

Chuck Ashcroft  
3580 Lake Trail Road  
Courtenay, B.C.  
V9N9M9

Dec. 30, 2007

International Pacific Halibut Commission  
1503 N.E. Boat Street  
Seattle, WA 98195-7951  
U.S.A

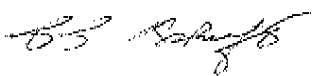
Dear IPHC,

Enclosed please find my submission for 2008 Catch Limit comments.

I also realize part of the submission (recreational treatment of sub-legal fish) possibly should have been sent for the November deadline but answers to some of our questions could not be answered until IPHC technical staff traveled to the Halibut Advisory Board meeting in Vancouver, Dec. 5, 2007. For this I apologize and will trust your judgment whether this can be brought forward for this annual general meeting or need further study.

I have also sent this via email to the desk of Laura Black as an adobe document which may make it easier for you for inclusion on your website.

Sincerely



Chuck Ashcroft

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## IPHC Catch Limit Comment Form

Comment on Regulatory Area: **2B**; Year: **2008**  
(Circle all that apply)

Submission Information (Please print or type)

Name: **Chuck Ashcroft**

Affiliation: **Sports Fishing Advisory Board**

Address: **3580 Lake Trail Road**

City: **Courtenay**

Province: **British Columbia**

Postal Code: **V9N9M9**

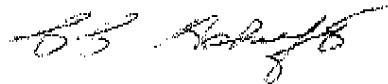
Canada

Telephone: **250 338-9935**

Fax: **250 338-9593**

Email: [chuckashcroft@telus.net](mailto:chuckashcroft@telus.net)

Signature:



### 1. What is your recommended catch limit or proposal?

a. That harvest rates for area 2b remain at the transition rate of 22.5%;

b. Request for IPHC Staff to consider; Recreational harvests of Halibut which are deemed of "sub legal" size to the commercial fishery, not be included as part of the Canadian TAC.

### 2. What is the supporting information for this recommendation (e.g., catch rates, biomass trends, recruitment, etc.)? Please be specific where possible.

#### a. Reasoning for 22.5% harvest rate in area 2b to continue;

i) Although the Biomass is considered at likely historically high levels, the problem has been identified as the exploitable biomass is low due to high populations of slow growing fish not yet reaching exploitable size.

-It has also been pointed out that many of these fish are males which never will reach exploitable size.

ii) Advice from IPHC staff that the models indicate the exploitable biomass is going to surge in the next years due to the strong 1999 and 2000 year classes entering the exploitable size range.

iii) Integration of the Canadian commercial fishery has negatively affected commercial CPUE in the fishery which, although trending downwards would not normally have decreased to the extent it has in the last two years if the fishery was not actively avoiding areas with a prevalence of Rockfish species. (*Admittedly the set line survey has also been trending downward*)

iv) Further migration studies need to be undertaken to further determine impacts of trawl fisheries on migrating juvenile halibut that would be continuing to migrate past juvenile stage east and south. Whose fish are being negatively impacted?

**As Per; Accounting for By-catch in Management of the Pacific Halibut Fishery (draft) (Clark and Hare); (Cited by American Fisheries Society vol. 18, Issue 4 Nov 1998)**

“Pacific halibut by-catch in other fisheries includes both adult fish that have completed their migrations and juveniles that may or may not have completed their migrations. The bulk of the trawl by-catch, for example, is made up of fish ages 4-6. Many of the juveniles in the by-catch are therefore fish that have been intercepted in the course of their migration, and their capture has the effect of reducing recruitment to the adult stock not in the area of capture but in the home area that they would have migrated to.”

v) Suggest that until the commercial fisheries in Alaska solve some of their by-catch issues area 2b should be able to keep a higher harvest rate including an increase in apportioning. (The same reasoning should apply for all of area 2)

***b. Reasoning for not including small “sub-legal” Halibut retained in Recreational Fishery in 2B in the TAC:***

i) Mortalities of “sub-legal” Halibut released in the directed Halibut and by catch fisheries are accounted for through a mechanism in determining harvest rates for each area.

ii) Mortalities of “sub-legal” Halibut released in the trawl fishery are accounted for in another manner due to prevalence of a modal length of 50cm.

iii) Current exploitable biomass includes only fish 81.3cm size and larger; the sub-legal sized halibut are not included in any fishery other than recreational.

iv) We would request that since the Canadian TAC is only comprised of the legal size 81.3cm size and larger (CEB) and since all other directed commercial mortalities of sub-legal fish are taken account of in the modeling for harvest rate (including wastage) in advance of determining CEY; then that part of the recreational harvest which is below that included in the CEB not be included in the Canadian harvest figures but also be treated the same by modeling the poundage into the harvest rates as per that done in commercial fisheries.

v. New data and improved monitoring of the recreational fishery in Canada is indicating that the mean average of undersize halibut kept is considerably less than that previously thought by IPHC. Additionally, the collection of length frequencies in the Canadian Recreational fishery should eliminate some concerns expressed in the "Discussion paper on 'regularizing' of by-catch, sport and subsistence catch. (by Steven Hare and William Clark)"

***2006 Canadian recreational fishery; (Utilizing J. O. Thomas Survey and DFO creel)***

-Mean average length of "sub-legal" fish kept in the 2006 fishery was 72.9cm (less than the "just barely sub-legal" size) originally thought by IPHC staff. (30% difference 72.9 cm =7 lb to 81.0cm =10 lbs net weight).

***2007 Canadian recreational fishery estimates;***

-Preliminary figures indicate that the halibut caught recreationally are likely, on the average, smaller than those caught in the 2006 fishery. More information is yet to come in for area 1.

-Preliminary results on length frequencies taken of 6357 fish sampled in the creel survey and lodge data indicate; that the mean average length of the "sub legal" fish measured is 70.9cm (4527 measured undersized fish)