



Stakeholder Catch Limit Proposals

PREPARED BY: IPHC STAFF (9 JANUARY 2017)

PURPOSE

To provide the Commission with an opportunity to consider the catch limit proposals received from the stakeholders for 2017.

BACKGROUND

Each year after the Interim Meeting, the Commission accepts catch limit proposals from stakeholders through 31 December. At the Annual Meeting, the Commission considers these catch limit proposals before making their decision. Below is a table listing the proposals received. Full proposals follow, are posted on the IPHC website (<http://iphc.int/>), and are included in the meeting materials under the following Agenda sections:

7. REGULATORY PROPOSALS FOR 2017 (con't)
 - 7.4 Stakeholder catch limit proposals

Proposal #	Organization	Area	Proposal summary
STAKEHOLDER CATCH LIMIT PROPOSALS			
1	Doug Hatfield	Coastwide	Protect spawners
2	Luke Fanning, <i>Commercial longliner 2C,3A</i>	Coastwide	Reapportion at 2016 levels (status quo), do not shift fish from Area 2 to Area 3
3	Megan O'Neil et al., <i>PVOA plus several other assoc's and processors</i>	2 (with 2C focus)	Harvest policy and apportionment recommendations
4	Daniel Smith, <i>Commercial longliner 2C</i>	2C	Continue to slowly increase quota
5	Robert Mosher, <i>Commercial fisherman 2C</i>	2C	Increase 2C catch limit 10%
6	James Whitethorn, <i>West Bros. Group</i>	2C	Increase 2C catch limit to 8.22 MIb, commercial catch limit 5.03 MIb
7	Luke Fanning, <i>Commercial longliner 2C,3A</i>	2C	Increase 2C catch limit to 5.32 MIb
8	Paul Ewing, <i>Eagle Charters</i>	2C	Guided and unguided sport same regulations (except need for CHP), 1 halibut/day with 4 fish annual (Similar to reg proposal IPHC-2017-AM093-PropH)

RECOMMENDATION/S:

That the Commission:

- 1) **NOTE** paper IPHC-2017-AM093-PropQ which detailed each of the catch limit proposals received from Stakeholders by the deadline of 31 December 2016.
- 2) **CONSIDER** the stakeholder catch limit proposals in making final catch limit decisions for 2017.

Dear IPHC, " Every Halibut Counts..."

" It is advisable to look from the tide pool to the stars and then back to the tide pool again."
John Steinbeck, The Log From The Sea of Cortez (1941)

Thank you for spending an incredible amount of time and energy towards management of Pacific Halibut.

From pages 9 / 10 of your " Stock assessment (2016) and Draft Harvest Table (2017) " , several times I notice the words "...considerable uncertainty..." or "...substantial uncertainty..." or "...assessment uncertainty..." Will this years quota reflect this "...uncertainty..."??

Also on page 10 these words , for me anyway, are not very positive for long term Pacific Halibut stock health, "...in the near future it appears likely that a high degree of uncertainty in both stock scale and trend will continue to be an integral part of the annual management process."

Does IPHC have any scientific data to justify the early March opening for commercial halibut, when the potential for harvest of still spawning halibut is greatest? Fresh market availability and concerns about being able to fish salmon should Not be used to set harvest dates.

" Every Halibut Counts..."

I ask these questions in the name of all future generations so they may have the same opportunity I've enjoyed (dating back to 1967) to actively or passively enjoy this magnificent resource. For the record, I am not a halibut IFQ owner nor do I have any financial interest / gain from any sport fishing lodge or charter boat operation.

And hopefully IPHC will promote regulations that ensure protection of Huge Spawners like the one taken near Petersburg, Ak., last summer.

" Every Halibut Counts..."

Sincerely, Doug Hatfield

IPHC Catch Limit Comment Form

Comment on Catch limit: Coastwide/2A/2B/2C/3A/3B/4A Year: 2017
 (Circle all that apply)

Submission Information (Please print or type)

Name: <u>Luke Fanning</u>
Affiliation: <u>Commercial longliner and charter permitholder</u>
Address: _____
City: <u>Juneau</u> State/Prov.: <u>AK</u> Postal/ZIP Code: <u>99801</u>
Telephone: _____ Fax: _____ Email: _____
Signature: <u>Luke Fanning</u>

1. What is your recommended catch limit or proposal?

Do not accept the reapportionment suggested in the interim meeting, which effectively reallocates fish from area 2 to area 3. Leave the apportionment at status quo levels until further stability can be seen in area 3.

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

Catch rates (WPUE and NPUE) in both survey and fishery data in areas 2C and 2B have been steadily increasing for nearly a decade. Areas 3A and 3B have only recently seen stability and small increases in WPUE over the last two years. For that reason, it is premature to reapportion fish from the strongest areas, which are furthest into the recovery cycle (2C and 2B) to the weaker areas which have only recently stabilized (3A and 3B).

2C in particular had very strong survey data at +11% WPUE (032), and +7% WPUE (fishery). It simply does not make sense to reapportion fish away from one of the strongest performing areas.

December 28, 2016

International Pacific Halibut Commission
2320 West Commodore Way Suite 300
Seattle, WA 98199-1287

Dear IPHC Commissioners,

The following regulatory area 2C fishing associations would like to bring to your attention our concerns regarding catch limits across regulatory area 2.

We trust IPHC has successfully addressed stock assessment issues and retrospective problems; stock is now considered low, but stable and moderately increasing by all models.

At the 2013 Annual Meeting, IPHC initiated a Management Strategy Evaluation (MSE) process and established the Management Strategy Advisory Body (MSAB) to re-evaluate the harvest policy and apportionment scenarios. Critical elements of MSE process are to:

- Develop guidelines and ranges for overall stock removals that account for total removals, size when harvested, and uncertainty on future stock yield (e.g. SPR harvest policy).
- Reconcile area specific harvest rates with local productivity.
- Better align apportionment with fishery and survey weight per unit of effort (WPUE) trends.

Recognizing that the harvest policy has been under evaluation for 93 years, the Area 2C US fishermen recommend IPHC Commissioners and Advisory boards:

- Consider fishery WPUE and number of fish per unit of effort (NPUE) trends in addition to survey data when setting 2017 Area specific catch limits; areas with increasing indices should not be subject to apportionment reductions until a fully revised harvest policy is approved.
- Establish reasonably consistent net harvest rates across all of Area 2 and Area 3A so no one sub-area receives an excessive share of removals above the blue line in Area 2.
- Provide the necessary guidance and staff resources to the MSE and MSAB process to produce recommendations on a new IPHC harvest policy and apportionment strategy, prior to the 2018 Annual IPHC meeting.

In setting the 2017 catch limit recommendations, we request IPHC Commissioners recognize that:

- Area 2 stocks are increasing at current harvest rates.
- Area 2C survey WPUE is higher than any other IPHC area coastwide.
- Reductions in Area 2C catch limits are not justified by current data or trends.

- Harvest rates across Area 2 in general and Areas 2B and 2C in particular should be consistent.
- Until the Commission identifies an appropriate SPR for the halibut stock, catch limit adjustments in Area 2 should not be made at the expense of catch limits in other IPHC Areas.

As an industry, we thank you for your attention on this matter.

Sincerely,

Kathy Hansen
Southeast Alaska Fishermen's Alliance

Joe Morelli
Seafood Producers Cooperative

Megan O'Neil
Petersburg Vessel Owner's Association

Don Spigelmyer
Icicle Seafoods

Dale Kelley
Alaska Trollers Association

Mike Erickson
Alaska Glacier Seafoods

Dan Falvey
Alaska Longline Fishermen's Association

IPHC Catch Limit Comment Form

Comment on Catch limit: Coastwide/2A/2B/2C/3A/3B/4A/4B/4CDE Year: 2017
 (Circle all that apply)

Submission Information (Please print or type)

Name: Daniel Smith

Affiliation: Commercial longliner/2C quota holder

Address: _____

City: Wrangell State/ AK Prov.: _____ Postal/ZIP Code: 99929

Telephone: _____ Fax: _____

Email: _____

Signature: _____

1. What is your recommended catch limit or proposal? I recommend that the Quota in 2C continues to slowly increase.

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

My supporting information is catch rates. I have been longlining in Alaska for 30 years. I have watched the quota's rise and fall. I've also watched the catch rates rise and fall. The last few years have seen the 2C quota slowly rise as well as catch rates. My personal catch rates have annually gone up for the last 5 years in 2C. This year, was the highest catch rate yet. The Halibut population seems healthier than ever in 2C.

DEC 22 2016

IPHC

IPHC Catch Limit Comment Form

Comment on Catch limit: Coastwide/2A/2B/2C/3A/3B/4A/4B/4CDE Year: 2017
(Circle all that apply)

Submission Information (Please print or type)

Name: Robert T. Mosher

Affiliation: Commercial Fisherman / 2C IFQ Holder

Address: _____

City: Juneau State/Prov.: AK Postal/ZIP Code: 99801

Signature: _____

1. What is your recommended catch limit or proposal?

10% increase for 2C

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

The supporting info is all yours!
All catch rates & trends for 2C are increasing. Once again we're being punished by "another" new model! These models can't count all the fish in the sea. Let's manage what's real. Trends & Indices are up in 2C with no indication of overharvest. Give us some fish!!!

COMMENT ON REGULATORY AREA 2A, 2B, 2C, 3A, 4A, 4B, 4CDE**Name : James Whitethorn****Affiliation : West Brothers Group****Address :****City : Petersburg State/Prov. : Alaska Zip Code : 99833****Telephone :****Fax :****E-Mail :****Signature:**

1) What is your recommended catch limit or proposal?

West Brothers Group recommends a total removal of 8.22 million pounds for the 2017 season for 2C. Same as 2016. The commercial catch would be 5.03 million.

2) What is the supporting information for this recommendation, (eg catch rates, biomass, trends, recruitment, ect. Please be specific where possible.

See below

3) Attach any supporting materials

- 1) We feel that all areas should be run on an area by area model for apportionment.
 - a) With our increase in the setline survey from 104.3 lbs in 2008 to 209.0 lbs in 2015, and 12% up for 2016. We can justify the total removals of 8.22 million and a commercial catch of 5.03 million.
 - b) We feel that our biomass is under estimated by 40 million lbs in 2C.
 - c) With our survey increases, it pretty well proves that the fish don't migrate back west from 2C. That must mean that they are coming to spawn and because our size, being the largest In the total fisheries, don't seem to be showing up anywhere else. Also, the 1925-1976 survey show out of 9729 tags, only five fish west and four of those went only to 3A, 85 went to Charlotte South, while 1945 were caught in 2C.
 - d) We are concerned with our Eco system in 2C, with the overstock of halibut. Our brown crab, red crab and now we are finding halibut with full size dungy crab in their stomach.
 - e) Maybe our risk factor should separate for each AAF regional datasets.
 - f) Also, we feel because of the catch wastage of o.s., our commercial catch of 5.03 million is justified. We cannot figure out how we are responsible for 17% wastage because of coastwide average. How can we do any better than 0.5% wastage.

2) Setline Survey

- a) Average from 1977 – 2014 in 2C is 185.3 lbs per skate
- b) 2014 2C was 186.5 lbs per skate
- c) 2015 2C was 209.0 lbs per skate
- d) 2016 2C is about 235 lbs per skate (over twice that of your best area)

3) Total removals

- a) 1995-2014 2C was at an average of 10.96 million lbs of total removals.
 - b) 2015 total removals for 2C were 5.65 million lbs
 - c) 2016 total removals for 2C were 6.366 million lbs
- 4) If (by using area model) we take 75% of the 1995-2014 average of 10.96 million lbs, we would harvest 8.22 million lbs of total removals.

a) Total removals = 8.22 million

b) Charter 16 to 17 % = 1.48 million

c) Non Charter = 1.19 million

- d) Subistence and Wastage = .26 million
- e) Total other uses = 2.93 million

- 5) 2016 Total removals – 8.22 million
 - a) Minus other uses = 2.93 million
 - b) 2016 Commercial Catch = 5.03 million

G) Best fishing ever in 2C

- a) My personal catch was 350 per skate in the 2016 season
- b) Biggest average size at 35 lbs.
- c) We would like to see the Charter Fleet to get one fish without a slot size.
- d) Our bycatch is lower than 0.5 %
- e) We feel that 8.22 million total removals would be a number that could be used for a long term without decreasing our survey.
- f) This proposal was passed by PAG in 2016 and not considered by the commission.

Thank You.

The Time Series Set Line Survey (with high and low numbers kicked out) Credit to 2015 Blue Book (100 hooks at 1800 feet)

AREAS	2A	2B	2C	3A	3B	4A	4B	4CDE	ALL 4
average 1977-2014 set line survey average	21.7	74.3	185.3	192.7	22.9	153.1	114.3	16.3	
2014 setline survey	16.3	90.0	186.5	113.3	64.0	62.2	49.9	12	
2015 setline survey	22.1	87.2	209.4	101.2	7.3	56.1	56.3	15.2	
2014 commercial survey	109	286	228	230	99	132	168	167	
1955-2014 total removals average	155m	12.45m	10.96m	31.62m	1259m				16.68m
2015 total removals millions	C970	7.038	5.650	10.000	2650	1.390	1.140	1.285	

IPHC Catch Limit Comment Form

Comment on Catch limit: Coastwide/2A/2B/2C/3A/3B/4A/4B/4CDE Year: 2017 _____
(Circle all that apply)

Submission Information (Please print or type)

Name: Luke Fanning

Affiliation: Commercial Longliner (2C and 3A) and Charter Permit holder (3A)

Address:
City: Juneau **State/Prov.:** AK **Postal/ZIP Code:** 99801

Telephone: _____ **Fax:** _____ **Email:** _____

Signature: Luke Fanning

1. What is your recommended catch limit or proposal?

The combined commercial/charter harvest in area 2C should be set at 5.32 million pounds (an increase of 7.5% over the 2016 adopted limit).

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

2C has shown steady and consistent increases over multiple years, and in 2016 it surveyed stronger than any other area (with the exception of 3B). The survey and logbook data presented during the interim meeting provide additional evidence of strength in 2C:

1. +11% increase in survey WPUE (highest in over 14 years per interim meeting materials).
2. +7% increase in fishery WPUE (highest in 12 years per interim meeting materials).
3. +8% increase in survey NPUE (highest in over a decade).
4. Anecdotally speaking, the 2015 and 2016 seasons were the best I've seen in my career.

Despite clear evidence from these multiple sources that 2C continues to improve, the 2017 blue line would represent a cut of nearly 18% from the 2016 adopted limits. Both the blue line and SPR recommendations appear to contradict the survey and fishery data, so it is reasonable to question the accuracy of the modeling. If an 11% increase in WPUE warrants an 18% reduction in harvest (blue line), then what kind of an increase in the survey would have been necessary to maintain the harvest at the 2016 adopted level? How reasonable would that number have been?

The bottom line is that by all accounts, the 2C fishery continues to improve, and a modest increase in quota is warranted.

IPHC Catch Limit Comment Form

Comment on Catch limit: Coastwide/2A/2B/2C/3A/3B/4A/4B/4CDE Year: 2017
 (Circle all that apply)

Submission Information (Please print or type)

Name: Capt. Paul R. Ewing (20yr in Alaska)
 Affiliation: RACON Charters (13 Years)
 Address: Contract
 City: ELFIN Cove State/Prov.: AK Postal/ZIP Code: 99825
 Telephone: _____ Fax: _____ Email: _____
 Signature: _____

1. What is your recommended catch limit or proposal? ()
PROPOSAL: BUSINESSES THAT PROVIDE SELF-GUIDE FISHING SERVICES (IN THE NAME OF CONSERVATION) HAVE THE SAME HALIBUT REGULATIONS AS THE CHARTER BUSINESSES OTHER THAN THEIR NEED FOR CHARTER HALIBUT PERMITS.

CATCH LIMIT: AREA 2C; (1) HALIBUT PER DAY WITH A (4) FISH ANNUAL LIMIT FOR NON-RESIDENTS EITHER SELF-GUIDE (FISHING FROM A SELF-GUIDE BUSINESS) OR CHARTER BUSINESS.

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

CATCH RATES: SELF-GUIDE ANGLERS OPERATING FROM SELF-GUIDE BUSINESSES ARE CURRENTLY ALLOWED TO CATCH (2) HALIBUT ANY SIZE WITH NO ANNUAL LIMITS FOR NON-RESIDENTS WHO CAN RETURN MANY TIMES DURING THE SEASON THEREBY DEPLETING THE RESOURCE FOR FUTURE GENERATIONS. AS IN THE CHARTER FISHERY, IF ANYONE WANTS A SECOND FISH OF "ANY SIZE", THEY CAN PURCHASE IT FROM THE COMMERCIAL CATCH SHARE PROGRAM.

CATCH LIMITS:
 ENACTING THIS REGULATION WILL ALSO LOWER THE IMPACT ON THE IPHC MANDATED RECREATIONAL YEARLY QUOTA AS WELL AS CONSERVE THE HALIBUT RESOURCE.

Please attach any other supporting materials. All items submitted by December 31, 2015 will be considered at the IPHC Annual Meeting. Remember to include contact information and signature.