



## North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director  
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David Detlor  
Director (Acting)  
Office of Science and Technology  
NOAA Fisheries  
Silver Spring, MD  
VIA email to Abigail Furnish ([abigail.furnish@noaa.gov](mailto:abigail.furnish@noaa.gov)) and Richard Cody ([richard.cody@noaa.gov](mailto:richard.cody@noaa.gov))

Dear Dr. Detlor,

Thank you for the opportunity to provide comments on the draft Report to Congress as required in Section 201 of the Modernizing Recreational Fisheries Management Act of 2018.

The only significant recreational fishery directly managed by the Federal Government off Alaska is the fishery for Pacific halibut. The North Pacific Council has a role in providing recommendations to NOAA Fisheries and the International Pacific Halibut Commission (IPHC) on annual management measures for limiting recreational harvest taken in the charter fleet sector.

The Council relies on data collected and evaluated by the Alaska Department of Fish and Game (ADF&G) to develop appropriate management alternatives for the recreational charter halibut fishery in Area 2C and Area 3A, as necessary to keep the fishery at or below the catch limit allocated to the charter halibut sector. These measures may include bag limits, reverse slot limits, annual limits per angler, trip limits, day of the week closure periods. ADF&G work long hours to collect and analyze the data to estimate harvest, yield, and removals under different proposed management measures, which allows the Council to select measures with a high degree of confidence in the fishing mortality projections. Additionally, ADF&G provides data directly to the IPHC for use in stock assessment and management, including the number of halibut harvested and released, the average weight, sport harvest and release mortality in pounds, as well as the length, age, and sex composition of the landed harvest. Data sources include a mandatory statewide logbook on charter boats, a statewide harvest survey conducted by mail, and creel sampling at major ports; all having a relatively long time-series. These data sources and methodology for evaluating management measures have undergone rigorous scientific review, including review by the Council's Scientific and Statistical Committee.

We note that the recommendations in the report focus on stock assessment only. Our experience with managing recreational removals suggests that the report could provide recommendations regarding the usefulness and application of state and nongovernmental data for analysis of management actions by the Councils and NOAA Fisheries.

Again, thank you for the opportunity to comment on the draft.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Witherell".

David Witherell  
Executive Director, NPFMC