



Stakeholder statements on regulatory proposals

PREPARED BY: IPHC SECRETARIAT (3, 24, & 31 JANUARY, 2 FEBRUARY 2020)

PURPOSE

To provide the Commission with a consolidated document containing 'Statements' from stakeholders submitted to the Commission for its consideration at the 96th Session of the IPHC Annual Meeting (AM096).

BACKGROUND

During 2018 and 2019, the IPHC Secretariat made improvements to the [Fishery Regulations](#) portal on the IPHC website, which includes instructions for stakeholders to submit statements to the Commission for its consideration. Specifically:

"Informal Statements by stakeholders should be submitted as an email to the following address, secretariat@iphc.int, which will then be provided to the Commissioners as Stakeholder Statements at each Session.

DISCUSSION

[Table 1](#) provides a list of the Stakeholder Statements received by 1200 on 2 February 2020, which are provided in full in the Appendices. The IPHC Secretariat does not provide commentary on the Statements, but simply collates them in this document for the Commission's consideration.

Table 1. Statements received from stakeholders by received by 1200 on 2 February 2020.

Appendix No.	Title and author	Date received
Appendix I	Statement by Rob Greenfield	11 April 2019
Appendix II	Statement by Garrett Elwood	25 October 2019
Appendix III	Statement by Alaska Longline Fishermen's Association (ALFA)	19 December 2019
Appendix IV	Statements by Mary and Mike Huff	28 December 2019 & 14 January 2020
Appendix V	Statement by Frank Casey	01 January 2020
Appendix VI	Statement by Joel Steenstra	09 January 2020
Appendix VII	Statement by Michael Pettis	11 January 2020
Appendix VIII	Statement by Jake Fletcher	12 January 2020
Appendix IX	Statement by Central Bering Sea Fishermen's Association (CBSFA)	13 January 2020
Appendix X	Statement by David Croonquist	14 January 2020
Appendix XI	Statement by Oregon Coast Anglers	16 January 2020
Appendix XII	Statement by Prince William Sound Charter Boat Association	25 January 2020
Appendix XIII	Statement by Larry Cobb	26 January 2020
Appendix XIV	Statement by Larry Carroll	26 January 2020
Appendix XV	Statement by Steve Ranney	26 January 2020
Appendix XVI	Statement by Luther Andersen	29 January 2020

Appendix XVII	Statement by Southeast Alaska Guides Organization	31 January 2020
Appendix XVIII	Statement by Don Lane	31 January 2020
Appendix XIX	Statements by Diane and William Gentry	31 January 2020
Appendix XX	Statement by Timothy Cashman	31 January 2020
Appendix XXI	Statement by Clive Stevens	01 February 2020
Appendix XXII	Statement by Seth Mosley	01 February 2020
Appendix XXIII	Statement by Brenda Swann	01 February 2020
Appendix XXIV	Statement by David Ardinger	01 February 2020
Appendix XXV	Statement by Kamell Alloway	01 February 2020
Appendix XXVI	Statement by Aaron Mahoney	01 February 2020
Appendix XXVII	Statement by Kristyn Alloway	01 February 2020
Appendix XXVIII	Statement by Griffin Woodall	01 February 2020
Appendix XXIX	Statement by Dan Spies	01 February 2020
Appendix XXX	Statement by DeAnn Luloff	01 February 2020
Appendix XXXI	Statement by Sean Prendergast	01 February 2020
Appendix XXXII	Statement by Raymond Nix	01 February 2020
Appendix XXXIII	Statement by Gerri Martin	01 February 2020
Appendix XXXIV	Statement by Mel Erickson	01 February 2020
Appendix XXXV	Statements by Thad and Heidi Stokes	01 February 2020
Appendix XXXVI	Statement by Bill Eckhardt	01 February 2020
Appendix XXXVII	Statement by Kevin Cawley	01 February 2020
Appendix XXXVIII	Statement by Bob Savino	02 February 2020
Appendix XXXIX	Statement by Diana Alloway	02 February 2020
Appendix XL	Statement by John Baker	02 February 2020
Appendix XLI	Statement by Trey Graham	02 February 2020
Appendix XLII	Statement by Bryson Gilbert	02 February 2020
Appendix XLIII	Statement by John Moline	02 February 2020
Appendix XLIV	Statement by Kyle Stene	02 February 2020
Appendix XLV	Statement by Homer Charter Association	02 February 2020
Appendix XLVI	Statement by Jason Ogilvie	02 February 2020
Appendix XLVII	Statement by Brian Baker	02 February 2020

APPENDICES

As listed in [Table 1](#).

APPENDIX IStatement by Rob Greenfield

(Note that this statement was submitted in response to an IPHC survey of license holders in IPHC Regulatory Area 2A in April 2019, which is quoted in italics below.)

From: Rob Greenfield <rtg327@hotmail.com>

Sent: Thursday, April 11, 2019 6:37 AM

To: IPHC Secretariat <secretariat@iphc.int>

Subject: Re: Survey of IPHC Regulatory Area 2A Commercial License Holders

Dear IPHC secretariat, why not solve the derby dilemma by making the 2A directed commercial fishery an IFQ fishery based on the vessels past catch history. Exceeding the TAC would be impossible if implemented. Vessels would be required to have a VMS and declare that they will be fishing halibut before they leave the dock so enforcement can do their job. This would be a win win solution to this issue. Fishermen would get top dollar for their fish because the TAC won't be harvested in 10 hours. The fishery will become much safer because fishermen won't be forced to go in inclement weather in order to get their fair shot at the fish. Halibut mortality will drop drastically. Gear tangles between boats will not happen anymore. Lost gear= lost fish. Please consider this option. It seems the most sensible to me.

Best regards, Robert Greenfield (f/v Remembrance)

On Apr 10, 2019, at 10:12 AM, IPHC Secretariat <secretariat@iphc.int> wrote:

Dear IPHC Regulatory Area 2A commercial license holder,

As you may recall, in 2018 the IPHC Secretariat undertook a survey of Regulatory Area 2A commercial license holders with the intention of changing from the current 10-hour derby fishery, to a longer period of either 5 or 10 days in duration. The survey resulted in an overwhelming response that you wanted to move away from the current 10-hr derby fishery. Your opinions and voting were provided to the IPHC at its 95th Annual Meeting in January 2019 for potential decision (paper [IPHC-2019-AM095-PropA2](#)).

At the 95th Annual Meeting of the IPHC, the Pacific Fisheries Management Council and the Washington Department of Fish and Wildlife lobbied heavily for the Commission not to proceed with a move to a longer fishing period. As a result, the IPHC Commissioners did not agree to move ahead with a 5- or 10-day fishing period for 2019, but rather to retain the current 10-hour fishing derby, with additional opening dates to be determined.

As part of the Fishery Regulation development and finalization process, the IPHC Secretariat established an additional fishing opportunity on 27 June 2019, the day following the first fishing period on 26 June 2019, with the intention of allowing license holders to fish a multi-day 10-hr derby early in the season.

However, the IPHC has received anecdotal feedback that license holders may prefer that the 27 June derby day not be held, and as a result, we would again like to seek

your input regarding fishery schedule preferences. Thus, we would appreciate your response to the following question:

Question: Which option do you prefer for the scheduling of the 10-hour fishing periods for 2019? Please select one of the following:

- Wednesday 26 June and Thursday 27 June (consecutive days).
The third fishing period would then be Wednesday 10 July, quota permitting.*
- Wednesday 26 June and Wednesday 10 July (two weeks apart).
The third fishing period would then be Wednesday 24 July, quota permitting.*

Please submit your preference at: <http://bit.ly/2ACommSurvey>. This survey will remain open until 1630 hours, Seattle time, on Wednesday 24 April 2019.

Sincerely,

IPHC Secretariat

[back to [Table 1](#)]

APPENDIX II

Statement by Garrett Elwood

(Note that this statement was originally submitted as a Regulatory Proposal, but with the concurrence of the author was reclassified as a stakeholder statement on IPHC Secretariat Regulatory Proposal [IPHC-2020-AM096-PropA4](#).)

Requested By:	Garrett Elwood
Requester E-mail	FVWESTERNFREEDOM@GMAIL.COM
Date Requested	10/25/2019
IPHC Regulatory Areas that may be affected	All
Fishery Sectors	• Commercial
Explanatory Memorandum	Adjust Section 16 of the Halibut Regulations Vessel Clearance in IPHC Regulatory Area 4 to allow vessels using Electronic Monitoring to fish without obtaining clearance and eliminate VMS requirement. This regulation is outdated and puts an unfair burden on harvesters in Area 4 resulting in higher harvesting costs. The need to check in and out of Area 4 by defacto suggests that area 4 harvesters are somehow more likely to cheat by trying to land fish from other areas. A vessel using EM in the fixed gear hook and line Halibut fishery should not be required to either pay for VMS service, and or check in and out of a port. For example a vessel with a monitored EM trip logged, fishing in Area 3B around Sanak should be allowed to cross the line at Davidson Bank and make some 4A sets, just as they are currently allowed to do so a couple hundred miles away at the 3A/3B line. Low Quotas, poor prices, and a substantial distance to travel to Akutan from the 4A line are all reasons to support a change to this outdated and costly regulation. Simple language could be added to the end of Section 16 after VMS check in exemption.
Suggested Language	Regulatory Vessels with quotas in Area 4 are exempted from the requirement to obtain clearance to fish if: They have a current VMP and have either been selected for an observed EM trip or have requested EM coverage.

[back to [Table 1](#)]

APPENDIX III

Statement by Alaska Longline Fishermen's Association (ALFA)

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

December 16, 2019

IPHC Commissioners
2320 West Commodore Way Ste 300
Seattle, WA 98119-1287

Subj: Annual Meeting Comments

Dear Commissioners and Halibut Stakeholders,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA members fish for halibut across all Gulf of Alaska management areas and some range into the Bering Sea/Aleutian Island. Our members have significant investment in halibut quota share and depend on the halibut resource for their livelihood.

ALFA members recognize that the halibut stock has experienced a period of below average recruitment and that declines in the spawning biomass are projected until stronger year classes enter the fishery. We also understand that the preliminary 2020 TCEY recommendation presented at the recent Interim Meeting reflect a correction in the sex ratio of the commercial catch, which has had a downward effect on TCEYs.

Far more difficult to accept is the dramatic redistribution of catch away from Alaska's commercial and charter halibut fishermen to Area 2B and, to a lesser extent 2A. From our review of the data, 12.5% of the surveyed abundance of halibut is in Area 2B, yet Area 2B ends up with 19.5% of the TCEY based on the preliminary TCEY recommendations; likewise, 2% of the surveyed abundance is in Area 2A, but 5.2% of the TCEY is distributed to 2A. In effect, the Interim Meetings preliminary TCEY's, if adopted would re-distribute approximately 10% of the coastwide TCEY or more than 3 million pounds from Alaska to Areas 2A and 2B given the current F46 reference harvest rate (HR). This reallocation will cost Alaska fishermen and communities in excess of \$20 million dollars in lost first wholesale value and more than \$30 million dollars in lost economic activity¹. The preliminary TCEY's as presented at the recent Interim Meeting fund the stability negotiated by US IPHC Commissioners last year for Areas 2A and 2B, at the expense of Alaskan fishermen, processors and coastal communities, creating turmoil and setting into motion intense conflict. **ALFA members urge the IPHC Conference Board (CB), Processor Advisory Board (PAB), and IPHC Commissioners to work towards an alternative approach.**

Our first and strongest recommendation is for CB, PAB, and IPHC Commissioners to identify a 2020 fishing harvest rate and initial distribution procedure that assigns a consistent base apportionment across all areas prior to assigning Areas 2A and 2B their negotiated bonus allocations. As the Commissioners may recall, last year all U.S. stakeholders engaged in the IPHC process—fishermen and processors—arrived at unanimous support for a distribution approach that was consistent across all areas. While acknowledging the Commissioners' ability to make tactical changes to that distribution procedure, stakeholders were also unanimous that these tactical changes should not come at the expense of other areas. Instead of following this recommendations, IPHC Commissioners focused on stabilizing Areas 2A and 2B, rather than identifying an interim base approach that is consistent across all areas, thus creating the gross inequity for Alaska. ALFA strongly supported the unanimous agreement identified last year, and while it will be nearly impossible to achieve that level of agreement again (given the action taken by IPHC Commissioners last year and the current stock

¹ Based on 2019 NMF5 cost recovery ex-vessel values, and 2016-2018 average first wholesale multiplier from Alaska CORE reports, and estimated 1.5 multiplier for economic activity.

dynamics), we recommend, in the strongest possible terms, that the IPHC Commissioners work toward a fair and consistent base distribution approach for Canada and all U.S. areas. After establishing the base apportionments, if Canada continues to demand the disproportional allocations to which the US Commissioners agreed, the extra allocations should be taken out of the resource instead of out of the Alaska catch limits. While we recognize this will increase the overall harvest rate, that is more equitable than placing the reapportionment burden entirely on Alaska stakeholders.

With respect to a recommendation on a specific harvest rate (HR) and distribution procedure, ALFA members recall that last year, after thoughtful review of the long-term performance of HRs from F30 to F55, the IPHC’s MSAB unanimously recommended a target HR of F42-F43 while noting that HRs more aggressive than F40 increased volatility and risk of low stock sizes, and HRs more conservative than F46 provided minimal additional long-term conservation benefits. The MSAB also identified that a smoothing procedure, such as slow-up/fast-down (SUFDF) or a maximum change of 15% coast-wide was needed to limit volatility to acceptable ranges. At the recent Fall 2019 MSAB meeting, the group further refined their HR recommendation by unanimous agreement to an F43 target HR in order to maintain a target stock size related to MSY, and agreed to further investigate the long-term impacts of tactical HR exceedances by Commissioners into a “buffer zone” of up to F40 or greater. The MSAB also recommended further work on smoothing procedures (i.e., SUFDF with a cap of max 15%). In consideration of the MSAB work, **ALFA members recommend a base harvest rate of F43 to F46 and request IPHC Commissioners apply a consistent base harvest distribution policy across all areas then apply short-term tactical changes that do not result in a zero-sum conflict to meet short-term needs until the MSAB reports the results of their work in January 2021.**

With respect to a distribution procedure, ALFA believe the components of the distribution process should include:

- A reference harvest rate between F43 and F46;
- A base distribution based on surveyed distribution of catch or a three-to-five- year rolling average of surveyed stock distribution;
- A smoothing procedure such as SUFDF or 15% max as recommended by MSAB;
- The opportunity for tactical adjustments, up or down, of area catch limits based on area metrics/indices and tactical considerations.
- A final coastwide TCEY that does not exceed F40 until the MSE process is complete and the MSAB has reported their results next year.

The tables below provide a number of scenarios that illustrate possible approaches consistent with these principles. We hope that stakeholders and the Commissioners will review and consider these scenarios. While the outcomes differ, what is most important to our membership is that the process be transparent, equitable, and consistent across the fishery; and that the negotiated Areas 2A and 2B bonus allocations be taken out of the resource based on IPHC Commissioner judgement of associated impacts instead of out of the Alaska catch limits until a long-term distribution policy is established.

Reference tables: (Note: Tables below may contain rounding errors and differ slightly from IPHC staff-derived final numbers. ALSO- the following reference tables DO NOT include U26 compensation)

- Interim Meeting 2020 reference Harvest Rates (HRs).

	2019 Adopted	2020 Coastwide TCEY Options								
		F47	F46	F45	F44	F43	F42	F41	F40	15% max change
2020 Coastwide TCEY (mlbs)	38.6	30.7	31.9	33	34.1	35.2	36.2	37.3	38.6	32.8
% Difference from 2019 adopted	0.0%	-20.5%	-17.4%	-14.5%	-11.7%	-8.8%	-6.2%	-3.4%	0.0%	-15.0%

2020 Distribution Options:

- Option 1: F 46 Modeled survey O32% adjusted by relative HRs of 1 (2A, B, C, 3A) & 0.75 (3B, 4A, 4B, 4CDE)

Option 1	Current Survey + Current HR: No 2A/2B bonus	2A	2B	2C	3A	3B	4A	4B	4cde	Total
		0.70	4.43	5.42	10.72	3.22	2.46	1.37	3.51	31.8
% Change from 2019 adopted		-57.5%	-35.1%	-14.5%	-20.6%	11.1%	26.6%	-5.4%	-12.3%	-21.9%

- Option 2: F 46 base TCEY distribution from 2019 Interim meeting with 2A/2B bonus deducted from Alaska (IPHC Staff Presentation at Interim Meeting)—ALFA Opposes!

Option 2	2A & 2B Bonus deducted from Alaska TCEYs	2A	2B	2C	3A	3B	4A	4B	4cde	Total
		1.65	5.8	4.97	9.83	2.96	2.25	1.26	3.22	31.9
% Change from 2019 adopted		0.0%	-15.7%	-21.5%	-27.2%	1.9%	16.1%	-13.2%	-19.5%	-17.4%

- Option 3: F 46 base distribution with 2A/2B bonus deducted as "additional mortality"—no zero-sum game)

Option 3	2A & 2B Bonus as additional mortality	2A	2B	2C	3A	3B	4A	4B	4cde	Total
		1.65	5.81	5.42	10.72	3.22	2.46	1.37	3.51	34.16
% Change from 2019 adopted		0.0	-15.0%	-14.5%	-20.6%	11.1%	26.6%	-5.4%	-12.3%	-11.5%

- Option 4: F 46 base with SUFD applied to Alaskan Area's for base TCEY, 2A/2B bonus deducted as "additional mortality" (note: SUFD was unanimously supported by the US sectors of CB and PAG in 2019)

Option 4	2A,2B Bonus as additional mortality + SUFD for Alaska	2A	2B	2C	3A	3B	4A	4B	4cde	Total
		1.65	5.81	5.9	12.1	3.33	2.63	1.41	3.75	36.6
% Change from 2019 adopted		0.0%	-15.0%	-7.2%	-10.3%	14.8%	35.5%	-2.7%	-6.1%	-5.3%

Relative Harvest Rates--ALFA does not support changing the relative HRs between management areas at this time. Rather, we support the MSAB recommendation to fully evaluate relative HRs as part of the MSE process and present findings to IPHC Commissioners at the January 2021 Annual Meeting. Recent "Yield Per Recruit" (YPR) information was presented to the MSAB in document SRB015.² While this report does indicate a change in YPR values for Region 4 between 1999 and 2018, it also notes that many factors need to be considered in evaluating relative HRs, including migration, fishery selectivity, and sex ratios in addition to YPR metrics. The interplay of these factors and relative HRs will affect coast-wide yield through changing fishery selectivity and sex ratios, as well as have down-stream effect on other management areas associated with migration. **ALFA members recognize the challenges Region 4 faces based on increasing bycatch in non-directed fisheries and preliminary 2020 TCEYs. We strongly recommend IPHC Commissioners address these challenges through a short-term tactical adjustment to TCEY rather than HR adjustments until the MSE process has fully evaluated the long-term effect of differential HRs and reported on the full impacts in January 2021.**

² <https://www.iphc.int/uploads/pdf/srb/srb015/iphc-2019-srb015-09.pdf>

U26 Compensation--For the past six years, Area 2B fishermen have advocated for, and Canadian Commissioners have claimed, an extra million to two million pounds for Area 2B to compensate Canada for halibut bycatch in Alaska waters. This compensation led to consistently high catch limits for Area 2B relative to surveyed distribution and relative to catch limits in adjacent areas. When U.S. Commissioners last year agreed to an interim distribution strategy that based 70% of Canada's distribution on these historic high catch limits, that bycatch compensation was memorialized—at least for the interim. When Canada then demanded to be (again) compensated for bycatch—a specific U26 component—Canada in effect double-dipped: compensated once for bycatch in the historic share component and again for an additional bycatch compensation through the U26 adjustment. ALFA members object to Canada receiving a set distribution when other areas have not been awarded comparable stability, and even more strenuously object to Canada being not once but twice compensated for the same bycatch prior to IPHC Commissioners review of the MSE report in January 2021 and identification of a long-term distribution policy.

ALFA would point out that Area 2C, which successfully banned trawling in 1998, has the lowest U26 bycatch of any areas, Areas 2A and 2B included. It is unconscionable to our members that a scenario was presented at the Interim Meeting where the 2C TCEY, an area with virtually zero U26 bycatch, would be *reduced* by a further 380,000 pounds when Area 2B, the adjacent area with more U26 bycatch, would be *increased* by 400,000+ pounds using the same management procedure. If Area 2B deserves bycatch compensation, then Area 2C deserves the same in equal or greater measure.

To be clear, ALFA continues to work hard to secure reductions in halibut bycatch, and we welcome the engagement of IPHC Commissioners as halibut resource advocates. However, it is pre-mature to award U26 compensation prior to the conclusion of the MSE process and MASB report in January 2021, and it is inequitable to double-compensate Area 2B while penalizing Area 2C. Prior to IPHC Commissioners deciding on a final U26 compensation policy, scenarios other than the one presented at the Interim Meeting should be considered. Further work on this concept is needed and should be part of the 2021 distribution agreement.

In closing, ALFA urges the Commissioners to establish a reference harvest rate range of F43 to F46 and to identify a consistent base harvest distribution policy that treats all areas equitably. If the Commissioners feel obligated to then award additional quota to specific areas to mitigate impacts or meet political obligations, those bonus allocations should be taken out of the resource rather than deducted from Alaska's TCEYs. Finally, ALFA **STRONGLY** objects to assigning Area 2B a "historic" share based on years of disproportionate harvest justified by bycatch accusations against Alaska PLUS a U26 bycatch adjustment. The double-dip against Alaska halibut stakeholders is unacceptable.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
Executive Director

[\[back to Table 1\]](#)

APPENDIX IV

Statements by Mary and Mike Huff

E-mail	flatfish@gci.net
Subject	Proposed Halibut Regulations 3A
Message	<p>My husband and I own Captain Mike's Charters. We are horrified with thee new regulation proposals for area 3A for the Charter Industry. We have successfully run our business for 35 years with the regulations becoming tighter every year despite the charter industries attempts to fight it. These new cuts, based on the longliners take of too many females, which is crazy in of itself, are destined to put us out of business. Our Grandson had proudly taken over the helm two years ago. He now does not intend to fish because the regulations will limit him so much that he would not be able to make a decent living.</p> <p>The limiting of the halibut charter segment based on the data from the longliners is like comparing apples to oranges and the negative effects are devastating.</p> <p>First of all, folks who fish on charters book well in advance and get hotels and lodging etc. I have folks on my books from before these drastic proposals reared their ugly heads. It has all but ruined my business and I have to completely stop booking now until we know what the regulations are going to be. I also cannot book charters when I don't know if my Captain (our grandson) will want to fish. The changes to regulations should be at least a year out so we have time to effectively run our businesses.</p> <p>The economic impact of the Charter Industry on our town and the peninsula is huge. Losing another day of fishing would most likely ruin our industry and impact the economy of our town and the peninsula. I talked to the manager of our local Safeway and he most definitely sees the lower profits on Wednesdays in the summer.</p> <p>I don't think anyone not in the industry realizes how difficult this makes it to run a charter company. Prebookings are a must. Walk ins (folks who just show up at our offices) do not fill the boat. Also they will become extremely frustrated when they come to the Halibut Fishing Capital of the World and can't go halibut fishing that day and possibly not even the next. Word of mouth at the restaurants, campgrounds and hotels go a long way, usually in a positive way but not now. Word will get out that you can't go halibut fishing in our area and it will just roll from there.</p> <p>A seasonal restriction would be much wiser, say from mid may through mid August or something like that. Something we can book around with confidence and not disappointing folks who actually booked well in advance and now are screwed.</p> <p>So all because of some data about longliners we are looking at losing our Captain, probably trying to sell our boat and closing our business we have been in for 35 years.</p> <p>The regulations are just becoming to restrictive and to difficult to book charters around to make it worthwhile.</p> <p>Very unhappy.</p> <p>Sincerely, Mary Huff</p>

Captain Mike's Charters

PO Box 269
Homer, Alaska 99603
(907) 235-8348
"Fishing as it's best."



Here is what I have to say about the proposed upcoming changes to the Halibut Industry in area 3A. This last year there were plenty of halibut for everyone in the charter industry, also the commercial fishermen had a wonderful year. The private boats also had plenty of halibut. So I see no reason to change the amount of fish for the charter industry. So right now we have a lot of people call or write about trips for this coming summer. We are unable to book them not knowing what day or days we will or won't be able to fish. This is not good for our company or anyone's company and makes us look fairly ridiculous. If there is a large change to the regulations a lot of companies will have to go out of business. It will affect the whole town as less people will come to Homer. We need this to not change, there is no reason for it to change. So please leave it the same. We would like to be able to stay in business and would like for the other companies to stay in business as well.

Thank you.

Sincerely,

Mike Huff

Captain Mike's Charters

[back to [Table 1](#)]

APPENDIX VStatement by Frank Casey**E-mail** profishguide@hotmail.com**Subject** Halibut regulations for area 3A**Message** Dear sirs, Any major reductions in any one year can put charter operators into bankruptcy. Reducing a single day of the week reduces revenue by \$20,000 (which by the way was more than my profits for the entire year), not to mention forcing me to refund monies to clients while ruining their planned vacations. A one fish limit is a better suited choice as keeping under 26" fish is bad for the resources. Thanks, Frank Casey Alaska Wildrose Charters Clam Gulch AK. 907-252-4525

[back to [Table 1](#)]

APPENDIX VIStatement by Joel Steenstra**E-mail** alaskawideopen@gmail.com**Subject** 2C Halibut Limits 2020

Message IPHC, My name is Joel Steenstra. I am the owner/operator of Alaska Wide Open Charters in Craig, Alaska. I am an owner of a charter halibut permit. I am disturbed by what I am seeing with the 2020 halibut limits that you will be considering. Suddenly we are looking at a minimum halibut length of 40", with the possibility of a day of the week closure to ensure that minimum halibut length. This is a huge departure to what we have had going on. This is a big deal for 2c as it completely changes the way our halibut limits are structured and I am certain that this is a road we do not want to go down. Once we start appeasing certain geographic regions and business models in 2c, where will it end? I was never asked my opinion on the issue, and neither was any other charter operators in my area that I have spoken to. I do not want to speculate on the motives of those who pushed for this, but this gives a distinct advantage of those who knew this was coming so they could structure their schedules to not fish on Wednesdays. The rest of us are already fully booked and have no options with this. Here in southern 2c we have traditionally run 3 day trips, with a turnover day in between throughout the season. We based our business model off the status quo. Our schedules are set well over a year in advance and we are often fully booked for the majority of the next season before our previous season ends. By tossing a possible Wednesday closure in the mix, it puts big uncertainty into our industry, and our industry hates uncertainty. How are people going to book a year in advance if they are wondering IF they will lose 1/3 of their halibut fishing opportunity the following year? What will it mean to our existing business model that we have had for decades? We were fine with an equal playing field for all operators, and did just fine with a 38" limit as far as our limits went. For changes this big, you need to involve the entire fleet, not just a select few. I urge you to slow this down and not go through with it until all permit holders are allowed to weigh in how it will effect them and this issue is thoroughly analyzed. Joel Steenstra Alaska Wide Open Charters Craig, AK

[back to [Table 1](#)]

APPENDIX VIIStatement by Michael Pettis

From: mkpettis@charter.net

Subject: RE: REMINDER: 2020 IPHC Regulatory Area 2A Non-Treaty Directed Commercial Fishing Periods

To the IPHC Secretariat staff,

I have been involved with the Area 2-A Non treaty directed halibut fishery for forty years.

In the past the commissioners listened to the "conference board " meeting decisions and results along with stock assessments to formulate specific area management decisions.

Now it seems that the "Secretariat" staff comes up with ideas about how things should happen, often without consulting fishery participants for advice. An example of this was the totally unworkable suggestion to have two ten hour openings, fourteen hours apart last season in Area 2-A.

Now it would appear that they are at it again! The staff is proposing either a 34 or a 58 hour season in the name of SAFETY.

Has anyone on the staff ever been at work for 34hours straight? How about 58 hours ? I have, and I can tell you that neither situation is safe.

On a previous 48 hour opening, counting driving out and back I was up for 56 hours straight.

Don't think that a fisherman after a \$6.00/lb bounty isn't willing to push himself and crew to the point of exhaustion.

Let's talk about other considerations like by-catch. Each fisherman participating in a halibut derby in area 2-A has an allocation of sablefish available. normally in a ten hour opening the amount of sablefish caught fits into the fisherman's weekly allocation. If the season lasted 34 or 58 hours, the fisherman would likely catch more sablefish that the weekly quota allows, resulting in discarded dead sablefish.

It has been over twenty years since anyone has made a "night set" for halibut in area 2-A.

There will be areas where significant damage will be done to the fish on the gear left over nite, resulting in wasted halibut. In some cases, more wasted than kept for sale.

So now you send out a survey to get fleet opinion! The problem is that there are only options on your survey that are the changes you want. Where is STATUS QUO???

One would think last years total rebuke of your suggestion would produce a better vetted suggestion.

If you want safety, then give the fleet in area 2-A what everyone else has in the halibut fishing world. INDIVIDUAL QUOTAS!!!

If you have questions or a response, my phone number is 541-961-5162

Michael Pettis

F/V challenge, F/V Jaka-B

[back to [Table 1](#)]

APPENDIX VIIIStatement by Jake Fletcher

From: Jake Fletcher <fletch_192@hotmail.com>

Subject: Area 2A season changes

Hi my name is Jake Fletcher

I own the fv alligator II a 42' vessel and have participated in the 2A fishery since I was a kid on my dad's vessel. I am sending this email to express my concerns with the proposed season adjustment to 2 or 3 days. With the 10hr opener we have now I am able to fish between 10000 and 12000 hooks which is probably pretty close to what most larger vessels are able to run as well. If this season is lengthened to 2 or 3 days those larger vessels are going to fish every hour of that opener until they catch their limit. I'm smaller than them but I will have to hire more crew and I also will be fishing every hour until my limit is caught. Instead of running 12000 hooks some will be able to run more like 30000 plus hooks while others don't have the same resources to do that. The proposal just turns the fishery into a 3 day derby where people won't be sleeping until the fish is caught and thus will make the fishery more dangerous than it already is. Also we will probably only get one opener due to so many people catching their limits ultimately hurting the small boats that participate in the fishery if the weather is bad for the opener. I already disagree how the quota is split up just by boat length but a change like that would make it even more unfair how the quota is dispersed. If I was unclear or if you have any questions either email me back or call me at 5412973636.


Thanks, Jake

[back to [Table 1](#)]

APPENDIX IX

Statement by Central Bering Sea Fishermen's Association (CBSFA)

W170°



Central Bering Sea Fishermen's Association

P.O. Box 288 | Saint Paul Island, Alaska 99660 | Phone: 907.546.2597 | Fax: 907.546.2450 | cbsfa.com

N57°

January 13, 2020

International Pacific Halibut Commission
2320 West Commodore Way, Ste 300
Seattle, WA 98119

Submitted electronically to secretariat@iphc.int

Dear Commissioners:

At the International Pacific Halibut Commission's (IPHC) Interim Meeting in November 2019, the staff presented a probable FCEY, or fishery quota, of 670,000 pounds (recently upped to 730,000 pounds) for Area 4CDE. This proposed FCEY essentially shuts down the directed halibut fishery in the Bering Sea. The staff made this preliminary calculation based on a continuing decline of the halibut resource, and an increase in halibut bycatch in the Bering Sea.

Given the gravity of this situation, and to avoid a fishery emergency, the Central Bering Sea Fishermen's Association (CBSFA) respectfully submits these comments to the IPHC, proposing policy decisions that would more equitably provide halibut to the directed halibut users in Alaska, and in particular to the halibut-dependent fishermen and communities in Area 4CDE.

We request the Commissioners consider the following policy choices; our letter provides rationale for these requests beginning on Page 3:

1. Increase the harvest rate from .75 to 1 for the Bering Sea.
2. Support the MSAB suggestion to establish a base allocation to all areas, and provide additional fish granted to Area 2A and Area 2B by increasing the harvest rate in those areas.
3. Delay or cancel implementation of the January 2019 agreement to consider exempting 2B from deduction of U26 bycatch.
4. Use bycatch numbers that reflect a three-year rolling average.
5. Assume that the 2020 bycatch may not be equal to the 2019 bycatch, and use a lower number.

CBSFA Background

CBSFA is the management organization for Saint Paul Island under the Western Alaska Community Development Quota Program (CDQ). Since the program was created in 1992, the federal government has been awarding various species of fish (CDQ allocations) from the Bering Sea and Aleutian Islands (BSAI) commercial fisheries to CBSFA. In turn, CBSFA manages these allocations to promote social and economic development at Saint Paul Island.

CBSFA holds CDQ halibut quota in IPHC Area 4C, and coordinates the local fishermen's

participation in the commercial halibut fishery in 4C and 4D. CBSFA operates a halibut cooperative in conjunction with the fishermen, and our two 58-foot fishing vessels - the F/V Saint Paul and the F/V Saint Peter. CBSFA purchases the halibut from the local fleet and partners with Trident Seafoods to custom process and market the halibut. In these low halibut years, the overall operation of the commercial halibut fishery is subsidized by CBSFA. Without the subsidy, it is unlikely that processing operations, or a market for the local fleet, would exist.

For the past ten years the average total annual income to the Saint Paul Island halibut fishermen has been about \$2.7 million per year. Approximately 75 to 100 members of the community participate in the halibut fishery including the skippers, crewmembers and onshore hook baiters. For many of these people, the fishing income accounts for 100% of their annual income. The commercial halibut fishery is the main source of private employment and revenue for the residents of Saint Paul.

Halibut is the lifeblood of Saint Paul Island and a major contributor to the local economy; it is also a historic and customary source of seafood for our community and many other communities of the Bering Sea. Halibut has been a major source of livelihood for the Unangan (Aleut) people of the Bering Sea/Aleutian Islands region since time immemorial.

Halibut Bycatch Reduction

In recognition of the economic and cultural importance of halibut fishing to the people of Saint Paul, CBSFA has focused efforts at the North Pacific Fishery Management Council (NPFMC) over the last 15 years on conservation of halibut, and on improvements to the management of halibut bycatch in the groundfish fisheries in the Bering Sea.

After a five-year process, in 2015 the NPFMC voted to cut the halibut bycatch limits in the Bering Sea groundfish fisheries by 21%. We had asked for a 50% cut. The Council indicated that the reduction was just a first step, and that Abundance-Based Management (ABM) of halibut bycatch was the correct vehicle to further limit bycatch. Another five years of strong efforts have finally led to a set of ABM alternatives for Council consideration and action in the next year or two.

The need for halibut bycatch reduction has been brought powerfully to the forefront by the status of Bering Sea bycatch in 2019 – O26 bycatch was up 31% according to preliminary figures provided by IPHC staff at the Interim Meeting in November.

This jump in bycatch directly affecting the FCEY, in combination with outdated harvest policy, and policy decisions made at the January 2019 IPHC meeting that affect the TCEY, have had a disastrous and disproportionate effect on the halibut available for directed use in Area 4CDE. It is the perfect storm. According to preliminary staff figures at the Interim Meeting (IM) in November, the projected FCEY in Area 4CDE in 2020 could be reduced by 64%, to 730,000 pounds from the 2019 level of 2.04 million pounds.

The local share of the projected 4CDE FCEY of 730,000 pounds would likely not warrant opening the processing plant on Saint Paul, which would effectively result in NO commercial fishery in 4CDE. As we fight the battle at the Council to reduce halibut bycatch, we ask the Commissioners to consider the following policy changes to help maintain our fishery.

Requested Policy Changes

In arriving at the TCEY:

1. Increase the harvest rate from .75 to 1 for the Bering Sea. This would increase the 4CDE FCEY to 1.53 million pounds¹.

According to staff presentations in November, the harvest rates for each region/area were developed 20 years ago, in 1999, and are reflective of the relative productivity of the area at that time. Region 3 was the center of productivity then, and was assigned a harvest rate of 1, while Region 4 was less productive and was assigned a harvest rate of .75. That productivity has changed; Region 3 is declining, while Region 4 is increasing². The policy is outdated. Recent yield-per-recruit analysis³ that examined productivity between the four Biological Regions supported “the application of a lower relative harvest rate in western areas in the historical harvest strategy, but also shows changes in productivity over time that may affect the appropriate current application of relative harvest rates.” The staff clearly indicated in November that Area 4CDE should be receiving a 100% harvest rate instead of 75%.

2. Moderate the effect on Alaska Areas of the Commissioner’s agreements to stabilize Areas 2A and 2B by supporting the MSAB method of protecting Alaska while apportioning additional fish to non-Alaskan Areas. This would increase the 4CDE FCEY to 860,000 pounds⁴.

Data indicates that 12.5% of the surveyed abundance of halibut is in Area 2B, yet Area 2B ends up with 19.5% of the TCEY based on the preliminary TCEY recommendations; likewise, 2% of the surveyed abundance is in Area 2A, but 5.2% of the TCEY is distributed to 2A. In effect, the Interim Meeting’s preliminary TCEY’s, if adopted, would re-distribute approximately 10% of the coastwide TCEY or more than 3 million pounds from Alaska to Areas 2A and 2B given the current F46 reference harvest rate (HR). This reallocation will cost Alaska fishermen and communities millions of dollars in lost first wholesale value and lost economic activity⁵.

Rather than taking fish away from all Alaska Areas in a reallocation to other Areas, we support the MSAB suggestion that the Commissioners establish a fair and consistent base distribution approach for Canada and all U.S. Areas. After establishing the base apportionments, the extra allocation ceded to some areas should be taken out of the resource instead of out of the Alaska catch limits, by increasing the harvest rate in two areas. While we recognize this will increase the overall harvest rate, it will still be below F40, and we believe that it is more equitable than placing the reapportionment burden entirely on Alaska stakeholders.

¹ IPHC-2020-AM096-09 Rev_1, TABLE A4, p. 24. <https://www.iphc.int/uploads/pdf/am/2020am/iphc-2020-am096-09.pdf>

² IPHC-2019-IM095-09 Rev_1, FIGURE 6, p. 7. <https://www.iphc.int/uploads/pdf/im/im095/iphc-2019-im095-09.pdf>

³ IPHC-2020-AM096-12, p. 12.

⁴ IPHC-2020-AM096-09 Rev_1, TABLE A5, p. 26. <https://www.iphc.int/uploads/pdf/am/2020am/iphc-2020-am096-09.pdf>

⁵ Based on 2019 NMFS cost recovery ex-vessel values, 2016-2018 average first wholesale multiplier from Alaska CORE reports, and estimated 1.5 multiplier for economic activity.

3. Delay or cancel implementation of the January 2019 agreement to consider exempting 2B from deduction of U26 bycatch.

The Commissioners agreed in January 2019 to “consider” exempting 2B from the deduction of U26 halibut bycatch in the groundfish fisheries in the calculation of the TCEY for each area. The Canadian rationale was that they do not contribute to the bycatch so should not “pay” for it. If 2B is exempted from the deduction of U26 bycatch, more of a burden is placed directly on the Alaska Areas, as 2A receives a set amount also agreed upon by the Commissioners.

Given that the U26 component of the stock migrates between regulatory areas, Canada cannot claim the benefit of those fish migrating into 2B without also absorbing the impact of the mortality on those same fish.

By Commissioners’ agreement, 2B is already receiving an amount of halibut that is 70% based on a five-year rolling average of the recent historic amounts they received that were NOT based on science or IPHC policy. An additional “bump” through exemption from subtraction of U26 bycatch is neither warranted nor equitable.

In arriving at the FCEY:

4. Use bycatch numbers that reflect a three-year rolling average. This would increase the 4CDE FCEY to 1.02 million pounds⁶.

Currently, the policy is to subtract from the TCEY in each area the amount of O26 bycatch caught in that area in the previous year. In Area 4 in 2019, the large increase in bycatch may reflect conditions specific to 2019 rather than expectations for 2020. As a smoothing device to moderate the effect of one year’s bycatch on the following year, we propose that the IPHC instead use a three-year rolling average of historic O26 bycatch.

Since the IPHC manages the quotas based on the TCEY instead of the FCEY, any smoothing done at the TCEY level (slow up/fast down, etc.) might not ever be enough to moderate a high bycatch year. Additionally, 2017 represents the lowest O26 bycatch level in the last 20 years, and 2017 and 2018 are the first and second lowest values in the last ten years. Once ABM is in place, and if the projected/averaged value seems unreasonable, the Commissioners could “reset the clock” on the averaging values to avoid a projection that’s too high.

5. Assume that the 2020 bycatch may not be equal to the 2019 bycatch, and use a lower number.

In the past, the A80 bottom trawl fleet responsible for much of the Bering Sea bycatch has voluntarily offered their best efforts to avoid bycatch in the coming year, and the Commissioners in response have used a lesser bycatch number to calculate FCEY in 4CDE. It is unknown at this writing whether the A80 sector will be able to make a similar commitment for 2020, but it remains a potential part of the solution for Area 4.

⁶ IPHC-2020-AM096-09 Rev_1, TABLE A2, p. 22.
<https://www.iphc.int/uploads/pdf/am/2020am/iphc-2020-am096-09.pdf>

Table of effects

The following table depicts the effect of each quantifiable choice on the Area 4CDE FCEY for 2020. Clearly, the biggest effect would come from changing the harvest rate to 100% (#1), while the second biggest effect would come from using the three-year rolling average of bycatch (#4).

The table also provides the potential cumulative impacts of the proposed changes. The combination of #1 and #4, the full harvest rate and the three-year rolling average bycatch number, would increase the Area 4CDE FCEY to 1.87 million pounds.

Area 4CDE (M lbs.)	2019	2020 IM	1	2	4	1+4	2+4
			Full Harvest Rate (1.0)	2A 2B Additive	3-yr Average Bycatch		
TCEY	4.00	3.22	4.04	3.34	3.16	4.04	3.34
O26 Bycatch	1.87	2.40	2.40	2.40	2.06	2.06	2.06
U26 Bycatch	1.12	1.09	1.09	1.09	1.02	1.02	1.02
Total Bycatch	2.99	3.49	3.49	3.49	3.08	3.08	3.08
FCEY	2.04	0.73	1.53	0.86	1.02	1.87	1.17
Change to FCEY	1.31	0.00	0.80	0.13	0.29	1.14	0.44

We ask the Commissioners to consider the policy choices we request. The choices follow the science-based principles of the IPHC, and are not arbitrary increases.

The fishermen and halibut-dependent communities in the Bering Sea need your help to survive the devastating effects of both the reduced halibut resource and increased 2019 halibut bycatch. We have spent 10 hard years fighting the battle for reduced halibut bycatch on behalf of the resource and the directed users; please allow us to maintain our fishery and our livelihoods until we can achieve success.

Sincerely,



Phillip Lestenkof, President
Central Bering Sea Fishermen's Association

Cc: Alaska Congressional Delegation
Alaska Governor Mike Dunleavy
Alaska Department of Fish and Game Commissioner Doug Vincent-Lang
NMFS Regional Administrator Dr. James Balsiger
North Pacific Fishery Management Council Chairman Simon Kinneen

APPENDIX X

Statement by David Croonquist

January 14, 2020

International Pacific Halibut Commission
2320 W Commodore Way,
Salmon Bay, Suite 300
Seattle, WA 98199-1287

Dear Commissioners:

The Pacific Halibut Convention between the United States and Canada was signed in 1923 to administer the commercial fisheries for halibut between both countries. It wasn't until 1973 that the first regulations governing the sport fishery were drafted. It is time to recognize that commercial fishing and recreational fishing need different management protocols. We believe the sport fleet halibut fishery should be managed separately from the commercial, Alaska subsistence, and tribal/First Nation fisheries.

The International Pacific Halibut Commission (IPHC) currently sets harvest poundage quotas for the various halibut fisheries in the waters off the US and Canadian coasts. Areas 2A (Southern US) and 2B (Canada) have assigned quotas that are divided between sport, commercial, and tribal fisheries. In 2019, the 2A sport quota was 605,675 lbs and the 2B sport fishery had 892,500 lbs. In Alaska, the charter fleet had a 2.71M lb quota and the private boat fleet had no quota and took an estimated 2.696M lbs. We believe it is time to re-structure the sport halibut fishery to be managed on an equitable basis for both countries. We feel that it can be done on numbers of fish landed, not pounds landed. This can be done with a standardized season of February 1 to December 31; a daily bag limit of one fish; a field possession limit of two fish; and an annual limit of up to six fish.

Recreational halibut anglers are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars which support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, fishing lodges, and tackle shops. Loss of halibut fishing opportunities can and is causing severe economic impacts to coastal communities in both countries.

A consistent season structure with a daily limit, a field possession limit, and an annual limit would have far reaching impacts not only for the coastal economies of our two countries but would also allow for a safer fishery. Assigned fishing dates have created a derby mentality, forcing anglers to go fishing when they shouldn't be on the water. Lives and property have been lost. First responders including the US and Canadian Coast Guard are put at risk when called out for search and rescue activities. Having an extended season would allow the sport angler to pick the days and sea/weather conditions for a safer fishery.

We would like to work with the IPHC, and the NPFMC, PFMC, and the Canadian DFO to establish regulations that would be consistent for the sport fishing communities of both countries starting with the 2019 season.

Sincerely,

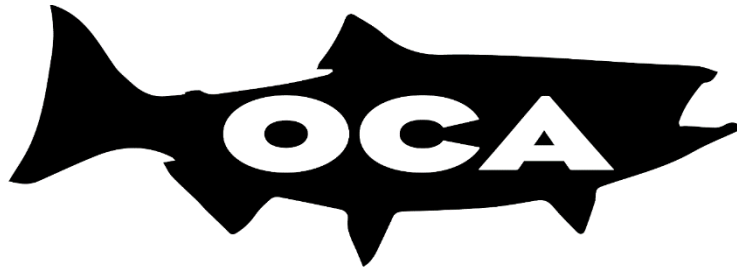
David A. Croonquist

Sequim, WA

For the Olympic Peninsula Salmon and Halibut Coalition, Port Angeles Salmon Club, Puget Sound Anglers, Coastal Conservation Association, City of Port Angeles, Port of Port Angeles, Clallam County Commissioners, Port of Port Townsend, halibut anglers from Oregon and California, and coastal businesses with direct and indirect links to the sport fishing community

[[back to Table 1](#)]

APPENDIX XI

Statement by Oregon Coast Anglers**Oregon Coast Anglers**

International Pacific Halibut Commission
2320 W Commodore Way, Salmon Bay, Suite 300
Seattle, WA 98199-1287

PO Box 584
Reedsport, OR 97467
January 16, 2020

Dear Commissioners

I am an avid angler who fishes salt and freshwater in Oregon. Since I moved to Oregon in 2007, I have pursued Halibut off the Oregon Coast. There is lots of room for improvement in Oregon's fishing regulations for Halibut. I am going on record as agreeing with and supporting David Croonquist's letter to you dated January 14, 2020.

Last year Oregon Department of Fish and Wildlife subjected anglers to the usual every other week Halibut fishing regulations for All-Depth spring and summer seasons. I've never cared for this type of regulatory process for ocean fishing, because it totally discounts ocean conditions. More than once, I have gone out fishing in inclement weather, because it was an "open" day, and more than once I've turned back. Halibut fishing is a major undertaking for those of us who fish out of Winchester Bay, as the Heceda Banks is a thirty five mile run into the Northwest swell and usual North wind chop. Ocean fishing has enough hazards without incenting anglers to take chances.

The on and off Halibut ODFW fishing regulations in 2019 resulted in season extensions and quota left on the table. Had ODFW allowed anglers to fish during calmer ocean conditions, I'm confident that the allowed Halibut quota would have been caught.

A major improvement in Oregon Halibut fishing regulations would be a defined season or seasons with quotas. Another improvement would be to allow bottom fish retention with Halibut. It's hard to justify a long run, lots of fuel expended, and expense to catch one Halibut.

Sincerely yours,

Steve Godin

Oregon Coast Anglers, President

[back to [Table 1](#)]

APPENDIX XII

Statement by Prince William Sound Charter Boat Association



2281 East Sun Mountain Ave, Ste B. Wasilla, Alaska 99686

January 24, 2020

IPHC
2320 West Commodore Way, Suite 300
Seattle, WA 98199-1287

To Whom It May Concern:

The PWSCBA, representing the Valdez and Whittier charter fleet, our customers, and local businesses request the IPHC take immediate action to recover the harvestable surplus of halibut in 3A. Survey data of sport caught halibut by both guided and unguided fisherman throughout the summer of 2018 indicates a serious problem in the spawning biomass of halibut in the Northern Gulf and Prince William Sound.

Total Halibut Surveyed: 689

Females 569

Males: 120

Females U29": 56 O29": 513 Largest 74"

Males U29": 93 O29": 27 Largest: 43"

The above survey data indicates serious problem with how we are currently managing the biomass for maximum sustained yield. We believe the survey data to be representation of the entire harvestable biomass and it indicates only a 17.4% male and 82.6% female ratio. 77.5% of the males harvested were under 29" and 8% of the females were U29. Current regulation to restrict retention of fish over 29" is leading to a depletion of male halibut. Until the IPHC can determine what is considered to be an adequate male to female ratio, we recommend measures be taken to restrict retention of any halibut under 29".

Additionally, The current discrimination in regulations between guided and unguided sport fishing sectors promotes legal and illegal resource squandering rather than conservation. Current management measures have created countless problems for enforcement and managers wasting

countless money and hours dealing with problems resulting from one large mistake and fixed with one simple solution. Politically, the pill will be hard to swallow, but it's the solution that fixes all of our problems. It's time to restrict all sport fisherman to a bag limit of one halibut per day with two in possession. This simple change, until there is a rebound in harvestable surplus is the best course of action to sustain the resource and continue to have an economically viable fishery.

The PWSCBA propose a motion to restrict the bag limit to one halibut per day /two in possession for all sport caught halibut within the state of Alaska when the TCEY falls below 2019 levels. During times of low abundance, we believe everyone should share the burden of conservation.

Finally, we also strongly support the Alaska Longline Fisherman's Association comments regarding the distribution of quota and urge the commission to not burden the 3A charter sector for political reasons.

Melvin B. Grove Jr.

President PWSCBA

[back to [Table 1](#)]

APPENDIX XIII**Statement by Larry Cobb****From:** Larry Cobb <captaincobb52@gmail.com>**Subject:** Halibut Regulation Question

Please explain what a reverse slot limit is? My idea of a slot limit is for example fish under 32 which is commercial legal we turn loose, Any fish that are between 32in and 60in we keep, anything over 60 in we turn loose, this way we keep only mature, prime healthy halibut. I know this will be hard to do but it's better than killing our babies and the big momma spawners. I think we should eliminate all derbies that target the largest halibut as the money winner. I really don't care to catch or even fish for a 26in halibut. I also think we need to give our Alaskan residents their fish back. Taking fish away from our residents and let any non-resident keep anything they catch just because they have their own boat is Ridiculous. Thank you for your time and consideration...Captain Larry Cobb Kings Run Charters

[back to [Table 1](#)]

APPENDIX XIV**Statement by Larry Carroll**

From: Kodiak Adventures Lodge <kodiakadventureslodge@gmail.com>

Subject: 2020 Halibut charter regs

Hello,

This email is in regards to NMFS inability to make fair and accurate allocation decisions.

After so many years of misinformation gathering regarding commercial catch sex ratio and NMFS claiming they have had accurate data throughout the years to make informed decisions as to allocation and total allowable catch. Now with the new study that shows the ratio of Female/ male commercial catch is way off of the previously used data.

Everything NMFS does in regards to allocation is now suspect !!!

The Charter fishing industry has taken the brunt of the reductions based on money and value to the state of Alaska.

What makes no sense to me is when there is a need to reduce the total allowable catch you would look to the charter industry for a large reduction. If the charter industry is only taking about 17% of the total and you reduce it by 10% that is really only a 1.7 % reduction in the total allowable catch.

Whereas if you reduce the commercial catch which is 83% by 10% it is a 8.3% reduction (all these are approximation % numbers) So it seems that if it is so important to make a reduction that it be made be the largest taker of the resource.

Also I would say that maybe the focus should really be on the bycatch and why that has never been SERIOUSLY addressed?

This should be the very first place a reduction or complete elimination should take place before any other reductions are implemented.

If more reductions are made to area 3C then this will have permanent and disastrous results to the charter business and the Alaskan economy. Many small towns and villages rely on the charter industry for a large portion of their economy. If more reductions are put in place the families that own charter boat and lodge will be forced to close. We already struggle with finding enough people to fish with the current restrictions. Most of us have had to spend more money on advertising / attending sport shows. We hear from many potential clients that there is already very little opportunity to catch fish/ halibut for the money spent.

Please take more time to reassess the total allowable take and who really should be cut if there needs to be further reductions.

Larry Carroll

Kodiak Adventures Lodge

www.kodiakadventureslodge.com

info@kodiakadventureslodge.com

[back to [Table 1](#)]

APPENDIX XVStatement by Steve Ranney

From: Steve Ranney <windnrain@yahoo.com>

Subject: 3A limitations 2020

Greetings;

As a long time member of BOTH the commercial fishing sector and the Charter industry I have been following with interest the management options for the upcoming season.

I hold commercial Quota in area 3A and have since the quota system started.

I hold CHP permits for area 3A and own 3 charter vessels.

First, the health of the halibut stocks for their long term viability has to be the most important management factor. Overfishing has been a significant factor in the decline of halibut abundance.

Second, as I hope you are aware, studies show a rapid decline in the halibut age/size ratio. Our halibut are significantly smaller. Whether this is due to fisheries or environmental factors it is a fact.

With the harvested halibut male/female sex ratio alarmingly high at approximately 90% for the commercial fisheries, I urge you to look at the minimum size limit for commercial fisherman of 32". The smaller halibut are males and if you are trying to increase the male percentage in the commercial catch, this needs to be adjusted. It is an arbitrary number put in place long, long ago and needs to be revisited.

I appreciate your consideration.

Sincerely,

Steve Ranney

[back to [Table 1](#)]

APPENDIX XVI**Statement by Luther Andersen****From:** kings@ptialaska.net <kings@ptialaska.net>**Subject:** 3A halibut restrictions

Hello,

My name is Luther Andersen, and my family owns and operates King of Kings guide service and lodge. We have fished the 3A waters of Cook Inlet since 1992. Each season I communicate with more and more people who do not want to travel to Alaska due to increasing restrictions. I could not agree more with the charter halibut committee's recent findings that our area could not survive a restriction below 1.588 m/lbs. The ripple effect throughout our community would be devastating.

Thank you for your time,

Luther Andersen

[back to [Table 1](#)]

APPENDIX XVII

Statement by Southeast Alaska Guides Organization

Southeast Alaska Guides Organization

January 31, 2020

International Pacific Halibut Commission
2320 West Commodore Way Ste 300
Seattle, WA 98119-1287

Re: 2020 IPHC Annual Meeting comments.

Dear Commissioners:

Southeast Alaska Guides Organization (SEAGO) represents the Area 2C recreational fishing industry which is highly dependent on guided angler opportunity to harvest Pacific halibut. That opportunity is disappearing.

2C guided angler limits have dropped from two halibut of any size per day, to one halibut per day 38" (96 cm) or smaller*. Given likely mortality choices for 2020, anglers may also face closures of all Wednesdays combined with a 3 or 4-fish annual limit to maintain a similar size fish. The average 2C charter halibut is now 9.6 pounds or 31" (79 cm)- an inch shorter than the legal retainable halibut in the directed commercial fishery.

Given our situation, we strongly urge the Commission to incorporate the following elements into the 2020 interim management procedure using a reference F46:

Add 2A and 2B mitigation above distributed mortality (coastwide TCEY).

We understand that the Commission is committed to a floor TCEY for area 2A, and a 70/30 distribution formula for 2B for the next 3 years. But we request that those additional amounts not be deducted from Alaska, but rest on top of Commissioner's final choice of coastwide TCEY. This conforms to discussion in the Management Strategy Advisory Board (MSAB) of allowing area specific policy bonuses to fall into a buffer zone between the reference fishing intensity, and an absolute maximum intensity (FMax).

Apply Slow Up/Fast Down to area TCEYs.

SUFD has been used in past Commission decisions to compensate for assessment inconsistencies, and to mitigate economic burden. F46 marks the conservative end of the range of fishing intensities considered useful, and leaves margin for applying the SUFD smoother.

Do not add a U26 adjustment for 2B.

Southeast Alaska Guides Organization 1600 Tongass Avenue, Ketchikan, AK 99901

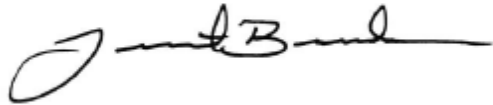
Canada has been given compensation for U.S. bycatch in the 70/30 distribution formula that lasts for 3 more years. Shifting additional fish away from Alaska toward 2B would continue to increase Canadian commercial and recreational limits at Alaska's expense with no rational basis.

Incorporating the above elements to the interim management procedure should result in an actual fishing intensity of F42. The MSAB considered both an F42 and F43 as a target reference during their October meeting, and adopted F43. According to the 2020 decision table, the probability that the spawning biomass is below B30 for 2021 is the same for fishing intensities from F42 through F46.

SEAGO feels these measures are a reasonable approach to fulfilling U.S. obligations to Canada and the West Coast, and supply bare minimum allocation to prevent further loss to already weak 2C guided angler limits.

(*the reverse slot also allows keeping fish 80" or greater, which are seldom encountered)

Respectfully,



Forrest Braden
Executive Director, SEAGO
forrest@seagoalaska.org

APPENDIX XVIIIStatement by Don Lane

From: Donald Lane <donlane71@gmail.com>

Subject: Informal Statement RE: FISS

I am concerned that IPHC will be getting to far from the "normal" FISS halibut survey parameters in one step. To me, the normal survey is a 10 mile grid from 20 fathoms out to 200 fathoms coast wide, generally. I began surveying in 2006 and until the beginning of the expansion surveys, IPHC pretty much stayed to those guidelines. One year we surveyed with 8 skate sets, did a lot of tagging, and a following year we were down to 5 skate sets. But still same general station guidelines. Then began the expansion program with 2019 a big year with over 1500 stations, caught a lot of fish, cost a lot of money, but was planned and well executed program. In 2017, which I would call the old pre-expansion normal, there were around 1364 stations.

Now I want to look at effort. If the stations were 5 skate sets, which I was told by survey staff was really the minimum to be effective for data, the 1364 stations would be 6815 skates set for the survey. I appreciate the desire to get down to 1000 stations but that is 7000 skates this coming year. The bid specs for 2020 call for 7 skate sets, which is 7000 skates set. Not a reduction of effort, an increase, with further inefficiencies per station fished, added to survey fleet by additional run times. Unless there is something else in play as a desired goal for the survey, the current 2020 bid specs could reduce data accuracy, increase costs per station, and catch more fish. Consider carefully any proposed changes to the FISS. As many know from past experience, the slightest changes to the FISS have created much dialogue and confusion.

In addition, I am uncomfortable with the Fed 15 bid closing as it seems little time for IPHC staff to make any changes to survey specs should the IPHC commissioners wish to make adjustments following Annual Meeting discussions in Anchorage.

From my view, traditional survey of around 1360s stations, 5 skates a station will be more efficient per station and accomplish better outcomes then the proposed 2020 specs. Look forward to discussions in Anchorage. Best Regards. Don Lane

[back to [Table 1](#)]

APPENDIX XIX

Statements by Diane and William Gentry

From: J-Dock Sportfishing <jdocksportfishing@gmail.com>

Subject: Help needed for the 3A Fishing Charter

To whom it may concern,

I am emailing you in regards to the paramount decisions being made that will have incredibly detrimental affects to the 3A sport fishing Charter fleet and in hopes that our words will have meaning to you.

My husband and I help manage and run a fishing company in Seward Alaska. The company was started by a man who gave his heart and soul to providing some of the best fishing experiences Alaska has to offer to customers from all over the world. Fishing and Hunting was his life. Unfortunately in October of 2016 he passed away. The family decided to keep the business going trusting my husband and I for sound advice, help in decision making, and education regarding the sport fishing in Seward. The reason I mention the above history is because not only did the owner eat, breathe, and live fishing in Alaska, but he also had a vision: a vision to give local teens and young adults an amazing summer income opportunity, a vision to expand business in Alaska, and a vision to improve the Seward economy by giving back and investing into its future. My husband and I hold those very same values.

Unfortunately for much of that vision to continue, we rely heavily on our bread and butter which is the halibut fishing. Our season is incredibly short from May until September (in a good weather summer.) And while I say that our season for fishing is only during that time, it doesn't hold a candle to how much work is put in during the off season: bookings, selling, sales shows, emails, phone calls, boat work, boat parts, boat upkeep, boat improvements, office improvements, boat prep, hiring, planning, etc. etc. etc. meaning that it is EXTREMELY difficult for charter business owners to have side jobs or other sources of income. We rely solely on our summer bookings and the income they bring in.

Summer fishing income has become rocky during the past 5 years since the elimination of all Wednesdays and the enactment of 5, then 4 max halibut a season. It also faltered when we were changed from 2 fish of any size to 1 fish of any size and 1 under 28". But the charter industry rolled with the punches and said "this too shall pass." Every year it seems like right when we are adapting and getting used to the changes, something else comes out that we are going to have to have our wrists slapped again... Now there are rumors that we are to have Tuesday's, Wednesday's and Thursday's eliminated for halibut fishing, a slot limit, or the possibility of eliminating or reducing the size of the second fish. I cannot begin to tell you how much this will affect our business and how many small operators will probably end up going out of business.

Our company owns 4 boats and leases a 5th. Taking away all Tuesday's will cost us around \$180,000 (revenue - NOT income) and that's just if one of those days is taken away. You are probably saying to yourself that \$180,000 isn't that much money in the grand scheme of things however to a small business, where one of our boats back up engines cost \$40,000 it is a tremendous amount of money to us.

Not only do I believe it will affect the sport fishing industry but you must also think about the town itself and the small businesses. Yes the cruise ships full of 75 year olds will continue to come and infiltrate the town every Sunday, Tuesday, and Thursday but are those tourists staying the night? Are they eating in the restaurants? Are they staying and playing in the town and supporting the local activities? Not likely.

My husband and I, our owners (a mother and her son and daughter who help run the business now and absolutely LOVE it), my other 4 captains, my 10 deckhands, my 3 office employees, and our 20 employees at the Seafood market are begging that you put the time, energy, thoughtfulness, and depth into this decision as if it were your business, if it were your family, and if it were your community whose livelihood depended on it.

With much respect,

Diane Gentry

From: William Gentry <nobleeagleinc@gmail.com>

Subject: Concerned charter captain

To whom it may concern,

My name is William Gentry and I am a 34 year old charter captain from Seward. My life's purpose is the dedication to halibut fishing and preservation in Seward Alaska. During the last 20 years of my life I've been sharing this passion with thousands of anglers from all over the world. My career started at age 16 when I became a deckhand and then a captain at 19. When I was 21 I formed and operated my first charter company, Glacier Fishing Charter. I was an owner operator of that company for 8 years. Then, due to concerns about the future of the industry, I decided to sell my boat in 2014. The summer of 2015 I went to work for my late mentor Kamell Allaway, owner of Jdock Sportfishing. His dream was to share the beauty of the North Gulf with people from all walks of life.

After his passing in 2016, my wife and I took over some portions of management of the company and invested our life savings to see his dream continued. Not only have we invested ourselves 100% into the business, we have also decided to invest permanently in Seward and Alaska. We are currently building a home here and moving up full time in April. I live here full time now while she finishes nursing school and can join me in the spring. We plan to raise a family here as long as charter fishing provides a viable income for our family.

The reason for this email is that I have deepening concerns about the proposed regulations for the 3A Charter fleet. These regulations will further limit charter operators to fulfill life long dreams that many Americans have of fishing for halibut in the beautiful Alaskan ports scattered throughout the north gulf coast. Not only will these decisions crush thousands of American's dreams, but the research shows that the economic impact will be catastrophic to our small coastal towns. The sport fishing industry is a major part of the economic drivers in our communities boosting business for all small businesses including lodging, entertainment, food/drink, and travel/tourism. Regulations reducing the number of days that retention of halibut is allowed would cause the greatest economic damage. This proposed change to the industry will severely impact the sport fishing companies revenue, drastically depleting the income and making it more and more difficult to be able to stay in business.

Secondly, restricting anglers to one fish or a reverse slot limit would further decrease the possibility for anglers to fulfill their Alaskan fishing dreams. I'm hopeful that you listen to our pleas and consider the facts. Further restrictions on halibut sport fishing would cause enormous economic impact to the Alaskan towns and evaporate the dreams of people all over the world.

Lastly, it is too late in the year for drastic changes to be made without causing enormous damage to the businesses. Most anglers that consider Alaska for their fishing vacation have already booked their fishing trip a

year out as well as their airline tickets, lodging accommodations, rental cars, fishing licenses, and more. To make these decisions in February while drastically changing the fishing days/halibut sizes, is completely unethical towards our operations. These changes will cost large amounts of money state wide, not to mention cancellations, booking changes, upset customers, ruined vacation plans, and credit card fees associated with refunds that we will have to incur.

Please help us keep this sport fishing industry one for the books and the attraction to those anglers and tourists who live and dream of coming to Alaska one day to catch a halibut.

Sincerely,

Captain William D. Gentry

Jdock Sportfishing

[back to [Table 1](#)]

APPENDIX XX

Statement by Timothy Cashman

Name Timothy Cashman

E-mail akcoastalmarine@gmail.com

Subject Charter Halibut Allocation

Message I own Alaska Coastal Marine and Rainbow Tours in Homer Alaska. We have been in the Halibut charter business since 1988 and we directly employ over 25 local Alaskans. The allocation cuts we have faced since the implementation of the CSP have been very difficult on our business and our employees. If we have to make dramatically deeper cuts in 2020 it would certainly be devastating to our business and employees. We all understand the situation with the biomass, bycatch, and the need for conservation among all user groups to protect this valuable resource into the future. We are asking for and would support the following for the 2020 season: Begin at F46SPR then make concessions to get to F43SPR. We realize this would still be a 10.3% reduction and put the 3A charter fleet down to 1.7 million pounds. This is a good compromise and would allow us and most other charter operators to survive another year while protecting this resource. The charter sector would still face significant and difficult cuts but it would not be the death blow that is currently an option on the table. Respectfully Submitted. Timothy J. Cashman Soldotna/Homer

[back to [Table 1](#)]

APPENDIX XXI**Statement by Clive Stevens****From:** Clive Stevens <cr01stevens@gmail.com>**Subject:** Halibut Regulations

As an individual that deeply cares about having the ability to enjoy the amazing fishing experiences in Alaska, I am writing to inform you why it is imperative to support fair halibut limits for the 3A area.

My wife and I and often an friend have visited Alaska 5 times now. Just to experience the great fishing opportunities that Alaska has to offer. We travel a long way and invest thousands of dollars each for the privilege of doing that, and I do mean privilege. We get to experience your great state, meet some of it's people, fish with family charter operators who have contributed to making Alaska and have the opportunity to fish and harvest some fish to take home.

We respect and follow the rules and regulations that govern how we fish and how much we are allowed to keep. We choose Lodges and charter operators who are honest, law abiding and are the true protectors of the natural resources we travel to experience. We have seen limits change over the years, but the drastic changes in regulations that are being discussed could very well impact how or IF we visit. Many of us have seen the reality of these restrictions - drive through any of the south peninsula communities and see how charters have closed, local tourist infused businesses have shut their doors, and villages and towns are not thriving, but floundering. Please take into account that further harsh restrictions could impact us as consumers in a way that negatively effects Alaskan tourism. Any further drastic cuts to limits would be devastating to all of the charters, lodges, and processors on the Kenai Peninsula and Kodiak Island- as well as those other businesses that depend on the people and capital these fishing experiences draw into the great state of Alaska. .

Clive Stevens

125 Elderbrook Lane, Sacramento, Ca, 95828

[back to [Table 1](#)]

APPENDIX XXII**Statement by Seth Mosley****From:** Seth Mosley <seth.mosley@mosleymaritime.com>**Subject:** Alaska Halibut Regulations

To whom it may concern:

As an individual that deeply cares about having the ability to enjoy the amazing fishing experiences in Alaska, I am writing to inform you why it is imperative to support fair halibut limits for the 3A area. Many of us have visited Alaska or paid for charters to enjoy fishing that is a True Alaskan experience. We have seen limits change over the years, but the drastic changes in regulations that are being discussed could very well impact how or if we visit. Many of us have seen the reality of these restrictions - drive through any of the south peninsula communities and see how charters have closed, local tourist infused businesses have shut their doors, and villages and towns are not thriving, but floundering. Please take into account that further harsh restrictions could impact us as consumers in a way that negatively effects Alaskan tourism. Any further drastic cuts to limits would be devastating to all of the charters, lodges, and processors on the Kenai Peninsula and Kodiak Island- as well as those other businesses that depend on the people and capital these fishing experiences draw into the great state of Alaska.

In addition, I am from the gulf coast where our town of Orange Beach, AL has seen fishing regulations cripple the charter and recreational fishing community. Red snapper fishing is essential to our fishing community here and over the years, restrictions and more federal regulation have caused charter businesses to shut down or raise their prices for other types of trips to a point they aren't getting customers. The recreational/private fishermen are selling their boats and gear, thus impacting marinas, bait shops and more. I personally believe this has even lead to an increase in illegal fishing with catches not being reported, multiple trips per day harvesting excessive quota, and size limits being ignored. Please don't do to your people and economy what they've done to us. Things have finally seemed to turn around down here and are moving in the right direction again thanks to emails like these, public advisory boards, and action groups in the charter and private sectors. Conduct additional and unbiased studies and gather more information, don't cripple local businesses and watch charter captains close their doors because they can't sell trips, I have personally witnessed it happen in my own backyard, it is depressing and it takes years to rebound. Listen to the ones on the front lines, they care about conservation just as much or more as the ones behind a desk or computer because that is their livelihood and the livelihood of their children. My dad and I came to Alaska in 2019 for a week long trip, it was by far the most enjoyable fishing trip I've been on. I would really love to come back to your beautiful state with him and my son again one day on another fishing trip; so please ensure our fishing guides can make our trip worth it by giving us the opportunity to catch the fish that make it such a great experience.

Thank you for your time,

Seth A. Mosley

[back to [Table 1](#)]

APPENDIX XXIIIStatement by Brenda Swann

From: Brenda Swann <brenda@usamednet.com>

Subject: Fishery

To whom it may concern:

As an individual that deeply cares about having the ability to enjoy the amazing fishing experiences in Alaska, I am writing to inform you why it is imperative to support fair halibut limits for the 3A area. Many of us have visited Alaska or paid for charters to enjoy fishing that is a True Alaskan experience. We have seen limits change over the years, but the drastic changes in regulations that are being discussed could very well impact how or if we visit. Many of us have seen the reality of these restrictions - drive through any of the south peninsula communities and see how charters have closed, local tourist infused businesses have shut their doors, and villages and towns are not thriving, but floundering. Please take into account that further harsh restrictions could impact us as consumers in a way that negatively effects Alaskan tourism. Any further drastic cuts to limits would be devastating to all of the charters, lodges, and processors on the Kenai Peninsula and Kodiak Island- as well as those other businesses that depend on the people and capital these fishing experiences draw into the great state of Alaska.

Brenda Swann

[back to [Table 1](#)]

APPENDIX XXIVStatement by David Ardinger

From: David Ardinger <gofishingkodiak@gmail.com>

Subject: Halibut 2020

Hello,

I've been in the charter boat business since 1991 in Kodiak Ak. As it stands today any person with a sports fishing license can catch two halibut any size every day no annual limit regardless of their residency. As it stands today on a charter boat in Alaska, there is a four fish annual limit, two halibut per day, one under 28 inches and one any size. To make things fair across the board for everyone all the same rules should apply to ALL sports fisherman including those on charter boats!!!! Problem solved! We are essentially "bus drivers" for sports fisherman. Doing so would take out the guys doing it illegally and make enforcement easier . Raising the bycatch is gross negligence!! How you people sleep at night is beyond me.

Captain Dave

[back to [Table 1](#)]

APPENDIX XXVStatement by Kamell Allaway

1 February 2020

To Whom It May Concern,

My name is Kamell Allaway III and I'm writing in regards to the proposed changes for the Area 3A Charter Halibut Fisheries.

I'm the co-owner of a fishing charter and seafood company in Seward, Alaska, operating a business alongside my mom, Diana Allaway, my sister, Kristyn Allaway, our partners Will & Diane Gentry, and a long list of passionate employees.

Our family has invested all of our money, time, and energy into running our company ever since my father, Kamell Allaway II, passed away in 2016. Prior to us taking over, my father also invested all of his money, time, and energy into building a business that made thousands of dreams come true. Providing this experience was a dream of his own.

Three years after his passing, the entire family of our company continues to devote everything we have in order to carry on his vision

Unfortunately, our company relies on the halibut fishery in order to provide this experience of a lifetime. It's the primary draw for our clientele. Not only do our clients rely on the halibut fishery, but so do our employees. We have over 40 employees whose livelihood depends on the success of our business, especially our captains and crew. Our partners, Will and Diane Gentry, have intentions of raising a family in Seward, while currently building their second home alongside Resurrection Bay. Many of our employees have similar intentions of growing their families and careers in Seward, but none of this will be possible if the halibut regulations expand.

If all Tuesdays, Wednesdays, and Thursdays are taken away, we'll inevitably see a decline in our fishing clientele as well as a decline in interest towards the Seward fishing industry. Revenue will drop tremendously. Employees will lose income. And most charter companies will go out of business. Guaranteed. Our company will become unsustainable, forcing us to let go of many employees, or worse, close our doors. We're talking a loss of hundreds of thousands of dollars, which is just not possible for our company to endure.

Even more so, to make such drastic changes only months before our season would radically impact our operation. Almost 80% of our clientele has already booked their fishing trips, flights, lodging, licenses, etc. Not only would we lose a significant amount of revenue as a company, but many tourists and anglers will incur astronomical losses to such sudden changes. To be frank, pulling the rug out from under so many people may not be possible to recover from.

Our fishing company is a family. To lose something that we love so much would be detrimental to say the least. I just ask for you to consider the lives invested in this industry and the inevitable effects your decisions will make on a community.

Thank you so much for your time, attention, and consideration to my plea.

With much respect,

Kamell Allaway III

A handwritten signature in black ink, appearing to read "Kamell Allaway III". The signature is written in a cursive style with a prominent initial 'K'.

[back to [Table 1](#)]

APPENDIX XXVI**Statement by Aaron Mahoney****From:** Aaron Mahoney <fishaaronak@gmail.com>**Subject:** For your review

We are asking for an F46 SPR it would equate to a 10.3% reduction in area 3A's allocation, a 10.3% reduction would give us an allocation of 1.7 million pounds. This is a good compromise. This is only equitable until the CSP review in 2021. There is little future left for our businesses and children in the halibut industry. The science is garbage. I could have told the commission 20 years ago we were harvesting mostly females.

- F46 starting point provides a consistent methodology for base apportionment to all areas until final apportionment negotiated in 2021
 - Honors 2019 2A/2B agreement but accounts for 2A/2B bonus TCEY as additional mortality until final apportionment negotiated in 2021
 - Final coastwide TCEY equates to a F43 SPR which is consistent with MSAB recommendations
 - No U26 adjustment in 2020 consistent with NPFMC, ADF&G, & stakeholder comments, and provides opportunity for negotiations in final apportionment discussions in 2021
 - SUFD follows precedent for smoothing year to year TCEY change to mitigate survey error
 - 2B agreement to use 70% historic share provides survey smoothing so SUFD not needed in 2B
 - Resulting FCEY's likely sufficient for 2C & 3A charter minimum needs
- If 3 year average bycatch is used, 4CDE FCEY is 1.6 mlbs which may also be sufficient for minimum needs

It is time the prejudiced regulating ends. If not the status Quo for 3A, please consider F46 until the CSP review in 2021.

Alaska Gulf Coast Expeditions

PO box 39416

Ninilchik, AK 99639

(907) 398-0259

www.alaskagulfcoastexpeditions.com

[back to [Table 1](#)]

APPENDIX XXVIIStatement by Kristyn Allaway

From: Kristyn Allaway <kristynallaway@yahoo.com>

Subject: Halibut regulations

To whom it may concern

I am writing this letter because I fear the outcome of potential regulations for area 3A charter halibut fisheries.

My father, a man who lived for this industry, raised me on the docks of Seward, Alaska. Unfortunately when I was just 19 years old he passed away. Amidst the shock and grieving, one thing was simple, we would carry on the business in his honor. For him and for all of us involved because it's not just a job, it's our livelihood.

My mom, my brother, and I have so much financial and emotional investment in this industry. We value sustainability and the folks like yourself involved in the longevity of our fisheries. We ask you to think broadly, last season the commercial halibut catch consumed about 75% of Alaska's over all quota. There is enough to go around. Commercial and charter can coexist in harmony as long as the regulations don't expand.

If the potential regulations put forth for season 2020 fall into place there is no adjusting. Companies will go out of business, small fishing towns will lose their tourist appeal, companies outside of the fishing industry will be effected, and most of all families will be left devastated. Majority of our boats for 2020 are already booked. Clients have arranged airfare and stay. If these regulation proceed it will take a dramatic adjustment to attempt a partial recovery.

The Halibut fishery is the backbone to our company. I plead with you to consider the community and the industry at risk here. We simply ask that 2019 regulations see through to 2020. That we open the discussion for 2021 regulations now. Companies will have the appropriate time to adjust and the people effected are given the opportunity to be heard.

Thank you for your time and consideration

Sincerely
Kristyn Allaway

[back to [Table 1](#)]

APPENDIX XXVIIIStatement by Griffin Woodall

From: Griffin Woodall <griff_n87@yahoo.com>

Subject: Halibut regulations and livelihood

Hello,

My name is Robert Woodall. I am the captain of the fishing vessel Tail Watcher based out of Seward, AK. During the last several years of my career sportfishing out of Seward, stricter regulations of the fishery have always been a fear and an ever looming presence within the sport fishing community. When the regulations took away the ability for captain and crew to retain halibut, it was understood. It was sensible. At one point we had the ability to take people fishing for two halibut of any size till it was switched to one of any size and one under 28 inches. that hurt, but it was understood. People could still come fishing on a 12 passenger vessel and have true hope and aspirations to catch the fish of a lifetime, and that could mean any fish from 10 pounds to as big as someones imagination allowed. The next year several Thursdays were set aside to relieve the halibut from over pressure, running fewer trips wasn't ideal, but in this industry days off can be a luxury that we so rarely get to enjoy, it was understood. In the last couple years we have gone from Thursdays to Wednesdays, to Wednesdays and some Tuesdays, and we have grown accustomed to and adapted to not halibut fishing two days a week. Not everyday do we have the time to fish for all species, and non halibut days gives our clients the chance to catch salmon, ling cod, and rockfish and it can be a good day of fishing for the crew to have a little less pressure and have a little fun targeting some different species. All these regulations have changed the sportfishing industry entirely, but it has been the understanding that it would be a sacrifice for the better, and it was the right thing to do for the fishery. However, we are staring straight down the throat of the beast that is over regulation, and we are potentially about to be asked to sacrifice much more, and in my opinion, far too much. Giving up days, and an extra fish of any size has been endurable, because our clients have still been able to have the pre trip excitement knowing that they have the chance to catch a fish of ANY size. There are few things more heart warming than seeing a grown man act like he is a 7 year old kid about to go to disney world for the first time. When he catches that fish, that brings the rumors, legends, and dreams to fruition, there are few places in the world where true happiness like that can be found.

Best case scenario, we stick to the status quo, and we as sportfishermen can continue to bring tourists to the state to chase dreams and make memories. Worst case scenario we lose more days to fish for halibut, we lose the ability to make a dream of ANY size come true. I fear that the potential regulations will lead not only to the loss of dreams made true, but to the loss of paying fishermen and tourists alike. These people that I take fishing bring their families, their friends, their coworkers, etc. Not all these people that travel together all come fishing with me, often group members stay in Seward, they shop, they eat, they spend their money on different tours and the Alaskan experience. Losing paying charter customers to over regulation not only will be detrimental to my own livelihood, but also to many other industries in the state. I love my job, few people are blessed enough to say that. I hope to whoever is reading this can say the same thing. I hope you don't have to know the feeling of potentially losing what gets you out of bed in the morning, what makes you feel like a difference maker in peoples lives, what puts food on the table for you and your family. I hope your dreams of ANY size continue to come true, because growing up as a kid in Montana wanting to get paid to fish, mine have. I don't know what would happen if that was to be taken away from me.

Sincerely,

Captain Robert Woodall

[back to [Table 1](#)]

APPENDIX XXIX**Statement by Dan Spies****From:** bigdansfishing@gmail.com <bigdansfishing@gmail.com>**Subject:** Concerned citizen**To:** IPHC

I am writing you today as a concerned Charter Captain as well as a business owner. I currently own 2 fishing vessels which I charter out of Homer, Alaska in the 3A area. My wife and I also run a lodge in Soldotna, Alaska as well as own a general construction company building residential homes.

Last season the 3A area had a 4 fish annual limit, 2 per day, one any size and one under 28" with 6 Tuesdays and all Wednesdays closed. This seasons proposal will allow the 3A Charter operators a continued 4 fish annual limit, one any size and one under 26" with ALL Tuesdays and ALL Wednesdays closed.

These recommendations follow the Alaska Longline Fisherman's Associations recommendations very closely. Asking for an F46 SPR, but willing to concede down to an F43 SPR of 1.7 million pounds. This equates to a 10.3% reduction in area 3A's allocation.

In recent documentation from NOAA Fisheries economists, in the 2019 NOAA "Alaska's Valuable Recreational Fishing Industry/NOAA Fisheries" article, the 1.9 million pounds cut in 2016 has had a negative effect on local economies. There was an \$85 million dollar decline which is huge for the rural Alaskan communities in this 3A area. We are seeing a rapid increase in charter operators closing their doors as well as other local businesses. Those businesses, who make their operating capital based on the amount of funds generated by a robust charter fishing industry, closed their doors. The usually popular launch sites at Deep Creek and Anchor Point, with charter boats, barely remain profitable. To lose even more quota from the charter industry will affect more businesses than just those that are listed above. Convenient stores, retail stores, restaurants, hotels/motels/lodges/bed-and-breakfasts, fuel stations, and tour guiding industries will all be affected. Many have lost income and are barely able to stay open due to the last cuts on the charter industry.

These changes have affected me in more ways than one. Last year alone I took a loss of \$40,000. This year with the proposed changes, and also being notified this late in the prime booking season, I could take a loss of \$80,000 if not more. The inconsistency has made managing businesses difficult since we don't know what is going to happen until the booking season has started. As a citizen and a business owner on the Kenai Peninsula, I provide employment, housing, as well as sales tax income for the borough. All of these are important assets to help contribute to this amazing state. Losing businesses that help contribute to taxes and bring people to the area are affected, but so is the desire to move into this area. The Kenai Peninsula in particular, is a tourist driven community. The Kenai Peninsula may no longer be a desired vacation destination if there aren't businesses for them to have access to. Our community is already suffering from the current changes that have occurred.

I am asking you to do the right thing and implement the recommendations addressed in this letter or keep it as status quo.

Thank you, Dan Spies

Concerned business owner and private individual

[back to [Table 1](#)]

APPENDIX XXXStatement by DeAnn Luloff

From: DeAnn Luloff <luloff2@icloud.com>

Subject: Halibut fishing

To whom it may concern:

As an individual that deeply cares about having the ability to enjoy the amazing fishing experiences in Alaska, I am writing to inform you why it is imperative to support fair halibut limits for the 3A area. Many of us have visited Alaska or paid for charters to enjoy fishing that is a True Alaskan experience. We have seen limits change over the years, but the drastic changes in regulations that are being discussed could very well impact how or if we visit. Many of us have seen the reality of these restrictions - drive through any of the south peninsula communities and see how charters have closed, local tourist infused businesses have shut their doors, and villages and towns are not thriving, but floundering. Please take into account that further harsh restrictions could impact us as consumers in a way that negatively effects Alaskan tourism. Any further drastic cuts to limits would be devastating to all of the charters, lodges, and processors on the Kenai Peninsula and Kodiak Island- as well as those other businesses that depend on the people and capital these fishing experiences draw into the great state of Alaska.

We had the awesome opportunity to visit and fish last year for the first time. We have already booked for 2021 but with all the pending changes it may not be a possibility. Please don't take that away. You have so much to offer it would be a shame for you to take that away from your visitors.

I support the Homer Charter Boat Association's Proposal for 2020!

Sincerely,
DeAnn Luloff

[back to [Table 1](#)]

APPENDIX XXXI**Statement by Sean Prendergast****From:** Sean Prendergast <maritimeconsultantsintl@gmail.com>**Subject:** Economic Impact of Sport Caught Halibut Restrictions

To Whom It May Concern:

I write pertaining to the proposed halibut regulations for the 2020 halibut fishing season. I own a marine systems engineering and service company based out of Seward, Alaska and wish to elucidate upon the impact the proposed sanctions will serve upon the marine trades.

As a business, over the past 5 years, our business averaged 38% of our gross income from the Seward, Alaska charter boat fleets. This includes rewiring and troubleshooting electrical systems, maintaining and repairing generators and main engines, and installing new electronics packages. The mean gross over the past 5 years was \$86,622.80 per year. The boats run a hard 100 days per season and we take great pride in successfully supporting this diligent fleet.

The mean five year material cost was 41% of the gross revenue. Thus, the materials we purchased to service the Seward fleet each year averaged \$35,515.39 per year. Those materials were purchased exclusively from local Seward businesses. Over the past five years, that amounts to \$177,576.74 pumped into the local Seward retail economy, thanks solely to the Seward halibut charter fishing fleet. This does not include the fuel and insurance for our vehicles, and other peripheral economic contributions to the local economy. A reasonable estimate is that our small business alone has contributed a quarter million dollars to the Seward economy thanks ONLY to the Seward halibut charter fishing fleet. We are a very small fish.

If the proposed species sanctions are imposed, this will not only devastate the charter fishing fleet, disappoint the thousands of vital tourists from the lower 48 who have planned trips at least a year in advance to target sport caught halibut, but also negatively impact the trades and retail industry that support this unique fishery. Thanks to a healthy, busy charter fleet, a quarter million dollars came to the small town of Seward only through one very small business. This does not include the welders, mechanics, boat yards, and ship carpenters that service the fleet as well.

These sudden sanctions seem reckless on the part of the IPHC, like more of a reaction than a thoughtful response. And they also beg the question - is the IPHC against promoting Alaska small businesses and skilled trades?

As a representative of the skilled trades, I feel F46 SPR is a fecund interim solution to maintaining the integrity of sustainability in this gilded species.

With Proleptic Concern,

Sean Prendergast

Maritime Consultants International, Seward, Alaska

[back to [Table 1](#)]

APPENDIX XXXII**Statement by Raymond Nix**

To the Commissioners,

My name is Raymond Nix and I am an owner operator of Crazy Rays Adventures, a saltwater fishing company based out of Whittier, Alaska in management area 3A. I am a life-long Alaskan and have been fishing the waters of Southcentral Alaska my entire life. It is my purpose in this letter to inform the commissioners of my position on the upcoming regulation changes to our area. As the commissioners well know, the area 3A sport charter fishery has taken a steady reduction in allocation since the removal of the accepted GHM and inception of the CSP in 2014. We have watched as our fishery has shrunk from 3.6 million pounds (2012) to a proposed target of around 1.2 million pounds (2020). This would put us at roughly a 75% reduction in allocation over an 8 year period. If we are forced into a reverse slot limit and further days of the week closures, I fear we will be at a point of no return so to speak. My company alone will see an \$80,000.00 reduction in gross sales from the additional Tuesdays lost. This is only a fraction of what the economic impact to our community will be. Whittier is a small rural community and less days available for generating revenue during our busiest time of year is going to be detrimental to my personal company, and several other small businesses in our town. As some of you may already know several of us coastal community business's, already have 75% of our reservations for the core of our 2020 season. Drastic changes to regulations have been, and will be, extremely harmful to our industry and our communities.

When the commissioners move to finalize the management plan for 2020, I'd ask that they consider the following the ACA and ALFA are proposing, as it is the most reasonable step towards a solution for this year. Align with the F46.

For our area in 3A this would look like all Tuesdays and Wednesdays closed and a reduction in the size of the second fish to 26" or less. 2 fish per day and a 4 fish annual limit. We would be taking a 10.3% reduction in allocation for 3A as a whole.

I'd like to conclude with this. Please take into consideration, future regulation changes based on a multiple year average with smoothing as the aforementioned proposal lays out. It is extremely difficult having a large number of people change their hotel reservations, car rentals, air fare and other tourism based events, after they have already been booked. It is not only extremely costly to everyone involved, but quite possibly not necessary to meet conservation reasons as well.

Thank you for your time,

Captain: Raymond Nix

Owner/Operator Crazy Rays Adventures LLC

[back to [Table 1](#)]

APPENDIX XXXIII

Statement by Gerri Martin

To Whom it May Concern,

As owner of North Country Halibut Charters in Homer for 40 years now, I have very grave concerns about the potential reduction proposed for the 2020 Halibut Charter 3A quota. This huge reduction will have devastating effects on our industry.

Area 3A has been an easy target. We have no more to give before our industry starts failing. We were forced into a limited entry fishery. We can no longer take two trips a day. We have size limits on our fish, *one of which is hardly worth keeping*. Our crew cannot retain any halibut. We have lost one day a week all season and another 7 days during the peak of our season. We have a seasonal limit of four halibut. *You can keep more king salmon annually than you can halibut at this point* .

Trying to keep up with these cuts is hard on a business such as ours. Our season is short, our clients are uncertain what to expect and they continue to voice their disappointment, saying it's hardly worth coming to fish any longer. Those trying to make plans for this coming summer do not know what the restrictions will be. With the yearly restrictions, the clients know the season is shorter and they try to book earlier all the time to get the dates they want... but how do we sell them a trip when we do not even know what the regulations will be? We are currently in the busiest winter months of our booking season. I have tried to be very conservative in what I am making available to my clients, but even at that... I could have some very unhappy clients once the hammer comes down this month. The timing of the regulatory decisions and changes are untenable.

Resource management and the politics of management are very complicated. It is not easy for us to understand how the decisions are made and likewise I am sure the decisions being made are not easy. But what we absolutely need for our industry is stability and that has been hard to come by the last many years.

We need to get back some quota that was reallocated from 3A to other management sectors. Taking quota from one area of stakeholders and giving it to another area of stakeholders is unacceptable. Having this very valuable fishery reallocated back to 3A would save our industry from being gutted.

I urge you to consider F46 SPR or keep us at Status Quo TCEY. Thank you for your serious attention to this issue.

Sincerely,
Gerri Martin
North Country Charters

[[back to Table 1](#)]

APPENDIX XXXIVStatement by Mel Erickson

From: Capt. Mel Erickson <gamefish@alaska.net>

Subject: 3A guided halibut regulatios

Dear Commissioners

I have been guiding anglers for halibut for 32 years, in Cook Inlet, off the beach in Ninilchik and Anchor Point, The Catch Share plan is ridiculous & the way the IPHC has been managing the guided sport fishery since the implementation of the CSP is just plain crazy and does not work in a sport fishery. for one you issue our allocation in pounds then regulate us in numbers of fish, this has to change , give us our allocation in numbers of fish and then don't worry about size. A dead fish is a dead fish and what difference does it make if we kill a 8 pounder or a 50 pounder, killing a 8 pounder and saving 42 pounds does not make more fish in the sea to give to the long liners, there is no extra fish in the sea to give to the long liner.

over the last several years the charter fleet and reduced and saved hundreds of thousands of fish but we get no credit for those savings because our average poundage goes up, that brings up another point it is a well know fact that halibut size at age class is getting smaller so how do you explain that our average size is up, Let me explain to you why.it;s because your yearly changes in sport regs has changed angler behavior and also guide behavior.

I can tell you from my boat and catches when i go target bigger fish and only harvest 6 fish for 6 anglers, my total weight is about 200-300 pounds of live fish, when i have to stay in shallow due to weather or tides my boat harvests 12 fish for 6 people for a total weight of about 100-125 pounds, so what do you want saving weight? or saving fish?

How does killing 12 smaller fish instead of 6 larger fish save fish and and help the fish stocks?

another factor fish managers don't seem to understand is that Alaska is a destination fishery, & many people plan 1-2 years out with airline, hotel car rental and tour and fishing reservations, not to mention vacation time off work, many are on a one time dream vacation. & then the halibut commision comes in and closes days that people are already book on. February as way to late in the booking season to be closing days, and is very unfair to all these people, not to mention the guides, this upsets the apple cart for many businesses, than just the guides.

The guided angler and the guides need stability in regs and not changes year after year late in the game in february. i have been taking calls and emails for months plus deposits for trips and i can't even tell the people what days are open or closed to fishing. let alone what the daily limits will be. this madness has to stop, cant you see after several years into this CSP that it does not work with the guided sport fishery, You simply can't manage the sport fishery like the commercial fishery.

The consistent changes every year . erodes and reduces demand for our product, and its getting to the point we don't have a product to sell that people want to buy, and then another huge blow is we can't operate enough days of the week between closures and weather days to get enough trips in to be profitable.

you have not placed any regulations on the long line fleet to reduce demand for their product, that may have less product to sell but their demand remains high and thier prices go up softening the economic hit to them.

Many business rely on the guided fishery and we rely on them, many businesses are closing due to federal overreach and mismanagement, the ninilchik general store been around for 30 years just closed, Ninilchick used to be a nbooming town in the summer now it is a ghost town.

The anchor river inn is another one, and i know for a fact that the 2 tractor launches at deep creek and anchor point have seen a huge reduction in daily and yearly launches, and if any more restrictions or days taken away they will close down and a service that had been operating for 30 years for both guided and unguided boats will close and that will be devastating.

oh yeah and i forgot to mention that with the switch from the GHL to the CSP the guided anglers lost 1 million pounds of allocation, stolen from them.

so in closing i recommend a regulation freeze on the charter fleet and guided angler and keep the 2019 rules in place until the CSP can be renegotiated in 2021.

I also am opposed to any transfer of fish from the USA to Canada.

I also would suggest a new approach in the future for guided angler management.

what we need is a 7 day a week fishery, if we need to fish less days then give us starts lets say 6 starts per week. and make the daily bag limit 1 big fish or 2 smaller fish, such as 1 fish over 34 inches, or 2 fish 34 inches or less, this is a no brainer, it saves fish and it saves pounds, it gives charters the ability to sell a 2 fish limit, and it also gives the angler an opportunity to harvest a big fish. plus no seasonal limit.

Managed in pounds the Charter fleet needs a bare minimum of 2 million pounds, if you look at every year since the CSP implemented we have averaged about 2 million pounds each season regardless of the rules implemented each year.

Better yet just change the method to maange us in numbers of fish and dont worry about pounds, lets say currently a minimum of 150,000 fish in 3A

one last point i want to make is with all these restrictions on the guided fishery the recorded harvest has gone down, but in reality many of those fish have not been saved that just get recorded now in the unguided statistics as many anglers just go with friends or family with boats or buy their own boat, even the crew fish really hasn't been saved because instead of harvesting their person fish on charters like before they just go out on days off with friends and family and harvest fish as non -guided fish.

Oh yeah and the RQE in my opinion wont work and wont change the ridiculous management of not knowing the regs each year until february, the concept of the RQE looks good but reality its to little to late, it would take years to buy back enough fish to get us back to where we were before the CSP. not to mention their is no guarantee that the charter fleet the buyer could find a willing seller with the TAC so low.

Thanks Mel Erickson

[back to [Table 1](#)]

APPENDIX XXXV**Statements by Thad and Heidi Stokes**

From: Thad Stokes <tntadventures@gmail.com>

Subject: Please Consider Proposal F46

I am writing as a concerned small business owner. My wife and I own a halibut charter in Ninilchik, AK. We have operated our business for the last 15 years and we live here full time with our children.

Over the past 15 years, there has been continuous changes in regulations that have been detrimental to our ability to earn a livelihood and support our family. These changes make our future in Alaska very uncertain as we can not support our family here if this governing body continues to limit the days that we can run. We are advocating that you please consider proposal F46, which basically keeps the regulations for charters the same as last year.

It seems that each year regulations are altered and we are not made aware of these changes until well after our booking season has begun. This makes it very hard not only on us, but also on our clients, many of whom book months in advance. Ours state, and area especially, relies on tourism to support its sustainability. Changing regulations this close to the season limits our clients options and ultimately makes the Kenai Peninsula seem like a less desirable location to visit.

Thank you for your consideration and desire to maintain a strong economy on the Kenai Peninsula. Please consider Proposal F46.

-Thad Stokes

Owner, TNT Adventures

PO Box 39820 Ninilchik, AK 99639

From: Heidi Stokes <tntadventures@gmail.com>

Subject: Please Consider Proposal F46 to keep the Kenai Peninsula Alive

To Whom it May Concern,

I am writing as a concerned small business owner. I am an owner of a halibut charter in Ninilchik, AK. My husband and I have operated our business for the last 15 years and we live here full time with our children.

Over the past 15 years, there has been continuous changes in regulations that have been detrimental to our ability to earn a livelihood and support our family. These changes make our future in Alaska very uncertain as we can not support our family here if this governing body continues to limit the days that we can run. We are advocating that you please consider proposal F46, which basically keeps the regulations for charters the same as last year.

It seems that each year regulations are altered and we are not made aware of these changes until well after our booking season has begun. This makes it very hard not only on us, but also on our clients, many of whom book

months in advance. Ours state, and area especially, relies on tourism to support its sustainability. Changing regulations this close to the season limits our clients options and ultimately makes the Kenai Peninsula seem like a less desirable location to visit.

Bottom line is, our small communities rely on charter business to attract tourists. The majority of our year round residents rely on the revenue that is generated by sports-fishermen lodging here, eating here, and shopping here, whether from out of state or from the Valley. 15 years ago, fisherman from Anchorage composed over 75% of our business, now due to regulations, Anchorage clientele is down to well below 10% of our business.

The halibut charter industry for the lower Peninsula is its life blood, your continued trend in policy to limit availability negatively impacts every small business on the Peninsula. We have already lost the ability to attract travelers from Alaska, and further regulations limit our ability to attract clientele from outside the state.

Thank you for your consideration and desire to maintain a strong economy on the Kenai Peninsula. Please consider Proposal F46.

-Heidi Stokes

Owner, TNT Adventures

PO Box 39820 Ninilchik, AK 99639

[back to [Table 1](#)]

APPENDIX XXXVI**Statement by Bill Eckhardt**

From: Bill Eckhardt <Bill@Eckhardt.com>

Subject: Halibut Charter rules for Area 3A in 2020

To: IPHC

I am a 70 year old lifelong Alaskan and have fished for halibut in area 3A for 45 years as a long liner during the period 1980 - 1995, a charter operator from 1984 - 2007 and as a personal use fisherman since 1975. Now retired and having sold my boat, I rely on Charters when I go halibut fishing.

I recently heard that the Charter boat operators in Area 3A recommend to IPHC that a 4 fish annual limit, 2 per day, one any size and one under 26" with Tuesdays and Wednesdays closed be approved for the 2020 season. Those recommendations closely follow the Alaska Longline Fishermen's Association recommendations asking for an F46 SPR but willing to concede to an F43 SPR of 1.7 million pounds. This equates to 10.3% reduction in area 3A's allocation.

According to NOAA Fisheries economists, in the recent 2019 NOAA "Alaska's Valuable Recreational Fishing Industry/NOAA Fisheries" article, the 1.9 million pound cut in 2016 had a very negative effect on local economies. The article notes an \$85 million decline in economic activity for the rural Alaskan communities in Area 3A. These communities are seeing charter operators go out of business and other local businesses, who rely on a robust charter fishing industry, are also closing. To take more quota from the charter industry will further impact these already struggling Charter operators, businesses and communities.

Additionally, any future reductions in quota, if deemed necessary, should be announced at least a year in advance so Charter operators and communities have a reasonable time to plan for the change. Announcing a change just a few months before the season begins is grossly unfair to the clients, the Charter operators, crew members, and the businesses and communities where they operate. It quite simply adds insult to injury.

I respectfully ask that you approve the 3A Charter operators recommendations outlined in this letter regarding the rules for 2020.

Thank you,
Bill Eckhardt

[back to [Table 1](#)]

APPENDIX XXXVIIStatement by Kevin Cawley

From: Lucky Nine Charters <luckyninecharters@gmail.com>
Subject: IPHC 2020

I'm a charter boat operator in Kodiak, the actions of the IPHC have already had a negative effect on my small business. The fact is our whole island economy suffers right along with the whole state. To change regulations abruptly in February is not fair to the hard working families in the state or the people who come visit and pump millions of dollars into our economy. The proposed changes are not only recklessly damaging but also illegal and immoral, they go against the councils own mission statement and several laws in place today meant to discourage this blatant corruption. My ancestors have lived in Kodiak for thousands of years, if only our modern day government had half the integrity and wisdom concerning the natural resources God gave mankind we would all benefit. Do the right thing! Listen to the many people just like me who are no doubt voicing the same FACTS about your reckless handling of our shared resources, I will continue praying for all of you to have the wisdom and courage to take a step back and do your jobs well just like the many real people you are definitely harming right along with the very halibut you claim to "manage"

Kevin Cawley
(360)807-3367
luckyninecharters@gmail.com
www.luckyninecharters.com

[back to [Table 1](#)]

APPENDIX XXXVIIIStatement by Bob Savino

From: Bobby s <captbobsavino@gmail.com>

Subject: 2020 IPHC Halibut

To whom this may concern,

My name is Bob Savino and I am a sportfishing charter guide in Seward. I started my charter fishing career 12 years ago when I was hired by Saltwater Safari Company. Fishing has always been a passion of mine and the thought of being able to provide for myself by doing it has always intrigued me since a young age. I continued working for Saltwater Safari for most of my young adult life until I decided to make the huge leap to fulfill the American dream and start my own business. In 2015 at the age of 26, I started my own sportfishing charter outfit in Seward, "Anchor Down Sportfishing". In order to make that happen, I had to purchase a boat as well as a permit in order to halibut fish. I designed a brand new boat built in Washington State, which was purchased for \$450,000 and I was able to find a 10 passenger permit for sale for \$75,000. Obviously I needed some assistants to make these purchases so to the bank I went. I had never thought of having to borrow over a half a million dollars and as you'd expect, I was very nervous in doing so. But I knew this was something to me that was worth the risk and I was extremely excited to be able to fulfill my dreams of being a sportfishing guide with my own outfit!

My first couple years in business weren't exactly smooth.... I unfortunately encountered some mechanical failures that resulted in me having to purchase 2 brand new motors. This was extremely hard for me as that took from any profits I were to make for myself. Luckily my third and fourth seasons in business went a lot smoother and I wasn't questioning the decision to go into business as I was in my first couple years.

Now entering my fifth year in business, we are approaching a new obstacle, which is why I am sending you this letter. I'd like to note that in no way am I against any regulations. I started my dream because this is what I want to do for decades to come, not years. Whatever laws and regulations that have been put in place from fish limits, slots, and the days that we aren't allowed to operate halibut charters during the season, I have been all for because it is what's needed to be done in order for me to do this for decades to come. What scares me is if there is a bigger increase in these regulations, my dream might not last for decades to come. I'm afraid of it putting me out of business, being left with debt that I can't afford to pay, losing my boat and my halibut permit and have nothing to show for it. Every year at this time, I fear for what might happen. I started a business to live the American dream, and it has been thus far. But it's so scary not knowing what my future holds.... All of the fleet in Seward and I'm sure all over Alaska, spend more days tied to the dock with every year that passes.

This all being said, the loss of another day during our season could become detrimental to the entire sportfishing fleet in Alaska, and especially small business' like myself. I think the current plan of Tuesdays and Wednesday closures is a good restriction in place, therefore I am in favor of F46.

Thank you for taking the time to read my letter,
-Captain Bob Savino

[[back to Table 1](#)]

APPENDIX XXXIXStatement by Diana Allaway

From: Diana Allaway <ladyd8897@yahoo.com>

Subject: Fw: Dianes letter

Praying all our Letters make it to you and are considered by you.

My Family and I are the owners and operators of J Dock Sport Fishing and J Dock Seafood Market for 20 Years now. Bringing guest from all over the world to share the beauty and excitement of Alaska to them while fulfilling the bucket list of many, some in the last days of their lives, to experience the joy of sport fishing. The harsh changes being considered will so greatly affect not only people from around the world coming for a once in a lifetime experience, but many families with small business and their employees whom have dedicated many years to this being their life's work. If anything I am hoping you will consider Resolution F46SPR.

THANK YOU SO MUCH FOR YOUR TIME!!

Diana Allaway

Small Business Owner in Seward Alaska ♥

[back to [Table 1](#)]

APPENDIX XL

Statement by John Baker

To: International Pacific Halibut Commission

31 Jan 20

From: John G Baker, charter operator Area 3A

Subject: Upcoming Decision on Area 3A Allotment

As a 28 year charter operator in area 3A, I and my business have experienced all the industry turmoil of the 1990's and the regulatory changes of the 2000's. During that time, I always felt the small charter companies could find a way to cope and survive. Now, as a result of the adoption of the Catch Sharing Plan and the proposed 25% cut for area 3A, I no longer believe that.

I have always disagreed with the premise that charters can be regulated the same way as commercial halibut operations. They can't- at least successfully. The economics of supply and demand for a purely retail system like commercial fishing are very different psychologically than the outdoor recreation industry. Cutting back commercial allotment merely results in higher margin due to lower supply, but that doesn't happen in the charter world. Our clients hate our not having a consistent product. Stability in the product offered is supremely more important to charter operators than commercial fishermen.

Obviously the implementation of another 25% cutback in allotment will force instability in charter operations- to the point that, in my opinion, we will not survive. Already small towns like Ninilchik are dying due to the previous changes in regulations. We don't have the option of fishing for rockfish and lingcod etc., and charters are suffering tremendously. The major supporting tourism businesses, such as lodging and retail that rely on charter customers are gone. In fact, the General Store which has been the lifeblood of our community, closed last year due to lack of customers. That is just a harbinger of the real distress that is to come- the likely closure of our tractor launch system that we rely on to put our boats in the water.

The rationale for the 25% proposed cut for 3A is flawed. The latest study didn't include the recreational catch, bycatch, or charter fleet catch. If you are going to kill off the charters you better have all your ducks in a row before you make that decision.

I am asking for a repeat of last year's 3A charter allotment for 2020, or if you must implement reduction make it a phased-in process.

In addition, I think it is an absolute sin to force us to extinction while the bycatch kills (with no benefit whatsoever) over twice as much halibut as we do.

[back to [Table 1](#)]

APPENDIX XLI**Statement by Trey Graham**

From: Trey Graham <t3graham1@gmail.com>

Subject: 3A Sport fishing charter fleet

To Whom it may concern,

I am writing this email in attempts to change your minds on the proposed changes in the 3A sport fishing charter fleet. My name is Trey Graham, I live in Texas where I attend Texas Tech University during the school year. In the summers I live in Seward, Alaska where I work as a deckhand for J-dock sport fishing. My summers in Alaska mean the world to me. Along with making life long friends and memories, I am able to make enough money in the summer to support myself in the offseason so I can focus on school. The changes in the sport fishing industry would be detrimental to the small business I work for and many others like it, and also the town of Seward. I hope this email changes your mind and allows insight into the many people that rely on sport fishing as their main source on income, and others that come up yearly in order to chase their dreams and catch Alaskan halibut.

Thank you for your time,

- Trey Graham
J-Dock Sport fishing

[back to [Table 1](#)]

APPENDIX XLII**Statement by Bryson Gilbert****From:** Bryson Gilbert <gbrysongilbert@outlook.com>**Subject:** 3A Fishing Regulations

To whom it may concern,

The Alaska charter fishing industry is in scary place. Over the past several years the people whose lives revolve around charter fishing have noticed a dwindling of income. In a profession that is already plagued with great overhead and small profit margins, every day that the company can run trips becomes vital.

When I began my time as a charter fisherman, I was fresh out of high school and looking for a way to pay for my college. Over the past three years several things have become apparent.

- 1) The more regulation that is imposed the more upset the clients are
- 2) Charter fishing makes memories that last a lifetime
- 3) Charter fishing can support a community and
- 4) It's not a **Business** it's a **Family**

After the initial shock of hearing about the potential cut in quota I began thinking about what that would mean. Each summer I travel from Texas to Seward to work. I do this because I know that there will be thousands of people coming to Seward to visit, and that I will have the opportunity to make a difference in the lives of a few of these individuals.

A cut in quota would mean less tourists traveling to Alaska. This means less money spent in tourist shops and restaurants, less people riding the Alaska Railroad, less flights and passengers coming into Ted Stevens. The economic impact that the new regulations would take on these small fishing communities would be disastrous

Everyone is in agreement that the halibut need to be protected, but a cut in quota to the hardworking charter fisherman is not the appropriate answer. We urge you to reconsider the new regulations, and think about how these proposed changes will impact the lives of many hardworking individuals.

Sincerely,

Bryson Gilbert

J-Dock Sport Fishing Captain

[back to [Table 1](#)]

APPENDIX XLIIIStatement by John Moline

From: Current Affair Charters <info@currentaffaircharters.com>

Sent: Sunday, February 2, 2020 12:35 PM

To: IPHC Secretariat <secretariat@iphc.int>

Subject: 2020 3A allocations

Large changes in percentages of allowable catch, determined by a small sample, are not the typical avenues science and biology normally take to retain certain levels of abundance. It makes a lot of sense to take an average from a longer timeframe, and not to mix results from one specific area to another without comparison data. A lot of terms have been thrown around, like the F 46 for a starting point, but I prefer to use more common analogies and terms. Shifting the 3A underage from the 2018 season to a unit 900 miles plus away is not reasonable or responsible science. If that quota had been applied to 3A, as it should have been, we would not be over out limit, even with the new 90% female fish kill rates.

Charters already have bookings in the 2020 season, and I personally have 8 Thursdays already booked with halibut trips, and most cannot rebook to adjacent days on my vessel. The financial impact of \$16,000 in losses I have collected deposits on, is a very large percentage of my profit for the year. By not smoothing out the incredible 25% adjustment area 3A is looking at, many newer businesses, and many of us who have purchased newer boats or motors will not survive the year. The economic impact of such a reduction to all of 3A small town economies will be devastating, it will affect everything from hotel stays and bed taxes, to restaurant sales and fuel tax collections, let alone parking fees and harbor slip sales and rentals.

Please consider all aspects of economies, the employees, the economic losses and livelihood of the small business owners involved in the Charter fishing industry, when we are typically allocated such a small overall catch each year (@10% or less of total catch), and remember, we have already taken huge hits thru fleet reduction for CHP issuance, and @ over 1 million lbs in reductions already, from 3 million, to 1.7 million, that is already some pretty large cuts financially to ALL of our local economies and tourism.

Thank you for your consideration, John Moline Current Affair Charters, Seward AK. 99664

[back to [Table 1](#)]

APPENDIX XLIVStatement by Kyle Stene

From: Kyle Stene <kyle_stene@yahoo.com>
Sent: Sunday, February 2, 2020 12:35 PM
To: IPHC Secretariat <secretariat@iphc.int>
Subject: Halibut regulations

Hello,

My name is Kyle Stene, I have worked in Seward, AK for several years as a fisherman for J-Dock Sport fishing. I am contacting you regarding the sudden changes regarding the amount of days you can harvest halibut throughout the summer. Hundreds of people as well as dozens of local companies depend on the sport fishing in Seward, AK.

If the fisheries management takes away two or three halibut days a week, the economic impact on the city of Seward and the hardworking Americans who rely on tourism and sport fishing will suffer greatly. There is no question that sport fishing is great for all of Seward's small business owners and the entire economy. The fisherman who work in Seward depend on people coming to Seward to fish for halibut. It doesn't just affect the economy it affects the other species of fish as well. If we can't fish for halibut on those days, we have to go for rockfish, salmon, and ling cod and then those species of fish take a pounding. I agree that there should be some changes made to halibut regulations so that we can continue to fish them for generations, but it doesn't need to effect the national economy and the fishing industry as well.

Please consider the local economy as well as the economic impact of the people that rely on sport fishing halibut in Seward, AK.

Best regards,

Kyle Stene

[back to [Table 1](#)]

APPENDIX XLVStatement by Homer Charter Association

Attention: IPHC

The Homer Charter Association (HCA) represents around eighty charter boat operators and business owners in Area 3A including Homer, Whittier, Seward, Ninilchik, Deep Creek, and Kodiak. It has been a frantic couple of months as we have spent endless hours trying to prepare ourselves for what could be the most devastating management measures our fishery has seen. Since the implementation of the Catch Share Plan we have had increasingly tighter restrictions on our resource. These restrictions have limited our access to a public resource. Size restrictions and annual limits have virtually extinguished our resident anglers and now we are limited in the number of days of the week that we can fish. The proposed TCEY for 2020 would further reduce the size of our fish and would close additional days of the week. Our fishery cannot support additional cuts. If our businesses lose Tuesdays and Thursdays in addition to our already closed Wednesdays, we will not remain viable and many businesses across the state will close.

The effects of these restrictions won't be shared by the charter industry alone. They will be felt in all of our local economies. Hotels, bed and breakfasts, restaurants, car rental companies, gift shops, fish processors, tackle shops, eco tours, etc... All of these business models rely on tourism to function. Further, this economy provides large amounts of sales tax to cities, boroughs, and the State of Alaska. The loss of funds to ADF&G in the form of fishing license sales will greatly affect their ability to manage our delicate state-run fisheries. There is no way around it; as the economic stability of the tourism industry loses stability, dependent local economies like those the Homer Charter Association represents will suffer all across Alaska.

It is apparent that the Catch Share Plan has not been an effective management tool for the Charter sectors in both Area 3A and 2C. It has led to frequent and fast paced changes in regulations for our sector which have made it extremely difficult to conduct viable businesses. In the current management paradigm charter businesses must wait until February to find out what management changes may occur. This is "late in the game", most charter operators book their clients throughout the year. Often clients book a trip based on current knowledge of the fishery, but late-in-the-year management measures give them wholly another trip by the time the season arrives. Consequently, we have had an increasingly skeptical client base, who expects to pay for access to this great state and its incredible fishing resources but is often denied. The HCA values informed and responsible stewardship of the halibut resource, however we feel that we need a different tool to manage our allocation. We need consistency in our management measures so that we can continue to offer consistent public access to the fishery. We hope both the NPFMC and the IPHC will seriously consider this when reviewing the CSP in both 2020, and in 2021.

The Homer Charter Association supports that the IPHC adopt a Harvest Rate of F42-F43, and that the IPHC adopt a target removal of 1.7 million pounds for the 3A charter sector as a lowest possible allocation. Additionally, the HCA requests that the IPHC follow MSA guidelines and authority, IPHC Harvest Strategy Policy, and IPHC Management Strategy Evaluation to redistribute TCEY back to IPHC Area 3A from Areas 2B and 2A. Under this target removal Area 3A management measures would close all Wednesdays, close all Tuesdays, change the size of

the second fish to U26, one trip per CHP per day, 4 fish annual limit. Any restrictions beyond these measures would be catastrophic to our industry.

Thank You for your careful consideration

Ben Martin, President HCA

Brian Ritchie, Board member HCA

[back to [Table 1](#)]

APPENDIX XLVI

Statement by Jason Ogilvie

February 1, 2020

International Pacific Halibut Commission
2320 West Commodore Way, Suite 300
Seattle, WA 98119

Submitted via: secretariat@iphc.int



Dear Commissioners,

Area 4B is facing extraordinary circumstances in 2020 (which are expected to continue for several years), the effect of which we ask that you incorporate in your policy discussions.

Specifically, because of the declining Pacific cod biomass in the Bering Sea the catcher vessel trawl federal waters Pacific cod fisheries in the Aleutian Islands (Area 4B) are expected to be preempted. As a consequence, the Area 4B directed halibut fishery is essential to the continued operation of our local fleet, our plant and our community.

This is both an economic and social crisis for our region. The preemption of the federal waters Pacific cod fishery is already having significant negative impacts; the directed halibut fishery is one of the few opportunities for the local fleet until this situation resolves itself.

In response to this situation, and giving full consideration to recent survey and CPUE data, we request a minimum 1,060,000 pound 4B FCEY for 2020. Our rationale follows.

Discussion

1. In early 2019, the US District Court in Washington DC vacated Amendment 113, which set aside 5,000 metric tons of Bering Sea CV Trawl Pacific cod for harvest in the Aleutian Islands. This court decision, combined with the declining Bering Sea Pacific cod resource and the increased race for fish in the Bering Sea is expected to completely preempt the Aleutian Islands CV Trawl Pacific cod fishery in 2020. Obviously, halibut bycatch associated with the Aleutian Islands CV Trawl Pacific cod fishery should be dramatically adjusted downward, if not zeroed out.
2. For 2019, the IPHC projected a non-directed commercial discard mortality of 220,000 pounds. As shown in IPHC-2020-AM096-05 (below), the actual 2019 Area 4B non-directed commercial discard mortality was 162,000 pounds (see chart). This provides some additional rationale for decreasing the projected bycatch for 2020.

3. Genetic, oceanographic and tagging studies have shown that the Aleutian Islands are a discrete ecosystem and that the halibut stock in the Aleutian Islands shows little if any migratory contribution to other areas, (Hauser, et al., 2006) (Seitz, et al., 2008). Therefore, we don't see the rationale for setting 4B TCEY based on 75% of the rate used in other non-nursery areas.
4. We recognize the challenge that the IPHC faces relative to Area 4 CDE and other coastwide issues. Area 4B has 4.8% of the Pacific halibut biomass and should have 4.8% of the coastwide TCEY. While we don't see the rationale for setting Area 4B TCEY based on 75% of the rate used in other non-nursery areas; if Area 4B continues to take the 25% cut in the exploitation rate built into the "Tool" relative to the eastern areas, there are no grounds for reducing Area 4B's share of the coastwide distribution of TCEY below 3.9%. Reducing Area 4B doesn't benefit other areas biomass because, as we have noted, the Aleutian Islands is its' own marine ecosystem. Therefore, if the Conference Board or the Commission adopts the recommended 31.9 million pounds, Area 4B's TCEY should be no less than 1.24 million pounds for an FCEY of 1.06 million pounds.

IPHC-2020-AM096-05

Table 2 continued. 2019 estimates of total removals (net weight), including fishery limits and mortality of Pacific halibut by IPHC Regulatory Area (as of 15 December 2019).

IPHC Regulatory Area	Fishery projection (net weight)		Mortality (net weight)		Percent %
	Tonnes (t)	Pounds (lb)	Tonnes (t)	Pounds (lb)	
USA – Area 4B (central/western Aleutians)	657.84	1,450,300	547.84	1,207,777	83
Directed commercial fishery landings	548.85	1,210,000	443.50	977,742	81
Directed commercial discard mortality ¹	9.07	20,000	17.24	38,000	190
Recreational fishery ¹	0.00	0	0.00	0	0
Recreational discard mortality	0.00	0	0.00	0	0
Subsistence ¹	0.14	300	0.76	1,684	561
Non-directed commercial discard mortality (O26) ¹	99.79	220,000	73.48	162,000	74
IPHC fishery-independent setline survey and research	none	none	12.86	28,351	n/a
Non-directed commercial discard mortality (U26)	none	none	3.18	7,000	n/a

Sincerely,



Jason Ogilvie, President
Golden Harvest Alaska Seafood
Adak, Alaska

(signed: Steve Minor for Jason Ogilvie)

[back to [Table 1](#)]

APPENDIX XLVII**Statement by Brian Baker****From:** BRIAN BAKER <camp410bc@yahoo.com>**Sent:** Sunday, February 2, 2020 1:28 PM**To:** IPHC Secretariat <secretariat@iphc.int>**Subject:** 3A Halibut Charter Restrictions

To whom it may concern,

My wife and I run a small charter business in Ninilchik Alaska. We are voicing our concerns about more cuts to the 3A fishery.

We run a one boat charter and have felt the pinch every year. In 2019 we were given back a few Tuesdays and then we are being told that we are going to lose all Tuesday's in 2020. This would essentially double our down days not to take into account any rough water days that we sit on the beach. This not only Effects the Charter Fleet but it also effects a spider web of local business's in the state. We need to be able to inform and book clients prior to February. February is far too late to make a decision in regards to our livelihood. There has to be a better and less painful way to make everyone happy and not put the little guys out so the big guy can have it all.

There is a far greater impact to our community if we reduce to 5 days a week fishing. The local restaurants will suffer the local accommodations will suffer, and not to mention the handful of business the are here to support the charter fleet in our community from gas, bait and launch ramp services. Everyone should be able to work hard and make a living and not suffer when new and different regs are adopted each year.

Thank you

Richard Baker

[back to [Table 1](#)]