



NPFMC Catch Sharing Plan Testimony House Special Committee on Fisheries

Alaska Charter Association

Richard Yamada September 1, 2011

Sport fishing is a \$1.4 Billion Industry

ADF&G 2007 Southwick Study

- Southcentral Alaska
 - Supports 11,535 area jobs
 - \$91 million in state and local taxes
- Southeast Alaska
 - Supports 1,897 area jobs
 - \$14 million in state and local taxes

Charter Management has been based on fears that no longer exist

- Exponential growth in the charter fleet will destroy the commercial fishery
- Over-fishing by charter fleet threatens the sustainability of the resource

Exponential growth in the charter fleet will destroy the commercial fishery

Active Charter Vessels in Southeast Alaska

	2005	2006	2007	2008	2009	2010
Ketchikan	152	143	154	141	130	129
POW	162	171	182	183	162	146
Petersburg/ Wrangell	62	53	59	53	54	52
Sitka	223	228	223	222	194	180
Juneau	120	117	113	112	105	88
Haines/ Skagway	14	13	11	10	11	9
Glacier Bay	79	80	87	96	84	91
Yakutat	14	15	16	14	10	11
TOTAL	738	747	768	757	670	644

Over-fishing by charter fleet threatens the sustainability of the resource

AREA 2C - Southeast Alaska Commercial Catch Limits (M lbs)			
Year	FCEY	Approved Catch Limit	Over FCEY
2006	10,330	10,630	300
2007	4,980	8,510	3,530
2008	3,920	6,210	2,290
2009	2,860	5,020	2,160
2010	2,390	4,400	2,010
		TOTAL	10,290
Exploitable Biomass - Other Removals = FCEY (Fishery Constant Exploitable Yield)			
AREA 2C - Southeast Alaska Sport Charter Harvest (M lbs)			
Year	GHL	Charter Harvest	Over GHL
2006	1,432	1,804	372
2007	1,432	1,918	486
2008	931	1,999	1,068
2009	788	1,245	457
2010	788	1,279	491
		TOTAL	2,874
GHL - Guideline Harvest Level			
*Data for both tables from IPHC 2011 Blue Book pg. 13, 155.			

Over-fishing by charter fleet threatens the sustainability of the resource

Area 2C is currently under a one fish 37" Rule.

Based on 2011 mid-season ADF&G reports, Area 2C will be under their GHL by as much as 40 per cent at the end of their season.

Catch Sharing Plan (CSP)

1. First “Hard Cap” allocation to charter sector.
2. Allocation will be up to 30% lower than under current management regime.
3. Allocation based on fishery model that no longer exists.
4. Allocation decisions will bypass Federal APA rule making process and U.S. allocations will be made at the IPHC.
5. Compensated transfer mechanism proposed will make charter fleet commercial fishermen.

Catch Sharing Plan (CSP)

1. First “Hard Cap” allocation to charter sector.

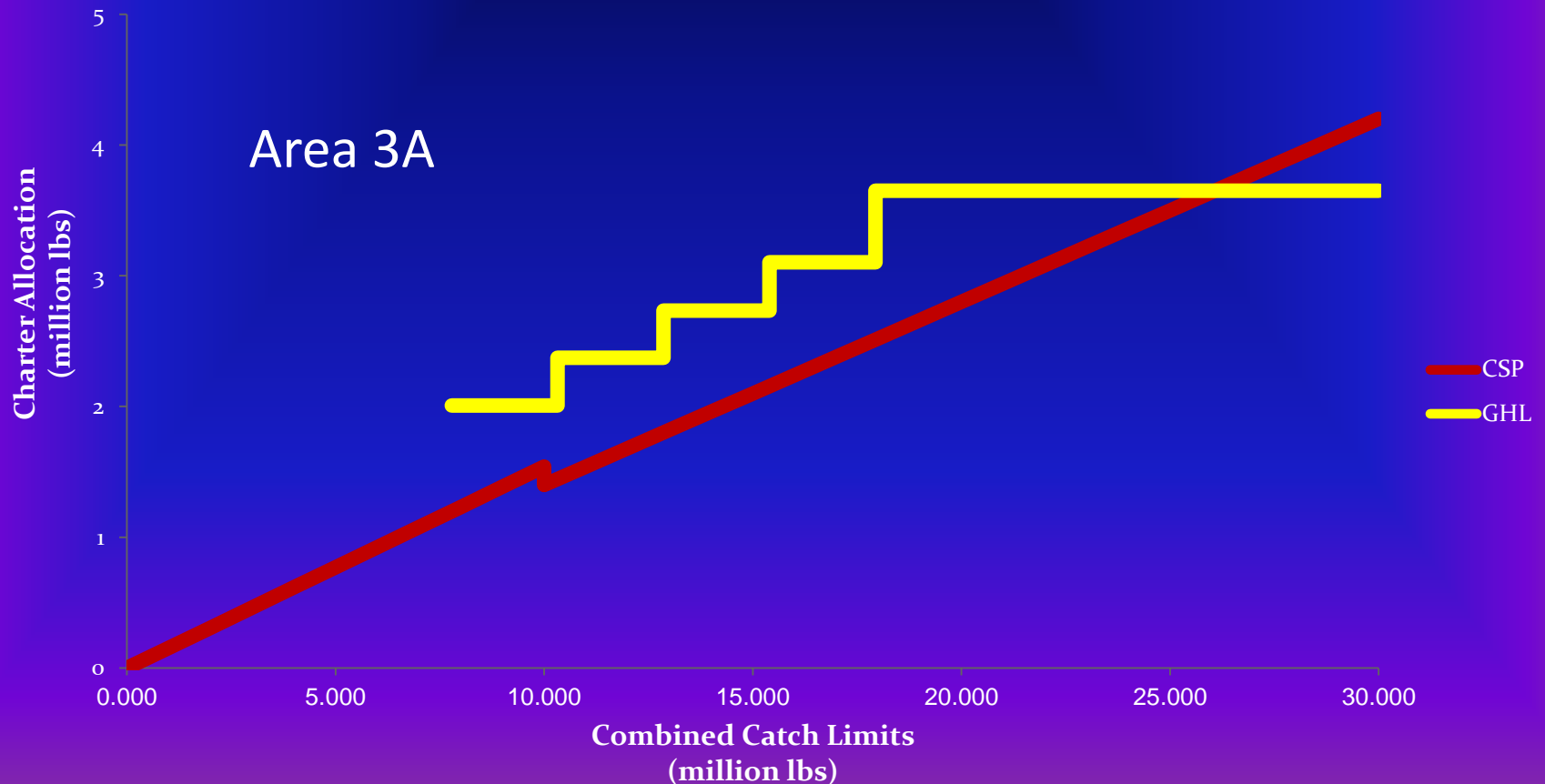
Current management of charter sector conducted under a Guideline Harvest Level (GHL) established in 2003.

Initial level was set too low for Southeast and harvest by guided anglers was exceeded from first year of implementation.

Charter overages dwarfed by the amount of fish commercial sector was allowed to overharvest.

Catch Sharing Plan (CSP)

2. Allocation to charter sector will be up to 30% less than current management system.



Catch Sharing Plan (CSP)

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Charter Allocation if CSP were implemented in 2011
Area 3A – Southcentral Alaska

Total CEY	Other Removals	Combined Fishery CEY	GHL M (lbs)	Charter Allocation	CSP Charter Allocation M(lbs)	CSP Vs. GHL
23.52	5.51	18.01	3.65	14%	2.521	-30.92%

Catch Sharing Plan (CSP)

3. Allocation based on fishery model that no longer exists.

Prior to 2008, IPHC used a “Closed Area Assessment Model” to determine exploitable biomass.

Since 2008, a “Coastwide Assessment Model” has been used that significantly reduced exploitable biomass.

CSP analysis and allocations based on outdated model and data.

Catch Sharing Plan (CSP)

3. Allocation based on fishery model that no longer exists.

This reduction in allocation and useless projections will result in increased charter harvest restrictions.

For **Southcentral** – a reduction from two halibut per day to one halibut per day.

For **Southeast** – further reduction of fish size, from 37” to as low as 32” .

Catch Sharing Plan (CSP)

4. Allocation decisions will bypass Federal APA rule making process and U.S. allocations will be made at the IPHC.

The Administrative Procedures Act (APA) requires federal rule making to follow strict scientific analysis and provides the opportunity for public comment.

CSP will direct decisions on allocation to the International Pacific Halibut Commission (IPHC) that is not bound by the APA.

Catch Sharing Plan (CSP)

4. Allocation decisions will bypass Federal APA rule making process and U.S. allocations will be made at the IPHC.

The IPHC sets catch limits internationally, but does not have the authority to set domestic allocations.

There is no recreational representation on the IPHC.

The charter sector will be arguing issues in front of a foreign court consisting of 50% Canadians.

Catch Sharing Plan (CSP)

5. Compensated transfer mechanism proposed will make charter fleet commercial fishermen.

CSP provides for a temporary compensated transfer mechanism called GAF (Guided Angler Fish).

Charter operators sell the “opportunity to catch fish”. Under the GAF program, charter operators will sell the GAF fish to willing buyers after the fish is caught.

Catch Sharing Plan (CSP)

5. Compensated transfer mechanism proposed will make charter fleet commercial fishermen.

Question: Will this violate State and Federal sport fishing regulations that prohibit the sale of sport caught fish?

What does this mean to the State of Alaska?

Implementation of the Catch Sharing Plan will lead to reduced fishing opportunity for guided recreational anglers, of which 60% in Southcentral are Alaska residents.

Less angling opportunity will lead to less angler demand. Charter and local businesses will suffer.

Revenue from sport fishing licenses will decline. 60% of the Dingell-Johnson funds are based on fishing license sales.

What does this mean to the State of Alaska?

The Criddle study on Pacific Halibut found that benefit maximization occurs when the commercial sector has 71 percent and the recreational sector has 29 percent of the harvest pounds as compared to an 87 percent and 13 percent in 2007 (NPFMC 2008).

Need to consider the optimal economic benefit to local communities in allocation decisions between recreational and commercial fisheries.

Action Needed

A letter to our Alaska Delegation requesting a 60 day extension of the comment period so charter operators have the time to comment.

Request the Governor to weigh in on this unfair and inequitable regulation.

Thank You