


MEMORANDUM

TO: Council, AP and SSC Members

FROM: Clarence G. Pautzke   
Executive Director

DATE: November 29, 1989

SUBJECT: Halibut Management

**ACTION REQUIRED**

Approve allocative proposal for management of halibut in Regulatory Area 4C (Pribilof Islands).

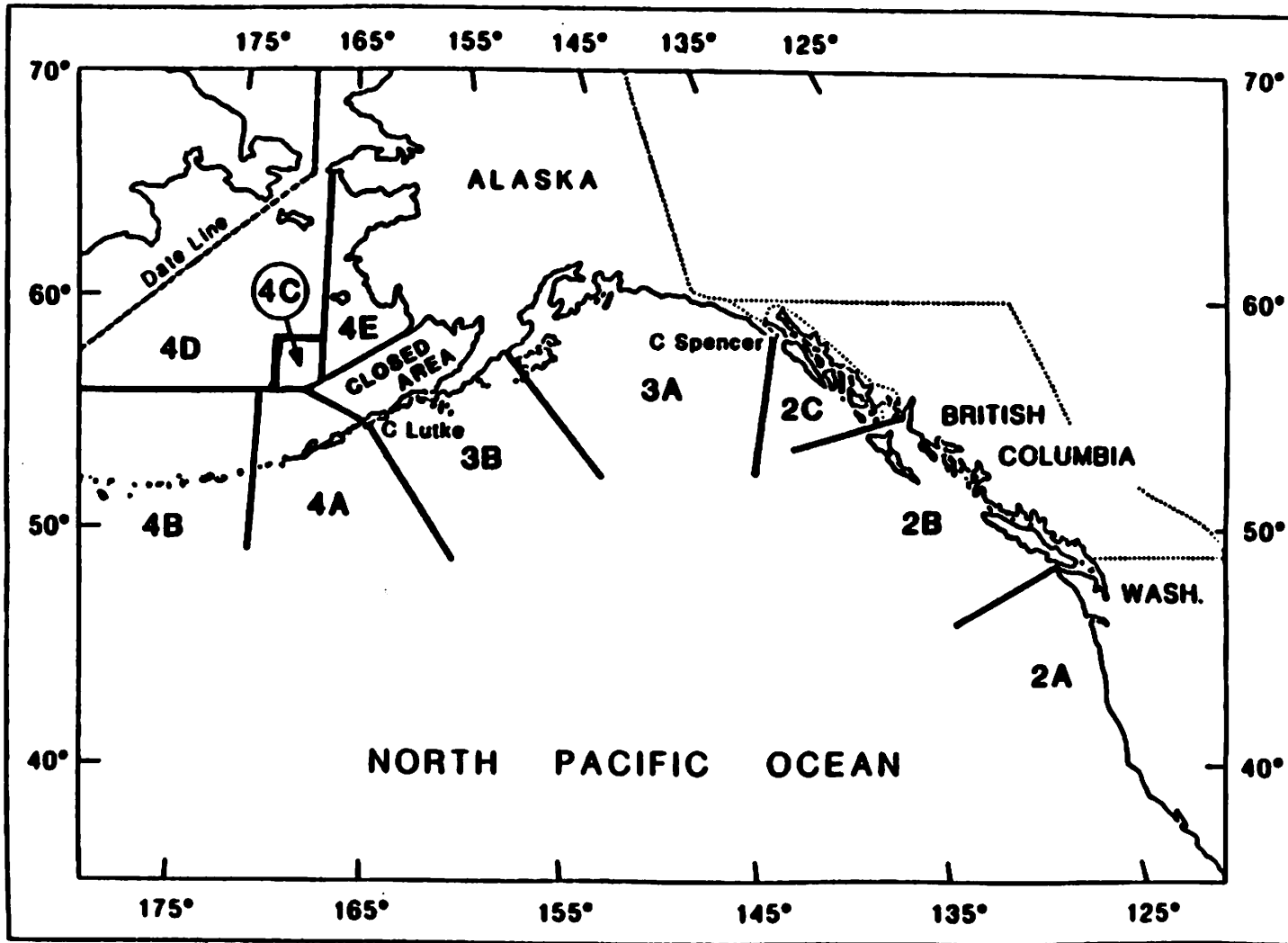
**BACKGROUND**

At the September meeting the Council reviewed 17 proposals for regulatory change in the halibut fishery off Alaska. After hearing recommendations from the Halibut Management Team and Halibut Regulatory Amendment Advisory Group, the Council forwarded one management proposal to the Halibut Management Team for analysis. This proposal, from the Central Bering Sea Fishermen's Association (CBSFA), concerns Regulatory Area 4C which surrounds the Pribilof Islands. The CBSFA has requested Council approval of a different allocative scheme for Area 4C. A chartlet showing halibut management areas is under item C-3(a).

Currently the fishery in Area 4C requires hold inspections and vessel clearances for non-local vessels, and imposes a 10,000 lb. trip limit until 50% of the catch is taken, with a 20,000 lb. trip limit thereafter. The CBSFA has requested that the 10,000 lb. trip limits be imposed for the entire season, that the hold inspections and vessel clearance requirements continue, and that the season open on June 25 each year.

The proposed management action has allocative effects and is correctly addressed by the Council. If an alternative other than the status quo is approved by the Council, the alternative will be forwarded to the Secretary of Commerce for review and approval. Item C-3(b) shows the Council's halibut management cycle.

A final Environmental Assessment/Regulatory Impact Review (EA/RIR) was sent to you earlier and discusses the anticipated effects of the proposed management actions. An executive summary is under item C-3(c). Comments on the EA/RIR received from the public are provided in item C-3(d); all support Alternative 2, season-long 10,000 lb. trip limits.



Regulatory areas for the Pacific halibut fishery.

COUNCIL'S CURRENT HALIBUT REGULATION SCHEDULE

August 15 Publically announce cycle for halibut regulations and release a call for regulatory proposals (except for proposals specifically dealing with harvest quotas).

September 15 Deadline for receiving regulatory proposals. Initial review by management team (MT).

September 17 Halibut RAAG (regulatory amendment advisory group, similar to PAAG for groundfish plan amendment review) reviews proposals and team recommendations:

late September At the September Council meeting the Council reviews recommendations of the Halibut RAAG and team, and drops or approves regulatory proposals, and possibly adds proposals of their own.

mid-October MT submits a Notice of Availability (NOA). NOA is published in the Federal Register for 30-45 days of public comment.

early December At the December Council meeting the Council reviews public comments, further MT analyses, comments from IPHC, and takes final action on regulatory proposals. IPHC is notified of Council action and asked to consider any changes in their regulations that might be needed to implement Council measures.

late December Send final package to Secretary of Commerce for action. SOC reviews, pproves/disapproves/amends, and publishes a Notice of Proposed Rule Making (NPRM) in 30 days.

late January NPRM 30-day comment period begins. IPHC meets late January can comment to SOC on Council actions. Bio/conservation regs they develop will be implemented at approximately the same time as Council regs -- mid-April.

late February SOC prepares a Final Rule Making package (FRM).

March 10 FRM is published in the Federal Register.

April 10 Regulations become effective; published in IPHC regulatory package.

## 1.0 INTRODUCTION

The North Pacific Fishery Management Council has established an annual cycle for considering public proposals to amend regulations for the halibut fishery off Alaska. Pursuant to the Northern Pacific Halibut Act of 1982 and responding to a request from the National Marine Fisheries Service, the Council considers only those regulatory changes whose purpose is primarily allocative or socioeconomic in nature. Regulatory changes which primarily address questions of biology or conservation are deferred to the International Pacific Halibut Commission (IPHC).

### 1.1 Proposed Regulatory Amendment and Alternatives

The Council solicited amendment proposals in August 1989, and by September 15 had received 17 which were then reviewed and evaluated by the Council's Halibut Management Team (MT) and Halibut Regulatory Amendment Advisory Group (RAAG). At its September meeting, the Council reviewed the recommendations of the Halibut MT and RAAG, and decided to consider one regulatory amendment proposed by the Central Bering Sea Fishermen's Association (CBSFA). This proposal concerns Regulatory Area 4C, which surrounds the Pribilof Islands. Regulations governing the Area 4C halibut fishery have been the subject of Council deliberation in each of the last three years. In large part, these regulations determine the relative split of the harvest between local and nonlocal fishermen, where a local fishermen is defined as one who lands his/her entire annual halibut catch within Area 4C. Because of the allocative purpose of this proposal, it was determined that the Council had at least partial responsibility for its consideration.

In addition to the above proposal, this analysis also examines alternative means of accomplishing the same goals. In all cases, the analysis evaluates the alternatives relative to the status quo regulations. Assuming that the IPHC is responsible for determining boundaries of regulatory areas, total catch limits, specific dates of fishing periods, and other conservation-based management measures, this analysis focuses on trip limits, vessel clearance and hold inspection requirements, direct allocation, and referral to the IPHC as management measures. Specifically, the following alternatives are considered:

- 1) Alternative 1: Status quo. This alternative retains the current vessel clearance and hold inspection requirements for nonlocal vessels, imposes a 10,000 lb. trip limit until 50% of the catch limit is taken, and imposes a 20,000 lb. trip limit thereafter.
- 2) Alternative 2: Season-long 10,000 lb. trip limit. This alternative, proposed by the CBSFA, retains the current

vessel clearance and hold inspection requirements for nonlocal vessels, imposes a 10,000 lb. trip limit for the entire season, and delays the season opening until June 25. In proposing this alternative, the CBSFA provided three objectives: A) to maintain a fair opportunity for small vessel participation in the Area 4C fishery, B) to provide a consistent, fresh, locally caught product for market, and C) to expand local fishing opportunity, in anticipation of increased harbor capacity in the future.

- 3) Alternative 3: Direct allocation. This alternative removes the current vessel clearance and hold inspection requirements for nonlocal vessels, imposes a 20,000 lb. trip limit for the entire season, and prohibits nonlocal vessels from participating in the fishery until 80% of the catch limit is taken.
- 4) Alternative 4: Provide direction to IPHC. This alternative retains the status quo regulations, and requests the IPHC to adopt whatever additional trip limit and season opening measures are necessary to result in local vessels taking 80% of the catch limit.

## 1.2 Purpose of the Document

This environmental assessment (EA) and regulatory impact review (RIR) provides background information and assessments necessary for the Secretary of Commerce to determine that proposed regulatory actions are consistent with the Northern Pacific Halibut Act, the Magnuson Fishery Conservation and Management Act, and other applicable federal law, such as the National Environmental Policy Act (NEPA), the Regulatory Flexibility Act (RFA), and Executive Order 12291 (E.O. 12291).

The specific purpose of an EA is to analyze the potential impacts of proposed actions, and reasonable alternatives, on the quality of the human environment. If the action is determined not to be significant, then the EA will result in a finding of no significant impact (FONSI); this EA would then be the final environmental document required by NEPA. If, however, a FONSI cannot be made, then a more detailed environmental impact statement (EIS) must be prepared.

The purpose of an RIR is to analyze several socioeconomic aspects of proposed regulatory actions to assure that such actions enhance the public welfare in an efficient and cost-effective manner. The RIR also serves as a basis for determining whether the proposed regulations are "major" under E.O. 12291 and whether they will have a significant economic impact on a substantial number of small entities under the RFA.

### 1.3 Structure of the Document

This document combines the EA/RIR for the proposed amendment in chapter 2 (Analysis of Proposed Regulatory Amendment). Within this chapter the environmental impacts of all four alternatives are discussed briefly, followed by a description of the fishery under the status quo. The other three alternatives are then discussed in terms of economic impacts. The Appendix describes a model that is used in chapter 2.

## 2.0 ANALYSIS OF PROPOSED REGULATORY AMENDMENT

Regulatory Area 4C consists of a small portion of the Bering Sea surrounding the Pribilof Islands. Specifically, Area 4C includes all waters in the Bering Sea north of latitude 56°20'00" N. and north of the closed area which are east of longitude 171°00'00" W., south of latitude 58°00'00" N., and west of longitude 168°00'00" W.

The environmental impacts of all the alternatives are considered insignificant. Under all alternatives, total catch limits will continue to be established and monitored by the IPHC according to sound conservation principles. For example, the current regulations (in effect now for two years) have not impaired the IPHC's ability to control the total harvest in Area 4C effectively. Although the catch limit was exceeded by 278,000 lbs. (46.3%) in 1987 (before the current regulations were adopted), the 1988 and 1989 catches (taken under the current regulations) were kept within 5,000 lbs. (0.7%) and 29,000 lbs. (4.8%) of their respective limits (Table 1). Alternatives 2-4 are at least as restrictive as the status quo, and thus would be unlikely to diminish the IPHC's ability to control the overall harvest effectively.

Table 1. Recent history of the Area 4C halibut fishery.

Year:	1984	1985	1986	1987	1988	1989
Catch (1000s of lbs.)						
Local Fishermen:	250	270	121	263	480	286
Nonlocal Fishermen:	330	350	565	615	215	285
	—	—	—	—	—	—
Total:	580	620	686	878	695	571
Catch (percent)						
Local Fishermen:	43.1	43.5	17.6	30.0	69.1	50.1
Nonlocal Fishermen:	56.9	36.5	82.4	70.0	30.9	49.9
Catch Limit (1000s of lbs.):	600	600	600	600	700	600
Season Length (day openings):	33	24	18	6	17	13

### 2.1 Alternative 1 - Status Quo

Current regulations in Area 4C call for a 10,000 lb. trip limit to be applied to the first 50% of the catch limit, and a 20,000 lb. trip limit for the remainder. The status quo regulations also require nonlocal fishermen to obtain a vessel clearance and hold inspection in Dutch Harbor or Akutan prior to each opening.

These regulations result from action taken by the Council in 1987.

Economic impacts of the current regulations consist largely of redistributing the catch in favor of local fishermen. For example, local fishermen took only 16% of the Area 4C catch in 1986 and 30% in 1987, whereas they took 69% in 1988 under the current regulatory regime (Table 1). However, it is not clear that the entire amount of this redistribution can be attributed to current regulations. For example, the regulations governing this fishery remained essentially unchanged between 1988 and 1989, yet the proportion of the catch harvested by local fishermen decreased from 69.1% in 1988 to 50.1% in 1989. In addition to possible distributional effects, other economic impacts of the current regulations include an increase in operating costs imposed on nonlocal fishermen by the vessel clearance requirement, and a slight increase in availability of fresh halibut (due to an increase in season length).

## 2.2 Alternative 2 - Season-Long 10,000 Lb. Trip Limit

This alternative would impose a 10,000 lb. trip limit for the entire season, retain the current vessel clearance and hold inspection requirements, and delay the season opening until June 25.

By extending the current 10,000 lb. trip limit for the entire season, the main economic impact of this alternative should be to redistribute the catch further in favor of local fishermen. The Appendix describes two versions of an economic model of the Area 4C halibut fishery used to predict possible consequences of changing the duration of the 10,000 lb. trip limit. Table 2 compares the output of this model under Alternatives 1 and 2. The results from the continuous version indicate that Alternative 2 would be expected to increase local catch by 260,304 lbs. (77%), decrease nonlocal catch by 260,304 lbs. (99%), and decrease total profit (to all vessels) by \$59,156 (10%). The results from the discrete version of the model indicate that Alternative 2 would be expected to increase the number of openings by 8 days (114%), increase local catch by 313,774 lbs. (114%), decrease nonlocal catch by 214,720 lbs. (100%), increase total catch by 99,054 lbs. (20%), and increase total profit by \$72,346 (17%). Taken together, the results from the two versions of the model imply that local fishermen would gain under this alternative, while nonlocal fishermen would suffer losses. The net benefit could be either positive or negative. One benefit not computed in the model is that there might be a gain to consumers from a slight increase in availability of fresh halibut (due to the longer season) under Alternative 2.



Table 2. Comparison of Alternatives 1 and 2 (1990 projection).

Continuous Version:

	<u>Alter- native</u>	<u>Local Catch</u>	<u>Nonlocal Catch</u>	<u>Total Profit</u>
	1	336885	263115	569642
	2	597189	2811	510486

Discrete Version:

<u>Alter- native</u>	<u>Open- ings</u>	<u>Local Catch</u>	<u>Nonlocal Catch</u>	<u>Total Catch</u>	<u>Total Profit</u>
1	7	274553	214720	489273	427686
2	15	588327	0	588327	500032

- Notes: 1) The continuous version allows fractional numbers of vessels and openings, and constrains total catch to equal 600,000 lbs; the discrete version requires that vessels and openings be measured in whole numbers, and allows total catch to be less than 600,000 lbs.
- 2) Openings are measured in days, catch in lbs., and profit in dollars (total profit refers to profit accruing to all vessels).

A few qualifications should be given for interpreting the results shown in Table 2. First, total profit is defined here as the difference between revenues and non-labor variable costs for all vessels combined. Other definitions of profit might produce different results. For example, this particular definition implies an equal weighting of profits in the two fleet components. Equal weighting may be inappropriate, given that local fishermen are far more dependent on the Area 4C halibut fishery than are the nonlocal fishermen. In other words, a decision regarding this proposal might appropriately give greater weight to impacts on local fishermen. Such a weighting scheme might bear in mind that in 1989, 100% of the halibut catch taken by local fishermen came from within Area 4C, whereas only 0.4% of the total halibut catch taken by nonlocal fishermen came from within Area 4C.

Second, while the model projects nonlocal fishing effort simply as a function of time and the proportion of the catch taken under the 10,000 lb. trip limit, other factors undoubtedly come into play (e.g., the difference between ex-vessel halibut price and ex-vessel prices of other longline-caught species such as

sablefish).

Finally, these results should not be construed as implying that no other management scheme could improve on the alternatives examined. For example, a regulatory proposal designed to remove the trip limit and vessel clearance requirements might generate a higher total profit level than any of the alternatives examined in this document.

### 2.3 Alternative 3: Direct Allocation.

This alternative removes the current vessel clearance and hold inspection requirements for nonlocal vessels, imposes a 20,000 lb. trip limit for the entire season, and prohibits nonlocal vessels from participating in the fishery until 80% of the catch limit is taken.

Lacking guidance from the Council on an appropriate harvest split between local and nonlocal fishermen, the 80% figure was derived from public testimony given at the September 1989 Council meeting. At that meeting, a spokesman for the CBSFA indicated that by taking 480,000 lbs. in 1988, local fishermen "got very close to making a living." Assuming that the IPHC keeps the catch limit for Area 4C at 600,000 lbs., 80% might be taken as an estimate of the "break-even" share for the local fishermen.

This alternative should have results similar to those obtained under Alternative 2 (Table 2), since nonlocal fishermen may not consider it worth their while to participate in only the tail end of the Area 4C season. Removal of the vessel clearance and hold inspection requirements may not serve as sufficient incentive for nonlocal vessels to participate, since there would probably be only a small number of openings during the part of the season open to them.

### 2.4 Alternative 4: Provide Direction to IPHC

This alternative retains the status quo regulations, and requests the IPHC to adopt whatever additional trip limit and season opening measures are necessary to result in local vessels taking 80% of the catch limit.

By asking the IPHC to effect an 80% local share of the catch limit, Alternative 4 is designed to accomplish the same objective as Alternative 3, and would therefore be expected to have similar results. The principal advantage of this alternative is that it allows the IPHC to choose the regulatory mechanism that best fits within its overall management program. The principal disadvantage is that any regulatory mechanism other than direct allocation carries with it some possibility of failure.

### 3.0 EFFECTS ON ENDANGERED SPECIES AND ON THE ALASKA COASTAL ZONE

None of the alternatives described here would constitute an action that might affect endangered or threatened species or their habitats within the meaning of regulations implementing Section 7 of the Endangered Species Act of 1973. For this reason, consultation procedures, pursuant to Section 7, are not necessary.

None of the alternatives described here would be a federal action directly affecting the coastal zone of Alaska within the meaning of Section 307 (c)(1) of the Coastal Zone Management Act of 1972 and its implementing regulations. Each of these alternatives comply to the maximum extent practicable with the Alaska Coastal Management Program.

### 4.0 FINDINGS OF NO SIGNIFICANT IMPACT

For the reasons discussed above, neither implementation of the status quo nor any of the alternatives to that action would significantly affect the quality of the human environment, and the preparation of an environmental impact statement on the final action is not required by Section 102 (2)(C) of the National Environmental Policy Act or its implementing regulations.

\_\_\_\_\_  
Asst. Administrator for Fisheries, NOAA

\_\_\_\_\_  
Date

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Tel: (907) 859-2263  
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Anchorage Office:

4000 Old Seward Hwy., Suite 301  
Anchorage, Alaska 99503  
Tel: 561-2124  
Fax: (907) 561-4674

29 1989

November 27, 1989

North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

Dear Commissioners:

The Pribilof Islands' joint proposal to retain a 10,000 lb. per trip limit for the entire quota this year is fully supported by the City of St. George.

As a City in the process of trying to convert its economy from traditional means to that of commercial fisheries, St. George faces many difficulties. Small boat fishermen are the backbone of our emerging fishing industry. Their ability to gain access to halibut in our Area is directly related to the harbor schedule. Construction delays in building such safe harbor facilities as are necessary to enable the use of efficient halibut fishing vessels for our fishermen have resulted in actual reduction of their even moderate harvests in the past.


With only 39,000 lbs. of halibut caught by local fishermen in 1989, an all time low, we see no substantial increases in harvests in the short run.

Therefore, under these circumstances the few fish that are caught locally take on incredible importance to the community's livelihood. We support the proposal for 10,000 lb. per trip limit and urge the Commission to recognize the situation in its deliberations by giving its endorsement.

Thank you for the opportunity to provide testimony on this issue.

Sincerely yours,

CITY OF ST. GEORGE



Max Malavansky  
Mayor

Pribilof Island Aleut Community  
of  
St. George Island/Traditional Council

St. George Island, Alaska 99660-7  
November 27, 1989 (907) 859-2242

Mr. Don Collinsworth, Chairman  
North Pacific Fisheries Management Council (NPFMC)  
605 West 4 th Avenue  
Anchorage, Alaska 99501

Dear Mr. Collinsworth,

Re: 4C Halibut Fishery

- President  
Boris H. Mercuriel
- Vice President  
Gilbert F. Kashevarof
- Secretary/Treasurer  
Beverly Kashevarof
- Board Members  
Maxim Malavensky  
John Poljomonof  
Sally Mottel
- Administrator  
Marina B. Malavensky

We represent about 180 Aleut residents of St. George Island. Our economy until 1983 was provided by the U.S. Government as a ward of the U.S. In 1983, we were given a trust fund and a verbal promise by the State of Alaska and the U.S. Government that a harbor would be constructed on St. George Island to facilitate the conversion of our economy to a fisheries based economy.

As we all know, the funds available for infrastructure development from the State of Alaska has decreased substantially from 1983, thus the people of St. George financed the last \$3,000,000 portion of our harbor dredging. We are committed to developing a fishing economy and we understand that the NPFMC considers these issues also.

In 1982, the village corporation built a processing plant on the Island to provide the fishermen an avenue to sell their product. However, with the lack of quota available to our fishermen the plant has never broke even in 7 years. In 1988, about 150,000 pounds of product was delivered. The fresh halibut was shipped to Boston providing fresh Halibut from the sea to the table in 4 to 7 days. The plant has found a niche market in quality processed fresh halibut. The Island has spent over a million dollars in developing this expertise so that we can accept more product and support a local economy.

Upon completion of the harbor in 1990, our fleet will be able to participate more in this fishery. Our fleet is a developing fleet in that we do not have decades of access to the resource and the market. Consequently, we respectfully ask the NPFMC to consider alternative 2. This alternative will continue to support a developing economy by providing a reasonable quota of 10,000 pounds per trip for 100% of the quota.

Very truly yours,  
*Gilbert Kashevarof*  
Gilbert Kashevarof, President

\*\*\*\*\*  
F A X T R A N S M I T T A L M E M O  
\*\*\*\*\*

NO OF PAGES	1
TO: NPFMC	
DEPT:	FAX #: 271-2817
FROM: <i>Gilbert Kashevarof</i>	PHONE: 261-2124
CC: <i>Traditional Council</i>	FAX #: 261-4674

Rec'd - Traditional Council memo 7/87

ST PAUL ISLAND

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# TANADGUSIX CORPORATION

*St. Paul Island, Alaska*  
*Seeking A Better Tomorrow*  
November 27, 1989

ANCHORAGE

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ANCHORAGE, AK 99503

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COPY FOR YOUR  
INFORMATION

Don Collingsworth, Chairman  
North Pacific Fisheries Management Council  
PO Box 103136  
Anchorage, Alaska 99510

Dear Chairman Collingsworth,

Subj: Comments on the EA/RIR/IRFA for 4C Halibut Fishery(11/14/89)

Based on our review of the above document, it is our conclusion that the 4C halibut district can be best managed under Alternative 2, which allows the greatest participation by local small vessel fishing boats that participate on the two Pribilof Islands.

Since enactment of the trip limit regime in 4C, the district has been the most consistent in not overrunning IPHC set quota levels. Both islands have developed markets for a product that is consistently high in quality, and not subject to the market glut conditions that characterize the rest of this fishery. A small degree of community economic benefit, and economic development on the islands have also been positive benefits.

The down side is that some of the larger vessels will miss out on a few one day openings away from their other fishing activities on other species in the Bering Sea. We believe that the rest of the halibut fleet can survive this minimal impact on a 70 million pound quota. In a single vote last year the NPFMC had a far greater impact on Bering Sea halibut fisheries by raising the bycatch limits for factory trawlers from 4000 to 5333 metric tons. The effective resource allocation here is less than 3% than what was allocated to a nonlocal fishery in that question.

We believe that the proposed Alternative 2 proposal is the best and fairest for the developing fisheries in our community at this time, and urge the North Pacific Council to adopt this proposal of Central Bering Sea Fishermen's Association and forward to the IPHC. The efforts of our small vessel fishermen to establish a Pribilof fishery is a key element in economic development plans for our community.

Thank you for your support of local fishery development efforts on the Pribilofs.

Sincerely,



Ron P Philemonoff, Chairman  
Tanadguisix Corporation



NOV 27 1989

## HOME HARBOR SEAFOODS INC.

COPY FOR YOUR  
INFORMATION

November 9, 1989

Mr. Perfenia Pletnikoff Jr.  
Central Bering Sea Fishermen's Council  
1500 West 33, Suite 220  
Anchorage, Alaska 99503

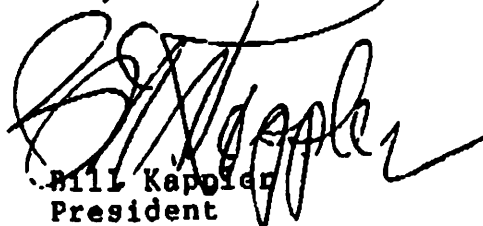
Dear Mr. Pletnikoff,

I am writing you this letter as testimony to the consistent quality of Pribilof Island halibut produced on St. George Island. We have had the exclusive pleasure of selling the total of St. George production for five years now and we still have the same customers who wait each year to promote this special fishery.

Just a few of the Seattle area restaurants that feature our halibut have been Ray's Boathouse, Arnies, Ivar's and Anthony's Home Port. We still get the same compliments each season as we did in 1985 from buyers and chefs.

Please do everything possible to maintain this resource for the island fishermen so we can continue to represent the finest quality halibut available. We hope one day to be able to include St. Paul's production as well.

Very best regards,



Bill Kappeler  
President

BK:ddk

Copy to: Anthony Mercurief  
St. George  
North Pacific Fisheries



## ALEUT



COMMUNITY



COUNCIL



P.O. Box 86  
ST. PAUL ISLAND  
ALASKA 99660  
PHONE # 546-2211 OR 546-2380

November 24, 1989

Don Collingsworth, Chairman  
North Pacific Fisheries Management Council  
PO Box 103136  
Anchorage, Alaska 99510

Dear Chairman Collingsworth,

Subj: Comments on the EA/RIR/IRFA for 4C Halibut Fishery (11/14/89)

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Since enactment of the trip limit regime in 4C, the district has been the most consistent in not overrunning IPHC set quota levels. Both islands have developed markets for a product that is consistently high in quality, but not subject to the market glut conditions that characterize the rest of this fishery. A small degree of community economic benefit, and economic development on the islands have also been positive benefits.

The down side is that some of the larger vessels will miss out on a few one day openings away from their other fishing activities on other species in the Bering Sea. We believe that the rest of the halibut fleet can survive this minimal impact on a 70 million pound quota. In a single vote last year the NPFMC had a far greater impact on Bering Sea halibut fisheries by raising the bycatch limits for factory trawlers from 4000 to 5333 metric tons. The effective resource allocation here is less than 3% than what was allocated to a nonlocal fishery in that question.

We believe that the proposed Alternative 2 proposal is the best and fairest for the developing fisheries in our community at this time, and urge the North Pacific Council to adopt this proposal of Central Bering Sea Fishermen's Association and forward to the IPHC.

Sincerely, Yours,

*Michael Zacharof*

Michael Zacharof,  
President, Tribal Council

# ST. GEORGE TANAQ CORPORATION

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Fax: (907) 859-2230

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4000 Old Seward Highway, Suite 302  
Anchorage, Alaska 99503  
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NOV 13 1989

November 2, 1989

Clarence G. Pautzke, Executive Director  
North Pacific Fishery Management Council  
605 West 4th. Avenue  
Anchorage, Alaska 99501

Dear Sir,

The halibut quota for area 4C was only 600,000 pounds in 1989. Out of that only 39,000 pounds was caught at St. George. The year before that we caught over 100,000 pounds partly because there wasn't too much participation in the fishery by boats from outside of area 4C like in 1988.

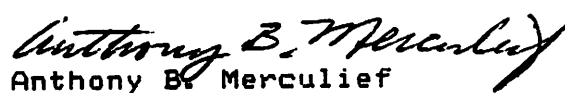
When you compare area 4C to other areas it has a very small quota. We have tried to develop the halibut dayboat fishery here on St. George but it is very difficult when we have big boats from other areas come into 4C and wipe it out before we have a chance at it. To say that the bigger boats should have a fair share of the quota in 4C with only a 600,000 pounds to go around after they have gobbled up millions of pounds in other areas is unfair to local fishermen in 4C.

With a same day delivery and a day after freight delivery of our halibut we can boast the freshest fish to the consumer. That is why when Ivar's in Seattle anticipated that we could deliver for a longer time period than other areas they featured our fish in their restaurants. They should know a good product when they see one.

For these reasons the St. George Tanaq Corporation asks that you support the halibut proposal from the Central Bering Sea Fishermen's Association which asks for a trip limit of 10,000 pounds per trip for 100% of the quota for area 4C for the 1990 season.

Thank you for your consideration of this matter.

Sincerely,

  
Anthony B. Mercurief  
President  
St. George Tanaq Corporation

North Pacific Fishery Management Council

DRAFT Halibut Fishery Regulations  
Area 4C - 1990

**ALTERNATIVE 1**

No change in regulations.

**ALTERNATIVE 2**

In § 301.10, revise paragraph (d) to read as follows:

(d) Notwithstanding paragraph (b) of this section, all vessels fishing in Area 4C shall be limited to a maximum catch of 10,000 pounds (4.5 metric tons) of halibut per fishing period.

NOTE: The Halibut Management Team recommends that since the delayed season opening in this alternative is not overtly allocative, the Council could simply recommend this provision to the International Pacific Halibut Commission.

**ALTERNATIVE 3**

In § 301.10, paragraph (d) is revised to read as follows:

(d) Notwithstanding paragraph (b) of this section, all vessels fishing in Area 4C shall be limited to a maximum catch of 20,000 pounds (9 metric tons) of halibut per fishing period.

§ 301.13 is revised by deleting paragraph (b) and renumbering paragraphs (c), (d), (e) ... as paragraphs (b), (c), (d) ..., and deleting all reference to paragraph (c) of this section.

§ 301.21 is renumbered to be § 301.22 and a new § 301.21 is added to read as follows:

§ 301.21 Exclusive area.

No person other than a person who lands his total annual halibut catch at a port within Area 4C may fish for halibut in Area 4C from any vessel until 80 percent of the Area 4C catch limit has been taken.

**ALTERNATIVE 4**

The Council would make recommendations to the IPHC for regulation changes that achieve the intended allocative effect.

halibut.reg

North Pacific Fishery Management Council

DRAFT Halibut Fishery Regulations  
Area 4C - 1990

**ALTERNATIVE 1**

No change in regulations.

**ALTERNATIVE 2**

In § 301.10, revise paragraph (d) to read as follows:

(d) Notwithstanding paragraph (b) of this section, all vessels fishing in Area 4C shall be limited to a maximum catch of 10,000 pounds (4.5 metric tons) of halibut per fishing period.

NOTE: The Halibut Management Team recommends that since the delayed season opening in this alternative is not overtly allocative, the Council could simply recommend this provision to the International Pacific Halibut Commission.

**ALTERNATIVE 3**

In § 301.10, paragraph (d) is revised to read as follows:

(d) Notwithstanding paragraph (b) of this section, all vessels fishing in Area 4C shall be limited to a maximum catch of 20,000 pounds (9 metric tons) of halibut per fishing period.

§ 301.13 is revised by deleting paragraph (b) and renumbering paragraphs (c), (d), (e) ... as paragraphs (b), (c), (d) ..., and deleting all reference to paragraph (c) of this section.

§ 301.21 is renumbered to be § 301.22 and a new § 301.21 is added to read as follows:

§ 301.21 Exclusive area.

No person other than a person who lands his total annual halibut catch at a port within Area 4C may fish for halibut in Area 4C from any vessel until 80 percent of the Area 4C catch limit has been taken.

**ALTERNATIVE 4**

The Council would make recommendations to the IPHC for regulation changes that achieve the intended allocative effect.

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