on a charter boat is the safest way for my family to access halibut for us to eat. Why should we be discriminated against and have a lesser daily bag limit because we choose to go halibut fishing on a charter boat? If we could go fishing for halibut on a private boat (non-charter) we would legally be allowed to fish under more liberalized regulations. For example: A two halibut daily bag limit for non-guided anglers versus the proposed one halibut daily bag limit for guided anglers! And in SE Alaska there is a size restriction on halibut for guided anglers and not for unguided anglers! Why are we treated differently depending on our choice to access this public resource? Seems to us all recreational anglers - guided and/or unguided should be treated equally! Why should guided anglers be under more restrictive regulations than un-guided anglers.

2. Fishing for halibut can be quite risky in small private boats. Going out on charterboats is the safest way for my family to catch halibut. We know we will be much safer on a charterboat that meets U.S. Coast Guard regulations and we do not have to worry about being safe while we are having fun catching our halibut. Many folks, resident and non-resident, can't afford to own a boat either.

3. The economic viability of the recreational sportfishing industry and the volume of jobs this specific industry creates, are extremely vital to the economy of small Alaskan coastal communities. With the current state of our economy, it would seem prudent for the State of Alaska to want to nurture and maintain the recreational sportfishing industry by leading the way with regulations that treat all anglers equally - not divisively!

4. Another economic benefit for the state would be less cost for enforcement.

Please listen to what all the recreational fishermen are asking you to do. Thank you for reading my comments. I hope you will keep me advised of your office's position on this issue.

Sincerely
Miss Karina Belcher
P.O. Box 1505
Sitka, AK 99835
apcinc2008@hotmail.com
907-747-4902

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely

Ms. Jane Nickens

4710 Durham Ct.

Rocklin,, CA 95765

janenickens@hotmail.com

916-276-5517

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely

Mr. Gary Ostenberg

1844 Newcastle ct

Walnut Creek, CA 94595

gostenberg@aol.com

925 937 6944

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter

fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I strongly believe that it also makes sense from an environmental standpoint as well as avoids impact to the City's and Town's in Alaska who derive direct benefits from the visiting sport's anglers to your beautiful State.

Thank you
 Mr. Fred Tschopp
 4193 Dan wood Drive
 Westlake Village, CA 91362
 bigbearsix@aol.com
 805-496-2594

In support of recreational halibut fishing in Alaska

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I have fished Alaskan waters before and plan to again, a big part of that draw is the healthy halibut fishery. It would greatly effect my choice as a recreational angler should the bag limit be reduced only to have those same fish still being taken, but instead by commercial anglers. I do support commercial fishing and recognize its importance, but also realize that a large majority of the people I know who have visited Alaska have gone there for the phenomenol fishing. I would hate to see that change, as Alaska is such a beautiful and important American destination. Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mr. Mike Cimmarrusti
 3100 Military Ave
 Los Angeles, CA 90034
 Mowglislife@aol.com

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter

fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

I just returned from your beautiful state and had the privilege and pleasure to fish for halibut and salmon. As long as the resource can support the current limits, I implore you not to reduce the sportfisher's limits. Frankly who could afford to make such a journey and not be able to bring home several fish?

Sincerely
 Dr. Fredrick Wilson
 1999 mowry ave
 fremont, CA 94551
 fswisme@aol.com
 5107962191

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
 Mrs. cheryl babineau
 210 OLaughlin Rd
 santa Cruz, CA 95065
 alibirods@sbcglobal.net
 8312470535

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

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fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.
Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. David Babineau
210 OLaughlin Rd
Santa Cruz, CA 95065
davidbabineau@sbcglobal.net
8312470076

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Tyrus M. Gerlach
1500 eastman ln
petaluma, AK 94952
tyrusg@mac.com
(707) 570-7147

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

As a repeat fishing visitor to the Alaska Fishery and one of my favorite fish to be put on the table a one fish limit would mean that I will take my fishing dollars and spend them in another state!

Respectfully yours
Mr. Ronald Wilson
632 Carson Ave.
Modesto, CA 95357
rwilson632@yahoo.com

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

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Respectfully yours
Mr. Ronald Wilson
632 Carson Ave.
Modesto, CA 95357
rwilson632@yahoo.com

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

This should be a very easy decision. When my girlfriend and I went to Alaska, it cost me over \$10,000, and we brought home about a 100 lbs of fish. One hundred dollars a pound

to Alaska. What do Commercial Fisherman bring to Alaska per pound? We fished Halibut out of Ninilchik and Salmon on The Kenai

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Milo Vukovich
10024 yukon river way
rancho cordova, CA 95670
mvotb@sbcglobal.net

Support Recreational Halibut Fishing in Alaska!
Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Michael Johnson
1375 Montecito ave #42
Mountain View, CA 94043
phishbelly@aol.com
650-967-6984

Support Recreational Halibut Fishing in Alaska!
Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Ms. Audrey Stephens
43961 K-Beach Road Suite E
Soldotna, AK 99669
ucida@acsalaska.net
907-260-9436

Support Recreational Halibut Fishing in Alaska!

Dear Chairman Olson,
As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Jim Martin
POB 2420
Fort Bragg, CA 95437
flatland@mcn.org

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I travel to Alaska from Pennsylvania to fish your beautiful state roughly every other year. Besides fishing for many varieties of Salmon I take at least one Halibut trip each time. The Halibut trip is very important to my visit because of the amount of Filets I can bring back - my entire family loves Halibut. I usually bring at least two friends - sometimes we are in your state as a party of 6. Please consider the economic impact of all of the recreational anglers who visit your state as paramount. I am certain that the recreational fishery is much larger and brings more revenue than a handful of commercial fisherman.

I would like to continue to fish Alaska but if the restrictions become too great I will be forced to spend my time elsewhere. I would consider that a great loss as I look forward to my trips to Alaska.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Tony Kratowicz
111 S. 8Th Street
North Wales, PA 19454
tkratowicz@comcast.net

MY WIFE AND I WENT TO HOMER THIS YEAR AND SPENT OVER 12
THOUSAND DOLLARS
ON OUR TRIP. 3600 IN HALIBUT TRIPS. IF WE COULD ONLY KEEP ONE FISH
WE WOULD

North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I have been a regular visitor to Sitka Alaska for the past 12 years. With the restrictions imposed this year regarding King salmon and the potential bag limit changes on halibut I am reconsidering plans for fishing in Alaska in the coming years. My party and I spend a substantial amount of money during our visit each year including dining out, buying sporting equipment and gifts for our family. I suspect the financial impact of losing the recreational fisherman revenue streams on Sitka and other cities throughout Alaska would be substantial.

Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Mr. Gregg Harmon
3816 130th Ave NE
Bellevue, WA 98005
gregg_harmon@hotmail.com
425 830 3413

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I am a non-resident who annually visits Alaska for fishing and spend over \$3000 while in the state. A penalizing limit on halibut along with necessary restrictions on king salmon will stop my trips to Alaska.

Please approve the CHTF proposal.

Sincerely
Mr. Donald Kayser
8216 E. Sands Dr
Scottsdale, AZ 85255
don@kayser.org

Support charter and recreational halibut fishing
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

This proposal would set a consistent bag limit for all recreational anglers and provide any easy-to-enforce harvest control. It would preserve the economic viability of the charter fleet in Alaska, promoting safety in the fishery and access for those of us who cannot afford to bring our boats to Alaska.

I have personally fished the waters of SE Alaska for the past 12 years along with a group of other individuals. Charter fishing in Alaska is a great experience for all involved and brings a tremendous sum of money to the local communities. However, as catch limits continue to decline for charter fisherman, despite already enormously disproportionate percentages going to commercial fisherman, I would likely be inclined to discontinue my vacations to the communities of Alaska. This would be an unfortunate turn of events if the economic downturn from lost revenue from charter fishing for Alaska occurs. It makes no sense to drive away tourism in the state of Alaska and bolster the commercial fishery especially since a decrease in the charter halibut catch would not conserve ANY halibut. I appreciate your attention to this matter.

Sincerely
Mr. Jey Ponti, PT, MS
258 Goat Trail
Whitefish, MT 59937
jey Ponti@hotmail.com
406-756-7878

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

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Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Sincerely
Ms. amy hashiguchi
2016 Komo Mai Drive
Pearl City, HI 96782
ahashiguchi@hotmail.com
8082531226

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

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Thanks, in advance, for your attention.

Thank you
Mr. Steven Yuasa
6818 83rd street east
puyailup, WA 98371
reelfast1948@gmail.com

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

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As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

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Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Thank you
Mr. Tyler Scott
155 Rankin View Lane
Selah, WA 98942
arowelectric@fairpoint.net
509-949-6329

Support Recreational Halibut Fishing in Alaska!

Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

As a recreational fisherman, I support the proposal submitted to the North Pacific Council by the Charter Halibut Task Force.

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Thanks, in advance, for your attention. Please keep me advised of your office's position on this issue.

Your constituent
Mr. Ryan Bump
66665 Haleiwa Rd.
haleiwa, HI 96712
bumpr@blazemail.com
206 2454115

Support Recreational Halibut Fishing in Alaska!
Eric Olson, Chairman
North Pacific Fishery Management Council

605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

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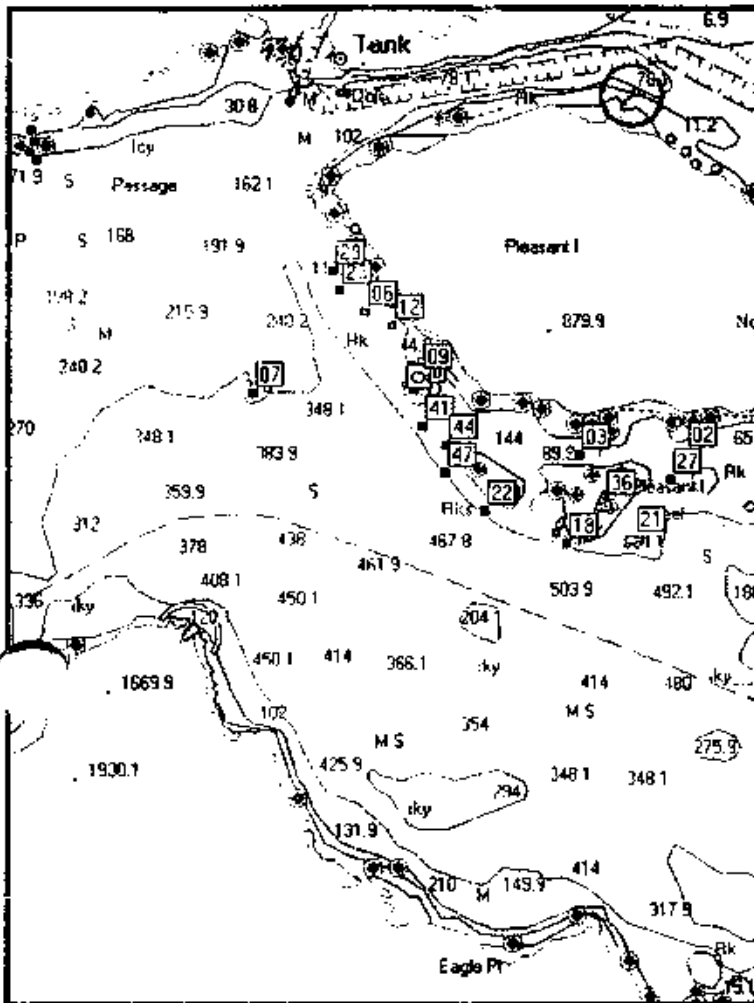
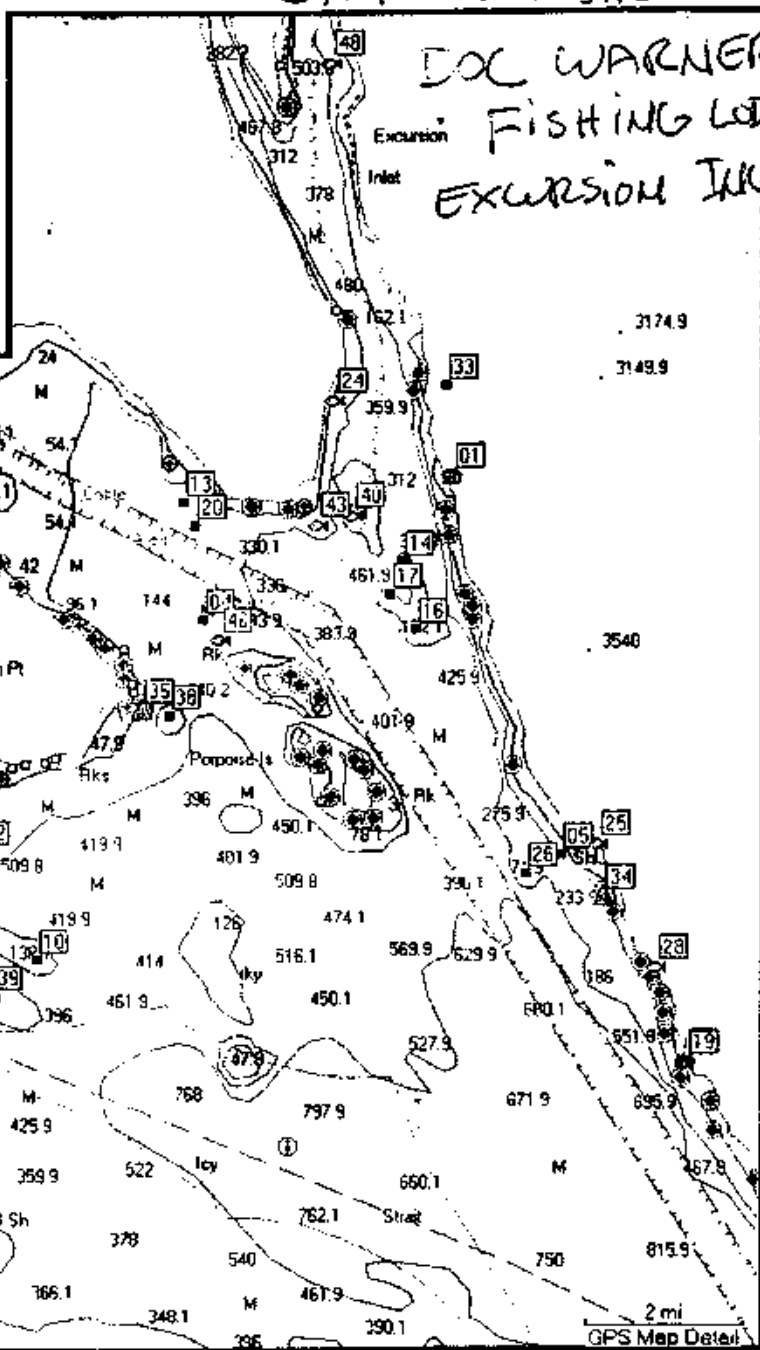
I have been sport fishing in southeast Alaska since 1991 and I have been having a hard time staying abreast of all the changes that have been installed in recent years. It seems

that the charter fishing industry is headed for extinction, the average charter fisherman in my opinion does add a lot to the economy when they are in Alaska. They eat out buy food and liquor so without this the local economy would suffer. It appears that the commercial fisherman have all of the lobbying power. Thank You Bruce Biesold

Thank you
Mr. Bruce Biesold
941 Rodeo Road
CleElum, WA 98922
bruce@merlino.com
206 450 3431

JIM MACKOVIAC

No.	Name	GPS Position	Depth
39	PIXIE	N58 16.942 W135 34.949	92
40	RUSSIAN HUMP	N58 22.364 W135 27.357	135
41	S175	N58 19.508 W135 42.101	175
42	SISTERS HUMP	N58 12.390 W135 15.819	284
	STAGS	N58 22.257 W135 28.075	145
	THE MELTING POT	N58 19.305 W135 41.602	140
46	VIDEO HUMP	N58 20.973 W135 30.135	90
47	WATER	N58 18.987 W135 41.657	180
48	WATERFALL	N58 27.425 W135 27.751	190



No.	Name	GPS Position	Depth
1	DOC WARNER	N58 22.801 W135 25.279	
2	BLACK ROCK	N58 19.193 W135 36.609	
3	CANAL	N58 19.186 W135 38.837	133
4	36	N58 21.197 W135 30.481	180
5	CRAB	N58 18.537 W135 23.042	25
6	CROWDED	N58 20.795 W135 43.282	150
7	DEEP	N58 19.894 W135 45.626	250
8	DELTA STREAM	N58 18.670 W135 22.283	
9	ALLEY	N58 20.066 W135 42.167	170
10	DOUBLE ANCHOR	N58 17.381 W135 33.982	165
by 44	FEHRWELL	N58 19.273 W135 41.320	130
12	FIREHOLE	N58 20.638 W135 42.745	250
13	G140	N58 22.511 W135 30.854	140
	GATOR HUMP	N58 21.866 W135 26.347	266
	GATOR TAIL	N58 21.070 W135 26.032	176
17	GATORMOUTH	N58 21.466 W135 26.574	200
18	GREEN BOUY	N58 18.177 W135 39.080	
19	GREY CABIN	N58 16.186 W135 20.455	
20	GRANCH	N58 22.249 W135 30.626	170

No.	Name	GPS Position	Depth
21	GRUMPY	N58 18.232 W135 37.701	160
22	HAM BONE	N58 18.558 W135 40.799	210
23	HER SPOT	N58 21.044 W135 43.824	145
24	HIDDEN WATERFALL	N58 23.646 W135 27.717	300
25	HOME SHORE	N58 18.670 W135 22.283	
26	HOME SHORE KNOB	N58 18.339 W135 23.767	80
27	JACOB	N58 18.906 W135 36.931	80
28	LOG DUMP	N58 17.252 W135 21.097	
29	LULU	N58 21.274 W135 43.959	160
30	MAROON	N58 19.925 W135 42.272	90
31	MARYS FLAT	N58 15.894 W135 51.717	210
32	MATTS HUMP	N58 18.598 W135 35.241	185
33	NEVA CREEK	N58 23.817 W135 25.377	
34	REEF	N58 18.077 W135 22.131	
35	REEF	N58 20.193 W135 31.772	
36	REEF	N58 18.664 W135 38.310	
37	NO MANS LAND	N58 17.222 W135 53.671	190
38	NOON POINT	N58 20.128 W135 31.209	



Gustavus Inn

AT GLACIER BAY

David and JoAnn Lesh, Innkeepers
Wed, Sep 24, 2008

To: Eric Olson, Council Chair
From: David and JoAnn Lesh

Re: support for regulating charter halibut catch

Dear Mr. Olson,

This is a letter to ask your support for regulating the halibut catch of the commercial guided charter fleet along with the long line catch. We are ex long liners who purchase halibut for our restaurant, host charter sportfishing guests as part of our business and sport fish locally for our own family's consumption. The charter fleet and their resultant halibut catch have grown tremendously in the last few years and there are no reasons to believe this growth will not continue.

As the owners of the Gustavus Inn since 1980 we have watched the local charter fleet grow from one boat to about 30 now. Most of this growth has been over the last 10 years. The first boats were slow displacement hulled boats fishing within 10 to 15 miles from Gustavus. Now all are small, fast and fish up to 80 miles away. The latest addition to the fleet is 40 foot speed boat with twin 250 horsepower outboards and it is able to fish from Gustavus to the Outer Coast easily.

In addition, improvements in rods, reels, fishing line, electronics and hooks allow the fleet to target halibut in areas out of reach just a few years ago. They are able to fish deeper and in much more current than ever before.

Assuming these trends continue, the halibut catch of the charter fleet will continue to grow exponentially. Their catch needs to be regulated as a component of the total commercial halibut catch. Local impact of the increased catch also needs to be considered so local residents fishing from skiffs are able to fish to feed their families.

Sincerely,

David Lesh

JoAnn Lesh

David Lesh
JoAnn Lesh

To: Eric Olson
Council Chair
North Pacific Management Council

Date: September 24, 2008

Re: Halibut quotas for commercial charter fleet

Dear Sir:

I am writing today as a local sport/subsistence halibut fisherman. I have lived in Southeast Alaska for over 40 years and in Gustavus for 35 years. In the last 10 or so years, I have witnessed the explosive growth of the commercial charter fishing fleet in Icy Strait. It is hard to believe that these people are unregulated except on a voluntary basis. Their present share of the halibut catch is too large in relation to that of the regulated commercial halibut fishery. We subsistence and sport fishers are having to travel far from our community by skiff in order to be able to catch anything for our tables anymore. In fact, it has come to the point where my wife and I no longer fish at all because our local halibut has pretty much disappeared. This I attribute to the incredible overfishing of our waters by the commercial charter fleet.

I would ask that the Council consider putting in place verifiable catch restrictions on that fishery.

Thank you for your attention to this matter.

Hayden Kaden
Hayden Kaden
P.O. Box 138
Gustavus, AK 99826
kaden@prodigy.net.mx

To: Eric Olson, Council Chair
From: Paul Barnes, PO Box 155, Gustavus, AK 99826
Melissa Senac, PO Box 337, Gustavus, AK 99826

Dear Mr. Olson,

I am writing to urge you take immediate action to establish a charter sector catch limit that's regulated as a component of the total commercial halibut catch tied to abundance. It is time we recognize the charter sector as a commercial operation. Their catch limit should not exceed the current GHL and **MUST** be tied to abundance so this viable resource that feeds my family and friends in the community of Gustavus and the 2C area will continue.

We have lived in Gustavus for 18 years and watched the charter fleet increase at an alarming rate, especially over the past 10 years where the fleet totals are now over 30 boats. This year alone, the charter businesses and fleets continue to grow in Gustavus with new buildings going up and new fast vessels added. Why wouldn't these operations grow? There's been no repercussion to their overfishing. They have not restricted their fishing efforts due to the decrease of the abundance in 2C. Quite the contrary, they have increased their catch. How is that fair? Large fish are being targeted with no remorse or responsibility for the future of the halibut resource. This is creating animosity among many towns' people knowing the charter fleet will continue to fish irresponsibly until some action is taken.

I am truly concerned with the one catch limit since the GHL has increased at an alarming rate even after the 2 fish limit was implemented a few years ago. In fact, a bed and breakfast operator told me that approximately 50% of their clients said they didn't even bother with the under 32" fish and targeted the one big fish/day. We have friends that work at the airlines in Gustavus and report an alarming number of fish boxes leaving our airport; all headed to one destination at times.

Again, the charter sector catch limit **MUST** be no higher than the current GHL. Instead, it's time it be expressed as a percentage and **MUST** be tied to abundance. We urge the Council to consider allowing the charter sector to invest in the halibut resource if the current GHL is exceeded, as setline fishermen have done, by leasing a limited amount of quota share. It's time to take responsibility!

As a setline fisherman and deckhand in 2C and 3A areas for 30 years, my partner and I have willingly accepted the 43% quota reduction to conserve the halibut resource. We live very simply and love and respect the ocean and its resources, but have felt a tremendous impact financially. The charter fleet is taking advantage of the current situation due to un-regulation and lack of enforcement. Please change this glaring loop hole.

Sincerely,

Paul Barnes



Melissa Senac



To: Eric Olson
Council Chair
North Pacific Management Council

Date: September 23, 2007

Re: Halibut

For the record, I am a 40-plus year resident of southeast Alaska and have lived in Gustavus, (Icy Strait) since 1972. Tonight my husband and I went to a fisherman friend's for a potluck. (Interesting to note, the usual concoctions of halibut, abundant in years past, were not on the table.) In attendance were a number of old-time residents, inn owners, subsistence fisherpeople, school teachers, and young folk. We were discussing the harvest of halibut in our community. Through very helpful phone conversations with people much more knowledgeable than I, regarding lots of management policies and committees with capitalized initials I can no longer remember, we learned a bit about fisheries management in our community.

There are things I believe that you folks need to know about our local needs and observations over the past years. My husband and I, with our small daughter in tow, used to enjoy fishing for halibut at the mouth of our river and toward the Pleasant Island area. At least five years ago, we hung up our family halibut poles in dismay over watching the growing Gustavus charter fleet zoom off in the morning and the "un-guided" bozos in rent-a-skiffs swarming the shallows of nearby Pleasant Island.

Over the past 10 years, I have watched our community dock every afternoon about 4:00pm become over run by a swarm of giant charter captains, fish photographers, fish cleaners (well, hardly the word "cleaner"), tote runners, and the dock road totally packed with charter vans picking up valiant out-of-state fishermen, fish packers, etc. Our family tries very hard to avoid our local beach between 4:00 and 6:00pm.

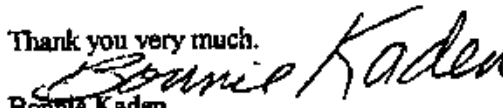
When we visit our friends in Elfin Cove and other Icy Strait communities, we see the same scene replayed. This summer, I noticed something pitiful. Large breeding mommies and tiny babies were being strung up for photographs along side their proud captors. I kept telling myself that something was wrong with this, so we looked up the regulation that said that indeed the second catch could be taken "under 32 inches." Well, shame on you. What kind of management would allow the destruction of the breeding stock along side the depletion of the young?

I also identify strongly with the true residents of this community, commercial fisherpersons, who have in the interest of their resource, somewhat calmly accepted the 50% reduction of their quotas. This has to be wrong. How can a management plan reduce our local resident fleet to poverty level and allow a charter business to grow at their expense.

I would highly support any "hook size" limit that you may be considering (something I learned tonight), but would be far more in favor of a weight/size, and let's just forget the babies for those who need to pack a few more pitiful pounds into their fish boxes.

This letter is from a local resident who no longer fishes for fun and enjoyment (how can we), but one who respects conservative allocation of Alaska resources. Please try to do something on our behalf.

Thank you very much.


Bonnie Kaden
Gustavus, Alaska 99826
bonniekaden@gmail.com

Marilyn Jackson
PO Box 195
Gustavus, AK 99826
(907)697-2351

MPFMC

To Whom It May Concern:

I have lived in Gustavus for 19 years, and have watched it move from a hometown with commercial fishermen and two fish plants to a summer community with a plethora of charter boats (most of which process their own fish) and fishing lodges.

No longer do we have the high number of people who are year-round residences. No longer do we have the fleet of commercial fishermen. Part of the problem with the halibut fleet has been the steady decline in the fishing value of our IFQ's.

My husband was awarded IFQ's after fishing halibut in Alaska for over 10 years. He now finds that yearly the amount that he was giving is declining.

When John makes a delivery, he has to call ahead and have someone at the dock verify the amount caught and his IFQ number etc. I ask that the charter boat industry, which is just another commercial enterprise, be forced into the IFQ program. They should have to share the burden of catch limits which will keep the resource strong.

I work for Alaska Airlines and see just how much fish is flying out of Icy Strait. Every one of the charter boat fishermen go out with a minimum of two 50 pound boxes of dressed fish. Some take more, but all take at least the two. These people do nothing to help the economy of our town. They have their fish processed at the lodges which are owned by out of state people. They eat and stay at the same lodges. The whole charter industry here is reminiscent of the rape and pillage of the lower 48 with Alaska's resources. Now the bandits are in charter boats. The only way this will slow down and stop hurting the resource is by regulations that work and are enforced.

There needs to be IFQ's for the charter fishermen. There needs to be enforcement of the amount of fish they can pull out of the water each season.

I hope you can get something passed that will actually be enforced. These charter boat people have huge resources behind them. We only have the hope that fair regulations will prevail.

Thank you for your time.

Marilyn Jackson

A handwritten signature in black ink that reads "Marilyn Jackson". The signature is written in a cursive style and is followed by a long horizontal line that extends to the right.

John Jackson
PO Box 195
Gustavus, AK 99828
907 697-2351

MPFCM

To Whom It May Concern:

I would like those who are deciding the fate of the halibut catch in SE Alaska to take a close look at the number of pounds of fish the charter industry is taking. I have a small IFQ which I have seen decline in amount almost every year until now it is almost half of what it was originally. When I first started halibut fishing, there was a "derby" which was dangerous to the fisherman and the resource. Now that things are regulated, the resource and the fisherman are both safer.


Put into this mix the charter boat fishermen. The charter boats take fish every day of the spring, summer and early fall. There is no limit to the days they fish. There is to limit to the amount of fish they take from any area of the local waters. There needs to be an IFQ SYSTEM IMPOSED ON THE CHARTER INDUSTRY.

We need these commercial fishing charter operations to have IFQ's like the other commercial fleet. We need them to be limited, and if they go over their limit, to have that limited reduced the following year by that amount. There needs to be more transparency and accountability for their catch reporting.

The charter fleet here in Gustavus has grown exponentially in the last few years. Like the American banking industry, no one is regulating the number of charter licenses. Like the banking industry, the lack of regulation will cause a huge decline which will impact all of us.

Most of all, the commercial fleet should not have to pay for the over fishing of the charter fleet. There should be no further decline in the amount the IFQ's of the commercial fleet are worth. It is as if the money they can earn each year is being reduced because of the bad behavior of another gear group. I ask you to make the fishing rules for the charter industry reflect the fact that they are, in truth, commercial fishing operations and make them have IFQ's like the rest of the halibut industry.

Sincerely,


John Jackson

To: North Pacific Fisheries Mgmt Council
 FAX: 907-271-2817

Sept 22, 2008

Dear Eric Olson,

I am writing to express my concern about halibut charter fishing in ^{Alaska} Alaska. First I want to draw a distinction between non-guided sport fishing and commercial charter fishing; the latter is essentially a commercial fishery and needs to be managed as such. I have some faith in the IPHC + NPFMC allocation + management of halibut fishing, but commercial charter catch needs to be managed under the same system. As it is, commercial charters are growing so fast that it is negatively affecting commercial set-line fisheries, and fish stocks! Using a quota system for charter fishing is a possible approach, but the mechanism is up to you. I just want to strongly encourage you to manage this fishery to stay below GHL(!) without reallocating the catch from set-liners to the charter fleet. The charter catch needs to be responsive to fish abundance in the same way as the commercial set-liners are. For these reasons I support strongly the proposal to tie charter allocations to fish abundance.

Sincerely, *cmg*
 CHRIS GABRIELE

PO BOX 204

GUSTAVUS, AK 99826

cmg007@gmail.com

P.S. Limits to hook size to limit the size of fish caught by charter fishermen is also an excellent idea.

Sept. 23, 2008

Dear Erik Olson

I am writing you as a sport fisherman, biologist and very concerned citizen. I am concerned that the halibut resource is not being managed properly. The charter industry must be controlled! I live in Gustavus, and in just a short time the charter fleet has grown rapidly. They are catching more fish than they ever have and are having a real impact. Local depletion is a real problem that is having a real impact. As you know the charter industry has exceeded their GTH for the last 5 years. They need to be held accountable. The fishery must be managed consistently and sustainably.

I also advocate for the Charter industry to be distinguished from sport fishing. The charter fleet consists of 28' foot overpowered boats with the most advanced fish finding technology. They fish deeper and target large fish. They are catching fish on a commercial level. The charter industry is distinctly different from sport fishermen.

Thanks for your time,

Craig Murdoch

Gustavus Ak
Sept 23, 2008

Chair: Eric Olson
NPFMC
Anchorage, Ak

Dear Mr. Olson:

I have lived in Gustavus for 40 years, actively involved in the sport fishery throughout this time to put fish by for the winter. During this time, the fishery has been up & down somewhat, but has seemed to be generally well managed. This last decade, Icy Strait has been smelted out by many interests, and the acceleration of effort has been alarming to watch. Two "self-guarding" operations out of Excursion Inlet and out dozens of skiffers every summer day; Whitehouse people fish out of Hothot.

But the biggest recent thing is the great increase in boat charter flake, out of all the Icy Strait towns and as far north as Junction. This fishery (and the turbot abundance) are essentially unregulated, eating an increase in by large bite out of the stock without any regard to limits imposed by the stock size. Local depletion is beginning to happen, and will only get worse unless the council acts now!

In our 20, the GHL is rapidly dropping, while these types of take are going off the charts. Please: set an allocation, based on stock abundance, install an IFQ program like the commercial fleet does.

Thank You! Greg Struelens
BIA 94

9/23/08

Dear Erik Olson,

I am writing to you on the issue of limiting the harvest of halibut by charter fish operators in Area 2C. It is time to take swift and effective action to curb the gross over-harvest of halibut by charter businesses.

I am deeply concerned about local depletion and the repeated pattern of the charter fleet exceeding their GHL.

There are now 30+ charter vessels operating out of Gustavus in Glacier Bay & Icy Strait. At the current rate of increase in charter fishing effort, I worry that this pattern is unsustainable... I know it is unsustainable; how can the charter fleet continue to exceed its GHL and be sustainable?? At the same time, the commercial fleet's quota is reduced. This management scheme is broken and the time to fix it is now.

Sincerely, Janet Neilson
PO Box 268
Gustavus, AK 99826

9/23/2008

Dear Erik Olson,

I believe that charter fishers need to be managed as if they were commercial fishers. Charter fishers are extracting vast amounts of fish with little or no limit. This is not sustainable or equitable.

The allocation for charter fishers should NOT be fixed, it should be tied to abundance.

I am concerned that halibut are being overharvested by the charter fleet. I am also concerned about the shifting size of halibut. Larger, breeding fish are being targeted by the charter fleet. So now, we are seeing a shift downward in size.

I support limiting hook size to 16/0 to help in this matter.

Sincerely,

Sean Neilson

Box 268
Gustavus AK 99826

Paul Berry

PO Box 143

Gustavus, AK 99826

(907) 697-2714

To: Eric Olson
NPFC

Hello,

I'm concerned about overfishing of
halibut guided charter fishermen in the
Icy Strait area.

Charter & "assisted unguided" charter need
to be regulated.

Thank you for your consideration

 Paul Berry

September 23, 2008

To Eric Olson,

I live in the community of Gustavus. Every day I see the local sport charter fleet come back with boat load after boat load of halibut headed for freezer burn down South..

~ The halibut resource is severely depleted.

~ The charter sport fleet allocation should fluctuate with the abundance of the resource. It's my understanding that charter fleets went way over their GHL this summer. They need to be managed to their GHL.

~ I would hope that someday we won't see the big female breeders caught. The hook size ~~was~~ should be limited.

Thank you,

Jai Orapella

PO Box 240

Gustavus, AK

99826

SEPT. 23, 2008,

DEAR MR. ERIK OLSON,

I AM WRITING TO EXPRESS MY DEEP CONCERN WITH THE CURRENT STATE OF OVERSIGHT OF THE COMMERCIAL CHARTER FISHERY IN ALASKA. THE COMMERCIAL CHARTER INDUSTRY IS CURRENTLY UNDERGOING UNPRECEDENTED GROWTH, AND REGULATION HAS CLEARLY NOT KEPT PACE WITH THIS GROWTH. THIS IS REFLECTED IN THE RECURRENT OVERLAP OF THE CHARTER FLEETS GUIDELINE HARVEST LEVEL DURING THE LAST FIVE YEARS. THIS HAS OCCURRED DURING A TIME WHEN OVERALL ABUNDANCE OF HALIBUT HAS DECREASED. THE COST OF THIS MIS-MANAGEMENT IS BORNE BY THE REGULATORS ITSELF, AS WELL AS LOCAL SUBSISTENCE, SPORT (UNGUIDED OR ASSISTED), AND COMMERCIAL FISHERMEN.

REGULATION OF THE CHARTER FISHERY PRESENTLY DOES NOT ENCOURAGE LONG-TERM CONSERVATION OF THE RESOURCE. CHARTER FISHERMEN ARE PUT INTO A POSITION OF HAVING TO TARGET LARGE HALIBUT TO SATISFY UNREASONABLE EXPECTATIONS ON THE PART OF THEIR CLIENTS FOR "GIANT HALIBUT." THESE ANIMALS ARE RARE, AND ARE A DISPROPORTIONATELY IMPORTANT PART OF THE BREEDING POPULATION. A FISHERY WHICH TARGETS THEM CLEARLY THREATENS ALL USERS OF THE RESOURCE.

SEVERAL MANAGEMENT TOOLS ARE AVAILABLE. THESE INCLUDE A REDUCTION IN DAILY ALLOWABLE CATCH, REDUCTION OF TECHNOLOGY WHICH LIMITS CATCH OF VERY LARGE FISH, LIMITED-ENTRY INTO THE FISHERY, AND INSTITUTION OF INDIVIDUAL QUOTAS (WHICH CAN BE TRADED). ALL SHOULD BE CONSIDERED.

AS A LONGTIME RESIDENT OF GUSTAVUS, ALASKA, WHO PLANS TO SPEND THE REST OF MY LIFE HERE, I AM DEEPLY CONCERNED WITH THE LONG-TERM HEALTH OF THE WATERS OF ICY STRAIT, ON WHICH SO MANY PEOPLE HERE DEPEND. THE MASSIVE GROWTH OF THE CHARTER FLEET HERE PROVIDES A CLEAR EXAMPLE OF THE UNSUSTAINABLE PATH THIS INDUSTRY IS ON. I URGE IMMEDIATE ACTION ON THIS ISSUE. SINCERELY, JUSTIN SMITH, GUSTAVUS, ALASKA

9-22-08

To Eric Olsen, Council Chair,

The sport fishing fleet catch

needs to be regulated

in such a way to reflect

the total allowable catch.

Sincerely, Janice Clarke

PO Box 212

Gustavus, AK

9/22/08

Dear Eric Olson -

I am a strong supporter that the NPFMC regulate the charter fisherman, in general, and the 2C area specifically around "hub fishing zones". At this time there is no allowable catch cap on local fleets. This is causing local area depletions and is drastically affecting the ability of locals and subsistence users to have access to the resource.

I support the NPFMC enforce the GHZ strictly and not allow the charter fleet to exceed this GHZ. This GHZ should fluctuate with abundance as it does for the commercial fleet. Thank you

Kathy Lochman
Kathy Lochman

Box 252
Gustavus, AK
99826

Sept 23, 2008

To: Eric Olson, Council Chair

From: Sally McLaughlin
PO Box 73, Gustavus, AK 99826

Our halibut resources need to be managed in a manner that is fair and equitable to all harvesters. This means that the commercial charter fishery needs to be regulated and be held accountable to those regulations.

The commercial setline fishery is impacted by the charter fishery consistently going over the GIL with no repercussion as well as the local, unguided average sport fisherman. Local fishermen, fishing for our families, are forced to go farther from home to find fish which is often not possible due to weather and time limitations.

Please consider catch limits or other regulations to protect our halibut resources and to help ensure that halibut are available for all harvesters.

Thank you,
Sally McLaughlin

Gustavus, Alaska
Sept. 23, 2008

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

Dear Chairman Olson:

I am writing in regard to the halibut charter Guideline Harvest Level and the means of enforcement, with special reference to IPHC area 2C.

The situation with annual catches substantially above the charter fishery Guideline Harvest Level is one of irresponsible fisheries management and is having serious consequences. The situation was well described in Bruce Lehman's letter from the IPHC dated Sept. 19, 2008.

A firm harvest level, not a "Guideline," must be set. It should be tied to abundance. Other fisheries sectors should not have to pay for overages by the charter industry. Either there must be a means of accurate in-season catch data tied to season closures when the harvest level is reached, or the charter sector must pay for any overages in the following season. The firm Harvest Level should be no higher, as a percentage of the total allowable catch, than the current GHL.

Currently all the other fisheries sectors are paying for mismanagement of the charter fishery. The commercial setline fishery took a 43% reduction in area 2C between 2006 and 2008. Local subsistence and sport fishers are finding it harder to satisfy their needs for halibut because of overall 2C halibut depletion. Moreover, since IPHC management is based on very large catch areas (2C, 3A, etc.) local depletions around coastal communities are underway and there is no means of preventing them. No means except developing Local Area Management Plans, something extremely difficult to do, especially when a number of communities with varying interests use the same fishing areas. There is a reason why Sitka Sound is still the sole example of a LAMP. Meanwhile, rising fuel costs are exacerbating the situation, as both charter fishermen and local resident fishermen try to get halibut closer to their home ports.

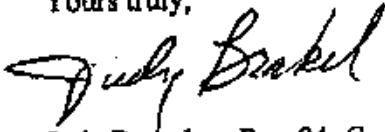
I want to remind you of yet another sector, one that could grow rapidly due to lack of management constraints: the "Self-guided" sport fishery. Here in Icy Strait in area 2C we have two such lodges operating in Excursion Inlet, the larger hosting 60 clients per week. They send the clients out several to a boat with GPS locations for good halibut areas, and a minder boat oversees to be sure they don't get into trouble and have a successful day. They are managed under the same rules as private sport fishermen, so Harvest Levels, 1 fish per day limits, etc. imposed on the charter fishery will not affect them.

In my community of Gustavus the residents are ever more upset at the sight of the charter fishery, with almost all the charter captains and all of their clients from out-of-state,

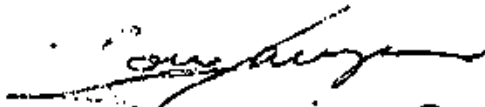
sending out a minimum of two 50 lb. fish boxes per client per week. These lodges are expanding each year.

Thank you for your attention.

Yours truly,



Judy Brakel Box 94, Gustavus, AK 99826 e-mail grigori@gustavus.ak.us



LOU CACCIOPPO BOX 213 GUSTAVUS, AK 99826

September 22, 2008



Eric Olson, Chairman
North Pacific Fisheries Management Council
605 West 4th, Suite 306.
Anchorage, Alaska 99501-2252

Re: Agenda Item C-1 (b) Charter Halibut

Dear Mr. Olson:

Starting in April 1990, I have been a lodge owner/operator and USCG licensed captain in Sitka, Alaska for the last 19 years. Currently owner of the Wild Strawberry Lodge, we employ 28 staff and I am also the mother of two young children. I am extremely concerned because I foresee the financial future for many of us in the sportfishing industry to be in great jeopardy! This summer I decided to conduct a survey of the guided anglers that stayed at my facility and see what they felt about the proposed one halibut daily bag limit. A majority of my clients handwrote their own comments as well, and were very willing to express their concerns. Others did not...Here is a survey recap from 806 of my clients that voluntarily chose to fill out a survey:

- There were a total of **806 surveys** collected between May 17th and September 11th, 2008. Note: 205 surveys were turned in for 5/17/08 thru 6/20/08. Then we made some changes on the survey to some of the questions - and I collected another 601 Surveys between 6/20/08 and 9/11/08.
- This survey recap accounts for **2,525 Guided Angler Days**.
- A total of **\$3,132,164.50** was accounted for on the Surveys, giving an average value of **\$1,240.46 per Angler Day**.
- 791 respondents were Non-Resident; 15 Respondents were Alaska Residents.
- **766 Respondents said: 'A one halibut daily bag limit would cause them to reconsider spending their money charter fishing in Alaska'. This accounts for 2298 Angler Days or \$2,850,577 that will be lost to Alaska in the future if there is a one halibut daily bag limit.**
- Results to the question: 'It is VERY, SOMEWHAT, or NOT important to have a two fish halibut bag limit?' (5/17/08 thru 6/20/08)
 - 196 said: **Very Important = 95.6%**
 - 3 said: **SOMEWHAT Important**
 - 6 said: **NOT Important At All**
- Results to the question: 'It is VERY, SOMEWHAT, or NOT important to have no size restriction on the halibut I harvest?' (5/17/08 thru 6/20/08)
 - 184 said: **VERY Important = 89.8%**
 - 16 said: **Somewhat Important**
 - 5 said: **No size restrictions**

- Results to the question: "It is VERY, SOMEWHAT, or NOT important to have a two fish halibut bag limit w/no size restriction?" (6/20/08 thru 9/11/08)
 - **590 said: Very Important = 98%**
 - 7 said: SOMEWHAT Important
 - 3 said: NOT Important At All
 - 1 had No Comment

- Results to the question: "A one halibut daily bag limit will cause me reconsider spending my money fishing from a charter boat in Alaska?" (5/17/08 thru 9/11/08)
 - **766 said: YES = 95%**
 - 28 said: Possibly or Maybe
 - 12 said: No

- Results to the question: "I believe all sport anglers should be treated alike and have the same bag limits whether they choose to charter boat or not?" (5/17/08 thru 9/11/08)
 - **786 said: YES = 97.5%**
 - 6 said: Possibly or Maybe
 - 14 said: No comment or Maybe

- Results to the question: "I have other options available to access my halibut resource besides chartering a boat." Yes or No? (5/17/08 thru 6/20/08)
 - 47 said: YES
 - **154 said: NO = 61%**
 - 1 said: YES and NO
 - 3 said: No comment

- Results to the question: "The charter industry is my only way of accessing my halibut resource." Yes or No? (6/20/08 thru 9/11/08)
 - **587 said: YES = 97.7%**
 - 14 said: NO

- Results to the question: "I support a guided sport ANNUAL halibut limit of: Zero = No And 4, 6, 8, 10, 12 = Yes (5/17/08 thru 6/20/08)
 - **144 respondents said there should be NO Annual limit = 76.2%**
 - 1 person said 3 annual
 - 8 said 4 fish annually would be acceptable.
 - 16 said 6 fish annually would be acceptable.
 - 5 said 10 fish annually would be acceptable.
 - 15 said 12 fish annually would be acceptable.


- Results to the question: "I support a guided sport ANNUAL halibut limit? Yes? or No? (6/20/08 thru 9/11/08)
 - **536 respondents said there should be NO Annual limit = 89.2%**
 - 47 respondents said Yes
 - 17 respondents said Maybe
 - 1 respondent had no comment

I have submitted the enclosed 806 INDIVIDUAL client surveys as the direct voice/message from the American Public to you the members of the North Pacific Fisheries Management Council to hear! THIS IS THE VOICE OF THE PUBLIC - JOE AVERAGE AMERICAN ANGLER SPEAKING TO YOU THRU THESE SURVEYS! And these results reveal a scary forecast economically speaking for our industry!

If we could have polled 10,000 plus anglers this summer - **their message as the public majority would still be the same!!!** These guided anglers bring their dollars to our state and all they are seeking is a fair *opportunity* to catch two halibut per day with no annual limits. This does not mean they are going to catch two halibut per day. They just don't want their *opportunity* taken away! Every year for the past many years, the guided anglers and the non-resident anglers have been ratcheted down one notch at a time...**and this is the tipping point!**

Reviewing the results of the written comments regarding their opposition to a one halibut daily bag limit and opposing an annual limit as well, which the clients submitted in their surveys, it is evident that Alaska will lose a large number of these visitors along with the significant dollars they bring to Alaskan coastal communities such as Sitka! The majority of these folks said they would spend their money in Mexico or Canada, so not only will Alaska lose, but so would the United States. They plan to go where the local coastal communities will welcome and appreciate their vacation dollars they bring. With the current state of our economy we cannot afford to see these dollars slip away from Alaska! I have submitted for your perusal a Typed Summary of Written Comments these same clients wrote in on their surveys. Their mutual consistent message from these guided anglers -the American Public - is asking you to please, do not take away their *opportunity* to catch and keep two halibut per day and no annual limits either!

The majority of clients strongly support the concept that all recreational anglers, guided and unguided, should be under the same bag limits for catching this public resource called halibut. It should not matter that they chose to go out on a charter boat to catch their halibut, or on a private boat. And they do not understand why they should be penalized with a more restrictive bag limit if they are being guided. Is there a good reason for this discrimination? Is it legal and justifiable? And they are strongly opposed to the concept of leasing/having to pay to keep a second halibut because they are guided and they would not have to pay to keep a second halibut if they were on a private boat! There is a glass ceiling that creates a fine line between what an operator can charge and still have enough to pay all the bills - much less charge a client more money for the cost of leasing poundage to provide a second halibut! A very high number of these clients surveyed wrote, "It is too cost prohibitive for less and less fish. And they will not be back if there is a one halibut daily bag limit! Combine this with other very restrictive regulations such as no king salmon this summer from July 16th thru Sept. 30th, and no lingcod from June 16th thru August 15th, and Alaska is doing an excellent job of sending a strong negative message to the angling public and wreaking havoc on the recreational fishing industry!!! I appeal to the wisdom and common sense of the members of the North Pacific Management Council to please hear the voice of the Average American Angler and make the right decisions for the good of the American public and the economy of Alaskan communities. Respectfully Submitted


Theresa Weiser
Owner/Operator Wild Strawberry Lodge

Summary of Comments from 2008 Guided Recreational Anglers From the Client Survey

Non Resident - KERBY LANFORD wrote on 5/17/08:

I feel there should be a size limit (small) but not a 1 bag limit for sport charter fishing.

Non Resident - MATT LANFORD wrote on 5/17/08:

NO LIMITS

Non Resident - W.D. LANFORD wrote on 5/17/08:

No No Annual Limit Please!

Non Resident - DWIGHT LEISTER wrote on 5/17/08:

It is very important to catch at least 2 halibut per day fishing (No size limit)

Non Resident - RAYANNE LEISTER wrote on 5/17/08:

That is absurd, two fish period! No Annual limit. It shouldn't matter the size. If I am going to make a trip this far I want to catch as many fish as I can to make it worth my time & money.

Non Resident - AMANDA LEISTER wrote on 5/17/08:

No Annual Limit. A two fish halibut bag limit should absolutely be standard for all anglers, and there should not be a small halibut requirement for the second fish. This would cause me to reconsider spending so much money in Alaska to fish.

Non Resident - STEPHEN L. BILOVESKY wrote on 5/17/08:

No Annual Limit! I do not believe that the bag limit of 2 fish per day without a size limit.

Non Resident - PATRICIA M. BILOVESKY wrote on 5/17/08:

No annual limit. There should be no size limit to the halibut I catch.

Non Resident - FRANK HICE wrote on 5/17/08:

NO ANNUAL LIMIT

Non Resident - GERALD ROVEY wrote on 5/17/08:

No Annual Limit, No Size Limit 2 fish per day as current regulations are.

Non Resident - TODD ROVEY wrote on 5/17/08:

I think that putting a restriction on the limit is wrong and hurts small business. I do not think that it is right to put a price on extra catch because the fish is not owned by any government or single person.

Non Resident - JAKE ROVEY wrote on 5/17/08:

As a visiting fisherman, I will not pay money to have my fishing opportunities restricted. Reducing the bag limit of halibut is ridiculous.

Non Resident - WILLIAM ZIMMERMAN wrote on 5/18/08:

No annual halibut limit.

Non Resident - ROBERT G. HOWARD wrote on 5/18/08:

You will devastate this charter industry, as well as out of state participation. Not a smart move!

Non Resident - KATHY J. FILENER wrote on 5/20/08:

No annual halibut limits!! We don't do this for just the sport or the one time glory, we also do it for the quality of fish for health purposes.

Non Resident - GLEN A. FILENER wrote on 5/20/08:

No Limits. Enjoy the great quality of table fare, would not come if had lower limits.

Non Resident - WILLIAM J. ZADRA wrote on 5/20/08:

No annual halibut limits please very important for experience want quality halibut fishing.

Non Resident - PHYLLIS ZADRA wrote on 5/20/08:

Recap of 2008 Guided Recreational Angler Comments

No Annual Halibut limit please. I really enjoyed the fishing, but if the catch is limited we probably wouldn't return.

Non Resident - JERRY BANTA wrote on 5/20/08:

Why not let us have a chance to harvest very good fish.

Non Resident - DARREL APLANALP wrote on 5/20/08:

No halibut limit. Taking fish home is a big part of it form me.

Non Resident - KEVIN BELL wrote on 5/20/08:

Sport fishing should be looked at closely when setting regulations.

Non Resident - RICHARD JENSEN wrote on 5/20/08:

Should not be discriminated for going on a charter boat. Support a no bag (Annual) limit.

Non Resident - GORDON BELL wrote on 5/20/08:

I support No Annual Limit. Whether fishing on a charter or private boat. I enjoy the experience and taking home fish to enjoy.

Non Resident - RICK NELSON wrote on 5/20/08:

NO ANNUAL LIMIT ON HALIBUT. This trip would almost be restrictive if I could not take home some quality fish - If you are going to restrict anything restrict the long liners or commercial guys-

Non Resident - THOMAS E. NELSON wrote on 5/20/08:

NO ANNUAL HALIBUT LIMIT- It is very important for me to experience the chartering boat for fishing. Halibut is very important to me.

Non Resident - ROBIN R. NELSON wrote on 5/20/08:

No annual limits on halibut, please. The sport fishing industry is gaining nothing while the commercial industry is booming. This fact is a troubling issue. Sport fish counts for a small portion of the industry that people enjoy; commercial fishing is all about money. It should be an enjoyment that I would like to enjoy with my children when older.

Non Resident - STANLEY E. NELSON wrote on 5/20/08:

No Annual Limit on Halibut (Hell No)

Non Resident - ALBERT BAKER wrote on 5/21/08:

I do not support - no Halibut Limits Annually - The commercial fishermen limitation would greatly effect recreational fishing here. People would not fish here (Sitka) for the cost, if only one bag limit.

Non Resident - KENNETH WATTS wrote on 5/21/08:

Leave sport fishing alone, also I do NOT support an annual limit.

Non Resident - MICHAEL C. FOSTER wrote on 5/21/08:

No annual halibut limit.

Non Resident - REGINALD B. HUMDY wrote on 5/21/08:

Not in favor of an annual halibut limit - If there were halibut limits I would more than likely fish in Mexico.

Non Resident - PAUL E. WARD wrote on 5/21/08:

I do NOT support an annual limit.

Non Resident - CURTIS WILKINS wrote on 5/21/08:

NO annual halibut limit.

Non Resident - PEGGY APLANALP wrote on 5/21/08:

NO halibut limit. Taking fish home is the reason I fish!!!

Resident - JOE EVERHART wrote on 5/22/08:

I will spend in excess of \$12,000 on charter fishing, this season. I DON'T SUPPORT AN ANNUAL halibut limit due to my lacrous charter trips. Annual bag limits for halibut are not necessary needed.

Resident – MIKE MCCORMACK wrote on 5/22/08

I am a 60 year old AK resident. My family came to Alaska in 1898 – I do not own a boat and depend on guided fishing for fish stock, putting a 1 fish limit a day is discriminatory and as a life long Alaskan should be treated like all other Alaskans who own their own boat.

Resident – ANTHONY E. EDWARDSSEN wrote on 5/22/08:

I don't support any halibut limits.

Non Resident – RUTH HELLEREN wrote on 5/23/08:

It is discrimination to regulate a low bag limit of 1 per day for persons for persons choosing & fishing for halibut on a charter boat.

Non Resident – SYEN HELLEREN wrote on 5/23/08:

It is discrimination to regulate & lower bag limit of 1 per day for persons choosing & go fishing for halibut on a charter boat.

Non Resident – DAVID DOUGLAS wrote on 5/23/08:

It is a big effect to take time off work & travel to Alaska. If the limits continue to be cut it will require us to look elsewhere for recreation.

Non Resident – TOM D PARKINSON wrote on 5/23/08:

I feel that if the limits are continually restricted, people will begin to go elsewhere which will severely impact the small towns & villages economically where charter fishing is a major industry.

Non Resident – TAMI PARKINSON wrote on 5/23/08:

Halibut fishing is certainly a tourism draw to Alaska; with the on going changes in regulations and takes rules it is going to impact or have an impact on the economics that sport fisherman tourism brings into the communities/Alaska. I believe there shouldn't be an annual limit to the sport fisherman, people come to the destination fishing areas not only for the experience but also to bring some fish home as well- with their experience or vacation to these areas these "visitors" bring a lot of economic viability to the smaller communities who have come to depend on the tourism industry in view of other resource mgnt down sizing (ie: timber etc). Please reconsider your rule to further limit the sport fisherman who comes to Alaska as their destination point.

Non Resident – PHILL BROOKS wrote on 5/26/08:

I will SPEND my sport fishing money in another way.

Non Resident – DAVID BROOKS wrote on 5/26/08:

A one fish limit is unfair and I will not return to fish in Alaska if this restriction is activated. Also in the 2 times for a total of 6 days I have fished in Alaska I have only caught 8 halibut but would like the change to catch more!

Non Resident – DAVID BRYAN wrote on 5/26/08:

This trip is important to me, to have the opportunity to fish these waters, and travel this far, 2 halibut daily bag limit is important.

Non Resident – RICHARD J. BRYAN wrote on 5/26/08:

I feel that the halibut limit is very unfair for me, because of the money I spend to come so far.

Non Resident – STEPHEN COLLINS wrote on 5/26/08:

As a recreation fisher I desire to take a reasonable portion -it makes less sense to spend all costs for a vacation with such a limited catch (witch I feel this would be). The rules should be equally enforced.

Non Resident – ROBERT C. COLLINS wrote on 5/26/08:

This is my 5th trip to Alaska for sport fishing .since 1998 the current limits on halibut size and numbers will make me explore other options for my recreational budget. At this time due to 1 bag limit I will not be back!!!!

Non Resident – CRISTOPHER COLLINS wrote on 5/26/08:

Good public policy should balance the needs competing interests. In the case of halibut fishing the government should encourage charter fishing in Alaska, as it generates significantly higher revenue per pound of fish than commercial fishing operations. The limits currently established create incentive for the average fisherman to come to Alaska. Decreased limits or increase in regulation of charter fishing will create barriers to out of state fishing which AGAIN generates more revenue per pound of fish than

commercial operations. The revenue per pound does not include the additional benefits of the tourist industry for local businesses and state/federal taxes and fees.

Non Resident – ERIC J. BRYAN wrote on 5/26/08:

I want to come to Sitka to catch my 2 nice halibut for fresh wild fish at my home.

Non Resident – JAMES BRYAN wrote on 5/26/08:

I don't think we should have a bag limit. We only come for 3 days and you should be able to keep as many as we can.

Non Resident – JOSEPH PENSY wrote on 5/26/08:

I do not feel it is fair to limit the halibut catch. Since we prefer to use a charter guide company to help us fish we will now be restricted to our catch numbers and will be forced to go to another country for this service and spend our dollars elsewhere.

Non Resident - KENNETH BRYAN wrote on 5/26/08:

A one halibut limit will force me to reconsider spending vacation money to charter a boat, hurting the charter business as well as the local community.

Non Resident – GARY MATTHIS wrote on 5/26/08:

Halibut is my favorite fish and limiting my opportunity to catch this fish is UN American!

Non Resident – RYAN PENSY wrote on 5/27/08:

I have traveled all the way from Florida to fish a healthy fish such as halibut. Now to find out that such a communist doctrine has been put in place to limit my ability to catch halibut is un American and would make Captain Long John Silver turn over in his grave.

Non Resident – BARRY BROOKS wrote on 5/27/08:

Halibut is the preferred fish for my family and a one fish limit would most likely cause me to fish elsewhere.

Non Resident – GEOFFREY T. CARR wrote on 5/28/08:

I have no fixed belief about the appropriate limit however; all sport anglers should be subject to the same restrictions to protect the resource. Some consideration of local residents who theoretically support local government by taxation should also be considered.

Non Resident – GREG CARR wrote on 5/28/08:

Nonresident fishermen bring a tremendous economic benefit to the local communities in \$ per pound of fish. Also, a resource that is owned by the state is for the benefits of all, not just as an entitlement to one special interest group such as commercial fishermen.

Non Resident – BRANDON CARR wrote on 5/29/08:

I believe that the limit should be a function of what is necessary to maintain the species be if boat owner of visiting guest, although Alaska residency could be a factor in the limit.

Non Resident – JIM BLICKENSTAFF wrote on 5/29/08:

The idea of a 2 per day halibut limit is even more important than actually getting 2 per day! We felt good we may get 2 per day even though we actually averaged only 1 per day – Don't take that "dream" away from us – as long as yearly pound by ADFO allow.

Non Resident – R.D. BLICKENSTAFF wrote on 5/29/08:

King salmon should have a carry-over – When no salmon caught 1 day 2 should be allowed the next day.

Non Resident – JOHN F. CLEMSON wrote on 5/29/08:

I have traveled a long way to come here to fish! That means bring back fish & memories. A two unit halibut per trip seems reasonable to me. If the sport were banned like in California this year, lots of folks would be hurt. However the fish population must also be managed.

Non Resident – BLAINE SYNDER wrote on 5/30/08:

Halibut is my preferred fish to eat If a limit of 1 per day is imposed I would not return.

Non Resident - KALY MORTON wrote on 5/31/08:

No limit will keep me coming back.

Non Resident – JOHN R. GIDEON wrote on 5/31/08:

It is at least a 90 minute trip from the harbor to the fishing grounds, each way. Besides the cost why would I want to take this boring trip just to catch one halibut? Keep the tourism dollar coming in and support the charter services.

Non Resident – JOHN F. HESKETT wrote on 5/31/08:

This is my 4th year in a row because of the excellent salmon & halibut. Future trips are becoming expensive for a WWII returned Veteran.

Non Resident – DAVID GROSECLOSE wrote on 5/31/08:

The irrational restriction you are imposing on charter boat fishing will substantially damage the industry & not very smart.

Non Resident – JOE DAVIS wrote on 5/31/08:

My concern is disparate treatment. If all people who fish for salmon/halibut are treated equally, I can support justified restrictions to preserve the species. However, I will not come to Alaska to fish, give in the cost to be limited to 1 king salmon & effectively, 1 halibut per day.

Non Resident – ALEX TUCKER wrote on 5/31/08:

I would like the opportunity to catch 2 halibut. It is unfairly discriminating against someone who chooses to go on a guided trip.

Non Resident – TIMOTHY K. TUCKER wrote on 5/31/08:

If you continue restrictions we will obviously go to Canada!

Non Resident – TIM TUCKER wrote on 5/31/08:

You people are cutting your own throats by allowing people to take large female eggerters. There should be a NO NO for both sport and commercial.

Non Resident – JERRY LOVEDAY wrote on 5/31/08:

I have a great time & spend lot of money, but if I can't take fish home, I will not come.

Non Resident – GLENN BOEHLKE wrote on 5/31/08:

I like coming to fish but if they mess up the limit I will not come!

Non Resident – DAVE EDWARDS wrote on 5/31/08:

They need to regulate, but the commercial boats waste more fish than we catch.

Non Resident – WILLIAM SAURCE wrote on 6/3/08:

There should be a limit long lining also – we pay taxes also.

Non Resident – JIM SAURER wrote on 6/3/08:

To travel thousand of miles to catch one halibut a day will require me to look elsewhere for a vacation, which could affect this tourism in Alaska.

Non Resident – VINCE MAC ISAAC wrote on 06/03/08

The ling cod restrictions are over the top!! Restrict size of halibut – i.e. –over 50 lbs goods!!

Non Resident – MARTIN C. BARBA wrote on 6/3/08:

I spend a lot of \$ coming to Alaska to bring fish home. I may be forced to fish Mexico in the future.

Non Resident – EDUARDO ANDRADE wrote on 6/3/08:

If the new regulation continues less & less people (anglers) will come to fish to Alaska.

Non Resident – CLYDE BROWN wrote on 6/3/08:

I this is not the fair, I believe the government is picking on the sportsman & is not fair compared to what is taken commercially.

Non Resident – ABILEO COCACO wrote on 6/9/08:

GOD SAVE THE QUEEN

Non Resident – MIKE DENDRINOS wrote on 6/3/08:

2 halibuts/day is a restrictive measure but understandable due to the fishing pressure put on this species I will be reconsidering my next years trip due to the lack of fish I bring home.

Non Resident - VAN HESTER wrote on 6/3/08:

It seems the charter boats take a very small portion of the halibut.

Non Resident - JOSEPH G. REYES wrote on 6/3/08:

The fishing limits will stop me from fishing in Alaska.

Non Resident - MAX NORRIS wrote on 6/3/08:

The 1 fish limit will stop me from coming up here fishing! I have been here -Alaska fishing the last 4 years and several years before that!! I do want to come back?

Non Resident - MARK S CHRISTENSEN wrote on 6/5/08:

The current 1 halibut limit that was imposed immediately prior to my arrival is unfair. To encourage sport fishing, quantity restrictions shouldn't becoming stricter

Non Resident - PATRICK CHRISTENSEN wrote on 6/5/08:

It makes no sense to place restriction on chartered halibut fishing without placing restrictions on commercial halibut fishing limits. Though the halibut resource may be declining the responsibility to correct this problem should not rest solely on charter fishing.

Non Resident - KEVIN KLINE wrote on 6/5/08:

Per pound, I am certain that sport anglers contribute greater \$\$ to local Alaska communities. We are willing to pay a premium for the experience. However, as the price per lb. for halibut increases to sport anglers (inclusive at will cost for trips) I will likely be deterred from traveling to Alaska.

Non Resident - JAY NEWELL wrote on 6/7/08:

We have an annual fish-fly and count on the halibut we catch in Alaska.

Non Resident - DANNY RENO wrote on 6/7/08:

The one halibut doesn't seem fair to impose upon resident/non resident fishing in a charter boat. Why do you feel that the charter industry should be the one to feel the discrimination for all anglers?

Non Resident - MERLE SCHREINER wrote on 6/7/08:

Ling cods should be any thing over 24 inches for ALL fishermen.

Non Resident - LINDY WEMPHE wrote on 6/7/08:

If you want to help the fish populations limit the commercial source. They take the majority of the fish.

Non Resident - DENISE ROY-RICHARD LEWIS wrote on 6/8/08:

Ling cod size limit should be any thing over 24 inches. For all.

Non Resident - PATRICIA SCHREINER wrote on 6/8/08:

Ling cod should not have a min. max. Size limit, at most over 24 inches. 24 inches size limit should apply for all other species.

Non Resident - THOMAS OXFORD wrote on 6/10/08:

There should be a minimum size limit of 15 lbs.

Non Resident - JOE PIZZOFERRATO wrote on 6/10/08:

I think it really sucked my first time fishing and there was a one fish halibut (daily) limit. I will not go for that again.

Non Resident - JOSEPH PIZZOFERRATO wrote on 6/10/08:

I was disappointed in the bag limits. It's an ocean for crying out loud. I watch on TV all the time these commercial fisherman catching tons of fish. I get to Alaska and can't?

Non Resident - HARRY CURTIS wrote on 6/10/08:

I visit Alaska about every two years. I don't like the fact that you are only allowed one king a day. It should be at least two a , or six a year for non residents.

Non Resident - CHARLES CLAUS wrote on 6/10/08

Recap of 2008 Guided Recreational Angler Comments

We come from Minnesota at considerable air line expense. We expect air line tickets to increase next year. If there is a very limited limit on fish we could not justify the expenses.

Resident - JOHN HODIER wrote on 6/10/08:

The one halibut limit will eliminates any future sport fishing trips to Alaska.

Non Resident - RICHARD O. MORSMAN wrote on 6/10/08:

I believe there should be a size limit on sport caught halibut of somewhere around 15-20 lbs minimum and a maximum size limit around 60-75 lbs.

Non Resident - GARRICK MARKOV wrote on 6/10/08:

I found it very unpleasant to find that our limit on halibut had been cut back from the 2007 season I personally believe 2 a day, no size limit, sound reasonable.

Non Resident - RICK MARKOV wrote on 6/10/08:

The economic benefit to the local economy must be tremendous. If the salmon/halibut and other catch continue to be cut back, you may loose me and my family. I'm sure others feel the same.

Non Resident - HERBERT RUDH wrote on 6/11/08:

Please apply the answers above to lingcod as well!! When I come to Alaska to fish I usually bring 3 to 5 fishermen besides myself. There are lots of other places in the world to fish. I am an American and proud of it. I'm sick and tired of politicians catering commercial and resident fishing and discriminating against sportsmen and citizens of this county.

Non Resident - BARRY GUMP wrote on 6/12/08:

Please increase daily halibut limit so I can return to Sitka.

Non Resident - LUNETTE SUPERTINO wrote on 6/13/08:

Federal and state laws prohibit discrimination for any reason, why are you discriminating against guided anglers?

Non Resident - STELLA CALLENTINE wrote on 6/14/08

This is a national, not merely a state resource. I was an Alaska resident and still feel strongly connected and treasure the oportunities to return and participate in the fishery.

Non Resident - DALE ERICKSON wrote on 6/14/08:

I feel the halibut resource is something that should be shared equally by all.

Non Resident - JOHN VALENSI wrote on 6/15/08:

The recent inquires between different state regions, is clearly discriminatory against charter industry. Also, there needs to be some limit to new charter boat enemies. All of my expenses are a direct benefit to Alaskan businesses.

Non Resident - E. RONALD JUCKSCH wrote on 6/15/08:

I figure all my expenses to fish Alaskan waters goes to better the Alaskan economy, and when these catch restrictions reduce my take of edible seafood to such an inflated level, I will start looking elsewhere to spend my hard earned money. It's discriminatory!

Non Resident - ARLON BERKHOF wrote on 6/17/08:

Commercial fishermen are taking out TOO many halibut and other species.

Non Resident - MAGGIE MURPHY wrote on 6/17/08:

Sports' fishing benefits the economy more than commercial fishing.

Non Resident - EDWARD KOOPER wrote on 6/17/08:

Sports' fishing benefits the economy more than commercial fishing.

Non Resident - ROGER A. LEMLCE wrote on 6/17/08:

Commercial fishermen are taking out too may halibuts.

Non Resident - JIM STRUVE wrote on 6/17/08:

Commercial fishermen should not be allowed to take as many halibut as they are taking.

Non Resident - FRANK CARR wrote on 6/17/08:

It's not fair that the limit on a private boat be more, then a charter boat!

Non Resident – GREG CARR wrote on 6/17/08:

I feel we support the community of Sitka, we love to fish and would be hesitant to come again if they lower the fish count.

Resident – TONY BOLOBNOW wrote on 6/19/08:

Need more certainty with regulations and changes. Some of us come great distances and do not need last minute changes.

Non Resident – C.E PETERSON wrote on 6/19/08:

Regulations and changes should be printed in time to make plans by January 1st - 15th (or even a year sooner!)

Non Resident – EDWARD FISSMAN wrote on 6/20/08:

There is no reason for us to travel all the way to Alaska, if there is a one halibut daily bag limit.

Non Resident – JIMMY DAULTON wrote on 6/20/08

I had a great time for my first trip to Alaska, even though the fishing was a little down we got some long ones. I personally think captain Jeff needs a raise, along with Levi they work hard and help with every little need. The food was great, the waters were excellent, and above all everything needed was done with respect.

Non Resident – FRED A. OSTRICK wrote on 6/23/08:

The best great time.

Non Resident – JOHN DAULTON wrote on 6/20/08

The fishing was great, the food was exquisite, I enjoyed myself immensely.

Non Resident – JAMES GRABICKI wrote on 6/21/08

I have fished in Sitka 6 out of the past 7 years.

Non Resident – KEN UHRICH wrote on 6/21/08

The one fish salmon limit has me ambivalent about returning to Sitka -- a one halibut per day would insure I will never return.

Resident -- CHRIS L. MATSON wrote on 6/21/08

The reduction in the daily king limit is frustrating; I would be inclined to fish elsewhere if Sitka also reduced the daily halibut limit, I have vacationed fishing here 4 times.

Non Resident – ROBERT BANNON wrote on 6/24/08

Treat all as one do no singer out one part of the industry because of perceived stock depletion in one area when this has been allowed to be false.

Non Resident -- MIKE SCHNOOR wrote on 6/25/08:

It is not feasible for me to come fish if we are only allowed one fish. We come to take fish home to eat. If limits are reduced we will consider not coming anymore to Sitka.

Non Resident – HOWARD JAQUITH wrote on 6/25/08:

I fish many days from Mexico to Alaska, Sitka is a wonderful town.

Non Resident – LARRY NEWMAN wrote on 6/25/08:

Discriminatory against different sport fisher's.

Non Resident – JEFF MARCHINI wrote on 6/25/08:

This discussion reflects heavily on whether I return to Alaska or not.

Non Resident – MATTHEW SCHNOOR wrote on 6/25/08:

Coming from California, you (feds) have already shut down sport fishing for me, and now you want to limit our fishing resource in Alaska.

Non Resident -- JACK W. SCHNOOR wrote on 6/25/08:

It is not economical to travel to Alaska without taking some fish home.

Resident – MARK GRINGLES wrote on 6/25/08:

I think the waste of commercial boats should be part of the equation. Charter/sport anglers don't ever take as much as the commercial long liners and trollers alike waste, or kill. I support the charter services.

Non Resident – DAVID A. HAYES wrote on 6/25/08:

Guided halibut fishermen should not be discriminated against in so far as daily or seasonal limits.

Non Resident -- JAMES BRENNER wrote on 6/25/08:

Guided halibut fisherman should not be discriminated against in daily halibut limits.

Non Resident – A. GARY REDDICK wrote on 6/25/08:

Guided halibut fisherman should not be discriminated against in daily halibut limits.

Non Resident – GREG KLUH wrote on 6/25/08:

This is a bunch of "bullshit"! Why should the "commercial industry" be allowed to "rope, pillage & plunder" the resource! I am outraged! We are all tired of bowing to the commercial industry.

Non Resident – TIM PELLISIER wrote on 6/26/08:

Fish & game or state agencies maintain deer, elk for sport hunting only – no commercial hunting – why is fisheries treated different!

Non Resident – DAVID HUDGINS wrote on 6/26/08:

I would never see Alaska, if not for fishing!!

Non Resident – RICHARD STEINY wrote on 6/28/08:

Fish are hard to catch!! Any limits will keep me from returning!!

Non Resident – DENNIS LOMAU wrote on 6/28/08:

I am not in support of a slot limit for ling cod.

Non Resident – KEVIN COX wrote on 6/28/08:

Ling cod should be allowed for longer season and bigger slot limit.

Non Resident – TIM FEEHAN wrote on 6/28/08:

I would like to catch more than 3 kings. That would cause me to come back more. Imposing a halibut limit would cause me not to come.

Non Resident – BILL DEPRIEST wrote on 6/28/08:

Taking away the 2 halibut limit would make me rethink my trip to Sitka.

Non Resident – SCOTT HUGHES wrote on 6/28/08:

While I enjoyed fishing here in Sitka and locations all over the world, I feel limiting the halibut bag limit will effect your fishery. It will certainly effect my wanting to come here for a single bag limit.

Non Resident – BRUCE WELLINGTON wrote on 6/28/08:

I will not return if I am limited to one halibut only.

Non Resident – ROXIE WELLINTON wrote on 6/28/08:

I would not return if limited to single halibut catch.

Non Resident – KENYON WELLINGTON wrote on 6/28/08:

I would not be coming to Alaska if I could only have one halibut per day.

Non Resident -- TISH DAVIS wrote on 6/28/08:

I would not return to fish in Alaska if I could only have one halibut per day.

Non Resident – ANDRUE WELLINGTON wrote on 6/28/08:

It would be pointless if I could only have one halibut per day.

Non Resident – MICHAEL J. HARMAN wrote on 6/29/08:

I feel that further restriction of the bag limit, as long as the runs are healthy, would cause me to rethink my fishing vacation is. There are alternatives such as Mexico and Canada.

Non Resident – KELLY HARMAN wrote on 6/29/08:

No annual halibut limit! With a limit of 1 most likely will not return.

Non Resident – TODD HARMAN wrote on 6/29/08:

No annual halibut limit. With a one halibut bag limit I will reconsider returning.

Non Resident – DOMINIC ZAMURA wrote on 6/29/08

If you change the harvest rules, I will not come back to Alaska, however, ling cods limits need to be changed.

Non Resident – JOHN HIX wrote on 7/1/08:

If Sitka has a one halibut limit, I will not be back, as it will be too cost prohibitive.

Non Resident – JUDY HIX wrote on 7/1/08:

No halibut bag limit. If Sitka has a one halibut limit, I will not be bag, as it will be too cost prohibitive.

Non Resident – STEFAN LONG wrote on 7/1/08:

I very much enjoy & hope to return to Sitka for fishing; however I would need to feel confident that I would be able to confidently return with halibut prior to booking my next trip.

Resident – WILLIAM HILLI wrote on 7/1/08:

No annual halibut limit!! I enjoy fishing in Sitka, however if halibut was limited to one per day I would not be back!!

Non Resident – RICHARD SCHWASNICH wrote on 7/1/08:

I do not want an annual halibut limit I feel that a one halibut limit will make it too costly to come back. The experience of fishing is great; I have fished in Alaska for 6 years. A limitation of any nature will definitely keep me from returning in 2009!!

Non Resident – STEVE SCHWASNICH wrote on 7/1/08:

If the bag limits continue to drop I will start going to B.C. or other locations. Economically, sport catch is a huge benefit to the local economy & any reduction in catch will affect the city of Sitka in a negative way.

Non Resident – CHARLES E. MCMLOSKEY wrote on 7/1/08:

No annual halibut limit! If such a limit is installed I will not be back! It is too costly for less and less fish.

Non Resident – HUGH VERANO wrote on 7/2/08:

Excessive limits on halibut will discourage any future chartering. This appears to me to be a brazen attempt by commercial fishing interest, to corner the market & drive out sport fishing.

Non Resident – JOHN SMAHA wrote on 7/2/08:

This was my third trip to go fishing for 3 days each time. Although expensive, the beauty of fishing in Alaska is that in addition to the beauty, fun and relaxation you get to bring home a significant amount of great eating fish. The salmon and ling cod limits are bad enough. Further limits on halibut will make it such that probably I would not return.

Non Resident – MARTIN OLGERSSON wrote on 7/2/08:

A one halibut bag limit would make me reconsider fishing in Alaska. I am also disappointed in the reduced ling cod of king salmon limits.

Non Resident – SHANE ANDERSON wrote on 7/2/08

No annual halibut limit. I would not come back if fishing was more limited.

Non Resident – JASON ANDERSON wrote on 7/2/08:

Sport fishing in Alaska is a wonderful opportunity for non-residents to be introduced to native Alaska salmon & halibut.

Non Resident – GARY ANDERSON wrote on 7/2/08:

Don't limit halibut annually we don't (sport fisherman) impact the industry that much & spend a lot of \$ in the community.

Non Resident – JASON ANDERSON wrote on 7/2/08:

I do not support a single halibut limit.

Non Resident – JILLIAN COATS wrote on 7/2/08:

The daily limit on halibut is a bad idea. Nonresidents will not impact halibut stocks with just two or three days of fishing.

Non Resident – ED MUSGROVE wrote on 7/2/08:

A reasonable (limit?) should be made. I don't believe a one halibut limit is reasonable. There is more than just saying one. A much better system would concern size (small: large) make it so there is proper reproduction and survival.

Resident – ALLEN MCCLOSKEY wrote on 7/2/08:

I guarantee that should you impose a one or two bag limit. I will not return to Alaska & I have been coming up here for 12 years. It appears you are trying to be too restrictive and will become too cost prohibitive. For both salmon & halibut – Why punish the people who love to catch our own fish?

Non Resident – JAMES GETTLE wrote on 7/7/08:

This is my first visit and I was thrilled to catch fish. I will not come back if the rate of catch is lowered.

Non Resident – RANDALL ANDERSON wrote on 7/8/08:

I would come back more often if I could catch more fish, especially halibut and ling cod and salmon.

Non Resident – MURRAY SHABSIS wrote on 7/8/08:

I would no longer consider spending \$3,000.00 for 3 days of fishing in Alaska if the halibut catch is reduced to one per day.

Non Resident – DAVIS TOOTHMAN wrote on 7/8/08:

Too many restrictions will influence future trips in a negative way.

Non Resident – RICHARD OUTON wrote on 7/8/08:

No fish, no Alaska vacation. I don't come for the sun!

Non Resident – JOHN CORNELL wrote on 7/8/08:

There should be no halibut limit! Why would I spend this kind of \$ for only 1 fish (per day)?

Non Resident – BRUCE GILMORE wrote on 7/8/08:

I've been fishing in Alaska for halibut 5 times but I hate to be priced out of this activity.

Non Resident – TIMOTHY S. GILMORE wrote on 7/8/08:

Every year costs go up (fuel/food/etc.) & more limits on the catch and it will be cost prohibitive to come here!!

non Resident – KEN MASON wrote on 7/8/08:

Could not afford to fish!

Non Resident – SANDI HEILMAN GETTLE wrote on 7/8/08:

I gave back an over the poundage of 30#'s because we had 30 #'s. The one we released was 100#'s plus – I was NOT HAPPY! More restrictions well definitely make me TAKE MY MONEY ELSEWHERE!!

Non Resident – DAVID DHALIN wrote on 7/8/08:

Limit amount I will not come.

Non Resident – TERRY MASON wrote on 7/8/08:

The decisions to reduce the halibut catch will definitely sway my decision, whether I return for Alaskan halibut, or any other fishing in Alaska.

Non Resident – JAIME T. LOVES wrote on 7/8/08:

No annual halibut bag limit. If Sitka has a one halibut daily limit I will not be back! It would not be okay for what I pay for there to be less fish I can keep.

Non Resident – RICK WETHERINGTON wrote on 7/8/08:

No bag limit on halibut. I will not come back for one fish (halibut).

Non Resident – LARRY EVERETT wrote on 7/8/08:

I would not spend this much money for only one fish daily bag limit.

Non Resident – TIMOTHY BECKINGHAM wrote on 7/8/08:

No annual halibut bag limit if Alaska. Sitka has a one halibut daily limit I would not be back! It is too cost prohibitive for less fish.

Non Resident – ALAN MCDONALD wrote on 7/8/08:

Recap of 2008 Guided Recreational Angler Comments

I do believe in fish and wildlife management, but as long as the fish population is healthy, I believe a two bag limit is not unreasonable nor excessive.

Non Resident – DAWN MCDONALD wrote on 7/8/08:

Conservation of precious fish is necessary; However, do not forget the many dollars sport fishing brings to Alaska. Keep the balance, reward good stewardship and protect the fishing experience for those visiting this beautiful area.

Non Resident – JOHN L. CLARK wrote on 7/9/08:

There should not be any annual limit for halibut if there is an annual limit I won't be back, also the 2 fish annual limit for king's – not good!

Non Resident -- JOHN L. CLARK JR wrote on 7/9/08:

No annual halibut limit. If Sitka has a one halibut daily limit I will not be back. It is too cost prohibitive for less & less fish. The two limit king salmon annually sucks I can catch more in my home town.

Non Resident – TONY SOLOMON wrote on 7/9/08:

No annual limit. If Sitka has a one fish limit it is not worth coming back. For the cost of a vacation less fish is not very cost effective.

Non Resident – SHERIE MASON wrote on 7/9/08:

No annual halibut limit! If Sitka and other Alaska fishing locations have one halibut daily limit, I will not be back. It is too cost prohibitive for less & less fish.

Non Resident – WAYNE MASON wrote on 7/9/08:

No annual halibut limit. Raise annual king Chinook limit from present amount. If Sitka has a one halibut daily limit, I will not be back! Had I known the Chinook limit was two annually, I would not have come this year!

Non Resident – SUE DUNN wrote on 7/10/08:

I feel halibut is one of my favorite fish. There should not be a limit of 1 halibut per day! We spend a lot of money to help support the fish recreation industry.

Non Resident – WILLIAM RAMOS wrote on 7/10/08:

I will not be back if Sitka has a one halibut daily limit. Too costly - I'll go to Mexico fishing.

Non Resident – KYLE RAMOS wrote on 7/11/08:

I have options to go to LaPaz, Mexico and spend my money. I would not support a one halibut limit.

Non Resident – PHIL JOFFE wrote on 7/11/08:

This restriction will be the "final blow" to fishing in Alaska. I have enjoyed seven years. This will be my last with the restriction pending, if passed.

Non Resident – MICHAEL RAMOS wrote on 7/11/08:

It's not worth the trip, if the halibut is limited.

Non Resident – DANIEL F. RAMOS wrote on 7/11/08:

Please do not institute a halibut limit. Alaska has always been known for its common sense – please don't become a California like state – it will destroy you. Do not impair and damage the local economies of the state.

Non Resident – TOM RAMOS wrote on 7/11/08:

An Alaskan fishing trip has been an annual trip for years. Every year the regs get more restrictive. It is coming to a point where it is not worth coming. \$4000.00 for ½ dozen fish, you do the math.

Non Resident – FRANK C. RAMOS wrote on 7/11/08:

We will go to Mexico!!!

Non Resident – KEVIN RAMOS wrote on 7/11/08:

Give me a break this is B.S. No annual limit on halibut. We don't catch that many compared to the commercial yahoo's.

Non Resident -- TIM O'BRIEN wrote on 7/11/08:

If the fishing is being depleted by fishing of any kind the number of catch should be controlled regardless of who is catching the fish. Commercial fishing should also contribute to the industrial survival.

Non Resident - W. KENT RAMOS wrote on 7/11/08:

No annual halibut limit. I will not come back if there is a halibut limit.

Non Resident - KAILAN DUNN JR wrote on 7/11/08:

I will not be back next year if this happens.

Non Resident - KAILAN DUNN wrote on 7/11/08:

We feel a one bag limit would discourage me from coming to go fishing in Alaska. The reason we come is we can get some fish to take home, as well as the fun of fishing.

Non Resident - OJ HARPER wrote on 7/11/08:

No annual halibut limit. If Sitka has a one halibut daily limit I will not be back. It is too cost prohibitive for less & less fish.

Non Resident - DENNIS MUNDROSKI wrote on 7/11/08:

I will not continue to visit Alaska if reduced halibut limits are imposed.

Non Resident - PETER BAUMAN wrote on 7/11/08:

If I am not allowed two halibut any size I would most likely stop taking my vacation in Alaska. This is my families' fish for the year.

Non Resident - CHARLES R. GRINER wrote on 7/11/08:

If halibut limits are changed I will not return!!!

Non Resident - JAY CASEY wrote on 7/11/08:

If these limits are passed, it will affect my check to come back or not!

Non Resident - JOHN BARS wrote on 7/11/08:

If I'm impacting the resource, I should have same limits as anyone who fishes.

Non Resident - JOHN H. PECK JR wrote on 7/11/08:

If Sitka has a one halibut daily limit I won't be coming back.

Non Resident - JOHN MCKIM wrote on 7/11/08:

Should the limit be reduced to one fish I will not return? The main reason I come is for the halibut.

Non Resident - DON K. CALLAHAN wrote on 7/11/08:

No annual halibut limit. because one fish does not justify the expense to come to Sitka.

Non Resident - MAURICE G. ROBBINS wrote on 7/11/08:

If these restrictions go into effect it will definitely curtail my visits to Alaska.

Non Resident - DOUG BAYER wrote on 7/11/08:

I will not return to Alaska to halibut fish if there is a one halibut bag limit. The commercial industry has too large of an allocation, more should be allowed for the charter industry.

Non Resident - EDWARD COULTER wrote on 7/11/08:

To significantly restrict the "charter" industry and not restrict the commercial or private fishing groups is discriminatory and beyond reason.

Non Resident - STEVE C. JENSEN wrote on 7/14/08:

By continuing to limit or restrict sport fishing for charter services with less ability to acquire fish. - It will continue to discriminate against Guide's Services that I desire.

Non Resident - BLAKE BREI wrote on 7/15/08:

No annual halibut limit. If Sitka has a 1 halibut bag limit, I will not be back, I love to fish!! I worked very hard.

Non Resident - ROBERT BREI wrote on 7/15/08:

No annual halibut limit, if Sitka has a one halibut limit I will not be back. I will go to San Diego it is too cost prohibited for less and less fish of a bag limit. Halibut is the preferred fish in our family.

9 Non Resident –ROBERT DON wrote on 7/15/08:

Too far to travel for one bag limit - I will go somewhere else closer.

1 Resident –KENNETH DON wrote on 7/15/08:

I will go somewhere else if this is put in place. Charter companies should be favored because they bring outside money into the local economy. I will not recommend this place to my friends and family if there is a new limit.

Non Resident –PHILLIP DON wrote on 7/15/08:

I would go to San Francisco, California to catch halibut instead.

Non Resident –COLIN DON wrote on 7/15/08:

No annual halibut limit, if there was a limit I'm likely would not bother coming back. Too expensive for one fish. I would be pissed because it seems discriminatory.

Non Resident –NORMAN DON wrote on 7/15/08:

No annual halibut limit. A one fish bag limit will be cost probative for me to come again. Sport fishing is such a small percentage of take.

Non Resident –DAN KLEMMEDSON wrote on 7/15/08:

Discriminatory Policy to limit charters - Revenues derived from out of state anglers to Alaska Tourist Economy significant.

Non Resident –DEAN HOUSEWER wrote on 7/15/08:

If this is the only way I can access the halibut and the limit is reduced to one I will most likely choose somewhere else to spend my tourist dollars and support some other community.

Non Resident –CLIFFORD W. CORNELLIUS wrote on 7/15/08:

Please do not cut down halibut limit- charter should not be limited one halibut only, when other enterprises can have more. This is important to the economic here, I'm likely to not return here if I can only keep one (per day).

1 Resident –OWEN KAISER wrote on 7/15/08:

If you cut back amount of King, Coho, Halibut, I will probably go to Canada to fish.

Non Resident –MARK DONOVAN wrote on 7/15/08:

I would fish British Columbia if Alaska was to initiate a short sighted bag limit of one halibut per day). From a cost analyses basis this would be foolish.

Non Resident –DEREK DONOVAN wrote on 7/15/08:

No annual limit. That would extremely piss me off. There is enough halibut in those waters to be caught without a limit. It will lose the charter companies a ton of money. I know I wouldn't be back.

Non Resident –BRIAN MURPHY wrote on 7/15/08:

Limits reduce my likely return in the future.

Non Resident –JASON KIRKLAND wrote on 7/15/08:

Fishing trips are worth it if there is plenty of fish to catch. If there was only a 1 halibut 1 bag limit I would probably not return since it would be not effective cost wise. However, I do understand the need for conservation -- but should be done on the commercial level - not by individual anglers.

Non Resident –RON FINNICUM wrote on 7/15/08:

Need to keep ling cod. Catch 4-5 ling cod for every halibut.

Non Resident –DAVE JEWELL wrote on 7/15/08:

No annual halibut limit. If Sitka had a one halibut limit the amount of fun and food would be less. I will never return.

Non Resident – DAN PROCTOR wrote on 7/15/08:

If there is a 1 fish limit I will not return to Alaska on my vacation, It would not be worth the one fish (daily).

Non Resident – GEORGE W. BOWEN wrote on 7/15/08:

No annual halibut limit! If Sitka has a one halibut daily limit, I will not be returning. The cost is prohibitive for less fish and much more \$ per pound.

Resident - GLENN NELSON wrote on 7/15/08:

No annual halibut limit. If Sitka has one halibut daily limit I will not be back. It's too costly and not no fun.

Non Resident - ROBERT F. MCCARTHY wrote on 7/15/08:

The one fish daily limits on halibut and other fish species. will most definitely cause me to stop chartering and fishing in the state of Alaska.

Non Resident - DON DANIELS wrote on 7/15/08:

If a one halibut limit is imposed I'll be fishing elsewhere. It would be too expensive for too little bag limit.

Non Resident - SLA STEPHENS wrote on 7/15/08:

We will not return under the one fish (halibut) limit. The cost of getting here will be prohibitive without the ability to catch more fish.

Non Resident - MICHAEL P. CULLEN wrote on 7/16/08:

No annual halibut limit. The cost will be too much for the amount of fish I will be allowed to catch -- keep.

Non Resident - SONJA ZINNIKER wrote on 7/16/08:

We have lots of other options to spend our vacation dollars. If we travel across the USA to get to our destination to fish - it should not be limited in the discriminatory manner that the NPMFC has regulated.

Non Resident - KARAN CULLEN wrote on 7/16/08:

No annual halibut limits annually - we want to come here to fish - if we do not get to take fish home - we will no longer come here. We sure did not come for the sunshine.

Non Resident - JOHN ZINNIKER wrote on 7/16/08:

I usually fish in Mexico - this is my first trip to Alaska - because of USA economy. I thought to spend vacation dollars in Alaska - very disappointed by regulations and restrictions of state and NPMFC - Next year possibly more sun in Mexico - not much in Alaska.

Non Resident - MATT KUHNS wrote on 7/16/08:

No annual halibut limit. If Sitka has a one daily halibut limit I will not be back! Cost too much for less fish.

Non Resident - LISA WILKERSON wrote on 7/19/08:

It costs way too much money to just be able to only have 1 halibut and I would not come back if it gets to only 1 halibut a day.

Non Resident - DEAN B. WILKERSON wrote on 7/19/08:

If Sitka has a one halibut daily limit I will not be back. It costs too much for less fish.

Non Resident - BRETT JOHNSON wrote on 7/19/08:

No annual halibut limit. It is too expensive to come to Sitka for one halibut. I will not return if, I am only allowed one!

Non Resident - HOWARD M. JOHNSON wrote on 7/19/08:

I do not agree with the one halibut limit or any size restrictions if it changes to that I will not return. It's just too costly.

Non Resident - MIKE JARVIS wrote on 7/19/08:

NO annual halibut limit. It isn't worth the trip up there for one halibut. Take a trip to Canada, cheaper & more fish!

Non Resident - TOM RICE wrote on 7/19/08:

Sport anglers should be treated the same as private in terms of fish limits.

Non Resident - JOHN SATTEM wrote on 7/19/08:

If you reduce the halibut limit I may not come back due to costs versus fish.

Non Resident - JOHN C. NODOLF wrote on 7/19/08:

Not worth coming up for 1 halibut a day.

Non Resident - DWIGHT GUNDERSON wrote on 7/19/08:

I believe there should not be a halibut limit if Sitka has a halibut daily limit I will not be back as it is too cost prohibitive for less and less fish.

Non Resident - KEVIN BRITTEN wrote on 7/19/08:

Halibut is the main focus of the trip for me with any reduction in allowance I will not come back to Sitka for fishing in the future.

Non Resident - BRIAN BRITTEN wrote on 7/19/08:

Limiting halibut would make fishing cost prohibitive.

Non Resident - TONY ALVES wrote on 7/19/08:

I LOVE HALIBUT

Non Resident - ROBERT J. HAMILTON wrote on 7/19/08:

No annual halibut limit. Trip too expensive for one fish limit (daily).

Non Resident - AARON HAMILTON wrote on 7/19/08:

No annual halibut limit. If there is a one halibut limit it is too cost prohibitive to catch that few fish.

Non Resident - MIKE SHINDELAR wrote on 7/19/08:

No annual halibut limit. If Sitka chooses to stay with a one halibut daily limit, I will not be coming back. It is too cost prohibitive for less and less fish.

Non Resident - STEVEB SIMMONS wrote on 7/19/08:

I will not be back if there is a limit. The cost for fishing would not justify what I could take home.

Non Resident - THOMAS S. SWINK wrote on 7/19/08:

I wish to be treated fairly, as a citizen of the USA. If fishermen come my state, SC they are treated the same as our residents as long as they buy licenses.

Non Resident - JAMES SHINDELAR wrote on 7/19/08:

No annual halibut limit. If Sitka has a one halibut daily limit I will not be back. It is too cost prohibitive for less and less fish.

Resident - BILL RICE wrote on 7/19/08:

As a resident, I do not own a boat but want to fish for halibut. My time is limited and I only go once a year & guided boat is the only option for me. I would understand if there was a problem with the resource, but even so, I think it's a bit disproportionate between sport and commercial.

Non Resident - RICHARD SMENTKOWSKI wrote on 7/19/08:

If halibut bag limit is reduced I will be considering not returning to Sitka or any other part of Alaska for fishing or vacation.

Non Resident - EDMUND CASSELLA wrote on 7/19/08:

BE FARE, let everyone make a living!

Non Resident - GARY POLYAK wrote on 7/19/08:

I was up here in Sitka in 2005 with very good fishing. The king salmon this year was totally ridiculous. I didn't get a chance to bring home 1 king!

Non Resident - JAMES SMENTKOWKI wrote on 7/19/08:

Cost too much for less fish!!!

Non Resident - DAVID BECKER wrote on 7/19/08:

No annual halibut limit. I will not return with a halibut limit of one a day. It is too cost prohibitive.

Non Resident - KRIS ARCHER wrote on 7/19/08:

There shouldn't been a halibut limit next year would be hard pressed to return for anything less then this year. The cost is not worth the amount of fish allowed.

Non Resident - RANDELL D. ARCHER wrote on 7/19/08:

I think we should be able to take at least one king and one cod on our trip I know it is a conservation issue but still--- Make the same rules for everyone, do not discriminate!! Haven't you heard other government agencies preach non-discrimination!!

Non Resident - DAVE PARKER wrote on 7/19/08:

With the restriction on king salmon and ling cod, halibut restriction would cause me to not return at as a fisherman.

Resident - BILL BRILL wrote on 7/20/08:

If the bag limits on halibut goes down to 1 fish per day, I will catch my halibut on the Oregon coast, on a charter boat. My money will be spent elsewhere, not in Alaska.

Resident - JIM RICE wrote on 7/20/08:

If we are allowed only one halibut per day then that is discriminatory against the charter people. They contribute greatly to the economy of Alaska and deserve to be treated equally, this is not conservation issue.

Non Resident - PHIL THELEN wrote on 7/20/08:

If this continues I will find somewhere else to fish.

Non Resident - DAVE VAN MALSEN wrote on 7/22/08:

If a one halibut per day limit is imposed, I would have to consider fishing somewhere else!

Non Resident - PAUL SCHAFFRAN wrote on 7/22/08:

No annual limit on halibut. If Sitka has a one halibut a day limit I will not come back. With the closing of king season on July 15th now, if you cut the halibut also, I won't come back to Alaska.

Non Resident - ERIK SCHAFFRAN wrote on 7/22/08:

I do not want an annual halibut limit! It is much too costly to travel to and fish in Sitka when I get less fish every year. If this continues, I will travel elsewhere for my fishing excursions.

Non Resident - JACK BRANDMUELLER wrote on 7/22/08:

No annual halibut limit.

Resident - R.D. BRADBURY wrote on 7/23/08:

For us to come this far, we would like to be able to catch our limits as in years past. The kings & lings cod population seems better than in years past.

Non Resident - WARREN R. BLAKLEY wrote on 7/23/08:

I believe there should not be annual bag limit on halibut for guided sports fishermen. It is getting cost prohibitive to come here and be allotted less fish every year. We also miss not being able to keep ling cod.

Non Resident - KEVIN SCOTT BRADBURY wrote on 7/23/08:

I do not want an annual halibut limit. If one fish limit is put in place in Sitka I will not come back. With no ling cod or kings in July, the cost will be way too much for the available fishing left. The restriction on ling cod is unfounded by the number I caught & released.

Non Resident - TODD BROWN wrote on 7/23/08:

With continued limits reductions on both kings and halibut I doubt we'll come back for charter trips. I realize declining resources should be managed, but it seems to more adversely affect the charter groups and clients disproportionately.

Non Resident - KAREN HANDLEY wrote on 7/23/08:

No annual limit on halibut. The limit for sport fishermen should be increased and commercial should be decreased. This will stimulate your economy, increase your tax revenue and not hurt you halibut population.

Non Resident - RICHARD HANDLEY wrote on 7/23/08:

No annual halibut limit. If you limit the halibut you will have less fishermen. The price will have to go up and that will limit the number of fishermen again. That means less tax money also

Non Resident - MICHAEL K. CREBBIN wrote on 7/24/08:

No annual halibut limit. If Sitka has a one halibut daily limit I will NOT be back! Too expensive for not enough fish.

Non Resident - CAROL CREBBIN wrote on 7/24/08:

No annual halibut limit. If Sitka has a one halibut daily limit I am not coming back! Too expensive for not enough fish.

Non Resident – GEOFFREY STATHOS wrote on 7/24/08:

No annual halibut limit. I spend a lot of money in the community of Sitka like gold jewelry, Alaskan native art pieces, fine dining, etc. keep restricting my fishing I will travel another part of the world.

Non Resident – ELIZABETH JONES wrote on 7/24/08:

Please... no annual halibut limit! Besides spending my money for the charter, I also love to shop at Brenner's and Mountain Miss, as well as Goldsmith Gallery. I love Sitka for my annual vacation, but with a one halibut limit, it sounds like Sitka doesn't want me back.

Non Resident – GARY P ALLEN wrote on 7/24/08:

No annual halibut limit. If Sitka has a one halibut limit and no king salmon limitation I will absolutely not be back. It is much to expensive to come to Sitka for less and less fish!

Non Resident – MARCIA ALLEN wrote on 7/24/08:

No annual halibut limit. If Sitka has a one halibut daily limit I will not be back! It is too cost prohibitive for less and less fish.

Non Resident – BETH PETERS wrote on 7/24/08:

Please don't impose a bag limit. We will not return for fishing if a bag limit is imposed. We spend a lot of money while here and won't be back if a limit is imposed.

Non Resident – BARRY PETERS wrote on 7/24/08:

Limiting the number of halibut I can take per pay will hurt the economy of Alaska way more than the benefit of the fishery for my small % of halibut take should I chose not to return.

Non Resident – CHARLES HEDIN wrote on 7/24/08:

If would not be fair o the person who chooses to use a charter service. The salmon size is bad enough if you continue to restrict the fish I will o longer spend my fishing dollars in Alaska.

Non Resident – TAMMY ALLISON wrote on 7/24/08:

No annual halibut bag limit! We come to this great state to do fishing and if you take the halibut to only one then we probably will not come back. You need to be fair with all fishing establishments.

Non Resident – JULIE MCCULLOUGH wrote on 7/24/08:

No annual halibut bag limit! If Sitka has a one halibut bag limit I will not be back! It cost too much for one halibut a day!

Non Resident – KENNETH W. PADGHAM wrote on 7/24/08:

If the general tax payers feels that gas prices are high-try paying \$80.00 to \$100.00 per pound for fish-and that's on a good day. This will be my last trip to Alaska-because of the limited fish limits.

Non Resident – JUDY PADGHAN wrote on 7/25/08:

No annual halibut limit! If Sitka has a one halibut daily limit I will fish else where. Can not justify expenses for less fish we like to eat halibut.

Non Resident – SHANNON WILLIS wrote on 7/25/08:

This is my 2nd time to come and stay + spend money in Alaska in hopes to see the land and experience fishing! I am hoping to come back and have more fish to enjoy in my freezer. I hope the fish and game will use wise regulations with all parties.

Non Resident – KRISTA K.H. MENELY wrote on 7/25/08:

No halibut limit. If Sitka has a one only halibut daily limit I will not be back! And king salmon (zero this year!) it costs too much to not be allowed to catch fish-maybe expand the ling season?

Non Resident – BARBARA A. MORGER wrote on 7/26/08:

I want no annual halibut limit. If one halibut daily limit is enacted, I will probably decide to go elsewhere for my vacation.

Non Resident – GARY STEWART wrote on 7/26/08:

I think you are on a path of extinction for the charter folks in Alaska --fishing is close and tied to all of your tourists dollars, Alaska, Canada and even Washington are providing excellent fishing packages for the fisherman and tourists.

Non Resident – KATHY BABINEC wrote on 7/26/08:

NO ANNUAL HALIBUT LIMIT!

Non Resident – CARDON WILLIS wrote on 7/26/2008

Would like to see the two halibut limit remain.

Resident – DAVID WILLIS wrote on 7/26/08:

We come to Alaska partially for 2 limit a day on halibut. I can get 1 a day in Oregon. I will probably stay and fish in Oregon if limits are reduced.

Non Resident – KAREN STRINGER wrote on 7/26/08:

I cook the fish my husband brings home. We enjoy the Alaska fish very much. Unfortunately, these new fish limits have been disappointing. I doubt we will continue to travel so far for so little return.

Non Resident – ASRIPINA V. BUSTAMANTE wrote on 7/26/08:

No annual halibut bag limit. If Sitka has a one halibut daily limit I'll not be back! It is too cost prohibitive for less and less fish.

Non Resident – HIROSHI YAMAUCHI wrote on 7/26/08:

The commercial political lobby has an unfair advantage in forcing unfair decisions against to sports fishing industry; a similar situation exists in California you are forcing me not to return to Sitka.

Non Resident – DR. RANDALI WEST wrote on 7/26/08:

Do not have/ enforce or even suggest a 1 day halibut limit! - Or I won't fish in Alaska at all. Its bad enough to not be able to keep; ling cod and king salmon- I might go to Mexico and buy fresh salmon and halibut at the fresh market.

Non Resident – PETER E. SEDA wrote on 7/26/08:

If Sitka or anywhere in AK has a 1 halibut daily limit I will not be back. I would rather fish in Russia! Also you're salmon restrictions SUCK!!

Non Resident – DON WIMBERKY wrote on 7/26/08:

No annual halibut limit! It's not worth the expense for the trip-for this fish limitation!

Non Resident – JEREMY SEDA wrote on 7/26/08:

No annual halibut limit! If Sitka has a one halibut daily limit, then I will not be back! It is too cost prohibitive for less and less fish. Halibut definitely is the preferred fish to eat in my household.

Non Resident -- DARYN FILLIS wrote on 7/26/08:

I come here for the amazing experience with friends and family. That being said however, I come for the meat! If I am unable to keep what I catch I won't come back. Eating what I catch is part of the magic.

Non Resident – STEVE NAGATA wrote on 7/26/08:

I would not come back to Sitka if limited to a one halibut bag limit. Please go away with the annual halibut bag limit! It is not worth my time or money to come back if I don't get fish!

Non Resident -- TOSHI OGURA wrote on 7/26/08:

No annual halibut limit, if Sitka has a one halibut limit I will not be back.

Non Resident – DOROTHY TERUYA wrote on 7/26/08:

NO ANNUAL HALIBUT LIMIT.

Non Resident – EDWIN M TANAKA wrote on 7/26/08:

No annual halibut limit, if Sitka has one halibut limit I will not be back it's too cost prohibitive for less and less fish.

Non Resident – IMOGENE CROWELL wrote on 7/26/08:

No halibut limit, if Sitka has a one only halibut daily limit I will not be back and the king salmon (zero this year) it costs too much to not be allowed to catch fish-maybe expand the ling cod.

Resident – NELSON NAGATO wrote on 7/26/08:

As this trip dated 7-22-08 to 7-27-08. I find it difficult to continue to return.

Non Resident - DAVID CASTOR wrote on 7/27/08:

The limits proposed are most discriminatory against sports fisher persons and are most unfair.

Non Resident - JEREMY CASTOR wrote on 7/27/08:

If the limit is made to be one daily, this will be my last trip to Alaska.

Non Resident - GLYMM STRINGER wrote on 7/27/08:

If Sitka has a one halibut limit I will not consider it worth my time and money to come back to Alaska to fish!

Non Resident - CASEY TIPPETTS wrote on 7/29/08:

No annual halibut limit, if Sitka has a one halibut daily limit I will not be back! It is too cost prohibitive for less and less fish.

Non Resident - WILLIAM E. BAUMGARTUR wrote on 7/29/08:

Halibut meat is why I come here. The daily limit will have drastic effect on that!

Non Resident - RANDY J. WARNKE wrote on 7/29/08:

Do not have an annual halibut limit!

Non Resident - MIKE MARGAREIDGE wrote on 7/29/08:

With a one fish limit on halibut, I would not return.

Non Resident - LANCE PHILLIPS wrote on 7/29/08:

If there was a one limit on halibut it would not be worth coming up here for.

Non Resident - DAVID RAEL wrote on 7/29/08:

If you change from 2 to 1 halibut per day I will probably not return next year. We primarily fish for halibut.

Non Resident - MICHAEL STRAHAN wrote on 7/29/2008

People follow reasonable rules but a one halibut limit would mean catching a halibut and putting in hold and if you caught a larger one later you would release the previous smaller halibut. This may sound terrible but is realistic.

Non Resident - CHRIS SCHEELER wrote on 7/29/08:

No annual bag limit or I will not be back to Alaska to spend my money.

Non Resident - CRAIG SCHEELER wrote on 7/29/08:

It cost too much to come to Alaska for one fish.

Non Resident - J.B SKINNER wrote on 7/29/08:

Leave bag limit plentiful.

Non Resident - GLEN SCHEELER wrote on 7/29/08:

No annual halibut limit, cost too much to do this to us I won't be back if this happened family loves halibut leave this thing alone!

Non Resident - PHILLIP RAEL wrote on 7/29/08:

I had a great time in Alaska and plan on coming back as much as possible. If the bag limit is changed from 2 fish to 1 I will not come back to Alaska. Halibut is why I came and why I will be coming back.

Non Resident - KARI. D. FECHNER wrote on 7/30/08:

These should be a no halibut limit restricting limits causes recreational \$ dollars to go to other places.

Non Resident - JAMES SPRINGER wrote on 7/30/08:

I recently returned from a trip to Hawaii where I feel welcome this is my first trip to Alaska and I have never felt less welcome, which is apparently due to excessive greed by commercial fisherman, I enjoyed myself but if I am denied my right to fish and keep my catch I will take my tourist dollars elsewhere, and obviously I will warn my friends. Alaska is beautiful but unfriendly not a great state motto.

Non Resident - STEPHEN J. GEORGE wrote on 7/30/08:

Please no annual halibut limit. I cannot justify coming to Sitka if there is a one fish limit. (cost factory)

Non Resident - PAUL LEWIS wrote on 7/30/08

This is the yearly trip for my friend and buddy. If they put a one halibut limited we would not come back. As there is 16 in my party times 3,000 that's 48,000 we spent.

Non Resident – Charles Fouquette wrote on 7/30/2008:

No annual halibut limit! If Sitka had a one halibut daily limit I won't be back. It cost too much for less product every year to fish. I want to be able in the future to take our children. Mexico's 5 fish limit over halibut (tweak to 300# Wahoo. Per species per day 3 dozen possession limit.

Non Resident – JOE AMAGRANDE wrote on 7/30/08:

No annual halibut limit!! If Sitka has a one halibut daily limit I will not be back! It cost too much for less and less fish, I fish Mexico for much more fish and less money.

Non Resident – MILTON R. TAM wrote on 8/01/08:

I would probably fish elsewhere if there was a halibut limit in Sitka waters.

Non Resident – MIKE TOM wrote on 8/01/08:

Not worth coming to Alaska for one halibut! Cheaper to stay home and not come for one fish, per day.

Non Resident – TOSHIYAKI MASUDA wrote on 8/01/08:

I will not be back if there is a one halibut limit.

Non Resident – DONALD S.C. YOUNG wrote on 8/01/08:

I disagree with an annual bag limit. If Sitka has a one halibut bag limit, I will not be back. It is too cost prohibition for me to pay for less and less fish.

Non Resident – MARK LOSTROM wrote on 8/02/08:

Debate the financial & numerical dominate of the commercial fisherman for this resource, they do not own resource. Access to it should be equally and equity affected if any chances are made.

Non Resident – SCOTT DINES wrote on 8/02/08:

It costs too much to fly up here & fish for less fish!!

Non Resident – DEVIN DURRANT wrote on 8/02/08:

No annual limit on halibut.

Non Resident – WM. BRYSON BENNETT wrote on 8/02/08:

No annual limit on halibut.

Non Resident – RONALD W.S. TOM wrote on 8/02/08:

If Sitka reduces the halibut to one I won't be back. If I can be guaranteed one halibut weighing at least 60 lbs. I might reconsider. There are other Hawaii residents that will not return because of the increase cost only to be insulted with only 1 halibut. Please don't take away our opportunity to catch 2 halibut per day. Thank you.

Non Resident – JIM DESMOND wrote on 8/02/08:

Please no annual halibut limit the cost of this is prohibitive I have full access to fishing.

Non Resident – JERRY DESMOND wrote on 8/03/08:

If halibut is limited to one per day I most likely will not consider south west AK for meeting my sport fishing needs.

Non Resident – ELDON MUNDORF wrote on 8/05/08:

I come to Alaska to fish but mainly for halibut. It is our favorite. There should be at least a 5 halibut limit and if Sitka goes to a 1 halibut limit I will spend my money fishing for walleye on the mainland & not return to Alaska.

Non Resident – E.A. SCOTT wrote on 8/05/08:

Please let us catch king salmon.

Non Resident – JOHN GROSS wrote on 8/05/08:

If a 1 halibut limit is placed I will not return. With no red + no king salmon I can stay home + fish a lot more with no limits!!

Non Resident WILLIAM SITZ wrote on 8/05/08:

Recap of 2008 Guided Recreational Angler Comments

We book this "trip a lifetime" in Alaska in January of 2008 because of the lack of accommodation and space. I will not come back if there is a 1 halibut limit and I want to keep at least one king. I come for the halibut to eat and thrill of the catching salmon... especially king salmon. It seems very unfair to let the commercial fishermen have more halibut than me!

Resident - BRAD RODGERS DUM wrote on 8/05/08:

Just because I choose to charter a boat is discriminatory to me only hoping 1 halibut per day.

Non Resident - MALVERN F. WORTH wrote on 8/05/08:

I did not come here to throw away king salmon.

Resident - JON MUNDORF wrote on 8/05/08:

I would like bigger halibut limit I may not come back to Alaska if the halibut and king salmon regulations stay as is. It does not make sense.

Non Resident - DARRELL MUNDORF wrote on 8/05/08:

Would appreciate at least one king salmon, ling cod for each fisherman per day.

Non Resident - FRANCIA Y DORAN wrote on 8/05/08

It seems very unfair not to be able to keep any king salmon this year. They were very plentiful. Every boat had to release from 1 dozen to 2 dozen every day even though we tried not to fish the bottom. Why no lings till august 15? Why not allow 1 or 2 lings per season for everybody?

Ps: I have been fishing in Alaska for 16 years.

Non Resident - JASON WITHROW wrote on 8/06/08

If Sitka changes the limits to one halibut per day I may choose not to come back. Without being able to catch lings or kings halibut is very important?

Non Resident - DENNIS CLARSON wrote on 8/06/08

No annual halibut limit please, Alaska is for all USA and Americans to enjoy at affordable rate, Alaska is not just for bureaucrat, environmentalists and Alaskans fish companies. I fish for halibut and kings; also halibut is my favorite fish one fish limit not in best interest of American and small business.

Non Resident - ROY DAVID HITE wrote on 8/06/08

No annual halibut limit. Too cost prohibitive for less fish. We will need to be less restricted in this species for a good bag limit.

Non Resident - JIM H SAKO wrote on 8/06/08

My family prefers halibut vice the others fish I bring home. If a one halibut limit is imposed I will fish elsewhere and my money goes with me I see no cogent reason to single out the guided fishing industry. The dollars it brings to Sitka/Alaska must be a lot the arbitrary size limit i.e. must be greater than 48 inches, seems to be applied to the Sitka area at this time. Friends fished the Kenai River last week (end of July 2008) and they told me there wasn't such a slot limit on kings we (our party) caught and released upwards of two dozen kings. It would seem reasonable to allow a catch limit of one a day or even one a fishing trip. I am very disappointed with the present rule, especially when it is reported that a record return of kings is entering the Columbia River.

Non Resident - GERALD A. ZEITLER wrote on 8/06/08

I am also opposed to the slot limits on king salmon. I can catch and release at home + not have to go to the expense of fishing in Alaska; the slot size is ridiculous (48 inches)

Non Resident - HALE C. KELLER wrote on 8/06/08

Clearly this fish limit restriction means I'm paying more for less fish! Not an economic smart choice is it? I've come to Sitka for 10 years. Three years ago I could not keep the ling cod I caught...and I still cant, now, I can't keep king salmon because of and 48 inches limitation. It's a discrimination regulation that is ill conceived. This is probably my last trip because of this current, hastily passed legislation.

Non Resident - CHARLES HACKMAN wrote on 8/06/08

We fish the last week of July or first week of august. The past 3 years we haven't been able to keep a ling cod + we have ght some beauties. I don't understand your king salmon restrictions when we catch and release six to twelve kings a day.

Non Resident - MIKE ABDELNOUR wrote on 8/06/08

No halibut limit and bring back the king salmon – you will lose my business and I will take it to Canada!!!! Use more business sense! I have been coming to Alaska for 6 + years!

Non Resident – ERIC HAKANSON wrote on 8/06/08

I came to Alaska to fish not sit in the sun shine (I live in California there plenty of sunshine) if the limits don't change we wont be coming back (think about sport fishing).

Non Resident – JASON W. BARNIS wrote on 8/06/08

If it was to change to 1 halibut I would not be inclined to return.

Non Resident – WILLIAM V. KINGSTONE wrote on 8/06/08

We are only allowed to catch one king, and being over 48 inches that is almost impossible and if the halibut is reduced I cant justify spending that kind of money (also with no ling cod)

Non Resident – JOHN FIDANZA wrote on 8/06/08

No annual halibut limit. If Sitka has 1 halibut daily limit I will not come back!

Non Resident – GEORGE F. GERBING wrote on 8/06/08

Aside from the above commentary I strongly object to the king salmon restriction after 7/15/2008 to a non resident! Fish over 48 inches. This is not only stupid it is highly discriminatory – if I wanted to go to a catch and release facility that would be my choice you took the thrill out of my long planed vacation my wife and I happened to prefer king salmon – bad decision – get your act in order – your ling cod restrictions are really silly

Non Resident – RICHARD JITSUMYO wrote on 8/06/08

With prohibiting limits on king salmon and on ling cod I feel that there should be no annual halibut limit. Also it isn't fun to throw fish back. My family loves halibut meat.

Non Resident – BYAN TYLER wrote on 8/07/08

I can't believe that you folks want to go to a per day schedule on the halibut! This is insane! I see this as a way to ruin everything that we come here for! Also the king situation sucks! (Wake up)

Non Resident – MARTHA BROOKS wrote on 8/12/08

As a non fishing guest our family enjoy the fish my husband catches. It would be nice if he could catch more halibut.

Non Resident – CHARLES PAUL wrote on 8/12/08

I would not have come to Sitka if the catch limit had remained at one fish (halibut). If you choose to go to a one fish limit I will not return. Our family prefers halibut over other fish; I do not fish Washington due to a one fish limit.

Non Resident – KENNETH COPLIN wrote on 8/12/08

I do not object to limits when necessary, but to make one group only responsible is not right.

Non Resident – ROBERT HOFFMAN wrote on 8/12/08

Imagine a sport fisher traveling to Alaska spending about 3,000.00 with the following rules in place! 1 – No king salmon (within reason) 2 – no ling cod, 3 – only 2 (possibly 1) halibut, get a clue!!

Non Resident – KEITH HOFFMAN wrote on 8/12/08

I travel to Alaska at least once every year.

Non Resident – DON HOFFMAN wrote on 8/12/08

The same comments apply to king salmon. No limit!! Is not fair!! Sports fisherman only takes about 20% or less of the fish, support the local lodges and business, and are not being treated well.

Non Resident – GARY ODOM wrote on 8/12/08

The halibut limit is very important to my decision to return to Alaska to fish.

Non Resident – JAMES E NICHOLS wrote on 8/13/08

Why the halibut limit? I m not sure if I will return as bag limit increase.

Non Resident – RICHARD CORDEIRO wrote on 8/12/08

No annual halibut limits! If Sitka has a one halibut daily bag limit "I will not be back"

Non Resident – AL GUZMAN wrote on 8/12/08

No kings, no lings, now you want to restrict butts! Ill spend my vacation dollar in another state that supports sports fisherman lead of slowly cutting off the joy of this sport. Keep it up and you'll kill the golden goose.

Non Resident – JACK RICHARDS wrote on 8/11/08

The limits in place today (august 2008) are much more restrictive than when I booked the trip. All halibut were limited further. I would not book again.

Non Resident – DONALD BUNCE wrote on 8/12/08

I do not support annual halibut limits. my family enjoys halibut. If you impose this limit. I will not return! Why limit the ling cod? I would much prefer the variety. and they do seem to be plentiful I would really like to return, but you are making it difficult.

Non Resident – JACK R. KASPER wrote on 8/12/08

No annual halibut limit- if Sitka has a one halibut daily bag limit. I will not be back. It is too cost prohibitive for less and less fish. Halibut is the preferred fish to eat in my family. A one halibut daily bag limit for guided anglers is discriminatory ~ I will spend my vacation money where fishermen are welcome for money they bring to costal communities, I did not come for the sunshine.

Non Resident – ROGER H. ROULETTE wrote on 8/12/08

No annual halibut limit. I will not come back for only 1 halibut per day.

Non Resident – ROGER M ROULETTE wrote on 8/12/08

I will not come back if there is a one halibut limit per day.

Non Resident – GERALD HUDGENS wrote on 8/12/08

No halibut limits. It cost too much to make this trip if I can't have a chance to take all my fish home.

Non Resident – THOMAS M HUDGENS wrote on 8/12/08

No annual halibut limits, if there is only one halibut a day limit I will fish somewhere else. Ex: Ontario, closer and less money for no fish!! Guided trips should have the same opportunities as not guided trips.

Non Resident – MELVIN BURKHARDT wrote on 8/12/08

I have come here 5 times in past 9 years. To reduce halibut to 1 would cause me not to come back as this is important specie for me. Please keep at 2 and do not have size restrictions.

Non Resident – MIKE KWIGHT wrote on 8/12/08

No annual halibut limit!!! It is very important to me not to have a limit!

Non Resident – DAN CLARK wrote on 8/12/08

No annual halibut limit! Otherwise no trip to Sitka because of the cost.

Non Resident – BROOKE THOMPSON wrote on 8/12/08

Halibut has been the staple of this family fishing trip. Without being able to fish halibut here it may not be worth the trip.

Non Resident – COLLIN THOMPSON wrote on 8/12/08

I disagree with the halibut limit. I thoroughly enjoy fishing + eating halibut; this is one of the few places where these fish are readily available.

Non Resident – JOHN C. THOMPSON wrote on 8/12/08

The limits are cut every year and it is to this point of not being affordable already?

Non Resident – CARRIE CLARK wrote on 8/12/08

No halibut limits. Its outrageous there's no need for the limit. If I can't get the halibut I need in Alaska, Ill go elsewhere.

Non Resident – JOHN CLARK wrote on 8/12/08

Without respectable fish quantities that can be garnered from a 3 day trip. I will not spend more than 1,000.00 to visit Alaska.

Non Resident – JOHN C HERDA wrote on 8/13/08

This is my 3rd Alaskan fishing trip. If the halibut was reduced to 1 per day and an annual limit put in place we would probably consider British Columbia or other area for our annual fishing trip. We bring our non fishing spouses with us on our trips.

Non Resident - BILL MORRISSEY wrote on 8/13/08

No annual halibut limit- I will not return if Sitka goes to a 1 halibut limit. The cost is making the trip to Alaska almost prohibitive now with 2 fish limit- creating a 1 fish halibut it will be prohibitive. I will make my trips fishing to areas that want my money. It appears that Alaska is creating rules that tell me that I am not welcome.

Non Resident - DONALD W. BROOKS wrote on 8/13/08

With more restrictions on halibut, king salmon and ling cod I don't think I would pay this amount of money to only fish for Coho salmon. Even though we enjoyed our selves we both prefer white meated fish.

Non Resident - MARY JEAN HERDA wrote on 8/13/08

I am a non fishing guest with my husband and 3 other couples. Halibut is one of our favorite fish. we would seriously consider going else where if halibut is limited any more.

Non Resident - JO MORRISSEY wrote on 8/13/08

Non fishing visitor -enjoy fishing that husband catches. Halibut is preferred fish we came for. One halibut a day would be unfair for the amount of money spent.

Non Resident -MARY PAUL wrote on 8/13/08

I am a non fishing wife -coming with my husband who fished us really enjoy taking home his catch- and eating it! Please - no more limits.

Non Resident - DAVE LARSON wrote on 8/15/08

If the Sitka halibut limit is one per day, I will not be back! I have been coming for seven years. The halibut limit, ling cod limit, and king salmon limit have all been drastically reduced. This vacation is too expensive for one halibut, one ling and no king salmon.

Non Resident - PHYLLIS LARSON wrote on 8/15/08

The halibut restriction is ridiculous but also the ling cod which appears to be in plentiful this year. Please reconsider your restrictions before I consider fishing elsewhere.

Non Resident - ROOSEVELT HAJINS wrote on 8/15/08

No annual halibut limits. If Sitka has a 1 halibut daily bag limit I will not be back because halibut is my preferred fish. A one bag limit for anglers "guided" is discriminatory- I will spend my money where people welcome my fishing dollars.

Non Resident - GEORGE M. BURKET wrote on 8/16/08

The size limits on halibut now required that we quit fishing in order not to jeopardy healthy fish that could not be landed. I am also upset at the surprise king size restriction and ling cod. This requires releasing fish at a rate of 4 to 1 for no apparent reason.

Non Resident - ALLISON YEE wrote on 8/16/08

No annual halibut limits. If Sitka has one halibut daily bag limit - we will not be back + go elsewhere where people appreciate our money. Halibut is what we eat. A one halibut daily limit for guided anglers is discriminatory. We will go elsewhere to fish. We don't come for sunny weather or beaches.

Non Resident - GARY HALL wrote on 8/16/08

No annual halibut limits. No kings over 48 inches + lings slot is not sensitive to sports fisheries- rules seem to be a form of harassment - if based on biology of species please explain - really no one wants extinction of species. It seems there is over.

Non Resident - BRANDON HANSEN wrote on 8/16/08

I would not come to Alaska if the halibut fishing is severely restricted. Charter fishing dollar. Additional support is the airports and general commercial businesses.

Non Resident - ANTHONY HANSEN wrote on 8/16/08

No annual halibut limits. If Sitka has one halibut daily limit, I will not be back. It is too cost prohibitive for less and less fish. Halibut is the preferred fish to eat for us. A one halibut daily bag limit for suited anglers is discriminatory. I will spend my vacation money where fisherman is welcome!

Non Resident - DAVID PARLATO wrote on 8/16/08

If limits are reduced, ill consider changing my annual trips to northern Vancouver island, British Columbia, Canada rather than Alaska.

Non Resident - GEOFFREY STATHOS wrote on 8/16/08

Recap of 2008 Guided Recreational Angler Comments

I can fish anywhere and catch more fish than I can catch out of Sitka. Keep changing the regulations for sport fishing and I will fish somewhere else.

Resident – BEN C. SWAGGALT wrote on 8/16/08

I would definitely not return to Alaska for a lowered bag limit.

Non Resident – CHARLES GROUWS wrote on 8/16/08

No annual halibut limits if Sitka has a one halibut daily bag limit I will not be back I will fish elsewhere a one halibut daily bag limit for guided anglers just is fair.

Non Resident – RYAN GROUWS wrote on 8/16/08

No halibut limits! If the regulations were changed to 1 fish I would not be back. I came to fish, not sightsee.

Non Resident – TOM CONNOR wrote on 8/16/08

I am from San Diego California-with restrictions such as a one halibut daily limit probably will make me consider spending a lot less money for more fish out of San Diego.

Non Resident – ROBERT C. HILLER wrote on 8/16/08

It is blatantly unfair to penalize the individual in favor of the commercial fishing interests. Mexico and Canadian fishing opportunities are definitely investigating if you pursue this endeavor.

Non Resident – BRUCE I. COTTON wrote on 8/17/08

This is the first time I have come to Alaska to fish and I was planning to come once a year and bring my sons. This is an experience trip for us to start with to continue to cut back limits is a great deterrent for us to return!

Non Resident – GLEN MEDCRAFT wrote on 8/16/08

I feel sportsman bring more outside money into Alaska. I only have so much money to spend and will go where the best fishing experience.

Non Resident – JAMERS R BURK JR. wrote on 8/16/08

The dollars return for the few halibut we catch, relative to the commercial take, is large. We spend a lot of money, and we get it where we get the best return.

Non Resident – RONALD KLINGER wrote on 8/16/08

Limiting the bag limit for halibut will make me reconsider fishing in Alaska. The loss of fish resulting in a much higher cost per pound. Since I bring significant expenditures to the coastal community I'm sure the loss will be felt.

Non Resident – BRIAN L. MCCANN wrote on 8/16/08

If Alaska department of fish and game choose to cut annual halibut limits- kings + ling cod- I will choose not to come back, it is just too costly to come here.

Non Resident – VERNON R. NELL wrote on 8/16/08

I fill that they could reconsider the size restriction on ling cod. I released an average of 5 to 1 the 48 inches size restriction on kings is the most the same privilege as community's fishermen.

Non Resident – PATRICIA HALL wrote on 8/16/08

King salmon catch is ridiculous- commercial fishermen can catch. Lings also out of touch!! Inches- the money coming in from us will be greatly reduced.

Non Resident – JAMES BICH wrote on 8/19/08

No annual halibut limits if Sitka has a one halibut daily bag limit. I will not be back! It costs too much for the return.

Non Resident – ROY B. MOORE wrote on 8/19/08

I feel ling cod restrictions to small also due to size king salmon restrictions it cost will be prohibitive to return to fish Alaska again.

Non Resident – MANIJEL LOPEZ wrote on 8/19/08

I really enjoyed my trip to Sitka. I love fun fishing and think the regulations on Halibut are poor for all of us. Thank you much for everything.

Non Resident – VENUS BARB wrote on 8/19/08

I would not come to Alaska if the fish limit was change.

Non Resident - ELDON HEERMANN wrote on 8/19/08

It is too expensive to travel for no king salmon + a few silver Coho salmon. If I can catch only one halibut I will not come to Sitka.

Non Resident - KENNETH HEERMANN wrote on 8/19/08

I don't think it would be enjoyable is all we could catch is one halibut. I would probably go instead to Mexico.

Non Resident - DARYL ROTHFUS wrote on 8/19/08

I believe it is unfair to put such a restriction on the fishing industry in Sitka, Alaska.

Non Resident - GARY ROTHFUS wrote on 8/19/08

If halibut limits are cut back I will probably not come to Alaska fishing.

Non Resident - STANLEY BOOHER wrote on 8/19/08

I come to fish halibut, but the one daily bag limit does not make my expense to Sitka worth it. If the bag limit is lifted I will return annually. A continued one bag limit will make me support Mexico for fishing + vacations in the future.

Non Resident - SANDRA REGINA WALKER wrote on 8/19/08

No limit should be on halibut. If one halibut daily limit continues; I will not return! Halibut is the best food for my family or we get to vacation while fishing and filling our refrig. Without halibut we will vacation and spend our money elsewhere!

Non Resident - ERIC T. HARDESTY wrote on 8/19/08

No annual halibut limits! One halibut per day is ridiculous. I will not return if this becomes the case. I can go to cabo san Lucas just as easily.

Non Resident - MICKEY JOHNSON wrote on 8/20/08

This is my 10th trip to Sitka and if the current restrictions continue this could be my last trip- on several of my trips I've brought parties of 10 to 12, many of whom have returned for the great chance to stock their freezers - as well as experiencing Sitka.

Non Resident - MARK UPHUS wrote on 8/20/08

No halibut limit- cost is too much for less and less fish. Halibut is for sure one of fish we want to eat .probably go elsewhere if limit is cut back- brought my son for the amount of fishing and experience.

Non Resident - RANDALL MOORE wrote on 8/20/08

If commercial fishing keeps taking away from the sportsman/ halibut, king salmon + ling cod. There is no reason to spend the time - vacation + money to come to Alaska.

Non Resident - LESLIE D. RIVERS wrote on 8/20/08

No annual halibut limits! If Sitka has a one halibut daily bag limit, I will not be back! It is too cost prohibitive for less and less fish. Halibut is the preferred fish to eat with my family. A one halibut daily bag limit for guided anglers is discriminatory! It's not economically worth the time or money for such a limited catch of halibut. I will spend my money that has some return to it.

Non Resident - JANICE SEVERN wrote on 8/20/08

Please no annual halibut limits. We can not continue to return to Sitka to fish (after 12 years coming every year) for less and less fish. This is wrong.

Non Resident - J. H. BOOTH wrote on 8/21/08

A one halibut daily bag limit will make me consider spending my fishing vacation money elsewhere. It is quite unrealistic to spend \$4,000 to fish for halibut and take only one per day.

Non Resident - SHELLY KUMMER wrote on 8/21/08

We would want no annual limits for halibut; we love to eat, as well as fish, for an experience for our family.

Non Resident - TODD RIVERS wrote on 8/22/08

I do not support limits on halibut fishing. Far more money is spent in Alaska by anglers catching a few fish

Non Resident - TODD RIVERS wrote on 8/22/08

I do not support a limit on halibut fishing. Far more money is spent in Alaska by anglers catching a few fishes than by commercial fishermen catching thousands. I feel this limit will force me to consider going elsewhere, with my money.

Non Resident – STEVE MACKELVIE wrote on 8/22/08

This is the only sport fishing trip I schedule every year. I come to Sitka in order to catch salmon and halibut –not just salmon. If you further modify the regulations by limiting the halibut catch I will not invest in Alaska any longer and its totally unfair for the state to suppose that guided and unguided fishing should be different every one pays their taxes and their fair share of the costs of doing business. I will encourage you to look at this from a balanced perspective.

Non Resident – OSCAR HOTTMAN wrote on 8/23/08

A one halibut daily limit for anglers is unfair. I will spend my vacation money elsewhere.

Non Resident – MARTIN FISCHLIN wrote on 8/23/08

No annual halibut limits! If Sitka has a daily bag limit, I will not be back! Halibut is my preferred fish. A one halibut daily bag limit is discriminatory! I will spend my vacation money elsewhere.

Non Resident – BRYAN HOTTMAN wrote on 8/23/08

Halibut is the preferred fish and I will not return to Alaska if the limit is reduced to one.

Non Resident – BRANDON HOTTMAN wrote on 8/23/08

Same bag limit per chartered and none chartered. I won't come back otherwise.

Non Resident – DAVE SEVERN wrote on 8/23/08

I want no annual halibut limits what so ever. Each year for 13 consecutive years the charter boat fishing in Alaska has grown worse with fewer and fewer fish and more governments regulations and restrictions we spend too much money in Alaska to be denied less and less fish to take home. Wake up government officials- don't strangle your economy by regulating the sport fishing charter boat industry out of business.

Non Resident – BRAD HOTTMAN wrote on 8/23/08

If Sitka has a one halibut daily bag limit I will not be back it cost to much to get less fish.

Non Resident – BRENT HOTTMAN wrote on 8/23/08

Same bag limit for chartered and no chartered I wont come back otherwise.

Non Resident – JOHN B. BURR wrote on 8/23/08

No annual halibut limit. If Sitka has a one halibut daily limit, I most probably will not return- our entire family enjoys the halibut very much-a one halibut daily limit is most ridiculous. I shall go elsewhere for my fishing.

Non Resident – GEORGE OLSZEWSKI wrote on 8/23/08

It will not be worth the money to me to come up here if you limit the halibut. Also the king salmon rule is stupid. I will never buy another king stamp if there is a 48 inches size required limit to 1 king but have a more restrict size req. all angler should be treated the same. I have gone to B.C salmon fishing for years and I will return there if the changes take effect.

Non Resident – JD. WALKER wrote on 8/23/08

No annual halibut limits! If Sitka has a one halibut bag limit, I don't think ill come back, it cost too much for less fish. the main fish for my family is halibut, ill just go some other place.

Non Resident – MARK WALKER wrote on 8/23/08

No annual halibut limit if Sitka has a one halibut bag limit. I will not be back it is to cost prohibitive for less and less fish my family prefers to eat halibut a la day bag limit id discriminatory.

Non Resident – MARC MCDONALD wrote on 8/23/08

No annual halibut limits. I will spend my vacation money where fishermen are welcome for the dollars they bring to coastal communities if Sitka has a one halibut daily bag limit I will not be back.

Non Resident – CHRIS GREENE wrote on 8/23/08

No annual halibut limits! If Sitka has a one halibut daily bag limit I will not be back. It is too cost prohibitive for less and less fish. Halibut is the preferred fish to eat in my family. A one halibut daily bag limit for guided anglers is discriminatory! I will spend my vacation money where fishermen are welcomed for the dollars they bring to coastal community. I did not come for the sunshine.

Non Resident – JAMES RENNER wrote on 8/23/08

No annual halibut limits if Sitka has 1 limit I will not be back, halibut is the preferred fish to eat, we bring money to the community, if you limit I will not be back.

Non Resident - DANIEL MCDONALD wrote on 8/23/08

No annual halibut limits. If that happen in Sitka I will not come back to fish. It is too cost prohibitive for less and less fish. family in New York love to eat halibut. One daily bag limit for guided anglers is discriminatory. I spend my money somewhere for fishing if that happens.

Non Resident - KENNETH HOTTMAN wrote on 8/23/08

No limit. Cost too much for only one fish limit. Will not come to Sitka, limit should be same for all fishermen.

Non Resident - DOUGLAS MACKELVIE wrote on 8/23/2008

I have never heard of commercial fishermen having the ability of being able to count the number of fish they catch - Honestly! You are trusting them and putting my yearly salmon and halibut vacation at sincere jeopardy! We as charter fishing persons should receive and live by rules that don't hurt our 2 or 3 day vacations for which we save for from year to year. This is a public resource - federal and state controls - way to punish the private citizen.

Non Resident - DANNY SOZZI wrote on 8/23/08

I will not return to Sitka if an annual limit is imposed, nor will I return if a 1 fish bag limit is put into effect.

Non Resident - DAN SOZZI wrote on 8/23/08

I would not come back if only allowed 1 halibut. I also would not come back if restrictive size limits are put in place. I already had to release two nice king salmon on this trip due to size limits. If you want to reduce take it from commercial side reduce by catch and the problem goes away.

Non Resident - JOHN HIX wrote on 8/24/08

No annual halibut limit! Are you insane? Commercial fishermen are upset with 90% of the quota while sport fisherman gets 10%? Dollar for dollar the sport fishing industry attracts more revenue than commercial fishing does hand down. If you impose this limit you will badly damage the economy and put people out of work! Commercial fishermen are greedy- they do not make significant contributions to the Sitka economy as a matter of fact many are transient coming from Canada or Washington. Hey why don't you consider lowering the commercial quota for a few years to allow the fishery to rebuild- then the commercial fisherman will have a reason to whine, greed is not an acceptable or sustainable rationale.

Non Resident - JUDY HIX wrote on 8/24/08

No annual halibut limits! If Sitka has a one halibut daily bag limit I will not be back. it is too cost prohibitive for less and less fish. Halibut is the preferred fish to eat in my family. A one halibut daily bag limit for guided anglers is discriminatory!!! I will spend my vacation money where fishermen are welcomed for their dollars they bring to coastal community! I did not come for the sun!

Non Resident - RONNIE EDWARDS wrote on 8/25/08

The bag limit should definitely stay at two halibut. I highly enjoy fishing in Sitka Alaska and by me spending this large amount of money, it would be discouraging for me to come and fish here in Sitka Alaska.

Non Resident - MARINE ROGERS wrote on 8/26/08

I accompanied my husband and enjoy eating the fish caught by him.

Non Resident - RUTH LOCKHART wrote on 8/26/08

As I said above I enjoying eating what my spouse catches- if he isn't happy with the "limits" then I won't be able to come along and sight see and shop.

Non Resident - DOYCE LOCKHART wrote on 8/26/08

Halibut limits should not be limited, if Sitka gets a limit on halibut I'm done coming back I want my money to support charter fishing.

Non Resident - LEE ROGERS wrote on 8/26/08

I prefer no halibut limits. This seems restrictive based on the available data. Very expensive trips for one halibut.

Non Resident - TOM FOWLES wrote on 8/26/08

Please no limit on halibut, this is the main reason I come to Sitka to fish. It is not right to limit (1) halibut to sport fishermen only, and more to other organizations.

Non Resident - WALTER CHURCH wrote on 8/26/08

Alaska and halibut are synonymous one halibut daily bag limit for charter fishermen are not acceptable.

Non Resident – ROBERT CHURCH wrote on 8/26/08

If Sitka has a one halibut limit (daily) I will not be back! A one halibut daily limit is discriminatory against guided anglers. I did not come for the scenery or the sunshine (but do like it here) I came for the fish to enjoy all year long. Tighten up restrictions and I won't be back.

Non Resident – RAYMOND HERING wrote on 8/26/08

This is my third year coming to Sitka Alaska fishing, cut the limit down to one and you will shift my fishing to Canada which is only 1 day drive from home, not a \$700.00 airfare flight to Alaska.

Non Resident – GARY P. SCHWARTZ wrote on 8/26/08

There's no logical justification for a one halibut limit applied only to charter services. The resource according to the international pacific halibut commission is robust. Commercial fishing interests drive the one fish limit.

Non Resident – STEVE TAYLOR wrote on 8/26/08

No annual halibut limits. If the limits continue I won't be able to afford to come and fish anymore.

Non Resident – LAUREN BIVINS wrote on 8/26/08

If limits change for the worse for anglers. I will not return and will go elsewhere on my vacation.

Non Resident – SUSAN NIXON wrote on 8/26/08

This is my first trip to Alaska and was extremely disappointed to hear the limits placed on sports anglers. This state is economy (I am sure) is partially dependent on tourists – and this restriction will effect my decision to come here in the future. I have fished my entire life, dreaming to come to Alaska to fish for halibut. If those restrictions are enforced, I guarantee I will not be back. Given the fast tale by commercial fishermen vs. sport fishermen and the income from commercial that the state gets- versus the income this state receives from tourism... I would think this issue would be void. People who came here, spend money not only with the charter company, restaurants, hotels, etc... the tax revenue is significant. on the conservation side- I think there are better ways to work to conserve the wildlife fish etc of this state as well as natural resources. I will certainly pay attention to this issue before I decide to come back.

Non Resident – BRIAN NIXON wrote on 8/26/08

There should be no halibut limit-if it becomes more restrictions we will not be back to help support Sitka or your beautiful state. We love to eat halibut and enjoy the sport in catching them. There are others places to fish please keep us here.

Non Resident – PAM FRACKENPOHL wrote on 8/26/08

Having a one halibut limit will keep me from coming back.

Non Resident – JOHN FRACKENPOHL wrote on 8/26/08

A one halibut limit is not cost effective for me to return.

Non Resident – MARILYN CLAMPITT wrote on 8/26/08

I am not happy with one limit per day I have had a great time but would consider not returning for one daily limit.

Non Resident – LARRY CLAMPITT wrote on 8/26/08

I love fishing here in Sitka, but one halibut a day is not for me.

Non Resident – CHRIS CHURCH wrote on 8/26/08

The opportunity to catch /keep 2 halibut per day is a significant part of my fishing trips to Alaska. If there is no conservation issue, reduce the catch limits for a charter is an unfair allocation of the resource. It will damage the sport fishing industry.

Non Resident – GREG CHURCH wrote on 8/26/08

No annual halibut limits. If Sitka has a one halibut daily bag limit I will not be back. Halibut is the preferred fish to eat in my family. A one halibut daily bag limit for guided anglers is discriminatory!

Non Resident – SUE MATHESON wrote on 8/26/08

I spent \$115.00 at the fair-weather store- I bought a totem pole.

Non Resident – GREG CHURCH wrote on 8/26/08

We want the halibut limit raised to 3 halibut per person.

Non Resident – DOUGLAS L. PEACHER wrote on 8/26/08

I've coming here to fish in Sitka for seven different times now. It seems hat every time I come up here there are new restrictions on charter boats than there are on any body else. It seen very discriminatory that these people are targeted more than other fishing people. I like coming to Sitka to fish. I can catch these big fish anywhere in Alaska but I like coming here. If you keep changing the limits on the fish I will have no other choose but to go some where else to spend my money.

Non Resident – NORMAN PEACHER wrote on 8/26/08

Fishing regulations should be applies to everyone equally resident and visitor in fact the sport fishermen brings with him additional money that helps the residential community.

Non Resident -- MARK V. BENNETT wrote on 8.26.08

This trip is very important to me as it is my only chance to catch halibut. The amount of fish I am allowed to take home is decreasing at every turn. A person who buys a license should be allowed to catch the limit. Not discriminatory by resident private + charter.

Non Resident – MARIE M. BENNETT wrote on 8/26/08

This is the only time I get to fish for halibut. I felt it is discriminatory to allow the private sector special privileges. The halibut population is healthy. The charter fishermen person is not wasting the fish. The commercial fishermen person is + like coming here. Once again that is the only time I get to fish for halibut.

Non Resident – PATRICIA PEACHER wrote on 8/27/08

I came with my family to catch halibut. I got 1 small and no large ones. I would like to be bale to fish where I am allowed to keep them. No annual halibut limit. We can fish elsewhere.

Non Resident – TOM PEACHER wrote on 8/27/08

I believe is totally unfair and non American (equal rights for all) to put restrictions on sports fishermen and to allow commercial fishermen to have a big-catch and still get 9090 of the annual harvest.

Non Resident – BRIDGER STRATFORD wrote on 8/27/08

If halibut restrictions are cut to one- we will not come back. This years limit restrictions have already impacted future plans from thousands of consistant annual non resident anglers.

Non Resident – TRAVIS STRATFORD wrote on 8/27/08

This trip is extremely important for me and my family. We justify the price given the fish we catch just the fish, we are able to bring fish to our family. If the halibut limit is just to one fish, I, we not be back. Charter fishermen traveled not to be discriminatory against.

Non Resident – WILL STRATFORD wrote on 8/27/2008

I will not be back – the fiasco over Alaskan wolves is nothing!! The whole idea is blasphemous and discriminatory! In an inflation environment some numb skulls will cut all opportunity. This is nuts! If sports fishermen don't come here the town will implode. This is a federal infringement of the American with Disabilities Act, if enforced. The long liners are psychopaths and will kill forever. If you do this we will boycott everything Alaskan.

Non Resident JOHN FORMANEN wrote on 8/28/08

Being able to take halibut home is very important. If the limit is prefaced I would be less likely to come back.

Non Resident – GENE L. KENT wrote on 8/28/08

I do not support + a one halibut sport limit. It will affect my interest in coming back.

Non Resident – BECKY HANSEN wrote on 8/29/08

No annual halibut limit.

Non Resident – MICHAEL JANSEN wrote on 8/29/08

Please do not reduce the halibut limit. If the limit is reduced, the cost to come to Alaska because prohibitive. My family, who often accompany me, prefers halibut. Alaska is a beautiful state, but we love to fish and will go where we are welcome.

Non Resident – JOE HANSEN wrote on 8/29/08

I've been fishing in Sitka for many years. The restrictions on catch are making this trip prohibitory expensive. Air fare has increased and bag limits have cut the fish that can be taken back with me has made me think twice about returning!!

Non Resident -- TOM MCGRATH wrote on 8/29/08

In the future I will spend my money where fishermen are welcomed for the dollars they bring to coastal Alaska.

Non Resident – GEORGE D. HANSEN wrote on 8/29/08

One halibut a day is ridiculous and unfair. It's expensive to fish in Alaska if why 1 halibut is allowed. I will choose to spend fish dollars in Canada or Mexico.

Non Resident – REBECCA M. BERG wrote on 8/29/08

Today I caught a 70 lbs halibut – if I can't do this in the future and also have my friends and family experience the thrill of this I don't want to come back- that's not fair!!!

Non Resident – WILL BERG wrote on 8/29/08

The one halibut daily limit is unfair, it unnecessary penalizes me and all fishing partners. it is cost prohibitive and negatively impacts my Alaska experience. I far prefer halibut over other fish. We daily are bag limit is discriminatory. I will spend my fishing vacation elsewhere like Canada.

Non Resident – LISA BROWN wrote on 8/29/08

No halibut limit- keep it fair for guided anglers- as a former Alaska resident –it is important to be able to share the beauty of Alaska to those who want to come and enjoy – being able to return to fish in Alaska is not just for commercial fisheries.

Non Resident – ROBERT BROWN wrote on 8/29/08

The charter industry is my only means of catching halibut. It costs me a lot of money to come on this trip and most of this goes directly to the economy of Sitka. I don't see the need for a one fish bag limit if the halibut – population is healthy especially if commercial fishing is responsible for 90 percent of the harvest.. I will not be back if there is a one fish bag limit. I will take my vacation money somewhere else.

Non Resident – MICAH JENSEN wrote on 8/29/08

No annual halibut limit!

Non Resident – DAVID STEPHENS wrote on 8/31/08

How could you even consider a more restrictive regulation for charters over others? This shows at special interest regulations please don't make me stay home!!!

Resident – RICHARD LEE wrote on 8/31/08

No annual halibut limits you all ready made it impossible to get king salmon.

Non Resident – DAVID BASS wrote on 8/31/08

I for one couldn't justify my expenses if a one per day limit was enforced.

Non Resident – DAVID ORTIZ wrote on 8/31/08

I was very dissatisfied with this years bag limit as it was. Why would I spend that kind of money and be limited more.

Non Resident – PAT ORTIZ wrote on 8/31/08

A one halibut limit will certainly cause my vacations to Sitka. As it is now ill be able to fish Mexico and/or California for almost any amount of fish.

Non Resident – JANEL STEPHENS wrote on 8/31/08

No annual halibut limits please.

Non Resident – DANTE GAGLIARDI wrote on 9/1/08

The limits on halibut will be a decision factor, to come back or no to we did not conte here for sunshine, we came here to fish!!

Non Resident – JOHN C. AMYX wrote on 9/1/08

I will not be back if there are any further halibut limits! I can take my money to Canada or Mexico. A one halibut daily limited for chartered fishermen is ridiculous and discriminatory. Do not restrict to 1 halibut per day.

Non Resident – ERIC BENGTON wrote on 9/1/08

The great halibut fishing is a main reason I come here. If there is a 1 fish limit; I will have to fish outside Alaska. Where my charter fishing business would be welcomed and appreciated.

Non Resident – GARY K. BENGTON wrote on 9/1/08

Recap of 2008 Guided Recreational Angler Comments

Because I have some physical limitations I really depend on the charter industry to make this possible to fish in Alaska. If the limits change I will not come back to Alaska to fish.

Non Resident – DAN HUBER wrote on 9/1/08

Why would the state of Alaska discriminate against the minority participants in the most wonderful fishing in the world? If I can not enjoy the benefit of my catch I will go elsewhere, probably Mexico. Hawaii has already blow it, do not do it Alaska!

Non Resident – TODD BENGTSON wrote on 9/1/08

This is a disturbing trend. Local economies are being sacrificed. If discriminatory practices continue I will not support Alaska's economy with my hard earned dollars. Halibut is the primary reason for visiting Alaska. My wife's first question is "how much halibut today?" if I am not appreciated in Alaska I will go elsewhere.

Non Resident – STEPHEN DONOVAN wrote on 9/1/08

I won't come back.

Non Resident – FRED BURNETT wrote on 9/1/08

If Sitka has a one halibut daily bag limit I will not be back. I spend a lot of money for Alaska fishing and ill go elsewhere.

Non Resident – STEPHEN DONOVAN wrote on 9/1/08

It's not fair. People traveling to Alaska spend a lot of money in the out filter charter business; spend money of eating out, money on gifts, hotels and everything else. Your going to loose when people don't come back for I fish a day.

Non Resident – STEVE LAMBDIN wrote on 9/1/08

One of the main reason I come is for halibut. The total cost of the trip is expensive and to limit the amount of halibut that can be caught would cause me to re think future trips.

Non Resident – David Hill wrote on 9/1/2008

Just having one halibut per day is silly. Length on ling cod is the craziest. This should be large size, larger sizes. Keep 5-6 small fish each day. That is size discriminatory! Please, Please Change Law!!!! I love the rain.

Non Resident – TOMMY GRUBBS wrote on 9/3/08

I strictly come up for the halibut. I will not return if the bags limit changes.

Non Resident – ANTHONY L. GRUBBS wrote on 9/3/08

No annual halibut limits- a one halibut daily bag limit for guided anglers is discriminatory.

Non Resident – DENNIS GRUBBS wrote on 9/3/08

No annual halibut limits! If Sitka has a one halibut daily bag limit I will not be back.

Non Resident – FRANK HEARD JR. wrote on 9/3/08

I feel a one halibut limit will truly hurt the charter operators because very few people will go willing to use the service for our halibut.

Non Resident – WILLIAM GRUBBS wrote on 9/3/08

I think that all anglers should be treated the same. I definitely won't be back. I come for the halibut. One halibut limit isn't much fish.

Non Resident – GEORGE JONES wrote on 9/3/08

Ill not return to fish Alaska with a one halibut bag limit.

Non Resident – JAMES L. KIPLE wrote on 9/3/08

This is an expensive vacation where I spend a lot of money in this small community. I would not ever think of coming back of there was a one halibut daily limit.

Non Resident – JEFFREY S. WELP wrote on 9/3/08

No annual halibut limits! If Sitka has a one halibut daily bag limit I will not be back. It is too cost probative for less and less fish. Halibut is the preferred fish to eat in our family a one halibut daily bag limit for guided anglers is discriminatory! I will spend my vacation money where fishermen are welcomed for dollars they bring to coastal communities. I did not come for the sunshine.

Non Resident – RUSSEL NORRIS wrote on 9/3/08

A one halibut daily bag limit is discriminatory. Charter fishing is a major attraction has the primary reason for coming to south east Alaska.

Non Resident - TOBBY JONES wrote on 9/3/08

I'll likely not return to spend my vacation fund on fishing Alaska with a one halibut limit.

Non Resident - TRAVIS JADWIN wrote on 9/4/08

I feel that there should not be a halibut limit, maybe a size limit on small one. It cost a lot of money to fish for halibut. And it is my favorite fish to eat.

Non Resident - MATT DANIELLS wrote on 9/4/08

Putting restrictions on an industry that makes as much money, yet has attraction of the impact on the resource, seems like a no brainer to me, why would they even consider it? Sounds like organized crime in action.

Non Resident - JESSE J. BASS JR. wrote on 9/4/08

I have been coming to Alaska for 20 years and will not come back if further restrictions are implemented for our fisherman class hope you reconsider this imposition!

Non Resident - ALBERT A. KERCHEVAL wrote on 9/4/08

It is too cost prohibitive to come here and take back less and less fish. There should be no annual halibut limit, if there is in Sitka I won't be back. I will spend my vacation money some other way. We did not come for the sunshine not did I like the ling cod require, it kill them one way.

Non Resident - WAYLON JADWIN wrote on 9/4/08

I feel that we should be able to keep a weight of at least 300 pounds of halibut in a year for the limit or maybe 5 per person a day but definitely more than two a day the ocean is really big with billions of fish in it so let people catch a little more it is expensive to go up here and fish get your money worth.

Non Resident - Jason Jadwin wrote on 9/4/2008

We prefer to go out on a charter boat because it is the safest way to catch halibut in Alaska. All sport fishermen should have same daily bag limit of two halibut per day. Halibut resource belongs to all the citizens of the United States. A one daily bag it because I go on a charter boat is wrong. Please Do Not do that! PLEASE!!!

Non Resident - CLIVE WILLIAMS wrote on 9/4/08

It is not fair to have double standards fishing the same matters.

Non Resident - STACEY SCOTT wrote on 9/4/08

The cost for coming to Alaska for fishing is not cheap a one halibut day limit would stop me from coming back.

Non Resident - LEE BLODGETE JR. wrote on 9/4/08

It makes no sense to limit charters without similar restrictions on other anglers- sport or commercial. This appears to be based on discrimination and not conservation! We always come to Sitka to fish, but perhaps I should spend my money elsewhere!

Non Resident - LEO BLODGETT SR. wrote on 9/4/08

It seems very unfair to discriminate against charter boat fishing I will probably be back to fish at Sitka but the same limit for an no different limit for some .

Non Resident - JAMES KUSKA wrote on 9/6/2008

A one halibut daily bad limit for guided anglers is discriminatory and it is unfair. I will find it hard to justify coming to Alaska to fish when the bag limits are decreasing. I will choose to spend my recreation dollars elsewhere.

Non Resident - GERALD STUBBS wrote on 9/6/2008

If Sitka has a one halibut daily bag limit I wont be coming back next season.

Non Resident - JONNY LANDRO wrote on 9/6/2008

It doesn't make sense to spend more and more money and get to keep less and less halibut. This is America and I will not be discriminated against because I choose to use a guided service. I will not spend and more money in your state if the one bag limit is rced.

non Resident - ERIK LANDRO wrote on 9/6/2008

No annual halibut limit. If Sitka has a one halibut daily limit I won't be back. It cost too much for such a small amount of fish. Halibut is my favorite fish. A one halibut per daily limit for guided fishers is discrimination. I will spend my vacation money elsewhere. I didn't come for the sunshine.

In Resident - BRYAN BENTROTT wrote on 9/6/2008

Until there are stricter restrictions on commercial fishing, no additional restrictions should be placed on sport fisherman. Halibut is a huge reason to go on this trip and I would probably not make the trip if there was a one halibut limit unless the reason was for conservation and started with greater limits for commercial fisherman.

Non Resident - BRYAN BENTROTT wrote on 9/6/2008

Commercial fishing depletes halibut stocks much quicker than individual sport fisherman. There should be no further restrictions on sport fisherman until commercial halibut fishing is limited and stocks evaluated.

Non Resident - BRIAN PERKINS wrote on 9/6/2008

I love to catch halibut. That's why I come here. If I can only catch one a day I don't think I will be back.

Non Resident - LOREN PERKINS wrote on 9/6/2008

I have had many enjoyable Alaska fish and hunt adventures over the past 50 years.

Non Resident - DAVID BENTROTT wrote on 9/6/2008

There are mainly two fish I go fishing to catch, most are halibut and salmon. Being able to catch two halibut per angler is reasonable, although lowering the limit to one would make it tough to want to fish for halibut. Making a two fish slot take would help. I would like to keep the big ones, 20-90 lbs and throw back the rest.

Non Resident - KEN WISE wrote on 9/6/2008

Two halibut per day is a reasonable limit and halibut should be measured to 32" as a keeper (minimum), and to a 60" maximum. Leave the small ones and throw the big ones back to mate. No further limits other than these.

Non Resident - CODY NORDHEIM wrote on 9/6/2008

I consider my money well spent for two halibut with no size restrictions per day. For any restrictions less than this; it makes me consider the wasted time and money on my part and the charters business.

Non Resident - CLAUDE JACKMAN wrote on 9/9/2008

I come to Sitka only to fish. If my fishing limit are continually reduced, I will quit coming. Another sore point is the very narrow window for a ling cod and the few yellow eye allowed as each one brought to the surface dies anyway.

Non Resident - RICHARD KINGSMILL wrote on 9/10/2008

You (Alaska) are competing for my fishing dollar with Mexico. I will not come here and spend my vacation dollar if I feel I'm being cheated by arbitrary laws that restrict what I can catch with no logic or science to support laws. Greed will cost Alaska.

Non Resident - ALDINE COFFMAN wrote on 9/10/2008

10% of all Halibut should be allocated to the charter businesses!! That 10% represent 30-50% of the domestic economic benefit of the halibut industry.

Non Resident - BEN WILLIAMS wrote on 9/10/2008

Limiting chartered and not commercial fishing seems absolutely discriminating! If limits on halibut are instituted I will probably not be back. Please do not limit.

Non Resident - NATHAN WILLIAMS wrote on 9/10/2008

No annual halibut limit. It's very expensive to come and fish. Limiting us even more makes me reconsider the expense. I love Sitka, but may not incur the cost if this is changed.

Non Resident - GREGORY DEWERD wrote on 9/10/2008

No annual halibut limit. If Sitka has one halibut daily limit I will not be back. It is too cost prohibitive for less and less fish. A one halibut daily limit is discriminatory. I will go elsewhere.

Non Resident - RALPH CHAPMAN wrote on 9/10/2008

No annual halibut limits! Two daily bag limits is O.K. one is not! If this is changed I will not be back!!! Further it is discriminatory. You will sacrifice tourist fishing to enhance the commercial industry. I will spend my money where sport fishermen are welcomed for the money they bring into the coastal communities.

Resident - CREIGHTON DEPEW wrote on 9/11/2008

So! Why would anybody of sane mind even consider private boat owners/passengers allow different halibut limits then charter boat clients? I sense corruption. Please don't change the rules.

Non Resident - JAMES BURT wrote on 9/11/2008

I don't believe there should be discrimination between private and charter. Same fishermen, same fish. There also should not be an annual limit as I may desire to come to Sitka more then once per year. i.e. Once with family, once with friends. If charter fish are limited, more fish will go to the commercial fisherman. Is this the real objective?

Non Resident - JACK ROBINSON wrote on 9/11/2008

This is a resource re-allocation issue that favors commercial fisherman unfairly. Tourism, sport fishing is a huge economic resource to all of Alaska. Why would you implement a policy that would reduce this revenue source?