

# Bristol Bay Economic Development Corporation

P.O. Box 1464 • Dillingham, Alaska 99576 • (907) 842-4370 • Fax (907) 842-4336 • 1-800-478-4370



December 30, 2005

Dr Bruce M. Leaman  
Executive Director, IPHC  
P.O. Box 95009  
Seattle, Washington 98145-2009

## Re: IPHC Staff Preliminary Catch Limit Recommendations for 2006

Dear Dr. Leaman,

As you may know, Bristol Bay Economic Development Corporation is one of six CDQ groups in western Alaska representing seventeen communities with a total population of approximately 5,600. We are extremely concerned that the IPHC preliminary catch limit recommendations for 2006, if adopted as proposed, will severely impact our communities.

Specifically we would like to address the IPHC recommendations for Areas 4B and 4CDE. As currently proposed, the IPHC is recommending a reduced harvest exploitation rate in those areas from 20% to 15% which will effectively cut our quota in those areas by 25%. This reduction is based, in your own words, on: "the sharp decline in survey, and commercial catch rates" and "the continued decline in biomass, to the estimated historical minimum, the lack of recruitment, and a new analysis of productivity." We do not believe this to be the case.

Furthermore, the IPHC has asserted that "the procedure for establishing a catch limit recommendation for the area (4CDE) is influenced substantially by the estimated biomass in Area 4A. By your own admissions: "staff is continuing its efforts to develop alternate procedures to determine appropriate yield for Area 4CDE." We strongly recommend that you undertake the development and implementation of those procedures before you make such drastic reductions in the harvest exploitation rates for those areas.

We ask that you consider the following items prior to any final recommendations:

- 1) The lower CPUE in area 4D was due in large part to the fact that 4C participants can now move to area 4D at will and we believe that was a significant factor this past year.
- 2) The CPUE data you have relied upon compares two years of operations with different regulatory schemes in place. Thus the data must reflect this or at least make mention of the fact.
- 3) The total number of survey stations in Areas 4B and 4CDE are extremely inadequate. We also understand that due to the lack of survey stations in these areas, often "proxy" results are relied upon from other stations in other areas.

For these reasons, and until substantive data is available, we believe the IPHC should not undertake reductions in Areas 4B and 4CDE based on lack of information.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Robin Samuelsen'.

H. Robin Samuelsen  
BBEDC CEO/President