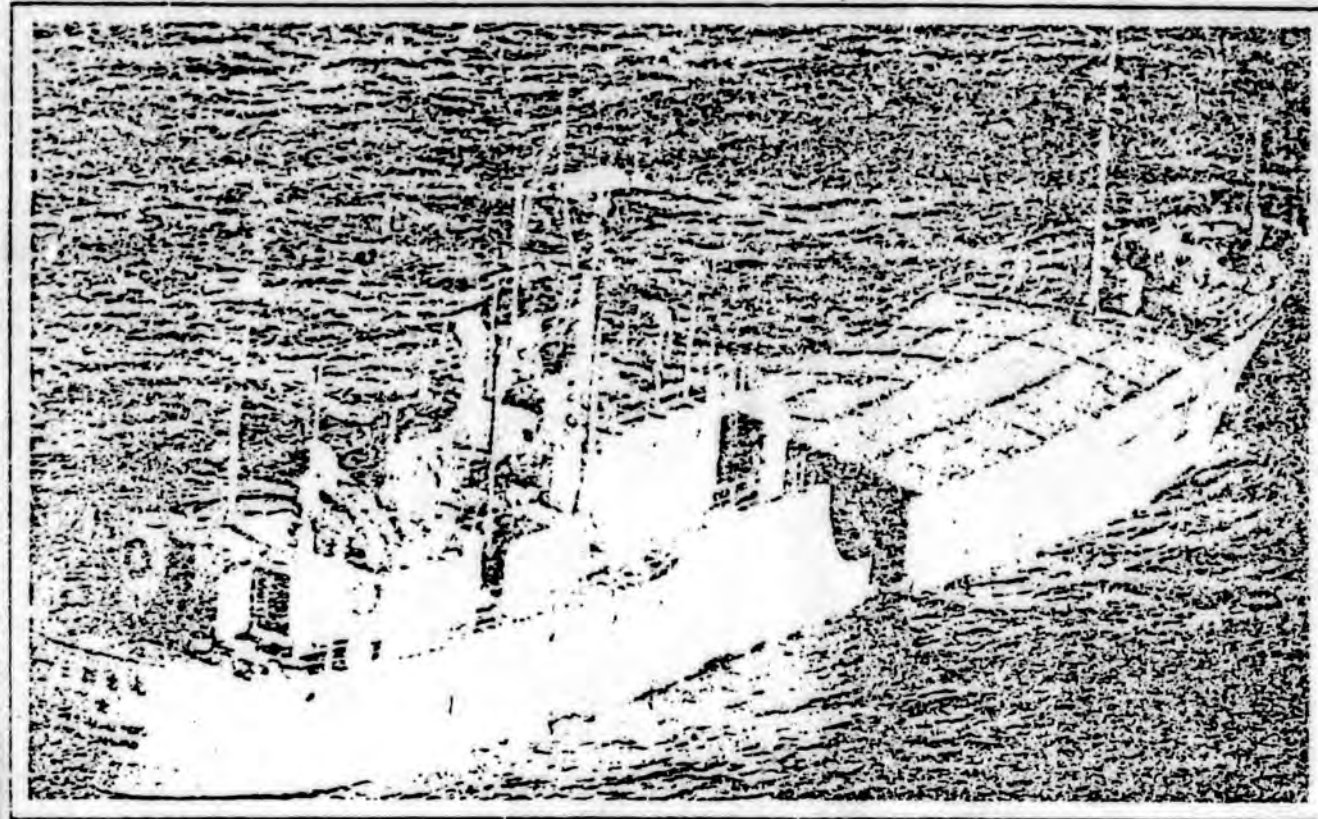


ALASKA LEGISLATURE SPECIAL COMMITTEE / SUBJECT FILE 8672

1199 SCOMM 26: HOUSE SPEC. COMMITTEE ON FISHERIES 1983-84

FIGURE B2. A common modification of a standard Japanese longliner fishing for blackcod is the addition of a temporary shelter deck over the main working deck, as shown in the photograph. Butchering occurs out of sight under the shelter deck rendering any air surveillance or procedures useless.

Kindly Marine Fisheries Service



involving even millions of pounds. The ineffective surveillance of the Japanese blackcod fishery in the 1960s was markedly altered in the 1970s and undoubtedly reduced the impact of such fishing on the halibut stocks.

South of Cape Spencer

The annual losses of halibut from all grounds south of Cape Spencer due to domestic and foreign trawling were probably at the very least 8 to 11 million pounds annually and conceivably even much greater in some years. In addition to losses due to trawling, there were those that stem from the fleet of large Japanese setliners fishing primarily for blackcod south of Cape Spencer, particularly off Southeastern Alaska. Their catch of halibut could have amounted to 2 to 3 million pounds annually, as estimated from occurrence of Japanese hooks in halibut taken by the Canadian and United States setline fleets. Eastern Bering Sea fishing by the Japanese and Russians has also greatly reduced the migration of halibut to the stocks in the Gulf of Alaska and as far south as the grounds of British Columbia.

The above unrecorded losses from all sources both

foreign and domestic with a probable minimum magnitude of 11 to 14 million pounds annually during the 1960s from grounds south of Cape Spencer required a drastic reduction in the catches permitted the Canadian and United States setline fleet. The Halibut Commission during the 1960s reduced the permitted level of removals from a test level of about 31 million pounds at the beginning of the decade to 20 million by 1970. Despite this 30% reduction, there was no significant response in the condition of the stocks. Such lack of response is entirely contrary to what was shown by the catch and stock reactions of the previous 50 years. There could be no better indication that large quantities of halibut were being removed from the grounds south of Cape Spencer by other than those permitted the Canadian and United States setline fleets.

In the 1960s it would have been naive to have reduced the North American setline catches at any greater rate or in larger amounts in face of the removals by the foreign fleets, unless of course, it was to benefit the latter. With the decline in the foreign depredations in the 1970s, and provided they are further reduced, some benefits may ultimately accrue

1978 An. Rep.

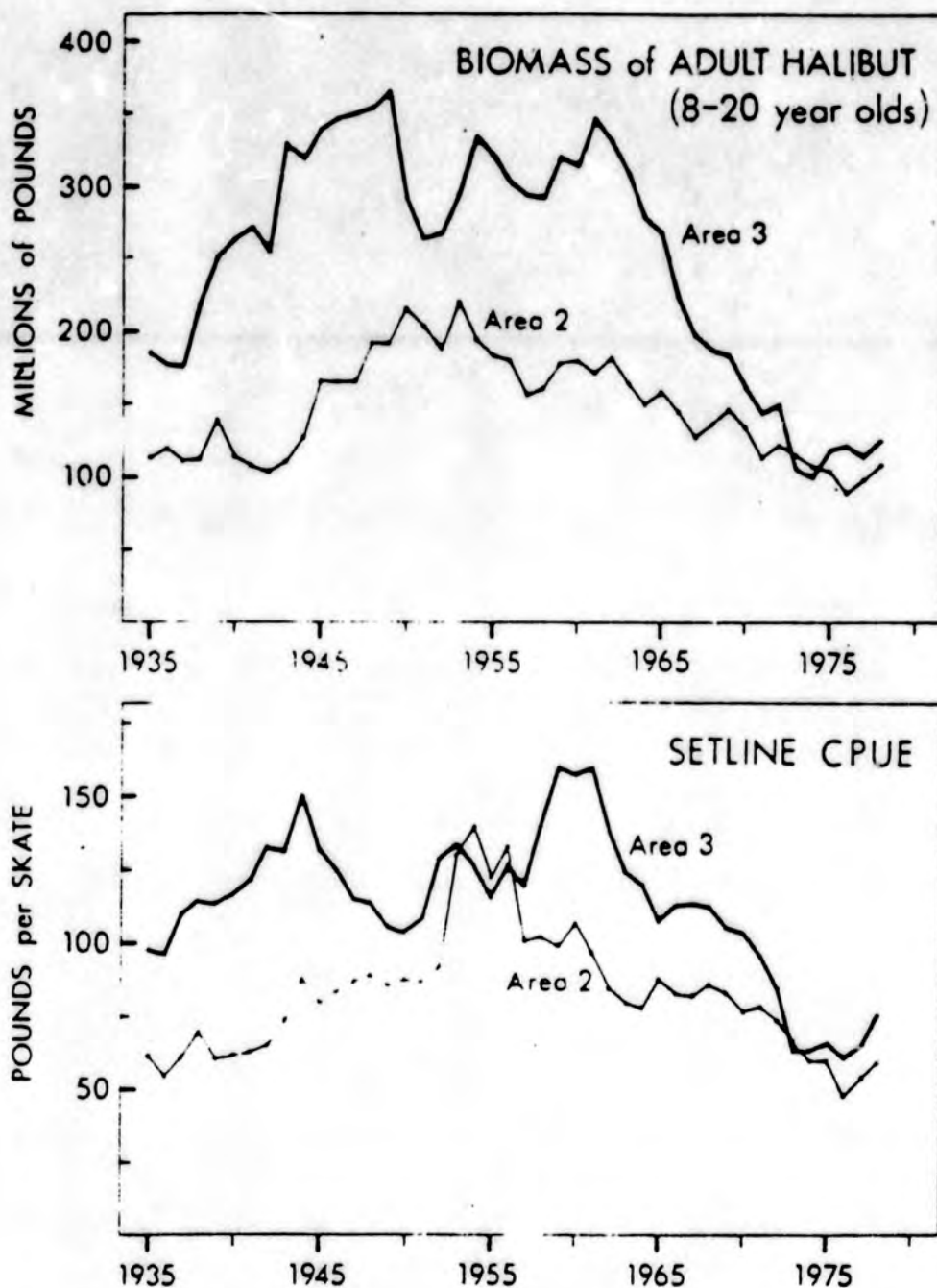


Figure 2. Biomass of adult halibut and setline CPUE in Areas 2 and 3, 1935-1978.

Although not fully understood, several factors have contributed to the scarcity. The production of young has declined, perhaps as a result of adverse environmental conditions or inadequate spawning stocks, and incidental catches have reduced survival. Recent studies indicate that the spawning potential has been sharply reduced, but whether this reduction is responsible for the low abundance of young is unclear.

Bering Sea
is spawning area!

It should be protected
not opened
wide to new fishing ventures

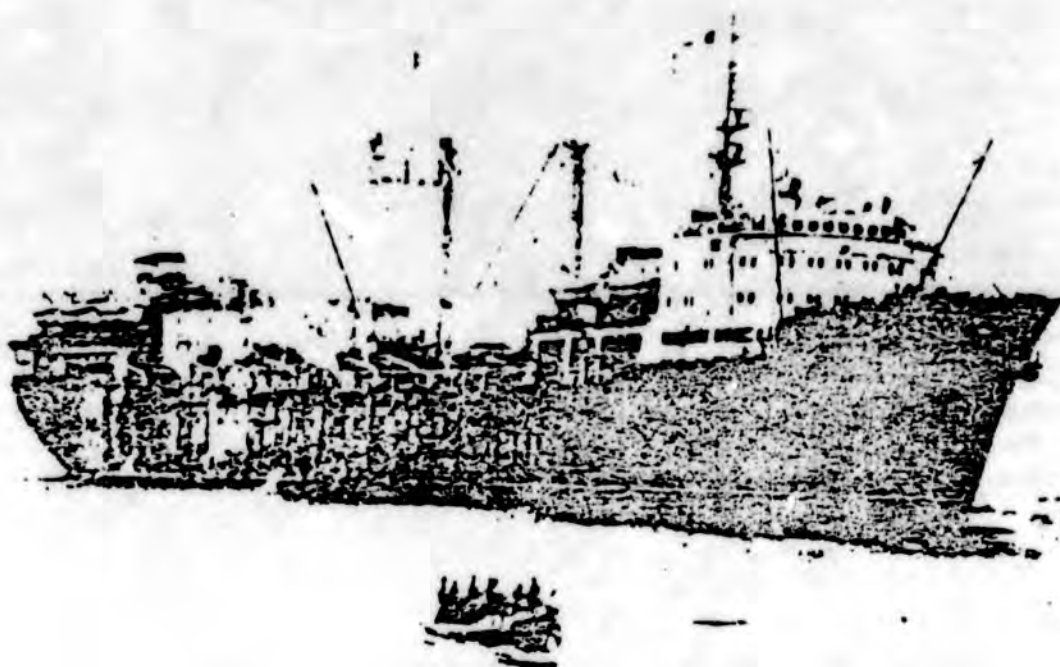


FIGURE 8.2 The Konstantin Sukhanov, a Soviet factory ship. This 552-foot vessel, and several others of similar size, operate off Alaska in the herring, shrimp, and king crab fisheries. They have complete canning, freezing, and fish meal factories aboard and have complements of about 640 men and women. Twenty or more large trawlers and varying numbers of smaller boats supply the factory ship.

Bureau of Commercial Fisheries, Alaska

Soviet economists concluded that the sea is more efficient by a significant margin. S. C. Mikhailev, a Russian economist, calculated that to produce 100,000 tons of beef and pork on Soviet farms required a capital investment of from 2 to 2.5 million rubles; to produce the same tonnage of fish required an investment of only 1.5 to 1.7 million rubles. After the capital costs were paid the production cost for the meat would be 600 million rubles; for the fish, 200 million. The advantage on the side of fishing was even more striking in terms of expenditure of labor: it required 5.4 million man-hours to produce the meat, compared with 1.35 million man-hours to produce the fish equivalent. With this kind of information before them, the Soviet planners were easily convinced that Russia could satisfy its vast and rapidly increasing needs for animal protein better from the sea than from the land.

Having arrived at this conclusion, the government proceeded to make a detailed plan for an all-out assault on the sea. It became national

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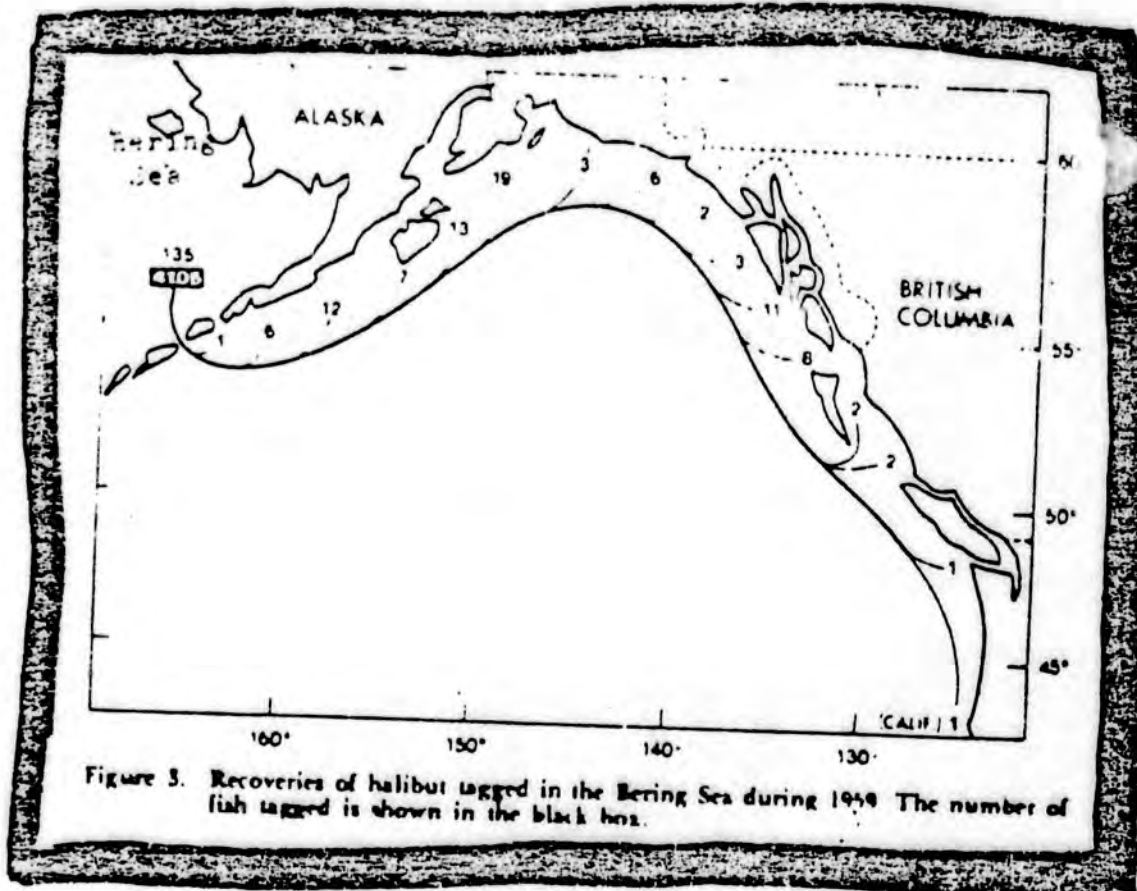
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The geographical range of the migrants from the Bering Sea reached a maximum in the first year after release, but the numbers emigrating reached a maximum usually in the third and occasionally in the fourth year after tagging. The consistency of such timing and the distribution of the recoveries from experiment to experiment in the Bering Sea indicates that the Bering Sea stocks are a part of the 3,000 mile stock continuum that extends north from California. As to counter movement of adults into the Bering Sea from the Gulf of Alaska, There is no authentic evidence of a single such instance. Tens of thousands of halibut have been tagged in the gulf at a time when there was an active setline fishery in the Bering Sea that would have assured some recoveries.

Obviously the halibut in eastern Bering Sea are an integral part of the eastern Pacific population, a fact that was not only disregarded but was seriously questioned by some when the halibut of the eastern Bering Sea were removed in 1962 from abstention by Japan by the Tripartite Fisheries Commission.

The Pacific Halibut; P. Howard Bell; 1981



About 25% of the recoveries of halibut tagged in the Bering Sea were recovered in the Gulf of Alaska, British Columbia, and some as far south as California.

4(A)

back cover). Most of the tagging experiments have been conducted in the summer and most of the recoveries are made during the summer when fishing is permitted. Although extensive summer to summer movements have been recorded, most of the recoveries are made within 60 miles of the release area. Data from experiments in which halibut were tagged or recovered in the winter are limited, but the results show that movements are more extensive than in summer and that the predominant direction of movement may differ substantially between the two seasons.

The distance and direction of the migrations also may differ with the size and age of the fish. Emigration has been observed from all regions, but no recoveries of adult halibut released in the Gulf of Alaska have been made in the Bering Sea. An example of the distribution of tag recoveries from a Bering Sea experiment in 1959 is shown in Figure 3. Halibut occasionally migrate great distances and six tags have been recovered over 2,000 miles from their point of release. These fish were tagged in the Bering Sea or near the Aleutian Islands and recovered at points from Cape Flattery, Washington to Cape Mendocino, California. One of the fish was recovered 2 years after being released; the others were recovered in 5 or 6 years. The longest migration was from Atka Island in the Aleutian Islands to Coos Bay, Oregon, a distance of 2,500 miles. Another halibut released southeast of Cape Navarin, U.S.S.R. during a joint Soviet-IPHC experiment in 1975 was recovered in 1977 near the Shumagin Islands in Alaska, a distance of 1,000 miles.

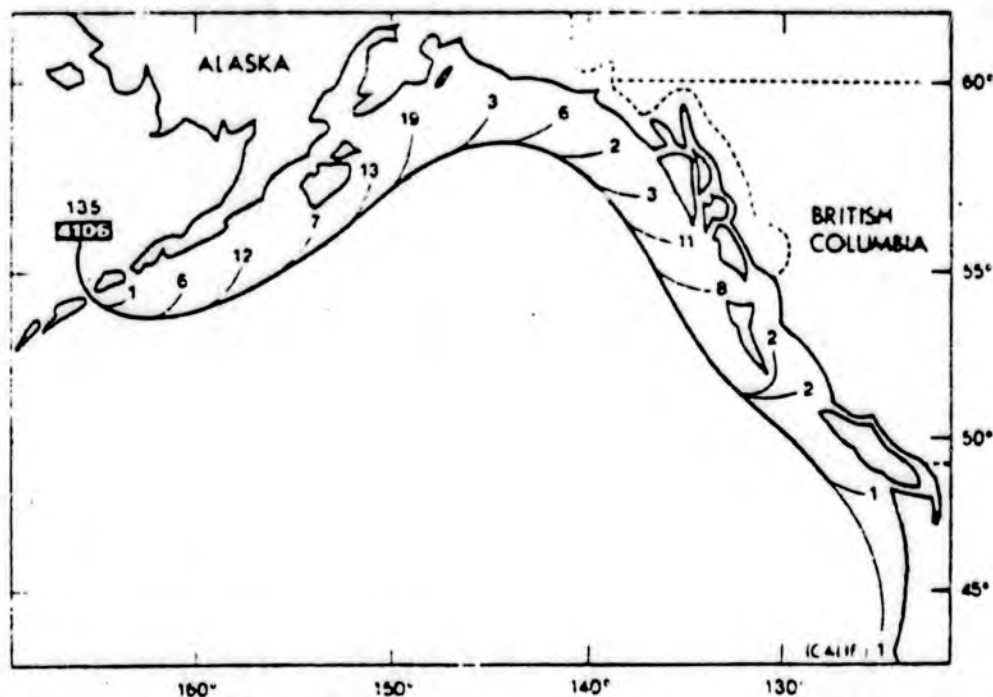


Figure 3. Recoveries of halibut tagged in the Bering Sea during 1959. The number of fish tagged is shown in the black box.

Juvenile halibut, those under 7 years old, also migrate long distances, apparently counterbalancing the northwesterly drift of the eggs and larvae as described in the next section. These juvenile and adult movements result in net migrations of an easterly and southerly direction in the Gulf of Alaska.

7.
4(B-1)

Coast fisherman and several had gone to Norway to purchase them. In that year the commission, anticipating the introduction of such gear to the fishery, prohibited its use and has continued the prohibition to date. The basis for the action came from indications of very high selectivity of the gear for large spawning-sized fish (Devold, 1938).

TRAWLNET CAPTURE OF HALIBUT

Prior to 1944 there was no restriction upon the taking of halibut by trawl-net gear. However, since the late 1930s the quantity of trawl-caught halibut landed increased from 80,000 pounds in 1941 to 528,000 pounds in 1943 in Oregon and Washington alone. In addition, another 100,000 pounds was recorded for California and British Columbia.

In 1944 the Halibut Commission prohibited the retention of halibut taken by bottom trawlnet gear both on an incidental basis and as a target species. While this action forestalled the development of a domestic trawl fishery with halibut as a primary

target species, the inadvertent taking of halibut by an expanding domestic trawl fishery posed many problems amongst which were losses that accrue to the stocks of halibut through wastage. Also, the enormous expansion of foreign fishing in the late 1950s, chiefly trawling in the eastern Pacific Ocean including Bering Sea, would have had a disastrous impact upon the stocks of halibut, both of adults and juveniles.

What the future holds for the effects of trawling upon the Pacific halibut stocks under the new 200-mile limits in Canada and United States contains many imponderables. A great deal will depend on how each of the two countries exercises its new authority and manages its multispecies demersal fisheries. Will Canada and United States accede to the longstanding demands of their trawl fleets to retain the incidentally caught halibut—a position having considerable support in the research and administrative departments of the respective countries?

Magnitudes of Halibut Catches by Trawler by Sections of the Pacific Coast

While the Halibut Commission may prohibit Cana-

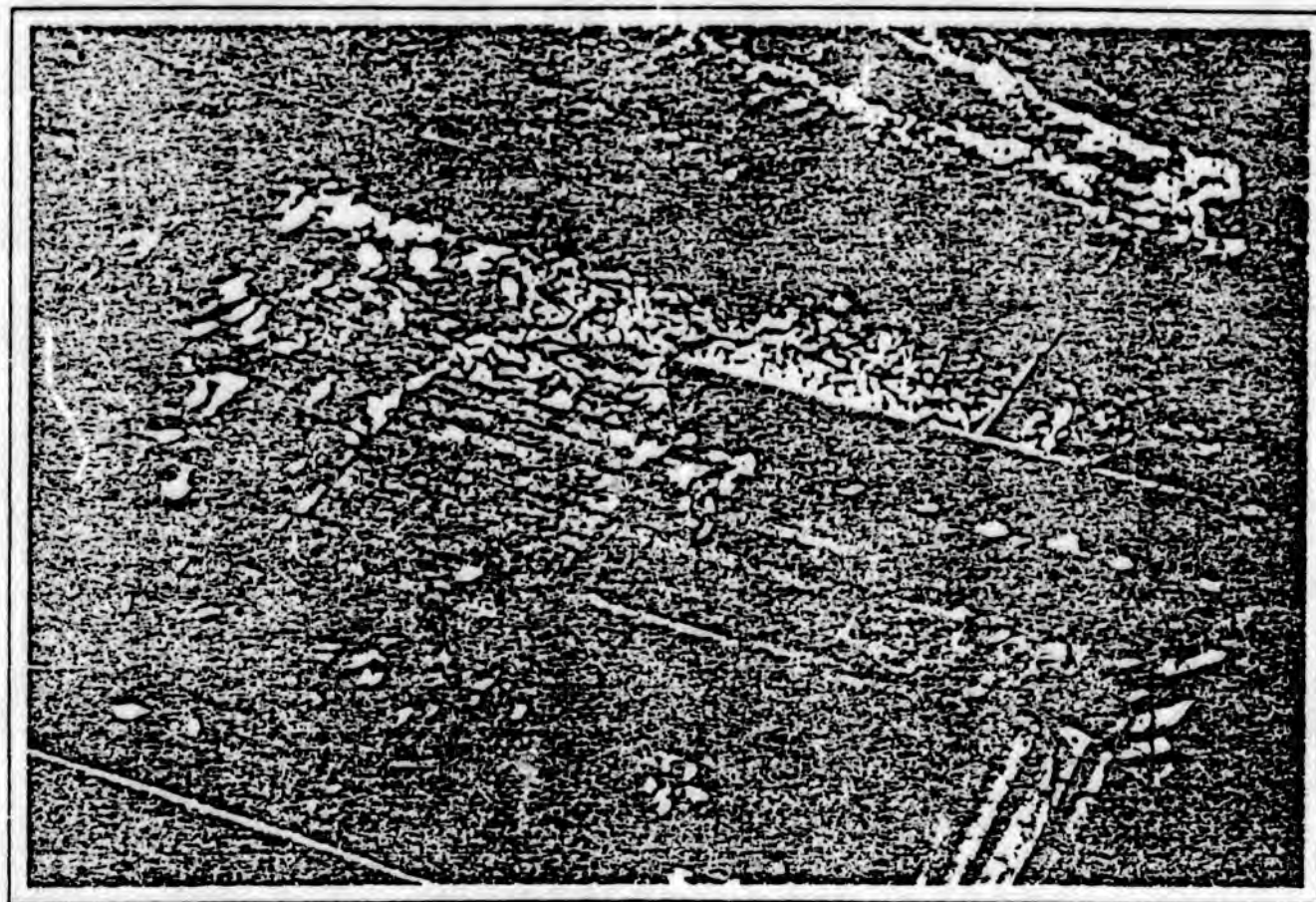
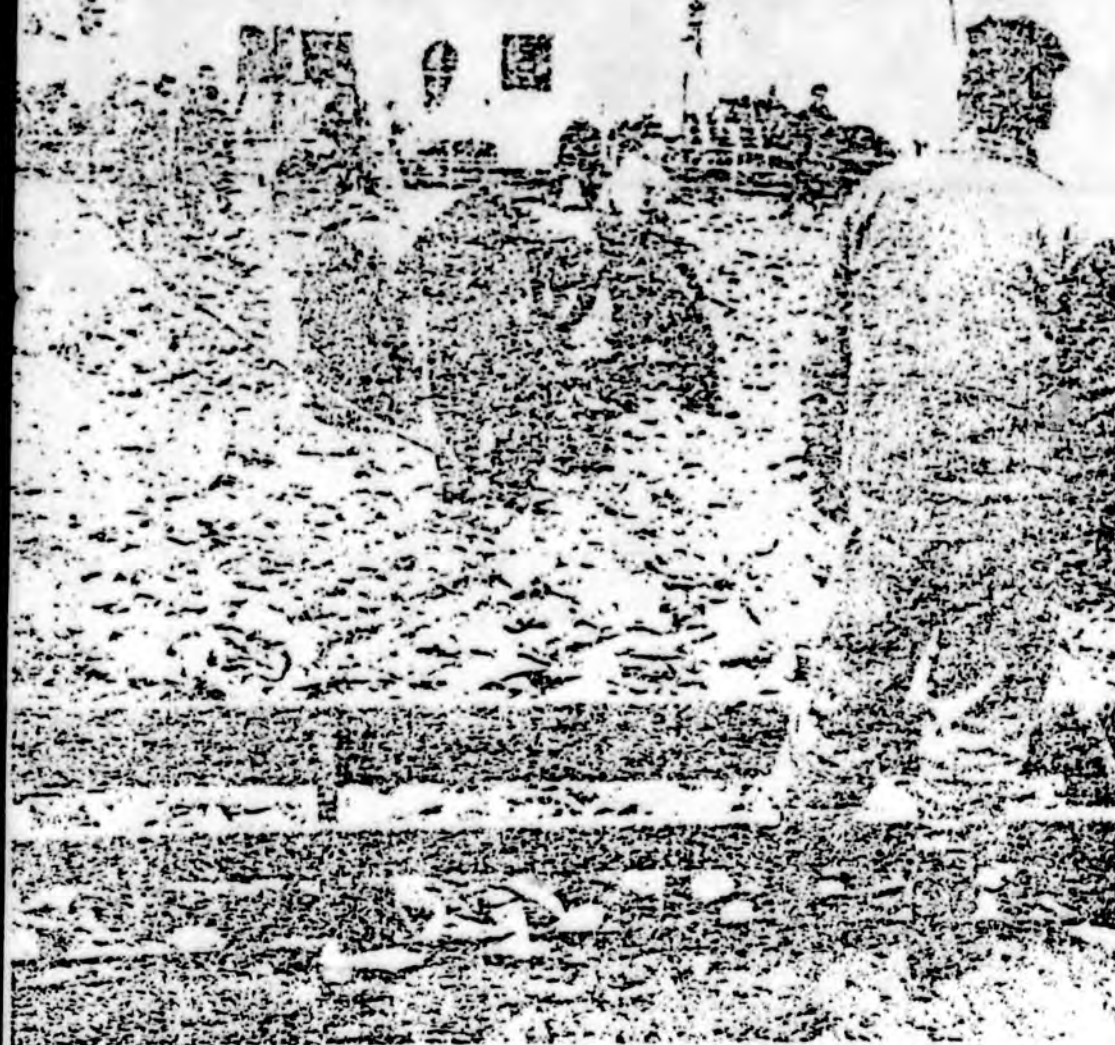


FIGURE B1 The deck of a foreign trawler fishing off Kodiak Island. Note the white sided halibut apparent on the deck from their size and shape.

National Marine Fisheries Service

5(A)



389 76
530 78
1125-81

FIGURE 13.1. A mixed catch of many species of groundfishes on the deck of a Japanese factory ship operating in Bristol Bay. The problem of managing two species to obtain the maximum catch is far harder than that of managing one, and the difficulties are multiplied as each additional species is added. Some species will suffer overexploitation and others will be underfished.

Bureau of Commercial Fisheries, Alaska

5 (B)

Table 5. Catch by sport fishermen (thousands of pounds).

Area	1977	1978	1979	1980	1981
Alaska					
Southeastern	110	115	246	467	411
Prince William Sound	23	18	32	59	47
Kenai	285	257	315	404	517
Kodiak	19	32	57	69	129
Total	437	422	650	999	1,104
British Columbia	17	9	18	11	12
Washington	17	10	19	22	20
TOTAL	471	441	687	1,032	1,136

* Estimated from the 1977-80 catches.

INCIDENTAL CATCH OF HALIBUT

Halibut are caught in many fisheries other than the commercial setline, troll, and sport fisheries. Although regulations require that incidentally-caught halibut be returned to the sea, many of the released fish die from injuries received during capture. Nearly all halibut caught in foreign trawls and domestic crab pots, and about half of those caught by domestic trawls and foreign setlines, do not survive. In recent years, the incidental catch has nearly equalled the commercial catch and, therefore, the impact of incidental catches on the halibut resource is significant.

Estimates of the incidental catch are not precise and may change as additional information becomes available. Incidental catches by foreign trawls, foreign setlines, and domestic trawls are estimated from data collected by observers who sample the catch at sea. Incidental catches by domestic shrimp trawls and crab pots are based on data collected during research cruises.

In 1980, the most recent year for which data are available, the estimated total incidental catch was 20.4 million pounds, comparable to the commercial catch of 21.8 million pounds. Incidental catches have risen sharply since 1975 and are again at the high levels of the late 1960s and early 1970s. Increases in 1980 occurred primarily in the foreign trawl and crab pot fisheries in Area 4 and in the foreign setline fishery in Area 3. The incidental catch of halibut by regulatory area and fishery is presented in Table 6.

Table 6. Estimated incidental catch of halibut by regulatory area and fishery, 1980 (in million of pounds).

Fishery	Area 2	Area 3	Area 4	Total
✓ Foreign Trawl	0.2	3.2	7.0	10.4
✓ Foreign Setline	Trace	1.9	0.1	2.0
✓ Domestic Fish Trawl	2.7	0.1	0.5	3.3
✓ Domestic Shrimp Trawl	Trace	0.1	Trace	0.1
✓ Domestic Crab Pot	0.3	3.1	1.2	4.6
Total	3.2	8.4	8.8	20.4

None of this even addresses the considerable amount of halibut that is caught by the "Charter" boats.

5 (D)

1980
INCIDENTAL
CATCH
20.4
MILLION
Lbs

It is feared that the prospect of a limited entry system will cause substantial numbers of people with no previous participation or stake in the fishery to consider entering the fishery for the first time, solely in the hope of gaining a financially valuable right in the fishery under any limited entry system which might be adopted. A sudden influx of new participants during the period prior to implementation of a permanent limited entry system would have several undesirable effects:

(1) It would allow an unlimited increase in pressure on the halibut resource;

PAGE

(2) It would allow unlimited reductions in the average harvests of individual participants and hence reductions in per-vessel earnings;

(3) It would increase the number of individuals whose participation in and dependence on the fishery would have to be taken into account in the establishment of a limited entry program, and whose participation in the fishery might have to be terminated;

(4) It would result in additional and excessive investment in vessels and gear, much of which might have to be involuntarily retired in the establishment of an effective limited entry program.

PAGE

The moratorium would not apply to that portion of area 4 north of 56° N. latitude in order to implement a provision of § 5(1) of the Act authorizing the Council:

to 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.

The Bering Sea is Spawning & Breeding Ground!

IS this a conscious plan at some level to so depress the Halibut Stocks by over exploiting their breeding areas to create a scarce high priced market for this beautiful fish. Please see following attached.

6

Halibut Stocks

over exploiting their breeding areas to create a scarce high priced market for this beautiful fish. Please see following attached.

DRAFT

lawfully recorded in the name of that person on the document of sale (State fish ticket or equivalent) required by law. The moratorium would not apply to that portion of area 4 north of 56° N. latitude in order to implement a provision of § 5(c) of the Act authorizing the Council:

to 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.

Why would Alaskan legislators want to agree to the establishment of a commercial fishery in a breeding area?

This is very nearly a violation of Article I, Section 9, paragraph 6 of the Constitution of the United States of America.

any state

No preference shall be given by any regulation of commerce or revenue to the ports of one state over those of another; nor shall vessels bound to, or from, one state, be obliged to enter, clear, or pay duties in another.

harvest halibut in the area of

had obtained all necessary permits.

It should be noted that the Council has not yet determined whether a limited entry system should ultimately be adopted, or what form any such system

No bill of attainder or ex post facto law shall be passed.

bills of attainder LEGISLATE away the rights of an individual (or group). Ex post facto law makes an act legal or illegal RETROACTIVELY.

(NPFMC - Draft for Proposed Moratorium)

No title of nobility shall be granted by the United States:
U.S.A. 117

The creation of a special class. "Titled" fishermen would be the exclusive owners of a portion of the public domain. (NPFMC - Draft For Proposed Moratorium)

Article 1, Section 9, Paragraphs 3 and 8 of the Constitution of the United States of America

In Europe the trend of the total halibut catch after 1930 was downward, in spite of a rising demand as shown by the increase in the average price of halibut in England whose market absorbs over 75% of the European production. The rise in price of competing species showed lower percentage increases.

The downward trend in the European production was temporarily halted in 1936 by the development of a short-lived net fishery for spawning halibut in Norwegian fjords in which 2,500 fishermen participated during the winter of 1936-37 (Devold, 1938). After the respite in fishing due to World War II, the trend of the European catch rose as the fleet was rebuilt and fishing was undertaken on the stocks accumulated during the war.

The rise after the end of World War I in 1918 and subsequent decline after 1930 has already had its counterpart after World War II; and the decline has been more abrupt than during the 1925 to 1935 period, because the Greenland-Labrador regions did not sustain the total catch to the extent that they did from 1925 to 1935. The uncontrolled European production did not level off at about 15 million pounds annually as predicted in 1958 (Bell and Pruter, 1958). Instead by the mid-1970s it was one half that amount, 7.7 million pounds in 1974 and still declining. This is a marginal production caught by trawl gear and consisting chiefly of juvenile fish under five years of age. Due to the great complexity of trawl fisheries, particularly those of North Europe, it is unlikely that any practical measures can ever be taken to restore halibut productivity.

In the Pacific halibut fishery, retention of trawler-caught halibut was prohibited. This led by about 1960 to the attainment of a maximum sustainable yield in the vicinity of 70 million pounds annually consisting almost exclusively of adults ranging from 6 to 25 and more years of age.

This utopian state, first time achieved in an exploited marine fishery, was soon to come to an abrupt end. A sharp increase during the 1960s in the catch of trawler-caught species by the large fleets of foreign trawlers, commenced to levy their toll upon both the adult and juvenile populations of Pacific halibut. The decline of the Northeast Pacific resource has been more rapid than was the case in Europe.

Some sections of the Northeast Pacific seabed, the Goose Islands grounds with a very considerable bottom trawl fishery, show a pattern of decline similar to that experienced by the halibut of the North Sea and the grounds off New England. In those two regions where once there was a very considerable production of halibut, the species has become almost a rarity.

At Georges Bank, off New England, once an important halibut producing area in early days, halibut production totaled in 1930 only 1,168,461 pounds, of which 708,023 pounds were taken by line gear and the remainder by bottom net trawls of various sizes. By 1968, the total halibut caught was 17,530 pounds, all by bottom net trawls.

In the heavily trawled North Sea the catch of halibut had declined by the 1970s to a level of about 500,000 pounds annually, only about 10% of what it was in the mid-1920s, and even farther below the level that prevailed prior to World War I in the late 1890s and early twentieth century (Figure 72).

Goose Islands grounds off British Columbia that had been a high producing ground since it was first fished in 1902 was, in the 1970s producing only about 1 million pounds of setline-caught halibut annually and in some years less. As recently as 1955, production was at the 6 million-pound level. It is to be observed that during the succeeding 20 years domestic trawling increased sharply and the efficiency of the vessels at least doubled.

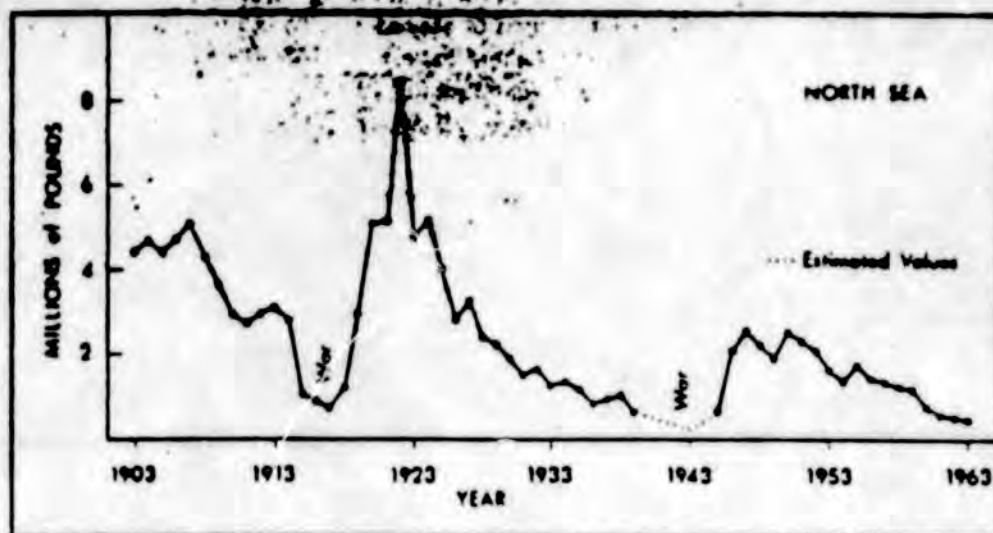
Grounds off Iceland provide a good example of what happens to a halibut resource exposed to a trawl fishery. That region of the Northeast Atlantic has accounted for a very large proportion of the total Northeast Atlantic halibut catch during the past 70 years. It is fished by a number of nations, which tends to buffer any effect that undue fluctuations of one nation's catch might have upon the overall production trends. Halibut has been caught by both setline and trawling in varying proportions over the years. However, unlike the Pacific Coast, the taking of halibut has been subject to no controls except those of two world wars and general economic conditions.

As the halibut fishery by trawlers and setliners off Iceland developed in the twentieth century, the catch by all nations in 1907 reached a total of nearly 9,000 metric tons (19.8 million pounds). Despite an intensified fishery effort, halibut production fell 50% by 1913 to about 4,300 metric tons (9.3 million pounds). After World War I, during which fishing had practically ceased (*Kriegsachonzett*), the rebuilt fishing fleets caught 6,600 metric tons (14.5 million pounds) in 1923 from the recovered stocks. Again, under the pressure of massive increases in fishing effort, the total catch had declined to about 2,600 metric tons (5.7 million pounds) by 1938. Granted another respite by World War II, the stocks again recovered, and by 1950 the fully rebuilt fleets of Northern Europe were able to catch 5,900 metric tons (13 million pounds) of halibut off Iceland.

With no further "war holidays" as yet, the overall catch of halibut by all nations off Iceland had

9 (A-1)

1915-1916 Landings
from the North Sea
1915 to 1916



undergone another dismal decline over the past two decades. The 1,900-metric-ton (4.2-million-pound) level of the mid-1970s represented a drastic 71% decline from that prevailing after World War II.

The Northeast Pacific halibut fishery seems to be following the same course that prevailed in the North West Atlantic. From earliest times Gloucester, Massachusetts, was the most important halibut port in New England with Boston in the second place and Portland, Maine, a very low third. Practically all the United States catch of Atlantic halibut was landed in the early years in Maine and Massachusetts except for small amounts in New Hampshire, Rhode Island and Connecticut.

From historical information at hand the above annual average landings for the decade 1890-99 should probably be lowered about two million pounds annually as rail shipments from the Pacific Coast were reported along with the ex-vessel landings in some New England ports in those years, particularly in Boston. Also, prior to about 1915 an average of about one to two million pounds of the reported production of halibut were probably salted flakes, many of which were taken in the distant waters of Davis Strait and Iceland.

The statistics in the Table 36 beginning with the 1920s are a reasonably accurate estimate of the declining trend of ex-vessel landings of ice halibut in New England. The average rate of decline from one decade to the next is over 40%.

It is usually stated that the declining supplies of Atlantic halibut prompted the more venturesome to look to the Pacific in the late 1880s. While this was true to some degree, there was also a great increase in demand with the rapidly expanding population in the industrial states of the East. Such near grounds as Nantucket, No Man's Land and even offshore

TABLE 36. Average Annual Landings of Halibut in New England in Eviscerated, Heads-off Pounds

Period	Landings*	Period	Landings
1870	10,650,000	1930-39	1,770,000
1880-89	8,300,000	1940-49	415,000
1890-89	9,100,000	1950-59	278,000
1900-09	2,380,000	1960-69	208,000
1910-19	2,450,000	1970-71	166,000
1920-29	2,820,000		

* From April 1918 through 1921 landings include some by Canadian vessels under reciprocal agreement between Canada and United States.

George's Bank could no longer supply the expanding market, and many New England vessels had to proceed to the more distant banks off Nova Scotia and Newfoundland to maintain production.

During the first 30 years of the twentieth century, United States production of Atlantic halibut remained relatively stable except during the late years of World War I. In the second 30 years of the century the scene changed radically as can be seen in Table 36. With the rapid expansion of domestic trawling on all the well-known halibut grounds, the overall production of Atlantic halibut fell precipitously. With the expansion of trawling in the late 1920s the halibut caught by United States vessels on the East Coast in the mid-1970s is less than 10% of what it was in the early 1930s.

There is no reason to believe that the Pacific halibut stocks are not as vulnerable, although there are probably many who will say that it "could not happen here." While extrapolating the New England experience to the Pacific scene, including the sharp decline in halibut, it can be seen that production is fraught with the same hazards. If the destruction of

9(A-2)

young recruits by trawling is not stemmed or stayed promptly the extinction of the Pacific halibut fishery will be more traumatic and more rapid than was experienced by the halibut stocks and fishery off New England.

It cannot be proven beyond all reasonable doubt that trawling for other species of demersal fish has been the prime cause of decline in halibut yields in all parts of the northern oceans, but to disregard the consistency and timing of the circumstantial evidence

would border on the irresponsible. To credit the declines to some long-term changes in survival or recruitment conditions in all parts of the Northern Hemisphere but with each part having its own time scale is even more untenable.

The Halibut Commission reports of the 1970s seem to lean to the idea that some of the decline in the stocks in the 1980s is due to a long term decline in recruitment. This of course takes some of the responsibility off the foreign and domestic trawl fisheries.

9(A-3)

This complex pattern of movements indicates that the halibut stocks are interrelated and that intermingling is extensive, a factor that must be considered in the management of the fishery.

REPRODUCTION AND DEVELOPMENT

Maturity varies with sex, age, and size of the fish. Most males are mature by the time they are 8 years old, whereas the average age of maturity for females is about 12 years. From November to March mature halibut concentrate on spawning grounds along the edge of the continental shelf at depths from 100 to 250 fathoms. Spawning occurs annually. The major spawning sites include Cape St. James, Langara Island (Whaleback), and Frederick Island in British Columbia and Yakutat, Cape Suckling-Yakutat ("W" Grounds), Portlock Bank, and Chirikof Island in Alaska. Other reported spawning locations include Goose Islands, Hecate Strait, and Rose Spit in British Columbia and Cape Ommaney, Cape Spencer, and Cape St. Elias in Alaska. Spawning concentrations also occur in the Bering Sea. In addition to these major grounds, there is reason to conclude that spawning is widespread and occurs in many areas, although not in as dense concentrations as those mentioned above. Evidence to support this conclusion is based on the widespread distribution of mature halibut during the winter months as indicated by research and commercial fishing.

The number of eggs produced by a female is related to its size. A 50-pound female will produce about 500,000 eggs, whereas a female over 250 pounds may produce 4 million eggs. The free-floating eggs are about 8 mm in diameter when released and fertilization takes place externally. Developing ova generally are found at depths of 100 to 250 fathoms, but occur as deep as 250 fathoms. The eggs hatch after about 10 days, depending upon water temperature. The eggs and larvae are heavier than the surface sea water and drift passively in deep ocean currents. As the larvae grow, their specific gravity decreases and they gradually move towards the surface and drift to shallower waters on the continental shelf. The entire life cycle of halibut is depicted in Figure 1. Postlarvae may be transported many hundreds of miles by the Alaskan Stream which flows counterclockwise in the Gulf of Alaska and westward along the Alaska Peninsula and Aleutian Islands. Some of the larvae are carried into the Bering Sea. The velocity of this current may exceed a mile per hour in certain coastal areas, but overall speeds of 3 to 5 miles per day are more typical.

Halibut larvae begin life in an upright position with eyes on each side of the head. Nutrition is derived from a prominent yolk sac until it is absorbed during the early postlarval stage; then the young fish must begin feeding on small planktonic organisms. When the larvae are an inch long, an extraordinary transformation or metamorphosis occurs: the left eye moves over the snout to the right side of the head and the pigmentation on the left side fades. When the young fish are about 6 months old, they have the characteristic adult form and settle to the bottom in shallow inshore areas. Detailed drawings of these early life history stages are depicted in Figure 5.

The survival of young halibut is affected by the environment and the abundance of the year classes varies accordingly. Juveniles from 1 to 3 years old generally remain in relatively shallow inshore waters and usually are

Alaska and the Arctic

most portentous developments is the concept of the "island mother ship": already on the drawing boards, such vessels would replace the present generation of factory ships. They could remain on the fishing grounds for up to four years.

A Polish proposal envisions a mother ship 220 meters long. It would accompany a fleet of 40 trawlers, each 45 meters long and capable of landing 1,000 tons of fish per day. The mother's stern would be split in a squared-off Y-shape to allow protective docking of trawlers and special transports. A mother ship would take on raw fish, process it, and then transfer it to the transport vessels, which would ferry the catch home and return with supplies for the fleet.

Although the island mother ship would seldom move about, it would support the equivalent of a factory town devoted exclusively to processing fish. This would require an estimated 100,000 tons of diesel fuel per year, a prohibitive prospect, so the Polish design calls for the mother to be nuclear powered. Its swarm of trawlers could use electric accumulators, charged by the mother vessel, for at least part of their energy needs.

If such awesome creations as island mother ships ever get off the drawing boards and on the ocean, they may be hard to stop. Once shelf fisheries became unprofitable, or protected, the new matriarchal fleets could probably literally clean up on the continental slopes in deep international waters.

Two University of British Columbia analysts, one of them a mathematician, recently showed that the extinction of fishery resources can be profitable. Diminishing returns will not necessarily halt overexploitation short of extinction because rarity may make certain species extremely valuable as has happened with the abalone. Other examples of fisheries proceeding steadily toward the vanishing point include certain species of whale, and perhaps the Pacific halibut and Atlantic yellowtail flounder.

Even in the far north, endangered creatures such as the bowhead whale and various seabirds remain in some jeopardy. Eskimos have traditionally hunted these creatures, and they have been given dispensations from protective federal laws and international treaties. Today they continue to pursue their old ways for subsistence purposes, even in areas designated as wildlife refuges.

As several of the attached letters state - the proposed moratorium and limited entry for Pacific halibut seems to be motivated by greed and the desire for high profits. The creation of a "high priced limited resource" by the group who pushed this moratorium issue.

9(C-1)

1981 IPHC Annual Report

Appendix II. Annual landings, ex-vessel price, and value (U.S. dollars), 1929-1981.

Year	Catch (000's pounds)	Price (dollars/ pound)	Value (000's dollars)	Year	Catch (000's pounds)	Price (dollars/ pound)	Value (000's dollars)
1929	56,928	.12	6,831				
1930	49,492	.10	4,949	1960	71,605	.16	11,457
1931	44,220	.07	3,095	1961	69,274	.21	14,548
1932	44,454	.04	1,778	1962	74,862	.30	22,459
1933	46,795	.06	2,808	1963	71,237	.21	14,960
1934	47,546	.06	2,853	1964	59,784	.23	13,750
1935	47,343	.07	3,314	1965	63,176	.32	20,216
1936	48,923	.08	3,914	1966	62,016	.34	21,085
1937	49,539	.08	3,963	1967	55,222	.23	12,701
1938	49,553	.07	3,469	1968	48,594	.23	11,177
1939	50,903	.07	3,563	1969	58,275	.38	22,144
1940	53,381	.09	4,804	1970	54,938	.37	20,327
1941	52,231	.10	5,223	1971	46,654	.32	14,929
1942	50,588	.15	7,588	1972	42,884	.64	27,446
1943	53,699	.19	10,203	1973	31,720	.74	23,488
1944	53,435	.18	9,618	1974	21,306	.70	14,914
1945	53,305	.15	8,009	1975	27,616	.89	24,578
1946	69,266	.17	10,225	1976	27,535	1.26	34,694
1947	55,700	.17	9,469	1977	21,868	1.31	28,647
1948	55,562	.17	9,446	1978	21,988	1.70	37,380
1949	55,025	.17	9,352	1979	22,532	2.13	48,080
1950	57,234	.23	13,164	1980	21,806	.99	21,647
1951	56,045	.17	9,528	1981	25,732	1.02	26,247
1952	62,267	.19	11,830				
1953	59,837	.15	8,976				
1954	70,583	.17	11,999				
1955	57,521	.14	8,053				
1956	66,588	.22	14,649				
1957	60,854	.17	10,345				
1958	64,508	.21	13,547				
1959	71,204	.19	13,529				

TABLE 7. The Average Annual Number of Canadian and United States Vessels Over Five-hat Tons in Halibut Fleet and the Manpower of Respective Crews

Period	Vessels		
	United States	Canada	Total
1928-30	344	108	452
1931-35	314	105	419
1936-40	253	162	415
1941-45	374	170	544
1946-50	518	229	747
1951-55	439	246	684
1956-60	367	105	472
1961-65	282	207	489
1966-70	217	164	381
1971-74	188	123	311

*Including Captain

9(c-2)

Although this letter has been written
by the Kodiak Group - our South
Central Contingent is in total
agreement with every thing
contained therein ~~and~~ wish
this to be recorded as part of
our statement. Thank You!

ALASKANS OPPOSED TO FISHERY SHARES

POUCH 490 • KODIAK, ALASKA 99615

February 1983

Fellow Alaskan Fishermen:

This letter is to remind you that the North Pacific Fishery Management Council is now accepting written public comment on the proposed moratorium on entry into the halibut fishery in Alaska.

Although temporary by definition, a moratorium IS in fact a limited entry system, and if implemented will set irreversible forces in motion that will lead to the ultimate adoption of a limited entry system. The Council has contracted with a consulting firm to design a share-quota management plan for the halibut fishery. The share-quota system is the limited entry plan most preferred by the NPFMC's fishery economists, and is the system being pushed by several fishermen's organizations from Southeast Alaska.

It is VERY important that all fishermen express their opposition to the proposed moratorium as soon as possible. Please consider the following:

1) The halibut resource is NOT "depressed", as is stated in the proposed moratorium. Halibut are abundant. The quotas have been INcreasing for the last 5 years. The catch per unit effort has dramatically increased. In SE Alaska the CPUE went from 42 lbs. per skate in 1976 to 178 lbs. per skate in 1981 - a 348% increase - which means the halibut fleet caught halibut 3.5 times faster in 1981 than it did in 1976, which should automatically reduce fishing days to around one-third of the fishing days in 1976. Is the problem, rather than too many fishermen, actually that there are TOO MANY FISH??? Since the resource is healthy, why do we need a moratorium?

2) The fishing industry in Alaska has historically evolved on an open-access theme, with fishermen having and exercising their freedom to diversify between fisheries to survive. Because of this, ALL fisheries are closely interrelated, and it is commonly known that the effects of limited entry regulations in one fishery will "spill over" and be felt in other fisheries. Yet the Council has not considered the effects of this irreversible action on diversified fishermen, other fishermen, or on the fishing industry in Alaska as a whole.

3) The moratorium will create a "pool" of fishermen - qualifiers based on their participation during the arbitrarily chosen time frame of 1978-1982, from which those few fishermen who will receive fishing rights under ANY permanent limited entry system (including a share-quota plan) will ultimately be selected. Diversified fishermen traditionally fluctuate between various fisheries according to natural variations of resource populations and market conditions. Dependence on any one fishery, such as halibut can not be defined by selecting any certain time frame.

4) As currently written, the moratorium will allow every fisherman who made a delivery between 1978 and 1982 to keep fishing until a permanent limited entry scheme is developed. However, several fishermen's organizations from Seattle and Southeast Alaska are working to get moratorium fishing rights attached to the vessel owner

Full —

rather than the actual fisherman, if they are two different people. In addition, these influential organizations are insisting that during the moratorium, no fisherman will be allowed to fish from any vessel which is more than 10% larger (net tonnage) than the vessel he fished prior to the moratorium. If a person owns more than one vessel he will get more than one permit. If a vessel is owned by more than one person, they will have to argue amongst themselves to see who gets the permit. The NPFMC DOES have the legal authority to radically change the wording of the moratorium after the public comment period, and the Council is receiving extreme pressure to limit vessel sizes.

5) The tremendous amount of halibut caught incidentally by foreign fleets in U.S. waters is denied to U.S. longliners. Is it fair to limit entry of U.S. fishermen into the halibut fishery, while a large portion of the optimum yield is allotted to foreign incidental catch?

6) The halibut fishery in Alaska is managed by quotas set by the International Pacific Halibut Commission. The Northern Pacific Halibut Act of 1982 requires that limited entry systems be "reasonably calculated to promote conservation". The increasing abundance of halibut is a tribute to quota management. This is NOT a conservation issue. The quotas will be set and administered regardless of the number of participants in the fishery.

7) One of the problems in the halibut fishery identified by the Council is that large amounts of halibut are caught all at once and stored by brokers for the rest of the year, resulting in a poor quality product. There are management techniques available to the IPHC, similar to those used by the ADF&G, which would spread the catch of fish over a longer period of time. Limiting entry into the fishery will not provide longer seasons unless a MASSIVE number of fishermen are eliminated. Which ones will be eliminated?

8) Another problem identified by the Council is that fishermen no longer make a significant portion of their income from halibut fishing. Is this a problem? To a diversified fisherman, all portions of his income are significant. The idea of making one's income entirely from just one fishery is not realistic.

LETTERS SHOULD BE ADDRESSED TO:

JIM BRANSON
EXECUTIVE DIRECTOR
NPFMC
BOX 3136DT
ANCHORAGE, ALASKA 99510

COPIES OF YOUR LETTER SHOULD BE SENT TO THE FOLLOWING PEOPLE:

Dr. John V. Byrne, Administrator - NOAA- Hoover Dept. of Commerce Bldg., Washington, D.C. 20230; Gov. Bill Sheffield - Pouch A- Juneau, Ak. 99811; Your STATE LEGISLATORS - Pouch V (MS 3100) - Juneau, Ak. 99811; Rep. Don Young - Longworth Bldg., Suite 1334 - Washington, D.C. 20515; SENATOR TED STEVENS - Old Senate Office Bldg., Room 411 - Washington D.C. 20510, Senator Frank Murkowski - Russel Senate Office Bldg., Room 15B - Washington, D.C. 20510, David Stockman, Attn. Vivian Rivera, Office of Management and Budget, Executive Office Building, Washington D.C. 20503.

THESE MAILINGS ARE EXPENSIVE AND WE WOULD LIKE TO CONTINUE. WE OPERATE SOLELY ON DONATIONS FROM FISHERMEN. PLEASE DONATE TO AOFPS.

February 13, 1983

TO WHOM IT MAY CONCERN:

As an American and as a small boat fisherman, I am against Halibut Moratoriums and share quotas...and this chipping away of a man's right of life, liberty, and the pursuit of happiness is the main reason I am foremost against gun control.

I have lived in Alaska since 1965 and have worked for the federal government for 32 years. I am 52 years old. I have raised 4 children and 2 stepchildren without drawing one day of unemployment, welfare, food stamps or any other type of support.

I first got a halibut permit in 1977 and fished a 22-foot skiff the first part of the season without much success. In 1978 I bought a government surplus work boat, 26' x 9' from, of all places, Lake Meridith, Texas; bought a truck to tow it. My wife, my father-in-law, and myself spent 18 days on the road, blew an engine in Leathridge, Canada, which cost \$850 to repair. But all in all it was a hell of a lot better buy than the one in Alaska. We outfitted and modified it for halibut fishing, fished the last part of the season, and caught a few hundred pounds. Not knowing what I was doing and not knowing the waters, I thought we did pretty good. In 1979 I blew an outdrive and missed most of the season. Also, because I work for the government, I can't take leave whenever I want to. In 1980 I got a little smarter and caught some fish, peddled them in Anchorage at \$1.75 a pound. Booth Processing Plants in Seldovia were closed down. Homer processors were paying 92¢ a pound.

I bought a house in Seldovia, Alaska; not much of a place, but a good place to store my boat and gear. I bought the property without a loan from the State or kissing some banker's a__, or politician's. You see, there are no state loans available for the working class of people. I plan to retire in a few years and I thought halibut fishing would help supplement my retirement. I didn't think I would be any great threat to the big boat operators.

Now I hear noise from a group of gutless wonders in 3-piece suits, saying I may not be able to do my fishing and enjoy my retirement, making a few dollars in the process to support me and my wife. I have invested a lot of time and money in this small, yet reasonable, dream.

I feel very strongly about doing whatever is necessary to see that my dream is fulfilled. Greed is the main reason that this lock-up for "the chosen few" is being pushed. Just like the salmon limited entry. Just how in hell can the small boat fisherman hurt the blue water, big boat fishermen? Don't push these small boat fishermen to the point that they

stop talking and start taking physical action. After a fish war gets started, it's hard to stop. My boat flies the Old Republic flag. A rattlesnake with these words, "Don't Tread On Me". I mean to fly it with honor.

Sincerely,

Clarence L. Beabout

Clarence L. Beabout
P. O. Box 10-971
Anchorage, Alaska 99511

I feel very strongly about this rip off as you can plainly see. When a greedy few are allowed to take away a man's right to earn a living by the sweat of his brow. Then I for one, feel the time for talking and pleading & begging has past. These bastards work 24 hrs a day plotting ways to control your lively hood or take the very food from your mouth. I mailed this letter to Senators, Representatives, Alaska Commission and anyone else I could think of but I feel it is a waste of time they have already made up their minds to cut out the small boat fishermen.

February 14, 1983

Association of Halibut Fishermen
S/R 1 Box 2030
Chugiak, Alaska 99567

Subject: Questionnaire on proposed Moratorium/Limited Entry.

Accompanying this letter is the completed questionnaire as requested.

In my opinion fellows, the majority of the serious Halibut fishermen are missing the real issue in regards to any potential dangers in this moratorium/limited entry or share quota systems.

The questionnaire addresses only one of the major problems in this fishery, that being the incidental catch of Halibut by the foreign vessels. Anyone who avails himself of the data available by the biologist (IPHC), he will quickly learn that the resource is capable of producing (x) number of millions of pounds of Halibut each year. Of that yield about one third is taken by the foreign vessels as incidental catch. Another third is taken by stored king crab pots and the balance is what we see each year become our allotted commercial harvest. 1/3

At this point, one must decide where in reality the culprit is. Assumeing the annual quota were to remain the same, which by the way, has not changed dramatically over the last several years; where is the bulk of the annual allotted quota going? Well, its no secret that there are well over nine thousand registered vessels participating in the fishery, but only a very small percentage of the catch is going to those vessels. The truth is, the forty or fifty vessels in the "Seattle White Fleet" are taking the vast majority of the allowable catch, why? Because they are the people who are successful each year in gaining the specific openings (early May & June) which are beneficial only to them, since the large schools of Halibut are laying in the deep waters well offshore at that time of year, and they know the average small boat operator is unable to operate in those waters and compete.

As far as a limited entry program is concerned I have mixed feelings. There is no doubt in my mind that something must be done to discourage the "weekend warriors" who's only interest is writing off the costs of their toys under the vail of being a "commercial fishermen", by entry into this fishery. This problem could easily be corrected by a number of methods, other than a limited entry program.

If I thought for one moment that a limited entry/share system would assure me of a greater piece of the rock, then I would vote for it in a second, but it won't and it cannot!

The only way anyone is ever going to survive in this fishery is if the following were to take place.

- * 1. Eliminate the foreign bottom trawl fishery within the territorial waters of the US and Alaska.
- * 2. Require the king crab fishery to close all doors to a pot that is not leagally being fished, before it can be stored in the ocean waters
- * 3. Ammend the existing areas as we now know them, by reducing their geographical size and reassign the annual quotas (annual commerical yield) of Halibut so that certain areas can only be fished at certain times of the year, by certain sized and equiped vessels. This would keep the large vessel out in the waters where they operate best and would allow that area only a certain percentage of the annual commerical yield.

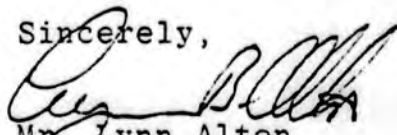
In my opinion, this can easly be done, by requiring minimums and limits and gear and vessel sizes for any specific area and would thus spread the harvest of fresh Halibut through out the summer months and would further allow the serious small to medium sized operator an equal opportunity to compete.

As it stands presently, there is no competition in this fishery. It all belongs to the Seattle White Fleet, and you can bet you sweet ass, they intend to keep it that way as long as possible.

The ONLY way the Halibut fishery is every going to be a serious fishery is when each and every bonified vessel owner collectively joins together and lets those turkeys in Washington D.C. know that we are sick and tired of their political trade offs with the foreign governments. That this is OUR fishery and our lively hoods their screwing with and its got to stop!

You may be sorry you asked by now, but thats how it all stacks up as far as I am concerned!

Sincerely,



Mr. Lynn Alton
9103 Jewel Terrace Street
Anchorage, AK. 99502

LBA/ra

February 17, 1963

NPFMO
Box 3136 DT
Anchorage, Alaska 99510

ATTENTION: Executive Director,
Mr. Jim Branson

Dear Mr. Branson:

As an Alaska Commercial Fisherman and Resident of Alaska for the past 36 years, I am opposed to the Halibut Moratorium, share-quota, Limited Entry system proposal.

My objections are based on the following points:

1. Limited Entry does not seem to alleviate the problems used to promote its adoption, example in point the "Alaska Salmon fishery".
2. Every Limited Entry program scheme so far has been dedicated to eliminating as many small boat fishermen as possible, shares or quotas. There is no way a skiff fisherman is going to compete for Entry against vessels of 40 net tons.
3. Halibut stocks seem to be increasing. Why the short openings? Could it be to create problems for fishermen and processors to bend their arms into accepting Limited Entry?
4. The real problem seems to be ever larger boats, laying out more and more gear. This is where the Limit needs to be imposed. Since it was the Seattle and Petersburg Halibut fishing fleet that asked for Limited Entry, by all means Limit them. They have the largest boats and the most gear in the water. Since they volunteered for the restriction put them on a boat by boat quota system and when this limit is filled they leave the grounds and go back to Port. Leave all boats under 5 net tons out of the Entry system. They are already handicapped by the size of their vessel. This could be a pilot project "try-out" for the volunteers. See how they like it.
5. The only sensible Halibut Limited Entry program presented, so far that I've seen, is that outlined by Nick Delaney, Kodiak fisherman (it is detailed in the Alaska Fisherman's Journal, January issue). But since it does contain good ideas based on a fisherman's trade experience, is fair to the smaller boat fisherman, allows the free enterprise system to work through entry in the lower echelons and was submitted by a Resident Alaskan fisherman, it probably doesn't stand a chance of consideration much less adoption.

6. REFER: Letter in Alaska Fisherman's Journal.
David Shrader to N.O.A.A.
Administrator, Dr. John Byrne.

SUBJECT: Public hearings on Halibut Moratorium.

From the information presented by Mr. Schrader, it has already been "cut and dried" on the system that the NPFMC is going to adopt. \$35,000.00 has already been expended on the viability of the program and if Mr. Shrader's information is correct the plan is almost off the drawing board.

I believe Mr. Shrader's plea for public hearings is a very Democratic one and stems from roots embedded in the principle of justice and equality for all and to let every man have his say. This, I am not opposed to, but from what I've seen so far of Alaskan town meetings, is that the decision has already been made for you, but the Constitution states by-law, that you shall have your say about it, but, whatever your ideas pro or con it doesn't alter the course, it's just a matter of rote; You've had a chance to express your thought or make a damn fool of yourself. Whatever your inclination and it's on record for posterity to refer to if you ever surface in the 'floatsom and jetsom' of the bureaucratic sea again.

Gentlemen, couldn't we just this once be honest and lay all the cards on the table and admit that the Moratorium embryo is well on the way to hatching and that Public meetings or further comment are Democratic and noble, but really is a waste of the officials time and taxpayer's money?

In closing, I would like to ask, what point in our professional lives as fisherman are the bureaucrats, at the Federal and State level, going to quit managing the fisherman and start managing the fishery resource that their jobs were created and funded for? Perhaps if the priority was placed on the fishery resource there would be less need of "Limited Entry schemes".

Yours Sincerely,

Raymond F. Carder
Raymond F. Carder,

F/V VI-RAY

Haines, Alaska 99827

cc: Alaskans Opposed to Fishery Shares
Mr. Jim Branson, NPFMC, Ex. Director
Gov. Bill Sheffield
Rep. Don Young
Dr. John Byrne, ADMINISTRATOR, N.O.A.A.

I have fished halibut for
five years starting at age 13
part time with working a beach
site for salmon on Valdez Island.

Last year I bought my own permit
and fished it myself with my own
boat at St. Pierre. My belief I

would not like to see limited
entry in the halibut industry because
it would make an elite group such as
the salmon fishermen and damage many
newcomers into the fishery such as myself.

Studies of limited entry reveal a lot of
damage to native inhabitants in the north
by sea + others because of limited entry.

Myself I have gillnetted salmon on a beachsite
and drift ^{boat} ~~limited~~ and feel unfortunate
I can't commercial fish it. Although I
have worked in that fishery myself for
7 years, limited entry makes an elite few
and ~~prevents~~ prevents younger people and others
from the rights they should be able to
have.

Yours Truly

Ally J. Gillham

18 year Alaskan resident

February 18, 1983

Dear Sir:

I am basically opposed to limited entry and support free enterprise. However, it is unjust that salmon fishermen can fish for halibut where halibut fishermen cannot fish for salmon without a very expensive limited entry permit. Perhaps the answer is to eliminate all limited entry so that all fishermen can diversify. Otherwise, I see no alternative to some sort of limited entry for halibut. Halibut is the only fishery left for newcomers that can not afford to buy a permit.

over

I am not a long time fisherman. I spent years accumulating enough money to buy a bottom-of-the-line gillnet vessel in Naknek and finally went fishing for herring in Togiak in 80. The season was a bust. The predictions for 81 were the same so, I hired up a boat in Seward to fish halibut in 81 on a share basis. Two ~~weeks~~ weeks before the season the boat owner changed his mind and my crew and I couldn't fish. I brought my boat to Anchorage and rebuilt it for longlining during the winter of 81/82 and fished halibut in 82. I probably won't qualify for a halibut limited entry permit and can't afford a salmon permit. I plan to fish halibut in 83.

Stephen Kurth

F/V Sea Critter

Questionnaire

1. Have you had enough information and time to consider and fully understand the moratorium for the Alaska halibut fishery?

Yes ☐

No ☒

2. Do you support the moratorium?

Yes ☐

No ☒

3. Would you support some form of international regulatory action requiring a reduction of the foreign fleets total incidental catch?

Yes ☒

No ☐

4. Do you feel foreign incidental catch should be reduced BEFORE a moratorium or limited entry is imposed upon the American halibut fishery?

Yes ☒

No ☐

5. List the years you have fished halibut.

Started around 1972 - Had a few summers of not fishing halibut due to working on new babies.

6. What is your approximate annual catch in pounds?

See 1b's

7. What size of vessel do you use? net tons

length *23' 10"*

Signature

Don L. Lowe

Date

2/22/83

Address

P.O. Box 850

Sitka, Alaska 99835

**See attached letter for my comments.*

I would like to make some comments concerning the direction the halibut fishery seems to be taking.

As it is now headed I would be left entirely out of the fishery. I didn't make any landings of halibut the year they want to make the moratorium effective because of a new baby and the way the season worked out around Sitka.

I started out with used Canadian gear out of a skiff (19' Rinnell) and during the first couple of seasons did as well as anyone in a skiff, especially for learning where to fish in the Sitka area and fishing by myself.

Then we were limited to four openings with it based on the filling of a quota. In Sitka it ~~wasn't~~^{wasn't} really worth going out the first two seasons because the traveler's (halibut) didn't arrive until the latter part of the summer in the Sitka area. Then we started missing out on the latter harvest due to the quota being caught and filled early by the fishing effort further North. Consequently, last year we wound up with one season - which I didn't make one landing on.

Now I'm really considered a pretty insignificant person in this fishery compared to big business - But to me it's an important source of income (at one time my sole income before re-marriage) and food for our table. There were some seasons in which I can not show one landing via the Buyer but I caught fish and kept for the freezer. It was more economical for me to keep them than sell them. Why should I pay the grocery store twice as much for a piece

of meat than I got paid by Sitka Sound Seafoods
for the fish I caught?!

Another interesting problem added to catching
halibut any other way than commercially was the
new state law - "if your boat is commercially licensed
you can not sports fish off the boat." Therefore getting
halibut for the table, if that's all you wanted to do,
became illegal - a boat so licensed was/is forced to
fish halibut commercially just to get some for home
use.

As usual every idea is geared to protect and
enhance the big guy. I don't think limited entry is
even necessary in this fishery. Especially since it is
already limited by seasons and quotas. It seems so
hard to get across all that the Halibut Fishery has
meant to me, does mean to me now and will mean in
the future to me. Bringing it to one simple idea - I
want to fish halibut. Why should I be deprived any
more than anyone else? - just so they can be
guaranteed a living?

I've been taking my chances with the weather,
seasons, limits, gear losses, quotas, theft and poor fishing
like everyone else and I prefer it stayed that way than
to lose the privilege entirely, as I surely will if the
NPFMC enforces a moratorium/Limited Entry Program as
now proposed.

Will you please consider my status which really
isn't too much different from many other small fishermen
and represent it on my/our behalf as fairly as possible.
Sincerely,
Ann L. Leve

Questionnaire

1. Have you had enough information and time to consider and fully understand the moratorium for the Alaska halibut fishery?

Yes X No

2. Do you support the moratorium?

Yes No X

3. Would you support some form of international regulatory action requiring a reduction of the foreign fleets total incidental catch?

Yes X No

4. Do you feel foreign incidental catch should be reduced BEFORE a moratorium or limited entry is imposed upon the American halibut fishery?

Yes X No

5. List the years you have fished halibut. 1960, 61, 62, 63, Vietnam Service
64-68, 69, 79, 80, 81, 82,

6. What is your approximate annual catch in pounds? 500

7. What size of vessel do you use? net tons length 22' Dory

Signature Dudley Kee Affair Date 3/14/83

Address P.O. Box 7037 NR13

Kenai, Alaska 99611

I am opposed to any form of limited entry that creates a class of privileged people with a public resource all Alaskans should be able to fish any Alaskan resource

for some one else

any thing I can do to squash this Halibut limited entry. Please let me know.

Thank

Cont. From other Sheet

Without Having to Come up with
20,000.00 to 100,000.00 Dollars
I Have Been fishing for Salmon Since
I was 13 years old, Due to Service
in Viet Nam I Did not get a Limited
entry Permit. Now I am trying
to Buy one But the People that
want to Sell them will not wait
for me to get financed thru the
State Loan Because they Can find
Cash Buyers, So in order to fish
I Have to work as a Crew member
for Some one else

any thing I Can do to Squash
this Halibut Limited entry Please
let me know.

Thanks

Dudley R. White



Bering Sea Fishermen's Association

805 West 3rd Avenue
Anchorage, Alaska 99501
(907) 279-6519

February 7, 1983

Representative Adelheid Herrmann, Chairman
House Subcommittee on Fisheries
Pouch V
Juneau, Alaska 99811

Dear Rep. Herrmann,

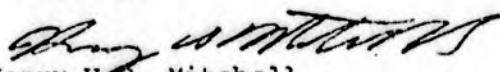
Bering Sea Fishermen's Association would like to express its strong support for the halibut license moratorium as proposed by the North Pacific Fishery Management Council. The fishermen of the Bering Sea communities feel that increased effort in the halibut fishery will lead to a decrease in economic worth of the industry. In addition, more halibut boats lead to shorter seasons making it increasingly difficult for the International Pacific Halibut Commission to safely manage and protect the resource.

We suggest that the Subcommittee also address the problem of incidental catch of halibut by foreign trawlers, domestic trawlers and the crab fleet. For 1981, the IPHC estimated a total incidental catch mortality of 13.3 million pounds, over half of the harvest level caught by U.S. fishermen in 1982. This problem needs to be addressed, especially in the Bering Sea where harvest quotas are low and incidental catch is high.

We strongly recommend that the House Subcommittee on Fisheries support the halibut moratorium as proposed by the NPFMC. In addition, we urge the Subcommittee to stress the importance of reducing incidental catch of halibut through support of more intensive observer coverage of foreign and domestic vessels and a decrease in foreign trawling in U.S. waters.

Thank you for your time.

Sincerely,


Henry V.E. Mitchell
Executive Director

In support of Moratorium only.



ALASKA LONGLINE FISHERMEN'S ASSOCIATION

Box 2234
Sitka, Alaska 99835
Telephone (907) 747-3400
Telex 46-314 HPC SIK

February 23, 1983

Representative Adelheid Herrmann, Chairman
Special Committee on Fisheries
Pouch V
Juneau, Alaska 99811

Dear Representative Herrmann;

The Alaska Longline Fishermens Association represents some 70 professional longline fishermen who harvest halibut, sablefish and rockfish in the Gulf of Alaska. Conservatively, we estimate that our members harvest in the neighborhood of 2 million pounds of halibut annually. By and large our members are longline fishermen and do not hold permits in any of Alaska's limited entry salmon or herring fisheries.

We would like to comment in regards to HJR10 and CSSJR7 which you have before you. Our first concern with both resolutions is the tying together of the proposed moratorium and the "concept" of an individual quota system. Hence it would be our first recommendation to the committee that the moratorium and the "concept" of an individual quota system be addressed separately. Secondly, we would recommend that the committee prepare a substitute resolution, supporting the moratorium, and forward that resolution to the parties listed in the Resolutions before you.

The halibut fishery is one of the oldest commercial fisheries in Alaska and, until recent increases in participation occurred, provided a dependable income for many Alaska fishermen and contributed to the economic welfare of many coastal communities.

EFFORT: Since 1976 however, several factors have led to a dramatic increase in effort which has resulted in shorter and shorter fishing periods until today the commercial halibut fishery is dubbed the "halibut derby" by fishermen, processors and managers alike. In 1977, for example, halibut fishermen were

able to operate for 73 days in Area 2C and 47 days in Area 3 while the 1982 seasons were 5½ and 11½ days respectively. Quotas remained fixed in Area 2C and in Area 3 went from 12.3 million to 17.6 million during the same period. Clearly, the decreasing seasons are due to effort increases, not changes in resource availability. Between 1976 and 1979 the number of under 5 net ton licenses increased 91% annually with a 70% annual increase in the over 5 net ton category. These dramatic increases were due in large part to strong ex-vessel prices, the Boldt decision which left many Washington and Oregon fishermen without a fishery, stability in the limited entry fisheries (salmon, herring) which encouraged expansion and capital investment in other fisheries: time/area closures for Alaska salmon trollers, and speculation. While it is difficult to pinpoint exactly the cause of this increase, it is easy to outline the consequences. It is no longer possible for a longline fisherman to earn a significant portion of his income from this once dynamic fishery. Regardless of how good the fishing is, 5½ days is not enough.

THE MORATORIUM: In February, 1982 at the Annual Meeting of the International Halibut Commission, 14 organizations representing halibut fishermen recommended that the North Pacific Fisheries Management Council implement a license moratorium. The Council approved such a moratorium but the federal regulatory process was unable to respond quickly enough to provide for implementation in time for the 1982 season. Again, at the request of the major organizations representing full time, professional longline fishermen, the Council proposed a moratorium, which has now been published in the Federal Register as a Notice of Proposed Rulemaking. Let us be clear that ALFA wholeheartedly endorses the implementation of this Proposed Rule as a Final Rule and we urge you to support the professional longline fishery in this effort.

The intended purposes of the moratorium are as follows:

- 1) Considering that the prospect of limited entry may cause even larger numbers of people with no previous participation or stake in the fishery to consider entering the fishery for the first time, solely in hope of gaining financially valuable fishing rights; the moratorium will prevent a sudden influx of new participants during the period while limited entry options are reviewed;
- 2) the moratorium would prevent a possibly unlimited increase in pressure on the resource as a result of speculation;
- 3) it will prevent the significant reductions in the average harvests and earnings of traditional participants that will result from speculative entry;

- 4) it will prevent additional and excessive investment in vessels and gear, much of which may have to be involuntarily retired in the establishment of an effective limited entry program;
- 5) and finally the moratorium will emphasize that any new participation and investment is undertaken at risk, since imposition of a limited entry system is under active consideration.

It is our experience that the great majority of those fishermen who are professional longliners and who continue to rely on longlining for the bulk of their livelihood, support the implementation of the moratorium. We believe the recent teleconference and "on site" hearings held by the Council will verify this conclusion.

LIMITED ENTRY/INDIVIDUAL QUOTAS: Currently, ALFA is not engaged in supporting the individual quota concept or any other concept for that matter. We can note that in a mail survey of our members 74% supported the individual quota concept. It is critical for the Committee and the Legislature as a whole to realize that this concept is only one of the many that have been studied in the future. Only last week, did the Council's contractor complete a Preliminary Draft study of individual quota, and this document is scheduled for another month of "in house" review before it is made public. Consequently, notwithstanding the language contained in HJR10 and CSSJR7, there is no share quota system being proposed, only a concept being explored. Unfortunately the vast majority of comments on the idea have been based on speculation about what this concept could mean. Briefly let us address some misconceptions about the concept embodied in HJR10 and CSSJR7.

1) Concentration of ownership in the hands of a few: Industry representatives supporting the idea have consistently demanded that an individual quota system provide for a limit on the number of shares an individual could accrue so as to preserve the socio-economic character of the fishery.

2) Encourage Speculation: On the contrary, supporters have insisted that holders of individual quotas be on board the vessel when it is fishing, just as in the current salmon limited entry system; reasonable "use or lose it" regulations are another method of preventing speculation by non-fishermen.

3) Concentration of ownership by non-residents: Again there is no greater chance that this phenomenon would occur in the individual quota system than in any other limited access system. In practice, this problem has been dealt with wisely and with success by the Legislature, and permits are migrating back to Alaska.

4) Eliminate Competition: On the contrary, an individual quota system would foster economic competition rather than the non-economic vessel to vessel, gear to gear competition that has, in the context of shortened seasons, increased over capitalization and economic inefficiency.

In any case, arguments in favor of or opposed to this system aside, the Council is not committed to limit entry in any form, much less the individual quota concept and this is made clear in the Notice of Proposed Rulemaking itself.

In conclusion, we recommend that: 1) the House Special Committee separate the issues of the moratorium and the individual quota system; 2) that the Committee draft a committee substitute in favor of the proposed moratorium; and 3) that the Committee spend a great deal more time exploring the ramifications of any limited entry concept before they comment publically in the form of a Resolution.

Thank you for the opportunity to comment on these issues.

Respectfully yours,

F. Gregory Baker
President/Marketing Manager

United Fishermen of Alaska
Testimony on HJR 10
2/24/85

Madam Chairman and members of the Special Committee on Fisheries:
Thank you for giving me the opportunity to comment on behalf of
the United Fishermen of Alaska.

The UFA is a statewide fishermen's organization with an annual membership of 1500 individual fishermen and 18 member organizations whose representatives sit on the UFA Board of Directors.

At its annual meeting last week, the UFA Board of Directors re-affirmed its earlier position of supporting and encouraging the imposition of a moratorium on the halibut fishery.

While there are valid arguments in opposition to the moratorium if one feels the halibut fishery is in a healthy biologic and economic condition, there are few words that can be said against it if one feels the fishery is over-crowded, the seasons too short and a biologic stress placed on the resource by too fast of harvest in too little time. The UFA feels that these problems do exist in the fishery and is therefore favoring a moratorium.

We feel the moratorium should be established for two primary reasons. First, so that persons who have not entered the fishery previously will not spend their time and financial resources gearing up for a fishery which is being considered for entry limitation.

This not only protects halibut fishermen presently in the fishery from further over-crowding and ever-shortening seasons, but also protects those who might enter this year only to be excluded later, when limited entry is in place. The second primary reason for imposing the moratorium is to prevent those with the financial resources to do so, to enter the fishery for speculation purposes, hoping to earn a permit that will one day be worth perhaps many more times its present day value.

It is the UFA's position that the problems exist now; and a solution needs to be enacted that will prevent the problems from growing worse, while a long-term solution is being found. As we have seen, limited entry of any sort is complex and controversial. A long-term solution may be several years in the making. Meanwhile, the moratorium will act to ensure a viable fishery still exists once the long-term solution is finally produced.

* * * * *

In addition, the UFA would like to appeal to you to separate the two distinctly different issues of the moratorium and the share-quota system. As now drafted, HJR 10 requires opposition to both concepts. The UFA would like to go on record as supporting the

HJR 10
Page three

moratorium and as neither supporting nor opposing the concept of share-quotas.

* * * * *

The UFA intends to take no position on a specific limited entry system at this time. The North Pacific Fishery Management Council is presently reviewing the study conducted on halibut limited entry and we will be monitoring their findings very closely.

Thank you again for your attention on this very important issue.

KODIAK FISH AND GAME ADVISORY COMMITTEE
P.O. BOX 686
KODIAK, ALASKA 99615

November 8, 1982

The Honorable Bob Mulcahy
P.O. Box 246
Kodiak, Alaska 99615

Dear Senator Mulcahy:

Attached is a resolution of the Kodiak Fish and Game Advisory Committee, passed unanimously at a regular meeting on October 26, 1982, to the Alaska Board of Fisheries. The resolution states the Kodiak Advisory Committee's opposition to the halibut shares system and moratorium to the State Board of Fisheries and requests the Board to take a similar stand on this issue. Copies of the resolution are being sent to Kodiak's State and Federal Representatives, other Advisory Committees in Alaska, the Halibut Commission, the North Pacific Fisheries Management Council, and NMFS, in order that all parties involved will be kept abreast of action taken by the Kodiak Fish and Game Advisory Committee.

Sincerely,

KODIAK FISH & GAME ADVISORY COMMITTEE



David Prokopowich
Secretary

Attachment

Opposition to "share-quota" system
and moratorium

KODIAK FISH AND GAME ADVISORY COMMITTEE

P.O. BOX 686

KODIAK, ALASKA 99615

RESOLUTION

A resolution of the Kodiak Fish and Game Advisory Committee opposing the halibut limited entry shares system and moratorium.

WHEREAS, fishing, fisheries resources and related industries are the only economic support of the City of Kodiak, local businesses, and its villages, and;

WHEREAS, the growth of the community, welfare of its residents and dependency of all related enterprises are dependent on an ever expanding effort to develop our fishery resources, and;

WHEREAS, the restriction, retardation, or exclusion of fishermen to develop resources that abound in the vicinity would have an adverse economic effect on the community as a whole, and;

WHEREAS, such restriction or exclusion would thereby affect opportunities to stabilize their incomes and the economy of Kodiak Island, and;

WHEREAS, halibut, specifically, is controlled and protected by quota imposed on the harvest and this system has proven effective over many years of practice, and;

WHEREAS, the evidence of increase in halibut stocks would bear out the success of the past application of quota conservation and thereby making a limited entry or share system unnecessary to the conservation of halibut stocks, and;

WHEREAS, the imposition of a share system would discourage individual expansion by local fishermen desiring to participate, and;

WHEREAS, the major, and conceivably only, beneficiaries of limited entry would be non resident Seattle based fishermen,

NOW THEREFORE BE IT RESOLVED, that the Kodiak Fish and Game Advisory Committee by resolution unanimously passed at regular session October 26, 1982 respectfully petition the Alaska State Board of Fisheries to adopt a position opposing a limited entry, moratorium or share system on halibut.

November 9, 1982

William Gordon, Director
National Marine Fisheries Service
3300 White Haven Street NW
Washington, D.C. 20235

Dear Mr. Gordon,

The Kodiak Halibut Fishermen's Association represents one hundred eleven halibut fishermen from the Kodiak Island area. The majority of our members are owner/operators of typical small to medium combination boats. Most of us do not rely solely on the halibut fishery, but depend on a variety of fisheries for economic survival.

We understand that the NOAA proposed rule imposing a moratorium on entry into the north Pacific halibut fishery is currently being reviewed by your staff. The Kodiak Halibut Fishermen's Association is unanimously and absolutely opposed to a moratorium in the north Pacific halibut fishery. We request the inclusion of our comments on this vital issue in the official proposed rule package being processed by NMFS/NOAA in Washington, D.C. at this time and also during the comment period after the rule has been listed in the Federal Register.

A moratorium excludes new people from entering the halibut fishery. This will hinder diversification by impairing flexibility to adapt to economic and resource fluctuation, which is important to the survival of the small businessman. According to the draft moratorium, one of the "undesirable effects" of the status quo is that those fishermen who have not chosen to diversify are not making a "significant" (undefined) part of their living from the halibut fishery alone. We believe that diversification is fundamental to a strong, healthy fishing business. Depending exclusively on one fishery resource for one's livelihood seems foolish, and yet a moratorium will protect and reward those without the foresight to diversify their fishing efforts.

A moratorium creates an exclusive, elite group of users of a common property natural resource. Competition in the halibut fishery will be limited to a select group of people. Fishermen should be allowed to continue to compete in a free market system instead of closing the door to new entrants.

We do not agree with the North Pacific Fisheries Management Council's rationale for implementing a moratorium in the halibut fishery. We believe the council's justifications and motivations for proposing and urging the adoption of a moratorium need close scrutinizing.

The north Pacific halibut fishery is not a threatened resource. The resource is managed effectively by a yearly quota. The International Pacific Halibut Commission has been steadily increasing the quota over the last four years. The CPUE (catch per unit effort) has also been going up according to recent IPHC annual reports. The issue is not a threatened resource, but rather how the resource is to be allocated among competitive fishermen.

A moratorium ~~and~~ subsequent limited ~~en~~ program will not necessarily increase the quality of the product. Fish in a frozen state can reach more consumers over a wider geographical range than the more lucrative fresh fish market. Fishermen in southcentral Alaska live too far from Seattle to take advantage of a fresh market without considerable expense. The quality of a "fresh" fish which has been on board two or three weeks before arriving at market is questionable, in any case.

The NPFMC offers no proof that fishing effort in short periods of time results in overharvesting. Two to three day openings throughout the spring, summer and fall would allow several different stocks of halibut to be utilized, benefiting IPHC research and fishermen who wish to longline some of the halibut before they die in crab pots during the September King Crab fishery in Kodiak.

The moratorium is a drastic measure by the NPFMC without consideration of alternative management plans such as gear limitations, exclusive registration areas, two day openings per month, vessel size limitations, and other methods of management practiced in Alaska by the Alaska Department of Fish & Game.

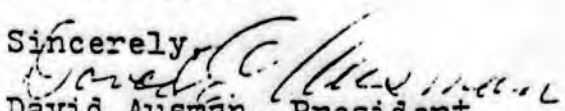
The NPFMC never held a public hearing on the current draft moratorium. We feel public hearings should be held in Kodiak, Seward, Homer, Petersburg, Cordova, Sitka, Ketchikan, Sand Point, and all other traditional fishing communities. Those people most affected are often the last to know. The NPFMC, our "local" sounding board for federal fisheries, has proved itself to be uncooperative, unsympathetic, and several times inconsiderate toward the feelings and concerns of Kodiak fishermen relating to the halibut moratorium. The lack of any public hearings on this particular moratorium is like another slap in the face for Kodiak and the other coastal communities of Alaska.

Because the proposed rule is not considered a "major rule", there are three important analyses that will not be prepared concerning the effects of a moratorium. A moratorium in the halibut fishery will have a "significant adverse effect on competition, employment, investment, productivity, and innovation". A moratorium will also have a "significant economic impact on small business". If a regulatory impact analysis and a regulatory flexibility analysis are prepared to study the effects of a moratorium we are certain that the results of these studies will support our notion that a moratorium is not necessary and actually could have a devastating effect on coastal economies in Alaska.

We strongly feel that not only are the above mentioned analyses required, in this case, but also an environmental impact statement should be prepared discussing the effects on the human environment in coastal Alaskan communities if a moratorium was imposed on the halibut fishery.

Please seriously consider our position on this very important issue when you and your staff examine the draft moratorium.

Sincerely,


David Ausman, President
Kodiak Halibut Fishermen's
Association

cc: Malcom Balridge
Secretary of Commerce

David Stockman
Director OMB

Dr, John Byrne
Administrator NOAA U.S. DOC

NPFMC
Chairman, Clem Tillion

Honorable Ted Stevens
U.S. Senate

Honorable Frank Murkowski
U.S. Senate

Honorable Donald Young
U.S. House of Representatives

Senator Bob Mulcahy
Alaska State Legislature

Representative Fred Zharoff
Alaska State Legislature

Honorable Jay S. Hammond
Governor of Alaska

Bill Sheffield
Governor = Elect of Alaska



KODIAK AREA NATIVE ASSOCIATION

Post Office Box 172 • Kodiak, Alaska 99615 • Phone (907) 486 • 5725

November 5, 1982

Mr. Clem Tillion, Chairman
North Pacific Fishery Management Council
P.O. Box 3136D
Anchorage, AK 99510

Dear Sir;

The Kodiak Area Native Association (KANA) is responding to the draft proposed rule that creates a moratorium on the entry of certain fishermen into the halibut fishery in the Northern Pacific Ocean. KANA has carefully reviewed the proposal and find it to be extremely detrimental to the Kodiak Area Alaskan Native villages economies.

Many long time village commercial fisherman were engaged in harvesting halibut prior to proposal's cut-off date of January 1, 1978. Due to the burgeoning salmon, King and Tanner Crab Fisheries and their conflicting seasons relating to the halibut season, most village fisherman opted not to participate in harvesting halibut. However, the problem with a decrease in King Crab resources and the softened price on Pink Salmon that have occurred this year have coerced the village fisherman to seek other viable fishery such as halibut to sustain their livelihood.

KANA has just completed a survey in the six (6) villages in the Kodiak Island Area to determine if an economic crisis exists due to the 1982 Pink Salmon season for Kodiak. Initial review of the survey's results indicate an economic disaster of measureable proportions. Halibut is an abundant resource near each of the villages despite the claims made on resource availability as stated in the proposal. The village commercial fisherman is able to diversify his fishing efforts to halibut with little capital and can effectively mitigate his fishing season income loss.

The moratorium as proposed will prohibit those fisherman from adequately addressing their financial needs. KANA is adamant on its belief that the moratorium will create significant adverse impact on village employment, investment, productivity, and, importantly, innovation in fishery diversity. KANA strongly urges that the NOAA Administration reclassify the moratorium as a "Major Rule" and further reclassify that the moratorium is, in fact, a major Federal action that will significantly affect the quality of human environment in the rural villages of the Kodiak Island Area.

In addition to limiting current village fishermen from engaging in the Halibut fisheries after January 1, 1978, the moratorium will prohibit fisherman from participation in the fishery after January 1, 1983. The limitations imposed by

Mr. Clem Tillior, Chairman

November 5, 1982

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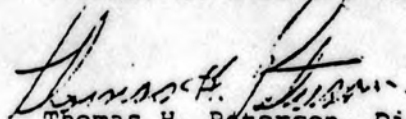
the draft proposal is estimated by KANA to severely compound the existing crisis occurring in the villages.

The KANA Board of Directors have addressed the Limited Share Quota System in a highly oppositional manner and have recently prepared a resolution to formally oppose the draft proposed moratorium. The resolution will follow shortly.

Please give our comments your sincerest consideration. KANA beseeches the Council, the National Marine Fisheries Service, and NOAA not to further burden the economic problems facing our villages with additional regulatory restrictions.

Sincerely,

KODIAK AREA NATIVE ASSOCIATION
DOLORES L. PADILLA, PRESIDENT



Thomas H. Peterson, Director
Community & Economic Development

THP:np

cc: Robert W. McVey, NMFS
William Gordon, NMFS
Dr. John Byrne, NOAA
Dave Ausman, KHFA
Barbara Monkiewicz, AOFS

TESTIMONY TO THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL
REGARDING
A MORATORIUM ON NEW ENTRIES INTO THE ALASKA HALIBUT FISHERY FOR 1983

R. David Herrnsteen
Mayor
Kodiak Island Borough

The Kodiak Island Borough encompasses the Kodiak Island group extending from the Barren Islands to the Trinity Islands and has a population of over 12,000 people. In 1981, and certain other previous years, the City of Kodiak ranked as the number one fishing port in the United States as measured by dock side value of fish landed. As our economy is dependent almost solely on fishing, we are concerned that our fish are properly managed biologically in our fisheries. In addition, as there is a natural turnover of participants in any fishery - some people get out - while new people get in. I am concerned that all our local residents have equal opportunity for present and future employment in our fisheries.

The Kodiak Island Borough's largest responsibility is education - the Assembly is responsible for building and funding the schools. We have an extensive program of fisheries education in our schools, including on-the-water experience for our high school students. I am concerned that our young people leaving school have a chance to find their niche in the fisheries, if they so desire. Some students try fishing halibut to help fund their college education - this moratorium would not allow new students to have this opportunity.

The Kodiak Island Borough includes six villages, five of which are second-class cities. Employment opportunities other than fishing are particularly few in the villages. There have recently been federal cutbacks in the various social and jobs programs. These villages have gone on record, through the Kodiak Area Native Association, as being opposed to the halibut moratorium. It's hard to have a resource in your front yard, watch others making good money, and not be able to have a crack at it. That's not fair and equitable.

Having lived in Alaska 22 years, and fished in Kodiak 17 years, I've seen where many times if a person gets quite comfortable financially, and particularly can make it in a short period of time, often they will tend to move Outside to a condo in Hawaii, a house in Seattle, or a farm in Missouri or Vermont (for example). That's their privilege, and I have no gripes if they are able to do it because they are good fishermen and can out-compete the others. But when they are able to do this because the government has restricted competition and allowed only a select few to profit from the increasing wealth of our fisheries, at the expense of employment opportunities of our local people, that's not equitable.

The workings of an economy are often very nebulous, it's hard to exactly describe on paper in dollars and cents, but it is still very real. Kodiak's economy over the past 15 years has been a slow, steady growth. After the king crab boom in the mid 60's, and the simultaneous reconstruction of Kodiak after the tidal wave of 1964 subsided, our economy had a pretty healthy growth. As the fisheries went up and down with the natural fluctuations of the fish stocks and fish prices, many fishermen moved back and forth among

fisheries. Those fishermen who stuck with one fishery benefited from the others having the ability to move out and into a more prosperous fishery.

In the late 60's and early 70's many halibut fishermen, particularly from Seattle, left the depressed halibut fishery and moved into the Alaska crab fishery. When the king crab fishery slumped in the early 70's many crabbers became combination boats and switched to the booming shrimp fishery; as shrimp declined in the late 70's many shrimpers switched to crab. And as salmon seasons have gone up and down over the years, many salmon fishermen switch back and forth among crab, shrimp and halibut to make a living.

Some areas of Alaska don't have as much continental shelf and aren't as blessed with the abundance of fisheries we have here, but we are generally an open town - people come here from Oregon, Washington, Southeast Alaska, Cook Inlet, and Westward Alaska to fish - some only seasonally, some move here. Some come only when they have a poor season at home. Usually we don't enjoy seeing the Outsiders who come and go, but it's been our freedom to move around and diversify that's been the secret of our success.

Certainly this system of mostly free entry has its problems. When you have a slump after a boom, it takes time for boats to move out of a fishery and into something else. And there are times when management of the fishery has to be more sophisticated and cautious. And it means the fisherman has to be cautious as a businessman at times. If he expands too heavily during a boom and isn't prepared for increased competition, or for a slump, he can feel a pinch. Or if he gets too high expectations during the "easy money" that occasionally accompanies a boom, he'll feel a shock when the reality of normal times hits. It's important for a fisherman to remember during a boom, or when he's "on a roll", that his earnings aren't normal or likely to continue that high.

If limited entry had been put on all our fisheries 10 or 12 years ago, I feel it would have been a disaster to the town as a whole - socially and economically. If we had locked everybody into their fisheries back when most crabbers fished just crab, and shrimpers just shrimp, etc. we would now probably have just a group of family dynasties harvesting our fish, and with many of them moving Outside. I think the town would have frozen or shrunk in size. You wouldn't have seen, every year, the new homes and steady expansion. It would have been feast or famine for many fishermen.

The price of halibut climbed from \$.18 in 1967 to as high as \$2 a pound, shrimp went from \$.04 to \$.28, king crab went from \$.10 to \$4.30, tanner crab went from \$.10 to \$1.80. Even though the quotas and harvests have fluctuated greatly, the overall seafood harvest values have climbed to a record \$130 million value to fishermen in 1981 in Kodiak. Instead of new people, new jobs, new blood and enthusiasm, you would have had a static or even declining number of men. It's very possible that the capital costs would be just as high because of write-offs, just fewer people dividing the pie. It's very possible that except within the family, crew jobs would have become salaried under some of the limited entry schemes.

Now I'm not eager to see how many people we can bring to Kodiak or Alaska, but we do need jobs for our young people. Many of our businesses and people's dreams are dependent on some growth. What concerns me most is that we have some fairness and equity in the allocation of the wealth of our fisheries.

Drive through our high school parking lot and see how many brand new 4-wheel drive pickups you see. Last summer was a slow season, so the number may be down a little. Some kids are able to afford them because they might fish with their dad who may be an exceptional fisherman. But if limited entry had been put on all fisheries 12 years ago, many kids would have those trucks solely because their dad happened to have received one of those lucky permits 12 years ago. We would have developed a privileged class, an elitest society that was determined by the roll of the dice - who was fishing when limited entry was imposed. I don't think that's healthy for society, or what Alaska and fishing is all about.

My own personal case is typical. In 1967 they closed the Kodiak salmon season for almost the entire summer, so I spent four months on a halibut schooner. For the next four years I continued to make halibut trips along with fishing on crab, shrimp and salmon boats. Halibut prices were down (as low as \$.17/lb.) and stocks were slumping (we fished 26 days on a highline schooner for 30,000 pounds in 1971 - my crew share was \$90 for the month). I crewed for eight years with many highliners in all four fisheries so that when I got my own boat I could be diversified.

In 1974 my wife and I made the big jump and bought our own 42 foot boat. For two years we fished entirely shrimp, then we branched into crab. In 1978 we sold our first boat and bought a slightly larger boat. When shrimp declined we tendered salmon along with crab fishing. Last year because of the salmon price slump we did not tender, so fished just crab - including dungeness.

Even though I haven't fished shrimp since June of 1978, I am still a shrimp fisherman and dependent on the shrimp resource to make my living. Even though I haven't fished halibut since July 1971 and then only as a crewman, I am still a halibut fisherman, and consider myself dependent on the halibut fishery. I've spent more hours at the roller, gaffed more halibut and baited more hooks than a large number of the fishermen who could qualify to fish under the proposed moratorium the next three years. I have a vessel and a reel that are suited for halibut. All of the skills I've developed as a skipper in finding crab and shrimp and running my business are applicable to finding halibut. The halibut, cod and pollock stocks are in an upward cycle, and are also preying heavily on crab and shrimp stocks. I am dependent upon my ability to move my business along with nature's cycles in order to make a living. The guidelines of the proposed moratorium are arbitrary and capricious. To exclude me because I never fished halibut since January 1, 1978 is not fair and equitable.

The Council needs to look at fisheries as a group and over time, taking into consideration dynamic environmental and market conditions. It is natural and healthy economically that as the halibut stocks and markets started booming in the late 70's, that participation increased. The same boats I crewed on in the early 70's, averaging a crew share of maybe \$1500 for a three week trip, by the late 70's were crewsharing \$1000 a day and better - \$60,000 man-shares in much shorter seasons. Instead of working off-season winter jobs, as many men did in the earlier years, many were able to lay back in the winters. There is nothing wrong with making big money- that's the thrill of fishing - that's the

dream that keeps you going. It's only wrong when you feel you deserve big money all the time, and need to exclude others in order to achieve it.

Obviously the Council's own actions have been a very large impetus in the increased fleet. Ever since 1978, the Council has been setting "cut-off dates for eligibility" for halibut limited entry - setting up work groups, funding studies, etc. All of these actions have helped create the often frantic rush to fish halibut, even if at a loss. If this moratorium should be approved, it will be a major government policy and will create a new rush to participate in all fisheries not under a limited entry system. The State of Alaska's enthusiasm for extending limited entry beyond salmon and herring definitely cooled in the late 70's and many Kodiak fishermen once again started making their decisions on when and what to fish, purely on business and personal reasons. A new government policy like a halibut moratorium would have a very major effect on participation in the other fisheries. It would start another frantic rush, would increase our costs by forcing us to participate unprofitably in certain fisheries so we could qualify for future permits. In addition, it would decrease our individual earnings because of the added participation. All these negative reactions would be very real and are not just imaginary. It would be an extremely unwise action for our industry. You cannot act on the halibut fishery without affecting the rest of the industry. The harvesting sections of our industry are just as interrelated as the fish in the ocean.

It is very likely that if future limited entry would be put to rest and the halibut moratorium be turned down, there would be less participation in the halibut fishery than if the moratorium would be enacted. A three year moratorium would bring people out of the woodwork who had already dropped out of the fishery, just so they could increase their qualifications for future permits, and wisely so. The Council has been saying periodically since 1978 that "next year's" participation won't count. So why should the Council be believed now if the Council should say participation during the next three years won't count. More than twice as many people (6,481 individuals) will be eligible to fish under the proposed moratorium than ever fished in any one year (2,800), and it seems certain that a large number of those who dropped out will re-enter the fishery, largely in the hopes of financial gain from ownership of a future share or permit. In addition, many of those who fished the past year or two, but were not financially successful and were considering quitting, will have a renewed incentive to remain active in the fishery during the moratorium.

A moratorium has such a nice allure to it. You kick out the fewest and postpone the disagreements about the various limited entry systems. However, during the enactment of Alaska's limited entry law (and ever since) government lawyers have told us that a moratorium is the most unconstitutional of all limited entry alternatives because it creates such a closed class without a means of entry. The halibut resource is in the best shape its been in decades and I believe there is no way you can justify "protection of the resource" as reason for a moratorium.

Certainly the moratorium will appeal to the fear all fishermen have of competition. It appeals to the greed in us. For the hobby or vacation halibut fisherman who has regular year-round shore-based jobs its real nice. But watch out - how can they be considered dependent on the fishery. For the successful fisherman who has fished mainly or solely halibut and had a taste of the big season, he thinks he'll be eliminating future competition.

The halibut commission has been telling fishermen for over a year that without limited entry they will lose halibut as a fishery. The commission can't justify its own existence if the season is too short, they say. Hogwash! The biologists just need to be used in the other fisheries, also if they have slack time. It seems to me that the halibut commission has a unique bureaucratic position in being separate from both ADF&G and NMFS, a situation which needs review.

Certainly the fishing industry has troubled times. I haven't been so concerned for a long time as to where I'll make it next season. But putting boxes around each fishery and each boat isn't the answer, There are no guarantees in fishing, and if someone wants one he's in the wrong business.

 Jan 21, 1983
R. David Herrnsteen Date
Mayor
Kodiak Island Borough



May 5, 1982

The Honorable Bob Mulcahy
Alaska State Senator
Pouch V (Mail Stop 3100)
Juneau, Alaska 99811

Dear Senator Mulcahy:

Please find enclosed a copy of Resolution 19-82 from the City of Kodiak, Alaska, which opposes the share-quota system of allocation of fisheries resources. This resolution passed unanimously, and we would respectfully request that you review its contents and take into consideration the City Council's desires.

Sincerely yours,

CITY OF KODIAK

WILLIAM C. BIVIN
City Manager

WCB:cdh

Enclosure

Opposition to "share-quota" system
only

CITY OF KODIAK
RESOLUTION 19-82

A RESOLUTION OF THE COUNCIL OF THE CITY OF KODIAK, ALASKA, OPPOSING THE SHARE-QUOTA SYSTEM OF ALLOCATION OF FISHERIES RESOURCES.

WHEREAS, the North Pacific Fishery Management Council (NPFMC) on March 25, 1982, suggested that a moratorium be imposed immediately on new entrants to the Alaska halibut fishery, and recommended that a share-quota system of allocation of the fishery be prepared for the 1983 season; and

WHEREAS, the United States Senate recently passed SB 2244 giving the Council the necessary authority to enact such a system; and

WHEREAS, the bill is expected to pass the United States House of Representatives without any public hearings; and

WHEREAS, the proposed share system will allocate permanent fishing shares consisting of a fixed percentage of the halibut resource to individual fishermen based on a yet to be determined formula; and

WHEREAS, it is intended that these shares may thereafter be bought or sold by the initial shareholders, and that individual shareholders may purchase additional shares from willing sellers up to an aggregate of two percent of the total quota; and

WHEREAS, it appears inevitable that these shares will concentrate to fewer and fewer people, theoretically as few as 50 if two percent is used as the maximum percentage allowed per person; and

WHEREAS, the annual value of the halibut harvest in Alaska approaches \$50,000,000 to the fishermen; and

WHEREAS, it has been conservatively estimated that the value of halibut shares could be three to five times the value of their annual allowed catch, creating a windfall to the initial shareholders, and an even greater burden to future potential shareholders; and

WHEREAS, this halibut share-quota system could be used as a precedent and prototype for other Alaskan fisheries by state and federal fishery managers; and

WHEREAS, under the shares system a fisherman's catch will be dependent solely on the number of shares he owns rather than on his abilities and competitiveness as a fisherman; and

Opposition to "Share-quota" system
only

WHEREAS, such a system may concentrate the increasing wealth of our fisheries into fewer and fewer hands, creating great inequities of opportunity in our fishing communities; and

WHEREAS, the share system greatly hinders fishermen from the benefits of being able to diversify and compete among various fisheries, thus depriving them... of a key element for success; and

WHEREAS, Alaska fishery managers already have an adequate variety of regulatory tools, such as harvest levels, sex and size limits, gear restrictions, area closures, et cetera; and

WHEREAS, the fishing industry is too vital to the people and economy of Kodiak and Alaska to risk all the inherent dangers and inequities of a share-quota system of allocation of fishery resources; and

WHEREAS, the City of Kodiak considers the rich, abundant fisheries resources in the waters surrounding Kodiak Island and Alaska to be a renewable public resource which serves to sustain a necessary part of the livelihoods and economy of the people and communities of our island and our state; and

WHEREAS, the idea of permanently turning over the ownership of our public resource through a share-quota method of allocation is contrary to the nature of our fishing industry.

NOW, THEREFORE, BE IT RESOLVED that the City of Kodiak is opposed to the / share-quota system of allocation of fisheries resources in Alaska; and /

FURTHER, BE IT RESOLVED that this resolution be communicated to the following people:

The President, Ronald Reagan
The Honorable Jay S. Hammond, Governor of Alaska
The Honorable Terry Miller, Lieutenant Governor of Alaska
The Honorable Ted Stevens, U. S. Senate
The Honorable Frank H. Murkowski, U. S. Senate
The Honorable Edward M. Kennedy, U. S. Senate
The Honorable Don Young, U. S. House of Representatives
The Honorable John B. Breaux, U. S. House of Representatives
The Honorable Gerry E. Studds, U. S. House of Representatives
U. S. Department of Commerce, Malcolm Baldrige, Secretary
International Pacific Halibut Commission
National Oceanic and Atmospheric Administration

North Pacific Fishery Management Council, Clem Tilliam, Chairman

National Marine Fisheries Service

Alaska Legislature, Senators and Representatives

Messrs. H. A. Boucher
Steve Cowper
Tom Fink
Bruce J. Lemke
Rick Reakoff
Bill Sheffield
Edward J. Vincent
Stephen McAlpine

All Alaska Cities

PASSED AND APPROVED this 3rd day of MAY, 1982.

CITY OF KODIAK

Alan J. Beasley
MAYOR

ATTEST:

AB
ACTING CITY CLERK

CITY OF AKUTAN

P.O. Box 557
Dutch Harbor, Ak. 99682
Phone (907) 698-2207

AKUTAN

Jacob Stepanin, Mayor
Zuma Borenin
George McGlashan
Helen Prosnicki
Leon Prosnicki
Jennie Robinson
Chris. Tchernyshoff, Vice Mayor
Anna McGlashan, City Clerk

Anchorage Office
308 G Street, Suite 317
Anchorage, Ak. 99501
Phone: (907) 279-9245

City Administrators
Frances Rose
Nancy Gross

RESOLUTION NO. 82-17

A RESOLUTION OPPOSING THE SHARE-QUOTA SYSTEM OF ALLOCATION OF FISHERIES RESOURCES. *- 7 1*

WHEREAS, many of the people of Akutan earn their livelihood in the fishing industry; and,

WHEREAS, a significant part of that industry is the halibut catch; and,

WHEREAS, fishing pressure on that species is increasing as the entry of other fisheries has been limited by governmental action; and,

WHEREAS, the North Pacific Fisheries Management has recommended that a share-quota system of allocation of that fishery be prepared for the 1983 season; and,

WHEREAS, the City Council of Akutan is convinced that such an allocation will work significant hardship to the smaller boats and may even eliminate resident fishermen from the fishery;

NOW, THEREFORE, BE IT RESOLVED that the Akutan City Council opposes the share-quota system of allocating the halibut resource based on past volume of fish caught, and further BE IT RESOLVED that this resolution be communicated to the following people:

The President, Ronald Reagan
The Honorable Jay S. Hammond, Governor of Alaska
The Honorable Terry Miller, Lieutenant Governor of Alaska
The Honorable Ted Stevens, U. S. Senate
The Honorable Frank H. Murkowski, U. S. Senate
The Honorable Edward M. Kennedy, U. S. Senate
The Honorable Don Young, U. S. House of Representatives
The Honorable John B. Breaux, U. S. House of Representatives
The Honorable Gerry E. Studds, U. S. House of Representatives

U. S. Department of Commerce, Malcolm Baldrige, Secretary
International Pacific Halibut Commission
National Oceanic and Atmospheric Administration
North Pacific Fishery Management Council, Clem Tillion, Chairman
National Marine Fisheries Service
Alaska Legislature, Senators and Representatives

Jacob Stepan
Mayor

ATTEST:

A. J. M. C. C.
City Clerk

DATE: July 7, 82

CITY OF KING COVE
RESOLUTION NO. 82-13

A RESOLUTION OF THE COUNCIL OF THE CITY OF KING COVE OPPOSING
THE SHARE-QUOTA SYSTEM OF ALLOCATION OF FISHERIES RESOURCES.

WHEREAS, the North Pacific Fishery Management Council (NPFMC) on March 25, 1982, suggested that a moratorium be imposed immediately on new entrants to the Alaska halibut fishery, and recommended that a share-quota system of allocation of the fishery be prepared for the 1983 season; and

WHEREAS, the United States Senate recently passed SB 2244 giving the Council the necessary authority to enact such a system; and

WHEREAS, the bill is expected to pass the United States House of Representatives without any public hearings; and

WHEREAS, the proposed share system will allocate permanent fishing shares consisting of a fixed percentage of the halibut resource to individual fishermen based on a yet to be determined formula; and

WHEREAS, it is intended that these shares may thereafter be bought or sold by the initial shareholders, and that individual shareholders may purchase additional shares from willing sellers up to an aggregate of two percent of the total quota; and

WHEREAS, it appears inevitable that these shares will concentrate to fewer and fewer people, theoretically as few as 50 if two percent is used as the maximum percentage allowed per person; and

WHEREAS, the annual value of the halibut harvest in Alaska approaches \$50,000,000 to the fishermen; and

WHEREAS, it has been conservatively estimated that the value of halibut shares could be three to five times the value of their annual allowed catch, creating a windfall to the initial shareholders, and an even greater burden to future potential shareholders; and

WHEREAS, this halibut share-quota system could be used as a precedent and prototype for other Alaskan fisheries by state and federal fishery managers; and

WHEREAS, under the shares system a fisherman's catch will be dependent solely on the number of shares he owns rather than on his abilities and competitiveness as a fisherman; and

WHEREAS, such a system may concentrate the increasing wealth of our fisheries into fewer and fewer hands, creating great inequities of opportunity in our fishing communities; and

WHEREAS, the share system greatly hinders fishermen from the benefits of being able to diversify and compete among various fisheries, thus depriving them of a key element for success; and

WHEREAS, Alaska fishery managers already have an adequate variety of regulatory tools, such as harvest levels, sex and size limits, gear restrictions, area closures, et cetera; and

WHEREAS, the fishing industry is too vital to the people and economy of King Cove and Alaska to risk all the inherent dangers and inequities of a share-quota system of allocation of fishery resources; and

WHEREAS, the City of King Cove considers the rich, abundant fisheries resources in the waters surrounding King Cove and Alaska to be renewable public resource which serves to sustain a necessary part of the livelihoods and economy of the people and communities of our state; and

WHEREAS, the idea of permanently turning over the ownership of our public resource through a share-quota method of allocation is contrary to the nature of our fishing industry.

~~NOW, THEREFORE, BE IT RESOLVED that the City of King Cove is opposed to the share-quota system of allocation of fisheries resources in Alaska; and~~

FURTHER, BE IT RESOLVED that this resolution be communicated to the following people:

The Honorable Jay S. Hammond, Governor of Alaska

The Honorable Ted Stevens, U.S. Senate

The Honorable Frank H. Murkowski, U.S. Senate

The Honorable Don Young, U.S. House of Representatives

NPFMD, Chairman, Clem Tillion

The Honorable Bob Mulcahy, Alaska State Senate

The Honorable Eric Sutcliffe, Alaska House of Representatives

PASSED AND APPROVED this 20 day of May, 1982.

Carl H. Black
MAYOR Pro Tem

Attest:

Barbara S. Cunningham
CITY CLERK

RESOLUTION NO. 82-38-R

A RESOLUTION OF THE KODIAK ISLAND BOROUGH ASSEMBLY OPPOSING THE SHARE-QUOTA SYSTEM OF ALLOCATION OF FISHERIES RESOURCES.

WHEREAS, the North Pacific Fishery Management Council on March 25, 1982 enacted a moratorium on new entrants to the Alaska halibut fishery, and directed that a shares-quota system of allocation of the fishery be prepared for the 1983 season, and

WHEREAS, the United States Senate recently passed S. 2244 giving the Council the necessary authority to enact such a system, and

WHEREAS, the bill is expected to pass the U. S. House of Representatives without any public hearings, and

WHEREAS, the proposed share system will allocate permanent fishing shares consisting of a fixed percentage of the halibut to individual fishermen based on their average harvests of the past three years as a percent of the total harvest, and

WHEREAS, it is intended that these shares may thereafter be bought, sold or leased by the initial shareholders, and that individual shareholders may purchase additional shares from willing sellers up to an aggregate of two percent, or possibly higher, of the total quota per shareholder,

WHEREAS, it appears inevitable that these shares will concentrate to fewer and fewer people, theoretically as few as 50 if two percent is the maximum allowed per person, and

WHEREAS, the annual value of the halibut harvest in Alaska approaches \$50,000,000 to the fishermen, and

WHEREAS, it has been conservatively estimated that the value of halibut shares could be three to five times the value of their annual allowed catch, or about \$250,000,000, creating an undeserved windfall to the initial shareholders, and an even greater burden to future potential shareholders, and

WHEREAS, this halibut share-quota system is being used as a precedent and prototype for other Alaskan fisheries by state and federal fishery managers, and

WHEREAS, under the shares system a fisherman's catch will be dependent solely on the number of shares he owns (his wealth) rather than on his abilities as a fisherman, and

WHEREAS, such a system will concentrate the increasing wealth of our fisheries into fewer and fewer hands, creating great inequities of opportunity in our fishing communities, particularly among the young, and

WHEREAS, the share system greatly hinders fishermen from being able to diversify among various fisheries, thus depriving them of a key element for success, and

WHEREAS, Alaska fishery managers already have an adequate variety of regulatory tools such as harvest levels, sex and size limits, gear restrictions, area closures, et cetera and our fisheries are generally very healthy biologically, and

WHEREAS, the fishing industry is too vital to the people and economy of Kodiak and Alaska to risk all the inherent dangers and inequities of such an irreversible, unnecessary management plan as the shares system, and

WHEREAS, the Kodiak Island Borough considers the rich, abundant fisheries resources in the waters surrounding Kodiak Island and Alaska to be a renewable PUBLIC resource which serves a primary purpose, along with helping feed people around the world, of sustaining the livelihoods and economy of the people and communities of our island and state, and

WHEREAS, the idea of permanently turning over the ownership of our public resource to a few private hands is repugnant to the fishing industry and people of Kodiak.

~~NOW, THEREFORE, BE IT RESOLVED that the Kodiak Island Borough~~
~~opposed to the share-quota system of allocation of any fisheries resources in~~
~~Alaska, and that this resolution be communicated to the following people:~~

The President
Ronald Reagan

The Honorable Jay S. Hammond
Governor of Alaska

The Honorable Ted Stevens
United States Senate

The Honorable Frank H. Murkowski
United States Senate

The Honorable Edward M. Kennedy
United States Senate

The Honorable Don Young
The United States House of Representatives

The Honorable John B. Breaux
The United States House of Representatives

The Honorable Gerry E. Studds
The United States House of Representatives

NPFMD, Chairman, Clem Tillion

Alaska Legislature

Messrs. H. A. Boucher, Steve Cowper, Tom Fink, Oral E. Freeman,
Bruce J. Lemke, Terry Miller, Rick Reakoff, Bill Sheffield, Edward J.
Vincent, Brad Bradley, Mike Colletta, Stephen McAlpine Charles H.
Parr, Terry Stimson

All Alaska Cities

PASSED AND APPROVED this 30th day of April, 1964 by
the Borough Assemb

KODIAK ISLAND BOROUGH

By R. David Herrnsteen
Borough Mayor R. David Herrnsteen

ATTEST:

By Stella Miller, CMC
Borough Clerk

Ayes 7 Nays 0

Introduced by: Mayor
e: June 15 1982
s: 13 Yes, 1 No
Action: Adopted

KENAI PENINSULA BOROUGH

RESOLUTION 82-108

OPPOSING THE PROPOSED SHARE-QUOTA SYSTEM OF ALLOCATION OF FISHERIES RESOURCES, AND IN PARTICULAR, THE PROPOSED HALIBUT SHARE-QUOTA SYSTEM.

WHEREAS, the North Pacific Fishery Management Council on March 25, 1982 suggested that a moratorium be imposed immediately on new entrants to the Alaska halibut fishery, and recommended that a share-quota system of allocation of the fishery be prepared for the 1983 season; and

WHEREAS, the proposed share system will allocate permanent fishing shares consisting of a fixed percentage of the halibut resource to individual fishermen based on a yet to be determined formula, but it has been suggested to limit the halibut taking to only those fishermen who engaged in the halibut fishery the past three years and to allow them only their average take of the past three years; and

WHEREAS, it appears inevitable that these share will concentrate to fewer and fewer people, theoretically as few as 50 if two percent is used as the maximum percentage allowed per person; and

WHEREAS, this halibut share-quota system could be used as a precedent and prototype for other Alaskan fisheries by state and federal fishery managers and such a system may concentrate the increasing wealth of our fisheries into fewer and fewer hands, creating great inequities of opportunity in our fishing communities; and

WHEREAS, Alaska fishery managers already have an adequate variety of regulatory tools, such as harvest levels, sex and size limits, gear restrictions, area closures, et cetera; and

WHEREAS, the idea of permanently turning over the ownership of our public resource through a share-quota method of allocation is contrary to the nature of our fishing industry;

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

~~Section 1. That the Borough is opposed to the share-quota system of allocation of fisheries resources in Alaska, and particularly the proposed halibut share-quota system.~~

Section 2. That the Clerk shall serve copies of this resolution upon The President, Ronald Reagan, upon The Honorable Jay S. Hammond, Governor of Alaska, upon The Honorable Terry Miller, Lieutenant Governor of Alaska, upon The Honorables Ted Stevens, Frank H. Murkowski and Edward M. Kennedy, U.S. Senators, upon The Honorables Don Young, John B. Breaux and Gerry E. Studds, U.S. Representatives, upon Malcolm Baldrige, Secretary U.S. Department of Commerce, upon the International Pacific Halibut Commission, the National Oceanic & Atmospheric Administration, North Pacific Fishery Management Council, Clem Tillion, Chairman National Marine Fisheries Service, Alaska Legislature, Senators & Representatives and upon all Alaska cities and boroughs.

Section 3. That this resolution takes effect immediately upon its adoption.

ADOPTED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH ON THIS 15 DAY OF June, 1982.


John C. Davis, Assembly President

ATTEST:


Borough Clerk



CITY OF KENAI
"Oil Capital of Alaska"

P. O. BOX 580 KENAI, ALASKA 99611
TELEPHONE 283 - 7535

May 25, 1982

The President
The White House
Washington, D.C. 20500

Dear President Reagan:

Please find enclosed a copy of Resolution 19-82 from the City of Kodiak, Alaska, which opposes the share quota system of allocation of fisheries resources.

This resolution has also been considered by the City Council of Kenai, Alaska at its regular meeting of May 19, 1982. The City Council unanimously agreed with the resolution from the City of Kodiak. The Kenai City Council has directed me, as City Manager, to communicate their actions on this resolution to you and respectfully asks you to oppose the share quota system of allocation of fisheries resources in Alaska.

Sincerely,

Wm. J. Brighton
City Manager

WJB/dc
Enclosure

WHEREAS, such a system may concentrate the increasing wealth of our fisheries into fewer and fewer hands, creating great inequities of opportunity in our fishing communities; and

WHEREAS, the share system greatly hinders fishermen from the benefits of being able to diversify and compete among various fisheries, thus depriving them of a key element for success; and

WHEREAS, Alaska fishery managers already have an adequate variety of regulatory tools, such as harvest levels, sex and size limits, gear restrictions, area closures, et cetera; and

WHEREAS, the fishing industry is too vital to the people and economy of Kodiak and Alaska to risk all the inherent dangers and inequities of a share-quota system of allocation of fishery resources; and

WHEREAS, the City of Kodiak considers the rich, abundant fisheries resources in the waters surrounding Kodiak Island and Alaska to be a renewable public resource which serves to sustain a necessary part of the livelihoods and economy of the people and communities of our island and our state; and

WHEREAS, the idea of permanently turning over the ownership of our public resource through a share-quota method of allocation is contrary to the nature of our fishing industry.

NOW, THEREFORE, BE IT RESOLVED that the City of Kodiak is opposed to the share-quota system of allocation of fisheries resources in Alaska; and

FURTHER, BE IT RESOLVED that this resolution be communicated to the following people:

The President, Ronald Reagan

The Honorable Jay S. Hammond, Governor of Alaska

The Honorable Terry Miller, Lieutenant Governor of Alaska

The Honorable Ted Stevens, U. S. Senate

The Honorable Frank H. Murkowski, U. S. Senate

The Honorable Edward M. Kennedy, U. S. Senate

The Honorable Don Young, U. S. House of Representatives

The Honorable John B. Breaux, U. S. House of Representatives

The Honorable Gerry E. Studds, U. S. House of Representatives

U. S. Department of Commerce, Malcolm Baldrige, Secretary

International Pacific Halibut Commission

National Oceanic and Atmospheric Administration

North Pacific Fishery Management Council, Clem Tillion, Chairman

National Marine Fisheries Service

Alaska Legislature, Senators and Representatives

Messrs. H. A. Boucher
Steve Cowper
Tom Fink
Bruce J. Lemke
Rick Reakoff
Bill Sheffield
Edward J. Vincent
Stephen McAlpine

All Alaska Cities

PASSED AND APPROVED this 3rd day of May, 1962.

CITY OF KODIAK

Alan J. Beardsley
MAYOR

ATTEST:

W. Brown
ACTING CITY CLERK

City of Soldotna
BOX 409 PHONE 262-9107
SOLDOTNA, ALASKA 99669



October 28, 1982

David Shrader, Co-Chairman
A.O.F.S.
Pouch 490
Kodiak, AK 99615

Dear Mr. Shrader:

Thank you for the letter from Alaskans Opposed to Fishery Shares.

An entire packet of material was submitted to the Soldotna City Council. The Council did not wish to pass a resolution but agreed to the concept as presented in the resolutions from other cities and boroughs. Letters to this effect have been sent to those concerned.

Sincerely,

A handwritten signature in cursive script, which appears to read "Justin G. Maile", is written below the word "Sincerely,".

Justin G. Maile
Mayor

JGM:mg



KETCHIKAN GATEWAY BOROUGH

344 FRONT STREET
KETCHIKAN, ALASKA 99901

September 15, 1982

Mr. David Shrader, Chairman
Alaskans Opposed to Fishery Shares
Pouch 490
Kodiak, Alaska 99615

Dear Mr. Shrader:

Your letter and attachments of August 25, 1982 requesting Assembly action in support of your group's opposition to the "share-quota" form of management for fisheries particularly the halibut fishery was presented to the Ketchikan Gateway Borough Assembly at its regular meeting of September 7, 1982.

The following motion was adopted: "to support the Alaskans Opposed to Fishery Shares objection to the share-quota system of management in any fishery." Those members who supported the motion felt that it was entirely appropriate to support such a request because Ketchikan is a fishing community. However, those members who did not support the motion were concerned about a lack of information from the North Pacific Fishery Management Council.

It would appear that if your group desires stronger support from the Ketchikan Gateway Borough Assembly, substantial research into the program would have to be done in order to present both sides of the issue. The Assembly did not request this research, and therefore, no further action is anticipated.

Sincerely,

KETCHIKAN GATEWAY BOROUGH

Georgianna Booth
Georgianna Booth, Clerk

KODIAK AREA CHAMBER OF COMMERCE

RESOLUTION 02-582

A RESOLUTION OF THE KODIAK AREA CHAMBER OF COMMERCE
OPPOSING THE SHARE QUOTA SYSTEM OF ALLOCATION OF FISHERIES RESOURCES.

WHEREAS, the North Pacific Fishery Management Council on March 25, 1982, enacted a moratorium on new entrants to the Alaska halibut fishery, and directed that a shares-quota system of allocation of the fishery be prepared for the 1983 season, and

WHEREAS, the United States Senate recently passed SB 2244 giving the Council the necessary authority to enact such a system, and

WHEREAS, the bill is expected to pass the U. S. House of Representatives without any public hearings, and

WHEREAS, the proposed share system will allocate permanent fishing shares consisting of a fixed percentage of the halibut to individual fishermen based on their average harvests of the past three years as a percent of the total harvest, and

WHEREAS, it is intended that these shares may thereafter be bought, sold, or leased by the initial shareholders, and that individual shareholders may purchase additional shares from willing sellers up to an aggregate of two percent or possibly higher, of the total quota per shareholder, and

WHEREAS, it appears inevitable that these shares will concentrate to fewer and fewer people, theoretically as few as 50, if two percent is the maximum allowed per person, and

WHEREAS, the annual value of the halibut harvest in Alaska approaches \$50,000,000 to the fishermen, and

WHEREAS, it has been conservatively estimated that the value of the halibut shares could be three to five times the value of their annual allowed catch, or approximately \$250,000,000, creating an undeserved windfall to the initial shareholders, and an even greater burden to future potential shareholders, and

WHEREAS, ...IS HALIBUT SHARE QUOTA SYSTEM BEING USED
AS A PRECEDENT AND PROTOTYPE FOR OTHER ALASKAN FISHERIES BY STATE AND
FEDERAL FISHERY MANAGERS, and

WHEREAS, under the shares system a fisherman's catch will
be dependent solely on the number of shares he owns (his wealth)
rather than his abilities as a fisherman, and

WHEREAS, such a system will concentrate the increasing
wealth of our fisheries into fewer and fewer hands, creating great
inequities of opportunity in our fishing communities particularly a-
mong the young, and

WHEREAS, Alaska fishery managers presently have a variety
of regulatory tools, such as harvest levels, sex and size limits,
gear restrictions, area closures, et cetera, and our fisheries and
generally very healthy biologically, and

WHEREAS, the share system greatly hinders fishermen from
being able to diversify among various fisheries, thus depriving them
of a key element for economic survival as small businessmen, and

WHEREAS, the Alaska fisheries industry is the first, or
close second, largest private sector employer in the State, and as
such, too vital to the people and the economy to risk all the in-
herent dangers and inequities of such an irreversible, unnecessary
management plan as the shares system, and

WHEREAS, the entire economy of Alaskan coastal communities
such as Kodiak is small businesses dependently interfacing with the
fisheries industry and providing economic and logistic support to the
independent fishermen, and

WHEREAS, the Kodiak Area Chamber of Commerce considers
the rich abundant fisheries resources in the waters surrounding Kodiak
and Alaska to be a renewable PUBLIC resource which serves a primary
purpose, along with providing food for the people of the world, of
sustaining the livelihoods and economy of the people and communities
of our island and State, and

WHEREAS, ...IS HALIBUT SHARE QUOTA SYSTEM BEING USED
AS A PRECEDENT AND PROTOTYPE FOR OTHER ALASKAN FISHERIES BY STATE AND
FEDERAL FISHERY MANAGERS, and

WHEREAS, under the shares system a fisherman's catch will
be dependent solely on the number of shares he owns (his wealth)
rather than his abilities as a fisherman, and

WHEREAS, such a system will concentrate the increasing
wealth of our fisheries into fewer and fewer hands, creating great
inequities of opportunity in our fishing communities particularly a-
mong the young, and

WHEREAS, Alaska fishery managers presently have a variety
of regulatory tools, such as harvest levels, sex and size limits,
gear restrictions, area closures, et cetera, and our fisheries and
generally very healthy biologically, and

WHEREAS, the share system greatly hinders fishermen from
being able to diversify among various fisheries, thus depriving them
of a key element for economic survival as small businessmen, and

WHEREAS, the Alaska fisheries industry is the first, or
close second, largest private sector employer in the State, and as
such, too vital to the people and the economy to risk all the in-
herent dangers and inequities of such an irreversible, unnecessary
management plan as the shares system, and

WHEREAS, the entire economy of Alaskan coastal communities
such as Kodiak is small businesses dependently interfacing with the
fisheries industry and providing economic and logistic support to the
independent fishermen, and

WHEREAS, the Kodiak Area Chamber of Commerce considers
the rich abundant fisheries resources in the waters surrounding Kodiak
and Alaska to be a renewable PUBLIC resource which serves a primary
purpose, along with providing food for the people of the world, of
sustaining the livelihoods and economy of the people and communities
of our island and State, and

WHEREAS the idea of permanently turning over the ownership of our public resource to a few private hands totally contradicts the principle of free enterprise, and is contrary to the fundamentals upon which our country is founded,

~~NOW, THEREFORE, BE IT RESOLVED, that the Kodiak Area Chamber of Commerce is opposed to the share quota system of allocation of ANY fisheries resources in Alaska, and that this resolution be communicated to the following people:~~

The President
Ronald Reagan

The Honorable Jay S. Hammond
Governor of Alaska

The Honorable Ted Stevens
United States Senate

The Honorable Frank H. Murkowski
United States Senate

The Honorable Donald Young
The United States House of Representatives

The Honorable John Breau
The United States House of Representatives

The Honorable Gerry Studds
The United States House of Representatives

NPFMC, Chairman, Clem Tillion

Alaska Legislature

Mssrs. Steve Cowper, Tom Fink, Bill Sheffield,
Dave Rose, Dick Randolph

PASSED AND APPROVED this _____ day of _____, 1982
by the Kodiak Area Chamber of Commerce.

KODIAK AREA CHAMBER OF COMMERCE

By _____
President

ATTEST:

By _____
Managing Director

ALASKANS OPPOSED TO FISHERY SHARES

POUCH 490 • KODIAK, ALASKA 99615

MAY, 1982

Fellow Alaska Fisherman,

~~We are a group of fishermen who are concerned about recent actions taken by the North Pacific Fisheries Management Council toward implementation of an "individual quota" or "share system" form of federal management for the Alaskan halibut fishery.~~

Under the proposed system, shares will be allocated on performance levels averaged over the last three years. The average percentage of the total quotas that an individual landed during those years will determine the size of the share he will be granted.

While an "individual quota" guarantees a minimum catch to the shareholder which he can harvest at leisure, at the same time it sets a maximum level of harvest that he may not exceed, unless he purchases more shares from another fisherman. This eliminates one of the most basic precepts of commercial fishing or any other business - that of fair competition and free enterprise. Under this system, a fisherman will either have to "hang it up" when his quota is reached no matter how much of the TOTAL quota has been harvested, or how good the fishing he's found; or he will have to buy more shares if they are available. This brings us to another point - the price of the shares.

Since "shares" not only provide the exclusive right to harvest, but also guarantee a percentage of the quota, it is easy to see that the value they will attain will be considerable. Since the shares come with a "lifetime guarantee", it has been conservatively estimated that their transfer price could be between 2½ to 5 times the gross sales value of the fish landed by the shareholder in a year. If the price for halibut is \$1.00/lb., then a 50,000 lb. share might cost \$125,000 to \$250,000 or even more. Obviously, the only buyers for shares will be the already successful fisherman who wants a bigger piece of the pie and can afford to buy it, or other interests with a great deal of buying power. The days of entry into that fishery by a hard-working individual with high hopes and a shoestring budget will be over. The ability to fluctuate between fisheries as needed will be greatly impaired by the shares system.

Most importantly, we feel we are witnessing only the beginning of the spread of the individual quota system through Alaska's commercial fisheries. Dr. James Crutchfield is a professor of economics at the University of Washington, a member of the Pacific Fisheries Management Council, and a major architect of limited entry theory and the shares system. Recently, in Fishermen's News (2nd issue, March '82) he says:

"I think the council's mandate parallels the common sense that any fisherman will tell you - that you can't manage single fisheries alone because the effects spill out to other fisheries, and ultimately I think we do have to have either management plans or a stated reason why we don't need a management plan for each of the major and some of the minor fisheries in the Pacific Coast states."

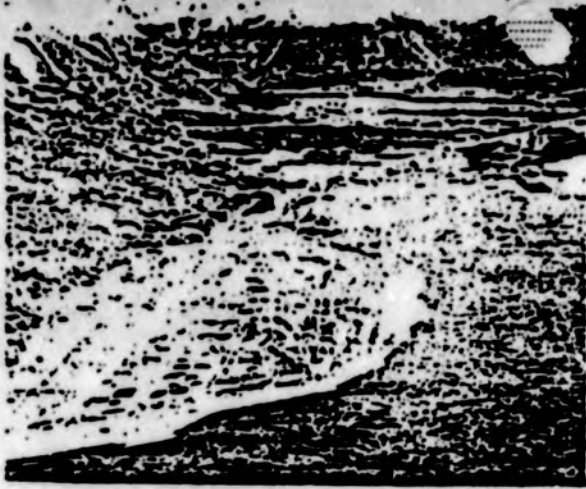
Dr. Crutchfield, Don Bevan (University of Washington), and Jim Richardson of the NPFMC, among others, were part of the work group that helped develop the shares management scheme for the halibut fishery. Their aim is to develop and implement management plans which will result in capital intensive and from their point of view more "efficient" fishery harvests. This threat is very real and the idea is NOT new - the shares concept has been developing since 1973 or so.

Like you, we are fishermen preparing for our summer seasons. We are NOT economists, politicians, or a lobby group. We think the most effective opposition to "shares" will come from YOU, individual fishermen, and your fisherman's associations. Our group was formed in an effort to inform as many Alaskans as we can of the immediacy of this situation, and to try to impress upon you the importance of making your feelings known to those who can affect its outcome.

Included in this mailing is a list of names and addresses of people who should be made aware of your feelings on this subject --- the more of them you write to, the better. In addition to the list of names, your STATE legislators should be informed, and if you are a member of a fisherman's organization, urge them to take a strong and vocal stand.

We will continue to inform as many Alaskans as possible through statewide ads, mailouts, etc. This is expensive, so we need donations; we have no other source of income. Make checks payable to:

ALASKANS OPPOSED TO FISHERY SHARES
Pouch 490
Kodiak, Alaska 99615



SEWARD
CHAMBER of COMMERCE

HOME OF THE SILVER SALMON DERBY

BOX 756 SEWARD, ALASKA 99664



May 19, 1982

Alaska State Legislature
Pouch V
Juneau, AK 99811

The Seward Chamber of Commerce wishes to
express its support of the Kodiak Chamber
of Commerce resolution opposing the share
quota system of allocation of fisheries
resources

Sincerely,

Brent Whitmore
Brent Whitmore
President

Enclosure