

**COMMUNITY PERSPECTIVE on
Halibut Charter Fishing Limited Entry Permit (LEP) Program
By Ken L Larson 22 January 2010**

The good news is that Halibut Charter sports fishermen in South Central Alaska, including Valdez, will still be able to catch 2-fish per day and have 4-fish in possession, at least for 2010. The bad news is that Halibut Charter fishermen in SE Alaska were forced to 1-fish limits in 2009 and they will continue for the foreseeable future, and include further restrictions such as weekly non-fishing days and seasonal limits, drastically effecting Charter & Lodge operators. Non-guided Halibut sports fishermen in all of Alaska are still able to follow the 2/4-fish rule, for the time being.

Please note that per ADF&G's published statistics, Charter and Non-guided Halibut Sport and Subsistence fishermen account for 10-15% of the total Halibut caught each year, and the Commercial Longliners (COMFish) control the remaining 85-90% catch, including By-Catch. The COMFish Longliners have worked under a Limited Entry Individual Fishing Quota (IFQ) Permit system since 1995 when their initial IPHC-mandated state-wide Catch Limit (CL) was 48.4M lbs. The COMFish IFQ CL is adjusted annually by IPHC to reflect the health and sustainability of the Halibut Fishery. The COMFish CL peaked in 2003 at 74.4M lbs and has predictably cycled downward to the present IPHC-proposed 2010 CL of 48.7M lbs, which is a 9.9% decrease from 2009's 54.08M lbs CL. It should be noted that these COMFish IFQ's were issued by NOAA, as recommended by the various COMFish-dominated NMFS & NPFMC Councils and ADF&G Boards, without much regard to sport fishermen, guided or non-guided.

The Halibut Charter Fleets in SE & South Central have been growing since the early 1990's, which resulted in a Guideline Harvest Level (GHL) being forced on the charter fleet by NOAA in August, 2003. The GHL acts like a soft Cap and the GHL-mandated catch limit management measures have lead to the current 1-fish limits in SE. The SE Charter Fleet drastically exceeded their imposed 1.43M lbs GHL every year after 2003 by 22.2 – 114.7%. The South Central Charter Fleet exceeded their imposed 3.65M lbs GHL by 0.4 – 9.6% in just 4 of the years since 2003, and have been below the GHL since 2007, hence their retention of 2-fish limits. As a result, a Moratorium on new Charter Operator Entrants by use of a Limited Entry Permit Program, has been in the works since about 2003, and will go into effect on 1 Feb 2011. The LEP Program will issue permits to those Charter Operators who have a qualifying ADF&G LogBook-documented catch history in 2004 OR 2005 AND 2008. Approximately 62% of the 854 Charter businesses active in Alaska in 2008 will receive LEP's in 2010.

In addition to the LEP, NMFS's North Pacific Fish Management Council (NPFMC) is implementing a "Catch Sharing Plan (CSP)" that is formula-driven based on COMFish & SportFish's annual Total Catch. CSP Final Rule Making will probably happen in 2010 and the CSP will most likely start dropping the GHL Caps by instituting management measures, like 1-fish over 32" + 1-fish under 32" limits, or worse, to bring down the Charter sport catch in 2011. Since non-guided sport fishermen now account for more than 35% of the sport catch, they too, will most likely soon be targeted for Halibut catch restrictions.

Ken L Larson, 1074 Eliz Street, North Pole, Alaska 99705, is the past President and current Secretary of the Prince William Sound Charter Boat Assn, and has sport fished in PWS since 1984 and operated SANITY CHARTERS since 1993. Cell: (907) 255-2798 Home: (907) 488-2960