

# IPHC Regulations Proposal Submission Form

Proposal Title: Request State of Alaska to develop a harvest tag data collection for all recreation harvest of Halibut in Alaska

Year Proposed For: 2009 and beyond

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

Name: Ronn Buschmann

Affiliation: Self

Address: \_\_\_\_\_

City: Petersburg State/Prov: AK Postal/ZIP Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: 

**1. What is the definition and objective of the proposal?**

The objective of the proposal is to get a full accounting of all halibut harvested by the recreational sectors (guided & unguided) in Alaska. With the Southeast Stocks showing signs of distress, (fishing intensity; declining CPUE indices; truncation of age distributions) it is important to know with accuracy all removals. IPHC is trying to set appropriate catch limits to reverse declines and rebuild the stock. It is critical in the rebuilding of stocks to have an accurate estimate of all removals from the area. Many believe that the current method of the SWHS is underestimating the harvest of the "assisted un-guided (lodge derived charters with no guide)" and that this category of removals will be increasing as a one fish bag limit in SE and the halibut limited entry program are implemented. Harvest tickets are used throughout the country successfully on both fishery species and game species as a method of collecting information about the harvest.

The IPHC Commissioners would request the Alaska Dept of Fish and Game and/or National Marine Fisheries Service to develop a harvest ticket/tag program for ALL recreational anglers (guided & unguided) that provides for the marking of the halibut carcasses as caught, a label that marks fish as it is being shipped with the tag number of the halibut harvested in the container/box and the reporting of the fish through phone, internet, drop box or mail. The harvest ticket/tag would require the whole fish length in inches to be noted. Number of tag would be logged in the logbook on any guided charters.

**2. Impacts: Describe who you think this proposed change might affect (include fishers, processors, agencies, and the public).**

**2a. Who might benefit from the proposed change?**

The resource will be the biggest beneficiary of a recreational angler harvest tag/ticket because managers will have an accurate record of all removals. Commercial fishermen already have an accurate electronic reporting system.

**2b. Who might suffer hardships or be worse off?**

Those who don't like additional paperwork requirements and there will be additional agency cost to develop, implement and run the harvest ticket program.

**3. Are there other solutions to the problem described above? If so, why were they rejected?**

Current system of estimating recreational harvest while it is all we have, it is not considered by most to be an adequate estimate of recreational harvest, we would like something different implemented. A logbook program for the unguided recreational angler is not a likely scenario.

Please attach any other supporting materials. All items submitted by **October 31, 2008** will be considered at the IPHC Annual Meeting. ***Remember to include contact information and signature.***

10/22/2008

**Proposal: Allowing the retention of coincidentally harvested Halibut during the Bering Sea Sablefish Pot Fishery**

**Year(s): Effective spring 2009, for a three year trial/evaluation period**

**Definition and Objective:**

This proposal is to allow the retention of incidental by catch Halibut, specifically caught in the Bering Sea Sablefish fishery, by pot, by qualified harvesters that have 4A Halibut quota. This proposal is very much the same as the recently passed regulatory change in area 2B. There are 3 primary objectives to this proposal. 1) Increase the area of harvest in 4A, 2) reduce mortality from Killer whale predation and handling, and 3) Reduce concentrated harvest in traditional "whale-free" areas.

1) Currently there is a very large portion of 4A that is not reasonable to attempt harvesting Halibut from because of Killer whale predation. Pots have been successful in safely capturing these fish, with no mortality from predation.

2) Under the current regulations, all Halibut caught by Sablefish pots must be discarded. Because of where the majority of the Bering Sea Sablefish Pot fishery is conducted, there is a constant presence of Killer whales near harvesting vessels. There is no mechanism by which halibut can be safely returned, without extremely high mortality. Mortality from handling would be completely eliminated.

3) Because of the increased presence of Killer whales in 4A, harvesters have been forced into ever increasingly small areas of harvest, with limited windows of opportunity to harvest. Allowing these specified pot vessels to retain their by-catch reduces both pressure on the resource and direct competition between vessels, lessening focused impact on the resource, and significantly increasing the area of harvest.

**Impacts:**

All vessels fishing with hooks will see some small measure of relief from this proposal, simply because: a) some of the fish would, with this proposal, be harvested from regions that are not being currently exploited, b) Halibut caught by pot, landed and recorded, would directly increase the availability, by reducing competitive pressure, and direct and indirect mortality issues

**Opinion:**

We have had 7 years of Sablefish fishing, by pot, in the Bering Sea to witness changing events. The Killer whale predation problem is increasing. Cows are teaching their calves the "technique" of stripping fish and following in to snatch by catch as quickly as it is discarded. When we discard Halibut, we are destroying the fish. We can't change the whales feeding habits, but we can change their access to Halibut in particular. I believe all vessels engaged in Sablefish fishing in the Bering Sea should be required to have some Halibut quota for 4A, specifically to cover the inevitable by catch of Halibut.

For a significant portion of the year, Halibut and Sablefish share intermingled climes on the ocean bottom. Traditional halibut surveys do not get to these regions. To pursue Sablefish will forever take us through regions of Halibut as the two species compete for food. Recognizing this interrelationship, I am proposing that we retain both.

February 6, 2009

Mr. Eric Olson  
Chairman  
North Pacific Fishery Management Council  
605 West Fourth Avenue, Suite 306  
Anchorage, Alaska 99501

Dear Mr. Chairman:

It has come to the attention of the undersigned groups that the Council may be asked to form a Stakeholders Committee to consider long-term solutions for the guided recreational halibut fishery. As groups that represent many charter operators who participate in the guided recreational fishery, we would like to ask that the Council not form such a committee at this time.

While we support the idea of having stakeholders actively involved in crafting solutions that will affect their particular fishery, we feel that it would be pre-mature to undertake such an effort at this time for the guided recreational halibut fishery. In addition to the one halibut daily bag limit for Area 2C that is currently before the Secretary, the Council has two requests for rulemaking in process, on the charter halibut moratorium and the Catch Sharing Plan, and both of these measures will have a significant impact on the guided recreational sectors in Areas 2C and 3A. Until the charter sector has a better understanding of what the final implementation of these three rulemakings will look like, and how they will affect the guided recreational fishery in both Areas, it is difficult for the charter sector to come to agreement on a long-term solution. In addition, the work of the previous Charter Halibut Stakeholder Committee, which charter operators participated in at considerable time and expense, has not been fully evaluated or considered by the Council.

Charter operators are already being hard hit by the economic downturn. We do not think at this time that it would be productive to have to expend further resources coming to Stakeholder meetings when there are too many variables that have yet to be resolved. Once the outcome of the pending Council actions is better known, then we believe that a new Stakeholders process could be both productive and beneficial.

Thank you for considering our request to postpone forming a new Stakeholder Committee until a later date.

Respectfully,

Alaska Charter Association / Charter Halibut Task Force / Juneau Charter Boat Operators Association / Ketchikan Guided Sportfish Association / Kodiak Area Charter Operators / Petersburg Charter Boat Association / Prince William Sound Charter Boat Association / Sitka Charter Boat Operators Association / Southeast Alaska Guides Organization