

SJR

38

(File 2)



SENATOR FRED F. ZHAROFF

ALASKA STATE LEGISLATURE

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DURING SESSION:

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DISTRICT N

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SJR 38 SPONSOR STATEMENT

January 21, 1992

The Alaska commercial fishing industry is a vital component of Alaska's social and economic structure, the product of a dynamic matrix of elusive and abundant fishery resources, fluctuating markets, and a wide variety of diverse regional interests and needs.

The North Pacific Fishery Management Council (NPFMC) has focused a great deal of its attention on addressing certain problems in the Alaska halibut and sablefish fisheries for many years. These considerations have primarily concentrated on the development of a share-quota, or Individual Fishery Quota (IFQ) management plan for these fisheries.

IFQ management has been a highly controversial question since it was initially discussed for the Alaska halibut fishery in the early 1980s. While IFQ management had some support at that time, strong opposition to this type of management was expressed by many individual fishermen, fishermen's organizations, processors, municipalities, and other organizations. In 1983, the Alaska Legislature expressed its opposition in Legislative Resolve Number 7, "Relating to the imposition of a halibut moratorium and the establishment of a shares system for halibut in Alaska".

Since that time, the NPFMC has continued to pursue the development of IFQ management plans for the halibut and sablefish fisheries regardless of the continued opposition. At their December, 1991 meeting the Council passed an IFQ management plan for the halibut and sablefish fisheries in spite of overwhelming testimony against such action. Again, concerns were strongly expressed by a large and diverse group of individuals, organizations, and industry and municipal representatives, to no avail.

The NPFMC has essentially decided to address the problems they have identified in the halibut and sablefish fisheries by artificially inducing a dramatic reduction in the number of participants through economic attrition. Any IFQ plan will exclude participants who fail to meet the criteria to qualify for initial share allocations. "Marginal" operators will find it necessary to either buy more shares to allow them continued viability in the fishery, or sell out completely---an increased burden on the conduct of their business either way. Eventually those with the greatest wealth and financial stability will survive this attrition process, and those fisheries will be owned by fewer and fewer people.

Referring to a study of the socio-economic impacts of the IFQ plan passed by the NPFMC now being conducted by the National Marine Fisheries Service (NMFS), council member Clem Tillion recently was recently quoted: "The state supports the program and is convinced the study will show it is beneficial for Alaska to do this", and regarding Governor

Hickel's request that the Council delay proceeding with the implementation process of the plan until the NMFS study is completed, that the governor was "reacting to a lot of community councils who don't know anything about fishing" (Anchorage Daily News, January 14, 1992).

The implementation of an IFQ system in the halibut and sablefish fisheries will have serious impacts on the Alaska commercial fishing industry and Alaskan coastal communities. This action will be precedential and virtually irreversible. Concerns that have been repeatedly expressed regarding the socio-economic impacts and the administrative and enforcement costs of IFQ management have not been adequately recognized or addressed by the NPFMC. Alternate, more flexible management measures have not been attempted.

I urge the Legislature to once again add its voice to those who wish to maintain the commercial fishing industry as one of the most important elements of our state's economy. I urge your support and the expeditious approval of SJR 38.

SJR 38

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North Pacific Fishery Management Council

Richard B. Lauber, Chairman
Clarence G. Pautzke, Executive Director

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Anchorage, Alaska 99501



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July 19, 1991

Dear Reviewer:

Enclosed is a draft Environmental Impact Statement/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EIS/RIR/IRFA) of proposed individual fishing quota management alternatives for the halibut fisheries in the Gulf of Alaska and Bering Sea/Aleutian Islands. This document was reviewed by the Council at their June 24-29, 1991 meeting and approved for public distribution.

The Council requests that anyone having additional information pertaining to the amendment, its alternatives, or the draft EIS/RIR/IRFA, submit it to the Council during the 45-day public comment period which commences August 2, 1991. All new information will be summarized and included when possible in the final documents. Written comments should be received in the Council office no later than 5:00 p.m. (ADT) on September 16, 1991.

The Council is also asking for the opinions of the fishing community and other affected individuals regarding which alternatives the Council should approve. It is hoped that the draft analysis will help the public provide meaningful and constructive feedback to aid the Council in their deliberations.

At their September 23-27, 1991 meeting in Anchorage, the Council will make their final decision on whether to submit the amendment and supporting documentation to the Secretary of Commerce for implementation. The Council will accept oral testimony at the September meeting; however, such testimony should be limited to clarification of earlier written comments and recommendations about the Council's choices rather than submission of new information.

1.0 INTRODUCTION

1.1 Management Background

The commercial harvest of halibut began off Alaska in the 1890s. The size of the fleet increased with the advent of power driven schooners and cold storage plants. (Thompson, 1975). The steamer fleet with sail-powered dorys peaked in 1914 and declined thereafter. Next came a schooner fleet in the 1920s. These vessels were designed solely for longlining and many are still fishing. Most of the vessels currently operating in the halibut fleet were constructed in the 1970s and are capable of using more than one gear type (IPHC, 1989). Halibut harvests coastwide have ranged from 56.9 million lbs in 1929 to a low of 21.3 million lbs in 1974 and a peak of 74.3 million lbs in 1988.

The management of halibut was originally controlled by both Canada and the U.S., each off their respective coasts. In 1923 the International Pacific Halibut Commission (IPHC) was established by a convention between the two nations. An additional treaty was signed in 1953 and amended by protocol in 1979. The IPHC has the authority to:

1. Establish regulatory areas;
2. Limit catch by area;
3. License vessels;
4. Regulate gear types;
5. Protect nursery areas;
6. Collect statistics; and
7. Conduct scientific research.

The IPHC has exercised its authority in all of these manners and currently uses regulations of all seven types off the coast of Alaska.

In 1982, the U.S. government added to the management of halibut by delegating additional, but not conflicting, regulatory authority with the geographically responsible Fishery Management Councils (Northern Pacific Halibut Act of 1982, P.L. 97-176). Among other authorities, this act allows the Councils to develop limited entry criteria as set forth in Section 303(b)(6) of the Magnuson Fishery Conservation and Management Act (MFCMA) for approval by the Secretary of Commerce. This limited entry authority is provided "That the Regional Council may provide for the rural coastal villages of Alaska the opportunity to establish a commercial halibut fishery in areas in the Bering Sea to the north of 56 degrees north latitude during a 3 year development period." (16 U.S.C. 773-773k). The Act also prohibited foreign fishing for halibut in the 200-mile Exclusive Economic Zone (EEZ). The North Pacific Fishery Management Council (Council), by virtue of its geographical authority under the MFCMA and the Halibut Act, regulates halibut off the coast of Alaska.

In 1978 the Council became concerned about a rapidly expanding halibut fleet. Total allowable catches (TACs) of halibut were increasing each year but the seasons were shortening. Concerns centered on resource management and the availability of a quality product to the consumer throughout the year. In November 1978, the Council set December 31, 1978 as a cut-off date for eligibility in the eventuality that some form of limited access was developed in the succeeding two or three years.

Beginning in 1979, workgroups began to assess methods of limiting access to the halibut fishery. A moratorium was proposed by the IPHC at their February, 1982 meeting, requested by various industry segments, and approved by the Council at its March, 1982 meeting. Regulations to implement the

moratorium were published in the Federal Register on February 3, 1983 (48 FR 4861-4863). The moratorium was disapproved by the Administrator of NOAA on June 15, 1983 following a recommendation from the Office of Management and Budget (OMB). The reason given for disapproval was that "(a) moratorium on entry into this [halibut] fishery would not contribute to a resolution of the problems of excess participation and overcapitalization, and could even introduce further inefficiencies and inequities to the fishery." (NMFS, 1983). The refusal referenced an OMB suggestion that any further consideration of limited access include an alternative "with free marketing of fishery permits by individuals" (OMB, 1983).

During this same time period, consideration was already being given to an IFQ form of management. The Council contracted with Northwest Resources Analysis of Seattle, Washington to prepare a study of limited access options in the halibut fishery (Northwest Resource Analysis 1983). Because there was substantial information already available about other forms of limited entry, the Council directed that the study should determine whether an IFQ system would be feasible under the current conditions of the fishery. The report concluded that an IFQ system of management held the greatest potential for resolution of problems in the fishery. The report estimated that potential net benefits from such a system, including costs of unreported catch, would be at least \$5.373 million.

Following disapproval of the moratorium, the Council continued with some studies of halibut limited access. However, the Council's halibut workgroup soon dissolved and Council energies were redirected to other issues. Limited access energies switched to sablefish in 1985 and to all groundfish, crab, and halibut in 1987. In 1986, concurrent with limited access discussion for the sablefish fishery, the Council awarded a contract to Dittman/Graystar to survey the groundfish industry concerning future problems and management strategies.

Dittman/Graystar completed surveys of 82 processors and 408 harvesters (Dittman/Graystar, 1987). Seventy-four percent of the harvesters and 76% of the processors thought that current management was a problem in the groundfish fishery. Of these, 30% of the harvesters thought the main problem was too much effort and 29% of the processors thought the problem was too short an opening. Forty-five percent of harvesters targeting primarily on sablefish thought the problem was too much effort as did 32% of those having sablefish as the secondary species. When asked if there would be a need to limit the number of fishermen in the future, 60% of the harvesters and 58% of the processors said "yes". Of those harvesters targeting primarily on sablefish 65% said "yes", and 71% of those taking sablefish as a secondary species said "yes".

At its September 1987 meeting the Council adopted a Statement of Commitment for groundfish management (NPFMC, 1987a) which read, in part:

"Expansion of the domestic fleet harvesting fish within the EEZ off Alaska has made compliance with the MFCMA's National Standards and achievement of the Council's comprehensive goals more difficult under current management regimes. The North Pacific Fishery Management Council therefore is committed to pursue alternative management methods that will support the Comprehensive Goals adopted by the Council and achieve more productive and rational effort and harvest levels in the groundfish fishery."

The statement went on to say that, in order to fulfill this commitment, the Council will:

3. Consider effort management in the halibut and crab fisheries."

The Council began development of sablefish limited access alternatives following the September meeting. The Council stated that any such limited access system developed for sablefish should be flexible enough to incorporate halibut in the future.

The Council directed its staff in April 1988 to develop five management options for the sablefish fixed gear fishery: (1) open access with no action taken; (2) open access modified to include sablefish and halibut as bycatch in other hook and line fisheries; (3) individual fishing quotas; (4) license limitation; and, (5) a system which combined permits, IFQs, and open access fisheries. A draft sablefish management document including these alternatives was released for public review on August 10, 1988.

At its December, 1988 meeting, the Council refined the options to be considered for sablefish limited access. They indicated their preference to expand and analyze two options: IFQs and licenses. A Sablefish Management Committee composed of Council members was formed to review these alternatives and make recommendations as necessary.

At its January 1989 meeting, the Council began consideration of limited access for all fisheries under its jurisdiction. The Sablefish Management Committee was then renamed the Fishery Planning Committee and given the task of structuring management approaches for all fisheries. The Committee met several times during the spring of 1989 to develop recommendations to the Council concerning problems and concerns facing the fisheries. A series of public scoping meetings focused on limited access for all species, including halibut, were held in Seattle, Kodiak, Dillingham, Sitka, and Anchorage (NPFMC, 1989a).

A major task of the Fishery Planning Committee was to make specific recommendations on the structure of IFQ and license systems for sablefish and halibut. At its April, 1989 meeting the Council received additional testimony, mostly against limited access. The Council modified several of the Committee's recommendations and, at its June meeting, directed the staff to fully analyze two alternatives for sablefish management: license limitation based on vessel size class and individual transferable quotas (ITQs) based on historical landings. At its September 5 meeting, the Committee directed staff to analyze a third alternative, annual fishing allotments (AFAs). This open access alternative was incorporated into the analysis by the Council at its September meeting, and the draft SEIS/RIR/IRFA was released for public review in November, 1989.

At its January, 1990 meeting, the Council determined that the license limitation option and the annual fishing allotment option were unacceptable in terms of adequately addressing the ten problems identified in the sablefish fisheries. Therefore, they directed staff to prepare additional analyses of only two options: continued open access and Individual Fishing Quotas (IFQs). A Supplement to the SEIS/RIR/IRFA was presented to the Council at the April, 1990 meeting and released for public review in May, 1990. A final decision for sablefish limited access was scheduled for June, 1990 with a target implementation date of 1992. With the Council unable to form a consensus on the specifics of an IFQ system at the June meeting (or at the subsequent August, 1990 meeting), the issue was tabled until the following meeting. At the September, 1990 meeting the tabled motion was revived and then immediately tabled again until the December meeting. At the December, 1990 meeting the motion was removed from the table and remanded to the Fishery Planning Committee for further development. This further development was to include additional options for an IFQ system which were introduced at the December meeting. The Council also went on record at that time expressing the intent that the same alternatives for an IFQ system would be considered for the halibut fisheries as well, and that, ultimately, some type of combined IFQ system would be considered for both sablefish and halibut.

Note that, while the alternative IFQ systems shown in Table 1.1 constitute individual packages, it is the Council's intent to be able to choose from among the components of each system when designing the final IFQ alternative.

1.4.3 Alternatives considered and rejected

When the Council began consideration of limited access alternatives for sablefish in 1987, there were three basic alternatives to open access which were considered: license limitation, individual fishing quotas, and annual fishing allotments. These three systems have been discussed and analyzed in detail since that time (NPFMC 1988, NPFMC 1989). Based on these discussions and analyses, the Council has gone on record as stating that "neither license limitation nor annual fishing allotments were acceptable alternatives for solving the problems in the sablefish fisheries".

The Council discussed annual fishing allotments but determined that because this alternative combined open access and a form of individual fishing quotas, it would result in a more complicated management program than either program alone and would not eliminate the problems associated with open access management.

The Council discussion on license limitation concluded that a reduction in fleet size would be necessary to temporarily alleviate the problems in the sablefish fishery. It was apparent that such a reduction might not be possible in an equitable manner. It was also apparent that a reduction in the number of vessels could soon be offset by an increase in fishing power per vessel and that this alternative would only change the rules of the race for fish but would not replace it as the mechanism for allocating fixed gear sablefish TACs among competing fishermen.

In short, neither license limitation nor annual fishing allotments held the potential for alleviating the basic problem in the fishery which is the race for fish. It is this race for fish which gives rise to a myriad of other problems in the fishery as identified in the preceding chapter. Therefore, the Council proceeded to undertake a more extensive analysis of the IFQ alternative to open access. Discussions and analyses of limited entry since then have centered on the specific components of a possible IFQ alternative management program. As the Council discussions for sablefish management proceeded through 1989, 1990, and 1991 the halibut fisheries were brought into the picture for IFQ consideration as well. The Council and its Fishery Planning Committee have worked towards refining the IFQ alternatives for sablefish with the intent that such a system would eventually incorporate halibut. Therefore, the only viable option to open access in the halibut fisheries was deemed to be an IFQ system which would work in conjunction with a sablefish program, and possibly with other longline fisheries. The specific options for an IFQ system for halibut have closely mirrored those set down for sablefish. The structure of this EIS, as well, closely mirrors the analyses performed to date for sablefish limited entry alternatives.

1.5 Arrangement of this Document

This document contains ten additional chapters. Chapter 2 describes the biology of halibut and their physical environment. Chapter 3 contains a description of the social and economic environment surrounding the halibut fishery, including descriptions of the harvesting, processing, and marketing sectors of the industry and a description of recreational and subsistence fisheries. Chapter 4 contains the detailed analysis of the effects of the different options within the IFQ alternatives and a comparison of these effects to the status quo. Chapter 5 of this document is devoted to the social aspects of the fishery. This chapter contains detailed information on the rural/coastal communities which may be impacted by an alternate management system. This includes current information on

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United States Senate

COMMITTEE ON APPROPRIATIONS
WASHINGTON, DC 20510-6025

JAMES H. ENGLISH, STAFF DIRECTOR
J. KEITH KENNEDY, MAJORITY STAFF DIRECTOR

December 4, 1991

Richard B. Lauber
Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510

RECEIVED JAN 13 1992

Dear Rick:

I'm informed that the Council plans to take final action at its current meeting on a proposal to implement Individual Fishing Quotas (IFQs) for sablefish and halibut. I continue to hear from Alaska fishermen who are concerned about the impact of the proposal on them and the communities who depend on income from these fisheries. Some have gone so far as to ask me to oppose IFQs altogether. I understand that Congressman Young has also written you regarding the IFQ proposal.

Last June I wrote to you to express a number of concerns about the IFQ concept. It is still not clear from the Council's November 22 decision document what this proposal will cost and how it will be funded. It appears that the proposal could cost at least \$4 million annually. If those funds are to come from the already tight National Marine Fisheries Service budget, other important fishery programs, such as stock assessment and high seas fishery enforcement, may suffer.

The Council's decision document has only been available to the public for 12 days, so many fishermen have not yet had time to assess the impact the IFQ proposal will have on them or their communities. Given the time and effort that the Council has spent developing the IFQ concept and the importance of this decision, I urge you and other members of the Council to allow more time for public comment on, and further review of, the IFQ proposal's impact before taking final action. Thanks for your consideration of my views.

With best wishes,

Cordially,


TED STEVENS

11-26-91 03:00PM

FROM SENATOR MURKOWSKI

TO 313074662470

F002/003

FRANK H. MURKOWSKI
ALASKA

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SELECT COMMITTEE ON INTELLIGENCE (VICE CHAIRMAN)
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November 25, 1991

Rick Lauber
Chairman
North Pacific Fishery Management Council
411 Fourth St., Suite 20
P.O. Box 103136
Anchorage, AK 99510

Dear Rick:

The North Pacific Fishery Management Council is one of the success stories in the business of fisheries management. Its decisions have, almost without exception, been equitable, well-planned and significantly beneficial to the industry as a whole. The broad expertise in the industry represented on the Council is one of the most valuable of all our fishery resources.

I have always felt that it is best for those on the political side of fisheries issues to leave decisions in the Council's hands, and have strongly defended the Council's actions in many past cases.

I have no intention of altering that course now. At the same time, I feel that it is important to bring a recent phenomenon to your attention.

I have for some time been receiving an extraordinary volume of correspondence from Alaskans and others concerned about the Council's plans to impose an Individual Fishery Quota plan. Many of these writers have indicated they do not believe their views have been given adequate consideration.

The letters I've received express a wide variety of concerns. I have been particularly struck by three that seem to be shared by most writers:

First, that the Council's current implementation plan would cause significant social and economic disruption in coastal communities through the loss of perhaps thousands of crew berths, with the possibility that there would be subsequent disruptions including a loss of tax revenues, increased unemployment, etc., perhaps culminating in a significant population loss.

Rick Lauber
November 25, 1991

Page 2

Second, that there is a distinct possibility that it will lead many participants to land fish in fresh markets outside Alaska, rather than to land their catches in Alaska ports. This, too, would create a disruption of the economic fabric, if it proved true.

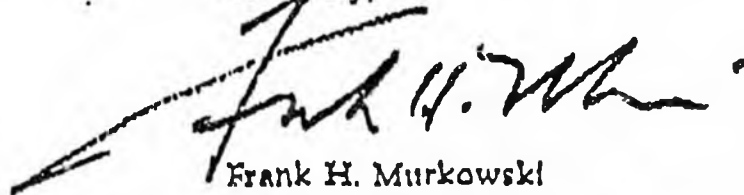
Third, that the costs of implementing the IFQ program would prove prohibitively high, and that it will be very difficult to ensure comprehensive enforcement.

A variety of other issues have also been raised, ranging from concern that it will be very difficult for any non-shareholder to move into shareholder status, to worry about the economic impact on service businesses. I'm sure you have heard all these expressed many times before.

I cannot evaluate all these charges; that is the Council's job alone. I can speak with some knowledge only on the issue of funding. Candidly, this issue concerns me, because the budgetary environment would be extremely difficult if a significant increase were needed to cover implementation, administration and enforcement. Unless a system which could pay for itself were devised -- and that might require legislative changes -- the additional cost would in all likelihood have to be taken from existing programs.

Again, I want to emphasize that the purpose of this letter is solely to apprise you of some of the correspondence I have recently been receiving on this subject, and not in any way to urge the Council toward a specific action. Indeed, I trust that the Council -- in its normal exemplary fashion -- already will have examined all these factors in great detail, and is completely confident that its record will provide all the support necessary for whatever action the Council chooses to take.

Sincerely,



Frank H. Murkowski
United States Senator

DON YOUNG

CONGRESSMAN FOR ALL ALASKA

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House of Representatives

Washington, D.C. 20515

April 1, 1991

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The Honorable Fred Zharoff
Alaska State Senate
P.O. Box V
Juneau, AK 99811

Dear Fred:

Thank you for the copy of your letter to the North Pacific
Fishery Management Council regarding individual fishery quotas.
I appreciated hearing from you.

As you are aware, I personally do not believe in supporting
fishery management schemes that do nothing to conserve fish but
instead help line the pockets of attorneys. At the same time, I
believe that those affected by fisheries management should have a
voice in how management is to be carried out. If the Council
decides on the basis of support from affected fishermen that a
quota system is necessary, I will abide by the Council's deci-
sion. However, like you, I believe that the Council has to look
at a lot more information before making a decision.

Please continue to keep me informed of your views on this and
other matters.

Sincerely,

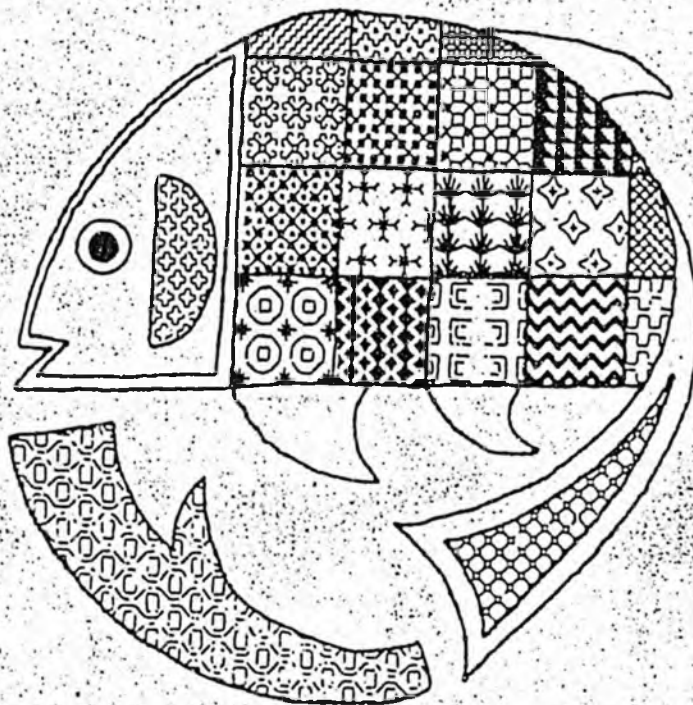
DON YOUNG
Congressman for All Alaska

DY:rmm



Magnuson Fishery Conservation and Management Act

As Amended Through November 28, 1990



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service

16 U.S.C. 1802

(12) The term "foreign fishing" means fishing by a vessel other than a vessel of the United States.

(13) The term "high seas" means all waters beyond the territorial sea of the United States and beyond any foreign nation's territorial sea, to the extent that such sea is recognized by the United States.

101-627

(14) The term "highly migratory species" means [species of tuna which, in the course of their life cycle, spawn and migrate over great distances in waters of the ocean.] tuna species, marlin (*Tetrapturus* spp. and *Makaira* spp.), oceanic sharks, sailfishes (*Istiophorus* spp.), and swordfish (*Xiphias gladius*).*

* The bracketed definition is in effect for section 102 until 1/1/92, and is then deleted; the underlined definition is in effect for other sections.

(15) The term "international fishery agreement" means any bilateral or multilateral treaty, convention, or agreement which relates to fishing and to which the United States is a party.

101-627

(16) The term "large-scale driftnet fishing" means a method of fishing in which a gillnet composed of a panel or panels of webbing, or a series of such gillnets, with a total length of one and one-half miles or more is placed in the water and allowed to drift with the currents and winds for the purpose of entangling fish in the webbing.

(17) The term "Marine Fisheries Commission" means the Atlantic States Marine Fisheries Commission, the Gulf States Marine Fisheries Commission, or the Pacific Marine Fisheries Commission.

101-627

(18) The term "migratory range" means the maximum area at a given time of the year within which fish of an anadromous species or stock thereof can be expected to be found, as determined on the basis of scale pattern analysis, tagging studies, or other reliable scientific information, except that the term does not include any part of such area which is in the waters of a foreign nation.

(19) The term "national standards" means the national standards for fishery conservation and management set forth in section 301.

101-627

(20) The term "observer" means any person required or authorized to be carried on a vessel for conservation and management purposes by regulations or permits under this Act.

(21) The term "optimum", with respect to the yield from a fishery, means the amount of fish--

(A) which will provide the greatest overall benefit to the Nation, with particular reference to food production and recreational opportunities; and

(B) which is prescribed as such on the basis of the maximum sustainable yield from such fishery, as modified by any relevant economic, social, or ecological factor.

TITLE III -- NATIONAL FISHERY MANAGEMENT PROGRAM

SEC. 301. NATIONAL STANDARDS FOR FISHERY CONSERVATION AND MANAGEMENT

(a) IN GENERAL.--Any fishery management plan prepared, and any regulation promulgated to implement any such plan, pursuant to this title shall be consistent with the following national standards for fishery conservation and management:

98-623

(1) Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.

(2) Conservation and management measures shall be based upon the best scientific information available.

(3) To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.

(4) Conservation and management measures shall not discriminate between residents of different States. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (A) fair and equitable to all such fishermen; (B) reasonably calculated to promote conservation; and (C) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

(5) Conservation and management measures shall, where practicable, promote efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.

(6) Conservation and management measures shall take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches.

(7) Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.

97-453

(b) GUIDELINES.-- The Secretary shall establish advisory guidelines (which shall not have the force and effect of law), based on the national standards, to assist in the development of fishery management plans.

97-453, 99-659, 101-627

(b) DISCRETIONARY PROVISIONS.--Any fishery management plan which is prepared by any Council, or by the Secretary, with respect to any fishery, may--

(1) require a permit to be obtained from, and fees to be paid to, the Secretary, with respect to--

(A) any fishing vessel of the United States fishing, or wishing to fish, in the exclusive economic zone or for anadromous species or Continental Shelf fishery resources beyond such zone;

(B) the operator of any such vessel; or

(C) any United States fish processor who first receives fish that are subject to the plan;

(2) designate zones where, and periods when, fishing shall be limited, or shall not be permitted, or shall be permitted only by specified types of fishing vessels or with specified types and quantities of fishing gear;

(3) establish specified limitations on the catch of fish (based on area, species, size, number, weight, sex, incidental catch, total biomass, or other factors), which are necessary and appropriate for the conservation and management of the fishery;

(4) prohibit, limit, condition, or require the use of specified types and quantities of fishing gear, fishing vessels, or equipment for such vessels, including devices which may be required to facilitate enforcement of the provisions of this Act;

(5) incorporate (consistent with the national standards, the other provisions of this Act, and any other applicable law) the relevant fishery conservation and management measures of the coastal States nearest to the fishery;

(6) establish a system for limiting access to the fishery in order to achieve optimum yield if, in developing such system, the Council and the Secretary take into account--

(A) present participation in the fishery,

(B) historical fishing practices in, and dependence on, the fishery,

(C) the economics of the fishery,

(D) the capability of fishing vessels used in the fishery to engage in other fisheries,

(E) the cultural and social framework relevant to the fishery, and

(F) any other relevant considerations;

(7) require fish processors who first receive fish that are subject to the plan to submit data (other than economic data) which are necessary for the conservation and management of the fishery;

(8) require that observers be carried on board a vessel of the United States engaged in fishing for species that are subject to the plan, for the purpose of collecting data necessary for the conservation and management of the fishery; except that such a vessel shall not be required to carry an observer on board if the facilities of the vessel for the quartering of an observer, or for carrying out observer functions, are so inadequate or unsafe that the health or safety of the observer or the safe operation of the vessel would be jeopardized;

North Pacific Fishery Management Council

Richard B. Lauber, Chairman
Clarence G. Pautzke, Executive Director

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July 19, 1991

Dear Reviewer:

Enclosed is a draft Environmental Impact Statement/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EIS/RIR/IRFA) of proposed individual fishing quota management alternatives for the halibut fisheries in the Gulf of Alaska and Bering Sea/Aleutian Islands. This document was reviewed by the Council at their June 24-29, 1991 meeting and approved for public distribution.

The Council requests that anyone having additional information pertaining to the amendment, its alternatives, or the draft EIS/RIR/IRFA, submit it to the Council during the 45-day public comment period which commences August 2, 1991. All new information will be summarized and included when possible in the final documents. Written comments should be received in the Council office no later than 5:00 p.m. (ADT) on September 16, 1991.

The Council is also asking for the opinions of the fishing community and other affected individuals regarding which alternatives the Council should approve. It is hoped that the draft analysis will help the public provide meaningful and constructive feedback to aid the Council in their deliberations.

At their September 23-27, 1991 meeting in Anchorage, the Council will make their final decision on whether to submit the amendment and supporting documentation to the Secretary of Commerce for implementation. The Council will accept oral testimony at the September meeting; however, such testimony should be limited to clarification of earlier written comments and recommendations about the Council's choices rather than submission of new information.

2.1.5 Stock Assessment and Status of Stocks

IPHC uses four principle sources of information for annually computing stock biomass: (1) landings tickets, obtained from fish processors, which provide information on the commercial catch by area; (2) logbook data, supplied by commercial fishermen, which provide information on the fishing effort associated with a given catch by area; (3) otoliths, obtained by sampling the commercial catch, which provide information on the average weight at age of individuals in the catch as well as providing the age composition of the catch; and (4) tag recoveries by fishermen and fish processors, which provide information on fish migration.

Estimates of the exploitable biomass are computed using the four sources of information indicated above. At present, estimating stock biomass is a complicated process involving three estimation procedures that reflect different levels of statistical sophistication and a variety of biological and statistical assumptions. However, the basic principles underlying the three estimation procedures are quite similar and are expressed in two ways: how the catch is related to population abundance within a given year, and how population abundances are related between years. The age composition of the catch reflects the age composition of the stock after adjusting for gear selectivity, differences in catchability among areas, seasonal and regional changes in fishing effort, and fish migration.

The total exploitable biomass of Pacific halibut in 1990 was estimated to be 235 million pounds coast-wide. This is a decrease of about 8 percent from the 1989 estimate of 256 million pounds, continuing the decline in biomass which began in 1987. Although the biomass remains close to historically high levels, the downward trend observed in abundance is consistent with long term cycles that has been observed in abundance for this population. Table 2.1 summarizes coast-wide estimates of exploitable biomass, removals, and exploitation rates for 1977 to 1990.

The annual assessment includes all removals from the stock. In addition to the commercial fishery, significant removals occur due to bycatch mortality, the recreational fishery, and waste in the commercial fishery of halibut caught and killed on abandoned or lost setline gear. Since 1984, halibut fishermen have attempted to maximize their fishing opportunities by setting more gear during a fishing period than they can retrieve before the period closes. Other fishermen inadvertently lose gear during fishing, either from gear conflicts with other fishermen or due to chafing and snagging with the bottom. The fish which remain on the lost or abandoned gear die, so this wastage must be included in the accounting of total removals from the population. Estimates of these other sources of removals are shown in Table 2.1.

2.1.6 Bycatch

Pacific halibut are caught inadvertently in fisheries targeting on various finfish and shellfish species and estimates of this incidental catch indicate that the removals are substantial. IPHC is supplied with estimates of bycatch in the groundfish fisheries off Alaska and the Pacific coast by the U.S. National Marine Fisheries Service (NMFS) through the Observer Program. Bycatch estimates for the Canadian trawl fishery for groundfish are supplied by Canada's Department of Fisheries and Oceans (DFO). Estimates of bycatch in other fisheries are generated by IPHC staff from information collected on research surveys or through predictive models.

Table 2.1 Summary of Pacific halibut exploitation data, 1977-1990. Biomass and removals are shown in millions of pounds (*net weight*).

Year	Exploit. Biomass	Removals				Total	Seline Expl. Rate	Total Expl. Rate
		Comm. Catch	Bycatch Mort. ¹	Sport Catch	Waste			
1977	132.8	21.9	18.1	0.3	0.0	40.3	0.16	0.30
1978	141.2	22.0	18.9	0.4	0.0	41.3	0.16	0.29
1979	150.1	22.5	23.7	0.6	0.0	46.8	0.15	0.31
1980	159.7	21.9	29.1	0.8	0.0	51.8	0.14	0.32
1981	174.9	25.7	22.9	1.1	0.0	49.7	0.15	0.28
1982	194.7	29.0	19.0	1.3	0.0	49.3	0.15	0.25
1983	219.8	38.4	16.6	1.7	0.0	56.7	0.17	0.26
1984	240.8	45.0	15.5	1.9	0.8	63.2	0.19	0.26
1985	263.0	56.1	11.5	2.7	1.6	71.9	0.21	0.27
1986	273.3	69.6	13.3	3.4	3.2	89.5	0.25	0.33
1987	274.6	69.4	17.3	3.6	4.2	94.5	0.25	0.34
1988	271.0	74.6	22.7	5.2	3.5	106.0	0.28	0.39
1989	256.0	66.9	21.1	5.8	3.4	97.2	0.26	0.38
1990	234.7	61.2	27.8	6.0	3.3	98.3	0.26	0.42

¹Long term yield loss.

Historically, halibut bycatch mortality was relatively small until the 1960s, when it increased rapidly due to the sudden influx of foreign fishing vessels off the North American coast. The total bycatch mortality peaked in 1962 at about 25 million pounds. Bycatch mortality declined during the 1960s, but increased to about 20 million pounds in the early 1970s. Bycatch mortality dropped to a 13 million pound level during the late 1970s and early 1980s. By 1986, the bycatch mortality declined to 7 million pounds, the lowest level in recent history. However, bycatch mortality has increased since 1986, reaching 17.4 million pounds in 1990. The increase has occurred despite the termination of foreign fishing off Alaska and is attributed to increased mortality in the fully domestic groundfish fisheries, particularly in IPHC Area 4 (the Bering Sea/Aleutian Islands region). Estimates of the bycatch mortality for 1977-1990 are shown in Table 2.2 by IPHC regulatory area.

Most halibut that are incidentally caught are injured to some degree during the capture process. However, not all fish which are returned to the sea die, so the bycatch mortality is less than the actual catch. The likelihood of a halibut being killed during incidental capture depends upon the fishing operation. Mortality in trawls with long tows (> 1 hr), large catches (> 5 mt) and slow sorting (> 30 minutes on deck) is very high, approaching 100 percent. Trawling operations that transfer the trawl codends to a mothership for processing also exhibit mortality rates close to 100 percent, as the sorting process is very slow and the catches are usually large (> 5 mt). Mortality in short trawl tows (< 1 hr) with small catches (< 5 mt) and quick sorting (< 30 minutes on deck) has been estimated at 50 percent. Bycatch mortality associated with setline gear is believed to be about 16 percent, as the fish are usually released with minimal damage to the jaw. However, the use of hook strippers in the setline fisheries for sablefish and Pacific cod may result in a higher mortality rate. Mortality in crab pots is high, approaching 100 percent, according to research cruise data. Groundfish pot fisheries have been assumed by the Gulf of Alaska Plan Team to possess a 12 percent mortality rate, based on limited data from 1987-1989 ADF&G observers.

It is very difficult to make precise estimates of the effects of bycatch on the commercial-sized component of the halibut stocks because bycatch is largely made up of younger migrating halibut. Growth, mortality, and migration greatly complicate the estimation procedures. If the same age composition occurred in both fisheries one could consider the bycatch removals as merely increasing the directed removals. Migration rates of juvenile halibut are not well known, so the impact of bycatch of juvenile halibut from specific areas on adult populations in those or other areas must be made estimated indirectly.

Bycaught halibut are generally smaller than those harvested by the directed fishery. Consequently, factors such as maturity, reproductive capacity, survivorship, and growth substantially affect stock productivity. By allowing small halibut to remain at large for a longer period of time, a net gain in stock biomass occurs due to the greater cumulative gain in individual weight relative to losses incurred due to mortality. Smaller fish are less likely to be reproductively mature, and have less reproductive capacity. Those harvested earlier in their life history not only contribute less in terms of short term yield, but they also contribute less to the maintenance of future stock biomass or to future yields. Bycatch losses affect recruitment, future catch, and future reproductive potential of the stock.

IPHC's approach for compensating the stock for bycatch losses is to reduce the harvest in the commercial fishery such that the reproductive potential of the exploitable component of the stock would be the same after bycatch as it would have been if bycatch had not occurred. The compensation factor was determined to be one mt of catch limit reduction for each mt of bycatch mortality.

STOCK ASSESSMENT AND FISHERY EVALUATION REPORT
FOR THE
1991
GULF OF ALASKA GROUND FISH FISHERY

Prepared by
Gulf of Alaska Groundfish Plan Team
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

November 1990

463-3043

Section 4

SABLEFISH

by

Jeffrey T. Fujioka

4.1 INTRODUCTION

The sablefish (*Anoplopoma fimbria*) resource in the northeastern Pacific Ocean extends from northern Mexico to the Gulf of Alaska, westward to the Aleutian Islands, and into the Bering Sea. This resource has been harvested by U.S. and Canadian fishermen since the early 1900's, but catches were relatively small and generally limited to areas near fishing ports from California to southeastern Alaska until expansion of foreign fleets began in the late 1950's.

4.2 CATCH HISTORY

Annual catches in the Gulf of Alaska averaged about 1,500 metric tons(mt) in 1930-50, and exploitation rates remained low until the Japanese longline fleet expanded into the Gulf of Alaska. Catches rapidly escalated during the mid 1960's until the record all-nation catch from the Gulf of Alaska reached 37,500 mt in 1972 and averaged about 28,000 mt in 1973-76.

Evidence of declining stock abundance led to significant fishery restrictions from 1977 to 1985, and total catches were reduced substantially. Catches in 1978-83 averaged 9,206 mt in the Gulf of Alaska and have increased steadily since then to 29,903 mt in 1988. In 1989, the reported domestic landings totaled 27,699 mt.

Table 4-1. Annual catch (mt) of sablefish in the Gulf of Alaska from 1977-1990.

year	Foreign	Domestic		Total
		JVP	DAP	
1977	15,961	0	1,179	17,140
1978	7,128	0	1,738	8,886
1979	6,885	18	3,447	10,350
1980	6,138	20	2,384	8,542
1981	7,976	0	1,941	9,917
1982	5,645	1	2,910	8,556
1983	4,966	27	3,761	9,002
1984	1,108	528	8,594	10,230
1985	38	226	12,215	12,479
1986	1	45	21,568	21,614
1987	0	180	26,145	26,325
1988	0	36	29,867	29,903
1989	0	0	29,842	29,842
1990	0	0	25,701	25,701

4.3 CONDITION OF STOCKS

4.3.1 Relative Abundance

Since 1978 Japan and the United States have cooperated to survey sablefish in the Gulf of Alaska with longlines. The survey area is stratified by depth and two indices of population abundance are computed: catch per effort in numbers weighted by respective strata areas to produce a relative population number (RPN) and catch per effort measured in weight multiplied by strata areas, to produce a relative population weight (RPW) (Sasaki, 1986). Strata areas used by Sasaki (1986) include areas away from the continental slope, such as gullies, not actually sampled by the survey. RPW's computed by Clausen and Sigler (1989) using only strata areas along the continental slope, while more conservative, are better substantiated.

Since 1987 the Alaska Fisheries Science Center has conducted an annual longline survey (referred to as the domestic longline survey) designed to continue the time series of the Gulf of Alaska portion of the Japan-U.S. cooperative survey. In addition to sampling the continental slope habitat, the domestic survey also conducts sampling in the major gully areas of the Gulf. RPW's obtained by the two surveys are shown in table 4-2 for depths 201-1000m.

Table 4-2. Sablefish abundance index values (1,000's) for the Gulf of Alaska from the Japan-U.S. Cooperative Longline Survey as computed by Clausen and Sigler (1989) and the domestic survey (Zenger and Sigler, 1990).

Year	<u>Cooperative</u>		<u>Domestic</u>			
	<u>Slope</u> RPN	RPW	<u>Slope</u> RPN	RPW	<u>Gullies</u> RPN	RPW
1979	223	651				
1980	203	537				
1981	255	671				
1982	365	987				
1983	347	953				
1984	369	1,011				
1985	467	1,456				
1986	471	1,437				
1987	428	1,370				
1988	483	1,503	420	1,409	248	750
1989	398	1,356	346	1,247	353	1,106
1990	302	1,035	416	1,448	297	918

The population has increased significantly since 1979, with major increases occurring in 1982 and 1985. These increases have been attributed to recruitment and growth of the 1977 and 1980 year classes. The indices decreased slightly after 1985, and indicated an increase again in 1988. Both surveys indicated a decrease on the slope from 1988 to 1989 to pre-1985 levels, but the two surveys differ considerably from 1989 to 1990. The cooperative survey indicated a significant decrease continued in 1990, while the domestic survey indicates a significant increase in 1990.

Table 1.--Catch (t) of sablefish (Anoplopoma fimbria) in the Gulf of Alaska by nation, 1958-87.

Year	United States		Canada	Japan	Other*	Total
	Domestic	Joint venture				
1958	698	0	98	0	0	796
1959	1,048	0	52	0	0	1,100
1960	1,925	0	217	0	0	2,142
1961	866	0	31	0	0	897
1962	684	0	47	0	0	731
1963	881	0	109	1,819	0	2,809
1964	1,172	0	238	1,047	0	2,457
1965	1,047	0	194	2,217	0	3,458
1966	1,067	0	335	3,777	0	5,179
1967	946	0	199	4,998	0	6,143
1968	161	0	128	14,759	0	15,048
1969	301	0	72	19,003	0	19,376
1970	578	0	68	24,497	0	25,143
1971	367	0	15	25,228	0	25,630
1972	1,086	0	16	35,558	843	37,503
1973	1,245	0	10	27,264	167	28,686
1974	1,111	0	10	24,176	3,038	28,335
1975	1,557	0	16	22,072	2,450	26,095
1976	1,151	0	23	21,924	4,640	27,738
1977	1,179	0	3	14,350	1,608	17,140
1978	1,738	0	1	6,458	669	8,866
1979	3,447	18	0	5,919	966	10,350
1980	2,384	20	0	4,831	1,307	8,542
1981	1,941	0	0	6,910	1,066	9,917
1982	2,910	1	0	4,921	724	8,556
1983	3,761	275	0	4,334	632	9,002
1984	8,594	528	0	844	264	10,230
1985	12,215	226	0	30	8	12,479
1986	21,568	45	0	1	0	21,614
1987	26,145	180	0	0	0	26,325

*The U.S.S.R., Republic of Korea, Poland, Mexico, and Taiwan.

Sources: 1958-85--Fujioka (1987); 1986-87--Pacific Fishery Information Network (PacFIN), Pacific Marine Fisheries Commission, Metro Center, Suite 170, 200 SW. First Avenue, Portland, OR 97201.

December 2, 1991

Public Hearing on Sablefish and Halibut IFQs

9:07am

Council Members present: Hegge, Judith Freeman for Blum, Dyson, Alverson, Lauber, Mitchell, Tillion, Cotter, Kyle

9:09am **Michael G. Wiley, Seward.**

Been involved in fishery (halibut) since 1970 as a small boat fisherman. Would like to see an end to the 24-hour halibut fishery. Congratulates Council on action, but identifies shortcomings. Nothing to address sport fishing. In Seward and Homer guiding and fishing for halibut very important. Designated ports another problem. It is not reasonable for small boats to travel too far to deliver. Can't get rid of those delivering 1,000 pounds or less but plan structured that way now. Designed plan basically for sablefish and now imposing that on halibut fishermen. Big boats will be more efficient but this will harm small boats and take free enterprise out of the system. Make plan flexible.

9:16am **(Dave Flannagan responding to questions about primary port delivery)**

If you want to land outside state, have to clear through primary ports; tranship, will also have to do so; if want to ship in foreign commerce, through primary port; all other landings can be done through out state at any port; advance notice requirements will all be the same.

9:20am **Geo Plagenz Homer.**

Sect. 3.5, initial allocation and quota share; has submitted written testimony; presented for Council members' notebooks; (Great Expectations) Does support IFQs to safeguard biomass, reduce danger in fisheries, better product for consumer and better price for fisherman: problem -- all quota goes to owner; halibut fishery conducted now on a share basis; not fair or legal to give all fish to vessel owners just because it's easier to figure out. In order for vessel owners to own fish they would have to have paid tax, workers' compensation, etc. They have benefitted by not paying these. Doesn't believe they can have their cake and eat it too. Wants Council to amend the language of initial allocation to allow for the legal rights of crew and skippers.

9:26am **Warren Brown, City of Seldovia.**

17 years as a fisherman and a City Councillor. City Council passed a resolution stating please do not approve IFQs until economic analysis completed on coastal communities affected. Implementation of plan as stated would have a devastating effect. Inconveniences of selling in a non-primary port will make it difficult to sell the two canneries for sale now in Seldovia. Seldovia depends solely on fishing and processing. If any of that is taken, devastating to its economy. Fish & Game Advisory also voted in favor of the City Council's resolution. The IFQ program as stated is unacceptable. There are too many flaws in the proposal and it's not the answer yet. Bona fide crew member a joke. An alternative would be to keep qualifying years for vessels 89-90, with the same for a crew member and then maybe 6 months commercial fishing time. Don't keep deck hand completely out of it. Throw the bona fide crew-member provision completely out and let shares be sold on the open market. Estimates the small boat fleet in Seldovia could be cut by about 60%.

9:35am Commander Larry Hardwig Adak Naval Station

Two types of people on Adak, military and civilian. Period on island only two years. A lot of people stationed on island do fish commercially. Hope Council will change plan to accommodate Adak. Atka would receive a CDQ in area 4B, but Adak would not. Proposed that shares be allocated for two year periods. Not fair that those stationed on Adak in past, but no longer there would receive QS, while those there now would get none. 5th or 6th largest town in Alaska but they've never had a Council hearing there. The whole IFQ question is a surprise to them. They are not suffering from too many fishermen and congested grounds like other communities, they don't have too many boats.

9:42am David Wittmire, Homer

Long lining for 12 years for salmon and herring. Has questions on plan

1. p. 9, Section 2 discards. Don't understand why freezer long-liners are exempt.
2. p. 8, c(ii) leasing. Freezer/long-liners may sell shares for use in that category, but catcher boats may lease up to 10 percent. It appears there are two standards for the two categories. Curious why the different rules for the two vessel categories.

Jay Ginter noted that the implementation team noted the same discrepancy as far as discards were concerned. Mr Hegge stated that the matter was addressed at the last Council meeting and was left to the implementation team. Assumed that freezer long-liners would remain under a PSC cap. Mr Cotter stated that it was the Council's intention that freezer long-liners not be allowed to own QS or IFQs, and that they would have to discard. They can own sablefish QS and IFQs. Mr Hegge stated that leasing was prohibited by freezer long-liners because they were not owner operated, and it was the Council's intention to maintain the fleet as it has been operating.

9:50am John Woodruff Icicle Seafoods.

Council must consider downstream effects of its actions. He had four concerns as follows:

1. implementation plan not available long enough for adequate airing; more time needed to review plan and its impacts carefully;
2. enforcement and costs. Primary ports have increased coverage and some others may have none. Enforcement from fishing grounds will be virtually impossible, leaving potential for under-logging.
3. the percentage of fish caught and processed in Alaska by Alaskans will drop;
4. unclear whether IFQs and QS would stay with the long-line fleet or be available to other gear groups. Council should give more time and seek as much public input as possible before adopting a final version of the plan.

9:54am Stan Weikal, Mount Vernon, Washington

Individual vessel owner for 13 years. Opposed to privatization of the resource even though he would come out OK. Concerned about the short time available to review and comment. The two committees established by the Council did not have representatives of individuals, they were composed of "lobbying"

groups. Differentiation between those who own and lease boats. There is nothing to verify that waivers come from filers of fish tickets. This could be open to forgery, unless some definite means of determining who signed documents. Concerned that allocating by-catch to people in other fisheries and not passing on to those in directed fishery an amount of fish because they won't be discarding. Concerned about the leasing aspect as presently drafted. Cannot lease more than 10%. Many will receive small quotas that will not be feasible to use in some areas. Concerned about transfer of shares--i.e., his wife has been business partner but never worked on boat. Upon his death, the Quota Shares will not be able to be transferred to his wife. She will be precluded from running the business the way they would like.

10:00am Kevin Hogan

Own and operate own boat, since 1974. Small operation. Received plan 19 hours prior. Thinks implementation plan will create a large bureaucracy. Has four years College and he can't understand it. Believes fishermen will have trouble understanding the system. The use of past catch histories to determine quota will reward those who cheated. Concerned that halibut just added in to implementation plan, it should be addressed separately. Sablefish and halibut are two separate and different fisheries. Crew classification is objectionable should have opportunity to participate in the fishery. Traditional management such as gear limitations, area management, could be used instead.

10:20am Sylvia Ettefagh

Small boat fisherman out of Wrangell. totally opposed to allocating the resource, but something has to be done. Agree with the Seldovia testimony regarding small communities. Have been working in fisheries for 10 years to accrue enough to get a permit, mostly in salmon. Not in fisheries long enough to accrue quotas. If hadn't been for the halibut opening, they couldn't have made it this year. Need to provide for crewmen, too. Consider downstream effects. Those who have been trying to get into a fishery over the years are being left out.

10:25am C.K. Weaverling, Mayor, City of Cordova

Submitted written testimony. In case of Cordova fishermen, quota would be too small to be economically feasible. Others would be locked out completely; will affect employment, with downstream effects on community. Urge Council to consider more traditional management schemes. Cordova should get a CDQ. IFQs will create winners and losers. The losers will be small boat owners and those wanting to get into the fishery.

10:30am Donald C. Nesbitt

Small boat fisherman. Glad Council making decision, doesn't agree with it. Halibut and sablefish fisheries should be separated, not considered together. Basing qualifications on poundage is a problem for those like him who just started last year. He didn't get any fish, therefore not eligible. He does not believe that is right;

10:33am Laura Cooper, North Pacific Fisheries Protection Association

Submitted synopsis of testimony. Thinks it's impossible to implement and enforce this program. It cannot be fixed by fine tuning, it should be thrown out. Does not believe it can be implemented and enforced for \$4 million per year. Commander Kyle has stated that some parts of the system are unenforceable. Excludes large number of fishermen--crewmen, they could be included and required to prove their participation, same as owners. Thinks the proposed system violates the Magnuson Act. Wants to see everyone treated fairly and equitably. System is likely to annihilate the small boat fleet. It is structured so that bigger boats with financial backing will be able to buy shares and small boats forced out. Believes 75 percent of quotas will change hands in a short period. This is economic engineering to protect those who have. Also financial backing will come from foreign investors. Putting quotas into foreign control defeats

purpose of Act. The plan will devastate local Alaska communities; and related business and services. Need social impact assessment. The last SEIS was 2-3 years ago, with an update earlier this year. Major response to IFQs is negative and the Council needs to address this. Need to rationalize fisheries, but this particular program has too many flaws. Throw it out and immediately impose a moratorium and stringent management techniques to buy time, then review quotas with use it or lose it provision, auction, etc. A full SEIS should be prepared for each management proposal and then put out for public review. There are less radical and more equitable programs available. It has been rumored that those Council members voting for IFQs are doing so because of a link with the inshore/offshore issue. It is believed that members have to vote for this proposal in return for an inshore allocation. Believes if vote for this, will confirm that Council system is not working.

[Applause]

10:44 am Jim Eastwood

Petersburg vessels and crew member for 12 years. In favor of the IFQ plan. Only plan to solve wastage of the resource. He does have some concerns. These include:

1. in the case of crewmen who have been on board vessels, poundage should be taken from fish ticket landings.
2. the cost of the plan is going to be expensive. He believes the estimates contained in the plan are naive. Residents of Petersburg willing to pay a fish tax to cover administrative costs. He sees difficulties with the next two years. He believes a moratorium should be instituted immediately.

10:48am Stanley H. Mack, Mayor of Sand Point.

Submitted a resolution with regard to the IFQ program. Sand Point in similar situation to Cordova, Seldovia, and other small communities. Appreciates Council's efforts. Sand Point is a fishing community; there are not other resources there to depend upon. Fishing supports their economy, through taxes on fish. This is also relied upon for capital improvements. Pride at being able to keep up their education system. Only boat owners who have participated personally should get Quota Shares. Fishermen need to seek a year round operation. This will deny them that flexibility. Also, one of the benefits of the system has been seen as the provision of fresh fish all year round. He is not sure that canneries will want to remain open to process this fish all year.

10:57am Anna Borland, Homer

Fished 10 years, long lining halibut 8 years. When started in halibut fishery, thought she would be able to work her way up in fishery. Will be precluded from doing this under plan because of crew-member definition. She has risked her life on deck, but will get nothing out of it. All she has ever done is fish, and this plan will prevent her from continuing. Believes in preserving the industry, but not this way. Thinks there are other ways to preserve fish, such as trip limits, big and little boat quotas, spread season over summer when weather is good and gear restrictions. Urges Council to change definition of bona fide crew member and allow someone who has been in the industry to buy into system. Also make quotas non-transferable, with unused shares going into a pool for re-allocation to new people. A quota share a right to fish, not a right to sell the right to fish to somebody else.

11:02am Steve Hoag, representing the IPHC

Supports IFQ program. Thinks it will solve many problems in the fishery. Has technical comments regarding implementation. Largest concern is that of monitoring and funding for monitoring. Accurate catch statistics are critical to their work, and monitoring may be difficult. IFQ program means longer seasons and burden on data collection programs. Supports exemption of halibut long-line fleet from PSC. Think there will be lower by-catch rates with this program. If not, return to PSC limits. Re, exemption of freezer long-liners - don't see it as a serious problem. Supports having some sort of PSC limit for freezer long-liners as well as an incentive program to eliminate the perception that they're being allowed privileges.

11:10am Mako Haggerty, Homer

Fished halibut for last seven years. Doesn't like IFQ program. Doesn't think it's an equitable program or addresses the issues that should be addressed. Bona fide crewmen definition will eliminate a lot of people who have participated in the fishery. Believe the costs will be prohibitive especially for those who have to buy into the program, or those who receive very small quota shares. If conservation is the aim of the system, it has been negated by the freezer long-liner category. p. 9 C(iii) of the plan, concerning hired skippers should be deleted. Does not believe there should be two classes of people created in the halibut fishery. High-grading is a problem. Need an economic impact analysis for communities. He thinks the Council could have gotten away with implementing black cod IFQs, but since they added halibut they are experiencing widespread opposition.

11:17am Bill Kaltenecker, Cordova

Fished for eight years. Worked every year to increase the quantity and quality of fish they delivered. If allocate IFQs based on what he did three years ago, will not be able to meet present day costs. Cordova will not survive if this plan is introduced. Most people are against the system because it does not allocate quotas fairly. Resources should be allocated fairly to those who are in the industry.

11:21am Brad A. Kimberlin Fairbanks

Few fishermen in Fairbanks. Started in skiffs in 1984, building up their participation. Now have three boats. Under plan, may as well sell up. By putting halibut in with sablefish will force all small boats out of industry. Suggestions:- anyone with fish ticket landings should get a minimum quota with an additional amount for each year fished; crew classification is unacceptable. Current program favors out-of-state owners. Don't want the whole fishing industry ending up in Washington. Small coastal communities will suffer if this plan goes ahead. Vessel classification is a problem. A 54 foot boat is under 60 feet, but this is very different from a very small boat.

11:27am Paul Lints, Kasilof

Represent small boat fleet. Been halibut fishing for 13 years. Small boat fleets and small communities will be adversely affected if this plan is implemented. System isn't geared for small boats. Something has to be done; but this program is not for small boat fleet. Thinks projected costs of implementation and enforcement are projected too low; the cost will be passed onto the fisherman. There is no "small boat" category; they can't go out to fish during inclement weather like the 60 foot boats in the same category. Economic impact analyses of affected communities should be done.

11:32am Paul K. Seaton, K. N. S Marine, Anchor Point

Has two boats over 60 feet. Wants sablefish and halibut to be allowed to be harvested by pots in the Gulf of Alaska. Submitted comparison of fisheries by pot and long-line. IFQ plan does not solve the problems it

purports to solve. There are other ways, such as the use of alternative gear.

11:37am John Rate, Homer

Fished salmon for 20 years, with 14 in halibut. Wishes to re-iterate comments of previous speaker. There are alternatives to IFQs, need compelling reasons to do this. Submitted August issue of National Fisherman with photo on cover. Shows what has happened under salmon limited entry. More than 40 percent of salmon fishermen having trouble meeting loans. Same will happen in halibut fishery. Learn from history, no such thing as a stable fishery. People crash as stocks fluctuate. This is the nature of the beast.

11:42am Shari Gross, HANA

35 companies represented in the group, both big and small, up and down the coast. HANA is an integral part of the industry. Troubled with proposal. Major concern is for the resource and the impact on health of stocks. IFQs pose a serious threat to the resource unless monitoring and enforcement is tight, which is costly. Plan will cause transportation delays resulting in even lower quality fish. Remote places like Hoonah will have to pile fish up until there is enough to justify transportation. The regulations are unworkable for processors. Can't imagine how data will flow from remote locations. Not in favor of IFQs, but if it must be, at least it should be a well thought out and designed system with 100 percent enforcement. The program should protect small coastal communities, and not discriminate between Alaska, Washington and Oregon.

11:49am Bill Dignon, Hoonah Cold Storage

Hoonah is 50 miles west of Juneau. It is 100 percent U.S. owned, and processes 2.5 million pounds of sablefish and halibut. Submitted letter objecting to IFQs on the basis that there was not enough time to review plan. Believes monitoring and enforcement will be inefficient and expensive. Hoonah is a small boat community which will lose out under this plan. It would be handicapped by not being a primary port. They are seeking the designation of Hoonah as a primary port.

11:53am Terry Barry, Manager, Hoonah Cold Storage

Same comments as previous testimony. Plan leaves a lot of questions unanswered and unclear, don't think it's the time to implement, more study is required. The plan will not only affect Hoonah Cold Storage, it would affect the whole town. Believes quotas will migrate out of the hands of small fishermen. Hate to see fishermen lose their livelihood.

11:56am Questions to Dave Flannagan from Mr Cotter.

Is it true that fish cannot be unloaded at a primary port?

Mr Flannagan replied: There is no difference between a primary port and a non-primary port. Both need six hours advance notice. Fish received in Hoonah would only have to go through a primary port if it were involved in foreign commerce.

11:59am lunch

1:16pm reconvene

1:18pm Larry Powers, Kenai

Would lose about \$350,000 investment in last 3 yrs under this program. Has fished halibut since 1978 until 1984. Because of the safety factor, need larger boat. Feel larger boats have had an advantage for quite some time. After brother drowned, began investing in a larger boat. 1989 buying halibut license year after year, but between 1984 until the present trying to get bigger boat. Still in process. Has not bought any gear yet. Concerned about his children, how will they get into fishery? Fish belong to everyone who wants to fish for them. Quota program good one, but everyone should have same amount. Should file for quota by certain day every year and fish for them during a certain time every year.

1:23 Matt Donohoe, Sitka

Fished for six years. Representing people who feel they have not had their point of view represented before the Council. Submitted petitions with over 200 signatures from people involved in the fishing industry. Also submitted Sitka resolution (No. 9147) requesting the Council not to approve IFQs. Have not had a public hearing in Sitka or the South east for years. Public process has not been adequately followed because there has not been adequate information available. The plan was only available in the last week, and people have not had time to digest it and comment. Council doesn't realize that plan has potential to destroy the economic base in the coastal communities. A social and economic study needs to be done on what this plan will do to their economic base specifically, not in general.

1:30pm Buck Laukitis, False Pass Fish and Game Advisory, City of False Pass

Read letter from Mayor of False Pass. They would likely be eligible for CDQ. They have been expanding the dock to assist in getting into groundfish, and development of current fisheries. IFQ plan not acceptable unless acceptable CDQ plan is incorporated. Current CDQ provisions in plan not acceptable because IPHC area 4A is not included at this time. All waters in BS/AI should be included. Still too many questions to be answered and inappropriate to vote on it at this time.

1:34pm Howard Pendell, Sitka

Some current concerns center around migration of IFQs into a few hands and larger boats. His suggestion to allay this concern is to tie initial QS allocation to a permit. A person would be allowed to buy and fish one more permit. This would allow for upgrading through the sale of a lower value permit, and the purchase of a higher value one. This would be like a multi-tiered limited entry system. Guarantees the diversity of the fleet and addresses the concerns of small communities. Guarantees are also there for larger vessels.

1:40pm Linda Behnken, ALFA

Thinks the implementation plan goes a long way in working out questions and concerns of various groups. One reservation they have, section 2F(2) allowing trawlers to purchase IFQs for halibut; they want it removed. This is a fixed gear fishery, and trawlers shouldn't be included in the plan. Unless fleet can be assured they can harvest their IFQs without the PSC cap there will still be a race for fish. Mortality will be reduced without race for fish. It is essential that the Council make that commitment to the fleet. Discards for which IFQ not held should be allowed. Generally speak in favor of plan. Like to see work groups continue their work.

1:46pm Charlie Spud, Nunivak Island Fishermen's Association.

Representing over 1,000 fishermen in their villages. Main concern has to do with the proposed CDQ program. Prefer a strong CDQ program, as described in Council preferred alternative. For halibut management, continue to receive 50% of catch limit for Area 4B as CDQ. Current poundage is not enough

for development in their area. CDQs were seen as a way of helping the communities get into fishing.

1:54pm Steve Tvenstrup, Kenai

Been in fishing since 1978. In 1986 purchased a Cook Inlet permit. He estimates he would get 10,000 pounds, but most of the money from this would go to enforcement. Does not want to get paid and watch the grass grow, like from Exxon. Just started black cod last year.

1:59pm Ed Fuglvog

Support IFQs and urge Council to move ahead with implementation of plan.

2:00pm Brian L. King, Cordova

Salmon and herring fisherman. Has problems with limitation on transferability. IFQ holders can buy salmon or herring permit, but salmon or herring permit holders cannot buy QS. IFQs can work as a management tool without restricting their sale. Only restriction on transferability should be that buyer be a U.S. citizen.

2:03pm James Swift, Sitka

Congratulate Council on work so far. Original idea was to reduce fleet in an overcapitalized fishery. Need an IFQ program. Needs to be done as soon as possible. There are more salmon boats coming into sablefish and halibut fishery this year. One concern is Section 2F(2) regarding by-catch for draggers and pot fisherman under a by-catch program. Doesn't think that is needed.

2:05pm David O. Osterback, Sand Point

Third-generation fisherman in long-line and other fisheries. With Peninsula Marketing Association. Current system involves death and damage to people and vessels. Management system needs to be changed but do not agree with current plan. A lot of unknowns. No opportunity to review the implementation document thoroughly. Concerns are:

1. small boat fleet would just about be eliminated from Halibut fishing - quotas will be too small to warrant participation. (boats up to 50 ft);
2. QS will be too expensive for Alaska residents to buy.

Believe small communities should get preferential treatment in all fisheries. Not allowed fish shrimp, tanner crab or king crab in our own area. IFQs as presented here is not a solution. Council should establish a committee of halibut fishermen from all areas to develop a plan.

2:10pm Alvin D. Osterback, Aleutians East Borough. Peninsula Marketing Association

Reiterate comments above. Set aside a portion of fishery to area where residents of area will fish. If continue with plan as is, will create a class of large-boat fishermen.

2:35pm Will Tillion

Submitted a card only, "please vote yes on IFQs."

2:36pm Drew Sparlin Southcentral Longliners Association

Fished from age of ten. Current problems formed by greed. Fishermen able to overcome problems, but not possible to have a viable business under IFQs. Fishermen able to solve problems without bureaucratic involvement. Small guy without financial backing cannot survive. Plan needs to be reassessed in the context of the resource not how fishermen will benefit or how to cut them out. Pot fishery good idea. Tier method is great. Don't remove opportunity. Please continue efforts, but more in resource conservation mode.

2:46pm Jeff Stephan, United Fishermen's Marketing Association

Like to have public hearings immediately adjacent to Council deliberation. Draw attention to need for a Social Impact Analysis on this issue. Council needs to be fully aware of the social impacts before taking action. Draft implementation plan does include most of the issues needing clarification, but many matters are policy issues the Council needs to address. Continue to be opposed, but social impact assessment necessary if Council plans to go ahead.

2:52pm Charlie Johnson, boat owner

Sablefish, Crab, Pacific Cod fisherman from Kodiak. If this plan goes through, he might receive a good windfall, but not in favor of IFQs. Need impact studies regarding the impact on coastal communities. Believes coastal communities will shrivel up and die. There are a lot of other options which could be considered prior to this type of plan.

2:54pm James E. Phillips

A lot of things in implementation plan he doesn't like but a lot of things he does like. Doesn't satisfy everyone's needs, but neither did the Magnuson Act. Invited the Council to go ahead and implement the plan, please.

2:55pm Jerome Selby, Mayor of Kodiak Borough

Kodiak Borough stands opposed to concept of IFQs. Sees no conservation advantage from the plan, and the economic devastation of Alaskan coastal towns. System not in accord with Magnuson Act. Will cost a lot to implement. Create privileged class of fishermen and deny access to others. Quotas end up in overseas control through financial control. 72 percent of salmon permits are not owned by Kodiak Island residents. Thinks IFQs would be even worse than this. Should be no vested interest on Council -- suggest none of them or families should be eligible for quota shares. Table issue until April, publish changes, hold public hearings in April before going any further with policy.

3:03pm Drew Scalzi, North Pacific Fisheries Association, Homer.

Although their association endorsed plan, they still have concerns. The vote was 58 percent in favor. This reflects the level of concern. Participated in implementation team and feel the group put aside personal thoughts and worked on the issues at hand. Concerns:

1. Bona fide crewman, intent is great, but in halibut fishery it will penalize those who work toward eligibility and reward those who

- falsify records;
2. also section 2F(2), door could conceivably be opened for trawl to buy long-line IFQs. If this is possible, take it out.
 3. Still endorse 32 foot boat class to keep small boat fleet intact.

Believe work groups should continue.

3:07pm Steve Fish

Has been fishing halibut since 1975 and black cod since 1979. A vote not for IFQs is a vote for the status quo which stinks. Happy to pay implementation costs, and happy to buy Quota Shares. Plan is not perfect, but nothing is. Council has been working on this program for a long time, those who come up at the last minute have not followed the process and don't understand all the ramifications. Critical to maintain the combined implementation team/group to continue working into implementation. The other concern - by-catch provision for trawlers, take it out.

3:10pm Kris Norosz, Petersburg Vessel Owners Association

Association been in existence since 1930s. Witnessed all year fishery reduced to 24 hours. This is economically and ecologically disastrous. Industry participation is crucial in developing management regime. The implementation plan has helped to clarify many of the questions and problems. Still believe IFQ best solution to problems facing industry. Imperative that adequate enforcement, violators vigorously prosecuted and stiff penalties. There is no difference between primary ports and secondary ports, and the difficulty in selling salmon canneries in Seldovia is a result of the salmon market and poor performance. The transition into IFQs must be thorough, and should be done for 1994. Bareboat charter agreements section needs to be expanded. Agree that with IFQ system in place there will be no need for PSC limits, Council needs to clarify whether all permit holders have bona fide crew member status, and halibut fishermen in over 10 years but not qualified. Feel the trawl by-catch provision is inappropriate and suggest it be removed. Hope Council passes IFQs at this meeting.

3:17pm Ron J. Kuczek, Anchorage

This is first appearance before Council. Amazed at decisions Council has made in name of conservation. IFQs is worst yet. Sablefish and halibut plan before council blatantly against conservation. Develop a program which does not discriminate. Addressed a number of comments to the Secretary of Commerce. Cited conflicts of interest. An in-depth analysis is required to determine impacts.

3:24pm Rick Weber, False Pass commercial fisherman

Fished since 1977. Three aspects of concern: Social and economic, implementation costs, and qualification determination. Social/economic impacts of the plan will devastate many coastal communities in this state. Many rural coastal communities have developed through open access fishery. Oppose this plan, not specifically IFQs. Need social impact analysis. Vessel ownership is an irrelevant criteria for initial allocation.

3:29pm Jere Murray, Seldovia.

Seldovia Native Association is opposed to halibut and sablefish plan as presented. Eliminate many of those in Seldovia and limit upgrading. Seldovia Village Tribe, opposed as presented. Need to participate in CDQ program. Personal comments: concept of bona fide crew member be removed from plan completely; remove the 1983-90 participation -- go back to 84. To ensure that fishing power not be concentrated, lower

QS cap especially in 3A/3B to 1/10 of 1%. After initial allocation, let free enterprise system work. Immediately implement an alternative plan to eliminate derby and spread fishing throughout year.

3:38pm Nancy Lande, South/Central Alaska Long-line Enterprise

Represents a small boat organization of vessels 38 feet and under. Majority are in halibut fishery. Haven't had enough time or opportunity to comment on the plan. A plan of this magnitude deserves a one-on-one meeting in their own community. Need clarification of the freezer long-line exemption on by-catch, and where they fit in under definitions. Do halibut fishermen need sablefish IFQs for by-catch? Stressed halibut fishery is different from sablefish, they want the opportunity to work with the Council on specifics of halibut management, not have it lumped in with sablefish.

4:07pm Jack Hill

26 years in fishing. Statement that halibut will be available year round is incorrect. IPHC has asked for four or five month closure of the fishery. Costs of implementation too high. Plan flawed in who will qualify for shares, e.g. can crew of halibut boat for three years and not qualify, but fish for shark in Florida for four months and qualify? Should fix the flaws now before going any further. Sablefish and halibut are two different fisheries. Should be addressed separately. Teams should have more time to address the issues.

4:11pm David T. Wenzlau, Juneau

Been a crewman for 12 years on black cod and halibut vessels. Crew are back bone of industry, and should be included. Oppose transferable permits. Boat owners should not get all quota. If the present plan is implemented, there will be a loss of crewman. The Council's actions do not serve the public interest, they serve narrow sectional interests.

4:14pm Chris Moss, Homer

Although in favor of IFQs, current plan needs some changes. Crewmen should be included in the system. IFQs for by-catch in trawl fisheries should be removed. Quota in 3A and 3B should be valid for either area. When the TAC in one area is reached it should be closed, with the balance available in the other area.

4:17pm Neil Huff

Fishing sablefish for 15 years. In favor of IFQ plan. High time something was done. Not looking forward to having to participate in present saturated fisheries.

4:18pm Beth Stewart, Peninsula Marketing Association, Aleutian East Borough.

Representing fishermen on Aleutian Islands. While opposed to the scheme have tried to be constructive. Still cannot support. Program will result in lost revenues to communities because more fish will be landed outside their communities which rely on fish taxes. Enforcement is a problem. The system invites abuse. Vessel owners will be rewarded, not those who actually fished. The program removes the ability for communities to rely on the sea for livelihood and survival.

4:21pm Leroy Cabana

Owner/operator of a 45 foot vessel. System far too complicated. Council has tried to please everybody, but plan works to advantage of large processors and large companies. No-one will get a large allocation, and will have to buy quotas. Not fair in market because having to compete with large companies with money.

4:26pm Tim Cabana

Operates, 54 foot vessel. Too many questions about current plan. Too complicated. Something needs to be done, but this isn't it.

4:29pm Bill Sullivan, Homer

Limited time to review plan and to discuss with other fishermen. Plan says it aims to create minimum disruption, but it could destroy the industry. Fished halibut since 1981 but won't qualify as a bona fide crewman, yet salmon fishermen can qualify. Allowance should be made for small boats in the system. Strongly opposed to this system of IFQs.

4:36pm Margaret Salmon

Speaking on behalf of crew members who have worked their way through to owning their own vessel. They will not qualify as bona fide crew members. Women and natives will not be able to purchase quota unless they can borrow money. IFQs will not protect most small boat owners. Socio/economic impact has not been studied. This needs to be done prior to implementing the plan. All agree something must be done, but the up and coming young have no say in how this thing is being developed.

4:41pm Paul Clampitt

In favor of the plan. Been working on the program now for ten years. Current plan not perfect, nothing will be, but nothing insurmountable that could not be corrected. Tired of fishing in any weather that comes up during an opening. Cannot enforce what is happening now. Crew will lose jobs with trip limits. Can allow crew to buy into system, so they can have ownership.

4:46pm Thorn Smith North Pacific Long Line Association

Unable to obtain copy of plan to read thoroughly. Attended meetings of implementation groups in Seattle and got impression that enforcement and monitoring would be complicated. Don't know what it will cost, and where the money will come from. Freezer long-liners will be out of the system because of limits on transferability. Sablefish and halibut are two distinct fisheries and should be treated as such. Opposed to this particular system. Should design a system which is simple with free transferability. Would recommend a moratorium in the meantime. These comments related more to Pacific cod than the halibut or sablefish.

4:54pm Per Odegaard

2nd generation halibut fisherman. Safety is a major factor. Time to do something. The proposed system is not perfect, but there are still good reasons for it. The number of injuries per year has risen dramatically. This is clearly the result of the derby style of fishing. It is time to get on with it.

4:56pm Mark Lundsten, F/V Masonic

Think the document is good, despite typing and spelling errors. Covers questions well. Proofreading needed. Continuing the two committees and the holding of public meetings are good ideas. Question of the lifting of PSC is a tricky one. Overage and underage needs to be looked at. Overage could be deducted from next years catch. IPHC is a conservative organization, if it says it can make the system work, then that is a vote of confidence. The CDQ program is good. Should be flexibility in bare boat charter provisions. The idea from Sitka has some merit and is worthy of consideration.

5:02pm Eric Olson, Jack Knudsen Fishing Vessel Owners Association

[Eric Olson] Owner/operator for 8 years, fishing for 23 years. Easy to tear the system apart. Haven't heard anything new today. Have heard that conservation not taken care of. Without plan - no conservation. At least with plan there is a chance. The plan is designed to preserve the structure of the fleet, the status quo won't do that. Vessels will have to diversify into other fisheries. It is time to get on with it.

[Jack Knudsen] Can support 1 year moratorium on PSC, but still thinks will need to do something like quarterly by-catch limits in the future to avoid a race for fish. Favors an even more restrictive bona fide crew member definition. Like to see crucifiers legalized for halibut again. Better trained observers would be able to tell if crucifiers being used too harshly.

5:12pm Jack Crowley, Fishing Vessel Owners Association

Long line fishermen are operating 2 - 3 days without sleep. This is no way to run a rail road. If the Council has any feeling for its fellow man, put the system in place. Currently getting fresh Canadian fish all year round, but it is not as good as Alaskan fish. All the fresh fish is a result of the Canadian ITQ program. Alaskan fish is available for a few days.

5:16pm John Crowley, Fishing Vessel Owners Association

Everyone opposing system today had little participation. If these people get in, those with a long history of participation will lose out. In favor of ITQ system. Hope the fishery can be preserved.

5:18pm Bruce Forde, Deep Sea Fishermens Union

Fishing since 1965. Have been writing to Council to preserve open access so I could buy boat. But have now changed my mind. Too many boats. IFQs along with a provision that you have to be on board the vessel should keep quotas in the hands of the industry.

5:20pm Bruce Jackson, Deep Sea Fishermens Union

Union established in 1912, with 304 members. Most frightening concern is status quo. Urge Council to put system to Secretary of Commerce.

5:21pm James Herman

Agrees with quota on halibut. Bad weather prevented his fishing full day from 1987 - 1990. 1991 good weather, but no halibut in Cook Inlet. A quota based on a three year catch would not be good. On the whole the scheme is good, may get cheaper insurance rates because of improved safety. Hope to be able to pick a day of good weather when can make money.

5:24pm Brian Harber, Deep Sea Fishermens Union

Eight years since the halibut moratorium crashed in Washington DC. The issue of the cost of implementation is not an issue. Fishermen will pay the cost. Believes a bureaucratically managed fishery is better than no fishery at all. Members won't get anything out of this other than the right to fish the species from which they make the majority of their income. Support bona fide crew member provision, freezer long-line split, and ownership cap.

5:31pm Jerald D. Eidem

Attended last meeting and presented comments, will continue at this meeting. Support IFQs, but need an additional allocation to Cook Inlet fishermen to take account of bad weather and the Exxon oil spill. Have three daughters who have fished with him, but who do not qualify under the definition of bona fide crew members. May need a CDQ for Cook Inlet. May need 50 percent CDQ for women. Hopes it is not true that people with under 1,000 pounds will not be able to participate.

5:36pm Chris Chavasse

Resource is a common stock. There is no data west of the international date line The subsistence issue is not addressed. In the estimates of funding, nothing is included for educating fisheries managers and those in the industry.

5:39pm Pete Farris:

Against IFQs at this stage. Plan seems far from perfect. Plan needs to be re-worked a lot. Against plan the way it is, but not against IFQs per se.

5:42pm Robert Newman, King Cove

Had 30 years fishing in King Cove. Also King Cove Council Member. Oppose IFQs. Concerned younger generation will not be able to participate. The system will create bankruptcies. Heard the decision on IFQs had already been made. Concerned about this given expense of travelling from King Cove.

5:45pm Don Bridges, Kenai

Against present plan. Too complicated. Sablefish and halibut are two separate and distinct fisheries.

5:46pm Vic Horgan, Ocean Beauty Seafoods

IFQs are a catch-22 between resource protection and something that can be afforded. Any system must be able to be monitored and enforced adequately. This program will result in losses to the State of Alaska. It favors other States over Alaska. The Canadian system requires more money, and Alaska has more boats and more fishermen. Advocates licence limitation with use it or lose it trip limits. Urges Council to reject program now and move on.

5:50pm Paul Grønholdt, Sand Point

Everyone he talked to in Sand Point is opposed to IFQs. It is poor policy. There is no money for monitoring

and enforcement. It is unAmerican, it is management from Hell.

5:51pm Linda Kozak, Kodiak Long-line Vessel Owners Association

Provided written comments. The Magnuson Act places conservation first. Believes high-grading will occur. The IPHC recommends 5 percent for overages, but what about sablefish? Sees difficulties in allocating ABC under an IFQ system. Fish stocks may shift. Under an IFQ system there is pressure to hold TACs at higher levels. The restrictions imposed in the plan could lead to inflexibility. The provision for an owner to be on board is OK, but could run into difficulties with corporations or partnerships. Feels Council needs legal opinions on this. Restrictions on transferability should be dropped. Any-one who wants to buy quota should be able to do so. Implementation cost of \$4 million is too conservative. IPHC has said that it is not happy with the monitoring and enforcement proposal. Based on Canadian and New Zealand experience, believe \$10 million more realistic. Concerned at concerted push for IFQs. Need to step back and examine program before moving forward. Wants to know why social impact analysis not completed.

6:00pm Marty Phelps

Opposed to IFQs. Further work needs to be done.

6:01pm Lloyd Cannon, All Alaska Seafoods

46 years fishing. Against IFQs. Been involved in 5 or 6 fisheries which have cycled down and up. Would have been bankrupt if couldn't have switched sideways. Under IFQs, in a few years everyone will be broke. Under IFQs people cannot switch sideways. IFQs would disenfranchise a lot of young people in Alaska. If there are too many people let some of them go broke. Let the capitalist system work.

6:06pm Linda Behnken, personal behalf

Wish to lend strong support to the Sitka proposal of allocations of blocks of quota, and having them tied to permits. Have seen the IFQ issue polarize the industry in Sitka. Believes this measure will ensure added support. Not new, raised three years ago, and again nine months ago. System would prevent quota accumulation as some fear. Fleet will remain diverse. Will ensure entry level will be able to be maintained. Will simplify the system. Vessel classes will become less relevant. Would like the Council to discuss this idea seriously.

6:09pm Adjournment

**KODIAK LONGLINE
VESSEL OWNERS' ASSOCIATION**



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HALIBUT • SABLEFISH • PACIFIC COD • CRAB

November 29, 1991

Mr. Rick Lauber, Chairman
North Pacific Fishery Management Council
Anchorage, Alaska

SENT BY FAX: 271-2817

RE: SABLEFISH AND HALIBUT IFQ IMPLEMENTATION

Dear Chairman Lauber,

The KLVOA has participated in the IFQ discussions for several years. We have been very involved and interested in this issue. It is of great concern to the members that they have had almost no time to review the draft implementation plan. It was received in our office on Tuesday, November 26, 1991 and the deadline for comments is November 29, 1991. As you know, this week was the Thanksgiving holiday. It seems that the rush to have something approved is not allowing industry the time to review plans for implementation of this very complex and controversial program.

We have some initial comments and concerns that I will attempt to summarize and briefly address. These are listed below.

CONSERVATION

In order to achieve the goals of the Magnusen Act, it is important to consider conservation of the resource first and foremost. While we believe that initially some conservation concerns were addressed in developing the concept of an IFQ plan, it has long been forgotten.

It is a known fact that highgrading and underreporting will occur. It is unclear as to what extent this will be. There is a halibut size limit, but the industry work group has recommended that no size limit for sablefish be established. What amount of discards will result from this?

The IPHC is recommending that overages be handled in such a manner that each vessel would receive 5% less on his halibut quota initially and that the overages would be deducted from his "bank". Why is a sablefish "bank" not being considered? In fact, this whole idea of "banks" is something that industry has not had an opportunity to review and comment on. Many fishermen are concerned that every time they turn around, another "little percentage" of quota is being deducted from their quota.

We have commented previously that the political pressure on the Council could make it difficult for any quota reductions to be implemented, should the stocks decrease. One issue that has not been addressed adequately is the anticipated shift in stocks from one management area to another. In the Gulf of Alaska 1992 Stock Assessment Summary (sablefish portion) it states that there could be a problem in apportioning ABC's under an ITQ program. The reason is that ITQ's will be area specific and stocks will shift and change from time to time. This could result in a shift of stocks from one management area to another and if the scientists wish to adjust quotas to compensate for the shift, there may be tremendous political pressure from the quota share holders in the area which will receive a reduction. This could be a serious problem. In fact, it appears that such a shift may be happening in sablefish from the Southeast areas to the Central Gulf. This could become extremely contentious and political.

In the 1992 SAFE document it states for sablefish that "under a pessimistic recruitment level and constant catch at the recommended ABC's, the population as projected by the SRA model, would fall below the 1980 biomass level in 1994". In looking at what the 1980 quota was, it is very concerning that this number (8,542 mt) is significantly lower than the projected quota for 1992 of 20,800 mt. It is important to note that under an IFQ plan, there may be tremendous pressure to keep the stocks at an artificial level, thus causing conservation problems.

PLAN RESTRICTIONS

OWNER REQUIRED TO BE ON BOARD - In requiring the owner to be on board the vessel, the Council is attempting to resolve the concern of large scale corporate investment and a "sharecropper fleet". The current corporate and partnership vessels are grandfathered in to allow them to operate with a hired skipper. Any change in corporate or partnership structure requires the owner to be on board the vessel. What constitutes a change? Could it be a simple additional investment by one or more partners, changing the % of ownership? How can you force a partner not to get out of the corporation, if he wants to? Are these restrictions even legal? We think that the Council needs to have some sound legal guidelines when dealing with corporate law.

CAPS APPLY TO VESSEL - This restriction will provide a disincentive for crew members to purchase quota and try to fish on a high producing vessel. If the owner already has his cap and that entire quota will be fished on the vessel, then no one else can fish their quota on that boat. What if an owner's vessel sinks or burns? He will not be free to lease or try to fish his quota on the vessel of his choice. He will be limited to those vessels which don't have their cap. What if he has to fish on a vessel which is not seaworthy because of this restriction and what if he dies? This is an unfair and irresponsible restriction.

CAPS APPLY INDIVIDUALLY AND COLLECTIVELY - This restriction again, may have been well intended, but it falls short of being realistic in the "real world". If an individual owns interest in multiple vessels which are of themselves,

corporations, and his interest in these vessels exceeds the cap, then none of the corporations in which he has any level of ownership will be allowed to purchase quota. If he is forced to sell out of a corporation in order to allow the other owners more flexibility, then the grandfather clause doesn't apply anymore. The tax consequences could be devastating as well. This restriction must be eliminated.

CAP SUMMARY - The caps are not appropriate and will cause severe hardship to the participants. If caps are implemented, they should be less restrictive and allow more flexibility by the quota share holders.

PERMIT HOLDERS - The permit holders may not be considered bona fide crew members in order to purchase quota. This is not appropriate. Permit holders who have been running vessels for the halibut fishery should be able to purchase quota.

FIXED GEAR CREW MEMBER - Again, this definition is designed to restrict those individuals who can purchase quota. The Council has two definitions of what fixed gear is, and it is unclear as to whether the pot fisheries would qualify as fixed gear. It is very important that fishermen be able to purchase quota. Anyone who wishes should be able to purchase quota.

MANAGEMENT AREAS - There are approximately 60 management cells under the proposed sablefish and halibut IFQ plans. These include management areas, sub-areas, and vessel classes within each area. The ability for fishermen to exist within these cells will be very difficult, if not impossible. It would be more appropriate to reduce these cells by eliminating some management areas and vessel classes.

FREEZER/LONGLINER DEFINITION - There are a few vessels which have participated in the Pacific cod fishery with plate freezers on board, but have fished for halibut and sablefish as a catcher vessel. These vessels will be classed in the freezer/longliner category automatically, unless the Council allows some flexibility. These vessels must be allowed a one time choice to be in either the catcher boat or freezer/longliner category.

ANTICIPATED COSTS

Current estimates are approximately four million dollars. This is far too conservative. There is insufficient money allocated for the monitoring and transferring of quota shares. The IPHC has indicated that they are not comfortable with the level of enforcement. They feel it won't be enough to monitor the many small halibut deliveries. We agree.

In reviewing the Canadian and New Zealand programs, it is more realistic to project a cost of over ten million dollars annually. Where will this money come from? It is suggested that the industry will pay for this. Will the implementation wait for a change in the Magnusen Act to allow for this tax or user fee? How much of a fee will the industry support? If we don't wait for this change, then where will the money come from? Will existing programs be

cut, and if so, which ones? According to NMFS enforcement personnel, they need a substantial increase in personnel even without IFQ's. Will they get it? If not, how will IFQ's be affected? These "minor" details are extremely important and need to be answered before a decision is made by the Council.

INCONSISTENCIES

DISCARDS - The Council has in one place prohibited discards, yet does not require that vessels purchase IFQ's for incidentally caught fish. Having freezer/longliners removed from this restriction doesn't make sense. This doesn't seem to fit within the "keep what you catch" idea.

FIXED GEAR - The fixed gear definition seems to have two meanings. In one place it means hook and line. In another, it includes crab fishermen in order to qualify to purchase quota.

GRANDFATHER CLAUSE - There is some discrepancy in when the grandfather provision ceases for a corporation or a partnership. For a corporation, a death of a member does not constitute a change, but this statement doesn't appear to apply to partnerships.

SUMMARY

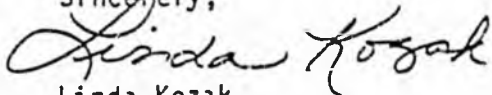
We are very concerned that the "push" for IFQs has superseded any common sense approach to the problems in the fishery. We need to step back and take a look at this program from all angles before a decision is made.

The idea of an IFQ program is to allow the most flexibility among those quota share holders, not to socially engineer the program in such a way that "nothing changes". In order to achieve what an IFQ program is designed to do, some changes need to be implemented. If not, then the exercise will surely fail. The analysis states over and over again that the benefits of the program will be reduced with each restriction imposed. It is believed by some that we have reached the point where the costs far outweigh any potential benefits.

The technical team and industry work group have not completed their work. There are many questions which remain unanswered, as well as Council clarifications on inconsistencies. Costs remain uncertain, as well as funding sources. The conservation aspects of this plan have not been adequately addressed. Again, we ask, why has a social impact analysis not been completed? The ramifications of this program will be far-reaching. It is imperative that an appropriate social impact analysis be completed.

We are asking that the North Pacific Council consider delaying final action on this plan until the concerns have been addressed. We feel that the Council has not completed the job on this issue

Sincerely,



Linda Kozak
Executive Director

NORTH PACIFIC LONGLINE ASSOCIATION
720 West Blaine St.
Seattle, WA 98119
(206) 283-7700

December 2, 1991

Mr. Richard B. Lauber, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99501

RE: Sablefish/Halibut ITQ Proposal

Dear Mr. Lauber:

Our association submitted comments on the above subject in September. Our views have not changed, and we would like to incorporate those comments by reference. Please consider the following summary:

I. The Purpose of ITQ Systems

Dr. William Fox, Assistant Administrator for Fisheries, NOAA, recently stated the purpose of ITQ systems: "We need to extricate the government as much as possible from the allocation process, moving...to programs that allow market forces to work effectively at the harvesting level."

II. This Proposal Defeats the Purpose of an ITQ System

The preferred alternative for the sablefish/halibut ITQ proposal contains so many restrictions and constraints that the market is severely inhibited. Chief among these is the prohibition against exchange of shares between vessel classes. At the recent Ninth Annual Fishery Law Symposium in Seattle, Dr. Lee Anderson, father of the surf clam/ocean quahog ITQ program, stressed the need for free transferability of shares. He stated that because of the numerous constraints on transferability, "The sablefish/halibut proposal is almost not an ITQ system."

III. Industry Does Not Support the Proposal

If an ITQ system is to work, it must enjoy the support of industry. Oral and written testimony on this proposal has been overwhelmingly negative. Fishermen and fishermen's associations, processors and their associations, catcher-processors and their associations, the IPHC, Alaska State Legislators, Congressman Don Young and Senator Stevens have all announced outright opposition to the proposal or have registered serious concerns about its feasibility. The

Advisory Panel split evenly on a vote to drop the subject permanently (i.e., "kill the rat"). Industry support for the proposal seems to come mainly from those who would enjoy a windfall profit through the allocation of shares.

IV. Precedent - Offshore Processors

Under the proposal the catcher-processor fleet is awarded very little quota in the fisheries, and is permanently prevented from acquiring more through the market - efficiency, product quality, and possible willingness to pay more for quota share notwithstanding. This scheme would set a frightening precedent for other fisheries.

V. Limitations on Ownership of Shares

Provisions limiting individual, collective and corporate ownership of shares are also troubling. Efficiency may require some consolidation. Further, the 1% and 1/2% limitations would set an impossible precedent for other fisheries, where single vessels often exceed such proportions of the catch (vessel catch limits raise the same concern). Some limits may be desirable, but the levels proposed are far too restrictive.

VI. Foreign Control

Concern has been expressed that despite limitations on ownership and other protective measures, foreign interests will find ways to control ITQ's.

VII. Implementation, Administration, Monitoring and Enforcement

Despite diligent work by the implementation teams it is apparent that implementation, administration, monitoring and enforcement will be extremely complicated. It is fair to ask whether NMFS has or can acquire the capacity to administer such a program.

VIII. Funding

It is also apparent that implementation, administration, monitoring and enforcement will be very expensive. The source of funding remains a mystery. There is no legal authority under the Magnuson Act to extract fees from industry. Who will pay, and how much?

IX. Future Extraction of Economic Rents

Establishment of an ITQ system will be an open invitation for the extraction of economic rents from the fisheries (one way to offset a windfall). Congressional attitudes and intentions in this regard should be considered

carefully before we commit to any such program and make our industry vulnerable to further fiscal burdens.

X. Environmental Impact Assessment; Cumulative Impact

Two separate and independent analyses of the impact of the sablefish and halibut ITQ proposals on the human environment have been prepared - each as though the other proposal did not exist. Has there been any assessment of the possible cumulative impacts of these two actions? Also, the environmental assessments are generic, intended to address the general impacts of all of the alternatives. Has a specific analysis of the preferred alternative been performed?

XI. Economic Impact Analysis; Cumulative Impact

Again the economic impact analyses were done independently, using incompatible methodologies, assumptions and data - and the actions were later combined. Is the cumulative economic impact different from the individual impacts? The analysis is also generic - will the public and the Council review a full analysis of the preferred alternative?

The Council has announced its intention to develop ITQ programs for all fisheries under its jurisdiction. This is a revolutionary proposal, and its components are all part of a single scheme. This privatization may well have an annual effect on the economy of \$100 million or more, and if the programs are designed after the sablefish/halibut proposal, they will certainly have an adverse effect on competition, productivity, and the ability of U.S.-based enterprises to compete with foreign-based enterprises in domestic or export markets. This overall plan should be subjected to thorough analysis under E.O. 12291 and the NMFS guidelines on fishery regulation - these analytical requirements should not be evaded through a fishery-by-fishery piecemeal approach.

XII. Community Development Quotas

The preferred alternative calls for the creation of sizeable Community Development Quotas (CDQ's), to be taken from fully-subscribed fisheries. It does not appear that there is any conservation rationale for this action, nor is it necessary "to achieve optimum yield" under Section 303(b)(6) of the Magnuson Act. For all practical purposes the CDQ's would create perpetual rights to public property, in certain Alaska coastal communities. Washington state coastal communities which are equally disadvantaged would be barred from applying. This intentional geographic exclusion may raise questions of impermissible discrimination.

Conclusion

We share the view of Dr. Fox that the primary purpose of an ITQ system is to extricate government from the allocation process, and to replace it with the market mechanism. The current sablefish/halibut preferred alternative does not achieve that goal - it is hardly an ITQ program, and would establish a frightening precedent. If the Council really favors the ITQ approach it should abandon this elaborate construct and design a simple program with freely transferable quota shares. Consideration should also be given to a plan for all fisheries, so that industry knows what to anticipate.

Thank you for your attention.

Sincerely,

Thorn Smith
Executive Director

Council asks for study of IFQ impact

by Hal Spence
Staff Writer

The Homer City Council Monday voted unanimously to pass a resolution asking the North Pacific Fisheries Management Council not to adopt an individual transferrable quota share system before conducting a thorough analysis of the economic impact such a system would have on Alaska's fishing communities.

The city council passed the resolution opposing precipitous action by the fisheries management council on the so-called IFQ (Individual Fishing Quota) proposal for sablefish and halibut. It also asked the fisheries council to share any information it gleans from an impact study with the coastal communities likely to be affected by a quota system.

In passing the resolution, introduced by councilwoman Cathy Godfrey, the Homer council followed other coastal cities and organizations who have passed similar resolutions, including Kodiak, Cordova and Whittier, as well as the Kodiak and Kenai Peninsula borough assemblies and the Alaska Municipal League.

At Monday's meeting, the council heard from local fishermen who showed up in numbers.

The fisheries council will take public comment on implementation of the IFQ proposal Monday at the Anchorage Hilton Hotel. The final vote is expected during the council's meeting, which begins Tuesday.

The adoption of IFQs will affect Homer's economy, said Homer fisherman George Plagenz. It could mean the loss of a significant number of jobs, if, as opponents of IFQs suspect, limiting shares to vessel owners will encourage owners to hire fewer crewman and turn human jobs over to machines, he said.

"(There are) glaring problems with the proposed assign-

ment of shares," he said. "It's illegal

"The management council would give 100 percent of the shares to vessel owners when they are, in fact, minority owners of the fish."

Plagenz said many vessel owners, especially those living Outside, don't pay Alaska taxes and haven't complied with the legal requirements to be considered employers because under the definitions, they are not employers, but contractors.

Plagenz said the management council represents large-vessel owners who stand to profit from the proposed assignment of shares. They do not, he said, represent the individual interests of fishermen. That, he added, was the position of bodies such as the Homer City Council.

If the IPO plan passes as currently written, Plagenz said, the owner would not be having his refrigerator fixed at Brian's Appliance (Councilman Brian Sweiven), or his back adjusted at Geoffrey Chiropractic, a reference to the office of Councilwoman Cathy Godfrey's husband.

Other fisherman offered similar testimony. But not everyone at Monday's meeting opposed IFQs. Drew Scalzi, president of the North Pacific Fisheries Association, an organization of Alaska fishermen, said he could refute much of the testimony about the possible effects of IFQs the city council had heard, but declined to do that Monday. He debated the issue at the Homer Chamber of Commerce luncheon Tuesday and again on KBBI's Coffee Table program Wednesday.

"This is a very complex issue," Scalzi told the city council.

The quota proposal has been discussed and debated for years, he said Tuesday evening. The council has entered the fray at the 11th hour, he said.

SPENCE

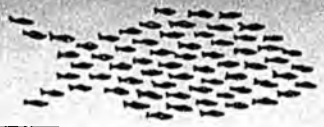
EFFECT OF LONGLINE ITQ SYSTEM VERSUS HARVEST BY POT ON THE SABLEFISH AND HALIBUT FISHERIES.

<u>Problem</u>	<u>Longline ITQ</u>	<u>Sablefish, Pacific Cod, Harvest by Pot Gear</u>
<u>Resource:</u>		
Juvenile halibut bycatch mortality	continuing	solved
Halibut highgrading of legal sizes	starting	solved
Ghost fishing of lost gear	continuing	Biodegradable strip and escape from pot tunnels
Discard mortality of incidental species	continuing	solved
Killer Whale interactions and mortality	continuing	solved
Steller Sea Lion interactions and mortality	rare but continuing	solved
<u>Safety:</u>		
Weather postponed retrieval of gear fish mortality	continuing	solved
<u>Market:</u>		
Season closure from halibut PSC	continuing	solved
<u>Economic Problems:</u>		
Concentration of wealth to few vessel owners	yes	no
Eliminates diversity options for local fleet	yes	no, with 100 pot limit
Elimination of local ports of delivery	yes	no
Reduction in local vessel and on-shore jobs	considerable job loss	no
Cost of implementation and enforcement	high	minimal, tags for pots, observers on large vessels
Volume of paperwork	high	minimal increase

EFFECT OF ITQ SYSTEM VERSUS FIVE TRIP LIMIT SEASON ON THE HALIBUT FISHERY

(Trip limits apply to entire quota, five 24 hr. trips, May through September. Under harvest or overage applied to next opening. Vessel classes percentages as per IPHC clean-up openings)

<u>Problem</u>	<u>Longline ITQ</u>	<u>Five 24 hr./Trip Limits</u>
<u>Resource:</u>		
Highgrading by size	starting	starting
More gear set than can be retrieved	solved	solved
Retention of other species	possible	possible
Tangling and loss of gear	solved	reduced
<u>Safety:</u>		
Weather	Can choose good days	Can choose more protected secondary grounds
Overload vessels with product	potential	no
Proximity of vessels for rescues	widely spaced	closer proximity
<u>Market:</u>		
Distribution of fresh product throughout year	solved	better than current
Product fresh upon delivery	no, long trips allowed	yes
Economy of scale: Volume processing and shipping	no	yes
<u>Economics:</u>		
Concentration of wealth to few vessel owners	yes	no
Eliminates diversity options for local fleet	yes	no
Elimination of local ports of delivery	yes	no
Reduction in vessel and on-shore jobs	considerable job loss	no
Cost of implementation and enforcement	high	low, current vessel classes
Volume of paperwork	high	minimal increase
Fishermen harmed under program	80% "consolidated" out of fishery	only highliners above average for vessel class



SYNOPSIS OF TESTIMONY ON IFQS FOR BLACKCOD AND HALIBUT
at the NPFMC Meeting, Anchorage, AK, December 2, 1991

We object to the implementation of the proposed IFQ system for the Blackcod and Halibut fisheries on the grounds that:

- 1) The issue of conservation of the resource has been ignored.
- 2) The program excludes the vast majority of fishermen.
- 3) The program will destroy the small boat fleet in favor of big money concerns.
- 4) The program will devastate many coastal communities and businesses.
- 5) The overwhelming majority of people concerned reject this program.

We propose that the Council instead recommend the following:

- 1) Throw this IFQ proposal out.
- 2) Impose a moratorium and some traditional management techniques.
- 3) Devise a comprehensive management program with several different alternatives.
- 4) Conduct a SEIS for the alternatives and distribute the information for public review, BEFORE you vote on a final plan.

The current IFQ proposal is bad public policy. What you vote for is going to set a national precedent for all fisheries. YOU HAVE AN OPPORTUNITY TO MAKE GOOD PUBLIC POLICY BY VOTING AGAINST THIS PROPOSAL AND FOR A MORE EQUITABLE AND FAR-SIGHTED PLAN.

CITY OF CORDOVA



December 2, 1991

Mr. Rick Lauber, Chairman
North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Chairman Lauber:

I am submitting comments regarding Individual Fisherman's Quotas (IFQ's) on behalf of the Cordova City Council. The Cordova City Council remains very concerned about the impacts an IFQ management scheme would have upon local fishermen, the economy of Cordova and the lifestyle of residents of Cordova. We are aware that you have received a great deal of testimony regarding the expected impacts upon individual fishermen; especially the small boat owners and those just getting into the longline fishery. Our comments will focus on the impacts upon small coastal communities like Cordova; communities whose economy is dependent upon the fishing industry. Following is a list of specific comments:

1. Cordova's economy has historically been based upon the seafood industry. The Exxon Valdez oil spill, world market conditions, and other factors have combined to produce hard economic times for many local fishermen. Local fishermen have always depended on flexibility and the ability to participate in a number of fisheries to make ends meet. Many have gotten involved in the longline fishery over the past decade. Most of these fishermen are small boat owners, but they have made substantial investments in longline gear and equipment and have been working hard to increase their catch each year. An IFQ system would hurt these fishermen because it would "lock" them into a quota. In most cases, this quota would be so small that they couldn't afford to fish it. The only rational economic decision for people in this position is to sell their quotas. Other fishermen who planned to get into the fishery or who have only fished it the last few years could be locked out completely. This means a loss of jobs and income and reduced revenue from raw fish and sales taxes.

2. Local processors have been gearing up to handle increased deliveries of halibut and black cod. If IFQ's go into effect, the likely outcome is that it will become uneconomic for the processors to handle these fish because deliveries from local boats will decline. Again, this translates into a loss of local jobs and a loss of tax revenue for the community.

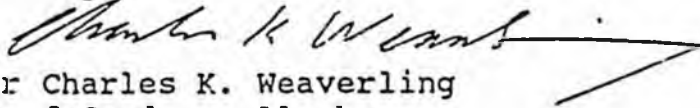
North Pacific Fisheries Management Council
December 2, 1991
Page 2

3. The Council has set aside Community Development Quota's (CDQ's) for disadvantaged communities in the Bering Sea. CDQ's are designed to prevent communities who have not yet participated in those fisheries from being locked out if an IFQ scheme limits access in 1993. Those longliners displaced by Bering Sea CDQ allocations will be given shares of the Gulf of Alaska quota. We have two comments about this. First, we believe that compensating longliners who are displaced in the Bering Sea with Gulf of Alaska shares is unfair to Prince William Sound Fishermen who are just getting into the fishery. This also has the effect of driving local fishermen out of the business because there will be less poundage available for harvest in the Gulf. Second, we would argue that Cordova should be eligible for a CDQ also since it has great potential to participate in the longline fishery but is likely to be locked out under the IFQ scheme. Cordova is just beginning to emerge as an important bottomfish port.

In summary, the Cordova City Council believes that an IFQ system will have very definite winners and losers. The losers will be small boat owners, people just getting into the fishery, and fishing communities like Cordova. We would urge the North Pacific Fisheries Management Council to look very closely at more traditional management schemes. We understand that management is necessary to protect the resource, to reduce waste, and to increase safety. However, we see no need to rush into an IFQ system; a system which has not yet proven itself in other areas of the world. For example, evidence from the east coast of Canada and New Zealand suggests increasing conservation problems, enforcement problems, and economic disaster for many inshore fishermen and the communities they live in.

Thank you for the opportunity to comment. Please contact us if you have any questions or need more information.

Sincerely,



Mayor Charles K. Weaverling
City of Cordova, Alaska

United Fishermen's Marketing Association, Inc.



P.O. Box 1035 Kodiak, Alaska 99615

Telephone (84-3453)



Mr. Richard Lauber, Chairman
North Pacific Fishery Management Council
c/o Portland Hilton Hotel

January 14, 1992

SENT VIA FAX #503-220-2565

Dear Rick,

We respectfully request that the Council take action at this January, 1992, Council meeting to withhold the submission of the Sablefish and Halibut Fixed Gear IFQ Management Plan for either NEPA Review or Secretarial Review until after the April, 1992, Council meeting.

We request that the Council take action at this January, 1992, Council meeting to direct the development and preparation of a Social Impact Analysis, a Cost-Benefit Analysis and an Economic Impact Analysis prior to the April, 1992, Council meeting.

We request that the Council take action at the April, 1992, Council meeting to reconsider their December, 1991, action regarding the Sablefish and Halibut Fixed Gear IFQ Management Plan, and that they either reaffirm or rescind such action based on the review and consideration by the public and the Council of in-depth analyses of Social Impact, Cost-Benefit and Economic Impact.

We do not believe that the Sablefish and Halibut Fixed Gear IFQ Management Plan package can be considered "complete" for submission for either NEPA or Secretarial Review until the above-suggested analyses are completed, reviewed by the public and Council, and considered by the Council.

We understand that the Council is preparing a new document that attempts to demonstrate the combined and cumulative effects of their December, 1991, action regarding the Sablefish and Halibut Fixed Gear IFQ Management Plan. We understand that the objectives of this new document are:

1. To combine the Revised Supplement to the DSEIS/RIR/IRFA for Longline and Pot Gear Sablefish Management in the Gulf of Alaska and the Bering Sea/Aleutian Islands ("Sablefish Document") with the DEIS/RIR/IRFA for Proposed Individual Fishing Quota Management Alternatives for the Halibut Fisheries in the Gulf of Alaska and Bering Sea/Aleutian Islands ("Halibut Document"), and
2. To include a minimal addition to community-related information that would attempt to address issues of economic impact.

We do not believe that the new document that is under development will adequately address the Social Impact issues, the Economic Impact issues or the Cost-Benefit issues that should be addressed.

Regarding the original Sablefish Document and Halibut Document that will form the basis of the above-mentioned new document that is currently under development, we do not believe that either of these Documents adequately address the Social Impact issues, the Economic Impact issues or the Cost-Benefit issues that should have been addressed prior to the December, 1991, Council action that adopted the Sablefish and Halibut Fixed Gear IFQ Management Plan.

Further, we believe that the Council should have postponed their final action of December, 1991, regarding the Sablefish and Halibut Fixed Gear IFQ Management Plan until the cumulative and combined effects of joining the Sablefish Document and the Halibut Document were analyzed, reviewed by the public and Council, and considered by the Council prior to the Council action that adopted such plan. We believe that the Council is backfilling their December, 1991, decision regarding the Sablefish and Halibut Fixed Gear IFQ Management Plan by developing the rationale for their action after the fact. We believe that it is improper for the Council to develop an analysis of the effects of their action after the fact, rather than before the fact. We believe that the Council did not properly weigh and consider an analysis of a combined Sablefish and Halibut Fixed Gear IFQ Management Plan prior to their December, 1991, action regarding such plan.

Sincerely,

Jeffrey R. Stephan

May 31, 1991

I am opposed to the IFQ system that is being discussed by the North Pacific Fisheries Management Council for Alaska's sablefish and halibut fisheries.

Supposedly there are not enough fish "to go around" and therefore IFQ's are the answer, allocate who can and cannot fish. If there are not enough fish, why isn't more being done to reduce massive bycatch levels? Why are IFQ's being rushed into, instead of stopping the draggers who legally land halibut as bycatch and then turn around and also land them in the halibut directed fishery, for example. The Magnuson Act states specifically that if bycatch can be reduced, this must be done.

One reason I suspect that the NPFMC is reaching toward IFQ's instead of tackling bycatch is the result of special interest groups who sit on the council and vote for themselves. Specifically 4 seats on the council are held by individuals who represent trawler and/or freezer longliners who are very much responsible for the large bycatch, and another 2 seats are held by those who represent Washington and Oregon state interests and therefore the lower 48 big boat constituency. Who represents the small business/local catcher boats, those who would most suffer the imposition of IFQ'S? With an Alaskan state governor who is more concerned with his own hotel's ability to garner fresh fish daily, rather than the livelihood of his constituents, I would venture to say nobody.

The Alaska Salmon Limited Entry is pointed to as a model of success, and I would agree that indeed this system is successful, however in all cases the boats are severely restricted by size, therefore putting all the fishermen on an equal footing. There is no similar equalization factor in the groundfish limited entry proposed by the NPFMC. There are options however, most of which severely penalize the younger boat owners who, after having worked years as crewmen, have only amassed enough capital in the last few years to buy their own boats, only now to be told they can't adequately utilize them. And if the IFQ's spread to other areas of the fishery, may never be able to use them. This is the beginning of the disenfranchising of a whole generation. What are those of us in the up and coming generation to do for a living, move to Washington or Oregon in order to get a fishing job, on a floating processor/slave ship, when the fish are right out our back door? Director William fox of the National Marine Fisheries Service (NMFS) has expressed a need to consider the human consequences, has he considered that in a community like Kodiak we virtually have no industry besides fishing?

It is worth noting that there didn't seem to be "not enough fish to go around" until the trawlers showed upon the scene, depleting the fish stocks and then in the face of increasing competition in their own class of boats decided it was time for IFQ's, and that quotas should be granted on the basis of "past

participation levels" that interestingly enough they have defined to be precisely those years that they first began to prosecute these fisheries, when stocks were still high, thus skewing the lions share of the quotas towards themselves. It doesn't take a genius to see the situation for what it is.

200 scientists have called for a moratorium, I say yes, give us a moratorium on the larger boats, they are the ones sucking up all the fish, and now want it legally deeded to them. The smaller catcher boats are quite willing to let the marketplace rule. Planned economies are difficult to justify.

Instead of IFQ's I would like to suggest that the NPFMC and more specifically its' parent organization the NMFS analyze the proven successful fisheries to discover and apply similar guidelines for Alaska's groundfish fisheries, and find the resources to stand up to the factory ships interests on the NPFMC that stand in the way of developing fair and equitable plans. These few corporate representatives should not be in charge of deciding the fates of thousands of Alaskan families.

Debra Lathrop

Debra Lathrop

Box 2796

Kodiak

Bill Young
Box 1929
Kodiak, Ak. 99615
(907) 486-8412

RECEIVED MAY 18 1991

Dear Sir:

I am opposed to the IFO system for managing the sablefish and Halibut fisheries. I have been fishing Halibut for Nine years hoping to someday have my own boat. If the IFO system is in effect I will lose my ability to enter the fishery along with every other captain or deckhand who has worked hard to start their own operation. The only people who will benefit will be the large corporation (Japanese, Norwegian, etc.) and the individuals who are already well established. The very same open-entry, free enterprise system that enabled today's successful fishermen to get started will be closed to anyone getting started today.

Thank You,
Bill Young

Mr. Cauber,

I am opposed to the IFQ system for managing any bottomfish resources. The coastal communities and Alaskans as a whole will suffer greatly from IFQ's. IFQ's will consolidate the state's bottomfish resource into a few corporate entities. IFQ's have been unsuccessful in other countries and it won't work in Alaska. Instead of dividing up the resource the management council should instead, focus its energy on saving our bottomfish from the extinction it now faces. By the time IFQ's are in place there will be no bottomfish left. As an Alaskan I'm opposed to IFQ's.

Sincerely,

Peter D. Devaris
Kodiak, AK

4/26/91

To: NPFMC
FROM: Dennis Smedley Jr.
1718 Simeonof
Kodiak AK 99615

This letter is written to voice my resentment of the allocated 590 halibut by catch. While listening to the news I was awestruck when I heard that under the IFQ system the trawlers would be allocated 590 to resell bycatch.

Now, why am I mad? Because I have been a crewmember for 5 years and wish to own my own boat after college. Even though I have fished halibut many times, I would be allocated nothing.

If the system is set up to let bycatch halibut be sellable, then druggers would target halibut. This would be done while the life time Alaskan Resident who wants to fish has an entry cost so high it is un economical!

It's going to be whatever you want, so I wish you would take that 5% & throw it out. Thank you for reading this & remember that my future is in your hands.

Sincerely,
Dennis Smedley Jr.

**KODIAK LONGLINE
VESSEL OWNERS' ASSOCIATION**

326 CENTER AVENUE, P.O. BOX 131
KODIAK, ALASKA 99615
(907) 486-3781 FAX (907) 486-2470

HALIBUT • SABLEFISH • PACIFIC COD • CRAB

May 17, 1991

Senator Fred Zharoff
ALASKA STATE LEGISLATURE
P. O. Box V
Juneau, Alaska 99811

Dear Fred,

The members of the Kodiak Longline Vessel Owners' Association are concerned about the proposed individual fishing quota (IFQ) system for sablefish slated for decision by the North Pacific Fishery Management Council at their June meeting in Anchorage. The Council is scheduled to address an IFQ plan for halibut at their September meeting in Anchorage.

Attached are a few concerns with the privatization plan for our fisheries. We believe that the Alaskan fishermen, coastal communities and virtually all areas of the state will be adversely affected if the IFQ plans are implemented.

We have talked with the Governor's Special Fisheries Assistant, Clem Tillion. He assures us on one hand that our fears are unfounded. However, we do agree on one thing. Clem has indicated that he is concerned, along with ourselves, that he won't be able to control the long-term results of a privatization plan. We believe that once this "Pandora's Box" is opened, the state will be powerless to protect the coastal communities and the thousands of fishermen who currently depend on these resources for their livelihood.

We are asking that the Council provide some answers to a few simple questions before implementing a plan. First, define the plan and provide an adequate social impact analysis. Secondly, provide a detailed implementation, administrative and enforcement plan, along with realistically projected costs.

The people of this state shouldn't accept the "trust us" philosophy that some Alaskan Council members are promoting. We need to ask the tough questions and demand that we receive some answers.

We need the help of our elected leaders. Please have your staff conduct some research on this. The North Pacific Fishery Management Council has made available the draft analysis for public review. The public comment period for

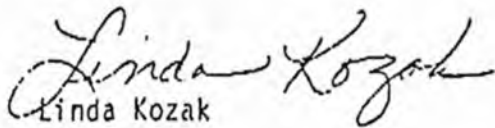
May 17, 1991
Page Two

the analysis is open until June 14, 1991. We have already conducted an extensive review of the proposed privatization plan and would be happy to give additional information regarding our concerns.

If you feel, as we do, that this may be the biggest fisheries mistake for Alaska, we would appreciate your active involvement. Write a letter to the Council and, better yet, be able testify in Anchorage at their June meeting.

If you have any questions, or require clarification on any of the concerns addressed, please don't hesitate to contact our office.

Sincerely,


Linda Kozak
Executive Director

Enclosure



HALIBUT • SABLEFISH • PACIFIC COD • CRAB

CONCERNS WITH PROPOSED IFQ SYSTEM FOR SABLEFISH

1. **THE PLAN:** First of all, there is no plan. There are a lot of different options which provide several completely different scenarios. The Council needs to propose a "preferred plan" which can then receive industry review and critique.
2. **SOCIAL IMPACT ANALYSIS:** As with any drastic management change, there will be winners and losers. It is imperative that an analysis be prepared which will realistically show what the effect will be on fishermen from different areas and the coastal communities involved. No such in-depth analysis has been completed.
3. **RESOLVING CONSERVATION PROBLEMS IN FISHERY:** The conservation problems currently in the fishery will not be solved by this type of drastic management change. In fact, even the Council draft analysis points out that the likelihood of discards from highgrading and underreporting (black market sales) will likely increase. Serious conservation concerns could result from fishermen discarding large amounts of fish in order to sell the highest valued species and "under the table" sales.
4. **SAFETY CONCERNS:** Some say that safety of fishermen will be increased by the implementation of IFQs. This is false. There are scores of alternative methods of dealing with the safety concerns of compressed fisheries that do not entail the drastic changes of an IFQ system. Fishermen will still lack flexibility due to other fishing efforts such as salmon, herring and crab.
5. **HALIBUT BYCATCH CONCERNS:** There is a halibut cap for longliners in the Gulf at present. In 1990, the bycatch cap was reached and the entire Gulf closed to longlining in June for the rest of the year. How will fishermen be ensured that there will be bycatch available to them when they want to fish? The race for fish will still continue. Will there still need to be seasons to protect the economic interests of the shareholders? If so, then IFQs make little sense.
6. **INCREASED PRESSURE ON OTHER FISHERIES:** Fishermen who don't receive shares in the sablefish fishery will likely move into another fishery that is "open access" such as Pacific cod. What will be the result of increased pressure on these fisheries? If we plan to implement IFQs in one fishery, shouldn't we instead, immediately consider moving with a comprehensive IFQ system for all fisheries?

7. **TRANSFERABILITY AND LEASING OF SHARES:** Vessel classes are being considered by the Council (under 60', over 60' and freezer/longliners). The value of the shares will vary with the size class involved. Vessels could only sell shares to others in their class. Won't this be a hardship on individuals wishing to sell when the shares in the other classes are worth two to three times more? The Council draft analysis says that the benefits of an IFQ program are greatly reduced by restricting the flexibility of transferring quota. Are they reduced enough to make the program worthless? Are these types of restrictions enforceable? Shouldn't the government benefit from the transfer of shares in a public resource?
8. **TRANSFERS BETWEEN DIFFERENT GEAR GROUPS:** The analysis states that by restricting share transfers between different gear groups, a large part of the benefit is reduced. It further states that free transferability between longline, pot and trawl vessels will ensure an "efficient" allocation of sablefish quotas.
9. **OWNERSHIP CAPS:** The Council is exploring ways to limit control of the fishery under an IFQ system. One option is for an ownership cap of 3% of the total quota. Just 33 owners of an entire fishery. Even if the caps were 1% of the quota, that still provides for only 100 owners. The Gulf quota this year is 42 million pounds, worth over 80 million dollars. Owners can be corporations, partnerships, wives, brothers, sisters, sons, daughters, etc. Could just a few people eventually control the resource? Yes. In fact, an ownership cap is difficult, if not impossible to enforce and according to the analysis it would be hard to legally defend.
10. **CREW MEMBER CONCERNS:** It is clear that under an IFQ system, the demand for crew members will be reduced, maybe by as much as 90%. What fallout will result when life-long crew members can't get jobs? What about their ability to buy into the fishery?
11. **WHO BUYS SABLEFISH?:** The Japanese are the primary market for sablefish and it stands to reason that they would be most interested in buying the shares. Would fishermen become less than sharecroppers?
12. **ENFORCEMENT, MONITORING & UNLOADING:** The enforcement costs and plans are as yet, unknown. Obviously, this is a critical question and must be answered before an IFQ system can be adopted. "Trust me," doesn't work here. If a fisherman can fish at any time as long as he has quota, what restrictions will be placed on the boat owner? Will he be required to give 24 hour notice and be monitored while delivering? Will he be limited as to the ports where deliveries can occur? Is this even enforceable?
13. **ADMINISTRATIVE:** To hear proponents of IFQs, it's a more efficient, less costly management system. Wrong. Some estimates are six million dollars or more in the first year to set up the halibut and sablefish programs. Who is going to pay for this? Currently, there is no money in the 1993 NMFS budget for a limited entry program. There is also no mechanism for Congress to place a tax or user fee on those people who own shares to pay for the running of a program.

14. HISTORY OF FOREIGN PROGRAMS: We see from the history of programs in other countries that many problems result. The Canadian abalone fishery which has had a share quota system for several years has collapsed. It is commonly felt in Canada that overfishing was the cause. The Canadian sablefish fishery which has been share quota for two years is reported to have massive black market sales and underreporting. In New Zealand, one processor controls over 90% of the resource and it is reported that the company is now for sale with interest from the Japanese.
15. TRADITIONAL MANAGEMENT TOOLS: The North Pacific Council has identified over 20 different management tools which can be used to solve problems in the sablefish fishery today. These tools do not require such a drastic management change such as IFQs, nor would they introduce the numerous new problems into the fishery that an IFQ system would. Why isn't the time and energy of staff being put to good use in analyzing the measures already available within the traditional management program?

Fred F. Sheroff, Room 1204
Alaska State Capitol
PO Box 1171
Juneau, Alaska 99801

RECEIVED
JUN 11 1981

Dear Watchdog

As the ITQ or ITD plan is introduced through the... additional discrepancies are illuminated, communities... displeasure, previous supporters change ideas, and... with special interests are able to continue to... change without ratification by the people of the... constitutional end for in the name of industry... (The express intent of the State... fish and game.)

When we are told we must "bite the bullet" and give up our freedom for the good of the state or the good of... we must immediately determine the position of those who... give away our freedom for their gain, remembering all the... comes in many forms.

The greatest threats to Alaskans from ITQ will be the... intrusion into our private lives by the Federal government, and the loss of our Freedom of Choice. The freedom to choose our lifestyle, the opportunity to take the risk and succeed, (or fail), based upon our own ability to compete in a free market, this is the capitalistic way, The American way. To be forced to copy a plan prominent with socialist economies, not only highlights our own shortcomings, but its downright unamerican!

ITQ is another way, a few unscrupulous power brokers, very... attempting to circumvent those freedoms in an effort to bring gain... themselves, while at the same time giving the federal government more control over our lives. Everyone is owed as a natural or moral... protection of the constitution, -due process, and we must continue to fight to maintain that right, lest a dangerous precedent be established... overcome, ultimately denying those rights to all Alaskans.

There may be some who believe this plan does not include or affect them, as they are not associated with Alaska's number two industry, however that is not the criterion. This plan will establish a precedent... allowing circumvention by the federal government of those freedoms guaranteed by the constitution. That's the issue, and no one is...!

You are our watchdog, hired to protect those rights from... by the private, state, and federal sectors, thereby insuring the lifestyle of all Alaskans. Often apathy, complacency, or predestination... tends to give a confused signal, and the special interests are... However, in this instance, this has not been the case. Governor... continues to ignore the outcry of his constituency, opting... only to the economy of \$1.6 billion, and his plan (as he calls it)...

Governor Hickey either believes he is the Messiah, or he... President Reagan's astrology to run the state. (In either case... to displaying does not appear to be coming from above.) If he were a wise man, he would fire Judas (Tillion), and distance himself from this issue. If he were a politician he would do both of the above, and in addition subject this issue to the scrutiny of the voting booth, seems to me the safest place to go!

Please do all you can to stop this plan until such time as a more equitable solution can be found.

Waiting for Great Attention

Jerry B. Scholes

Jerry B. Scholes Box 15331 FCR
Juneau, Alaska 99801

Compiled from original source
by Donna Donohoe, Sitka

Effects Of NPFMC IFQ Plan On Coastal Communities

907-747-6467

01/06/92

Fleet Characteristics

In general, the fishing fleets of the coastal communities of Southeast, and certainly Sitka, are diversified, well-stratified small (less than 60') boat fleets that provide a living to many people. Stratified here means that there are vessels of all sizes included in the make-up of the fleets with the highest concentrations in the 35-50' range. Diversification refers to the fact that most fishermen depend on more than one fishery to provide the income needed to keep their business afloat. "Langdon and Miller (1983) reported that only 7.9% of the fishermen interviewed in Area 2C (Southeast) fished in just one fishery, while 42.9% fished in two directed fisheries, typically halibut and salmon. One-fifth of the fishermen in Langdon and Miller's sample fished for four or more species during the course of the year" (Council's Analysis, p. 8). Diversification has increased through the 1980s.

We believe that these characteristics are vital to the economic well being of the fleet and the communities they help support. Diversification helps stabilize income (and boat values) as it mitigates the effects of annual fluctuations within the different fisheries due to market conditions, stock conditions, etc. This year, for example, the low price of salmon would have been much more devastating locally had it not been for the fact that most salmon fishermen in Southeast participate in other fisheries. Well balanced stratification ensures an entry level in the fisheries, economic mobility, and a wide base of participation (jobs). "In the late 1970s and early 1980s, halibut was the second most important fishery in the Southeast region in terms of employment, ranking just behind salmon" (p. 7). This importance has not diminished through the 1980s. We believe that stratification and continued opportunities for diversification are critical to the well being of the coastal communities.

There are some key phrases you frequently hear repeated to justify a measure being proposed by the NPFMC in their approved Sablefish and Halibut Fixed Gear IFQ management plan. One that Clem Tillion is fond of is "too many boats chasing too few fish". Another is "overburdened with participants". The implication is that the pie is being cut into such small pieces that nobody really gets enough for sustenance. Figures from the Alaska Commercial Fisheries Entry Commission (p. 1 and 2) show that yearly average gross earnings for participants in the halibut fishery fluctuates with price but, if you average out the most recent six years reported (1984-1989) and compare that with the previous seven years (1977-1983), (even if you eliminate 1980 - a very poor year), you can see an increase of over 30% in gross earnings, from \$20,289 to \$30,983. Yearly average pounds landed shows the same trend. In the black cod fishery, the figures are much more dramatic (p. 3 and 4). The increase is in the order of 250%. It is worth noting here that the black cod fishery has only recently become a domestic fishery. Until 1977 and creation of the 200 mile limit, it was primarily a foreign fishery which phased out over the next seven years. There had been minimal involvement in the fishery by domestic fleets until 1984 from which point domestic participation has increased to fill the void. In light of the above information and the perspective offered by Table 1a (p. 10) and 2.4a (p. 12) of the fisheries in Southeast, we find no evidence of plummeting catch rates and/or income but rather indications of economically viable fisheries that have provided many with a reliable source of at least part of their fishing income.

Impact of Initial Allocation

To be eligible for an allocation of quota share one must have landed halibut or black cod in one of the years 1988, 1989, or 1990. Quota shares are to be calculated based on one's average of their best 5 of 7 years (1984-1990) for halibut and the best 5 of 6 years (1985-1990) for black cod. An individual's average is then converted to a percentage of all qualifying pounds and one's quota share is represented by that percentage. One of the ironies of this method of allocation is that it tends to reward those most responsible for the "over-capitalization" so often cited as one

of the major problems associated with open access. According to Council figures there will be approximately 6,118 initial halibut IFQ recipients (compared to 4,059 permits fished in 1990) and 1,081 black cod IFQ recipients (compared to 670 permits fished in 1990).

Because of the method chosen for determining initial allocation of IFQs, quota share recipients with the least number of years as vessel owners with halibut and/or black cod landings (regardless of their overall history of participation in the fisheries) are put at a distinct, in some cases severe, disadvantage as to continuing and upgrading in the fishery.

Why would anyone sell? According to figures from the NPFMC analysis, over 40% of initial recipients in both the black cod and halibut fisheries will receive no more than 20% of their average landings and an additional 26% will receive less than 40% of their average (fig. 4.2, rule 3, p. 4-48 and fig. 2.5.2, p. 2-56 from the Council Analysis). Some of these recipients will be persons no longer active in the fishery or only casual participants. This is significant though as it creates a certain number of quota shares that will most likely be up for sale immediately; It also impacts the initial allocations of those still active in the fishery. Fig. 4.4, rule 3, (p. 4-50) gives an indication of the impact of initial allocation to 1990 halibut participants. It shows that 28% of QS recipients will receive less than 21% of their 1990 landings and another 20% will receive less than 41% of their 1990 landings. Thus, about half of all halibut QS recipients will receive less than half of their 1990 landings and about 67% will receive less than half their average. Only about 28% of halibut QS recipients will receive better than 80% of their 1990 landings and less than 5% will receive 80% or better of their 5 year average. How many businesses will be able to survive that kind of impact to a significant block of their income? Without the ability to buy more quota shares, the impetuous to sell will be great. To quote the NPFMC analysis, "Since many of the initial allocations will be small, it is predicted that the number of vessels and fishermen will decrease as unprofitable QS and IFQs are sold or transferred. The economic model suggests that an economically efficient fishery would contain 288-376 vessels with 1,504 to 1,976

fishermen" (p 5-48, for halibut fishery). This is in contrast to 4,059 vessels and 14,721 fishermen in the 1990 halibut fishery (NPFMC figures).

There will be tremendous competition for quota shares as they come on the market and that those able to pay the most will by and large be those vessel owners more favored by the initial allocation and with the more capitalized vessels. This effectively eliminates an entry level to all but the wealthy and assures further consolidation as fishermen retire and/or cash out of the fishery. There is not sufficient data in the Council Analysis to know exactly how initial allocation will impact Sitka (see p. 5-47, 5.2.3) but, if Sitka falls anywhere close to the averages, the impact to many vessel owners could be severe enough in the short term to see immediate fall-out and in the long run a steady decline in vessel participation (and boat values) as consolidation continues. In addition to this, there will be an immediate reduction of crew members, probably on an average of at least one per boat that remains in the fisheries, then 1-3 more as vessels drop out.

Protection Against Extreme Consolidation?

There is but one provision in the sablefish and halibut management plan (copy attached) approved by the NPFMC Council that limits consolidation (fleet reduction) and that is the ownership and use caps for quota shares. The plan specifies that no individual or person (corporation, partnership, etc.) may own or utilize more than 1% of the combined Gulf of Alaska and Bering Sea/Aleutian Islands quota for sablefish and 0.5% for halibut and the same for any of the combined areas 2C; 3A and 3B; or 4A, 4B, 4C, 4D, and 4E, and that, in areas 2C (Southeast), no more than 1% of the black cod or halibut quota shares or IFQs. Taken to the limit, this represents 100 vessels in the halibut and black cod fisheries in Southeast, as compared to 1990 levels of 1,486 and 329 respectively - a 93% reduction of participation in halibut and 69% reduction in black cod. In 1990, 278 Sitkans held halibut permits and 114 held black cod permits, with an average of 3.6 persons per boat (NPFMC figures).

The provisions that some like to call "protection to the coastal communities" are that quota shares or IFQs initially allocated "for any vessel category or any management area may not be transferred to other vessel category or any other management area" (Sec. C-3-iv of plan). The vessel categories are as follows: halibut - 1) freezer/longliner, 2) catcher boats, a) vessels less than or equal to 35', b) vessels more than 35 feet but less than or equal to 60', c) vessels more than 60'; sablefish is the same but without the less than 35' class break. Upon inspection, it is hard to find any protection from these provisions. For this to be significant, you would have to assume that boats in the two smallest size classes would be capable of harvesting much less than 1% of the quota. In area 2C, 1% amounts to (at 1990 quotas) 80,000 pounds of halibut and 125,244 pounds of black cod. There is no shortage of vessels in the less than or equal to 60' class capable of this level of annual harvest. As for the less than or equal to 35' class which applies only to halibut, look at Table 1b (p. 11). You will find that vessels in this size class took, on an average of the years 1984-1990, 18.4% of the annual quota for halibut in area 2C. At 1990 levels, that represents 1,472,000 pounds. If, for argument sake, you assume that initial allocation keeps this percentage (which it probably will not) and that it is only practical for a vessel in this class to harvest at most 1/2 to 1/3 of the 1% limit in Southeast (40,000-26,666 pounds), you are still talking about only 36-55 vessels in comparison to 673 vessels in 1990. Where is the protection against extreme consolidation?

The other measures of "protection" offered are that the owner of the IFQs must, in most cases, be aboard the vessel fishing the quota shares and that quota shares can only be sold or transferred to a U.S. citizen who is a "bona fide fixed gear crew member". (This is also ironically the "recognition" given to fishermen whose participation in these fisheries has been primarily as crew members.) A bona fide fixed gear crew member is "any person that has acquired commercial fish harvesting time at sea (i.e. fish harvesting crew) that is equal to 5 months of any commercial fish harvesting activity. Additionally, any individual who receives an initial allocation of QS will be considered a bona fide crew member" (Sec. 1-1 of plan). This is an effort to keep quota shares from

becoming owned and controlled by corporate interests. (The corporations being allocated QS are current fishing operations.) Though this may slow the process of consolidation down, what is the difference in the long run to the economic well being of the small boat fleet and the coastal communities if the rights to harvest in all the federally managed waters off the coast of Alaska are controlled by a few hundred very wealthy vessel owners or a handful of corporations, as is the case in New Zealand? It should be added that according to the Magnuson Act (Sec. 304-97-453, 99-659a, b, and c), the Secretary of Commerce has ultimate control over the final version of this plan and it is without a doubt that there will be heavy lobbying in Washington, D.C. to have as much of the "restrictive language" (i.e. 1% cap, vessel size classes, bona fide crewman provision, etc.) as possible removed.

IFQ VERSUS LIMITED ENTRY

This is not just another limited entry system. "Fishermen and managers should be aware individual quotas are not simply an alternative licensing system. The transition to IQs is a fundamental change that converts to private property that which has been a public or common property resource" (from A Commission of Inquiry into 'Licensing and Related Policies of the Department of Fisheries and Oceans (Canada), p. 36).

In the limited entry system instituted in the State of Alaska, the first thing that is done is to set a maximum number of permits to be issued based on the highest number of participants in any single year of the four most recent previous years. That number of permits is then issued. Eligibility is dependent on deliveries in a set base period. Permit recipients are then determined from those eligible through a point system whose criterion include, but not limited to, past participation as captain and/or crew, investment in fishery (ownership of vessel and gear), availability of alternative occupation, and income dependence (fishing versus non-fishing). The State is now just beginning the second stage of the limited entry process which is to set an optimum number (which could be either higher or lower than the maximum number) of vessels for each

limited fishery. The criterion for finding this number are being worked on now but must, according to the limited entry enactment law, reflect a reasonable balance of conservation concerns; an economically healthy and reasonable fishery; and hardship to fishermen.

The only thing this IFQ plan and the State limited entry system have in common is that eligibility is dependent on a set base period. There are no similarities beyond that point. State limited entry permit recipients are determined on a variety of criterion and then given equal access; this IFQ allocation is determined solely on poundage delivered. State limited entry gives only access to harvest; IFQs give absolute control over a certain percentage of the quota. State limited entry protects fleet participation; this IFQ plan is designed to reduce fleet participation through quota share consolidation. One of the glaring omissions of this plan is the lack of any parameters for optimum fleet size and an attempt to achieve that with as little disruption as possible.

Conclusion

There is an endless variety in IFQ management schemes currently in effect. Many were imposed on fisheries already under a limited entry program, a much different scenario than using an IFQ system as a limited entry scheme. Some are freely transferrable, some are attached to vessels, some are non-transferrable, some are leasable, many are not. The formulas for determining quota share vary greatly, few rely solely on historic landings, some are all equal. Most, with New Zealand and Iceland being the main exceptions, have been applied to fisheries involving at most a few hundred participants (some less than 100) and more localized areas. Nothing of this magnitude has yet been implemented. Though there are benefits to individuals granted IFQs (which managers and beneficiaries are quick to applaud) high-grading and black marketing remain a problem in nearly all QS fisheries and some have seen radical quota reductions or even closure because of crashing stocks. It is also clear that, where allowed, consolidation is the rule and where uncontrolled, it is extreme. New Zealand is a good example of this. "Economists of the New Zealand Fishing Industry Board suggest that "

SOUTH CENTRAL ALASKA LONGLINE ENTERPRISE

P.O. BOX 650

SEWARD, ALASKA 99661

PH. 907-224-8751 FAX 907-224-5364

JANUARY 14, 1992
GOVERNOR WALTER HICKEL
STATE CAPITAL BUILDING
JUNEAU, AK. 99802

GOVERNOR HICKEL,

I FIND YOUR PRESS RELEASE AND LETTER TO THE CHAIRMAN OF THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL REPREHENSIBLE! THE CITIZENS AND COMMUNITIES OF THIS STATE HAD TURNED TO YOU WITH THEIR CONCERNS ON THIS IFQ ISSUE AND YOU IN TURN HAVE SLAPPED US IN THE FACE WITH THIS LUDICROUS PIECE OF COMMUNIQUE. YOU HAVE ASKED FOR NOTHING MORE THAN WHAT IS THE DUE COUNCIL PROCESS.

THE COMMUNITIES WHO PASSED RESOLUTIONS WERE ASKING THE COUNCIL NOT TO VOTE THIS PLAN IN UNTIL A SOCIAL AND ECONOMIC IMPACT STUDY COULD BE DONE. THEY WANTED TO SEE WHAT KIND OF IMPACTS THEY WERE GOING TO HAVE BEFORE THE PLAN WAS IMPLEMENTED. WHEN THE COUNCIL VOTED TO GO AHEAD WITH THIS PLAN THE COMMUNITIES STARTED ANOTHER CAMPAIGN ASKING THE COUNCIL TO RESCIND IT'S VOTE AND DO AN SEIS BEFORE IMPLEMENTATION OF AN IFQ PLAN. WHEN ALL ELSE FAILED EVERYONE TURNED TO THE GOVERNOR OF THE STATE HOPING TO GET SOME SUPPORT. WHAT WE HAVE RECEIVED IS A SMOKE SCREEN.

YES, GOVERNOR HICKEL, THERE IS AN ECONOMIC ANALYSIS UNDERWAY BUT IT WILL BE GOING TO THE SECRETARY OF COMMERCE ALONG WITH THE IMPLEMENTATION PLAN. AND YES, GOVERNOR HICKEL, WE WILL BE ABLE TO REVIEW IT AND WE WILL EVEN HAVE 45 DAYS TO SUBMIT COMMENTS. BUT THIS WILL BE AT THE SECRETARIAL LEVEL NOT THE COUNCIL LEVEL. THIS IS WHAT THE PEOPLE AND COMMUNITIES OF THE STATE WANTED WAS FOR THE COUNCIL TO RESCIND IT'S VOTE, DO THE ANALYSIS AND RETURN THAT ANALYSIS TO THE COUNCIL, WHERE WE COULD VIEW THE MATERIAL AND HAVE THE OPPORTUNITY TO EXPRESS OUR PUBLIC OPINION AND CONCERNS AT THE COUNCIL LEVEL.

WHAT WE WANTED FROM YOU GOVERNOR HICKEL WAS A LITTLE SUPPORT SHOWING YOUR OWN CONCERN FOR THIS STATE, IT'S PEOPLES AND IT'S COMMUNITIES. WHAT WE WANTED FROM YOU GOVERNOR HICKEL WAS A LITTLE INDEPENDENT THINKING. WHAT WE WANT FROM OUR STATE SEAT ON THE COUNCIL IS A COMMISSIONER, NOT A FISH CEAR!

WHAT WE WOULD LIKE FROM YOU GOVERNOR HICKEL IS A DEFINITIVE REQUEST FOR THE COUNCIL TO RESCIND THEIR VOTE AND BRING THE ANALYSIS BACK TO COUNCIL JURISDICTION, WHERE WE THAN WILL HAVE THE CHANCE TO REVIEW THE ANALYSIS AND MAKE OUR COMMENTS TO THE COUNCIL. COMMIT OURSELF TO THE PEOPLE AND COMMUNITIES WHO COMMITTED THEMSELVES TO YOU WHEN THEY VOTED YOU INTO THE GOVERNORS SEAT.

SINCERELY,

Nancy L. Lande
NANCY L. LANDE
PRESIDENT/S.C.A.L.E.
REGISTERED VOTER

JERE T. MURRAY
P.O. Box 237, Seldovia, Alaska 99663-0237
(907) 234-7646
December 17, 1991

The Editor
Homer News
3482 Landings Street
Homer AK 99603

Dear Sir:

Doug Loshbaugh's article on the North Pacific Fishery Management Council's (NPFMC) December meeting action on IFQ's mentioned a 3-2 margin of opposition in public testimony and "hundreds of letters ... tilted against ITC's." I attended the Council meeting and felt that the opposition was more strongly opposed than 3-2 so I looked to the Council's information packet where I found a summary of written comments on IFQ's received at the Council's offices during October and November. These include letters from individuals, resolutions of municipal councils, petitions, form letters, etc. I have tallied the results. I have added the totals in two categories - Favorable or Neutral to the IFQ plan, (F/N), Opposed or Concerned, (O/C). Additionally I differentiated between comments coming from Alaska addresses and from non-Alaska or unknown addresses. For letters with multiple signers and petitions each signer was counted. Groups reporting the vote were tallied accordingly (for example, City of Unalaska - 1 favor, 5 oppose). Multiple letters from a single signer were counted once. Here are the results:

Of over 800 signatures, 80% are O/C, 20% F/N (4 - 1), 83% are from Alaska addresses, and 17% from non-Alaska or unknown addresses.

Of the Alaskans signing 94% are O/C (15+ - 1) and only 6% are F/N.

Of the non-Alaskans signing 87% are F/N while only 13% are O/C (1 - 7).

At least 70% of the signers with non-Alaskan or unknown addresses are members or supporters of a single Seattle based organization - the Fishing Vessel Owners Association (FVOA).

So it appears that this IFQ plan is opposed overwhelmingly by Alaskans while it is supported outside, but by not so large a margin, mostly by a small group of Seattle vessel owners.

The members of the FVOA will profit tremendously if this plan is implemented as currently proposed. Not only will they be given quota shares (QS) which will probably have market values in the multiple tens of millions of dollars area, but they will stop the decades old inroad into their "share" of the halibut harvest which has been made by the smaller Alaskan based boats - many of which are based in or near Homer. They will be able to deliver their catch directly to Southern ports and thereby profit from the transportation differential. Ultimately, they will employ fewer crew.

It is no wonder that the FVOA worked so hard to get its manager, Bob Alverson, placed on the North Pacific Fishery Management Council where he now serves as Vice Chairman!!! It is no wonder that they try and attribute Alaskan opposition to a single island (Kodiak) when in reality opposition comes from the entire stretch of coastal Alaska from Southeast to the Bering Sea and support seems to come primarily from Ishmallof Island, a small island suburb of Ballard, Washington, which is, ironically, located in Kachemak Bay.

Looking a bit deeper one soon sees how much Alaskans have to lose under the current plan. Nearly 2500, or 32%, of the Alaskan boat owners who participated in the halibut fishery between 1984 and 1990 will receive no QS. They will not be

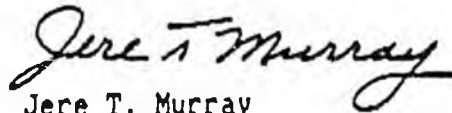
able to use their longline gear in the cod fishery as the plan requires the possession of halibut or sablefish IFQs to fish cod! Many may not be able to buy QS in the future. No crewmen will receive any QS as crewmen - their numbers are unknown but surely there are several tens of thousands. The current plan would allow the fleet of boats harvesting sablefish and halibut to condense down to as few as 200 from the near 10000 which have participated during the qualifying years. At three crew per boat, this ultimate insult would result in a 96% reduction in the crew participating or 29400 people who could not get any of their annual income from endeavors they had participated in in the past - most of these people will be Alaskans. They will be removed from the fishery without compensation. Less and less fish will be landed at Alaskan ports with the result that the need for shoreside workers will be lessened. The Council has failed to quantify this and many other adverse socio/economic effects on coastal Alaska!

Mr. Alverson and Mr. Tillion have two of eleven votes on the NPFMC. The people mentioned in the preceding paragraph have none. If we want to try and even the odds and restore some semblance of the democratic process we can ask the governor to remove Mr. Tillion from the NPFMC seat rightfully occupied by the Commissioner of the Department of Fish and Game. We can also sign the petition circulating now which requests that the council rescind the recent action and take the time to do it right. Finally, letters to individual council members who know this is a bad plan but voted for it out of frustration and exhaustion might help them see their public duty more clearly.

We can only wonder when they will find time to do it over if they can not make the time to do it right.

Too many of us are severely damaged by this abortion, we must unite to change it. If we don't, we deserve the result! Get out your pens - now!

Sincerely,



Jere T. Murray

THE SABLEFISH/HALIBUT IFQ PLAN IS BAD FOR ALASKA

The number of participating boats will be reduced, over time - perhaps to as few as 200 (from over 4000 now)

These boats will hire fewer crew - as few as 600.

These boats will be more likely to deliver to outside ports.

Many existing crew will be out of work - over 29000 may not be needed.

Fewer cannery workers will be needed.

Coastal Alaska communities may experience reduced income and population.

Many Alaskans who have participated in the past will receive no IFQs.

2500 Alaskans who owned halibut fishing boats between 1984 and 1990 receive no IFQ under the plan.

They are cheated of their rights to the resource.

They can quit fishing halibut or buy in.

30000 crewmen - mostly Alaskans - receive no IFQs.

They'll have no bargaining power to help keep their jobs.

They are cheated of their rights to the resource.

Future generations of Alaskans will have to buy the right to fish for our stocks.

Alaska's share of the harvest can only increase if Alaskans buy it from outsiders!

It may be very expensive to buy enough IFQ to survive in the fishery.

National Marine Fishery Service estimates market price may be 3 to 8 times the value of the fish.

Alaskans may be at a disadvantage in this market.

Coastal Alaska communities which have not participated in these fisheries will find it more difficult to do so in the future.

The rights to harvest will have to be purchased.

Halibut and Sablefish exports in ships will only be allowed from one of sixteen designated "Primary Ports."

The IFQ program is expected to increase highgrading in the halibut fishery. This could be bad for the halibut stocks.

This IFQ plan may allow overfishing the cod resource.

The availability of fresh halibut in Alaska may be reduced.

"Dock sales" will be expensive and cumbersome.

Seller may have to post a bond.

Seller will have to buy and maintain an "electronic card machine"

The whole fish load will have to be unloaded, weighed and accounted for before dr... can begin.

compiled by Jeri Murray
P.O. Box 237
Seldovia AK
(907) 234-7646

MR. RICK LAUFER, Chairman

N.P.F.M.C.

et al

KODIAK

JUNE 10, 1991

CHARLES L. SINK

SR 6247

KEVIN, HI. 96749

Dear Sirs:

Make no mistake, establishing IFQ's for halibut and sablefish would set a most dangerous precedent. This precedent of "privatization" of ownership of allowable fisheries quotas would only seek to concentrate the ownership into fewer and fewer hands. One can observe these models in Newfoundland where only two companies own the total offshore allocation and in Australia where one man owns 95% of a fishery allocation. Any scenario to set a minimum/maximum of IFQ ownership would only favor the large producers (many of whom are not all American financed nor owned) to a concentration level as absurdly proposed in one NPFMC meeting as a maximum of 3% ownership. This easily translates into 33 owners and yes "ghost" ownership.

IFQ's by their design into fewer hands translates into corporate ownership i.e. catcher process i.e. foreign ownership.

America's fisheries resource is one of the last readily accessible "primary" resources available to the common man.

As yet, there are many management schemes untried. IFQ's are proposed for reasons of profit

fishermen now have.

Large catcher/processor vessels, also are more ~~and~~ wasteful of the fisheries resources on a pound for pound basis than the smaller catcher vessels in terms of bycatch. Why favor the large boats then?

Implementation ^{of IFQ's} and its ~~annual~~ annual costs would be far greater than current management schemes. So, why support a scheme that costs the taxpayers more and serves fewer and fewer?

If limited entry permits in Alaska are any indication of a trend of ownership it is the trend to outside of Alaska. Would IFQ's be any different?

By current management methods most fishing vessels in Alaska economically need to fish more than one fishery if not yearly at least at times to take into account the fluctuation of fishery populations either by harvesting or by their own greater designs. To cut off access to already viable fisheries would seriously harm all fishermen. To design by Federal decree who gets what subplants the more traditional God and skill of the fisherman. For me, an ACTIVE fisherman, God and my skill is a more attractive arbiter.

For this ~~is~~ at the market place.

IFQ's are not a better solution than timely openings. Again, looking at the British Columbia model of IFQ's, the Canadians caught their entire IFQ's just prior to Alaska's first halibut opening for 1991. A better harvesting model is the one fisheries managers are now exploring by setting fisheries quotas for different times of the year. This is both fair to all fishermen (not the few large fishermen/owners), consumers, processors and fishery managers.

It is true now as in the future realistic quotas for harvesting must be set and not abused like our allowable annual yield forest management disaster. IFQ's will not influence it. Yet, when a fishery resource declines, the marginal owners of IFQ's will sell out thus losing their access to the fishery and ever serving to tighten the knot of ownership.

Yes, there is an overcapitalized fleet. The reasons for this are many and complex including much Federal subsidization (Capital construction funds, NMFS loans), foreign investment, dumping of "mud boats" from the oil industry into fisheries, and outright good fishing and prices, et cetera. So, with this inflated fleet of ours, does it need Federal protection of the large producers and wasters
 (minor remarks...)

through implementation of IFQ's and/or limited entry schemes? No, I think not. Let competition be this cruel judge as it has always been. Only those who fear competition seek to circumvent it and greedy, fearful, and small they be. There is no fair or skillful judge by Federal decrees. Only the few, the richer will be served by IFQ's. The common man, again mind you, will be blocked, locked out from another of our primary resources. This time by an IFQ system if implemented.

Therefore, I am opposed to any IFQ system. I am opposed to limited entry. I favor current management techniques. I see most fishermen doing well at this time and I also see where increasing competition and declining fisheries allocations will ~~collapse~~ ^{conflict}. It has happened many times before and we fishermen have survived. A Federal net would only serve the overinvested and major fisheries corporations (read foreign).

I request that you who are trying to manage our fisheries not implement a grossly unfair and costly system. Represent the people and our country's future, not the few.

Charles L. Sink



KODIAK OIL SALES, INC.
NORTH PACIFIC FUEL
P.O. BOX 1487
KODIAK, ALASKA 99615

Mr. Rick Lauber, chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage Ak 99510
271-2809

May 22 1991

Re: IFQ's

Dear Sirs:

This is a letter in opposition of the concept of IFQ, ITQ or whatever acronym is being used to describe this concept of fisheries management.

I'm not a fisherman, I own and operate a fuel company in Kodiak. My customers and friends are fishermen. The future of fishing is important to all of us who work and live in coastal Alaska.

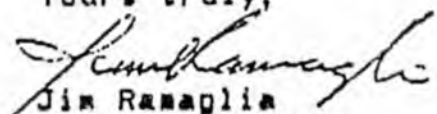
The IFQ system has failed in other parts of the world and I think the North Pacific Council should learn something from these examples.

What has made our country and our fisheries successful is competition and the free enterprise system. It is the right to risk everything you own, try your best and succeed or fail. It is the right to try new things such as become a fisherman instead of being an accountant or a doctor. A system based on IQF's will eventually end up with a few people or companies owning and controlling the fisheries.

IFQ's runs against the grain of "fishing families", teaching your children to fish so they can get a boat and make their living fishing follow in their parents footsteps". There will be no room in the fisheries for children of fishermen.

I know fisheries need to be managed to protect the resource, I don't pretend to know the answers, but I know that someone can figure out a better solution than the concept of IFQ's.

Yours truly,


Jim Ramaglia
vice president

May 28, 1991

Dear Sirs:

I am opposed to the IFQ system for managing the sablefish and halibut fisheries. With the salmon fishery being our main source of income we need the halibut fishery to subsidize this income. Many people depend on the halibut fishery to complete their yearly earnings. IFQ would cut short these vital earnings and cause hardship for the families in this area as well as other Alaska fishing towns & villages.

Sincerely

Bonnie Sudder

Bonnie Sudder

P.O. Box 3708

Kodiak, Ak

99615

May 24, 1991
Box 3080, Kodiak
Alaska 99615

NPFMC Box 103136
Anchorage, AK 99510

Dea. Mr. Lauber,

I shudder to hear people blaming the "Derby System" management plan for their misfortune. Should any boat be less prepared for North Pacific given another management plan. At least when the wind is blowing at 30 knots, skippers think twice about going 50 miles offshore. Every year we are reminded about the necessities of leaving the harbor prepared for the worst. The lucky ones merely read of the misfortunes. The weather off Kodiak is unpredictable. It always amazes me to hear someone blame the 24 hour opening for their misfortune. Would 72 hours be a more fortunate fishing period. Under an IFQ system a boat may be out in the gulf alone when the wind comes up or the boat takes on water. How many boats and people are rescued by other mariners? There is some security in numbers. Instead of complaining after the fact why aren't more of the fisherman at the January commission meeting that sets the dates? When people plead for a flexible opening they should remember that area 3 goes from Cape Spencer to False Pass. How often does it not blow during a 24 hour period someplace in that district. As we head down a seemingly one-way street towards an IFQ system our complaints are especially timely. Do we want the quick fix the Fisheries managers seem to want for us?

A year ago I thought the tide had turned against IFQs and federal limited entry. When the candidates for Governor debated here in Kodiak, every one of the then candidates seemed to understand that ownership of the resource would leave the local communities short of product and permits. I don't understand why the non-fishing interests of Alaska want this so badly but I suspect it has something to do with creation of property. Several billion dollars in limited-Entry permits have stimulated borrowing and provided collateral for many loans in the state. Our county's debt is astronomical. If you give a value to a share of the resource you intensify the debt problem. Unlike the state Limited-Entry system, IRS will be able to reposes the IFQs. If the black cod ceased to be abundant for a few years the little guy who is trying to pay for his shares will be the big loser. Resources do decline under limited-entry plans, in spite of what some would lead us to believe (i.e. Sitka Herring, where permits were \$600,000. two years ago; now they are a third of that).

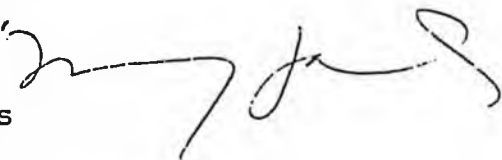
I thought any IFQ system would self-destruct. There would always be those who would be hurt and they would fight the system. We've been worn down by the ten year seige to get federal limited entry. In spite of studies that show that permits leave the local communities, that the majority of shares would be Seattle based, and statements by groups of processors that the

predictable 24 hour opening is a favorable marketing tool, specials on halibut, advertisement and processing can be planned months in advance; IFQs are pushed at us by people like Clem Tillion who think they know what is best for us and the consumer. There was a NPFMC study done concerning halibut shares that showed the value of the shares becoming a major expense to the fisherman. I don't see how the price of fish can be lower to the consumer after you add the expense of ownership.

So here we are, the month before the decision on IFQs and Kodiak Fishermen are desperately trying to increase their shares. Instead of testifying in April they were building gear and now if they politic instead of fish they can really screw themselves. Its ironic that the comment period coincides with the fishery. Luckily there is a group of involved wives to keep the issue alive. I wish we had a more concrete plan to comment on. Is the plan to put the system in place and then fine tune it? Maybe those guys that are out there now aren't doing it for nothing; maybe they'll have a few shares to sell. At least give us another chance to comment on the model. When the economists get done figuring out what is good for the resource and the consumer, let us comment on how it will affect our communities and our fishermen. Maybe one of your economists can study the economic impact of whatever specific system you devise and we can look at it before a comment period. Please give us a chance.

Sincerely,

Mary Jacobs



RON THOMPSON
BOX 567
KODIAK, AK 99615

DEAR SIR:

I FIRST WOULD LIKE TO SAY I AM AGAINST ANY FORM OF LIMITED ENTRY OR I.F.Q. FORMS OF FISHERY MANAGEMENT. I OWN AND OPERATE THE 58 FT NORTHERN JAEGER OUT OF KODIAK ALASKA. AT THIS TIME MY INCOME COMES ONLY FROM FISHING HALIBUT - KODIAK ONLY AND SALMON TENDERING. I HAVE FISHED DUNGENESS, KING & TANNER CRAB, A LITTLE SABLE FISH, GRAY COD AND HERRING. BUT JUST TENDERING & HALIBUT FISHING EARNS US AN OK LIVING. I COULD FISH FOR MORE SPECIES AND LIKE THE OPTION THAT I COULD IF THE NEED ARISES BUT RIGHT NOW I DON'T NEED TO. I DON'T NEED TO MAKE MASSIVE AMOUNTS OF MONEY TO ENJOY A GOOD LIFE. I THINK THESE FISHERIES COULD SUPPORT MORE FISHERMAN BUT THERE SEEMS TO BE A GREED FACTOR WHICH IS DRIVING PEOPLE WHO DON'T WANT TO GET LEFT OUT OF THE FISHERIES. PRIVATIZING THE FISHERIES AND MAKING INSTANT MILLIONAIRES OUT OF A FEW BOAT OWNERS IS NOT MANAGING THE RESOURCE. PROBLEMS IN THE FISHERIES CAN BE ADDRESSED WITH TRADITIONAL & SOME NEW EDUCAT. MEASURES. PLEASE DON'T LET GREED DICTATE HOW OUR NATIONAL RESOURCES ARE MANAGED. THE JOB OF THE COUNCIL IS TO MANAGE THE FISHERY NOT THE FISHERMAN.

THANKS .. Ronald B Thompson

May 9th, 1991

Mr. Rick Lauber, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK. 99510

Dear Mr. Lauber,

I am opposed to the IFQ system
for the management of the Sablefish and
Halibut fisheries. I believe that the
IFQ's system is not in the best
interest for the community of Kodiak.
Thank-You,

Sincerely,

Trisha Gantland
2125 MOUNTAIN VIEW DR.
KODIAK, AK.
99615

RECEIVED MAY 18 1991

Dear mister Rick Touber.

I feel that the IFQ
will endanger the lives of fishermen
on crew. The freedom of Enterprise
is a fact of life for all
citizens of the United States

as a crew member my
lively hood is threatened. Crew
shares will be dictated by the
management in such away as to
telling the owner how much to
catch.

Remember that fishing is
productive Resource not a controlled
environment and the freedom
of Enterprise is my Constitutional
Right

Kevin M & Lynn
PO BOX 1897
Kodiak AK

May 14, 91

Dear Sir:

In reference to the ITQ system for managing the sablefish & halibut, I am greatly concerned. This would be a terrible move, it will destroy the small vessel operators, & Alaskans living in coastal regions will also be hurt by this move. We need to look for other alternatives of fish management. This would devastate Alaska's Alaskans.

A concerned Ak. Voter,

Mia Ann Boehl
P.O. Box 8355
Kodiak, AK 99615

5-13-91

Dear Sir:

I am concerned with the IFQ system plan. I know we should consider other options to solving the by-catch problem with other management measurements. We do not want to deplete the fish populations and take fishing opportunities away from the individual and/or small harvesters.

Please ~~do something~~ stop the imp. do not implement this IFQ system. It will only devastate the Alaskan Fisheries ~~the~~ and put the status of the fisheries in one similar to those of the lower 48. This is the last one to protect from mismanagement in the U.S. Control should not be in the hands of only the largest industry entities.

Thank you for your prompt consideration and action;

Lori J. Stratton
Lori J. Stratton
P.O. Box 2030
Kodiak, AK 99615

To Whom It May Concern,

I as an independent fisherman believe
I FQ are totally out of time as far as
the American Dream goes.

In fact them and young men will not
have not futures. no Dreams to make
come true.

My suggestion is you, instead of tell that
would be as a lottery for the gypsies
skippers and of Owners with high quotas
and low number of boats. Why should you
let the Rich get Richer & Strong. They want
for themselves only I personally cant see Reality
are to lay to continue but to met with
you I do alot in showing you how I feel.

You and the Worlds Future.

Michael Brian Jones
MICHAEL BRIAN JONES
GEN. Del.
Dutch Harbor

Dear Sir,

I am against the I.F.C. system.
I don't think this is the proper
way to manage the fishery.
We need to start considering
the small operations. This fishery
was built by small boats in
the coastal community. Now you
are trying to take the fish from
us and give them to state side
boats (i.e. Wash, Oregon boats).
I think you aren't giving Alaska
boats enough priority. We fish
here, we live here we spend our
money here. **KEEP OUR ALASKA
RESOURCE IN ALASKA, NOT SEATTLE.**

Thank you
Alon Johnson
TU CART-07-81CT

15 May - 1991

I Troy M. Saue am opposed to the IFQ system for managing the sub-
fish and halibut fisheries. Those who
fish and make their livelihood from
the sea should be the ones to
have the majority of the decision
making and their voice should
weigh heavy in this decision.

For those who think other-
wise I challenge them to go
fishing, so that they may better
understand and appreciate the
opinion expressed hence.

Troy M. Saue

TROY M. SAUE
Gen. Delury,
Nininkhit, AK
99639

Dear Sir;

I am a commercial fisherman
of some 7 yrs experience. I have
been following in the T & A debate
since New Zealand started its
T & A program.

As a result of my readings
I find myself in opposition to
the views put forward by T & A
proponents.

Thank you for your prompt
attention to this matter.

Yours
Alan Rudolf McGillivray
Alan Rudolf McGillivray
P.O. Box 8165
Hobart TAS 7501

THANK YOU FOR YOUR TIME
Damon Young

I AM A FISHERMAN AND HAVE BEEN
FOR MANY YEARS. I OPPOSE THE IFC
PROPOSAL AS IT WOULD INCREASE
PROMOTE FREE ENTERPRISE AND, NOT TO MENTION
MANY OTHER DEVIATIONS
THE IMPACTS ON OUR COUNTRY!

DEAR SIR:

REC'D 1/11/15
99615

10. Box 1924
Kodiak, AK 99615

Dear Sir

I have lived in Kodiak, Alaska for 5 years now. Since then my husband and I have started a family. My husband, a commercial fisherman for 12 yrs, and I love Alaska and the values and free enterprise opportunities in the fishing industry.

It disturbs us greatly that no other proposals have been seriously considered, when I know there are many other management tools available, and the IFQ option is weighing heavy on all of us. It closes the door on any claim of owning our own vessel which would be the result of over a decade of hard commercial fishing work.

What, are we just a year or two too late?
What's happened to free Enterprise America?

I ask that you seriously consider other tools before the extreme IFQ proposal that will have regrettable side effects and damage we'll all suffer for.
Thank you, Mrs. [Name]

Blake W. Kinnear, F/V Lin-J
211 Hillcrest
Kodiak, Alaska 99615

North Pacific Fisheries Management Council
Anchorage, Alaska

Agenda Item C-4

Mr. Chairman and members of the NPFMC:

My name is Blake Kinnear and I am a life long Alaska Resident and make my entire living from diversified fishing activities. This is a family owned vessel, and our success for the past 20 years has been based upon our ability to diversify, and the flexibility to participate in many fisheries.

- shrimp trawling,
- crab fisheries
- grey cod
- longlining for blackcod &
- halibut
- tendering for salmon and herring.

I would like this letter to document my opposition to the IFQ type management system being implemented in any of our Alaskan fisheries, particularly halibut. I support "traditional" management methods designed to protect the resource and limit gear. I believe healthy fisheries are much more likely to result from some well thought out gear limitations, (combined with tank inspections for larger vessels and vessels who will be making long transits) than from an elaborate plan creating red tape confusion, and be unenforceable with the regulatory infrastructure now in place.

IFQ's will tend to be consolidated in larger operations, which will remove the economic benefits of the fishery from our coastal communities in the course of a few short years. Regulations attempting to avoid concentration of quota in the hands of a few large entities have shown themselves vulnerable to legal challenge in certain East Coast Fisheries that have tried IFQ's. This is only one aspect of IFQ's that has already been developing independently of expectations, overharvesting due to high grading and black market transactions that are much easier to accomplish if fish are passing over the docks constantly & have shown itself to be a problem in Canada and New Zealand.

Can the NPFMC honestly say that U.S. regulatory agencies have an adequate handle on all the fish products currently moving in and out of Alaska. In my travels around the state I observe consistent unsupervised trans-shipment of product to Japanese trampers in remote areas.

I have decided (in the ten years that limited entry strategies have continually been considered and rejected) that the NPFMC's time and effectiveness have been severely wasted by the relatively small group of politicians, bureaucrats and greedy businessmen who have a hidden agenda, or their own reasons for locking up our fisheries in an imitation "big business" which has already taken over most aspects of food production, packaging, and marketing.

Government finds large corporations more to their liking to deal with. Bureaucrats would like to carve out new sources of funding to protect fading government budgets and maintain as top heavy a system of regulation as possible. Some Fleet owners and processors see an opportunity to secure investments after an overbuilding binge. The self interest is understandable, but the worst part is that the plan is unenforceable at any cost and will encourage widespread cheating that will devastate the resource. Again, I say we should have

- more traditional gear limitations
- step up enforcement of meaningful rules that can be most easily enforced, and
- pay for a workable system of minimum size with reasonable user fees.

(For example the Kodiak processors and fishing organizations for the past DECADE have requested tank inspections, with no action from either the NPFMC or the IPHC.)

- e Lets maintain the flexibility of our fleet and the economic health of our coastal communities by keeping access open to as many small operators as possible, thereby spreading and multiplying the economic benefits.

Over and over meetings have been scheduled during important fishing seasons or moved to locations more convenient for bureaucrats than industry. (Example: the postponing sablefish decision in Juneau after the NPFMC had advertised this decision for their Anchorage June meeting. Another example of poor planning was that for three years running the NPFMC took up the question of crab bycatch in the Bering Sea, negotiating numbers with the trawl fleet on the opening day of the Bristol Bay King Crab Fisheries.)

The disenfranchisement of fishermen and processors by the NPFMC's approval to send forward the sablefish IFQ plan this past summer in spite of overwhelming opposition, points up the Council's complete failure to listen to industry, its own advisory council and points to questions of representation and possible conflict of interest.

Please listen to what the fishing industry is saying, ~~from~~ ^{with the} processors and from the coastal communities in Alaska and do not accept this poor excuse of a bureaucratic resource management strategy.

Thank you for your time and consideration of my views.

Blake W. Kinnear, Skipper
F/V Lin-J

Oliver N. Holm
Box 3865
Kodiak, Alaska 99615

NPFMC
Anchorage, AK

Dear Mr. Chairman:

I wish to comment on the blackcod and halibut IFQ proposals. As you know, I have been involved in the Council's debating of halibut and blackcod limited entry since 1983. While I find it difficult to continue pouring time and money into council meetings year after year, I still feel that the Council has not come up with a system that is economically or socially better than open access. IFQ's are often sold as a conservation measure. This couldn't be further from the truth. With year round landings and incentives for high grading and the necessity of discarding fish when a vessel doesn't have a quota share, large overruns of the quota are likely.

In addition, a large class of arbitrarily excluded citizens will be created who will see no rational reason why they should be precluded from harvesting the resource. The attitudes in the salmon fishery prior to statehood when trap operators were favored over others will come back and enforcement will be a losing battle. Current cheating on seasons doesn't generally threaten the resource as it is all openly landed and is counted against the quota.

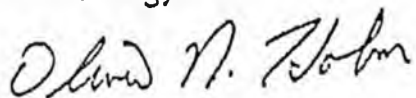
The Magnuson Act gives some mention to protecting the historic social organization of the fisheries. The IFQ system only protects the interests of the first round of fishermen who are given the quotas. Crewmen, shoreworkers, processors, suppliers and Alaska's coastal communities have a stake in these fisheries also, and would surely lose under the new system. The consumer is often cited as benefitting from the IFQ system. This is a myth as prices will be as high or higher under the IFQ system. Fish hauled out of Alaska under IFQ's in an effort to maximize profits to the IFQ holder will not be as fresh or as good as product delivered a few hours after it is caught and frozen as is the practice with the lion's share of the fish now.

While admittedly there is some benefits to the original operator who is granted a free harvest right, the social costs are far too great to conduct this experiment in social engineering while there are so many clear cut losers.

We are all familiar with the social and political instability in some South American countries that is largely the result of all their natural resources being owned by a few, while the rest of the population faces poverty and economic servitude. It is hard to believe that the U.S. Government is considering a move that will block Alaskans from participating in resource harvesting at their very doorstep.

It is time to reject IFQ's once and for all. Under the current threat of limited entry, vessels are precluded from not fishing even when economic circumstances would make it sensible, because, they risk losing their right to participate in the future. This definitely contributes to the crowding in the halibut and blackcod fisheries. Although for most participants, these fisheries are a viable and important economic activity. There are traditional management measures that have been ignored, that could benefit the fishery, for example -- tank inspections, and check-ins.

Sincerely,



Oliver N. Holm
President, Kodiak Longliners Association

September 15, 1991

IFQ RESOLUTIONS

ALASKA MUNICIPAL LEAGUE

CITY OF ANCHORAGE

BRISTOL BAY BOROUGH

CITY OF CORDOVA

HAINES CHAMBER OF COMMERCE

CITY OF HOMER

CITY OF KENAI

KENAI PENINSULA BOROUGH

KENAITZE INDIAN TRIBE I.R.A.

KODIAK AREA NATIVE ASSOCIATION

CITY OF KODIAK

KODIAK ISLAND BOROUGH

KODIAK ISLAND MAYORS LEAGUE

OUNALASHKA CORPORATION

CITY OF OUZINKIE

CITY OF SAND POINT

SELDOVIA VILLAGE TRIBE

SEWARD CHAMBER OF COMMERCE

CITY OF SEWARD

SITKA CHAMBER OF COMMERCE

SOUTHWEST ALASKA MUNICIPAL CONFERENCE

CITY OF UNALASKA

CITY OF VALDEZ

CITY OF WHITTIER

WRANGELL COOPERATIVE ASSOCIATION

To	Man Shannon	From	Barb
Co.	City Clerk	Co.	AML
Dept.	Homer	Phone #	586-1325
Fax #	235-3140	Fax #	

EC & RIV-1

Introduced by: Kodiak Island Borough
Date: October 1, 1991

Resolution of the Alaska Municipal League

Resolution No. 92-XX

**A RESOLUTION URGING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
TO ANALYZE AND IMPLEMENT TRADITIONAL MANAGEMENT METHODS PRIOR
TO ANY FURTHER DISCUSSION
OF AN INDIVIDUAL FISHERY QUOTA SYSTEM**

WHEREAS, a number of traditional management proposals have been submitted to the North Pacific Management Council which would potentially eliminate the problems which an Individual Fishery Quota (IFQ) would address, and

WHEREAS, neither the staff of the North Pacific Fishery Management Council nor the Council have reviewed these management proposals, and

WHEREAS, there is no urgency for Individual Fishery Quotas to be implemented without adequately using the administrative process to review all proposals prior to selection and implementation of one management proposal, and

WHEREAS, the Council's role and responsibility are to analyze all proposals on a given issue before implementing major changes to a fishery, and

WHEREAS, analysis and implementation of traditional management proposals to address the problem have not even been reviewed prior to the proposed implementation of an IFQ system, and

WHEREAS, an IFQ system is going to take years to implement and, meanwhile, the fisheries need extensive traditional management changes to short-term improved management;

NOW, THEREFORE, BE IT RESOLVED that the Alaska Municipal League urges the North Pacific Fishery Management Council to analyze and implement traditional management methods prior to any further discussion of an Individual Fishery Quota System.

This resolution was approved for submission to the Alaska Municipal League membership by the governing body of the Kodiak Island Borough on September 19, 1991.

2
3 CLERK'S OFFICE
4 AMENDED AND APPROVED

5 Date: 12-10-91

6 *Vetoed 12/17/91*

7 *Overridden 1-7-92*

8 ANCHORAGE, ALASKA

9 AR NO. 91-267 (AS AMENDED)

Submitted by: Assemblymembers Abney
and Barnett

Prepared by: Assembly Utility Budget
Analyst

For reading: December 10, 1991

10 A RESOLUTION OF THE ANCHORAGE MUNICIPAL ASSEMBLY URGING THE NORTH
11 PACIFIC FISHERIES MANAGEMENT COUNCIL AND ALL OTHER AUTHORITIES TO
12 RESCIND ITS VOTE TO IMPLEMENT THE IFQ PROGRAM TO APPROVE THE
13 INDIVIDUAL TRANSFERABLE QUOTA SHARE PROGRAM FOR THE SABLEFISH AND
14 HALIBUT FISHERIES UNTIL AN ECONOMIC IMPACT ANALYSIS OF THE PROGRAM
15 ON THE MUNICIPALITY OF ANCHORAGE AND OTHER COMMUNITIES OF ALASKA
16 IS COMPLETED AND SHARED WITH THE AFFECTED COMMUNITIES FOR THEIR
17 CONSIDERATION AND COMMENT

18
19
20 WHEREAS, a number of traditional management proposals have been submitted to the
21 North Pacific Fisheries Management Council which would potentially eliminate the problems that
22 an Individual Fishery Quota (IFQ) would address; and

23
24 WHEREAS, the Council's role and responsibility is to analyze all proposals on a given
25 issue before implementing major changes to a fishery; and

26
27 WHEREAS, analysis and implementation of traditional management proposals to address
28 the problems have not even been reviewed prior to the proposed implementation of an IFQ
29 System; and

30
31 WHEREAS, an IFQ System is going to take years to implement while the fisheries need
32 extensive traditional management changes not short-term improved management; and

33
34 WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic
35 and resource conditions are vital characteristics of the Alaska fishing industry; and

36
37 WHEREAS, IFQ Systems under consideration provide much of the resource to be
38 allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen, of
39 which over 500 abide in Anchorage, and preclude participation by the growing Alaska longline
40 fishing fleet; and

41
42 WHEREAS, IFQ Systems will deny the opportunity for residents of the Municipality of
43 Anchorage and other Alaskan communities to fully diversify and maximize their fisheries creating
44 financial hardships and creating economic impacts; and

45
46 WHEREAS, IFQ Systems could accommodate offshore processors which will minimize
47 the raw fish tax to Alaskan communities and the State.

NOW, THEREFORE, the Anchorage Assembly resolves:

Section 1: That the Alaska State Legislature and the Governor intercede on behalf of Alaska fishermen to prevent any negative economic impact or hardship on them and affected Alaska communities as a result of the IFQ System.

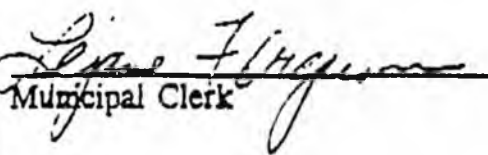
Section 2: That the North Pacific Fishery Management Council rescind its vote to implement the IFQ Program, carefully scrutinize this proposal including its impact on Alaska fishermen and communities, and implement traditional management methods prior to any further discussion on an IFQ System.

Section 3: That copies of this resolution be sent to Governor Walter J. Hickel, the North Pacific Fishery Management Council, Anchorage area Senators and Representatives, Senators Stevens and Murkowski, and Representative Young.

PASSED AND APPROVED by the Anchorage Assembly this 10th day
December, 1991.


Chairman

ATTEST:


Municipal Clerk

TAW:egj
DOCC/AR47

LETTERMAN
BOROUGH MANAGER



TELEPHONE
(907) 248-4224
FAX
(907) 248-8833

Bristol Bay Borough

BOX 188 • NAKNEK, ALASKA 99833

NOV 25 1991

November 25, 1991

Mr. Rick Lauber, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Chairman Lauber,

The villages of the Bristol Bay Borough; King Salmon, Naknek and South Naknek, oppose the Individual Fisherman's Quota system for halibut management currently being considered by the Council.

The Bristol Bay experimental halibut fishery is only two seasons old. Local area fishermen have not yet had time to establish themselves in this new fishery.

With falling sockeye salmon prices, area fishermen must diversity to fill the economic gaps created.

Sincerely,

Fred W. Pike
Mayor

CITY OF CORDOVA



December 2, 1991

Mr. Rick Lauber, Chairman
North Pacific Fisheries Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Chairman Lauber:

I am submitting comments regarding Individual Fisherman's Quotas (IFQ's) on behalf of the Cordova City Council. The Cordova City Council remains very concerned about the impacts an IFQ management scheme would have upon local fishermen, the economy of Cordova and the lifestyle of residents of Cordova. We are aware that you have received a great deal of testimony regarding the expected impacts upon individual fishermen; especially the small boat owners and those just getting into the longline fishery. Our comments will focus on the impacts upon small coastal communities like Cordova; communities whose economy is dependent upon the fishing industry. Following is a list of specific comments:

1. Cordova's economy has historically been based upon the seafood industry. The Exxon Valdez oil spill, world market conditions, and other factors have combined to produce hard economic times for many local fishermen. Local fishermen have always depended on flexibility and the ability to participate in a number of fisheries to make ends meet. Many have gotten involved in the longline fishery over the past decade. Most of these fishermen are small boat owners, but they have made substantial investments in longline gear and equipment and have been working hard to increase their catch each year. An IFQ system would hurt these fishermen because it would "lock" them into a quota. In most cases, this quota would be so small that they couldn't afford to fish it. The only rational economic decision for people in this position is to sell their quotas. Other fishermen who planned to get into the fishery or who have only fished it the last few years could be locked out completely. This means a loss of jobs and income and reduced revenue from raw fish and sales taxes.

2. Local processors have been gearing up to handle increased deliveries of halibut and black cod. If IFQ's go into effect, the likely outcome is that it will become uneconomic for the processors to handle these fish because deliveries from local boats will decline. Again, this translates into a loss of local jobs and a loss of tax revenue for the community.

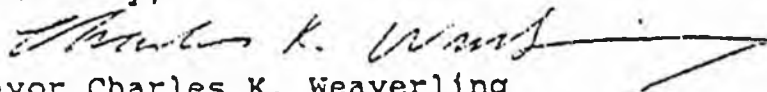
North Pacific Fisheries Management Council
December 2, 1991
Page 2

3. The Council has set aside Community Development Quota's (CDQ's) for disadvantaged communities in the Bering Sea. CDQ's are designed to prevent communities who have not yet participated in those fisheries from being locked out if an IFQ scheme limits access in 1993. Those longliners displaced by Bering Sea CDQ allocations will be given shares of the Gulf of Alaska quota. We have two comments about this. First, we believe that compensating longliners who are displaced in the Bering Sea with Gulf of Alaska shares is unfair to Prince William Sound Fishermen who are just getting into the fishery. This also has the effect of driving local fishermen out of the business because there will be less poundage available for harvest in the Gulf. Second, we would argue that Cordova should be eligible for a CDQ also since it has great potential to participate in the longline fishery but is likely to be locked out under the IFQ scheme. Cordova is just beginning to emerge as an important bottomfish port.

In summary, the Cordova City Council believes that an IFQ system will have very definite winners and losers. The losers will be small boat owners, people just getting into the fishery, and fishing communities like Cordova. We would urge the North Pacific Fisheries Management Council to look very closely at more traditional management schemes. We understand that management is necessary to protect the resource, to reduce waste, and to increase safety. However, we see no need to rush into an IFQ system; a system which has not yet proven itself in other areas of the world. For example, evidence from the east coast of Canada and New Zealand suggests increasing conservation problems, enforcement problems, and economic disaster for many inshore fishermen and the communities they live in.

Thank you for the opportunity to comment. Please contact us if you have any questions or need more information.

Sincerely,



Mayor Charles K. Weaverling
City of Cordova, Alaska

CITY OF CORDOVA, ALASKA

RESOLUTION 91-47

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CORDOVA, ALASKA
SUPPORTING OPEN ACCESS IN THE SABLEFISH AND OTHER FISHERIES
IN THE EXCLUSIVE ECONOMIC ZONE OFF ALASKA

WHEREAS, THE North Pacific Fishery Management Council is developing detailed options for implementing a sablefish individual fishing quota (IFQ) system, and is also considering a moratorium on entry for all fisheries under Council jurisdiction; and

WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and

WHEREAS, individual fishing quotas may deny the opportunity for residents of coastal communities to fully diversify and maximize their fisheries; and

WHEREAS, individual fishing quota programs under consideration provide for much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen and preclude participation by the growing Alaska longline fishing fleet; and

WHEREAS, the trend will be to process groundfish offshore which will minimize the raw fish tax to coastal communities and the state; and

WHEREAS, limited access programs restrict the free enterprise system by not allowing commercial fishermen to maximize their potential in the fishery; and

WHEREAS, limited access does not address several more fundamental management problems.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Cordova, Alaska respectfully requests the Governor take whatever action is necessary to protect the rights of Alaska fishermen and to vigorously oppose any effort to implement limited entry in the sablefish and other fisheries in Alaska.

BE IT FURTHER RESOLVED that the North Pacific Fishery Management Council is respectfully requested to abandon their initiative to impose a moratorium on all fisheries under Council jurisdiction.

JUN 20 11 10 45 DUNDAS CITY HALL

Resolution 91-47

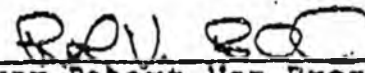
Page 2

BE IT FURTHER RESOLVED the North Pacific Fishery Council is respectfully requested to not impose a sablefish IFQ system.

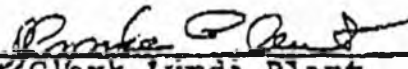
BE IT FURTHER RESOLVED the North Pacific Fishery Council is requested to continue the open access (status quo) management of the sablefish and other fisheries under Council jurisdiction.

AND, BE IT FURTHER RESOLVED that if the Council recommends the adoption of limited access in the groundfisheries, then the Secretary of Commerce is respectfully requested to reject their recommendation.

PASSED AND APPROVED THIS 21st DAY OF JUNE, 1991.



Mayor Robert Van Brocklin



City Clerk Lynda Plant

Haines Chamber of Commerce

2nd & Willard Streets
P.O. Box 518 • Haines, Alaska 99827



December 18, 1991

DEC 23 1991

North Pacific Fishery Management Council
4111 W. 4th, Suite 2D
P. O. Box 103136
Anchorage, Alaska 99510

RE: Proposed Halibut IFQ System

Dear Members of the Management Council:

The Haines Chamber of Commerce has been following the progress of your Council in the development of an individual fisherman's quota (IFQ) system for halibut. Of extreme concern to the Haines Chamber is the proposal that only 10 official ports be allowed for the legal landing of halibut. Because Haines would certainly not be included, this would highly disadvantage the community for the following reasons.

1. Haines, a coastal fishing community, depends upon direct access to the halibut harvested by the Haines commercial longline fleet. On some years over a million dollars worth of halibut have been harvested by the Haines fleet alone. There are around 90 local catcher/processor vessels, and 7 custom processing plants in Haines working hard to add value to the halibut by creating products and marketing those products.
2. The economic development plans for Haines call for an increased effort to add value to halibut and further stimulate economic development within the community. Haines has few other options for an economic base and sudden removal of direct access to the halibut caught by the local commercial fleet would be an economic disaster to a small community of 1500 people such as ours.
3. Tens of thousands of pounds of halibut harvested annually by the local fleet are sold fresh for food to residents of Haines and Skagway.

North Pacific Fishery Management Council
December 18, 1991, Page 2

This provides direct access to this excellent food fish for the local population when the fish is still fresh and most desirable for consumption. The price is also very reasonable for the resident population, rather than paying the highly inflated retail prices for halibut landed at a distant port and handled by large processors and the whole marketing infrastructure.

Under any IFQ system, it must remain legal for the commercial fleet of Haines to land halibut in this community to continue the socioeconomic progress which has been made to date and maintain the life-style of the community. Losing legal landing port status would be an economic disaster for the community of Haines. Many people could not afford to eat halibut if available only frozen at inflated prices, and the commercial fleet would be at the mercy of the large processors and could not add value to their catch by creative product development and marketing of the fish.

The Haines Chamber of Commerce appreciates your attention to this letter and our expressions of concern on halibut IFQ issues which will affect our entire community. It is hard to find the wisdom of excluding Haines from legal commercial halibut landings, as the loss in income and quality of life within the community would be very devastating.

Sincerely,

Patty A. Glackin

Patty A. Glackin, President

cc: Senators Stevens & Murkowski, Representative Don Young,
Alaska Senator Eliason, Alaska Representative Jerry Mackie,
Governor Walter Hickel, Carl Rozier, Commissioner ADF&G.

CITY OF HOMER
HOMER, ALASKA

RESOLUTION 91-82

A RESOLUTION OF THE HOMER CITY COUNCIL REQUESTING THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL AND ALL OTHER AUTHORITIES NOT TO APPROVE THE INDIVIDUAL TRANSFERABLE QUOTA SHARE QUOTA PROGRAM FOR THE SABLEFISH AND HALIBUT FISHERIES UNTIL AN ECONOMIC IMPACT ANALYSIS OF THE PROGRAM ON THE COASTAL COMMUNITIES OF ALASKA IS COMPLETED AND SHARED WITH THE AFFECTED COMMUNITIES FOR THEIR CONSIDERATION AND COMMENT.

WHEREAS, the proposed Individual Transferable Quota program for the halibut and sablefish fisheries anticipates a one half (1/2) to two thirds (2/3) reduction in the participating fishing vessel fleets; and

WHEREAS, in addition to the loss of jobs directly associated with the reduced number of vessels, the structure of the allocation of shares will result in the utilization of many fewer deckhands from the community on boats that continue in the fishery; and

WHEREAS, the halibut fishery represents a significant portion of many deckhand's disposable income; and

WHEREAS, the structure of the ITQ program may lead to a continuous shift in the ownership of the fishery resource to individuals outside the Homer community; and

WHEREAS, the City Homer heavily relies on the flow of commercial fishing dollars for its economic vitality and health; and

WHEREAS, loss of vessels from the Homer Harbor could negatively impact the City's revenues; and

WHEREAS, continuous near shore halibut fishing close to Homer may result in diminished local stocks and gear conflicts with negative impact on the local sport charter fleet; and

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Homer, Alaska requests that North Pacific Fisheries Management Council and all other authorities not to approve the Individual Transferable Quota Share Quota Program for the sablefish and halibut fisheries until an economic impact analysis of the program on the coastal communities of Alaska is completed and shared with the affected Communities for their consideration and comment; and

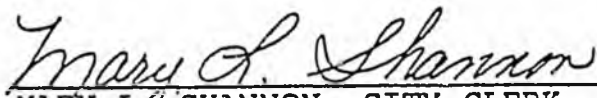
BE IT FURTHER RESOLVED that the City Clerk send copies of this resolution to the North Pacific Fisheries Management Council, Governor Hickle, Senator Murkowski, Senator Stevens, Representative Young, Federal Department of Commerce and the State Department of Community and Regional Affairs.

ADOPTED AND PASSED this 25th day of November, 1991 by the Homer City Council.

CITY OF HOMER


HARRY E. GREGOIRE, MAYOR

ATTEST:


MARY L. SHANNON, CITY CLERK

COPY

C-5

Suggested By: Mayor Williams on
behalf of the
Fishing Community

CITY OF KENAI

RESOLUTION 92-2

A RESOLUTION OF THE COUNCIL OF THE CITY OF KENAI, ALASKA, REQUESTING THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL AND ALL OTHER AUTHORITIES NOT TO APPROVE THE INDIVIDUAL TRANSFERABLE QUOTA SHARE QUOTA PROGRAM FOR THE SABLEFISH AND HALIBUT FISHERIES UNTIL AN ECONOMIC IMPACT ANALYSIS OF THE PROGRAM ON THE COASTAL COMMUNITIES OF ALASKA IS COMPLETED AND SHARED WITH THE AFFECTED COMMUNITIES FOR THEIR CONSIDERATION AND COMMENT.

WHEREAS, the proposed Individual Transferable Quota program for the halibut and sablefish fisheries anticipates a one-half (1/2) to two-thirds (2/3) reduction in the participating fishing vessel fleets; and,

WHEREAS, in addition to the loss of jobs directly associated with the reduced number of vessels, the structure of the allocation of shares will result in the utilization of many fewer deckhands from the community on boats that continue in the fishery; and,

WHEREAS, the halibut fishery represents a significant portion of many deckhands' disposable income; and,

WHEREAS, the structure of the ITQ Program may lead to a continuous shift in the ownership of the fishery resource to individuals outside the City of Kenai and Cook Inlet; and,

WHEREAS, the City of Kenai relies on the flow of commercial fishing dollars for its economic vitality and health; and,

WHEREAS, loss of vessels from Kenai could negatively impact the City's revenues; and,

WHEREAS, continuous near-shore halibut fishing in the Cook Inlet may result in diminished local stocks and gear conflicts with negative impact on the Kenai Cook Inlet sport charter fleet.

NOW THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, that the North Pacific Fisheries Management Council and all other authorities be requested not to approve the Individual Transferable Quota Share Quota Program for the sablefish and halibut fisheries until an economic impact analysis of the program on the coastal communities of Alaska is completed and shared with the affected communities for their consideration

Y9903
COPY

BE IT FURTHER RESOLVED, that the City Clerk send copies of this resolution to the North Pacific Fisheries Management Council, Governor Hickel, Senators Stevens and Murkowski, Representative Young, Federal Department of Commerce and the State Department of Community and Regional Affairs.

PASSED BY THE COUNCIL OF THE CITY OF KENAI, ALASKA, the 15th day of January, 1992.

John J. Williams, Mayor

ATTEST:

Carol L. Freas, City Clerk

Introduced by: Walli and Skogstad
Date: 11/19/91
Action: Adopted
Vote: Unanimous

KENAI PENINSULA BOROUGH
RESOLUTION 91-138

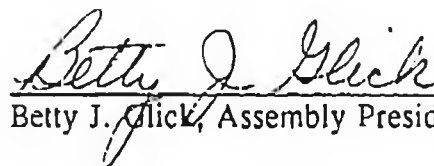
**A RESOLUTION URGING THE NORTH PACIFIC FISHERY MANAGEMENT
COUNCIL TO ANALYZE AND IMPLEMENT TRADITIONAL MANAGEMENT
METHODS PRIOR TO ANY FURTHER DISCUSSION OF
AN INDIVIDUAL FISHERY QUOTA SYSTEM**

- WHEREAS, a number of traditional management proposals have been submitted to the North Pacific Management Council which would potentially eliminate the problems which an Individual Fishery Quota (IFQ) would address; and
- WHEREAS, there is no urgency for Individual Fishery Quotas to be implemented without adequately using the administrative process to review all proposals prior to selection and implementation of one management proposal; and
- WHEREAS, the Council's role and responsibility is to analyze all proposals on a given issue before implementing major changes to a fishery; and
- WHEREAS, analysis and implementation of traditional management proposals to address the problems have not even been reviewed prior to the proposed implementation of an IFQ system; and
- WHEREAS, an IFQ system is going to take years to implement while the fisheries need extensive traditional management changes not short-term improved management; and
- WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and
- WHEREAS, IFQ programs under consideration provide much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen and preclude participation by the growing Alaska longline fishing fleet; and
- WHEREAS, IFQ programs will deny the opportunity for residents of Alaskan coastal communities to fully diversify and maximize their fisheries creating financial hardships and creating economic impacts; and
- WHEREAS, IFQs could accommodate offshore processors which will minimize the raw fish tax to Alaskan coastal communities and the State;

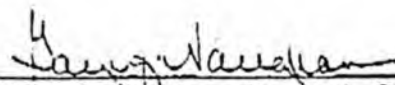
NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH:

- Section 1. That the Kenai Peninsula Borough Assembly respectfully requests the Alaska State Legislature and the Governor analyze the economic impact and hardship of the Alaskan fishermen and Alaskan coastal communities created by the proposed IFQ system.
- Section 2. That the North Pacific Fishery Management Council analyze and implement traditional management methods prior to any further discussion on an IFQ system.
- Section 3. That copies of this resolution be sent to Governor Walter J. Hickel, the North Pacific Fishery Management Council, Alaska Senators Paul Fischer, Jay Kerttula and Curt Menard, and Alaska Representatives Gail Phillips, Mike Navarre and Gene Kubina.

ADOPTED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH THIS 19th DAY OF NOVEMBER, 1991.


Betty J. Glick, Assembly President

ATTEST:


Gaye J. Vaughan, Borough Clerk

JAN 17 '92 15:58 FROM NARF ANCHORAGE

PAGE.001

Kenaitze Indian Tribe I.R.A.

P.O. BOX 988
KENAI, ALASKA 99611
(907) 283-3633
Fax (907) 283-3052

RESOLUTION 92-01

WHEREAS, the economic well being of coastal Alaska communities is vital to the continued health and existence of those communities; and,

WHEREAS, the coastal communities of Alaska are the homelands of many Alaska Native Aleuts, Indians, and Eskimos and the seats of their respective cultures; and

WHEREAS, economic as well as subsistence economies are vital components necessary for our respective Native cultures to remain viable and to flourish; and,

WHEREAS, the endorsement of Individual Fishing Quotas (IFQ) and Community Development Quotas (CDQ) by the National Marine Fisheries Service (NMFS) has the realistic potential to force Native and other Alaska based fisherman out of the fishing business and to prevent future generations of Alaska Natives and other Alaskans from participating in the bottom fisheries; and


WHEREAS, IFQ's and CDQ's may cause severe negative impacts upon our coastal communities resulting in unemployment, outmigration, and, in some instances, the abandonment of Native villages which could signal cultural destruction and increase the incidence of Native suicides and destructive behavior due to a loss of identity; and,

WHEREAS, the concept of IFQ's and CDQ's may result in the continued depletion of marine resources which would affect Native subsistence opportunities; now,

THEREFORE BE IT RESOLVED that the Kenaitze Indian Tribes tribal council, by unanimous consent, is opposed to the concept of IFQ's and CDQ's as currently envisioned; and

BE IT FURTHER RESOLVED that the tribe endorses House Joint Resolution 61 which would put the Alaska legislature on record in opposition to IFQ's and CDQ's.

DATED: January 17, 1992


Paul Swetsof, Council Member
Kenaitze Indian Tribe

**Kodiak
Area
Native
Association**



402 Center Avenue
Kodiak, Alaska 99615
Phone (907) 486-5725

June 14, 1991

Mr. Rick Lauber, Chairman
NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
P.O. Box 103136
Anchorage, Ak 99510

RE: Sablefish and Halibut IFQs

Chairman Lauber:

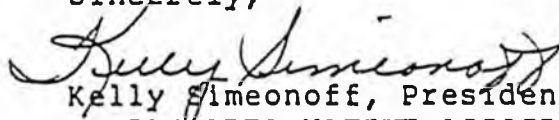
The Kodiak Area Native Association serves the Native people in the coastal communities on Kodiak Island.

Since the implementation of the limited entry system of management many Native people of Kodiak have been excluded from the opportunity to earn a respectable living from the water which is at the center of our culture and has been for over four thousand years.

We find that access to fisheries resources is extremely difficult to regain after lost and at the root of many of our social and economic problems. Sablefish and halibut are two of a dwindling number of fisheries available to the small diversified independent fishermen and their crew members.

We feel that the IFQ management plan will again cause further suffering in our communities to satisfy big money interests in commercial fishing. We are opposed to the IFQ system for managing the sablefish and halibut fisheries and urge you to consider other management options before taking another resource from the coastal communities.

Sincerely,


Kelly Simeonoff, President
KODIAK AREA NATIVE ASSOCIATION

cc: Honorable Walter Hickel
Honorable Ted Stevens
Honorable Frank Murkowski
Honorable Don Young
Senator Fred Zharoff
Rep. Cliff Davidson

Serving the communities of: Akhiok • Karluk • Kodiak • Larsen Bay • Old Harbor • Ouzinkie • Port Lions

RECEIVED FEB 27 1990

CITY OF KODIAK
RESOLUTION NUMBER 07-90

A RESOLUTION OF THE COUNCIL OF THE CITY OF KODIAK SUPPORTING CONTINUED OPEN ACCESS IN THE GROUND FISH FISHERIES IN THE EXCLUSIVE ECONOMIC ZONE OFF ALASKA

WHEREAS, the North Pacific Fishery Management Council is developing detailed options for limited access in the sablefish longline fishery; and

WHEREAS, groundfish including sablefish and halibut is important to the diversified economy of the coastal communities of Alaska and the ability to participate in multiple fisheries and adapt to changing economic and resource conditions is a vital characteristic of the Alaska fishing fleet; and

WHEREAS, individual fishing quotas may deny the opportunity for residents of coastal communities to fully diversify and maximize their fisheries; and

WHEREAS, individual fishing quota programs under consideration provide for much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen and precluding participation by the growing Alaska longline fishing fleet; and

WHEREAS, limited access will prohibit maximum utilization of a natural resource by depriving crew members, processors and other support groups of full participation; and

WHEREAS, the trend will be to process groundfish offshore which will minimize the raw fish tax to coastal communities and the state; and

WHEREAS, limited access programs restrict the free enterprise system by not allowing commercial fishermen to maximize their potential in the fishery; and

WHEREAS, limited access represents a quick-and-easy, but ineffective, solution to more fundamental management problems;

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Kodiak, Alaska, that the Governor is respectfully requested to take whatever action is necessary to protect the rights of Alaska fishermen and to vigorously oppose any effort to implement limited entry in the groundfish fisheries in Alaska.

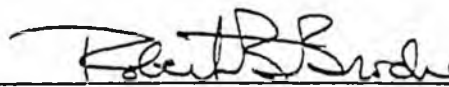
BE IT FURTHER RESOLVED that the North Pacific Fishery Management Council is respectfully requested to abandon all efforts to study, plan, encourage, or recommend implementation of limited access in the groundfish fisheries in Alaska.

AND, BE IT FURTHER RESOLVED that if the council recommends the adoption of limited access in the groundfish fisheries, then the Secretary of Commerce is respectfully requested to reject this recommendation.

AND, BE IT FURTHER RESOLVED that copies of this resolution shall be sent to the Honorable Robert A. Mosbacher, United States Secretary of Commerce; Dr. John A. Knauss, Under Secretary for Oceans and Atmosphere, National Oceanic and Atmospheric Administration, U.S. Department of Commerce; Mr. Steve Penoyer, Regional Director, Alaska Region, National Marine Fisheries Service, Juneau, AK; Dr. William W. Fox, Jr. Assistant Administrator for Fisheries, National Marine Fisheries Service, NOAA; Mr. Don Collinsworth, Chairman, and Mr. Clarence Pautzke, Executive Director of the North Pacific Fishery Management Council; Honorable Steve Cowper, Governor of Alaska; and to the Honorable Ted Stevens and the Honorable Frank Murkowski, U.S. Senators, and the Honorable Don Young, U.S. Representative, members of the Alaska delegation in Congress; and all members of the Alaska State Legislature.

PASSED AND APPROVED this 22nd day of February, 1990.

CITY OF KODIAK


MAYOR

ATTEST:


CITY CLERK

By: Jack McFarland
Introduced: 02/15/90
Adopted: 02/15/90

KODIAK ISLAND BOROUGH
RESOLUTION NO. 90-20

A RESOLUTION SUPPORTING CONTINUED OPEN ACCESS IN
THE SABLEFISH AND OTHER FISHERIES IN THE EXCLUSIVE
ECONOMIC ZONE OFF ALASKA

WHEREAS, the North Pacific Fishery Management Council is developing detailed options for implementing a sablefish individual fishing quota (IFQ) system, and is also considering a moratorium on entry for all fisheries under Council jurisdiction; and

WHEREAS, the ability to utilize sablefish, halibut, and other fisheries species is important to the diversified economy of the coastal communities of Alaska; and

WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and

WHEREAS, individual fishing quotas may deny the opportunity for residents of coastal communities to fully diversify and maximize their fisheries; and

WHEREAS, individual fishing quota programs under consideration provide for much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen and preclude participation by the growing Alaska longline fishing fleet; and

WHEREAS, limited access will prohibit maximum utilization of a natural resource by depriving crew members, processors and other support groups of full participation; and

WHEREAS, the trend will be to process groundfish offshore which will minimize the raw fish tax to coastal communities and the state; and

WHEREAS, limited access programs restrict the free enterprise system by not allowing commercial fishermen to maximize their potential in the fishery; and

WHEREAS, limited access does not address several more fundamental management problems;

NOW, THEREFORE, BE IT RESOLVED by the Kodiak Island Borough Assembly that the Governor is respectfully requested to take whatever action is necessary to protect the rights of Alaska fishermen and to vigorously oppose any effort to implement limited entry in the sablefish and other fisheries in Alaska; and

BE IT FURTHER RESOLVED that the North Pacific Fishery Management Council is respectfully requested to abandon their initiative to impose a moratorium on all fisheries under Council jurisdiction; and

BE IT FURTHER RESOLVED the North Pacific Fishery Management Council is respectfully requested to not impose a sablefish IFQ system; and

BE IT FURTHER RESOLVED the North Pacific Fishery Council is requested to continue the open access (status quo) management of the sablefish and other fisheries under Council jurisdiction; and

BE IT FURTHER RESOLVED the North Pacific Fishery Council is requested to abandon all efforts to study, plan, encourage or implement limited access in the fisheries under Council jurisdiction.

BE IT FURTHER RESOLVED that if the council recommends the adoption of limited access in the groundfish fisheries, then the Secretary of Commerce is respectfully requested to reject this recommendation.

BE IT FURTHER RESOLVED that copies of this resolution shall be sent to the Honorable Robert A. Mosbacher, United States Secretary of Commerce; Dr. John A. Knauss, Under Secretary for Oceans and Atmosphere, National Oceanic and Atmospheric Administration, U.S. Department of Commerce; Mr. Steve Pennoyer, Regional Director, Alaska Region, National Marine Fisheries Service, Juneau, AK; Dr. William W. Fox, Jr. Assistant Administrator for Fisheries, National Marine Fisheries Service, NOAA; Mr. Don Collinsworth, Chairman, and Mr. Clarence Pautzke, Executive Director of the North Pacific Fishery Management Council; Honorable Steve Cowper, Governor of Alaska; and to the Honorable Ted Stevens and the Honorable Frank Murkowski, U.S. Senators, and

the Honorable Don Young, U.S. Representative, members of the Alaska delegation in Congress; and all members of the Alaska State Legislature.

PASSED AND APPROVED THIS 15th DAY OF FEBRUARY, 1990.

KODIAK ISLAND BOROUGH

James M. Seely
Borough Mayor

Tom E. White
Presiding Officer

ATTEST:

Barbara Gaudin
Borough Clerk

KODIAK ISLAND MAYORS LEAGUE

RESOLUTION 91-15

A RESOLUTION URGING THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL AND ALL OTHER AUTHORITIES TO RESCIND ITS VOTE TO IMPLEMENT THE IFQ PROGRAM TO APPROVE THE INDIVIDUAL TRANSFERRABLE QUOTA SHARE PROGRAM FOR THE SABLEFISH AND HALIBUT FISHERIES UNTIL AN ECONOMIC IMPACT ANALYSIS OF THE PROGRAM ON THE COMMUNITIES OF ALASKA IS COMPLETED AND SHARED WITH THE AFFECTED COMMUNITIES FOR THEIR CONSIDERATION AND COMMENT.

WHEREAS, a number of traditional management proposals have been submitted to the North Pacific Management Council which would potentially eliminate the problems that an Individual Fishery Quota (IFQ) would address; and

WHEREAS, the Council's role and responsibility is to analyze all proposals on a given issue before implementing major changes to a fishery; and

WHEREAS, analysis and implementation of traditional management proposals to address the problems have not even been reviewed prior to the proposed implementation of an IFQ System; and

WHEREAS, an IFQ System is going to take years to implement while the fisheries need extensive traditional management changes, not short-term improved management; and

WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and

WHEREAS, IFQ Systems under consideration provide much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen, and preclude participation by the growing Alaska longline fleet; and

WHEREAS, IFQ Systems will deny the opportunity for residents of the Alaskan communities to fully diversify and maximize their fisheries creating financial hardships and creating adverse economic impacts; and

WHEREAS, IFQ Systems could accommodate offshore processors which will minimize the raw fish tax to Alaskan communities and the State.

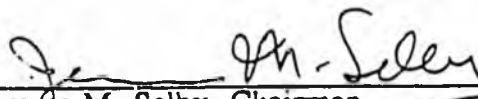
NOW, THEREFORE, BE IT RESOLVED by the Kodiak Island Mayors League, that:

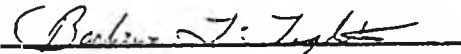
Section 1: The Alaska State Legislature and the Governor intercede on behalf of Alaska fishermen to prevent any negative economic impact or hardship on them and affected Alaska communities as a result of the IFQ System.

Section 2: The North Pacific Fishery Management Council rescind its vote to implement the IFQ Program, carefully scrutinize this proposal including its impact on Alaska fishermen and communities, and implement traditional management methods prior to any further discussion on an IFQ System.

Section 3: Copies of this resolution be sent to Governor Walter J. Hickel, the North Pacific Fishery Management Council, Kodiak area legislators, Senators Stevens and Murkowski, and Representative Young.

PASSED AND APPROVED on this 12th day of December, 1991


Jerome M. Selby, Chairman
Kodiak Island Mayors League 1991

Attest: 

Date: 12-12-91



RECEIVED DEC 23 1991

December 13, 1991


Senator Fred Zharoff
PO Box 405
Kodiak, AK 99615

Re: North Pacific Fisheries Management Council's and other
authorities vote to implement the IFQ Program.

Dear Senator:

Enclosed is the Resolution 91-12-03 of the Ounalashka Corporation
which was faxed to your office December 13, 1991, per the
Ounalashka Corporation Board of Directors and Management.

Thank you,


Wendy A. Svarny
Secretary

enclosure

cc: file

RESOLUTION 91-12-03

OF THE BOARD OF DIRECTORS
OF
OUNALASHKA CORPORATION

A Resolution of the Ounalashka Corporation, a village Corporation located at Unalaska, urges the North Pacific Fisheries Management Council and all other authorities to rescind its vote to implement the IFQ Program approving the Individual Transferable Quota Share Program for the Sable fish and Halibut Fisheries until an economic impact analysis of the program on the City of Unalaska and other communities of Alaska is completed and shared with the affected communities for their consideration and comment.

Whereas, a number of traditional management proposals have been submitted to the North Pacific Fisheries Management Council which would potentially eliminate the problems that an Individual Fishery Quota (IFQ) would address; and

Whereas, the Council's role and responsibility is to analyze all proposals on a given issue before implementing major changes to a fishery; and

Whereas, analysis and implementation of traditional management proposals to address the problems have not even been reviewed prior to the proposed implementation of an IFQ System; and

Whereas, an IFQ System is going to take years to implement while the fisheries need extensive traditional management changes, not short-term improved management; and

Whereas, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and

Whereas, IFQ Systems under consideration provide much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen, of which over 100 abide in Unalaska, and preclude participation by the growing Alaska longline fishing fleet; and

Whereas, IFQ Systems will deny the opportunity for residents of the Municipality of Unalaska and other Alaskan communities to fully diversify and maximize their fisheries creating financial hardships and creating economic impacts; and

Whereas, IFQ Systems could accommodate offshore processors which will minimize the raw fish tax to Alaskan communities and the State.

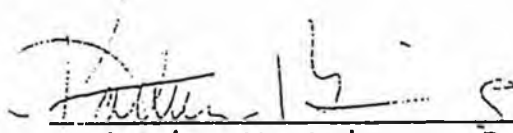
NOW, THEREFORE, the Ounalashka Corporation resolves:

Section 1: That the Alaska State Legislature and the Governor intercede on behalf of Alaska fishermen to prevent any negative economic impact or hardship on them and affected Alaska communities as a result of the IFQ System.

Section 2: That the North Pacific Fishery Management Council rescind its vote to implement the IFQ Program, carefully scrutinize this proposal including its impact on Alaska fishermen and communities, and implement traditional management methods prior to any further discussion on an IFQ System.

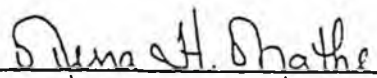
Section 3: That copies of this resolution be sent to Governor Walter J. Hickel, the North Pacific Fishery Management Council, State Senator Zharoff and Representative Jacko, U.S. Senators Stevens and Murkowski, and Representative Young.

PASSED AND APPROVED by the Ounalashka Corporation this 12th day of December, 1991.



Katherine M. Grimnes, President

ATTEST:



Nena H. Mathe, Corporate Secretary

CITY OF OUZINKIE

P. O. BOX 109

OUZINKIE, ALASKA 99644

(907) 680-2209



March 27, 1990

Mr. Clarence Pautzke
Executive Director, NPFMC
P.O. Box 103136
Anchorage, Alaska 99510

Dear Mr. Pautzke,

The majority of the people in the Kodiak Island Area are dependent on our fisheries as they are. It doesn't seem proper that we should have to put up with changing the laws just to please some people from the lower 48 so they can fish on our coast, and take all their profits away from Alaska.

In my opinion Alaska is being used as a scape goat and a guineas pig, just because other States have been used to their extremes they are now trying to do the same thing to Alaskans resources.

The problem with this is that it will have an adverse affect on the fishing industry of Alaska. What I mean is it will keep our fisherman from diversifying to other fisheries if they do not have a limited entry permit.

As with the limited entry on salmon all our younger generation were not able to participate in that fishery unless they could come up with the money to buy out a permit holder if the permit was for sale. The limited entry had taken the freedom of participating in the fisheries, which was our livelihood and if you ask me I think that is unconstitutional.

Therefore I oppose any Moratorium for limited entry of any kind.

Sincerely,

Zack Chichenoff

Zack Chichenoff
Mayor
City of Ouzinkie

CITY OF OUZINKIE
RESOLUTION 90-02

A RESOLUTION OF THE OUZINKIE CITY COUNCIL OPPOSING A
MORATORIUM AND A SABLE FISH IFQ SYSTEM.

WHEREAS, the City of Kodiak and the Kodiak Island Villages
are dependent directly and indirectly on the fishing
industry and;

WHEREAS, the North Pacific Management Council wants to
impose a Moratorium on Participation for all fisheries that
are Federally managed in the Gulf of Alaska and;

WHEREAS, the NPFM Council is deciding whether or not to
impose a limited entry system for sablefish in the GOA and
DS/A or a individual fishery quota limited entry system
(IFQ) and;

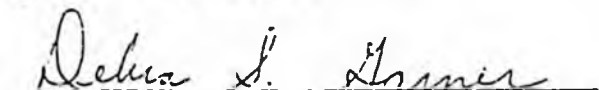
WHEREAS, these NPFM council initiatives are contrary to the
best interest of Kodiak fisherman, processors, processing
plant employees support industries, and villages and;

WHEREAS, these council initiatives will not only negatively
effect fisherman, but also have a detrimental impact on the
future economics of the shore-based processing industry,
Kodiak fisherman and Kodiak Island villages and;

NOW THEREFORE BE IT RESOLVED, that the Ouzinkie City Council
opposes a Moratorium and a limited entry system for sable
fish or any other type of limited entry.

PASSED AND APPROVED this 16th day of March, 1990 at
Ouzinkie, Alaska.


Zack Chichenoff, Mayor
City of Ouzinkie


Attested: Debra Garner, Clerk

cc: Don Collingsworth, NPFMC Chairman
Steve Pennoyer, ARNMFS Director
Dr. John A. Knauss, NOAA
Dr. William W. Fox, Jr., NMFS, NOAA
Robert A. Mosbacher, U.S. DOC
Governor Steve Cowper
Senator Fred Zharoff
Representative Cliff Davidson
Senator Ted Stevens, U.S. Senate
Senator Frank Murkowski, U.S. Senate
Congressman Don Young, U.S. House of Representatives
Lieutenant Governor Stephen McAlpine
Senator Arliss Sturgulewski
Jim Campbell
John Lindauer
Donald Wright
Tony Knowles
Senator Rick Halford
Daniel DeNardo
Ryal White

Fax Transmittal Memo 7872

To: Senator Macoff
Company: A.H. Dawe
Location: Juneau
Fax #: _____ Telephone #: _____

No. of Pages: 1
Today's Date: 9/23/92
Time: 10:40 AM
From: Deputy District City Clerk
Company: City of Sand Point
Location: _____ Dept. Charge: _____
Fax #: _____ Telephone #: _____
Original Disposition: Destroy Return Call for pickup

Res 92-5 077 IFQ'S.

Attach Document At Line

City of Sand Point

P.O. Box 249
Sand Point, Alaska 99661
(907) 383-2696

RESOLUTION 92-5

A RESOLUTION OF THE CITY OF SAND POINT CONCERNING INDIVIDUAL FISHERY QUOTAS

WHEREAS, a number of traditional management proposals have been submitted to the North Pacific Fishery Management Council which would potentially eliminate the problems which an Individual Fishery Quota (IFQ) would address; and

WHEREAS, neither the staff of the North Pacific Fishery Management Council nor the Council have reviewed these management proposals; and

WHEREAS, there is no urgency for Individual Fishery Quotas to be implemented without adequately using the administrative process to review all proposals prior to selection and implementation of one management proposal; and

WHEREAS, analysis and implementation of traditional management proposals to address the problem have not even been reviewed prior to the proposed implementation of an IFQ system; and

WHEREAS, an IFQ system is going to take years to implement and, meanwhile, the fisheries need extensive traditional management changes for short-term improved management;

NOW, THEREFORE, BE IT RESOLVED, by the Sand Point City Council that the Council urges the North Pacific Fishery Management Council to analyze and implement traditional management methods prior to any further discussion of an Individual Fishery Quota system.

PASSED AND APPROVED THIS 17 day of September, 1991.

Stanley J. Miller
Mayor

ATTEST:
Walter A. Bushka
Clerk

Seldovia Village Tribe

P.O. Drawer L

Seldovia, Alaska 99663

(907) 234-7625 Fax: 234-7637

December 2, 1991

To the North Pacific Fishery Management Council,

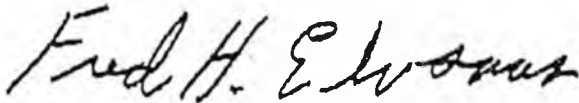
The Seldovia Village Tribe is opposed to the IFQ plan as presented.

This plan if adopted will devastate Villages like Seldovia. The Natives of Seldovia are at an economic disadvantage for being able to participate in the Halibut and Sable Fisheries.

The Fishery is so costly to enter, The Native people have not been able to get into it on a par with 'Outside' boats.

Seldovia Village Tribe needs to be designated and participate in the Community Development quota.

There is no valid reason to limit C.D.Q's to only Western Alaska and prohibit Natives along the Central Gulf of Alaska from participating and growing in this vital fishery.



Fred H. Elvsaas President
Seldovia Village Tribe



Seward Chamber of Commerce

P.O. BOX 749 • SEWARD, ALASKA 99664
PHONE: (907) 224-8051

December 5, 1991

Mr. Richard B. Lauber, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, AK 99510

Dear Mr. Lauber:

May this letter serve as our formal request to delay final implementation of the IFQ until more information has been gathered as to its economic impact on the communities of our state.

I speak on behalf of all of the Chambers of Commerce whose communities may be impacted in an adverse way through this decision and implementation. As you are no doubt aware, from all of the resolutions which have been passed and forwarded on to you, there is grave concern as to the potential negative impact on our fishery and its coastal communities. These concerns are being voiced by our federal congressional delegation, our state legislative representatives and our communities at large.

It would seem that an issue of such potential economic impact on an entire state would be meticulously studied before implementation.

On a more political note, we believe that this issue is so controversial that it could become a liability to President Bush and other politicians during an election year. As emotionally charged and "populist" oriented an issue as this could be manipulated to the disadvantage of the administration, which must pass on the recommendations of the NPFMC.

Because of the importance of this issue and the substantial amount of time spent by Council to develop it, we urge you and other Council members to proceed cautiously, and take serious note of the potential negative impact on our state and its fishery resource before recommending this action to the Administration.

Sincerely,

Wayne D. Carpenter
Executive Director
Seward Chamber of Commerce

WDC:fh

CC: Hon. Ted Stevens
Hon. Frank Murkowski
Hon. Don Young

Sponsored by: Trade Board

CITY OF SEWARD, ALASKA
RESOLUTION NO. 91-144

A RESOLUTION OF THE CITY COUNCIL OF THE CITY
OF SEWARD, ALASKA, URGING THE NORTH PACIFIC FISHERY
MANAGEMENT COUNCIL TO STUDY THE POTENTIAL IMPACTS
ON LOCAL COMMUNITIES PRIOR TO ESTABLISHING AN
INDIVIDUAL FISHERY QUOTA (IFQ) SYSTEM

WHEREAS, the North Pacific Fishery Management Council (NPFMC) is considering the implementation of an Individual Fishery Quota (IFQ) system in Alaska; and

WHEREAS, the NPFMC has not assessed the potential economic impacts such a system would have on the state of Alaska or on local communities which rely on the fishing industry as a major local employer; and

WHEREAS, it is in the public interest to require such a study prior to the implementation of the IFQ system;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SEWARD, ALASKA, that:

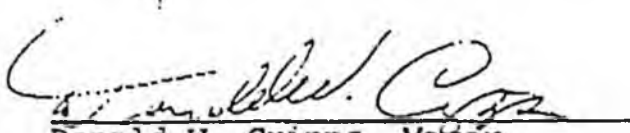
Section 1. The North Pacific Fishery Management Council is hereby urged to conduct a study of the economic impacts of the proposed IFQ system on Alaska and local communities prior to its implementation.

Section 2. A copy of this resolution shall be forwarded to Governor Hickel, Senators Stevens and Murkowski, Representative Young and the North Pacific Fishery Management Council.

Section 3. This resolution shall take effect immediately upon its adoption.

PASSED AND APPROVED by the City Council of the city of Seward, Alaska, this 25th day of November, 1991.

THE CITY OF SEWARD, ALASKA


Donald W. Cripps, Mayor

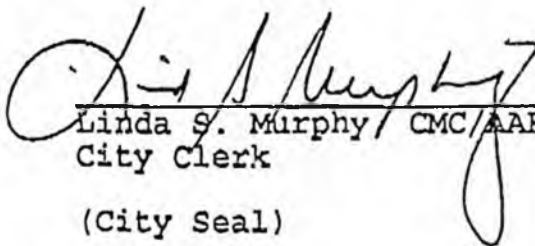
CITY OF SEWARD, ALASKA
RESOLUTION NO. 91-144

AYES: Burgess, Crane, Cripps, Dunham, Krasnansky, Swartz, White
NOES: None
ABSENT: None
ABSTAIN: None

ATTEST:

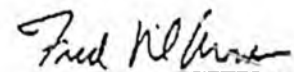
APPROVED AS TO FORM:

Perkins Coie, Attorneys for the
city of Seward, Alaska



Linda S. Murphy CMC/AAB
City Clerk

(City Seal)



Fred B. Arvidson
City Attorney



THE 1 GREATER 1 SITKA
chamber
OF COMMERCE

Box 638 · Sitka, Alaska 99835
(907) 747-8604

January 15, 1992

Secretary of Commerce Robert Mosbacher
15th & Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary of Commerce Mosbacher;

As a representative of the Greater Sitka Chamber of Commerce I would like to address the topic of the individual fishing quota system as proposed by the North Pacific Fisheries Management Council.

The Individual Fishing Quota System as proposed by the council has the potential to deny Sitka residents the opportunity to be diverse and could possibly cause financial hardship and create an economic impact in Sitka, Southeast Alaska, and other Alaskan communities.

The Greater Sitka Chamber of Commerce asks that an economic impact analysis of the program on the municipality of Sitka and other communities of Alaska be completed and that no action or approval of the plan be taken by the North Pacific Fisheries Management Council until at which time the results of the study are returned and can be analyzed by the affected communities for their consideration and comment.

Thank you for your consideration in this matter. I await your reply.

Sincerely,

Edward Malewski
President

EM/sh

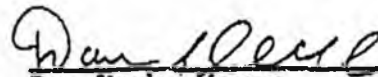
cc: Senator Ted Stevens
Senator Frank Murkowski
Representative Don Young
North Pacific Fisheries Management Council

SPONSOR: Hallgren/Fager

RESOLUTION NO. 91-487

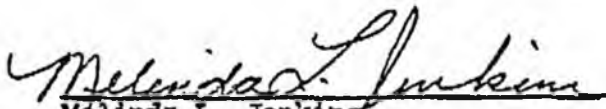
BE IT RESOLVED THAT THE CITY AND BOROUGH OF SITKA REQUESTS THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL AND ALL OTHER AUTHORITIES NOT TO APPROVE THE INDIVIDUAL FISHING QUOTA PROGRAM FOR THE SABLEFISH AND HALIBUT FISHERIES UNTIL AN ECONOMIC AND SOCIAL IMPACT ANALYSIS OF THE PROGRAM ON THE COASTAL COMMUNITIES OF ALASKA IS COMPLETED AND SHARED WITH THE AFFECTED COMMUNITIES FOR THEIR CONSIDERATION AND AFTER PUBLIC HEARINGS ON THE SPECIFIC INDIVIDUAL FISHING QUOTAS PROPOSED ARE HELD IN AFFECTED COASTAL COMMUNITIES

PASSED, APPROVED AND ADOPTED BY THE ASSEMBLY OF THE CITY AND BOROUGH OF SITKA THIS 29th DAY OF NOVEMBER, 1991.



Dan Keck, Mayor

ATTEST:



Melinda L. Jenkins
Municipal Clerk



Southwest Alaska Municipal Conference

Putting Resources to Work For People

3300 Arctic Blvd., Suite 203 • Anchorage, Alaska 99503 • (907) 562-7380 • FAX (907) 562-0438

RESOLUTION 91-1

SOUTHWEST ALASKA MUNICIPAL CONFERENCE

INDIVIDUAL FISHERY QUOTA RESOLUTION

WHEREAS, a number of traditional management proposals have been submitted to the North Pacific Fishery Management Council which would potentially eliminate the problems which an Individual Fishery Quota (IFQ) would address; and

WHEREAS, the staff of the North Pacific Fishery Management Council nor the Council have reviewed these management proposals; and

WHEREAS, there is no urgency for Individual Fishery Quotas to be implemented without adequately using the administrative process to review all proposals prior to selection and implementation of one management proposal; and

WHEREAS, the Council's role and responsibility is to analyze all proposals on a given issue before implementing major changes to a fishery; and

WHEREAS, analysis and implementation of traditional management proposals to address the problem have not even been reviewed prior to the proposed implementation of an IFQ system; and

WHEREAS, an IFQ system is going to take years to implement and, meanwhile, the fisheries need extensive traditional management changes for short-term improved management;

NOW, THEREFORE, BE IT RESOLVED, that the membership of the Southwest Alaska Municipal Conference urges the North Pacific Fishery Management Council to analyze and implement traditional management methods prior to any further discussion of an Individual Fishery Quota system.

PASSED AND APPROVED THIS NINTH DAY OF SEPTEMBER, 1991

Marideth Sandler, Executive Director

Chow/Taylor, President

Requested By: Councilperson Madsen

Ayes: 5Nays: 1CITY OF UNALASKA
UNALASKA, ALASKA

RESOLUTION 91-43

A RESOLUTION OF THE CITY OF UNALASKA OPPOSING THE INDIVIDUAL
TRANSFERABLE QUOTA SHARES SYSTEM FOR MANAGING THE SABLEFISH
AND HALIBUT FISHERIES WITHIN THE JURISDICTION OF THE NORTH
PACIFIC FISHERIES MANAGEMENT COUNCIL

WHEREAS: The North Pacific Fisheries Management Council need to propose a "Preferred" plan which can be specifically reviewed and critiqued by all Industry participants; and

WHEREAS: Any drastic Management change demands the preparation of a Socio-Economic Impact Analysis. Detailed to realistically show the effects of such a management system upon the fisherman and the coastal communities which will be impacted; and

WHEREAS: The conservation concerns within these specific longline fisheries will not be addressed nor solved by this system of management; and

WHEREAS: The Funding source, the enforcement costs and plans are as of yet unknown. This critical area must be addressed and specified; and

WHEREAS: The Quota Shares System has demonstrated the adverse impacts upon the small to mid-sized vessels which participate within such systems; and

WHEREAS: The small to mid-size vessels of our coastal communities may well lose their access to their resource, and as our State's economy is not nearly as diverse as that of other State's those, losing their access to the resource, may force them to seek opportunity outside of their Home State; and

WHEREAS: There is no mechanism to realistically prevent Foreign interest domination of the Quota Shares; and

WHEREAS: A comprehensive plan is necessary to avoid the additional pressure which will be put upon those fisheries outside of the Quota system by those fisherman not receiving sufficient shares to compete; thus complicating and compounding the problems within these other fisheries; and

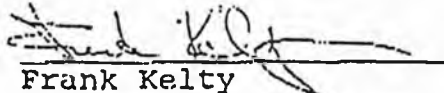
WHEREAS: The additional pressures will adversely affect the safety of the participants within these other fisheries; nor is there any guarantee that Quota Shares will increase the Safety of the participants within the fisheries which assume the Quota System;

and

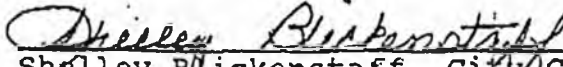
WHEREAS: The North Pacific Fisheries Management Council has identified over 20 management tools which are within the traditional system which have not been sufficiently analyzed or assessed for effectiveness.

NOW THEREFORE BE IT RESOLVED THAT: The City Council of the City of Unalaska, Alaska, opposes the INDIVIDUAL TRANSFERABLE QUOTA SHARES SYSTEM (ITQ) for the management of the Sablefish and Halibut Fisheries.

PASSED AND APPROVED THIS 20th DAY OF June, 1991 BY THE CITY COUNCIL OF THE CITY OF UNALASKA, ALASKA.


Frank Kelty
Mayor

ATTEST:


Shelley Blichenstaff, City Clerk

CITY OF UNALASKA
UNALASKA, ALASKA

RESOLUTION NO. 91-112

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF UNALASKA URGING THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL AND ALL OTHER AUTHORITIES TO RESCIND ITS VOTE TO IMPLEMENT THE IFQ PROGRAM TO APPROVE THE INDIVIDUAL TRANSFERABLE QUOTA SHARE PROGRAM FOR THE SABLEFISH AND HALIBUT FISHERIES UNTIL AN ECONOMIC IMPACT ANALYSIS OF THE PROGRAM ON THE CITY OF UNALASKA AND OTHER COMMUNITIES OF ALASKA IS COMPLETED AND SHARED WITH THE AFFECTED COMMUNITIES FOR THEIR CONSIDERATION AND COMMENT.

WHEREAS, a number of traditional management proposals have been submitted to the North Pacific Fisheries Management Council which would potentially eliminate the problems that an Individual Fishery Quota (IFQ) would address; and

WHEREAS, the North Pacific Fisheries Management Council's role and responsibility is to analyze all proposals on a given issue before implementing major changes to a fishery; and

WHEREAS, analysis and implementation of traditional management proposals to address the problems have not even been reviewed prior to the proposed implementation of an IFQ System; and

WHEREAS, an IFQ System is going to take years to implement while the fisheries need extensive traditional management changes not short-term improved management; and

WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and

WHEREAS, IFQ Systems under consideration provide much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen, and preclude participation by the growing Alaska longline fishing fleet; and

WHEREAS, IFQ Systems will deny the opportunity for residents of the City of Unalaska and other Alaskan communities to fully diversify and maximize their fisheries creating financial hardships and creating economic impacts; and

WHEREAS, IFQ Systems could accommodate offshore processors which will minimize the raw fish tax to Alaskan communities and the State of Alaska; and

WHEREAS, The City of Unalaska adopted Resolution No. 91-43 on June 20, 1991 opposing the IFQ system for managing the sablefish and halibut fisheries within the jurisdiction of the North Pacific Fisheries Management Council, a copy of which is attached.

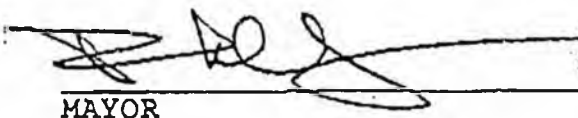
CITY OF UNALASKA
RESOLUTION NO. 91-112
PAGE TWO

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF UNALASKA that the Alaska State Legislature and the Governor intercede on behalf of Alaska fishermen to prevent any negative economic impact or hardship on them and affected Alaska communities as a result of the IFQ system.


BE IT FURTHER RESOLVED BY THE CITY COUNCIL OF THE CITY OF UNALASKA that the North Pacific Fishery Management Council rescind its vote TO IMPLEMENT THE IFQ PROGRAM, and carefully scrutinize this proposal including its impact on Alaska fishermen and communities, and implement traditional management methods prior to any further discussion on an IFQ System.

BE IT FURTHER RESOLVED BY THE CITY COUNCIL OF THE CITY OF UNALASKA that copies of this resolution be sent to Governor Walter J. Hickel, the North Pacific Fishery Management Council, District 26 Representative George Jacko, District 26 Senator Fred Zharoff, U.S. Senators Stevens and Murkowski, and U.S. Representative Young.

PASSED AND ADOPTED BY A DULY CONSTITUTED QUORUM OF THE CITY COUNCIL OF THE CITY OF UNALASKA THIS 12 DAY OF December, 1991.


MAYOR

ATTEST:


CLERK

CITY OF VALDEZ, ALASKA

RESOLUTION NO. 91-80

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, SUPPORTING OPEN ACCESS IN THE SABLEFISH AND OTHER FISHERIES IN THE EXCLUSIVE ECONOMIC ZONE OFF ALASKA

WHEREAS, the North Pacific Fishery Management Council is developing detailed options for implementing a sablefish individual fishing quota (IFQ) system, and is also considering a moratorium on entry for all fisheries under Council jurisdiction; and

WHEREAS, the ability to participate in multiple fisheries and adapt to changing economic and resource conditions are vital characteristics of the Alaska fishing industry; and

WHEREAS, individual fishing quotas may deny the opportunity for residents of coastal communities to fully diversify and maximize their fisheries; and

WHEREAS, individual fishing quota programs under consideration provide for much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaska fishermen and preclude participation by the growing Alaska longline fishing fleet; and

WHEREAS, the trend will be to process groundfish offshore which will minimize the raw fish tax to coastal communities and the state; and

WHEREAS, limited access programs restrict the free enterprise system by not allowing commercial fishermen to maximize their potential in the fishery; and

WHEREAS, limited access does not address several more fundamental management problems.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Valdez, Alaska, respectfully requests the Governor to take whatever action is necessary to protect the rights of Alaska fishermen and to vigorously oppose any effort to implement limited entry in the sablefish and other fisheries in Alaska.

BE IT FURTHER RESOLVED that the North Pacific Fishery Management Council is respectfully requested to abandon their initiative to impose a moratorium on all fisheries under Council jurisdiction.

BE IT FURTHER RESOLVED that the North Pacific Fishery Council is respectfully requested to not impose a sablefish IFQ system.

CITY OF VALDEZ, ALASKA
RESOLUTION NO. 9160

BE IT FURTHER RESOLVED that the North Pacific Fishery Council is requested to continue the open access (status quo) management of the sablefish and other fisheries under Council jurisdiction.

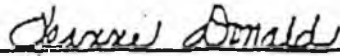
AND, BE IT FURTHER RESOLVED that if the Council recommends the adoption of limited access in the groundfisheries, the Secretary of Commerce is respectfully requested to reject their recommendation.

PASSED AND APPROVED BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, this 1st day of July, 1991.

CITY OF VALDEZ, ALASKA


Lynn Chrystal, Mayor

ATTEST:


Jeanne Donald, CMC, City Clerk

CITY OF WHITTIER, ALASKA
RESOLUTION 264-92

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF WHITTIER, ALASKA SUPPORTING TRADITIONAL MANAGEMENT METHODS IN SABLE FISH, HALIBUT AND OTHER FISHERIES, AND URGING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TO REVIEW, ANALYZE AND IMPLEMENT TRADITIONAL MANAGEMENT METHODS.

WHEREAS, The North Pacific Fishery Management Council is developing detailed options for implementing a sable fish and halibut individual fishing quota (IFQ) system and is preparing plan amendments which would impose a moratorium on entry into the ground fish, crab and halibut fisheries; and

WHEREAS, There have been a number of traditional management proposals submitted to the north pacific fishery management council which would potentially eliminate those problems addressed by an IFQ system.

WHEREAS, the NPFM Council under the proposed IFQ system is moving to reduce delivery ports of sable fish and halibut, and eventually all ground fish and crab fisheries, to ten primary designated ports, thereby severely impacting small rural Alaskan coastal communities; and

WHEREAS, the ability to participate in multiple fisheries to fully diversify and adapt to changing economic and resource conditions are vital characteristics of the Alaskan fishing industry.

WHEREAS, IFQ programs under consideration provide for much of the resource to be allocated to non-resident users, excluding disproportionate numbers of Alaskan fisherman and preclude participation by the growing Alaska longline fishing fleet.

NOW, THEREFORE, THE WHITTIER CITY COUNCIL RESOLVES; THAT it urges the NPFMC to implement traditional methods of management in the sable fish, halibut and other fisheries; and

BE IT FURTHER RESOLVED; that in the event the proposed management plan is passed we respectfully request the U.S. Secretary of Commerce, Robert Masbacher to oppose the IFQ system.

PASSED AND APPROVED by the Whittier City Council this 13th day of November, 1991.

ATTEST:

Tina Lorrekovich
Tina Lorrekovich, City Clerk

Robert Masbacher
Robert Masbacher, Mayor
VICE MAYOR, WALKER

01. 10. 92

06:04PM

Benjamin's Store

PO1

Wrangell Cooperative Association

BOX 868 - WRANGELL, ALASKA 99929

To Whom it may concern:

Our Tribal I.R. A. council, The Wrangell Cooperative Association is against I. F. Q. , system as it now stands. It would price our fishermen out of the fisheries. Only good for established fisherman Making it possible for them to be millionaires overnight...

This was decided at a legally held meeting on Jan. 5, 1992 with 6 eyes and 0 naves.

Sincerely,

Wrangell Subsistence Advisory

Board Chairman,

John P. Feller Jr.

If there is need for further questions please call us at 907-874-3829

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NEWS



INCOME STATEMENT

First quarter in billions	1990	1989
Revenue	\$8,892	\$8,659
Net earnings	668	594
In dollars		
Per share	.62	.55

The Associated Press

AT&T stock price, profits take a dive

New York Daily News

NEW YORK — AT&T stock, a longtime favorite of small investors, took a beating on Wall Street Wednesday after the phone company announced its second-quarter earnings would be lower than a year ago.

AT&T's announcement was made before the market's opening bell. The stock opened down \$3.50 before rebounding to close at \$39.125 for a loss Wednesday of \$2.125. AT&T is the nation's most widely held stock, with more than 2.5 million shareholders. About 40 percent of the shares are held by individuals.

AT&T said about half the shortfall was due to lower-than-expected domestic sales of computer and telephone equipment and half was caused by high startup costs for its new Universal credit card. However, the communications giant said it still was on track for a year of record profits.

"There's been nothing quite like this before," AT&T spokesman Dick Gray said of the company's announcement.

When writing office memos, remember: less is more

Memos. According to some, the only good memo is a dead one. According to others, effective memos produce quick results. If

you're a memo writer and would like to increase your effectiveness, measure your memos against these guidelines:

• Short memos are read. Long ones are filed in piles on the

reader will delay taking action until discussing the memo with you. Despite good intentions, this may take weeks.

• Make your memos easily read by using active verbs rather than passive language. Active language says, "Let's do this." Passive language says that someone has done something to someone. Which would you rather read, "Our mid-level managers believe that..." or "There is a feeling among your managers that..."

• A quick way to shorten memos is to



"I think manufacturing is doing better and I think Europe is the reason," Hunt said.

At the same time, Hunt noted that the Index's consumer-based indicators were more mixed, with consumer expectations falling and new orders for consumer goods posting a small gain.

David Berson, chief economist with the Federal National Association, said the Index continues the pattern of "alternating increases and decreases. As long as we continue with that sort of a pattern, it indicates a pattern of continued slow growth."

MAY 89 144.2 145.1 146.2

Frederick Sturm, senior economist for Fuji Securities, noted that the May leading index level is only above its previous high set in January 1989. Over the past year, the leading index is nearly unchanged, he said.

"What it does is confirm the status quo," Sturm said, with the economy continuing to expand at a restrained pace.

Council wants limited entry for Pacific black cod fishery

By HAL BERNTON
Daily News reporter

The North Pacific Fishery Management Council is struggling to limit entry to the black cod fishery and establish a quota system that would assign each boat operator a share of the catch. The plan, if adapted by the federal government, could serve as a blueprint for a new era of Pacific cod, pollock and other bottom-fish management in the 200-mile zone off Alaska.

"The general feeling of the council is that we need to pursue a system to address many of the bad aspects of the current system," said Don

Collinsworth, the council's chairman.

The council, meeting this week in Anchorage, conducted a lengthy review of the limited-entry plan, fleshing out details with a series of amendments. Collinsworth said Wednesday afternoon he hoped to put the plan to a vote by this morning.

The new system would dole out share quotas to those fishermen already catching black cod. Share quotas would be awarded on the basis of past catches — the greater the

Please see Page D-2, CDD

money by concentrating on the teen-age market" is clear.

"Soon" is simpler than "in the near future." "Now" is stronger than "at this point in time." "Because" makes more sense than "due to the fact that."

If you've been smothering words with "ment," "ize," and "lilly" endings, see if you can find shorter words.

• If you can, illustrate your memo. Pictures, graphs and cartoons draw reader interest and convey information concisely.

COD: Pacific fishery council proposes limited entry quota system

Continued from Page D-1

catches, the greater the quota.

Fishermen would eventually be free to buy and sell share quotas that offered access to the public fishery resource. As of Wednesday afternoon, the plan contained no proposals to tax quota sales to help finance the federal costs of managing the harvest.

Collinsworth said the council needed to determine if such a tax were legal, and if so, whether it was appropriate. "We've not made a decision," he said.

The bottom fish industry is managed by the federal government, acting under the authority of the 1976 Magnuson Fishery and Conservation Management Act that gave U.S. fishermen first claim to all sea life within 200 miles of the nation's coasts. Currently, there is no limit to the number of boats that can participate in fisheries. Harvest quotas are set by the government and can be scooped up on a first-come, first-serve basis.

In recent years, the U.S. fleets off Alaska have rapidly expanded, with more than enough capacity to catch annual quotas. Seasons grow ever shorter, and management problems become more and more complex.

The council, which consists of 11 voting members appointed largely from the seafood industry, has considered limited entry for years. But the concept has always been controversial, as reflected in public testimony at this week's council meeting.

Dean Adams, a 10-year veteran of the Alaska fisheries, compared the black cod fisheries to a crowded interstate freeway. "We've reached rush-hour capacity," said Adams on Tuesday, arguing in favor of a limited entry quota system.

Shortly after Adams testified, two Kodiak-based crewmen spoke out against limited entry. "I'd have to get a loan to buy shares," said Mark Adam. "And I bet the first person who will offer me a loan will be a conner. And then I'll be in

monopoly happening."

Other fishermen say that the fleets will soon shrink due to bankruptcies and that it's too late for the council to step in and try to protect the industry. "Let the weak fail and the strong survive. The prime goal of the Magnuson Act is protection of the species," said Dave Ilaville, a Kodiak trawl boat operator. "As long as that is accomplished, to hell with the fleet."

But fishermen are no lon-

ger the only ones asking for a voice in management of the harvest.

Major U.S. fish buyers are becoming increasingly concerned about management policies and shortened seasons that make it much more difficult to assure a continuous supply of fish, said Ron Cegner, senior vice president of Jerico, which operates a chain of 1,500 Long John Silver seafood restaurants.

Cegner said his company buys 8 million pounds of

Alaska cod annually and 9 million pounds of pollock. The company would buy a lot more if it could be convinced of a steady supply. "No one seems to be concerned about our needs," Cegner said.

Cegner is concerned about shortened seasons that result in cod frozen for longer and longer periods, reducing its quality.

He is also concerned about an upcoming closure of the Bering Sea bot-


tom-trawl cod fishery due to a high accidental catch of halibut, a species that cod fishermen are prohibited from retaining.

Federal officials expect the closure to take effect by the end of the month or shortly thereafter. That would prevent fishermen from taking more than 80,000 metric tons of cod left in the annual harvest quota.

Cegner said there is a worldwide shortage of cod, and Long John Silver hoped

to have a year-round supply from Alaska.

But any move to exit the cod season will be fought by hook-and-line fishermen who have traditionally claimed the halibut. They are backed by the International Pacific Halibut Commission, a halibut regulatory group. That commission wants the cod fishery's down as soon as it is to 5,333 metric tons of halibut the seasonal quota set by federal government.



JULY

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Intro to Mac	Sat July 7	9:00-12:00	\$75
	Tues July 17	9:00-12:00	\$75
Intermediate Mac	Sat July 7	1:00-4:00	\$95
	Tues July 17	1:00-4:00	\$95
Intro to Word 4.0	Tues July 19	9:00-4:00	\$185
	Wed July 23	9:00-4:00	\$185
Advanced Word 4.0	Thurs July 26	9:00-4:00	\$185

ComputerLand Learning Center
4240 Old Seward Hwy
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Intro to Excel	Sat July 14	9:00-4:00	\$185
	Tues July 31	9:00-4:00	\$185
Intro to PageMaker	Thurs July 19	9:00-4:00	\$185
	Sat July 26	9:00-4:00	\$185
Intro to Works Part 1	Wed Processing & Basic Database	Wed July 11	9:00-12:00 \$95
Intro to Works Part 2	Spreadsheet, Database Mgmt. & Graphics	Wed July 11	1:00-4:00 \$95
Intro to FileMaker	Tues July 24	9:00-4:00	\$185





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Associated Press
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Delay of fish quotas sought Hickel wants study finished before proposal goes to D.C.

Daily News staff and wire reports

Gov. Wally Hickel on Monday asked the North Pacific Fishery Management Council to put off asking the U.S. Department of Commerce to approve a controversial plan for giving fishermen halibut and black cod fishing quotas.

He asked the council to wait until April, after a federal study on how the plan could affect coastal communities is done.

Clem Tillion, the governor's top fishery aide and a council member, has been one of the strongest supporters of the new

quota system. But he said Monday he would push the governor's request.

"You know I'm a soldier. And there are times when the general tells you to do something, and you do it," Tillion said.

The National Marine Fisheries Service is studying the effects of giving each boat in the two fisheries a quota of fish to catch. The council has proposed the quota system to put an end to the pell-mell, free-for-all fisheries that have been jammed with ever-increasing numbers of boats. The result has been ever-

shorter seasons that offer fresh fish for only a brief few weeks and prompt fishermen to work through even the worst winter storms.

The study is due in March.

Some fishing groups and city and community councils in southern and Western Alaska have fought the proposed system of permits — known as ITQs, or Individual Transferable Quotas. Some view the quota system as a giveaway of a public resource that will enrich a few fishermen and disenfranchise many Alaskans who might

one day seek to join the harvests.

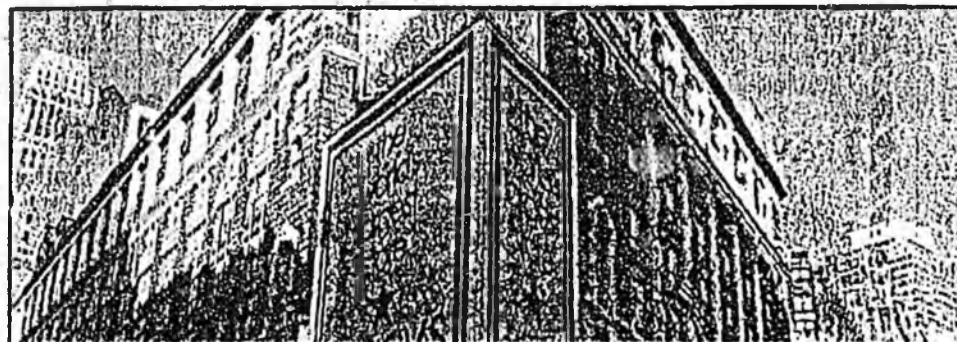
Paul Fuhs, the governor's legislative liaison, recently visited coastal communities to discuss those concerns, Tillion said.

The fisheries council is meeting this week in Portland, Ore. It approved the quota plan last month, but some opponents said they would ask council members to reconsider.

"Many of our coastal community residents have expressed

Please see Page F-5, PLAN

STORM CLOUDS THICKEN



Guilt in the USA

Buy American
ads get tough

By JOANN MULLER
and JANET BRAUNSTEIN
Knight-Ridder Newspapers

Kodiak Daily Mirror

-C3--3-FEB 15 92
Senator Fred Zharoff
Box V
Juneau, AK 99811

VOL. 52 NO. 010

WEDNESDAY, JANUARY 15, 1992

KODIAK, ALASKA

20 P

Kozak calls governor's request for a delay of IFQ plan 'smoke and mirrors'

By SUZANNE HANCOCK
Staff Writer

Some local fishing industry representatives think the governor's actions are too little, too late regarding Individual Fishing Quotas.

"It's an insult to our intelligence," said Linda Kozak, Kodiak Longline Vessel Owner's Association executive director.

Kozak said when discussing the issue last week with legislative liaison Paul Fuhs, the lan-

guage included rescinding the December action of the North Pacific Fishery Management Council.

Kozak said the read of industry people at the ongoing Portland meeting of the NPFMC is that the governor's request for delay in sending the fishing quota proposal to the Commerce Secretary is "smoke and mirrors."

Governor Walter J. Hickel requested a delay in sending the council's action on IFQs to the

Secretary until April.

The delay would be so that the results of a study on the probable impacts on Alaskan fishermen and communities could be analyzed.

The study is being done by the National Marine Fisheries Service, and will be finished by April.

Jeff Stephan, manager of United Fishermen's Marketing Association, Inc., wrote to Richard Lauber, NPFMC chairman, asking to council take action to withhold the submission of the sablefish and halibut fixed gear IFQ management plan for either National Environmental Policy Act review of Secretarial Review until after the April meeting.

"We hope the council can treat this issue properly at this meeting and correct the aberration of the public process," Stephan said.

UFMA also requests the council take action at this meeting to direct the development and preparation of a Social Impact Analysis, a Cost-Benefit Analysis and an Economic Impact Analysis prior to the April meet-

ing.

"We request that the Council take action at the April, 1992, Council meeting to reconsider their December, 1991, action regarding the Sablefish and Halibut Fixed Gear IFQ Management Plan," Stephan said.

"And that they either reaffirm or rescind such action based on the review and consideration by the public and the Council of in-depth analyses of Social Impact, Cost-Benefit and Economic Impact."

Stephan said his organization does not believe that the plan package can be considered "complete" for submission for either NEPA or Secretarial Review until the above-suggested analyses are completed, reviewed by the public and council, and considered by the council.

The letter had more suggestions for the council and concluded by saying the council did not properly weigh and consider an analysis of a combined sablefish and halibut fixed gear IFQ management plan prior to its December action regarding the plan.

Fishermen turn down \$1.95 for Tanners

The United Fishermen's Marketing Association voted Tuesday to not accept a Tanner crab price offer of \$1.95 per pound.

UFMA is asking \$2.25 per pound for Tanner crab that are delivered during the 1992 Tanner crab season.


The Association met again today at Fishermen's Hall at 11 a.m. UFMA may have voted on any other price offer delivered to the UFMA office before or during the meeting.

Since a price settlement has not been achieved at this time, fishermen have voluntarily agreed to remain in port. They have agreed to leave all Tanner crab pots unbaited and in the legal storage areas only. Fishermen have agreed not to place any baited gear on the grounds until 24 hours after a price settlement is reached.

OPTI

Anchorage Daily News

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Lawrence Fanning, Editor and Publisher 1967 to 1971
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Fish politics

Conflict of interest the rule of the game

The North Pacific Fishery Management Council's latest meeting was a good example of how the council is riddled with conflicts of interest.

The council endorsed a controversial limited-entry plan for two fisheries — a move that directly affected several members' pocketbooks. Three members represent interests that stood to get a share of the pie under the limited-entry plans. The board chairman is the lobbyist for a group that opposed the move — and he voted his client's position.

On issue after issue, conflicts of interest turn up at the council. The following examples were reported earlier this year by the Seattle Times:

• Tight pollock catch limits set by the council cost the firm of one Seattle-based member, Walter Pereyra, a shot at millions of dollars in revenue. Pereyra is trying to get the limits raised.

• Member Larry Cotter was working for interests in the crab industry around the time he reversed his stand on an issue to support crab fishermen's position.

• Member Oscar Dyson, part-owner of an on-shore plant in Alaska, voted his own self-interest on one of council's most controversial moves. He supported the decision to allocate a fixed share of the catch to on-shore plants. Chairman Rick Lauber, a paid representative of shore-based plants, has a similar conflict on the same issue.

Federal conflict-of-interest rules do not apply to the council. Supposedly this is because the council only "advises" the U.S. Secretary of Commerce, who makes the final decision. In practice, the secretary almost always rubber-stamps the council "recommendation."

Only four of the council's 11 members represent public agencies. The other seven are free to mix their personal business with council business.

As Mr. Pereyra, the Seattle fishing boat owner, told the Seattle Times:

"I shouldn't even BE on the council making these kinds of decisions that I have a conflict on — absolutely I think that's true of every member of the council. It should be in the hands of the professional managers."

As with all other council issues, the conflict-of-interest question has a political undertow. Mr. Pereyra and other Lower 48 interests haven't done very well under the current council setup. Eliminating conflicts of interest at the Alaska-dominated council might boost the odds they'll win more often.

But regardless of who wins and loses under the current setup, the council structure is ethically bankrupt. We don't let Exxon, Arco and BP run the state Department of Environmental Conservation. We don't put people from phone and electric companies in charge of the state public utilities commission. We shouldn't turn federal fisheries over to fishermen whose decisions directly affect their personal fortunes.

These days

MOSCOW — Traveling by train from the Lithuanian city of Kaunas to Moscow recently, my companions — all Lithuanians — insisted on giving me their phone numbers: "Call us, we'll bring you some food next time we go to Moscow. Poor Moscovites..."

It wasn't always that way. Two years ago we Moscovites were proud residents of the motherland's capital, indignant over the crowds of shoppers from the provinces. Today, those "provinces" have just chosen the Byelorussian city of Minsk as the administrative center of their new commonwealth. Moscow has a bad name.

As an editor of a prestigious weekly I earn 1,000 rubles a month — considerably higher than the minimum wage of 342 rubles but far less than the 3,000 rubles a family of three like mine needs to lead a civilized life. My wife — a researcher in an academic institute — earns 300 rubles, close to \$ a month by the official exchange rate. With no money left in the state budget we're not counting on her salary next year.

'We feel like

I usually don't pay much attention to anonymous letters, but I got one the other day that was a cry from the heart. It came with a Des Moines, Iowa, postmark, unsigned and written on lined yellow paper in a crude hand, with spelling mistakes. I cleaned up the spelling and punctuation a little, for clarity's sake. The rest is as it received me.

Dear Mr. Kaas:
What we the people need is good paying jobs. Then the company will take care of itself. We'll pay the taxes, but the gov. pay the interest. How many TVs are made in the USA? How about VCR? Is there one U.S. car made

1/16/92

BUSINESS

ANCHORAGE DAILY NEWS

SECTION D

ICE



Associated Press reports key point, or nt. Yield

and Credit

Fisheries troubled, U.S. says

NOAA paints grim picture, but Alaska's marine stocks healthiest

By DAVID WHITNEY
Daily News reporter

WASHINGTON — A report on marine life in the nation's coastal waters paints a grim picture of diminishing stocks of fish and marine mammals and of huge wastes by the commercial fishing industry.

The report by the National Oceanic and Atmospheric Administration said 65 species of the most commercially marketable fish and seafoods are being harvested in such volumes they may not be able to sustain their populations.

Among those considered "ov-

erutilized" are Pacific Coast salmon, North Pacific albacore tuna, Pacific razor clams and bay scallops, Pacific striped bass, Atlantic salmon and cod, Northeast lobsters and scallops, North Atlantic swordfish and various Atlantic and Gulf of Mexico shrimp.

The report also said thousands of tons of edible fish are wasted annually, because fishermen throw them away to fill their nets with more valuable seafood or because federal policies discourage fishermen from accidentally catching them while targeting others.

The federal fisheries off the Alaska coast by far are the best managed and healthiest, the report said.

NOAA called the document a "report card" on how well the nation is handling the fisheries.

But the agency also views it as a call to action.

Under a 1976 law, the federal government is supposed to regulate the \$4.4 billion annual commercial fishery so as to conserve stocks for long-term, sustainable harvests.

NOAA spokesman Reed Bontwright said that too often actual management decisions have

been left to regional advisory councils typically made up of those in the fishing business. The result has been overfishing, he said.

In a preface to the report, NOAA's assistant administrator for fisheries, William W. Fox Jr., said he is determined to change course.

He called for major initiatives that include reducing overfishing and stepping in to maintain still-healthy stocks.

The only area where no stocks were in danger of being over-

FOR JOBLESS, IT'S A COLD WORLD

Book

Please see Page C-4, FISHERIES



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FRIDAY, JANUARY 17, 1992

KODIAK, ALASKA

Increases in halibut quota considered for '92 season

By MARK BUCKLEY
Staff Writer

1992 Halibut season proposals are out and the International Pacific Halibut Commission (IPHC) staff will propose an increase in the area 3A catch limit.

"The Commission will have its annual meeting on the 27th of January," said IPHC senior biologist, Bob Trumble. "That's when we propose any regulatory changes necessary. We also project the quota and lay out for discussion purposes a set of options for the seasons."

"The staff does not feel strongly about which of these options is best, as long as they meet general conservation requirements."

"We present the options to a Fishermen's Conference Board and they come to a consensus on how the season should go. The Board then advises the Commission," Trumble said.

The regulatory proposals summary for 1992 reports that halibut stocks continued to decline in 1991 and are well below the peak in the mid-1980s. However, proposed catch limits for 1992 are higher than for 1991 because of "new information on stock biomass and bycatch mortality," according to draft IPHC regulatory proposals.

The total 1992 catch limit for areas 2A through 4E is 63.65 million pounds. Last year the limit was 55.35 million pounds. The higher number this year represents an increase of 15 percent over 1991.

Proposals for areas 3A and 3B, the waters most Kodiak-based fishermen target, call for a slight overall increase.

The proposed area 3A catch limit will rise from 26.6 to 29.9 million pounds, an increase of 12 percent. The 3B catch limit is

proposed to drop from 8.8 million pounds to 5.9 million pounds, a decrease of 33 percent for the area.

The total for 3A and 3B could rise from a limit of 35.4 million pounds in 1991 to a proposed 35.8 million pounds in 1992.

Although the IPHC staff does not consider dates of fishing periods to be of sufficient biological concern, fishermen look at timing carefully.

This year, the staff forecasts the entire 3A and 3B catch may be taken in two 24-hour periods. Therefore, the IPHC staff proposes, only one fishing period should be scheduled for May or June to allow fishing later in the year.

The three dates proposed for the first opener are May 11, May 25 or June 8. Staff proposes a second opener for Sept. 7. If a mop-up opener is allowed, that's proposed for October 5.

cision until the April meeting of the North Pacific Fishery Management Council (NPFMC).

"He's not asking the council to change their action at this point, he's just asking them wait," said Hickel's Deputy Press Secretary John Manley this morning.

Today Hickel sent a letter to Rick Lauber, chairman of the NPFMC. Lauber is attending a council meeting in Portland, Oregon.

Earlier this week, Hickel has been accused of dealing in "smoke and mirrors" by Kodiak fishing industry representative Linda Kozak. Kozak was dissatisfied with the wording of the governor's previous request to the council that asked them to delay sending the IFQ resolution to the Secretary of Commerce for her final approval.

Kozak and other industry representatives were urging the governor to ask the council to rescind its decision until after it had time to analyze a socioeconomic study on the impact of the IFQ plan. This study will be available to the council before its

FORUM

New quotas will ruin Alaska's fishing industry

By RONALD J. KUCZEK

Dec. 8, 1991, will be remembered as another day of infamy, at least in Alaska. This is the day the iron hand of federalism choked the life from most Alaska fishermen.

The perpetrator was the North Pacific Fisheries Management Council, which struck Alaska at 6:04 p.m. on this Sunday evening. The full damage done is not clear yet, but by all indications, it will be considerable.

Why? Because Alaska fishermen believe the council's action will radically change the management method for fishing halibut and black cod (sablefish) in adjacent Alaska waters.

This council was authorized by the Magnuson Fishery Conservation and Management Acts. It's one of eight councils established in sections across the country to manage fishing in exclusive economic zone waters. These councils are unique in that they are exempt from any conflict of interest laws. So the members may vote what is good for them rather than what is best for the public interest.

centered in the Ballard sec-

On Dec. 8 the council passed a plan that effectively makes the halibut and sablefish fisheries private by putting them into a program called the Individual Fisherman's Quota (IFQ) plan.

The council says this plan has virtue because it will bring order to these fisheries. The National Marine Fisheries Service likes it because it will be easier to enforce.

The question that must be asked, however, is if the plan is so good then why is there total outrage expressed over it from Alaska fishermen ranging from Sitka to Unalaska? Why have 19 coastal communities and organizations, including the Alaska Municipal League and the State Chamber of Commerce passed resolutions asking this council to comprehensively study the social-economic impact and know what the impact will be on these communities before implementing such a plan? Why have all Alaska fish processors condemned this plan?



This plan is designed to bring order to these fisheries by decreasing the number of participants through the issue of IFQ shares. The environmental impact statement that accompanies the plan shows that eventually the fishing fleet for halibut will be reduced from 4,000-plus vessels to as few as 288 to 376 vessels. This is a 93 percent decrease.

What the plan does not say, however, is that many Alaska fishermen will be eliminated by the IFQ plan by design, and this action will have a tremendous impact on these fishermen who own the vast majority of the small vessels in this fleet.

At the other end of the scale, the plan shows that the top 4.7 percent of vessel owners qualified will receive the greater amount of the IFQ quota shares. And although the EIS does not state it directly, but strongly indicates it, the vast majority of these vessel owners are

tor of Seattle.

Finally, the plan, in its infinite wisdom, makes these people instant millionaires or multimillionaires by virtue of making these quota shares have value that can be sold. Any entity can own these shares including corporations or partnerships, as long as these groups meet the qualifications.

To bring order to these fisheries the plan generates the intentional breakup of the family-based, small-boat, Alaska fishing industry at a significant loss of Alaska jobs, and intentionally creates dynasties centered outside Alaska, who will become power brokers and control halibut and sablefish fisheries forever more.

No wonder Alaskans are angry. Alaska fishermen are being ejected from our fisheries. The only people who apparently do not understand, or who are unwilling to understand the impact of this plan, are the council members.

The EIS, a product of the council staff, is supposed to address the social-economic impact. In Section 5.2.3, however, the survey infor-

mation used in this study was insufficient to assess the economic importance of the halibut fishery to Alaska communities.

This documentation does indicate that coastal communities in Alaska will be impacted. But, any specifics are unknown at this time, while Seattle may well benefit from this allocation scheme.

One would think that before introducing such a radical change in the management method for these fisheries, the social-economic impact would have been studied comprehensively. This is not the case. It is for this reason the many communities went to their legislative bodies to pass resolutions insisting on determining the impact before such a program is put into place.

Finally, Alaska fish processors are opposed to the IFQ plan because they know that once this plan has been fully implemented, most halibut and sablefish caught in Alaska waters will go directly to Seattle and points south or west for processing.

Incredibly, in the face of almost total opposition in Alaska, the council passed this plan and is intending to move forward to its implementation as soon as possible. At this point, the fate of the halibut and sablefish fisheries for Alaskans rests with the governor.

The council will meet on Jan. 15 in Portland. Alaska's best chance to reverse this vote is for the governor to step forward and accept his responsibility for Alaska and its second strongest contributor to the Alaska economy. He must direct the Alaska delegation to rescind its vote and to initiate a comprehensive study to determine the impact this plan will have on Alaska and its citizens.

The key is the governor. If he fails to act now, history will show that it was he, and he alone, who was responsible for re-installing fish traps back in Alaska. They are called IFQs.

□ Ronald J. Kuczek has been a commercial halibut and salmon fisherman since 1978.

Homophobia should be OK

In reference to an editorial on Dec. 21, "Gay Rights: Time to talk about prejudice"



mund Burke has said that "bad laws are the worst sort of tyranny." And Wendell Phillips, American orator and abolitionist, cautioned that "the best use of good laws is in

Doelger said the film's research-putting in punches against some-ers came to the conclusion that the one else on camera, then going into

at it will be contentious,

OPINION

Anchorage Daily News

Gerald E. Grilly
Publisher

HOWARD WEAVER
EDITOR

WINNER PULITZER PRIZE 1980
FOR BEST GENERAL INVESTIGATIVE REPORT
FOR THE ALASKA STATE DEPARTMENT OF PUBLIC SERVICE

Michael Carey, Editorial Page Editor
Patrick Dougherty, Managing Editor



Go slow. . .

And then stop limited-entry plan

Last week brought renewed hope that a misguided program in Alaska's federal fisheries may be stopped. The North Pacific Fishery Management Council agreed to take more public testimony in April on its proposed limited-entry plan.

The plan is a rank giveaway of public resources. A select class of fishermen would get a perpetually guaranteed share of the catch in two key fisheries — shares they're free to sell or lease — all without having to pay a cent for taking private ownership of a public resource.

Earlier in the month, Gov. Hickel surprised friends and foes of the plan alike. He asked the fish council to delay the plan until a federal study of its economic impact comes out in March. He left some people wondering whether he'd changed his mind about the scheme, which his fish czar, Clem Tillion, strongly supported. Mr. Tillion suggested that waiting for the study to come out will help quiet some of the plan's vocal opponents.

Whatever the study may show, this limited-entry scheme is fundamentally bad policy. It's true that too many boats are chasing too few fish, causing ever shorter and dangerously frenzied fishing seasons. It's true that today's come-one, come-all system makes it harder for all participants to make a decent profit.

But if limited entry is the answer, it can be done in ways that are more fair to the people who own the resource in question, American taxpayers. Limited entry does not require the federal government to give the fish to a small class of fishermen forever at no

ing as moderator, hit him icians put out."

Peace turns weapon

THE RIGOLETS, La. — As old forts go, this is a handsome one, wearing its mossy green moat like a dull necklace.

Fort Pike protects the Rigolets, a slim passage between the Gulf of Mexico and Lake Pontchartrain that leads to New Orleans.

I should affix a sticker to the bumper of my punished Ford: I Brake for Old Forts. Any and all. It is the classic irony that fascinates me; there are few places as peaceful as old military sites. This one is a sleepy bulwark by the blue.

It's a good thing Fort Pike has beauty to commend it; like many defenses, it became obsolete almost before it was finished.

Not a single cannon was fired in battle from the red brick base of Fort Pike. Which means this was a pretty peaceful spot even during "active" duty.

For many of those active years the fort reigned over the wet landscape as it does now — with a single person in charge, someone perfunctory to rattle about and count the cannon.

employee sits snug in office while a companion prowls the grounds: gray and white feline a collar as proof it knows and then curling an arched casement in of contentment.

The state provides formation pamphlet says Fort Pike dates to but Fort Petite Coqui small wooden fort, was before that. During that of 1812 Andrew Jackson messaged its commander: "Defend your fort to the extreme, and in case should not be able to out, spike your guns, up the fort and evacuate

Easy for him to say That was typical military overkill and proved unnecessary, but the British to New Orleans and bustling cities convinced United States it needed at pivotal points along shore.

That's when the most substantial Fort Pike was along with many other the same genre, today bling testaments wall-manning