

**Fax:**

**To: IPHC- Catch Limit Comments, December 28,2008**

**From: Greg Elwood- 425 259 2731-home  
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## IPHC Catch Limit Comment Form

Comment on Regulatory Area: 2A/2B/2C/3A/3B/4A/4B/4CDE Year: 2008  
(Circle all that apply)

Submission Information (Please print or type)

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Signature: 

**What is your recommended catch limit or proposal?**

We support the IPHC staff recommendations for 2008.

Our proposal: After last years reversal of the staff recommendations and the aftermath political firestorm we recommend that science and the open public forum be the primary driver of yearly halibut quotas rather than political persuasion.

The pressure on commissioners from affected stakeholders is more emotionally intense than at anytime in resent history.

It is imperative that the IPHC commissioners make their decisions based on real science and fulfill their charge as protectors of the resource.

Although it may be tempting to allow exceptions to the science, it must be noted that historically worldwide fish stocks are in trouble because management had been unable or unwilling to do what was right for the resource.

This year the IPHC process stands at a cross roads. Can science prevail or will the political pressure from area 2--- Juneau, Victoria, and Olympia--- undermine and ultimately devalue the IPHC process?

**What is the supporting information for this recommendation (e.g., catch rates, )**

1. My supporting information is documented by the final vote by commissioners in 2007. By not including the affected stakeholders in the discussions that ultimately led to dramatically less quota reductions in area 2. Furthermore, the commissioner's decision ultimately resulted in a 32 % reduction in area 3B from what IPHC staff had recommended for 2007.

It may have indeed been reasonable to allow an additional year to review and digest the new model presented in 2007.

What wasn't reasonable was the exclusion of the most effected parties from the process that led to such a determination. Such exclusion is not easily forgotten and trusts in the system not easily restored.

2. It is conservative, prudent, wise and precautionary to harvest halibut at an equally proportional rate of 20%

Last summer the IPHC conducted a Stock Assessment Workshop and a central part of this conference was a peer review of the IPHC science and methodologies

Peer reviewer Francis stated his concerns for a coast wide model that did not adhere to a balanced and equal harvest rate within the core stock continuum. See peer review by Dr. Chris Francis page 3.6.2 IPHC

Francis had taken issue when the fast down slow up approach was not fully employed. Francis could see little reason for what appeared to him, as an ad hoc application of harvest rates higher than the fast down policy would dictate.

Doing anything less than a fully applied fast down standard would be unsupportable.

His concerns that an unbalanced approach to harvesting by increasing a specific closed areas harvest rate could lead to unknown consequences relating to future halibut recruitment.

Our concern is similar when presently there is no way to determine what impact over harvesting halibut in one area has on the future recruitment dynamics in other recruitment areas.

**Biomass trends, recruitment, etc.)? Please be specific where possible.**

1. 3B has the second highest Setline survey CPUE only 3A is higher
2. 3B setline survey is trending higher as supported by 2007 setline surveys
3. PIT tag recoveries support the underlying strength of the harvestable biomass in 3B.
4. Under the previous model there has been an on going disconnect using the old IPHC model with 3B having over 2X the habitat area and a 26% higher 2007 setline CPUE than 2C and yet 3B has had a quota nearly mirroring that of 2C.
5. In the previous 6 years average recruitment in 3B has been around 4.5 million recruits yearly.
6. In the previous 6 years 2C has had an average recruitment of 2.5 million yearly.

These comparisons of 2C & 3B are just that, comparisons to demonstrate why the 3B stakeholders have felt so disenfranchised from the IPHC process within the context of the old closed area model.