

AGENDA D-2(h)  
OCTOBER 2013

COMMISSIONERS:

JAMES BALSIGER  
JUNEAU, AK  
DAVID BOYES  
COURTENAY, B.C.  
RALPH G. HOARD  
SEATTLE, WA  
PHILLIP LESTENKOF  
ST. PAUL, AK  
MICHAEL PEARSON  
OTTAWA, ON  
PAUL RYALL  
VANCOUVER, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

DIRECTOR  
BRUCE M. LEAMAN

2320 W. COMMODORE WY, STE 300  
SEATTLE, WA 98199-1287

TELEPHONE:  
(206) 634-1838

FAX:  
(206) 632-2983

July 25, 2013

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 West Fourth Ave, Suite 306  
Anchorage, AK 99501-2252

**RECEIVED**

JUL 29 2013

Dear Eric:

After some internal delay while we examined aspects of this issue, I enclose a letter from Mr. Melvin Grove on behalf of the Prince William Sound Charter Boat Association, which was reviewed by the Commission at its Annual Meeting earlier this year. In considering this letter and the accompanying testimony, the Commission concluded that the contention that catches outside of Prince William Sound (PWS) have negative effects on catches inside of PWS is not a stock management issue but one of allocation between gear sectors in the PWS area. As such, it is clearly the purview of the Council and the Commission forwards the letter for your consideration. The Commission notes that the National Marine Fisheries Service is currently in public comment period for the proposed Catch Sharing Plan which is intended to govern the commercial and charter halibut allocation within IPHC Regulatory Areas 3A and 2C.

The Commission staff did examine the catch data for the PWS area and the IPHC statistical areas immediately outside of the Sound (Fig. 1), in light of the concerns expressed about interactions between removals inside and outside of the Sound. We attach a table and figure showing commercial halibut landings from inside PWS (Areas 232, 242), outside PWS (Areas 230, 240), and for IPHC Regulatory Area 3A in total, for your information. In addition, we include the data presented by Mr. Grove for the Valdez charter fishery, which includes both inside and outside waters of PWS. Should you have any questions on this issue, the Commission staff would be happy to assist where possible.

Sincerely,



Bruce M. Leaman  
Executive Director

cc: Dr. James W. Balsiger, IPHC Chair  
Mr. Melvin Grove

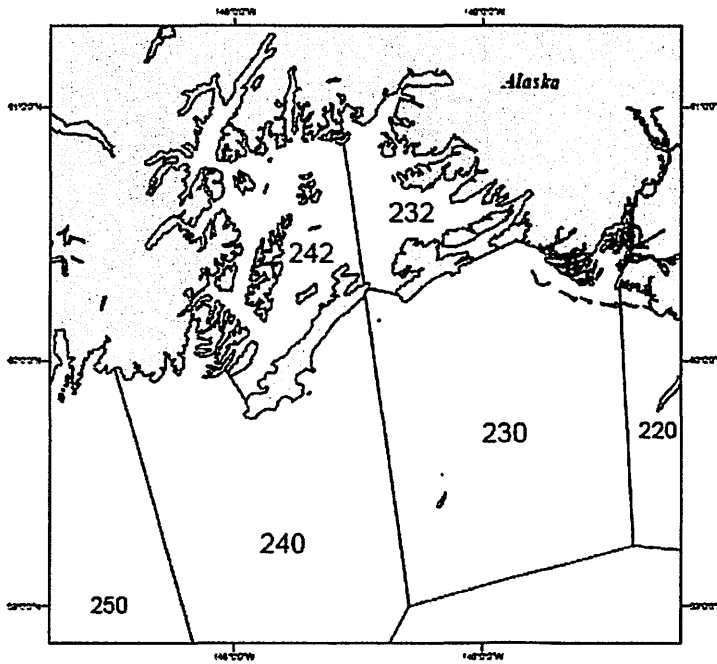
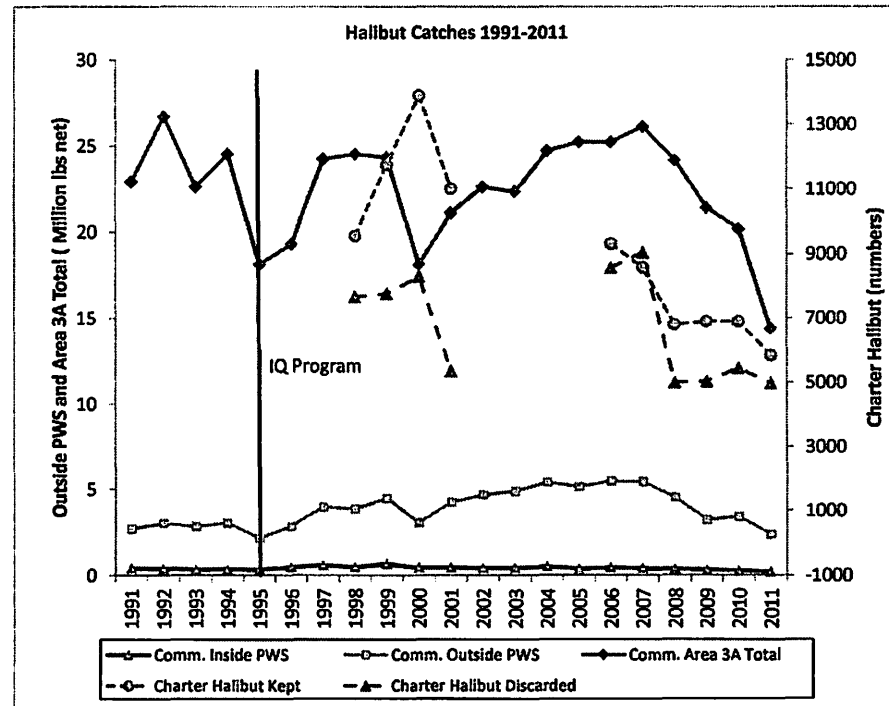


Figure 1. Statistical Areas near Prince William Sound. Areas 232 and 242 are 'inside' and Areas 230 and 240 are 'outside' in the accompanying data presentations.

Year	Commercial Landings <sup>1</sup>		"PWS" Area 3A Total		"PWS" Charter Fishery <sup>2</sup>	
	Inside PWS	Outside PWS	PWS Total	Area 3A Total	Charter Halibut Kept	Charter Halibut Discarded
1991	423594	2704573	3128167	22,912,619		
1992	395549	3045674	3441223	26,725,301		
1993	354038	2849351	3203389	22,606,774		
1994	364310	3056922	3421232	24,544,023		
1995	353840	2177135	2530975	18,136,028		
1996	489101	2861178	3350279	19,315,563		
1997	604821	3971381	4576202	24,244,013		
1998	483011	3863228	4346239	24,532,561	9545	7674
1999	676926	4469801	5146727	24,334,821	11745	7760
2000	459143	3067116	3526259	18,150,872	13894	8298
2001	456551	4233203	4689754	21,097,377	11005	5347
2002	424419	4676638	5101057	22,614,556		
2003	421302	4873456	5294758	22,330,127		
2004	514976	5398441	5913417	24,716,014		
2005	381109	5132308	5513417	25,227,938		
2006	456100	5472699	5928799	25,238,393	9318	8571
2007	426979	5442979	5869958	26,132,553	8580	9040
2008	378214	4518710	4896924	24,166,219	6793	4987
2009	328651	3224286	3552937	21,399,461	6896	5033
2010	274581	3409013	3683594	20,186,319	6890	5441
2011	202414	2384349	2586763	14,378,662	5839	4971

<sup>1</sup>Source: IPHC

<sup>2</sup>Source: Grove Letter



#6

# IPHC Catch Limit Comment Form

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

**Submission Information (Please print or type)**

<b>Name:</b> <u>Melvin B. Grove Jr</u>
<b>Affiliation:</b> <u>Prince William Sound Charter Boat Association</u>
<b>Address:</b> <u>PO Box 2850, Valdez Alaska</u>
<b>City:</b> <u>Valdez</u> <b>State/Prov.:</b> <u>AK</u> <b>Postal/ZIP Code:</b> <u>99652</u>
<b>Telephone:</b> <u>907-440-9148</u> <b>Fax:</b> _____ <b>Email:</b> _____
<b>Signature:</b> _____

1. **What is your recommended catch limit or proposal?**  
Establish a closed long-line halibut fishing period between Memorial Day and Labor Day in stats 240 and 230.

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

See attached letter.



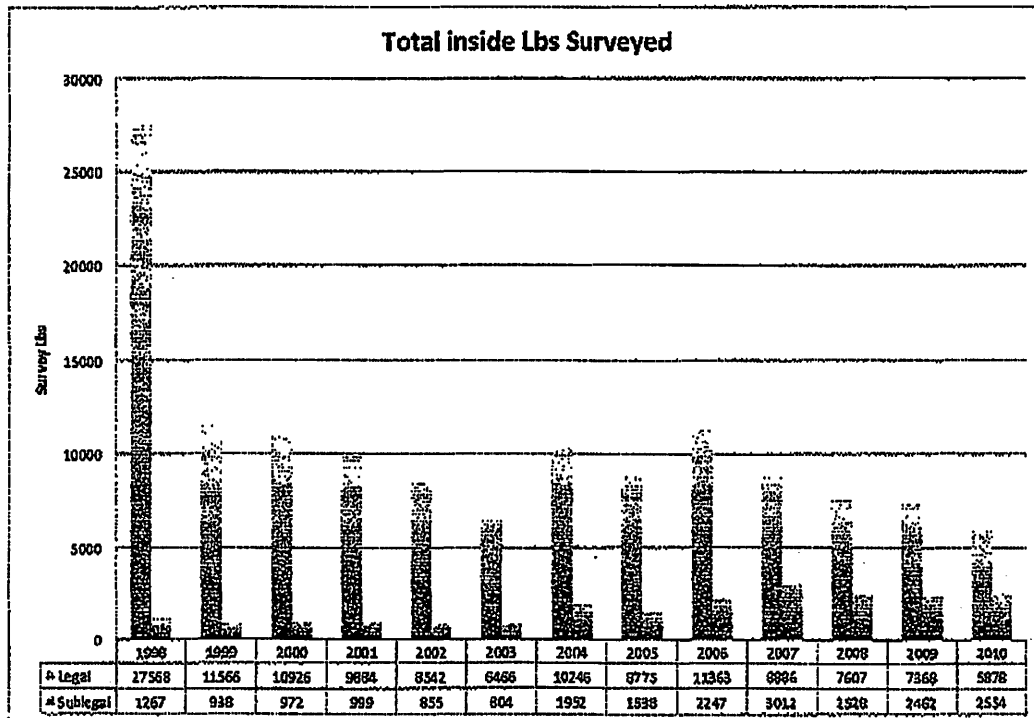
**PO Box 2850, Valdez, Alaska 99686**

December 24, 2012

IPHC  
 2320 West Commodore Way, Suite 300  
 Seattle, WA 98199-1287

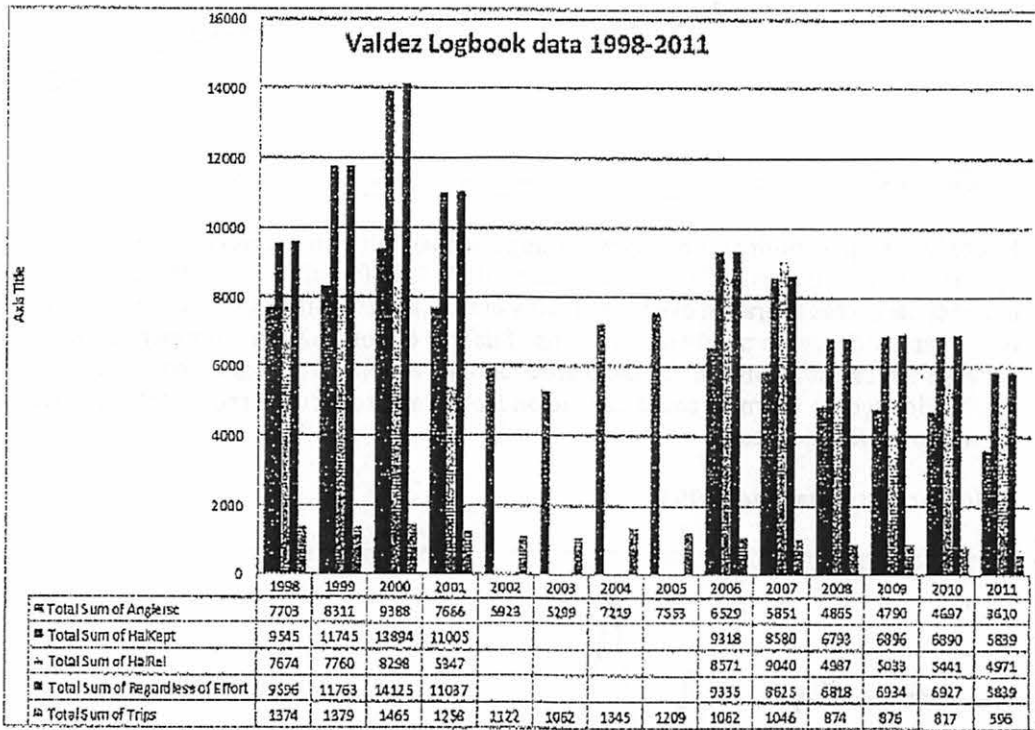
Comment: Area 3A Catch Limit

The members of the Prince William Sound Charter Association (PWSCBA) support the IPHC recommended 3A harvest limits for 2013. PWSCBA also request that the IPHC take immediate steps to diagnose the dramatic decrease in harvest opportunity within PWS since the implementation of the Individual Fishing Quota (IFQ) implementation. Since the implementation of the IFQ system, commercial harvest has been concentrated in the central AK Gulf stats outside PWS and we believe the concentrated effort has decreased fishing opportunity within PWS. The perception of fewer fish inside PWS could very well be reality based on IPHC survey catch data for PWS stats 232 and 242.

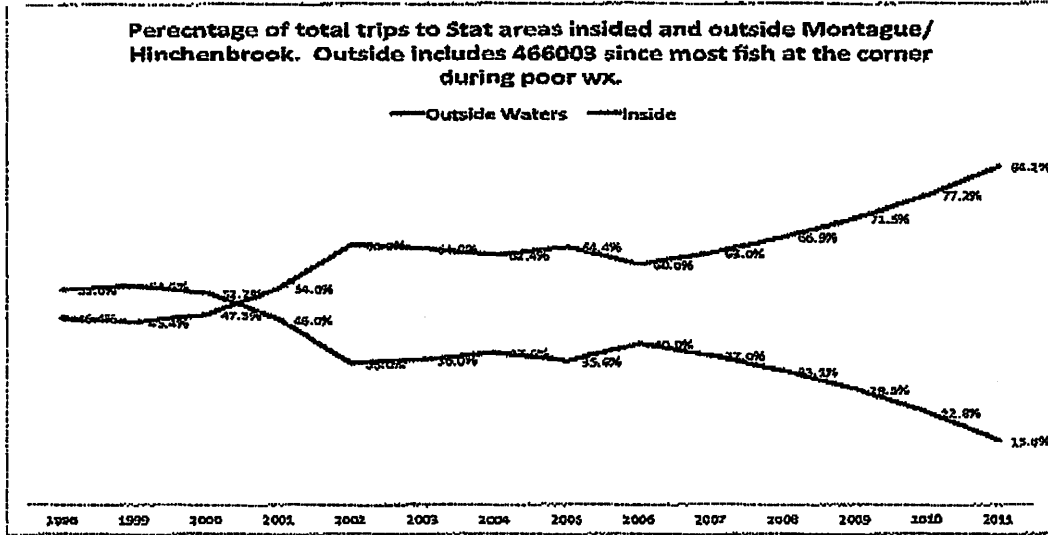


Shortly following the IFQ program, the Valdez charter fleet has dramatically declined from a high of providing 9388 angler days with 1465 trips in 2000 to a mere 3610 angler days with 596 trips in 2011. At today's average charter price of \$340/person, Valdez has lost \$1,964,520.00 in gross annual charter sales alone not including the economic impact the loss of over 5,000 anglers brought to the remaining businesses in Valdez. Numerous businesses have failed and closed their doors since 1995 to include a once successful tackle shop and marine supply store. Why has a once great sport fishing destination slowly died?

AK F&G Logbook data provided by Scott Meyer

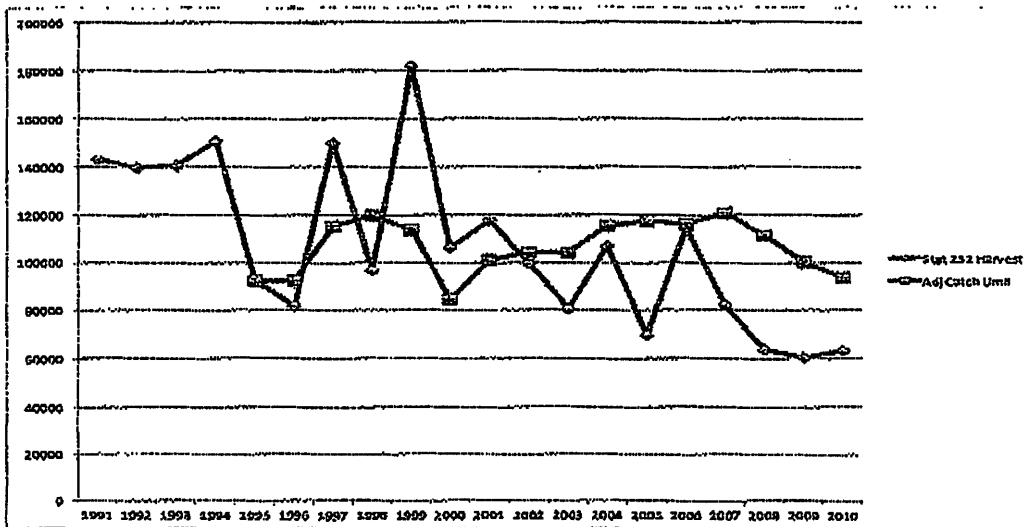


We believe Valdez has lost fishing opportunity as a result of the continual long-line pressure throughout the summer months and the increased amount of quota taken within the PWS stat fishing grounds, primarily in outside stats of 240 and 230. To have the reasonable opportunity to harvest two fish or any fish, the guided and unguided anglers now must travel to the Gulf and assume more risk, consume more resources, and expend much more effort. Before the IFQ system, it was unnecessary to travel to the Gulf to catch fish and very few ever went past the entrance to harvest halibut. In 1998, after the logbook program started less than 50% traveled to the Gulf. In 2011 84% of the charter trips were logged in outside waters of PWS. The reasonable opportunity to harvest two fish near Valdez is so poor that charters now cancel unless weather conditions only allow fishing in the Gulf, a 2.5 hour run for the even fastest boats, and forego \$30,000-40,000 annually in possible revenue.



Not only has opportunity for the sport fishing declined but also so has commercial opportunity in stat area 232 for inside waters of PWS. Before the IFQ implementation the commercial sector averaged over 140,000lbs of halibut in less than two 24-hour openers each year. Today, with nearly nine months of fishing opportunity the commercial sector harvests a mere 60,000lbs in the same area. A once well-protected area from poor weather that Valdez sport fisherman could depend on isn't even producing a reasonable opportunity for the commercial sector.

**IPHC Harvest Data since 1991**

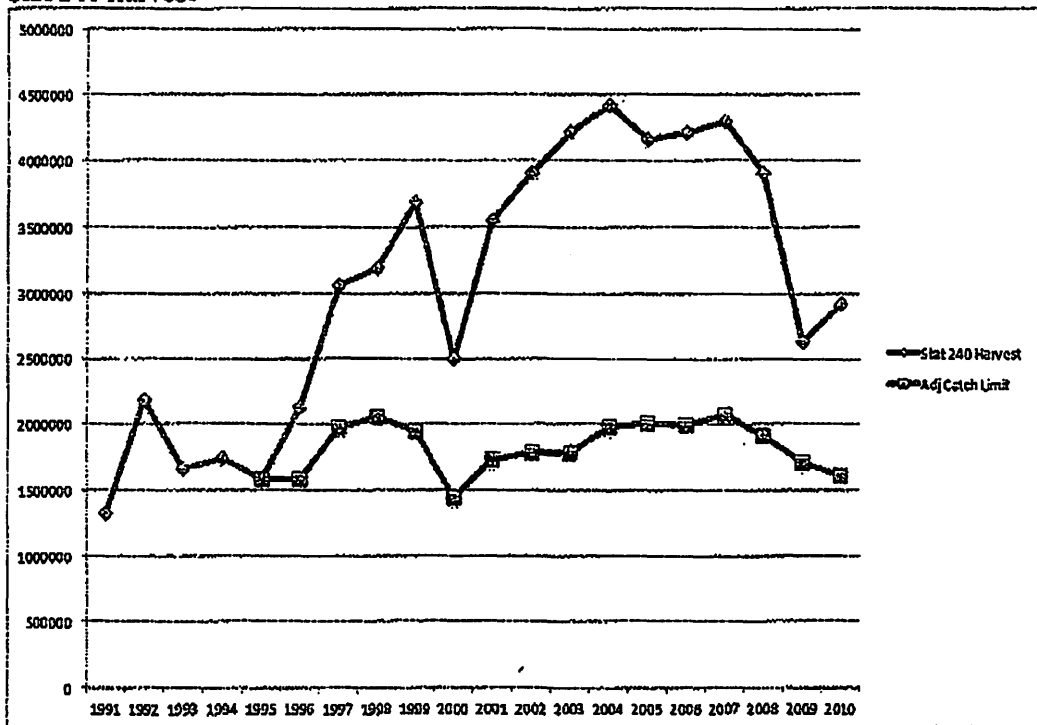


*Note: The adjusted catch limit is a graph of harvest limit based on the amount of harvest in each stat area with given annual IPHC increases. A theoretical harvest amount if the same amount of quota fished in the stat in 1995 changed only based on IPHC increases*

Why has fishing in stat area 232 declined? We believe the reason is the increasing and continual pressure applied by the commercial sector in areas outside PWS and interception

along migration routes. The amount of fish harvested in outside stats like 240 has nearly tripled in some years since IFQ implementation and when all PWS stat areas are combined the harvest has over doubled since the IFQ program started.

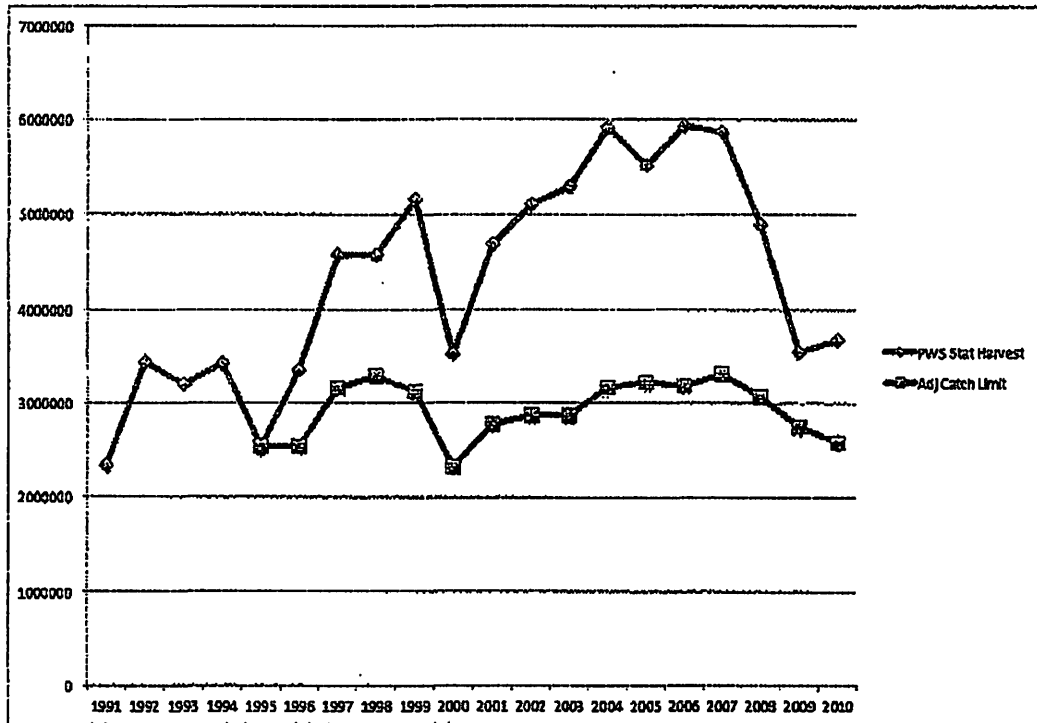
Stat 240 Harvest



Note: The adjusted catch limit is a graph of harvest limit based on the amount of harvest in each stat area with given annual IPHC increases. A theoretical harvest amount if the same amount of quota fished in the stat in 1995 changed only based on IPHC increases



### Total PWS Commercial Harvest



*Note: The adjusted catch limit is a graph of harvest limit based on the amount of harvest in each stat area with given annual IPHC increases. A theoretical harvest amount if the same amount of quota fished in the stat in 1995 changed only based on IPHC increases.*

As a result of the IFQ program and the CHP, the Valdez charter fleet has harvested 50% less fish than they were between 1998-2000. We have lost over 50% of the fleet and an economic impact to Valdez of well over \$2 million annually. Fisheries management has played economic Russian roulette with halibut charter fleet in Valdez and most have lost. To potentially improve harvest opportunity inside PWS we support the IPHC lower catch limits in all of 3A in 2013. As an alternative to lowering the entire limit in 3A, we request that the IPHC research or consider the following management measures within the PWS stat areas.

1. Establish and overall PWS stat area harvest quota.
2. Establish closed commercial long-line operation periods (Memorial Day-Labor Day) in stats outside PWS to allow more migration inside.

We believe Option #2 would benefit all sectors by allowing more halibut migration within PWS. This option would reduce risk and cost for all sectors and improve harvest opportunity inside PWS.

Melvin B. Grove Jr  
President PWSCBA