

Dr. Bruce M. Leaman  
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December 27, 2005

Re: **IPHC STAFF PRELIMINARY CATCH LIMIT RECOMMENDATIONS – 2006**  
PROPOSED LOWERING OF HALIBUT HARVEST RATES IN AREAS 4B  
AND 4CDE FROM 20% TO 15%. COUNTERPROPOSAL TO MAINTAIN  
4B AND 4CDE HARVEST RATE AT 20% FOR 2006.

Dear Dr. Leaman,

Thank you for the opportunity to comment on the preliminary catch limit recommendations prepared by the IPHC staff for the 2006 season. In reviewing these recommendations, our primary concern is that the IPHC is taking a biased and unscientific approach calculating the abundance of the halibut resource from management area to management area and the setting of Catch Limits in these areas.

Specifically we believe the extremely cautious approach which the staff has undertaken in lowering the harvest rates at 15% for Area 4B and 4CDE has not been mirrored in the setting of quotas in other regulatory areas where more serious questions have arisen as to the reliability of the IPHC stock assessments, the overharvesting of regional stocks, and the continued setting of historically high catch limits (2C Southeast Alaska and 2B British Columbia). This perception of setting area quotas using uneven yardsticks threatens to undermine the credibility of the IPHC as an impartial custodian of the North Pacific Halibut fishery.

The IPHC staff has recommended a harvest rate in Areas 4B and 4CDE of 15% for year 2006 compared to 20% in year 2005. In other regulatory areas, the 2006 staff recommendation proposes harvest rates of 20% (4A and 3B) and 22.5% (3A, 2C, 2B, and 2A). These harvest rates are similar to those implemented in setting 2005 regulatory quotas in these respective areas.

Although various reasons are given in the Staff Catch Limit Recommendation to justify the proposed lower exploitation rates for 4B and 4CDE, it appears to many participants in the 4B and 4CDE fisheries that a substantially different set of management criteria is being used to manage these areas than are being employed in the management of other regulatory areas, specifically Areas 2C and 2B (Southeast Alaska and British Columbia).

Commercial CPUE's in Areas 4B and 4CDE remain substantially higher than corresponding CPUE's in Areas 2C and 2B. Unlike Areas 2C and 2B where close to 100% of possible halibut grounds are commercially exploited, large areas of 4B are unfished (due to extreme tidal currents) and an even larger section of 4CDE (specifically 4E) have never been commercially fished. In addition, these areas have the least amount of setline surveys conducted by the IPHC compared to other areas. The IPHC has often stated that the setline surveys in these 4 Areas are inadequate to accurately depict the halibut biomass in this region. The entire Area 4 rivals in size the combined Areas 3A and 3B and greatly exceeds the combined Area 2C and 2B. For over 10 years, the IPHC has used the low relative number of setline surveys conducted in Area 4 to justify lower harvest exploitation rates. Little has been done to remedy the situation by increasing the number of surveys. Instead, the Staff Recommendations for 2006 takes the draconian approach of cutting the harvest in Areas 4B and 4CDE from 20% to 15%, a 25% reduction from 2005 to 2006 while again conceding that they don't have sufficient data to create a reliable biomass model.

As a counterpoint, much evidence exists that regulatory Areas 2B and 2C have resource abundance questions exemplified by declining commercial CPUE, localized halibut stock depletion, with many 2B/2C IFQ holders believing that catch limits are being set unreasonably high. Intense fishing efforts being conducted on smaller and smaller "hotspots", have become commonplace in both Area 2 management areas. In spite of these issues and concerns, the IPHC continues to recommend 2C and 2B quotas at or near all-time historical highs.

In a comparison between these two regions, the Bering Sea/Aleutian Islands and Southeast Alaska/British Columbia, in Area 4 (4A,B,C,D,E) the IPHC staff has recommended a total catch for 2006 of 8.57 million pounds. In the combined Areas 2B and 2C, the staff has recommended a total catch of 23.85 million pounds, approximately 278% higher than the combined Area 4 quotas. These recommendations have been made even though Area 2C and 2B has less than 1/3 the geographical fishing area compared to Area 4. More importantly the commercial CPUE's in Area 4 have always been considerably higher than the corresponding CPUE's in Areas 2C and 2B. The logic of a management and harvest strategy that sets catch limits almost three times higher in areas one-third the size, when commercial CPUE suggests lower population density, is questionable at best. Certainly this management approach does not reflect the cautious and conservationist approach that the IPHC suggests is necessary in the management of the Area 4 fisheries.

In many aspects the 2006 IPHC Staff Recommendations appears to embrace defacto the alternative harvest policy termed the "Conditional Constant Catch" (CCC) harvest policy introduced by Dr. Hare and Dr. Clark of the IPHC staff in 2003. This policy, which embraced a realignment of regional catch limits based on other factors than halibut stock densities (such as historical harvest patterns dating back to the 1930's), was rejected by the IPHC and the commercial industry as being a political and possibly contentious method of allocating quotas between regulatory areas using other than scientific comparative data and a management approach that could easily lead to regional depletion of halibut stocks.

In closing I believe that it is important for the IPHC to take a fair look at these issues. For many of the participants in the 4B and 4CDE fisheries the halibut fishery represents one of the few commercial fisheries available to them (CDQ groups, St. Paul, St. George and Atka Communities). All of these participants strongly support a management plan for the Halibut fishery that has conservation as a fundamental cornerstone. However, support for maintaining the IPHC as the management body for the halibut fisheries will weaken in these areas if the perception exists that these areas have been marginalized by the IPHC management policies. The quickest way to lose support would be to create the impression that regulatory areas are treated differently from others based on factors other than clear and impartial scientific data and current commercial CPUE's. Such an impression would invariably cause long-term harm to the historic IPHC's mission of effectively managing the Pacific Halibut resource. As an impartial and non-political managing entity the IPHC needs and deserves the full support of all members of the North Pacific Halibut industry.

Sincerely,

Nick Delaney  
Alaskan Leader Fisheries, Inc.  
Kodiak Vessel Owners Association

cc: Robin Samuelson, Chief Executive Officer, Bristol Bay Economic Development Corp.  
Eric Olson, Fisheries Quota Manager, Bristol Bay Economic Development Corp.  
Ragnar Alstrom, Executive Director, Yukon Delta Fisheries Development Association  
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