



## Stakeholder statements on regulatory proposals

PREPARED BY: IPHC SECRETARIAT (28 DECEMBER 2017)

### PURPOSE

To provide the Commission with a consolidated document containing 'Statements' from stakeholders on the range of Regulatory Proposals submitted to the Commission for its consideration at the 94<sup>th</sup> Session of the IPHC Annual Meeting.

### BACKGROUND

On 26 June 2017, the IPHC Secretariat announced (via IPHC Circular 2017-11) a new avenue for Stakeholders to submit comments on the range of Regulatory Proposals submitted to the Commission for its consideration. Specifically the Circular indicated that:

*“Informal Statements by stakeholders should be submitted as an email to the following address, which will then be provided to the Commissioners as Stakeholder Statements: [Statements@iphc.int](mailto:Statements@iphc.int) at each Session.”*

The new IPHC website contains further details on the process: <http://iphc.int/the-commission/fishery-regulations/>

### DISCUSSION

[Table 1](#) provides a list of the Stakeholder Statements received by the deadline of 23 December 2017, which are provided in full at Appendix I. The IPHC Secretariat does not provide commentary on the Statements, but rather, simply provides a collations for the Commissions consideration.

**Table 1.** Regulatory proposals received from Contracting Parties and stakeholders by the proposal deadline of 23 December 2017.

Appendix No.	Title and author	Date received
Appendix I	Regulatory Proposals C2, C4, C6, C9, C11, C12 (Paul Olson)	20 November 2017
Appendix II	Comments on Patty Phillip's Nov. 2017 proposals to IPHC (James Mackovjak)	17 December 2017
Appendix III	Written comment from Puffin Fishing Charters (Leslie Pemberton)	18 December 2017
Appendix IV	Comment on a Proposal to IPHC (Judy Brakel)	19 December 2017
Appendix V	Nil. (David A. Croonquist)	21 December 2017
Appendix VI	Nil. (James S. Kearns)	22 December 2017
Appendix VII	Comment on Regulatory Area 2C (James Whitethorn)	22 December 2017

### APPENDICES

As follows and listed in [Table 1](#).

Paul Olson, Attorney At Law  
606 Merrell St  
Sitka, AK 99835  
(907) 738-2400  
polsonlaw@gmail.com

November 20, 2017

Re: Informal Statement re: Regulatory Proposals C2, C4, C6, C9, C11, C12

International Pacific Halibut Commission:

I submit the following comments on behalf of The Boat Company, which provides guided halibut fishing opportunities in IPHC regulatory area 2C (Southeast Alaska). The Boat Company supports the intent of 2018 Regulatory Proposals C2, C4, C6, C9, C11 and C12 which would carve out exceptions to the IPHC's 2017 regulation 28(1)(d) that prohibits filleting of sport caught halibut in Alaska. The Boat Company conducts multi-day tours in southeast Alaska aboard two larger vessels, the 145' M/V Liseron and the 157' M/V Mist Cove and deploys smaller vessels for sport fishing activities. Its tours combine freshwater and saltwater sport fishing opportunities with eco-tour activities such as kayaking, hiking, and beachcombing. The total numbers of harvested halibut by clients are small relative to full-time charter operations, but an important part of the tour package involves processing and preserving halibut onboard the larger vessels for future client consumption.

The Boat Company requests that the IPHC move forward with consideration of exceptions to the regulation and evaluate reporting requirements that would meet enforcement needs while increasing processing flexibility as sea for multi-day charter operators. Regulation 28(1)(d) provides that:

no person shall possess on board a vessel, including charter vessels and pleasure craft used for fishing, halibut that have been filleted, mutilated or otherwise disfigured in any manner, except that each halibut may be cut into no more than 2 ventral pieces, 2 dorsal pieces, and 2 cheek pieces, with skin on all pieces.

The purpose of the regulation was to enable enforcement officers to determine compliance with maximum and minimum size limits and bag limit possession requirements. The enforcement concern was that allowing filleting at sea would prevent enforcement officers from determining either the numbers or lengths of fish. The existing regulation balances enforcement needs and utilization of harvested halibut most effectively for the majority of charter operations that harvest halibut at sea in a single day and return to process the

fish onshore or at a lodge. However, it is problematic for live-aboard vessel owners, unguided fishermen and multi-day charter operators.

In general, the 2018 regulatory proposals would create exceptions for live-aboard vessels or private pleasure craft with processing or preservation facilities. As explained by Andrew Cooper and Steve Riehemann in Proposals C2 and C4, the existing regulation does not provide adequate processing options for vessels that do multi-day trips or operate in remote areas far from port facilities. Three of the proposals suggest or specifically add reporting mechanisms to address enforcement needs, such as additional logbook data entry and photo documentation.

The IPHC has previously received regulatory proposals requesting changes to the regulation (2010 – 2012 meeting cycles), including earlier proposals from individual charter operators who conduct multi-day fishing trips or other vessel operators who deploy catcher vessels from one larger vessel that operates as a “floating lodge.” As explained in a regulatory proposal submitted by another multi-day charter operator in 2011, current regulation 28(1)(d) limits the processing options available to multi-day tour operators relative to charter operators that conduct daily trips. A particular problem shared by live-aboard vessel owners, private cruise vessels and multi-day tour operators is the inability to process and preserve halibut into meal-size packages.

The Boat Company would thus appreciate the IPHC moving forward with enforceable exceptions that include multi-day charter operators. An exception would be particularly useful if there was a small increase in the maximum size limit in future years or possibly even 2018. Specifically, the 2015 – 2017 maximum size limits of 42, 43, and 44 inches, respectively, are readily reduced to fletches as required under the regulation because they are small enough – about the size of a coho fillet – for standard vacuum packing. Even at this size, clients would prefer chunking but at least the processing is feasible onboard. But the Area 2C catch limits have gradually increased over the past five years such that it is possible to anticipate a 45 – 46 inch maximum size limit in the near future. This size limit is roughly the threshold at which onboard processing becomes challenging. 45 – 46 inch fish are roughly the threshold at which vacuum sealing is problematic and increased processing flexibility becomes necessary.

An improved regulation would identify and create an exception to the filleting prohibition for the three halibut resource stakeholders negatively affected by the filleting prohibition – (1) owners of live-aboard vessels; (2) private vessel owners with preservation facilities who do not return to port daily and (3) charter operators who conduct multi-day trips. The resource stakeholders share one

common feature – the ability to process and preserve (i.e. vacuum pack and freeze) halibut onboard. Thus, as suggested by Proposals C4 and C11, the regulatory language could identify halibut harvesters who qualify for the exception by focusing on the processing and preservation capacity of a vessel.<sup>1</sup>

The IPHC could then establish more rigorous reporting requirements to address the enforcement need to verify the number and size of halibut caught and possessed. Proposals C2, C9 and C11 identify potential reporting requirements that would address the enforcement need to determine the minimum size of number of fish. Anglers or multi-day charter operators would first maintain an additional log that identifies the date, time, location and measurement data (weight and/or length) of each halibut caught. They would then photographically document each fish, with processed fish packages marked to correspond to the log and photograph.

The Boat Company currently follows the suggested procedure by documenting each fish in a way that would enable enforcement officers to determine compliance with size and bag limits. Each fish is photographed and weighed, with the frozen fletches labelled by each client. The Boat Company also retains carcasses. In other words, if a regulatory change allowed The Boat Company to process halibut into more than four fletches, an enforcement officer could still weigh the marked pieces which would each correspond to a photograph and a specific carcass. For example, even allowing an option for seven pieces filleted in a specific manner, as is acceptable in Area 2B, would be an improvement.<sup>2</sup>

In sum, the current regulation assumes that sport fishing vessels return to port daily for processing. The Boat Company believes that it is possible for the IPHC to design a regulatory exception for sport-harvested halibut at sea and balance the enforcement need with additional reporting requirements that enable enforcement officers to compare marked halibut packages with logs, photographs or retained carcasses.

Thank you,

Paul Olson, Attorney-at-Law

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<sup>1</sup> Proposal C11 references “preserved fish” as defined in the Alaska Administrative Code at 5 AAC § 75.995(21).

<sup>2</sup> <http://www.pac.dfo-mpo.gc.ca/fm-gp/rec/finfish-peche-eng.html>

## Appendix II

**From:** [James Mackovjak](#)  
**To:** [Statements](#)  
**Subject:** comments on Patty Phillips's Nov. 2017 proposal to IPHC  
**Date:** Sunday, December 17, 2017 5:20:46 PM

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Alaska Halibut Forever  
Gustavus, Alaska  
c/o Judy Brakel  
P.O. Box 94  
Gustavus, AK 99826  
(907) 697-2287

### COMMENTS ON PATTY PHILLIPS'S NOV. 2017 PROPOSAL TO IPHC

Our Gustavus-based organization, Alaska Halibut Forever, is concerned about the impacts of unguided (self-guided) halibut sportfishing businesses on the halibut resource, communities, and other halibut stakeholders.

We support Patty Phillips's November 2017 proposal to the IPHC and have several comments to add to the discussion on that proposal. We believe that adopting Ms. Phillips's proposal and our additions to it (highlighted) would provide managers of Alaska's halibut fishery with essential information regarding the unguided halibut sport fishing effort and harvest. Thank you for your consideration. Please contact us if you have any questions.

#### TITLE: FOR UNGUIDED SPORT FISHING

Require logbook-style record keeping and reporting for certain unguided anglers in Alaska. It is a widespread practice of lodges or other businesses to equip unguided anglers with boats, gear, and local knowledge so the unguided angler can fish without the assistance of a licensed guide. There currently is no requirement for unguided anglers to report their sport fishing effort and harvest of halibut, thus it is difficult to assess any trends in effort and harvest.

#### Purpose and Need:

The growth of unguided halibut rental vessels, which are not constrained by a sector limit, has resulted in an increased halibut harvest. There is a need to identify and track unguided halibut rental vessels to better understand their impacts on the halibut resource, communities, and other halibut stakeholders. This information will help determine whether additional management actions are necessary for this segment of the fishery.

#### Suggested Regulatory Language:

Section 3. Definitions (u) "unguided angler" with respect to a person sport fishing for halibut, means an angler or anglers sport fishing from a vessel provided by a lodge or other business equipping angler(s) with boats, gear, and local knowledge for the angler(s) to sport fish without the assistance of a licensed guide.

Section 28. Sport Fishing for Halibut (4) For unguided angler sport fishing from a vessel provided by a lodge or other business in Regulatory Areas 2C and 3A:

1) Each unguided angler shall carry a Harvest Record on his or her person while fishing for halibut. Such harvest record must include:

- a) name of unguided angler
- b) state of residence of unguided angler
- c) Alaska sport fishing license number

- d) vessel license number or registration number
  - e) date(s) of sport fishing effort
  - f) ADF&G 6-digit Logbook Area in which sport fishing effort primarily occurred
  - g) catch per day
  - i) number of halibut and total estimated weight retained
  - ii) number of halibut released
- 2) The Harvest Record must be returned to the Alaska Department of Fish & Game within 10 days upon completion of angler fishing effort.
  - 3) No person shall make a false entry on the Harvest Record referred to in this section.

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James Mackovjak  
P.O. Box 63  
Gustavus, Alaska 99826  
home: (907) 697-2246  
cell: (541) 514-9145  
[lituya@gmail.com](mailto:lituya@gmail.com)

## Appendix III

**From:** [Leslie Pemberton](#)  
**To:** [Statements](#)  
**Subject:** Written comment from Puffin Fishing Charters  
**Date:** Monday, December 18, 2017 10:08:22 AM

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To IPHC members of the commission and staff,

My name is Leslie Pemberton and I co-own puffin fishing charters with Denise Hawks. I went to Dutch harbor, Alaska in 1974 when I was 19 to make money to go back to college and never left. I started working for fish processors and then eventually started working on fishing boats to acquire sea time for my captains license in 1979. Since then, have ran various types of vessels in the fishing charter and commercial fishing sector. We own and operate four mid size vessels and been fishing charters out of Seward for over 30 years. We are commercial ifq recipients that had bought 10,000 lbs of commercial ifq years ago and now have 2800 pounds of quota. We feel the pinch from both commercial fish and charter fish sectors.

We went to the NPMC advisory panel meeting in Anchorage, Alaska and the NPMC meetings the week of December 4 and it was obvious there are a lot of issues that need more time to be researched, analyzed and resolved.

We sense there is an urgency for something more tangible at this time. We understand Management Tools are needed to do our part to reduce our allocation in the charter sector. Therefore, we support additional Tuesday's no retention of halibut if needed along with the already pre existing additional restrictions. We feel this is enough to to bring us back down below our allocation for now. We support other restrictions once the other recommendations are analyzed and presented to the council in the future if needed.

We are conservation minded as a company. We are very concerned about our resource, and have taken steps with our clients to educate them on the changes with the halibut resource.

In the past, Alaskans were a large part of our client base. Most of our clients now are from the lower 48 and other countries. Gone are the days of filling their freezers for the locals. In the past, our clients came aboard expecting to catch two triple digit fish. We are now selling the fishing experience. We have lost most of our Alaskan clientele. Many Alaskan recreational halibut anglers has their own boats now or knows someone who does. This is an effective way to circumvent the restrictions effective on charter boats, especially the annual limit.

We realize there is a crisis in our halibut stocks and EVERYONE has to carry the burden.

Due to the drastic regulation changes in the charter industry in the last several years, the recreational anglers presence has increase substantially with many of them launching from Seward, Alaska and fishing our local waters. Not all of them are fishing halibut but a lot of them are. They are visually present on the grounds.

There is no way to know how far co-opting of vessels has gone in the recreational sector. All we have is antidotal evidence on an expanded fleet of mom & pops.

We are having a problem (with the recreational sector mostly in) the larger ports in area 3a Seward, Homer, Whittier with the increased recreational angler presence on the fishing grounds and something has to be done. They are pinging our spots, fishing those spots on our no halibut day, taking "friends" out on a regular basis. They are making a major impact on the halibut resource.

Now it's time recreational sector to do their part.

The recreational sector should be held to the same restrictions as the charter halibut industry.

It's imperative that all sectors, the recreational sector as well as trawl fishery work together to sustain our halibut resource.

The burden on conservation of the halibut resource should not fall on one or two user groups.

We are all in this together.

Commercial, charter, recreational, and trawl by catch.

We especially encourage reviewing further restrictions of reducing trawl by catch of halibut.

We also encourage you to review the residential recreational halibut charter fisher catch limit and the possibility that the restrictions for the charter sector coincide with the recreational sector.

We are presenting this issue to IPHC in hope that these two additional sector groups will also be included in doing their part to help sustain the resource.

This needs to be addressed as soon as possible.

Thank you for your consideration and attention in this matter.

Sincerely,

Capt. Leslie Pemberton

Denise Hawks

Puffin fishing charters

Seward, Alaska

Sent from my iPad

## Appendix IV

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**From:** Judy Brakel [<mailto:judybrakel@gmail.com>]

**Sent:** Tuesday, December 19, 2017 11:26 AM

**Subject:** Comment on a Proposal to IPHC

To the International Pacific Halibut Commission:

This is a comment in support of a proposal submitted by Patty Phillips for the Nov. 2017 and Jan. 2018 meetings. It is a comment in support of Patty Phillips' proposal titled "For Unguided Sport Fishing." Our organization, Alaska Halibut Forever" has suggesting some improvements to that proposal - see comment submitted by Alaska Halibut Forever. These suggested modifications would make the reporting of Self-guided halibut sport fishing parallel to the existing Charter Sport Fishing logbook system. Like the Charter logbooks, it would be limited to Areas 2C and 3A and it would require the same sub-area reporting.

At its early December 2017 meeting the North Pacific Fishery Management Council, responded to a Discussion Paper on the topic of Self-Guided halibut sport fishing. The NPFMC decided to undertake an expanded study of Self-guided halibut sport fishing businesses. See the NPFMC "C3 Motion" titled "Self-Guided Rental Boats," available on the NPFMC's December 2017 "Agenda." One of the Council's stated study objectives is finding means of estimating halibut harvests by clients of Self-guided sport fishing businesses. Passage of Ms Phillips' proposal, ideally with the modifications suggested by Alaska Halibut Forever, would constitute a valuable step forward in assisting this project. As well, it could encourage the Council's effort to assess the size and impacts of Self-Guided halibut sport fishing businesses.

Available information shows this new Self-guided sector expanding considerably, especially in Halibut Area 2C. Businesses have found a way to get around the requirement to have the NPFMC's Charter Halibut Permits (federal limited entry permits), and around the Charter clients' daily bag and size limits, etc., and around the Charter logbook reporting requirement. The halibut harvest of this growing sector comes off the top before the allowable directed catch is determined for Halibut Areas 2C and 3A under the Catch Sharing Plan installed by the NPFMC several years ago. This puts both the commercial setline fishery and the halibut charter sport fishing industry at a disadvantage. It also increases fishing pressure on near-shore halibut populations near Alaska coastal communities, making halibut less available as an important local food for these communities. Our community of Gustavus has watched this development with concern for the future of the resource.

Thank you for your attention.

Judy Brakel, Box 94, Gustavus, Alaska 99826 phone [907-697-2287](tel:907-697-2287) email [judybrakel@gmail.com](mailto:judybrakel@gmail.com)

## Appendix V

December 21, 2017

International Pacific Halibut Commission  
2320 W Commodore Way,  
Salmon Bay, Suite 300  
Seattle, WA 98199-1287

Dear Commissioners:

The Pacific Halibut Convention between the United States and Canada was signed in 1923 to administer the commercial fisheries for halibut between both countries. It wasn't until 1973 that the first regulations governing the sport fishery were drafted. It is time to recognize that commercial fishing and recreational fishing need different management protocols. We believe the sport fleet halibut fishery should be managed separately from the commercial, Alaska subsistence, and tribal/First Nation fisheries.

The International Pacific Halibut Commission (IPHC) currently sets harvest poundage quotas for the various halibut fisheries in the waters off the US and Canadian coasts. Areas 2A (Southern US) and 2B (Canada) have assigned quotas that are divided between sport, commercial, and tribal fisheries. In 2017, the 2A sport quota was 528,998 lbs and the 2B sport fishery had 1.117M lbs. In Alaska, the charter fleet had a 2.8M lb quota and the private boat fleet had no quota and took an estimated 2.8M lbs. We believe it is time to re-structure the sport halibut fishery to be managed on an equitable basis for both countries. We feel that it can be done on numbers of fish landed, not pounds landed. This can be done with a standardized season of February 1 to December 31; a daily bag limit of one fish; a field possession limit of two fish; and an annual limit of up to six fish.

Recreational halibut anglers are a critical component in the coastal economies of the US and British Columbia. They spend tens of millions of dollars which support many businesses from motels and gas stations to restaurants, grocery stores, bait dealers, fishing lodges, and tackle shops. Loss of halibut fishing opportunities can and is causing severe economic impacts to coastal communities in both countries.

A consistent season structure with a daily limit, a field possession limit, and an annual limit would have far reaching impacts not only for the coastal economies of our two countries but would also allow for a safer fishery. Assigned fishing dates have created a derby mentality, forcing anglers to go fishing when they shouldn't be on the water. Lives and property have been lost. First responders including the US and Canadian Coast Guard are put at risk when called out for search and rescue activities. Having an extended season would allow the sport angler to pick the days and sea/weather conditions for a safer fishery.

We would like to work with the IPHC, and the NPFMC, PFMC, and the Canadian DFO to establish regulations that would be consistent for the sport fishing communities of both countries starting with the 2019 season.

Sincerely,

David A. Croonquist

Sequim, WA

For the Olympic Peninsula Salmon and Halibut Coalition, Port Angeles Salmon Club, Puget Sound Anglers, Coastal Conservation Association, City of Port Angeles, Port of Port Angeles, Clallam County Commissioners, Port of Port Townsend, halibut anglers from Oregon and California, and coastal businesses with direct and indirect links to the sport fishing community.

## Appendix VI

IPHC

NPFMC at [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

To whom it may concern:

I am sending these comments in response to the discussions about the self guided sport fishing(recreational fishing) impacts and possible actions; the RQE CHP buy up, and the CHP latency potential and actions.

You have heard from me before, so what I have to say is not new. However as the issues and the myriad of scenarios become more complex and with continuous effort to regulate the next concern, it seems to me that there is a very simple fix.

Get rid of the CSP, the GAF, and anything else that connects recreational fishermen to commercial fishermen; make a separate recreational halibut fishing allocation; provide for accountability in that allocation(logbooks and punchcards); and regulate the participants of that allocation. I know this may seem to be going backwards on the road that we have all so laboriously decided to follow; however it is a better way.

Should you decide to do so; it nullifies the self guided advantage and impact on the halibut(all recreational fishermen would have the same rules); it simplifies regulatory rhetoric and paperwork; reduces enforcement confusion and costs; removes competitive issues between commercial fisherman and charter boat operators; and brings equity to all recreational users of the resource. It turns an RQE, if implemented, into a benefit to all recreational sports fishermen and it has no impact on the CHP(limited entry) requirement for charter boats but it does impact the latency issue of those permits by including all recreational fishermen in the allocation.

So again, I say, put all recreational halibut fishing into a single recreational allocation that is separate from the commercial allocation. Then use the science to regulate that allocation to be sustainable. Oh, and make the allocation equitable to the number of users.

And if we want to support the halibut resource even better, vote to implement Kent Huff's "Bycatch use in lieu of area IFQ for commercial fishermen" proposal.

Thankyou for your service on the council and thankyou for considering my comments. I welcome your feedback.

Sincerely,

James S Kearns

Comment on Regulatory Area 2A, 2B, 2C, 3A, 4A, 4B, 4CDE

Name : James Whitethorn  
Affiliation : West Brothers Group  
Address : Box 94  
City : Petersburg State/Prov. Alaska Zip Code : 99833  
Telephone : 760-464-1543 Fax : E-Mail :

Signature 

1) What is your recommended catch limit or proposal?

West Brothers Group recommends a total removal of 9.22 million lbs for the 2018 season for 2C. Same as 2016.  
The commercial catch would be 6.03 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 9.22 million and a commercial catch of 6.03 million.
  - b) We feel that our biomass is under estimated by 60 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 at 3lbs. In the total fisheries, don't seem to be showing up anywhere else. Also, the 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. (See attached Survey)
  - 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 0.5%, our commercial catch of 6.03 million is justified. We cannot figure out how we are responsible for 14% wastage because of coastwide average. How can we any better than 0.5% wastage. We think that the observer coverage

should match the bio-catch wastage of Halibut in each area. Let's solve the problem, where needed.

## 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)
- e) 2017 2C is about 250 lbs per skate

## 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.
- d) 2017 total removals for 2C were 7.04 million lbs.

- 4) If (by using area model) we take 75% of the 1995-2014 average of 10.96 Million lbs, we would harvest 9.22 million lbs of total removals.

- a) Total removals = 9.22 million
- b) Charter 16 to 17 % = 1.48 million
- c) Non Charter = 1.19 million
- d) Subsistence and Wastage = .26 million
- e) Total other uses = 2.93 million

- 5) 2016 Removals = 9.22 million
  - a) Minus other uses = 2.93 million
  - b) 2016 Commercial Catch = 6.03 million

6) Best fishing ever in 2C

- a) My personal catch was 380 skate in the 2017 season.

- b) Biggest average size at 31 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 9.22 million total removals would be a number that could be used for a long term without decreasing our survey.

f) This proposal 8.22 was passed by PAG in 2016 and not considered by  
The commission.

Thank You.



Release and Recovery location of Tagged Adult Halibut  
1925 -1976

Release Region	# Released	Bering Sea	Shumagin	Chitikof	Kodiak	Yakutat	South/East	Charlotte S.	Total	Unknown
Bering Sea	20,435	756	21	69	125	116	83	53	1223	40
Shumagin	5992	0	202	104	35	20	24	11	396	10
Chitikof	9193	0	37	473	91	20	17	10	648	31
Kodiak	16501	0	17	119	1294	40	36	25	1531	31
Yakutat	11431	0	31	122	428	1078	62	52	1773	5
South/Eastern	9729	0	0	0	1	4	1945	85	2035	46
Charlotte South	59361	0	1	0	7	39	194	17288	17529	254
<b>Total</b>	<b>132642</b>	<b>756</b>	<b>309</b>	<b>887</b>	<b>1981</b>	<b>1317</b>	<b>2361</b>	<b>17524</b>	<b>25135</b>	<b>417</b>

**Mostly Adult Halibut in this Survey**