

Chris Oliver  
Assistant Administrator for Fisheries National Marine Fisheries Service  
Silver Spring, MD

Dear Mr. Oliver:

The undersigned leaders of the Alaska Charter Halibut fishery have had extensive deliberations with stakeholders to discuss the many challenges and uncertainties facing our industry this summer in Alaska during the COVID-19 pandemic.

Here are the facts, the charter industry is ready, willing and able to provide access for anglers to the halibut resource. Unlike many charter fisheries you manage, we provide access to both resident and non-resident anglers who use our boats to fill their freezers with fish. Halibut is a consumptive fishery, where many of our clients fish for food more than sport.

We are experiencing significant charter cancellations and large reductions in client interest for the 2020 season from the cancellation of cruise ship sailings across the Gulf of Alaska as well as travel restrictions in Alaska and elsewhere on independent travelers. Charter operators, like all fishermen, are resilient and committed to surviving this down turn and want to continue to help families get access to food.

There are a number of uncertainties related to the duration and extent of travel restrictions related to COVID-19 and the impacts on charter fishery operations this season. While we can't answer these questions now, we can hedge our bets to make the most of what we do know.

We know that if the travel restrictions are not lifted in the next few months, we will have largely a fishery consisting of Alaska residents and some limited number of nonresident anglers who obeyed the 14 day quarantine. Relaxing the bag and size limits for charter anglers while the travel ban is in place will allow Alaska residents and other anglers already in Alaska or traveling to Alaska in compliance with the travel restrictions access to the halibut resource and an opportunity to bring halibut home in these challenging times. Although we anticipate the number of anglers using charter vessels would be substantially less than the total number of anglers expected in a typical charter season, any increased angler participation over what we are facing now would benefit charter operators. We anticipate that total charter harvest would remain below the charter sector allocation if the bag limit for charter anglers is relaxed for a limited period this season due to the significant decline in total number of charter anglers. Therefore, this proposal would not create a conservation concern for halibut as long as the relaxed measures were only in place during the travel ban.

We request that the Council and IPHC **amend the Area 2C and 3A charter angler management measures for 2020 while the State of Alaska COVID-19 interstate travel restrictions are in place. For IPHC regulatory Area 3A, make the charter bag limits 2 halibut of any size and remove annual limits and day of the week closures. Once travel restrictions are lifted, all charter management measures implemented in the March 2020 IPHC regulations would be reinstated.**

**For IPHC regulatory area 2C, revise the reverse slot limit from U40080 to U45080 for charter anglers once travel restrictions are lifted.**

Our second request is **to allow for a roll-over of any unused charter allocation from 2020 to 2021 in IPHC regulatory areas 2C and 3A.** If the 2020 charter fishing season is severely limited as we anticipate, a roll-over of the unused allocation would provide additional harvest opportunity in 2021 to help charter operators rebuild their businesses. Roll overs of unused quota are used in other fisheries, and we feel

strongly that the charter sector will need tools to attract clients back to Alaska after the threat of COVID-19 has subsided.

Thank you for considering our requests. We are available at any time to answer questions and look forward to working with you to safely get Alaskans back to work and restarting the economies of coastal communities in Alaska.

Sincerely,

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