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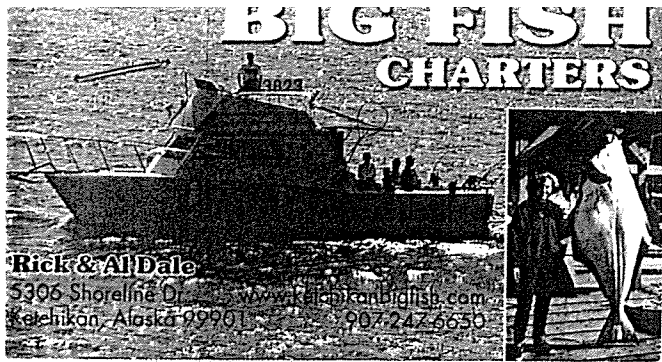
N.P.M.C.
Sam Cunningham
605 W. 4th St 306
Anchorage, AK.
99501-2252

NMFS # 81024

RECEIVED
MAR 11 2015 2-6-15

Dear Sir,

After receiving your Jan 2015 letter about annual conversion factors for **GAF** I would like to point out a few things: If a guided angler catches a 30 lb. halibut and it is his second for the day and is retained as **GAF** the **IFQ** permit holder is charged for 67.3 lbs in Area 2c. Commercial halibut fishermen simply use the Halibut length + weight chart in every tidebook to determine the weights of every fish and that is deducted from his **IFQ's** and is extremely accurate. That is the most fair way to charge accurately and should be adopted and recorded on the logbook in length and deducted from the **IFQ** holders account based on that. Every fish retained is then accurately worth its own weight. A 67.3 lb fish at \$6.80 = \$457.00 The present conversion formula is inaccurate and changes every year.



NMFS # 81024

NOAA Fisheries 2.
Alaska Region
RAM
Box 21668
Juneau, AK.
99802

2-6-15

Dear Sir,

Second thing, under the Instructions For Application to Transfer IFQ and GAF one note states: NMFS will accept Applications to return GAF to IFQ from Aug 1 to Aug 31 only. etc. Most of us guide untill the end of Sept. then return to commercial fish in October. Why not change that date untill Sept. 30 so we can continue to fish the GAF untill the end of our charter season?

Lastly, let's keep our eye on the prize and do the best we can to provide fun and exciting fishing trips for our clients so they continue to come back and support our coastal communities with tourism dollars. The ability for them to keep any size halibut they catch is extremely important to keep the clients returning throughout Alaska! There already are many mechanisms in place for fish sustainability. Let's try to sustain our clients and businesses as well.

Sincerely, Dick Dale



UNITED STATES DEPARTMENT OF COMMERCE
 National Oceanic and Atmospheric Administration
 National Marine Fisheries Service
 P.O. Box 21668
 Juneau, Alaska 99802-1668

GUIDED ANGLER FISH
 ANNUAL CONVERSION FACTORS
 FOR THE 2015 FISHING YEAR
 NOAA FISHERIES, ALASKA REGION
 JANUARY 2015

Guided Angler Fish (GAF) conversion factors are posted annually. Conversion factors are not subject to change during the fishing year and may not be challenged.

Federal regulations at 50 CFR 300.65(c)(5) provide that the net pounds of halibut Individual Fishing Quota (IFQ) transferred to/from an IFQ permit holder in IPHC regulatory area 2C or 3A will be equal to the number of GAF transferred to/from the GAF account of a GAF permit holder in the corresponding area, multiplied by the estimated average net weight determined as follows.

For the first calendar year after the effective date of the regulations the average net weight will be estimated for all halibut harvested by charter vessel anglers during the most recent year without a size limit in effect. *April 2014?* *2011? 26.4*

After the first calendar year after the effective date of these regulations, the average net weight will be estimated from the average length of GAF retained in that area during the previous year as reported to NMFS via the GAF electronic reporting system. If no GAF were harvested in a year, the conversion factor will be calculated using the same method as for the first calendar year. *2015* *lbs.*

New rule

The conversion factors for 2015 estimated from the average length of GAF that were retained in each area, as reported to NMFS via the GAF electronic reporting system, during the previous year are as follows:

Area 2C: 67.3 lbs *\$487. / fish*
 each fish is worth almost *\$500. now*
 Area 3A: 38.4 lbs *26.4 lbs*

NMFS will round up to the nearest whole number (no decimals) when transferring IFQ to GAF and when transferring GAF to IFQ. Expressed algebraically, the conversion formula is:

$$\text{IFQ net pounds} = (\text{number of GAF} \times \text{average net weight})$$

$$67.3 \text{ lbs} \times 5 \overset{\text{GAF}}{\underset{\text{Fish}}{\text{Fish}}} = 336.5 \text{ lbs IFQ}$$

$$\times \$6.80 / \text{lb commercial price}$$

$$\hline \$2,288.00$$

