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December 1, 2014

Mr. Dan Hull
Chair
North Pacific Fishery Management Council
605 West 4th Ave, Ste 306
Anchorage, AK 99501

Dear Chairman Hull and Members of the Council,

Re: C1 2015 Halibut Charter Management Measures

As you are aware, ADFG's preliminary estimate is that the charter sector exceeded their quota in 2014 by 15% in Area 2C and 23% in Area 3A. The preliminary estimate is that 2C was 114,572 pounds over its 761,000 pound quota and 3A was 413,374 pounds over its 1,760,000 pound quotaⁱ. These significant overages during the first year of the catch sharing plan are of concern.

In establishing the management measures for 2015, we request you consider the following:

- ADFG projects the harvest for the coming year by extrapolating prior year harvest and this does not take into account economic factors and State actions. We suggest that the State of Alaska and the Council consider all information available in making this projection including economic data available from other departments. For example, the State and Council should consider upward harvest pressure from the following *inter alia*, especially from non-resident charter clients:
 - \$15M in state funding to promote tourism in FY 2015 since this has the potential to increase halibut charter anglers.
 - ADFG has a goalⁱⁱ of increasing angler licenses to 2008 levels, even in fisheries that are fully utilized. As part of this program ADFG has staff designated for Angler Recruitment and Retention and has commissioned a studyⁱⁱⁱ by Southwick Associates to improve recruitment and retention.
 - The overall improving national economy which will likely increase the disposable income of charter clients.
 - Recent activity to expand^{iv} or renovate^v fishing lodges.

- Since the 2C reverse slot limit went into effect in 2012 (before the catch sharing plan), the charter sector has successfully marketed the opportunity for “trophy” halibut such that the harvest has increased from 42,426 halibut to a preliminary 67,942 halibut – a 60% increase in three years

- The long term Council goal is that the charter sector should be at or below their quota over time. Given the magnitude of the preliminary 2014 overages, the Council needs to take appropriate action in 2015 to compensate for the 2014 overages before the cumulative overages get out of hand. As you know, an IFQ holder who exceeds their quota by more than 10% loses the value of the 10% and the value of the overage greater than 10%. What we expect of the Council is a level playing field for all commercial sectors.

We appreciate the opportunity to comment.

Sincerely,



Tom Gemmell
Executive Director

Alaska Longline Fishermen's Association • Cordova District Fishermen • Deep Sea Fishermen's Union • Fishing Vessel Owners Association • Halibut Association of North America • Kachemak Bay Fisheries Association • North Pacific Fisheries Association • Petersburg Vessel Owners Association • Sea Food Producers Cooperative • Southeast Alaska Fishermen's Alliance • United Cook Inlet Driftnetters Association • United Fishermen's Marketing Association • United Southeast Alaska Gillnetters Association

ⁱ [C1 ADF&G sport fishery report to IPHC 2014.pdf](#)

ⁱⁱ https://omb.alaska.gov/ombfiles/16_budget/Transition/FY15_MP_Binder_FG.pdf

ⁱⁱⁱ <https://vimeo.com/112340876>

^{iv} [Steamboat Bay Lodge](#)

^v Elfin Cove Resort [renovated](#)