

Rocky Littleton

Petersburg, Alaska  
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International Pacific Halibut Commission  
P.O. Box 95009  
Seattle, Washington 98145-2009

Dear sirs:

I am a 2C halibut fisherman that is concerned about the recent drops in the 2C halibut quotas. I would like to make a few observations and have a few questions answered if possible. I am not a scientist so some of my questions or views may be over simplified.

In regards to the pit tagging it seems that the low percentage of tags recovered may not show the actual percentages of fish that migrate to different areas. For instance when Bruce Leaman came through Petersburg it seems he said only about 1% of 3A fish migrated to 2C while approximately 4% migrated to area 2B. Common sense tells me that if 4% migrate to 2B than 7 or 8% should migrate to area 2C since we are much closer. It seems that had a few more of the tagged fish that migrated thru 2C to get to 2B had been harvested in 2C your survey could have had quite different results. Does the fact that fish are harvested at a higher rate in area 2B affect the percent of tagged fish that are caught in that area? In regards to the satellite tagging program there was some very significant movement. Do you use this migration in the apportionment of the quotas or do you just assume these fish just return to where they came from after spawning? Many or most of these fish may still be in the areas they moved too when the season opens in march. It seems that the satellite tags gave a lot of good information and hopefully there will be more such studies.

The information on growth rates was very interesting. It appears that fish in the western areas are growing much more slowly than fish in area 2C. There was a big concern that the amount of fish harvested that were over 20 years old was very small in area 2C, about 4%. In area 3A this percentage was 15%. If fish are growing more slowly in area 3A then it would follow that they would have a higher percentage of older fish in the catch as the fish become of legal size at an older age and have a greater chance to reach an older age as they are fished on fewer times than fish of the same age in area 2C. It seems that as growth rates slow there should be a higher % of fish over 20 years I am just wondering that if 4% of fish 20 years plus in 2C is a concern than at what % is it a concern in area 3A? If the fish are growing at different rates in different areas than doesn't it make sense to harvest at different rates because the biomass can replenish itself faster in areas where the fish grow faster. Also in area 2C the large fleet of charter vessels targets larger fish. Do you think that could affect the % of fish over 20 years caught by the commercial fleet? I asked a charter vessel owner what percent of fish he caught over 45 pounds, he was not sure but said it was much higher than 4%.

One of my biggest concerns is that there is no real hard number on the amount of fish caught by sports fishermen or the non-guided charter fleet. I feel this number could actually be much higher than the amount of halibut caught by the guided charter fleet. How can regulations be created to get this kind of information? Is it something the iphc can do or does the state have to do it? It seems if you are setting quotas without accurate information of what is being taken out of the biomass it would be easy to over harvest the halibut resource.

Thank You

