

IPHC Catch Limit Comment Form

Comment on Regulatory Area: 2A/2B/2C/3A/3B/4A/4B/4CDE Year: 2009
(Circle all that apply)

Submission Information (Please print or type)

Name: <u>JAMES LARSON</u>		
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Telephone: _____	Fax: _____	Email: _____
Signature: _____		

1. What is your recommended catch limit or proposal?

see attached letter

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

see attached letter

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

12/12/2008

Dear IPHC:

I am writing with regard to your 2009 Catch Limit Proposal for all areas. I am a commercial setline fisherman in Area 2C. I wish I was sufficiently versed in the scientific arguments you have made to respond in kind with an equally scientific argument as to why I feel you are traveling down the wrong path. Unfortunately for me my analysis as to the health of the 2C fishery is based on my participation as a deckhand and skipper over the past 25 years. Having fished the same several thousand square miles over this 25 years I've seen very little fluctuation in size or abundance in 2C. The fish seem to have behaved in a remarkably similar fashion over this period as to the habitat they prefer and the times of year they show up and then leave. In my opinion the IPHC is reapportioning the halibut resource away from 2B and 2C to Areas further west without sufficient scientific justification. To question the "science" used in the to date successful management of this fishery by the IPHC is to invite ridicule and repudiation. I am put in this unenviable position because I know you are wrong about the health of 2C stocks and I know you are wrong to reapportion the harvest west. If you are intent on managing this resource as one huge biomass of halibut I am of the opinion which I have heard expressed by many others that reductions or increases in the annual harvest should be done across the board. It seems you want to evaluate the health of the fishery from a whole new perspective while proposing adjustments to catches based on the traditional model. Far too much inference has been drawn by the IPHC from minimal tagging data. Much less is known about actual migratory patterns than would be suggested by the sweeping changes you have instituted. Not near enough has been done to analyse the affects IFQ harvest patterns have on time honored survey methods of the IPHC. Needless to say the unbridled growth of the charter industry with no accurate catch information along with the burgeoning cottage industry of subsistence harvesting have both served to compromise survey data. I am not putting forth any conspiracy theories but it would be naive to think that politics are not a factor when drastic income reapportionment is the result of an entirely new and unproven management model. Fortunately for me I am involved in a broad enough range of fisheries that what I believe to be your very wrong headed management decisions will not send me to the poor house. However, your proposals will have very negative economic impacts on many fishermen, processors and support businesses in Canada and Southeast Alaska. Using science and living by it is our "holy grail" in the halibut fishery but your new and improved model is flawed and I urge you to reconsider your 2009 catch proposals. My proposal is a 10% reduction in all areas for 2009 and a comprehensive reassessment of tagging data and survey methods to insure decisions are being made with meaningful information. - James Larson F/V Spaniard's Bay