



Stakeholder statements on regulatory proposals for 2019

PREPARED BY: IPHC SECRETARIAT (21 DECEMBER 2018, 18 & 28 JANUARY 2019)

PURPOSE

To provide the Commission with a consolidated document containing ‘Statements’ from stakeholders submitted to the Commission for its consideration at the 95th Session of the IPHC Annual Meeting (AM095).

BACKGROUND

During 2018, the IPHC Secretariat made improvements to the [Fishery Regulations](#) portal on the IPHC website (announced via [IPHC News Release 2018-021](#)), which includes instructions for stakeholders to submit statements to the Commission for its consideration. Specifically:

“Informal Statements by stakeholders should be submitted as an email to the following address, secretariat@iphc.int, which will then be provided to the Commissioners as Stakeholder Statements at each Session.

DISCUSSION

[Table 1](#) provides a list of the Stakeholder Statements received by 27 January 2019, which are provided in full in the Appendices. Note that the first seven Statements were available for the 94th Interim Meeting (IM094). The IPHC Secretariat does not provide commentary on the Statements, but simply collates them in this document for the Commission’s consideration.

Table 1. Statements received from stakeholders by 27 January 2019.

Appendix No.	Title and author	Date received
Appendix I	Regulation statement by Bill Connor	17 October 2018
Appendix II	Regulation statement by Bill Connor	17 October 2018
Appendix III	Regulation statement by Tony Pettis	19 October 2018
Appendix IV	Regulation statement by Mike Banks	21 October 2018
Appendix V	Regulation statement by John Little	24 October 2018
Appendix VI	Regulation statement by Marc Schmidt	29 October 2018
Appendix VII	Regulation statement by Thomas Germain	6 November 2018
Appendix VIII	Regulation statement by James Kearns	27 December 2018
Appendix IX	Regulation statement by the Humboldt Area Saltwater Anglers	28 December 2018
Appendix X	Regulation statement by Harrison Ibach	28 December 2018
Appendix XI	Regulation statement by Marc Schmidt	28 December 2018
Appendix XII	Regulation statement by Tom Marking	28 December 2018
Appendix XIII	Regulation statement by Denny Corbin	29 December 2018
Appendix XIV	Regulation statement by Tom Burlingame	14 January 2019

<u>Appendix XV</u>	Regulation statement by the Jamestown S'Klallam Tribe	14 January 2019
<u>Appendix XVI</u>	Regulation statement by the City of Forks	15 January 2019
<u>Appendix XVII</u>	Regulation statement by the Ilwaco Charter Association	15 January 2019
<u>Appendix XVIII</u>	Regulation statement by the Swinomish Indian Tribal Community	16 January 2019
<u>Appendix XIX</u>	Regulation statement by the Port Gamble S'Klallam Tribe	16 January 2019
<u>Appendix XX</u>	Regulation statement by the Suquamish Tribe	17 January 2019
<u>Appendix XXI</u>	Regulation statement by the Lower Elwha Klallam Tribe	17 January 2019
<u>Appendix XXII</u>	Regulation statement by Robert Greenfield	17 January 2019
<u>Appendix XXIII</u>	Regulation statement by the Lummi Nation	17 January 2019
<u>Appendix XXIV</u>	Regulation statement by the Puget Sound Anglers State Board	18 January 2019
<u>Appendix XXV</u>	Regulation statement by the Westport Charterboat Association	18 January 2019
<u>Appendix XXVI</u>	Regulation statement by the Coast Trollers Association	19 January 2019
<u>Appendix XXVII</u>	Regulation statement by Joel Kawahara	22 January 2019
<u>Appendix XXVIII</u>	Regulation statement by the Quinault Indian Nation	23 January 2019
<u>Appendix XXIX</u>	Regulation statement by the Olympic Peninsula Guides' Association	25 January 2019
<u>Appendix XXX</u>	Regulation statement by the Washington Department of Fish and Wildlife	25 January 2019
<u>Appendix XXXI</u>	Regulation statement by the Oregon Coast Charter Association	25 January 2019
<u>Appendix XXXII</u>	Regulation statement by the Oregon Department of Fish and Wildlife	25 January 2019
<u>Appendix XXXIII</u>	Regulation statement by the Recreational Fishing Alliance, Oregon Chapter	26 January 2019
<u>Appendix XXXIV</u>	Regulation statement by the Quileute Tribal Council	27 January 2019

APPENDICES

As listed in [Table 1](#).

APPENDIX I

Regulation statement by Bill Connor

From: crfbc@aol.com <crfbc@aol.com>
Sent: Wednesday, October 17, 2018 7:40 AM
To: IPHC Secretariat <secretariat@iphc.int>
Cc: crfbc@aol.com
Subject: Regulation Statement

To the IPHC commission,

I would like to propose a year round fishery for Pacific halibut.

We are experiencing an increasing rise of quota from east coast halibut, it is a year round fisheries and it will continue to erode our frozen markets and fresh markets. This will cause the price of pacific halibut to continue to fall from our current pricing.

By having a year round fishery we will be able to market pacific halibut year round thus saving the frozen fish alternative which we have heard from all processors that it is a losing product form. This has caused a steep price reduction over this season.

Fishing halibut for 40 years I have seen spawning halibut throughout the opened season.

To do nothing and stay status quo we will continue to lose market share and price stability.

Bill Connor

APPENDIX II

Regulation statement by Bill Connor

From: crfbc@aol.com <crfbc@aol.com>
Sent: Wednesday, October 17, 2018 7:49 AM
To: IPHC Secretariat <secretariat@iphc.int>
Subject: Regulation Statement

To the IPHC commission,.

I would like to propose a size limit to halibut marketed in the United states.

With the farmed halibut coming on line, to protect our resource and markets we should have a minimum market size to match the commercial size limit of 32 inches.

This would keep all sales of halibut above board avoiding product from other countries harvesting smaller fish, or farmed fish less than 32 inches from being sold into our markets, undermining our commercial size, and possibly pirated fish from our stocks entering our market place.

Bill Connor

APPENDIX III

Regulation statement by

From: Tony Pettis <emailtonypettis@gmail.com>
Sent: Friday, October 19, 2018 7:48 PM
To: IPHC Secretariat <secretariat@iphc.int>
Subject: Regulation Statement

This comment is in regards to the IPHC proposal to extend the 2A halibut season to 5 or 10 days.

My name is Tony Pettis. I own and operate the fishing vessel Heidi Sue out of Newport, OR and have been halibut fishing in area 2A for 20+ years.

I believe this is a bad idea for many reasons.

First of all, I believe this would increase the amount of halibut discard when more boats caught their full quota and were required to discard their overage. It could also attract more "new" longliners that would be more likely to lose gear or waste fish while discouraging professional longliners to take the time to participate in a fishery with reduced quotas that took more time away from other potential fisheries.

In my opinion, the 5 to 10 day season would be the worst possible scenario because the quota would be much lower, but a fisherman would still be required to miss other opportunities in order to fish halibut at a certain time. I would have a difficult decision as to whether or not it would be worth my time away from other fisheries to fish for halibut. This seems like a sad scenario after 20+ years of halibut fishing.

I believe there are two viable options that could improve the 2A halibut fishery.

The first option would be to leave the 10 hour season structure in place but move the season dates at least one month earlier. If the seasons started in mid May, there would be more halibut outside the rca in more areas which would result in higher catch rates, less crowding, and less localized depletion. Another huge benefit to fishing earlier would be fishing before blue sharks arrived. There would be much less shark bycatch and much less lost gear (and wasted halibut) that was bit off by sharks.

Another option would be to set up a IFQ system for 2A similar to Alaska. I along with a small group of other professional longliners from Newport have submitted an IFQ plan that we support. The plan we submitted details the many benefits we see, so I won't go into those details here.

Again, I would like to emphasize that I believe a 5 or 10 day season structure would be the worst possible scenario. The worst of both worlds with the inconvenience of having to cater to a short season and miss out on other fisheries, and much reduced possible reward.

Thank you for your time and consideration.

Tony Pettis
F/V Heidi Sue

APPENDIX IV

Regulation statement by Mike Banks

From: IPHC Web Form <IPHC_Web_Form@emailconfirmationdelivery.com>

Sent: Sunday, October 21, 2018 6:50 PM

Cc: IPHC Secretariat <secretariat@iphc.int>

Subject: web form: Contact IPHC

Name Mike Banks
E-mail mkbanks292@gmail.com
Subject RE: Directed 2A proposed changes
Message We have been involved in the Directed 2A fishery for decades in multiple boats (owner/operator). Twenty to twenty-five years ago the sport guys were organized and were trying to eliminate the fishery in 2A. At one of the IPHC meetings that I attended we agreed that we would let the sport guys go first and get the bulk of their quota, starting near the beginning of May, and the commercial guys would go near the end of June. That eliminated a lot of conflict. It may cause problems to move our start date earlier. Something to consider. Mike Banks 360.590.0954

APPENDIX V

Regulation statement by John Little

From: IPHC Web Form <IPHC_Web_Form@emailconfirmationdelivery.com>

Sent: Wednesday, October 24, 2018 4:54 PM

Cc: IPHC Secretariat <secretariat@iphc.int>

Subject: web form: Contact IPHC

Name	John Little
E-mail	retiredteacher@hotmail.com
Subject	sport caught halibut
Message	If you really want to be a hero, figure a way for those of us who live on their boat to cut halibut into freezer size pieces on board. Those fillets are mighty big to use when it is time to cook and serve.

APPENDIX VI**Regulation statement by Marc Schmidt**

Name	Marc Schmidt
E-mail	freelmagic@gmail.com
Subject	Considerations for small boats in 2A directed commercial fishery
Message	<p>Hello IPHC, I am one of the very few participants with multiple landings in the directed commercial fishery in CA. I have been pursuing this fishery with investments in time, gear, and risk to my vessel and my well being while fishing, or attempting to fish, the derby openers in my 26 ft boat for the last 7 years. I am a huge proponent for a longer period over the current 10hr opener but am greatly concerned the quota for my size class boat (B - 26ft) will get its quota chopped to just a couple or few hundred lbs and not be worth my time. The industry seems to cater to the big boats, which are needed, but it is very frustrating to be trying to make a living fishing when there is no regard for us small boat operations. We need a good payday every once in a while also. I feel there should be the same boat quota for all boat classes for the first (possibly more) open period (say of 1500-3000 lbs) or at the very least a minimum of 1000lbs on the first opener for all boat sizes. I understand the need for reduced quota in additional open periods if we were to see them. I feel a 5 day season is still putting fishermen in a derby situation and 10 to 21 days is getting to be where safety, efficient fishing, and available markets are considered. Thank you for your time, Marc Schmidt F/V Reel Magic Eureka, CA</p>

APPENDIX VII

Regulation statement by Thomas Germain

From: Thomas Germain <tomgermain@hotmail.com>

Sent: Tuesday, November 6, 2018 7:35 PM

To: IPHC Secretariat <secretariat@iphc.int>

Subject: Informal Statement by stakeholder - for the 94th Session of the IPHC Interim Meeting (IM094)

IPHC-2018-IM094-INFO2 provides no resolution

The report IPHC-2018-IM094-INFO2 – “2018 IPHC Regulatory Proposals referred to a Working Group of IPHC Contracting Parties”. Was created by “Representatives of NOAA Fisheries Alaska Region Office, NOAA Office of Law Enforcement, and NOAA General Counsel met with the IPHC Secretariat as a working group on 25 September 2018 to discuss the deferred regulatory proposals.”

There is an issue with the group that was convened, there is no incentive of any party in the group to come up with a solution that allows the sensible retention of Halibut by Cruising/Live Aboard Vessels. It is not in the groups interest to help resolve the issue but to allow the issue to continue to discriminate against the small number of people affected.

The Working Groups recommendation to not accept any of the proposals, or to recognize the possibility of a combination of these proposals will leave the regulation unchanged. The proposals listed a variety of reasons that the issues need to be addressed.

Reasons listed on the proposals:

1. Current regulations assume that sport fishing vessels return to port each day for processing of their catch. Live-aboard vessels are often operating and fishing in remote areas or where limited port facilities offer no options for proper preservation or shipment of their catch.
2. The current regulations (specifically the Pacific Halibut Fishery Regulations 2017 section 28d) do not allow for proper processing and preservation of the catch on board any vessel. This discriminates against citizens that live on their vessels.
3. It contradicts ADF&G regulations by promoting waste.
4. It is illegal to cut off a portion of a fletch and have it for dinner.
5. It is illegal to buy halibut in town and take it on a cruising trip (unless someone sells whole fletches with skin on) (By the letter of the law, you can not bring it on board while in port tied to the dock)
6. To properly store halibut for long term preservation one needs to cut filets into more than 4 pieces (skin on tends to taint the flesh over time) as “meal size” is approximately 1 lb.

The reason given by the Working Group for its recommendation to not accept any of the proposals is difficulty in enforcement of the daily or possession limit.

The difficulty with enforcement is caused by the federal definition of possession and the fact that it only applies to salt waters. For all other fish in the state of Alaska the definition of Possession Limit is “POSSESSION LIMIT—the maximum number of unpreserved fish a person may have in possession.” This allows processing on board a cruising vessel.

If these proposals were combined and a couple of easy additions made, the enforcement would be much easier than the enforcement of people who catch a limit early in the morning, return to a town/remote cabin and leave their catch at home, return to fish that afternoon. There are a lot more people with the opportunity to break

the law in that manner, as the enforcement is impossible with the regulation only applying to salt water, then there are people who are on extended trips with the proper equipment onboard to process halibut.

I would request that before the Commission walk away from these proposals that they consider that the current regulations do nothing to promote enforcement of the larger potential issues but do discriminate against a few law abiding citizens who care enough to try and get the regulations changed.

Suggestions from the proposals to allow on board processing:

1. No fishing allowed once processing has begun for the day (More enforceable than people living in town making two trips in a day)
2. Photos with date stamps, dates and markings on packages
3. Recording the fish, size, location and date (Already done for multiple other species for season and daily limits)

Additional options:

1. All carcasses must be kept on board until processing is complete
2. No fishing allowed until halibut is completely frozen to a hard condition (easily enforceable and delays fishing enough to protect against cheating the dates on packages)

Please recognize that this is a huge issue for a very small portion of the sport fishing population. This represents a very small portion of the sport fish catch which would have little to no impact to the Halibut resource if it was difficult to enforce.

If the Commission can not accept any form of the proposals, the least that would be a responsible way forward would be to have the Working Group reconvene with representation from some of the people affected by the regulation, maybe some of the people who wrote the proposals.

Tom Germain

tomgermain@hotmail.com

APPENDIX VIII**Regulation statement by James Kearns**

Requested By: James Kearns

Requester E-mail: jim@fairweatheradventures.net

Date Requested: 12/27/2018

IPHC Regulatory Areas that may be affected: All AK

Fishery Sectors: (field not answered)

Explanatory Memorandum:

James Kearns Dec 26, 2018, 10:18 AM (22 hours ago) to Regulation I am writing to propose a change to the current status of the recreational halibut fishery in Alaska. In the past I have encouraged this commission as well as the NPFMC to consider recreational fishermen as a single group rather than separating them into guided and unguided sectors. This is now more important than ever as halibut resources are becoming more threatened than ever and unguided recreational fishermen continue to harvest at pre-regulation levels with somewhat poor accountability for the number of halibut taken. The NPFMC is discussing new regulations aimed at rental unguided fishing businesses and fishermen. There is no doubt that recreational halibut fishermen need to do their part in conserving and maintaining a sustainable halibut resource. But I do not believe that more regulation is the answer. I purpose that we make it simple and lump all recreational fishing into a single group with one set of simple, easy to understand, and easy to enforce regulations designed to keep the recreational harvest within a separate recreational allocation. Therefore I am asking that this commission recommend to the Secretary of State, the Secretary of Commerce, the NPFMC, and any other halibut resource managing regulatory agency, that they simply change the current system and manage the total allowable catch with 3 separate allocations: one for commercial fishing, another separate recreational allocation for all recreational fishermen, guided or non-guided, and one for subsistence. And further I ask that you recommend a commercial 65%, recreational 25%, and subsistence 10% split of the TAC and that you recommend a better accounting system for the recreational and subsistence allocations. I believe that if you suggested punch cards and annual limits with a 1 fish any size daily bag limit for recreational fishermen and logbooks for subsistence fishermen; it would help those agencies focus their regulatory efforts and provide an effective method of accountability. Honestly, I believe you should also recommend a max size restriction in the recreational fishery so that we recognize and conserve the big old fat fecund female fish that are so important in providing recruitment for future years. We all need to do our part to maintain the halibut resource. And we

can do it with separate allocations for commercial, recreational, and subsistence sectors and management measures to keep each sector's harvest within their respective allocations. Thank you for your consideration. Let's Keep Halibut Forever!!!

**Suggested Regulatory
Language**

(field not answered)

APPENDIX IX

Regulation statement by Humboldt Area Saltwater Anglers



Humboldt Area Saltwater Anglers Inc.

P.O. Box 6191, Eureka, CA 95502

[Email: hasa6191@gmail.com](mailto:hasa6191@gmail.com)

FEIN #61-1575751

December 28, 2018

Mr. Paul Ryall, Chairperson
 International Pacific Halibut Commission
 2320 West Commodore Way
 Seattle, WA, 98199-1287

RE: IPHC-2018—AM094-Prop C1, Halibut Allocation to Area 2A

Dear Mr. Ryall:

The Humboldt Area Saltwater Anglers, Inc. (HASA) is a northern California sportfishing organization with over 300 members representing saltwater anglers since 2008. We have been actively engaged in saltwater sportfish management over the years, with the goal of providing a long-term sustainable Pacific halibut fishery for California anglers. With recent truncations and closures to our offshore salmon seasons, Pacific halibut has been an increasingly important sportfish for California anglers.

HASA has been consistently participating in the IPHC process over the years, and support the Makah Tribes request for 1.5 million pounds of Pacific halibut be allocated to the Area 2A region for the next 3-5 year period. This concept was proposed to the Pacific Fisheries Management Council (PFMC) and its advisory bodies in November of 2018, and had full support from both the Groundfish Advisory Subpanel and the Council itself.

Their letter of justification, as presented to the IPHC Secretariat, is well thought out and presents historical information that is informative and convincing. While California has only been active in the IPHC process since 2012, we appreciated the historical background and the perspective of the Tribes that have better than five decades of catch and mortality rates.

A brief review of IPHC survey history in California suggests our Pacific halibut densities for 032" halibut are similar to the other portions of Area 2A in Oregon and Washington. In addition, when the PFMC instituted the Individual Fishing Quota fishery in 2010 for the Pacific States, which mandated that observers be on board for all trawl vessels, it was observed that the by-catch was about two times the estimate prior to the trawl vessel observers. Since 2010, the bycatch in Area 2A has been reduced annually to approximately 100,000 lbs for the trawl sector, and about 140,000 pounds for all sector bycatch mortalities. This is a reduction of approximately 75% of the actual bycatch mortality prior to 2010.

Considering that the IPHC Survey Weight Per Unit Effort amounts of as presented in Table 1 of the Makah Tribe justification letter, showing 23.8 million pounds prior to 2008 and 22.7 million pounds after 2008, suggests our Area 2A Pacific halibut population densities have been relatively constant over time. While the Management Formulas and the Assessment Methods have been modified since 2008, impacting the Area 2A TCEY and FCEY allocation, the survey amounts have been relatively consistent.

At the interim meeting in December, the Secretariat stated that Area 2A, if granted 1.5 million pounds annually, would not be a conservation concern. We would support the Makah Tribe's position that the 1.5 million pound Area 2A allocation be taken off the top of the TCEY and not be deducted from any one Region or Regulatory Area. The Area 2A allocation is a very small portion (approximately 2%) of the overall Pacific halibut allocation. Therefore, we respectfully request that the Commission act in support of the Makah Tribe's letter for granting Area 2A 1.5 million pounds of Pacific halibut allocation for the next 3-5 year period.

Sincerely yours,



Scott McBain, President
Humboldt Area Saltwater Anglers, Inc.

APPENDIX X

Regulation statement by Harrison Ibach

From: Harrison Inch <harrison.ibach@yahoo.com>

Sent: Friday, December 28, 2018 5:55 PM

To: IPHC Secretariat <secretariat@iphc.int>

Subject: Regulation Statement

Dear IPHC,

I am writing in regards to the potential upcoming changes to the non-treaty directed commercial Pacific halibut fishery in IPHC Area 2A.

I am in full support of going away from the fishery's current 'derby-style' management structure. These 10 hour openers jeopardize the safety of fishermen as they feel compelled to fish in unfavorable and dangerous conditions.

I agree with a proposal of a 10-day or longer fishing period each year, with the possibility of additional fishing periods. This will ensure more opportunity to fish in safer conditions while reducing the race to fish.

While I am in full support of the longer fishing periods I am also concerned about repercussions from this action. I believe that this fishery will see an increase in effort resulting in lower boat limits and an increase in bycatch, most importantly yelloweye rockfish.

I believe that more fishermen will participate in this fishery as time goes on resulting in lower limits of fish. Not only will new participants enter the fishery as increased time gives one a better chance of catching fish, but it also creates incentive to engage in the fishery for a chance of potentially getting a permit if it were to become limited entry in the future. Another concern is that fishermen that already participate and have an understanding of the fishery could partner with other boats to gain additional limits of fish with the increased fishing period. We don't want to see so many new entrants that the boat limit will become so small that it is not worth fishing.

With more participation and fishing effort comes the possibility of an increased amount of bycatch, most concerning, yelloweye rockfish. There is a worry with an elevated amount of yelloweye bycatch that it could possibly effect not only this fishery, but many other fisheries that take place off the pacific coast.

Some fishermen believe that in order to avoid these potential repercussions it would be beneficial to consider turning this fishery into limited entry sooner than later. Fishermen have stated that those who have taken part in this fishery the past 2 or 3 years show that they are active and in part rely on this fishery.

It would be reasonable to use caution in allowing new entry into the fishery and possible to only reissue a permit to anyone that has landed a halibut during a 10 hour fishing period in the non-treaty directed commercial pacific halibut fishery in area 2A in the past 3 years.

Thank You-
Harrison Ibach
F/V Oceana

APPENDIX XI

Regulation statement by Marc Schmidt

From: Marc Schmidt <fvreelmagic@gmail.com>

Sent: Friday, December 28, 2018 9:15 PM

To: IPHC Secretariat <secretariat@iphc.int>

Subject: 2A Directed Commercial Halibut season comments - small boat owner operator input

IPHC,

First off, THANK YOU for bringing up the discussion to end these 10 hr derby openers; my wife, young kids, and I are hopeful it will turn into something more productive and safer for the established participants for decades to come. I am the owner and operator of a 26' vessel that has pulled the 2A directed permit every full year I have owned this vessel. I have been actively fishing in mostly terrible or marginal weather at best and have still been obtaining landings in recent years. These 10 hour derbies are unsafe and very stressful on many levels but also load the markets with these valuable fish all at once.

First off, I encourage establishing limited entry permits NOW based on vessels/owners that have had 2 or more landings in the last 3 years. This represents those of us that are committed and actively fishing this fishery. I know that there are fishermen looking at getting a permit this year if available and even did in 2018 just because there were rumors of possible limited entry permits that could be issued in this fishery. Additionally, new participants will create additional bycatch, gear conflicts, and they may not know if and how they will be contacting yelloweye RF without prior knowledge of the existing fishery, which those of us that participate already account for. If there is wide open enrollment for 2A directed permits combined with reduced quotas for vessel class size in 2019 due to lengthened fishing periods, I will likely end up with hundreds of hours invested in fishing, research, and gear prep in the last 7 years for a fishery not worth my time due to my vessel size limit.

If I understand the proposed 2019 commercial fishing periods correctly it looks like we are locked into what regulatory language has already been suggested as far as start dates for a 5 or 10 day openers starting on the last Saturday of June in 2019. I feel the third Monday in June (July and August as well) would be a better start date for reducing gear conflict with sportfishermen in CA (as pacific halibut season is closed the 16th - end of june, july, and aug, and not a weekend) and it allows professional longliners reasonable time fishing in multiple block periods. A june 29th, 2019 opener essentially creates a 2 day derby with multiple species bycatch issues with release mortality or creates a situation in which fishermen may strand their june groundfish quota hoping weather will be good the last two days of june to combine a halibut trip with other species. I would encourage the 10 day (or longer) option but see a need to keep it as simple math this year as we transition to a better assessed and informed season structure with more input from all stakeholders for a 2020 and beyond implementation. All boats with 2 or more landings in the last 3 years get a minimum of 2000 lbs divided by total 2A directed allocation for the first opener 2019 with the leftover allocation going to boats with higher landings in the last 3 years. For any subsequent openers in 2019 the quotas would likely be much reduced but issued in a similar fashion.

Thanks you for your consideration and I look forward to providing input from a small boat owners perspective as we work toward the best season structure for 2A directed commercial fishery participants in the years to come.

Marc Schmidt
F/V Reel Magic

APPENDIX XII

Regulation statement by Tom Marking

December 28, 2018

To: IPHC Commission
Paul Ryall, Chairperson

Subject: IPHC-2018—AM094-PropC1
Halibut Allocation to 2A

As a member of the PFMC groundfish advisory subpanel and member of the MSAB, I would like to go on the record supporting the Makah Tribes request for 1.5 M pounds of pacific halibut be allocated to the 2A region for the next 3-5 year period. This concept was proposed to the PFMC and the advisory bodies in November of 2018 and had support from both the Groundfish Subadvisory Committee and the Council. Two key elements to support this request are the consistency of the IPHC survey history in the 2A area, and the decrease in bycatch by the 2A area since 2010 that has diminished the mortality of halibut in the 2A area by probably 7 Million pounds or more. We think that the 2A area has not been compensated fairly commensurate to the reduction in mortality over that period.

The Makah Tribe letter of justification, as presented to the IPHC Secretariat, is well thought out and presents historical information that is informative and convincing. While California has only been active in the IPHC process since 2012, we appreciated the historical background and the perspective of the Tribes that have better than five decades of catch and mortality rates.

IPHC surveys in California, suggests our densities for 032" halibut are similar to the other areas of 2A in Oregon and Washington. Also, when the PFMC instituted the IFQ fishery in 2010 for the Pacific States, which mandated that observers be on board for all trawl vessels, it was observed the by-catch was about twice that which has been estimated. Since 2010, the bycatch in the 2A Region has been reduced annually to 100,000 lbs for trawl and about 140,000 pounds for all sector bycatch mortalities. This is a reduction of probably 75% of the actual bycatch mortality prior to 2010.

Considering that the Survey WPUE amounts as presented in Table 1 of the Makah Tribe justification letter, showing 23.8 M pounds prior to 2008 and 22.7 M pounds post 2008, suggests our population densities have been relatively constant over this period. While the Management formulas and the Assessment Methods have been modified since 2008, impacting the 2A TCEY and FCEY allocation, the survey amounts have been relatively consistent.

At the interim meeting in December, the Secretariat stated that the 2A region, if granted 1.5M pounds annually, would not be a conservation concern. We would support the Makah Tribe position that the 1.5 M pound allocation be taken off the top of the TCEY and not be deducted from any one Region or Regulatory Area. The percentage of mortality in the 2A region is a very small portion of the overall coastwide annual allocation.

It is a concern that while the WPUE in 2A has remained consistent over the past 17 years, our FCEY portion continues to be dramatically reduced by methodology and correction factors (such as the time-space model) of the Secretariat. Another background issue has been the longstanding mortality of small halibut in the Bering Sea of approximately 8+ millions pounds per year. That has been a detriment to all the Regions, especially areas south of the Gulf of Alaska where a large percentage of the lost fish would have migrated and grown to maturity. The 2 Region has been negatively impacted by the bycatch mortality for the past few decades that has only been addressed over the past few years. The recent survey concern over fewer smaller sized fish in the survey can be directly attributed to this bycatch mortality of the Bering Sea trawl fleet. We would hope the Commission would not penalize the 2A sub-region as a result of this source of mortality out of their control. Halibut are a very critical economic concern for the Pacific States. Reductions in FCEY have longstanding negative impacts on our ports and cities dependent upon fishery activity and landings.

We would respectfully ask that the Commission act in support of the Makah Tribe letter for granting the 2A area 1.5M pounds of halibut for the next 3-5 year period.

Respectfully,

Tom Marking
Recreational Sportsfishing

APPENDIX XIII**Regulation statement by Denny Corbin**

Requested By:	Denny Corbin
Requester E-mail	dennycorbin@pelicanlaskafishing.com
Date Requested	12/29/2018
IPHC Regulatory Areas that may be affected	2C and 3A
Fishery Sectors	• Recreational
Explanatory Memorandum	<p>I would like to recommend that halibut sport fishing regulations be changed to one fish of any size per person per day for areas 2C and 3A for both guided and unguided anglers with a possible annual limit also for unguided and guided anglers in both areas if the catch numbers are not satisfactory. I am recommending any size because; It is impossible to legally measure a halibut much larger than 32". Halibut never lay flat unless they are dead on the deck, or, as with a 12 pound halibut, they are forced in to a flat position. Any halibut larger than 12 pounds and you run the chance of losing control of the fish and as it is not legal to harm a halibut, lift it by the tail or do anything that might hurt it if you are planning to release it and because halibut always have a slight curve in the water which can easily account for several inches of length when attempting to measure and they will normally flop around violently when brought aboard, this make getting an accurate legal measurement of larger halibut an impossibility. I recommend one fish for both guided and unguided for all areas because the current regulatory scheme is insane and creates an un-level playing between the guided and un-guided industries and also between charter businesses in areas 2C and 3A. I know that one fish for everyone in all areas has been considered before but think a review of the previous analysis would be a good idea. I have been an Alaskan sport fishing guide for halibut for nearly 30 years and fished 10 seasons commercial long lining halibut prior to IFQ's and 5 years post IFQ's. My experience is what I am basing my recommendations on.</p>

APPENDIX XIV**Regulation statement by Tom Burlingame**

IPHC-2019-AM095-PropC1

Statement of Support

Submitted by Tom Burlingame

Excel Fishing Charters

Neah Bay, WA

January 14, 2019

I support Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A Halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

For the past 12 years I have owned and operated Excel Fishing Charters and The Inn at Neah Bay in Neah Bay WA. Also, for the past 6 years I have served as the recreational advisor to WDFW for area 4 (Neah Bay). These positions give me the opportunity to connect and hear the concerns of many private anglers and sport fishermen that are guests on our charter boat.

Even though WDFW and its managers have worked hard to fix this. In the past several years, because of low quotas and the uneasiness of a changing quota, sport fishermen of area 4 (Neah Bay) and the entire coast of Washington state have developed a derby mentality. Knowing that their Halibut fishing opportunity may only last 3 or 4 days, everyone feels that they must fish on the first few days of the season because that may be their only chance. This mentality has led to many bad consequences. Small coastal towns have been overrun with fishermen that cannot get moorage or a hotel room because of limited supply. They come to town, launch their boat, fish and leave. This makes for a poor recreational experience and lost revenue for the community. Also, fisherman feel they have to fish in poor weather and sea conditions. This is a safety concern. This proposal will help to ease concerns about quota levels on a year to year basis, allowing the recreational angler to better plan their fishing time with more confidence that the opportunity to fish will be available.

APPENDIX XV

Regulation statement by the Jamestown S'Klallam Tribe



JAMESTOWN S'KLALLAM TRIBE

1033 Old Blyn Highway, Sequim, WA 98382

360/683-1109

FAX 360/681-4643

Statement of Support

Regulatory Proposal IPHC-2019-AM095-PropC1

Submitted by the Jamestown S'Klallam Tribe

January 14, 2019

The Jamestown S'Klallam Tribe supports Regulatory Proposal IPHC-2019-AM095-PropC1, submitted by the Makah Tribe that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) for IPHC Regulatory Area 2A in 2019. The Makah Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery.

The Jamestown S'Klallam Tribe is a federally recognized Indian Tribe with fishing rights reserved as a signatory to the Treaty of Point No Point of 1855. Jamestown is one of 13 halibut fishing Tribes in Western Washington and co-managers of the halibut resource in Regulatory Area 2A along with the state of Washington, Oregon and California. Since the adoption of the IPHC Coastwide Model in 2008, low quotas for 2A have constrained the fishery and our fishermen. The 2A catch sharing plan is a delicate management balance between three states and 13 tribes that can be complicated in years with low quotas. Tribal fishery weight per unit effort has been increasing annually over the last several years despite reduction in treaty fishing opportunity due to historically low quotas. The Jamestown Tribe is committed to sustainable fishery management; both Tribal and non-tribal catch data in recent year's points towards a stable abundance of halibut in the region. The IPHC Secretariat has also confirmed that the request by the Makah Tribe does not raise a conservation concern to the halibut biomass.

For these reasons, along with the Explanatory Statement provided to IPHC, the Jamestown S'Klallam Tribe is in support of Makah's proposal for Regulatory Area 2A. Thank you for your consideration.

Sincerely,

W. Ron Allen, Chairman/CEO

APPENDIX XVI

Regulation statement by the City of Forks



500 E. Division St. • Forks, Washington 98331-8618

(360) 374-5412 • Fax: (360) 374-9430 • TTY: (360) 374-2696
forkswashington.org

IPHC-2019-AM095-PropC1

Statement of Support

15 January 2019

The City of Forks would like to voice its support for the Regulatory Proposal IPHC-2019-AM095-PropC1 as submitted by the Makah Tribe and supported by twelve other tribes including the Quileute and Quinault Nations. The Tribal proposal recommends a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. In the Makah Tribe's Explanatory Statement, they provided a detailed rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery. Equally important to the discussion and the consideration of this proposal is the fact that the IPHC Secretariat has confirmed that taking this approach would not raise a conservation concern.

Being the largest business center near the Ports of La Push and Neah Bay, the City of Forks benefits from the recreational halibut fishery with individuals overnighting, purchasing fuel and gear, and visiting our restaurant establishments. The City's engagement on these issues is not new. Forks has had a citizen participating and attending the PFMC meetings; calling together local recreational saltwater enthusiasts for advice and suggestions; and, the City has had its limited staff monitor and participate with WDFW staff on halibut catch issues.

One of the key aspects of the Makah Proposal is the development of a stable, predictable catch level for a three to five year period. This would allow local Chambers of Commerce, and local businesses, to develop marketing and business plans to meet the increased needs of recreational halibut fishers. This approach would also allow the Pacific Fishery Management Council the opportunity to stabilize the Pacific halibut fishery. This approach would allow for a more equitable tribal and non-tribal catch opportunity.

We are grateful for the Makah Tribe's work on this effort and look forward to the decision made by the IPHC in the months to come.

Sincerely,

Tim Fletcher
Mayor

APPENDIX XVIIRegulation statement by the Ilwaco Charter Association

IPHC-2019-AM095-PropC1

Statement of Support

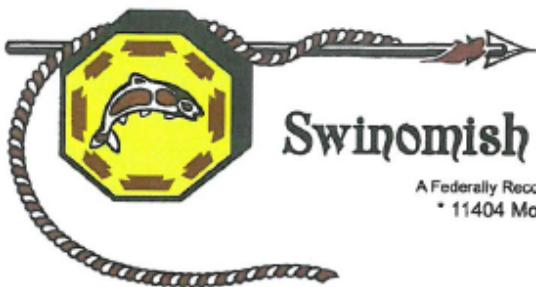
January 15, 2019

I support Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A Halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

The Ilwaco Charters Association is the largest charter boat Assoc. working in the Columbia River area. We have members from both the Washington and Oregon sides of the river. Halibut has been very important to the sport charter boats, as well as our commercial fleets, which help keep our coastal towns and Ports going. We strongly support proposal IPHC-2019-AM095-PropC1 it will add some very much needed stability to the fishery in 2a for all fishers both Tribal and non-Tribal while still meeting our conservation needs to the resource.

Thank you

Butch Smith Pres
Ilwaco Charter Assoc.
coho@willapabay.org

APPENDIX XVIIIRegulation statement by the Swinomish Indian Tribal Community

Main Office: 360.466.3163
Facsimile: 360.466.5309

Swinomish Indian Tribal Community

A Federally Recognized Indian Tribe Organized Pursuant to 25 U.S.C. § 478
• 11404 Moorage Way * La Conner, Washington 98257 *

Statement of Support

Regulatory Proposal IPHC-2019-AM095-PropC1

Submitted by the Swinomish Indian Tribal Community
January 15, 2019

The Swinomish Indian Tribal Community supports Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

The Swinomish Indian Tribal Community is a federally recognized Indian Tribe, and as a signatory of the Treaty of Point Elliot of 1855, has treaty reserved fishing rights. The Swinomish Indian Tribal Community is a fishing community, within which commercial, ceremonial, and subsistence harvest of finfish species including halibut is integral to our way of life. Fishing sustains the economic, cultural, and spiritual wholeness of our people and traditions.

As one of the 13 halibut fishing tribes in Western Washington, Swinomish is a co-manager of the halibut resource in Regulatory Area 2A. Low halibut quotas in Area 2A since 2008 have strained the regional tribal catch sharing plan to the point of making it almost unworkable and significantly affected the ability of our fishers to exercise their treaty rights. We strongly support the Makah proposal that would provide stability of the Area 2A quota at a level that allows us to maintain the effectiveness of the catch sharing plan and exercise our treaty rights while not having a deleterious effect on the coastwide biomass or raising conservation concerns.

Sincerely,

Brian Cladoosby, Chairman

APPENDIX XIX

Regulation statement by the Port Gamble S'Klallam Tribe



PORT GAMBLE S'KLALLAM TRIBE
31912 Little Boston Rd. NE – Kingston, WA 98346

Statement of Support for regulatory proposal IPHC-2019-AM095-PropC1

January 14, 2019

Dear Mr. Steve Keith,

The Port Gamble is one of 13 halibut fishing Tribes in Western Washington and a co-manager of the resource in regulatory area 2A. This letter is to express our support for the Regulatory Proposal IPHC-2019-AM095-PropC1. This proposal submitted by the Makah Tribe requests a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Makah Tribe's Explanatory Statement describes in detail, the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery.

The Port Gamble S'Klallam Tribe is a federally recognized Indian Tribe that has the treaty right, including the right of access to places, the right to a share of harvest to meet tribal moderate living needs, and the right to protection of fish habitat in all areas of the Tribe's Usual and Accustomed areas (U&A). In 1855 the ancestors of today's Port Gamble S'Klallam Tribe signed the Treaty of Point No Point with the United States government, in which they ceded three quarters of a million acres of land and reserved off-reservation hunting and fishing rights. More than 190 tribal members earn all or a portion of their livelihood working as commercial salmon, halibut and shellfish harvesters. In addition, the Tribe conducts fisheries in its U&A for ceremonial and subsistence harvests which are a key element of the diet and way of life for tribal members. These fisheries allow indigenous knowledge to be passed down as it has for millennia.

Since the adoption of the IPHC coastwide model in 2008, low quotas for 2A have constrained our halibut fishery. The 2A catch sharing plan that consists of three states and 13 tribes can be difficult to execute in years with low quotas, resulting in severely constrained fisheries that restrict equal opportunity between the Tribes. The tribal fishery weight per unit effort has been increasing over the past few years despite reductions in the quotas. Both Tribal and non-tribal catch in recent years points towards a stable abundance of halibut within the region. In addition, the IPHC Secretariat has also confirmed that this proposal does not raise a conservation concern to the halibut biomass.

For the reasons listed above, along with the Explanatory Statement provided to IPHC, the Port Gamble S'Klallam Tribe is in support of Makah's proposal for Regulatory Area 2A. Thank you for your consideration.

Respectfully,

Jeremy Sullivan, Chairman
Port Gamble S'Klallam Tribe

APPENDIX XX

Regulation statement by the Suquamish Tribe



FISHERIES DEPARTMENT
360/394-8437
Fax 360/598-4666

THE SUQUAMISH TRIBE

P.O. Box 498 Suquamish, Washington 98392

Statement of Support
Regulatory Proposal IPHC-2019-AM095-PropC1
Submitted by the Suquamish Tribe
January 15, 2019

The Suquamish Tribe supports Regulatory Proposal IPHC-2019-AM095-PropC1, submitted by the Makah Tribe which supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) for IPHC Regulatory Area 2A in 2019. The Makah Tribe's Exploratory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery.

The Suquamish Tribe is a federally recognized Indian Tribe with fishing rights reserved as a signatory to the Treaty of Point Elliott of 1855. Suquamish is one of 13 halibut fishing Tribes in Western Washington and co-managers of the halibut resource in Regulatory Area 2A along with the state of Washington, Oregon and California. Since the adoption of the IPHC Coastwide Model in 2008, low quotas for 2A have constrained the fishery and our fishermen. The 2A catch sharing plan is a delicate management balance between three states and 13 tribes that can be complicated in years with low quotas. Tribal fishery weight per unit effort has been increasing annually over the last several years despite reduction in treaty fishing opportunity due to historically low quotas. The Suquamish Tribe is committed to sustainable fishery management; both Tribal and non-tribal catch data in recent years points towards a stable abundance of halibut in the region. The IPHC Secretariat has also confirmed that the request by the Makah Tribe does not raise a conservation concern to the halibut biomass.

For these reasons, along with the Explanatory Statement provided to IPHC, the Suquamish Tribe is in support of Makah's proposal for Regulatory Area 2A. Thank you for your consideration.

Sincerely,

Robert Purser, Jr
Fisheries Director
Suquamish Tribe

APPENDIX XXI

Regulation statement by the Lower Elwha Klallam Tribe



Lower Elwha Klallam Tribe

?ə?íxʷə nəxʷsƛ'ay əm "The Strong People"

2851 Lower Elwha Road
Port Angeles, WA 98363

360.452.8471
360.452.3428

Via email to steve@iphc.int

IPHC-2019-AM095-Prop C1

**Statement of Support
For Makah Explanatory Statement of December 20, 2018**

**Submitted by Lower Elwha Klallam Tribe
January 14, 2019**

The Lower Elwha Klallam Tribe supports Regulatory Proposal IPHC-2019-AM095-Prop C1, which was submitted by the Makah Tribe. The Makah Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Makah Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

The Lower Elwha Klallam Tribe is the fourth largest harvester of commercial halibut in the Area 2A fishery, and harvests an additional 1,000 lbs. of halibut for our people's ceremonial and subsistence needs. This longstanding practice is an indigenous right enshrined as Federal law by the 1855 Treaty of Point No Point, ensuring to our Tribe the right to an equitable share of the available fish in our ceded territory. As co-Managers with the State of Washington, which oversees the recreational halibut fishery, the Lower Elwha Tribe participates in the development of the Catch Sharing Plan for halibut in Area 2A through the Pacific Fisheries Management Council (PFMC).

Under this distribution methodology, continued reductions in allowable removals from Area 2A under annual coast-wide assessments going back to 2008 have created severe hardship within Area 2A. As allowable removals have declined and fishery WPUE has increased, it has become increasingly difficult to sustainably manage Area 2A fisheries under the Catch Sharing Plan adopted by the Pacific Fishery Management Council (PFMC), resulting in the impairment of our tribal treaty rights.

The Makah Tribe's regulatory proposal is a reasonable measure to stabilize the Area 2A TCEY for a three-to-five-year period while the IPHC, the Secretariat and related bodies, including the Management Strategy Advisory Board, continue to evaluate questions about the current coast-

wide stock assessment, distribution methodology and appropriate levels of coast-wide fishing intensity.

The IPHC Secretariat and IPHC staff have noted that an FCEY of 1.5MLb for Area 2A does not currently represent a conservation concern for the coast-wide stock or for Region 2 even if no reductions were made in other areas to compensate. Accordingly, there is no conservation need to reduce the TCEY in any other area if Makah's proposal is adopted.

For these reasons, the Lower Elwha Klallam Tribe respectfully requests that IPHC adopt Regulatory Proposal IPHC-2019-AM095-Prop C1 and adhere to it over a three-to-five-year period. The proposal would help stabilize Area 2A fisheries that have been seriously and adversely affected by the current coast-wide assessment and apportionment methodology, without adversely affecting any other area or the halibut resource. Please add this Statement of Support to Makah's proposal (IPHC-2019-AM095-Prop C1).

Thank you for your consideration.

Sincerely,

Frances G. Charles
Frances G. Charles, Chairwoman
Lower Elwha Klallam Tribe

APPENDIX XXII

Regulation statement by Robert Greenfield

From: Rob Greenfield <rtg327@hotmail.com>

Sent: Thursday, January 17, 2019 3:42 PM

To: IPHC Secretariat <secretariat@iphc.int>

Subject: Area 2A directed commercial fishery

To whom it may concern,

My name is Robert Greenfield, and I own and operate the F/V Remembrance. I would like to comment about the proposed changes to the area 2A directed commercial fishery. I have participated in the 2A fishery for several years and have become dependent on this fishery for my family's summer income. Extending the fishing periods to five days will not change the dynamics of the fishery other than it will lower our catch limits. It will still be a race amongst the boats to get to the productive locations first to assure them that they will catch their fish. The same derby style opener will still occur at 8:00 a.m. on the opening day. One other concern I have is changing the dates of the openers. Several fisherman from my home port leave for Alaska in the middle of June. If you move the fishing periods to May or early June, there will be a substantial increase in participation. Also the sport fishery takes place in May which could cause a conflict , therefor I suggest that you leave the fishing period dates the same, starting the last Wednesday in June.

My vessel longlines for sablefish in the summer. Retaining the incidental halibut we catch rather than discarding them makes a lot more sense both economically and biologically. We release discard several halibut each year during our sablefish fishery. If you could make it an option for Limited Entry vessels to retain their share of halibut while fishing sablefish, it would eliminate them from the fleet of boats participating in the fishing periods. Please take my comments into consideration before making a decision on these issues .

Best regards, Robert Greenfield

f/v Remembrance

APPENDIX XXIII

Regulation statement by the Lummi Nation

LUMMI INDIAN BUSINESS COUNCIL
2665 KWINA ROAD BELLINGHAM, WASHINGTON 98226 (360) 312-2000

DEPARTMENT _____

DIRECT NO. _____

IPHC-2019-AM095-PropC1

Statement of Support

Submitted by the Lummi Nation

January 16, 2019

The Lummi Nation is one of 13 halibut fishing tribes in Western Washington and a co-manager of the resource in regulatory area 2A. This letter is to express our support for the Regulatory Proposal IPHC-2019-AM095-PropC1. This proposal submitted by the Makah Tribe requests a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Makah Tribe's Explanatory Statement describes in detail, the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery.

In 1855 the ancestors of today's Lummi Nation signed the Point Elliott Treaty. Today, the Lummi Nation is a federally recognized Indian tribe with treaty reserved rights to harvest fish and shellfish in their Usual and Accustomed fishing grounds and stations. Approximately 80 Lummi registered boats with an average of 2-4 crew participate in the tribe's halibut fisheries, providing an important source of income at a time of the year when there few fishing opportunities.

Since the adoption of the IPHC coastwide model in 2008, low quotas for Regulatory Area 2A have constrained our halibut fishery. The 2A catch sharing plan that consists of three states and 13 tribes can be difficult to execute in years with low quotas, resulting in severely constrained fisheries that restrict equal opportunity between the Tribes. The tribal fishery weight per unit effort has been increasing over the past few years despite reductions in the quotas. Both Tribal and non-tribal catch in recent years points towards a stable abundance of halibut within 2A. In addition, the IPHC Secretariat has also confirmed that Makah's proposal does not raise a conservation concern to the halibut biomass.

For the reasons listed above, along with the Explanatory Statement provided to IPHC, the Lummi Nation supports Makah's proposal for Regulatory Area 2A. Thank you for your consideration.

Respectfully,

Merle Jefferson, Sr.

Director, Lummi Natural Resource Department

APPENDIX XXIV

Regulation statement by the Puget Sound Anglers State Board



IPHC-2019-AM095-PropC1

Statement of Support

Submitted by Ron Garner
Puget Sound Anglers
State Board
Washington State
January 17, 2019

We support Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A Halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

The Puget Sound Anglers State Board President consists of 16 Chapters, the largest sportfishing organization in Washington State representing thousands of anglers, endorses the increase. I personally have been working at the 2A level with WDFW halibut since 1990 and have watched our 2A quota continually shrink. Our coastal and tribal communities have suffered greatly with the seasons only lasting days. They need all of the help they can get. With our 2A quota being roughly 1.8% of the total coastal biomass, we have never felt there was a halibut shortage in our area. The fishing is usually fast and easy to catch which seems to be that there are many fish left after our recreational fishery closes.

Due to the low amount of quota, this fishery only lasts days. The average halibut angler plans their vacation every year on our coast for this. They count on it and when the weather is too rough to go, people choose to go anyway due to knowing that the season is going to close in a couple more days. They already spent thousands of dollars and vacation days from work to make the trip, so they are probably going to risk the stormy waters. Having a larger biomass should help reduce some of this pressure and allow a little more flexibility with the amount of days.

Sincerely,
Ron Garner
President
Puget Sound Anglers
State Board

APPENDIX XXVRegulation statement by the Westport Charterboat Association

IPHC – 2019 – AM095 – PropC1
Statement of Support

The Westport Charterboat Association supports Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A Halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

The Area 2A halibut fishery is very important to the small fishing town of Westport, Washington. Although the short season of 4 days or less may not seem like much, these 4 days are an important boost to our local economy after a winter of no fishing opportunity. For the short halibut season, our community fills up with anglers from all over Washington state as the halibut fishery is highly productive, typically resulting in limits of halibut for all our vessels in less than an hour or two of fishing time.

The 2014 through 2018 halibut seasons were 3 or 4 days in length in Westport. The 2011 through 2013 halibut seasons were 5 days in length. Looking back prior to 2008 is when Westport had a healthy amount of halibut fishing days. The decline in halibut opportunity has greatly impacted our small fishing community. Halibut fishing once brought a large boost to our spring time economy, while now there are only a few days available to try to generate the same amount of income. The members of the Westport Charterboat Association are highly dependent on every fishing opportunity that is available. The decline in the opportunity to fish for halibut is hurting our community. Westport needs a stable fishery that has a high enough FCEY, as proposed, to support all the stakeholders in area 2A.

Thank you,
Jonathan Sawin – Westport Charterboat Association President

APPENDIX XXVI**Regulation statement by the Coastal Trollers Association**

CTA_IPHC_2019

Statement of Support

Submitted by Coastal Trollers Association

January 17, 2019

Coastal Trollers Association(CTA) supports Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

Coastal Trollers Association is comprised of members that troll for salmon on the west coast of Washington, Oregon, and California. In addition to the TAC of Chinook salmon, the trollers in area 2A also have an incidental by-catch provision for halibut, lingcod, and yellowtail rockfish. The inclusion of the incidental by-catch (especially halibut) in the troll fishery is an important component of our fishing. Having a stable quota in area 2A would be advantageous to our livelihood.

APPENDIX XXVII**Regulation statement by Joel Kawahara**

International Pacific Halibut Commission
2320 West Commodore Way
Ste 300
Seattle, WA 98199

Dear Chair Ryall and members of the Commission,

I support Regulatory Proposal IPHC-2019-AM095-PropC1, submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A Halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

I participate in the 2A non-treaty commercial harvest by way of the salmon troll incidental allowance. For trollers, halibut represent a significant source of income. Halibut can be up to 30% of the revenue of any trip as an individual halibut is worth about the same as a salmon and the halibut trip limit is about 1/3 of the number of salmon trip limit. When we are at 50 salmon trip limits, as we often are in the spring, the halibut represent real money.

Just as important as the year to year income is stability of one's business. While we all realize we can not be allowed to over-harvest the resource in the name of stability, it is apparent that the Makah have successfully demonstrated that their proposal does not raise conservation concerns with the IPHC staff. For my operation, knowing that there will be a continuation of the incidental halibut allowance allows me to estimate income and make business plans.

I will point out that the halibut bycatch rates in 2A are very low compared to Gulf of Alaska and Bering Sea rates. While this is due to structural changes in the trawl fleet, including the trawl quota system, the Rockfish Conservation Areas and Essential Fish Habitat Conservation Areas enacted by the Pacific Fisheries Management Council, never the less, there have been significant savings in halibut pounds discarded. While it is IPHC policy to simply aggregate the savings into the coast wide biomass, it does seem that the Commission should look favorably at the bycatch savings and take those efforts into some account when considering this proposal.

Joel Kawahara
F/V Karolee

APPENDIX XXVIII

Regulation statement by the Quinault Indian Nation



Quinault Indian Nation

POST OFFICE BOX 189 • TAHOLAH, WASHINGTON 98587 • TELEPHONE (360) 276-8211

Via email to steve@iphc.int

Statement of Support

**For Regulatory Proposal IPHC-2019-AM095-PropC1 and Makah
Explanatory Statement dated December 20, 2018**

**Submitted by the Quinault Indian Nation
January 18, 2019**

The Quinault Indian Nation supports the Regulatory Proposal IPHC-2019-AM095-PropC1 submitted by the Makah Tribe. That proposal, requesting a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds for IPHC Regulatory Area 2A in 2019 is critical for all participants in the Area 2A halibut fishery. The Explanatory Statement also submitted by the Makah Tribe fully explains the rationale for the proposal. The Quinault Indian Nation is committed to sustainable management of its resources and we note that the IPHC Secretariat has stated that the Area 2A FCEY requested in PropC1 does not raise conservation concerns for the coast-wide halibut stock or for Area 2 as a whole.

The Quinault Indian Nation has reserved fishing rights guaranteed by the Treaty of Olympia signed with the United States Government in 1856. One of the fisheries reserved by that Treaty is halibut, harvested by Quinault and co-managed through a complex Catch Sharing Plan through the Pacific Fisheries Management Council (PFMC) and agreements with twelve fellow treaty tribes. This complex management structure requires a minimum amount of fish to meet the needs of each of the Tribes and the sport and commercial needs of the three states. The recent Area 2A FCEYs have resulted in extremely short, limited fishing opportunity for all parties involved, both state and tribal, and yet during that time the tribes have documented increasing WPUE in commercial catch during those short openings.

Area 2A is distinctly different from other IPHC regulatory areas both biologically and socially. Since it comprises the southern end of the Pacific halibut distribution in the NE Pacific Ocean and the population of fish within this area is a small fraction of the total

population, reasonable harvest levels as requested in PropC1 will meet the social needs of Area 2A without jeopardizing the halibut stock as a whole.

This one-year proposal will allow the complex, multi-governmental catch sharing plan in Area 2A to meet the needs of all involved. It is our contention that the same or a similar amount will be needed in future years as well, as long as that amount does not create a conservation concern based on scientific data.

We ask that you add this Statement of Support to the Makah proposal, IPHC-2019-AM095-PropC1, and thank you for your consideration.

Sincerely,



Fawn Sharp, President
Quinault Indian Nation

APPENDIX XXIX

Regulation statement by the Olympic Peninsula Guides' Association



Olympic Peninsula Guides' Association

IPHIC-2019-AM095-PropC1
Statement of Support

January 25, 2019

To Whom It May Concern:

The Olympic Peninsula Guides' Association (OPGA) supports Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

OPGA is an association composed of river guides as well as charter and recreational halibut fisherman. With a couple of our members being part of the 2A distribution process for area 3 La Push. The halibut fishery is a very big part of our livelihood as well as for the local businesses. Our area has been hit hard the last few years with the instability of fishing opportunity.

The Makah's with other Washington tribes as co-managers with Washington Department of Fish & Wildlife have submitted a plan to help stabilize the halibut fishery. The OPGA has been working hand and hand with (WDFW) to stabilize other fisheries in WA. The Makah's proposal is an attempt to stabilize halibut fishing for all of 2A for the next 3-5 years. In the past the instability has been detrimental to the economy of 2A.

The OPGA does support the proposal the tribes have put forth and asks the IPHC to support it as well.

Sincerely,

Bill Meyer

Bill Meyer
President of Olympic Peninsula Guides Association
206-697-2055

Olympic Peninsula Guides' Association
info@OlympicPeninsulaGuidesAssociation.com
 PO Box 2283, Forks, WA 98331
www.OlympicPeninsulaGuidesAssociation.com

APPENDIX XXX

Regulation statement by the Washington Department of Fish and Wildlife



State of Washington

DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: P.O. Box 43200, Olympia, WA 98504-3200 • (360) 902-2200 • TDD (360) 902-2207
 Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

January 25, 2019

Dear International Pacific Halibut Commission:

RE: IPHC-2019-AM095-PropC1

The Washington Department of Fish and Wildlife (WDFW) has reviewed and discussed the proposal submitted to the International Pacific Halibut Commission (IPHC) by the Makah Tribe (IPHC-2019-AM095-PropC1) with the Makah Tribe and representatives of other Treaty Tribes that fish for Pacific halibut. Through those discussions, it is our understanding that the proposal is for the IPHC to adopt a TCEY for Area 2A that results in an FCEY of 1.5 million lbs. for 2019 and to accomplish this by increasing the total coastwide TCEY, rather than shifting halibut from other IPHC regulatory areas. Based on this understanding, WDFW supports this proposal for Area 2A.

The rationale for this proposal includes:

1. Based on the best scientific information available, providing these additional fish to Area 2A does not pose a conservation risk relative to the status of the coastwide Pacific halibut stock. This is in part because the difference between the TCEY and FCEY for Area 2A in recent years is extremely low (i.e., less than ten percent of the TCEY); therefore, the TCEY needed to achieve an FCEY of 1.5 million lbs. is approximately 1.65 million lbs.
2. The TCEY requested is within the range of the annual mortality for Area 2A for the past 20 years, which is 1.16 to 2.02 million lbs., and near the average annual mortality for this same period, which is 1.6 million lbs.

Some have questioned why Area 2A should be treated differently than other IPHC regulatory areas and, in our opinion, we believe that similar proposals for other regulatory areas merit consideration. Specifically, other regulatory areas with a less than 10 percent difference between their TCEY and FCEY requesting a TCEY that is around the average annual mortality for that area for the past 20 years that would not pose a conservation risk relative to the status of the coastwide Pacific halibut stock, in our opinion, warrants consideration.

We appreciate the opportunity to provide these comments to the IPHC. If you have any questions, please feel free contact me at (360) 902-2182 or Michele.Culver@dfw.wa.gov.

Sincerely,

Michele K. Culver

Michele K. Culver
 Intergovernmental Ocean Policy Manager

APPENDIX XXXIRegulation statement by the Oregon Coast Charter Association

January 18, 2019

IPHC-2019-AM095-PropC1 Statement of Support

We support Regulatory Proposal IPHC-2019-AM095-PropC1, which was submitted by the Makah Tribe. The Tribe proposes a Total Constant Exploitation Yield (TCEY) for IPHC Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of no less than 1.5 million pounds (Mlb) in 2019. The Tribe's Explanatory Statement provides a detailed explanation of the rationale for the proposal, which is critical for all participants in the Area 2A Halibut fishery and, as the IPHC Secretariat has confirmed, does not raise a conservation concern.

The Oregon Coast Charter Association represents charter boat owners, offices, captains and crew along the entire Oregon coast. Halibut is very important to the sport charter boats, as well as to our commercial fleets, which help keep our coastal towns and ports going. We strongly support proposal IPHC-2019-AM095-PropC1. It will add some very much needed stability to the fishery in 2a for all fishers both Tribal and non-Tribal while still meeting our conservation needs to the resource.

Thank you,

Tamara Mautner
Secretary
Oregon Coast Charter Association

APPENDIX XXXII

Regulation statement by the Oregon Department of Fish and Wildlife

Oregon
Kate Brown, Governor

Department of Fish and Wildlife

Marine Resources Program
2040 SE Marine Science Drive
Newport, OR 97365
(541) 867-4741
Fax: (541) 867-0311
www.dfw.state.or.us



January 25, 2019

International Pacific Halibut Commission
2320 West Commodore Way
Salmon Bay, Suite 300
Seattle, WA, 98199-1287
U.S.A.

RE: 2019 Catch Limits and Regulatory Proposal IPHC-2019-AM095-PropC1

Dear International Pacific Halibut Commissioners:

The Oregon Department of Fish and Wildlife (ODFW) offers the following information on the importance of halibut fisheries in Oregon for consideration as 2019 catch limits are evaluated and determined.

In addition, we wish to express preliminary support for [Regulatory Proposal IPHC-2019-AM095-PropC1](#) (PropC1), which would establish a minimum Total Constant Exploitation Yield (TCEY) for Regulatory Area 2A that supports a Fishery Constant Exploitation Yield (FCEY) of 1.5 million pounds. PropC1 also recommends that this approach be used for the next 3-5 years.

ODFW manages recreational fisheries for Pacific halibut and other species in Oregon, and participates in development of the Area 2A Pacific Halibut Catch Sharing Plan (CSP) through its seat on the Pacific Fishery Management Council and direct engagement with stakeholders. Halibut fisheries bring significant recreational and commercial opportunity and economic benefits to Oregon's communities and businesses associated with fishing, tourism, fish processing, and related activities.

Catch limits directly affect total economic benefits via their relationship with recreational fishing effort (days open, number of angler trips) and commercial landings. Table 1 shows estimated impacts to jobs and income within Oregon from several possible Area 2A FCEY levels. The values shown encompass a range from 0.64 million pounds, which results from the default settings¹ in the [IPHC's mortality projection tool](#), to 1.5 million pounds, as requested in [PropC1](#). We recognize that the IPHC may adopt a number different than those listed here, within or outside of this range.

¹ Reference SPR (46%), coastwide TCEY of 40 million pounds, and current distribution between regulatory areas

Table 1. Projected Economic Impacts in Oregon for a Range of Area 2A FCEY levels

2019 Area 2A Catch Limit		Non-Tribal Commercial Fisheries, Projected Impacts ²		Recreational Fishery Projected Impacts ³		Total Projected Impacts	
Scenario	2A FCEY (lbs)	Income	Jobs	Income	Jobs	Income	Jobs
2018 actual	1,190,000	\$1,808,837	40	\$2,313,624	46	\$4,122,461	86
2019 default	640,000	\$972,818	21	\$1,244,302	25	\$2,217,120	46
2019 PropC1	1,500,000	\$2,280,043	50	\$2,916,333	58	\$5,196,376	108

This information illustrates the general magnitude of the economic value of halibut fisheries in Oregon, and the relative differences across a range of 2019 catch limits. In summary, 2018 halibut fisheries provided approximately \$4.1 million dollars in income and supported 86 jobs in Oregon. In 2019, the default limit would reduce these amounts by 46% compared to 2018, and the PropC1 “floor” would result increase them by 26%.

Oregon’s halibut fisheries have value beyond the projected jobs and income. The majority of recreational halibut activity occurs in the spring, when overall tourism is relatively low and there are fewer other fisheries (such as salmon or tuna) to draw anglers to the coast. Halibut-related expenditures are a welcome boost for coastal communities at that time of year. In addition, Oregon’s nearshore groundfish fishery is currently severely constrained by quotas for several rockfish stocks. Halibut opportunity may draw some effort away from nearshore rockfish, reducing the risk of emergency closure of Oregon’s recreational groundfish fishery due to early quota attainment.

Similarly, halibut is an important component of commercial fishing portfolios, as one of multiple fisheries necessary to support many fishing and processing operations. In 2018 in Oregon, 51 vessels made landings in the non-tribal directed commercial fishery, and 27 vessels landed halibut incidental to salmon trolling. With severe declines in salmon fisheries in recent years (\$15 million drop in revenue from 2014 to 2017), halibut has taken on greater importance, particularly to those vessels participating in the directed fishery.

In both commercial and recreational fisheries, drawbacks of lower catch limits include reduced economic and social benefits of halibut opportunity and catch, as well as the potential to condense fishing effort into shorter seasons, possibly contributing to crowding and safety concerns. We note that if the 2A FCEY is less than 700,000 pounds, Oregon’s summer all-depth season will not occur at all, per the 2A CSP.

² Based on: 84.2% of 2A directed landings occur in OR at \$6.18/lb avg.; 9.21% of 2A incidental with salmon troll landings occur in OR at \$6.80/lb avg; expanded via multipliers from the [IO-PAC model](#) used by the National Marine Fisheries Service to evaluate economic impacts for West Coast fisheries

³ Based on: Oregon halibut angler trips = Area 2A FCEY * 0.016² as established by [The Research Group \(2016\)](#); expanded with IO-PAC multipliers

As with all fishery resources, ODFW's first priority for Pacific halibut management is the conservation of the stock at coastwide and local scales to ensure sustainable long-term harvest opportunity and meet ecosystem needs. We appreciate the information provided in the IPHC's 2019 harvest decision table on pages 21-22 of the [2018 stock assessment](#), which facilitates evaluation of various coastwide catch limits and associated risk in terms of stock status and trend.

In reviewing PropC1, we note that it asserts that the proposed minimum 2A TCEY, to be achieved via addition to the coastwide TCEY, would not be a conservation concern or require reductions in other areas. Recognizing that "conservation concern" is a somewhat subjective judgment, we look forward to the potential for additional information from the IPHC Secretariat at the annual meeting relative to these conclusions, as well as robust discussion. We concur with the proposal's observation that the particular halibut stock and fishery management dynamics in Area 2A warrant consideration in this context.

Provided that information and input from the IPHC, co-managers, and stakeholders continue to indicate that PropC1 would not create a concern in terms of stock status and trend or negatively impact other regulatory areas' catch limits, ODFW supports adoption of PropC1, noting the benefits to Oregon's fisheries and fishing communities that the proposed catch limits and multi-year stability could provide.

Thank you for your consideration of these comments. I invite the IPHC Commissioners, Secretariat, or others to contact me in person at the annual meeting or at (541) 961-7990 or maggie.sommer@state.or.us with any questions.

Sincerely,



Maggie Sommer
Marine Fisheries Manager

APPENDIX XXXIIIRegulation statement by the Recreational Fishing Alliance, Oregon Chapter

Commissioners IPHC

RE: Support of Makah Tribal Proposal #IPHC-2019-AM095-PropC1 Rev_1

The Recreational Fishing Alliance, Oregon Chapter (RFA-OR) is a state chapter of saltwater anglers supporting the recreational fishing industry nationwide.

RFA-OR is in full support of the Makah proposal entitled: Minimum TCEY in IPHC Regulatory Area 2A for the following reasons::

1. The Makah Proposal clearly lays out the evidence and rationale for the suggested policy changes.
2. Area 2A abundance estimates are related to four separate fishery dependent and observed information data sets in this proposal.
3. The proposed harvest level does not pose a conservation concern according to IPHC staff.
4. This minimum TCEY does not require shifting any quota from any other area(s).
5. It is not a permanent policy proposal. It does provide stability for Area 2A while an evaluation is done regarding Coastwide Assessment, Distribution Methodology and Appropriate Fishing Intensity Levels is completed.

Thank you for your consideration of this input.

John Holloway

CoChair RFA-OR

APPENDIX XXXIV

Regulation statement by the Quileute Tribal Council

QUILEUTE TRIBAL COUNCIL

POST OFFICE BOX 279
LA PUSH, WASHINGTON 98350-0279
TELEPHONE (360) 374-6163
FAX (360) 374-6311



January 23, 2019

David T. Wilson
Executive Director
International Pacific Halibut Commission
2320 West Commodore Way Suite 300
Seattle, WA 98199

Dear Dr. Wilson;

With the Annual IPHC meeting fast approaching we want to relay a couple of important messages from the Washington coast our "ancestral corridor". First, we appreciate the participation of you and your staff in the dialogue over the past couple of years as the 13 Treaty Halibut Tribes work to resolve an appropriate path for determining the allocation of halibut to the treaty fishery. Second, we appreciate in advance the patience of IPHC as the Treaty Halibut Tribes implement both short term and long-term strategies to a more permanent process.

At this juncture the 13 Treaty Halibut Tribes are in pursuit of two related yet separate processes for the determination of available halibut to our fishery. We want to be clear, the pathway which was initiated this fall with National Marine Fisheries Service (NMFS) is a dialogue with our "trustee". With the signing by our ancestors of the treaty with the U.S. Government in 1856 (Treaty of Olympia: <https://nwifc.org/w/wp-content/uploads/2018/02/treaty-of-olympia.pdf>), a unique relationship with the U. S. Government was created and thereby designated agents of that government as our "trustee". This relationship creates a responsibility to ensure that actions by that government do not have a negative impact to our treaty reserved way of life. Unfortunately, during the time when the Halibut Convention was created, the process it created did not account for our treaty. This error which has been highlighted in recent years with changing stock assessment methodologies and subsequent allocations is what we are currently seeking to rectify in our dialogue with NMFS and the Department of State.

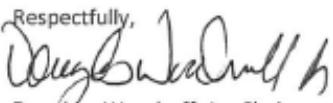
The second process in which we are engaged is in response to the annual cycles of the IPHC Secretariat. As you are aware, the 2018 Annual meeting resulted in a lack of agreement between the IPHC Commissioners and despite the 13 Treaty Halibut Tribes objection, resulted in a reduced allocation to both our treaty fishery and all halibut fisheries within Regulatory Area 2A. In response, the 13 Treaty Halibut Tribes have held numerous discussions over the last year to evaluate different approaches to the IPHC process that may in the short term better align to the needs of the Treaty Halibut Fishery. As the result of these discussions, Makah Tribe provided testimony at the IPHC 2018 Interim Meeting regarding a regulatory proposal. Subsequently the Makah Tribe with the support of all 13 Treaty Halibut Tribes officially submitted that proposal

along with an explanatory statement (<https://www.iphc.int/uploads/pdf/am/2019am/iphc-2019-am095-propcl.pdf>) as per IPHC prescribed processes.

By this letter Quileute Tribal Council is reiterating our support of the concept contained in this proposal for an Area 2A TCEY that provides for an FCEY of 1.5 million pounds. Additionally, until such time the Treaty Halibut Tribes can agree upon an appropriate process for allocation to our fishery with NMFS, we believe it is imperative that the Treaty Halibut Fishery allocation floor be adopted at this level for a period of 3-5 years. Also, key to this approach is that not one regulatory area is burdened but that any additional allocation is created through adding 880,000 pounds to the coastwide mortality reference level of 40 Million pounds as presented at the 2018 IPHC Interim meeting.

It is our belief that through implementation of this regulatory proposal the Treaty Halibut Tribes fishery can remain viable as we develop an appropriate process of allocation with our trustees. While Quileute Tribe representatives plan on attending the IPHC Annual meeting in Victoria, B.C., our role will be to provide information to the annual process and not to engage in the Conference Board negotiation process.

Please contact our Director of Natural Resources, Frank Geyer at 360-374-2027 or frank.geyer@quileutetribe.com with any questions you may have.

Respectfully,

Douglass Woodruff, Jr., Chairman
Quileute Tribal Council

CC:
IPHC Commissioners
Steve Keith, IPHC
Michelle Culver, Washington
Lynn Mattes, Maggie Sommer, Oregon
Caroline McKnight, Marci Yaremko, California