

ALASKA LEGISLATURE COMMITTEE FILES 1991-1992 8672
7669 SENATE RESOURCES

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

X. Environmental Impact Assessment; Cumulative Impact

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

XI. Economic Impact Analysis; Cumulative Impact

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

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

XII. Community Development Quotas

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

Conclusion

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

Thank you for your attention.

Sincerely,

Thorn Smith
Executive Director

Council asks for study of IFQ impact

by Hal Spence
Staff Writer

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SPENCE

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

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

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

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

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



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

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

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

We propose that the Council instead recommend the following:

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

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

CITY OF CORDOVA



December 2, 1991

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

Dear Chairman Lauber:

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

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

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

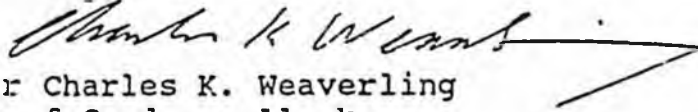
North Pacific Fisheries Management Council
December 2, 1991
Page 2

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

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

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

Sincerely,



Mayor Charles K. Weaverling
City of Cordova, Alaska

United Fishermen's Marketing Association, Inc.



P.O. Box 1035 Kodiak, Alaska 99615

Telephone (84-3453)



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

January 14, 1992

SENT VIA FAX #503-220-2565

Dear Rick,

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

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

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

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

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

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

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

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

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

Sincerely,

Jeffrey R. Stephan

May 31, 1991

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

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

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

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

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

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

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

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

Debra Lathrop

Debra Lathrop

Box 2796

Kodiak

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

RECEIVED MAY 18 1991

Dear Sir:

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

Thank You,
Bill Young

Mr. Cauber,

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

Sincerely,

Peter D. Devaris
Kodiak, AK

4/26/91

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

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

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

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

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

Sincerely,
Dennis Smedley Jr.

**KODIAK LONGLINE
VESSEL OWNERS' ASSOCIATION**

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

HALIBUT • SABLEFISH • PACIFIC COD • CRAB

May 17, 1991

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

Dear Fred,

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

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

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

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

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

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

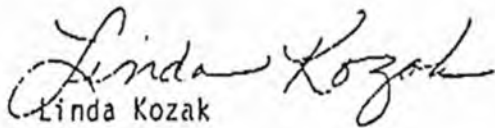
May 17, 1991
Page Two

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

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

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

Sincerely,


Linda Kozak
Executive Director

Enclosure



HALIBUT • SABLEFISH • PACIFIC COD • CRAB

CONCERNS WITH PROPOSED IFQ SYSTEM FOR SABLEFISH

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

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

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

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

RECEIVED
JUN 11 1981

Dear Watchdog

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

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

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

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

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

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

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

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

Waiting for Great Attention

Jerry B. Scholes

Jerry B. Scholes Box 15331 FCR
Juneau, Alaska 99801

Compiled from original source
by Donna Donohoe, Sitka

Effects Of NPFMC IFQ Plan On Coastal Communities

907-747-6467

01/06/92

Fleet Characteristics

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

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

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

Impact of Initial Allocation

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

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

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

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

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

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

Protection Against Extreme Consolidation?

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

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

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

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

IFQ VERSUS LIMITED ENTRY

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

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

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

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

Conclusion

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

SOUTH CENTRAL ALASKA LONGLINE ENTERPRISE

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SEWARD, ALASKA 99661

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

GOVERNOR HICKEL,

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

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

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

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

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

SINCERELY,

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

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

The Editor
Homer News
3482 Landings Street
Homer AK 99603

Dear Sir:

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

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

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

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

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

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

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

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

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

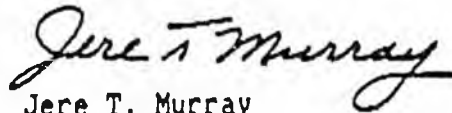
able to use their longline gear in the cod fishery as the plan requires the possession of halibut or sablefish IFQs to fish cod! Many may not be able to buy QS in the future. No crewmen will receive any QS as crewmen - their numbers are unknown but surely there are several tens of thousands. The current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

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

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

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

Sincerely,



Jere T. Murray

THE SABLEFISH/HALIBUT IFQ PLAN IS BAD FOR ALASKA

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

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

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

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

Fewer cannery workers will be needed.

Coastal Alaska communities may experience reduced income and population.

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

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

They are cheated of their rights to the resource.

They can quit fishing halibut or buy in.

30000 crewmen - mostly Alaskans - receive no IFQs.

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

They are cheated of their rights to the resource.

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

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

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

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

Alaskans may be at a disadvantage in this market.

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

The rights to harvest will have to be purchased.

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

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

This IFQ plan may allow overfishing the cod resource.

The availability of fresh halibut in Alaska may be reduced.

"Dock sales" will be expensive and cumbersome.

Seller may have to post a bond.

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

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

compiled by Jerr Murray
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(907) 234-7646

MR. RICK LAUFER, Chairman

N.P.F.M.C.

et al

KODIAK

JUNE 10, 1991

CHARLES L. SINK

SR 6247

KEVIN, HI. 96749

Dear Sirs:

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

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

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

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

fishermen now have.

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

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

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

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

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

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

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

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

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

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

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

Charles L. Sink



KODIAK OIL SALES, INC.
NORTH PACIFIC FUEL
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KODIAK, ALASKA 99615

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

May 22 1991

Re: IFQ's

Dear Sirs:

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

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

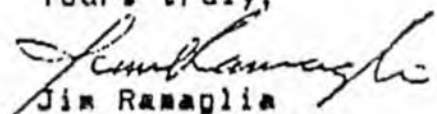
The IFQ system has failed in other parts of the world and I think the North Pacific Council should learn something from these examples.

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

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

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

Yours truly,


Jim Ramaglia
vice president

May 28, 1991

Dear Sirs:

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

Sincerely

Bonnie Sudder

Bonnie Sudder

P.O. Box 3708

Kodiak, Ak

99615

May 24, 1991
Box 3080, Kodiak
Alaska 99615

NPFMC Box 103136
Anchorage, AK 99510

Dea. Mr. Lauber,

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

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

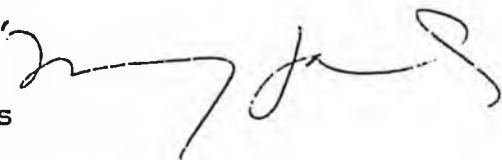
I thought any IFQ system would self-destruct. There would always be those who would be hurt and they would fight the system. We've been worn down by the ten year seige to get federal limited entry. In spite of studies that show that permits leave the local communities, that the majority of shares would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

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

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

Sincerely,

Mary Jacobs



RON THOMPSON
BOX 567
KODIAK, AK 99615

DEAR SIR:

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

THANKS .. Ronald B Thompson

May 9th, 1991

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

Dear Mr. Lauber,

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

Sincerely,

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

RECEIVED MAY 18 1991

Dear mister Rick Touber.

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

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

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

Kevin M & Lynn
PO BOX 1897
Kodiak AK

May 14, 91

Dear Sir:

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

A concerned Ak. Voter,

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

5-13-91

Dear Sir:

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

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

Thank you for your prompt consideration and action;

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

To Whom It May Concern,

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

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

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

You and the Worlds Fund.

Michael Brian Jones

MICHAEL BRIAN JONES

GEN. Del.

Death Harbor

Dear Sir,

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

Thank you
Alon Johnson
711 CHART-07-81CT

15 May - 1991

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

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

Troy M. Saue

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

Dear Sir;

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

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

Thank you for your prompt
attention to this matter.

Yours
Alan Rudolf McGillivray
Alan Rudolf McGillivray
P.O. Box 8165
Hobart TAS 79615

THANK YOU FOR YOUR TIME
Damon Young

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

DEAR SIR:

REC'D 1/11/15
99615

10. Box 1924
Kodiak, AK 99615

Dear Sir ~

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

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

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

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

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

North Pacific Fisheries Management Council
Anchorage, Alaska

Agenda Item C-4

Mr. Chairman and members of the NPFMC:

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for your time and consideration of my views.

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

Oliver N. Holm
Box 3865
Kodiak, Alaska 99615

NPFMC
Anchorage, AK

Dear Mr. Chairman:

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

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

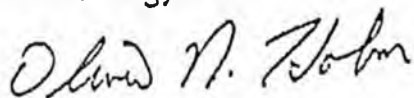
The Magnuson Act gives some mention to protecting the historic social organization of the fisheries. The IFQ system only protects the interests of the first round of fishermen who are given the quotas. Crewmen, shoreworkers, processors, suppliers and Alaska's coastal communities have a stake in these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

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

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

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

Sincerely,



Oliver N. Holm
President, Kodiak Longliners Association

September 15, 1991

IFQ RESOLUTIONS

ALASKA MUNICIPAL LEAGUE

CITY OF ANCHORAGE

BRISTOL BAY BOROUGH

CITY OF CORDOVA

HAINES CHAMBER OF COMMERCE

CITY OF HOMER

CITY OF KENAI

KENAI PENINSULA BOROUGH

KENAITZE INDIAN TRIBE I.R.A.

KODIAK AREA NATIVE ASSOCIATION

CITY OF KODIAK

KODIAK ISLAND BOROUGH

KODIAK ISLAND MAYORS LEAGUE

OUNALASHKA CORPORATION

CITY OF OUZINKIE

CITY OF SAND POINT

SELDOVIA VILLAGE TRIBE

SEWARD CHAMBER OF COMMERCE

CITY OF SEWARD

SITKA CHAMBER OF COMMERCE

SOUTHWEST ALASKA MUNICIPAL CONFERENCE

CITY OF UNALASKA

CITY OF VALDEZ

CITY OF WHITTIER

WRANGELL COOPERATIVE ASSOCIATION

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

EC & RIV-1

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

Resolution of the Alaska Municipal League

Resolution No. 92-XX

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

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

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

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

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

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

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

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

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

2
3 CLERK'S OFFICE
4 AMENDED AND APPROVED

5 Date: 12-10-91

6 *Vetoed 12/17/91*

7 *Overridden 1-7-92*

8 ANCHORAGE, ALASKA

9 AR NO. 91-267 (AS AMENDED)

Submitted by: Assemblymembers Abney
and Barnett

Prepared by: Assembly Utility Budget
Analyst

For reading: December 10, 1991

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

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

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

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

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

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

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

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

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

NOW, THEREFORE, the Anchorage Assembly resolves:

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

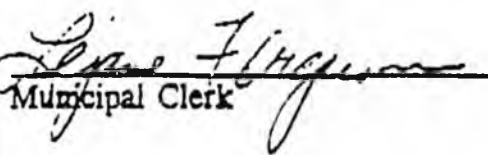
Section 2: That the North Pacific Fishery Management Council rescind its vote to implement the IFQ Program, carefully scrutinize this proposal including its impact on Alaska fishermen and communities, and implement traditional management methods prior to any further discussion on an IFQ System.

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

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


Chairman

ATTEST:


Municipal Clerk

TAW:egj
DOCC/AR47

LETTERMAN
BOROUGH MANAGER



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

Bristol Bay Borough

BOX 188 • NAKNEK, ALASKA 99833

NOV 25 1991

November 25, 1991

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

Dear Chairman Lauber,

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

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

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

Sincerely,

Fred W. Pike
Mayor

CITY OF CORDOVA



December 2, 1991

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

Dear Chairman Lauber:

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

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

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

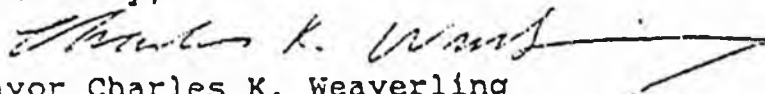
North Pacific Fisheries Management Council
December 2, 1991
Page 2

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

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

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

Sincerely,



Mayor Charles K. Weaverling
City of Cordova, Alaska

CITY OF CORDOVA, ALASKA

RESOLUTION 91-47

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

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

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

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

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

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

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

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

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

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

Resolution 91-47

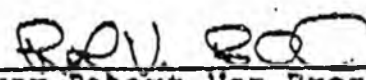
Page 2

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

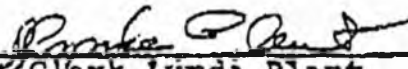
BE IT FURTHER RESOLVED the North Pacific Fishery Council is requested to continue the open access (status quo) management of the sablefish and other fisheries under Council jurisdiction.

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

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



Mayor Robert Van Brocklin



City Clerk Lynda Plant

Haines Chamber of Commerce

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



December 18, 1991

DEC 23 1991

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

RE: Proposed Halibut IFQ System

Dear Members of the Management Council:

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

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

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

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

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

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

Sincerely,

Patty A. Glackin

Patty A. Glackin, President

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

CITY OF HOMER
HOMER, ALASKA

RESOLUTION 91-82

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

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

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

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

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

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

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

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

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

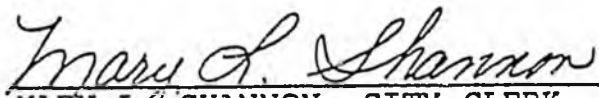
BE IT FURTHER RESOLVED that the City Clerk send copies of this resolution to the North Pacific Fisheries Management Council, Governor Hickle, Senator Murkowski, Senator Stevens, Representative Young, Federal Department of Commerce and the State Department of Community and Regional Affairs.

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

CITY OF HOMER


HARRY E. GREGOIRE, MAYOR

ATTEST:


MARY L. SHANNON, CITY CLERK

COPY

C-5

Suggested By: Mayor Williams on
behalf of the
Fishing Community

CITY OF KENAI

RESOLUTION 92-2

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

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

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

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

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

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

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

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

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

Y9903
COPY

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

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

John J. Williams, Mayor

ATTEST:

Carol L. Freas, City Clerk

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

KENAI PENINSULA BOROUGH
RESOLUTION 91-138

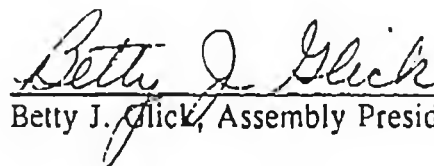
**A RESOLUTION URGING THE NORTH PACIFIC FISHERY MANAGEMENT
COUNCIL TO ANALYZE AND IMPLEMENT TRADITIONAL MANAGEMENT
METHODS PRIOR TO ANY FURTHER DISCUSSION OF
AN INDIVIDUAL FISHERY QUOTA SYSTEM**

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

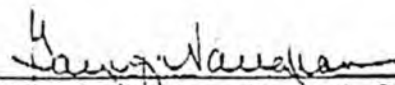
NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH:

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

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


Betty J. Glick, Assembly President

ATTEST:


Gaye J. Vaughan, Borough Clerk

JAN 17 '92 15:58 FROM NARF ANCHORAGE

PAGE.001

Kenaitze Indian Tribe I.R.A.

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

RESOLUTION 92-01

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

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

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

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


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

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

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

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

DATED: January 17, 1992


Paul Swetzof, Council Member
Kenaitze Indian Tribe

**Kodiak
Area
Native
Association**



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

June 14, 1991

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

RE: Sablefish and Halibut IFQs

Chairman Lauber:

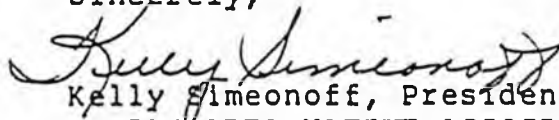
The Kodiak Area Native Association serves the Native people in the coastal communities on Kodiak Island.

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

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

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

Sincerely,


Kelly Simeonoff, President
KODIAK AREA NATIVE ASSOCIATION

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

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

RECEIVED FEB 27 1990

CITY OF KODIAK
RESOLUTION NUMBER 07-90

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

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

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

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

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

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

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

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

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

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

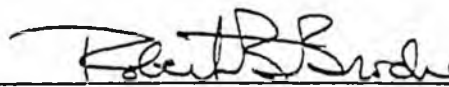
BE IT FURTHER RESOLVED that the North Pacific Fishery Management Council is respectfully requested to abandon all efforts to study, plan, encourage, or recommend implementation of limited access in the groundfish fisheries in Alaska.

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

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

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

CITY OF KODIAK


MAYOR

ATTEST:


CITY CLERK

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

KODIAK ISLAND BOROUGH
RESOLUTION NO. 90-20

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

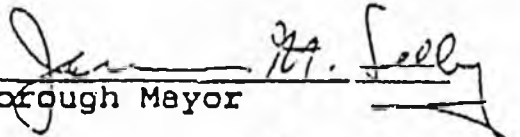
BE IT FURTHER RESOLVED that if the council recommends the adoption of limited access in the groundfish fisheries, then the Secretary of Commerce is respectfully requested to reject this recommendation.

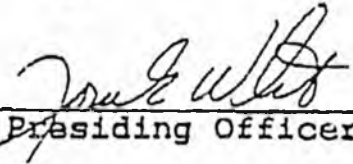
BE IT FURTHER RESOLVED that copies of this resolution shall be sent to the Honorable Robert A. Mosbacher, United States Secretary of Commerce; Dr. John A. Knauss, Under Secretary for Oceans and Atmosphere, National Oceanic and Atmospheric Administration, U.S. Department of Commerce; Mr. Steve Pennoyer,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

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

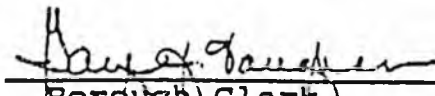
PASSED AND APPROVED THIS 15th DAY OF FEBRUARY, 1990.

KODIAK ISLAND BOROUGH


Borough Mayor


Presiding Officer

ATTEST:


Borough Clerk

KODIAK ISLAND MAYORS LEAGUE

RESOLUTION 91-15

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

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

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

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

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

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

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

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

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

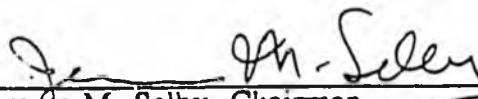
NOW, THEREFORE, BE IT RESOLVED by the Kodiak Island Mayors League, that:

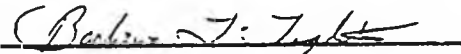
Section 1: The Alaska State Legislature and the Governor intercede on behalf of Alaska fishermen to prevent any negative economic impact or hardship on them and affected Alaska communities as a result of the IFQ System.

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

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

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


Jerome M. Selby, Chairman
Kodiak Island Mayors League 1991

Attest: 

Date: 12-12-91



RECEIVED DEC 23 1991

December 13, 1991


Senator Fred Zharoff
PO Box 405
Kodiak, AK 99615

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

Dear Senator:

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

Thank you,


Wendy A. Svarny
Secretary

enclosure

cc: file

RESOLUTION 91-12-03

OF THE BOARD OF DIRECTORS
OF
OUNALASHKA CORPORATION

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

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

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

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

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

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

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

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

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

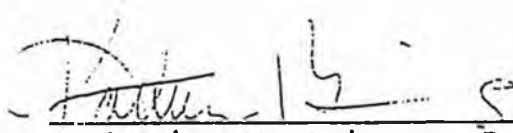
NOW, THEREFORE, the Ounalashka Corporation resolves:

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

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

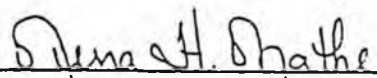
Section 3: That copies of this resolution be sent to Governor Walter J. Hickel, the North Pacific Fishery Management Council, State Senator Zharoff and Representative Jacko, U.S. Senators Stevens and Murkowski, and Representative Young.

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



Katherine M. Grimnes, President

ATTEST:



Nena H. Mathe, Corporate Secretary

CITY OF OUZINKIE

P. O. BOX 109

OUZINKIE, ALASKA 99644

(907) 680-2209



March 27, 1990

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

Dear Mr. Pautzke,

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

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

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

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

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

Sincerely,

Zack Chichenoff

Zack Chichenoff
Mayor
City of Ouzinkie

CITY OF OUZINKIE
RESOLUTION 90-02

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

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

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

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

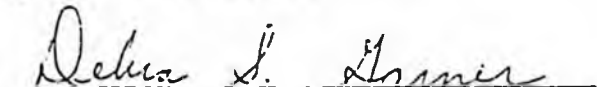
WHEREAS, these NPFM council initiatives are contrary to the
best interest of Kodiak fisherman, processors, processing
plant employees support industries, and villages and;

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

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

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


Zack Chichenoff, Mayor
City of Ouzinkie


Attested: Debra Garner, Clerk

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

Fax Transmittal Memo 7872

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

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

Res 92-5 077 IFQ'S.

Attach Document At Line

City of Sand Point

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

RESOLUTION 92-5

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

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

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

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

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

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

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

PASSED AND APPROVED THIS 17 day of September, 1991.

Stanley J. Miller
Mayor

ATTEST:
Walter A. Bushka
Clerk