C1 Public Comment December 2016

TO: IPHC/NPFMC

FROM: Dr. Tim Barnett 29 Oct, 2016

SUBJ: Halibut Fisheries Analyses

Following are some comments on the fisheries management plan options described in a paper by Meyer and Powers (Dec 2015). My comments are brief, because, frankly, the work does not deserve much attention. I would be glad to go into more detail if you desire.

The purpose of the paper, while never stated, appears to be to put an array of management options on the table so the IPHC can choose limits on the charter fleet halibut fishery, especially in the Cook Inlet and environs. Restrictions on the data used in the study (far too short, biased, non-stationary etc.) were wholly inadequate for this task. The number of ad hoc assumptions used in the study are more than enough to invalid the study. The actual data available for the study are completely inadequate, if not pathetic and in themselves biased. The analysis methods have little to do with ARIMA techniques discussed. In short, the data used have huge problems that render them not fit to define any management plan.

The various options shown appear to come from a simple regression approach. Given the huge errors on these estimate they have no reliability, certainly not for management purposes. A big reason for this is that the data are highly auto regressive and so first half and last half of the data records are highly correlated but with huge error bounds (were these ever estimated?). The numerical estimates on most all number show accuracy of 2 to 3 decimal points and must be considered as noise and of no practical use. Another basically unknown comes from their use of ad hoc numbers for 'wasteage'.

This study does not in any way constitute the information needed for a halibut manage plan. Frankly, the IPHC would be open to legal action if the numbers and conclusion draw in the referenced paper were used in any context. Having said that, I feel sorry for the authors who were clearly forced to produce this paper. They make every effort to shoot holes in their own work. Good for them!

Anyone viewing this work and conclusions would ask...Why is no effort made to look at the commercial halibut fishery, especially compared with the charter fleet)? It is far bigger that the charter fleet (18 vs 88%) and works year around. Further, the 'blue line' based on catch ratio; I assume, drives the whole analysis. It takes large changes in charter effort to move that line, but much smaller fraction changes to get the same conservation of resource. If one is concerned about resource conservation, then clearly the place to start is with large serious commercial efforts. Otherwise it appears the IPHC is biased toward the commercials.

Thanks for the chance to look this over. I had no idea things are as bad as they appear here in Alaska. You can still get a hold of me at Scripps Inst. Oceanography if you want to chat.

Best, Tim Barnett

CURRICULUM VITAE TIM P. BARNETT

EDUCATION: B.A., Physics, Pomona College

M.S., Physical Oceanography, Scripps Institution of Oceanography, Ph.D., Physical Oceanography, Scripps Institution of Oceanography

PROFESSIONAL July 1971 - present

EXPERIENCE: Research Marine Physicist

Academic Administrator (1971-1982) RTAD/Emeritus (1998-present) Scripps Institution of Oceanography University of California, San Diego La Jolla, California, 92093-0224

SELECTED HONORS AND AWARDS

- Elected to International Association for the Physical Sciences of the Ocean (IAPSO) Committee on Tides and Mean Sea Level for three-year term (1983-1986).
- Expert Witness, Review of Global Warming, West German Bundestag, 3/90
- Elected, Councilor, 3 year term, American Meteorological Society, 1/92-1/95
- Elected Fellow, American Meteorological Society, Fall, 1991
- Special Creativity Award, National Science Foundation, 1991 and 1992
- Awarded Sverdrup Gold Medal, (AMS), Fall, 1992
- Invited Congressional Testimony, "Preparing for El Nino", Sept. 11, 1997
- Invited Speaker, California State Legislature, "El Niño '97-'98: Prediction of Impacts in California", Sacramento, Jan. 22, 1998.
- San Diego Press Club Headliner of the Year 1998 (for El Nino work)
- Elected Fellow, American Geophysical Union, January, 2001
- 2007 Nobel Peace Prize, Co-recipient for IPCC contributions
- 2013 Symon Gold Medal from Royal Met Society

SELECTED OTHER PROFESSIONAL ACTIVITIES

- Numerous interviews with the press and TV nationally and internationally regarding weather, sea level, climate, El Nino, and greenhouse effects.
- Advise different branches of government (e.g., NOAA, DOE, NASA, JPL, EPA) on climate research and remote sensing.
- Created and directed International Adhoc Detection and Attribution Group
- Expert witness, Supreme Court case: Alaska vs US Prudhoe Bay ownership
- Over 200 talks to scientific and lay groups

SELECTED RECENT PUBLICATIONS

Barnett, T.P., 1995: Monte Carlo climate forecasts. J. Clim., 8(5), 1005-1022.

Latif, M. and T.P. Barnett, 1996: Decadal climate variability over the North Pacific and North America: Dynamics and predictability. *J. Clim.*, **9**, 2407-2423.

Barnett, T.P., G. Hegerl, B. Santer and K. Taylor, 1998: The potential effect of GCM uncertainties on greenhouse signal detection, *J. Clim.*, **11(4)**, 659-675. Barnett, T.P., K. Hasselmann, M. Chelliah, T. Delworth, G. Hegerl, P. Jones, E. Rasmusson, E. Roeckner, C. Ropelewski, B. Santer, and S.

- Tett, 1999: Detection and attribution of recent climate change, *Bull Am. Met. Soc.*, **80(12)**, 2631-2659.
- Barnett, T.P., R. Schnur, and D.W. Pierce, 2001: Detection of anthropogenic climate change in the world's oceans, *Science*, **292**, 270-274.
- Barnett, T.P., et al, 2005: Penetration of Human-Induced warming into the world's oceans. *Science*, **309**, 284.
- Barnett, T.P., J.C. Adam, D.P. Lettenmaier, 2005: Potential impacts of a warming climate on water availability in snow-dominated regions. *Nature*, **438**, 303-309.
- The International Ad Hoc Detection Group (T. Barnett, F. Zwiers, G. Hegerl and others) (2005): Detecting and Attributing External Influences on the Climate System: A Review of Recent Advances. *J Climate* 16, 1291-1314.
- Barnett, T.P. and others, 2008. Detection of Anthropogenic impacts in the hydrological cycle of the western United States, *Science*, Feb 1, 2008
- Barnett, T.P. and D.W.Pierce, 2008. When will Lake Mead go Dry?, Water Resources Research, March, 2008
- Barnett, T.P. and D.W.Pierce 2009. Sustainability ... Colorado River System. PNAS, April, 2009



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

guided angler fishing restrictions

1 message

Capt. Mel Erickson <gamefish@alaska.net>

To: npfmc.comments@noaa.gov

Mon, Nov 28, 2016 at 10:30 PM

To: NPFMC

RE: Continuous restrictions on Sport Anglers who fish for Halibut on Charter Boats

From: Capt. Mel Erickson PO Box 1127 Soldotna AK 99669

I've been fishing a halibut charter boat in Cook Inlet off Anchor Point for 30 years. The CSP is the worst thing that has happened to the charter fleet with an unfair allocation to the guided anglers who face new restrictions each and every year. These restrictions placed on anglers reduces demand for the charter fleet. I dont know of any other industry where government regulation place's the regulation & restrictions on the consumer of a product. The commercial sector does not place regulations on the consumer of commercial bought fish that would reduce demand for their product. The same should be for the Charter fleet. All Anglers Guided and unguided should have the same regulations, When restrictions need to be placed on the industry then it should just apply to the charter busnesses & not the angler. This can be done with seasonal trip limits and/or fleet reduction with a buy back of CHP permits.

The Charter Fleet needs consistent rules each year with steady bag limits and an open fishery 7 days a week that anglers know wont be going up & down like a Yo-Yo each year.

I would reccommend a Daily bag limit for guided anglers of 1 fish over 30 inches, or 2 fish 30 inches and under, anglers are happy with one fish if it is a larger fish, and would prefer to fish for a chance at a large fish compared to 2 smaller fish, but on the days the weather, tides or fishing is not conducive to fish inn areas where the bigger fish are and boats fish in the chicken holes then the anglers need to option to keep 2 smaller fish and they are usually happy with that also.

I would also reccomend that instead of closing the halibut fishery one day each week to charter anglers, that a better alternative would be 6 Starts per week per charter vessel & per CHP. The Federal fishery on the Upper Kenai River is managed with this method by the Kenai National wildlife refuge. This would be much more friendly to the charter fleet & the angler and achieve the same result.

I would also lend my support on the concept of the RQE, however i still have questions & concerns on the implementation & the nuts & bolts of the program. concerns would be how much the halibut stamp would need to be? How the fee structure for the stamp would be?

A single fee \$10-\$20 like the waterfowl stamp would be acceptable. Would their be sufficient Commercial Quota from commercial fishermen willing to sell quota? How long would it take to raise the funds & accumalate enough quota to make a difference?

Thank you for your consideration for these concerns. Mel Erickson

Alaskan gamefisher

- > Captain Mel Erickson
- > Alaska & Costa Rica fishing charters
- > http://www.alaskangamefisher.com
- > http://www.bearviewinginalaska.com
- > http://www.fish-costa-rica.com
- > 1-800-320-2980, 1-907- 398-1744 alaska cell
- > 1-605-838-3108 direct costa rica, toll free
- > 011-506-8943-3962 cell costa rica



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AREA 2C: C1 CHARTER HALIBUT MEASURES FOR 2017 AND C-3 CHARTER HALIBUT RQE PROGRAM

1 message

Pf6262 <pf6262@aol.com>
To: npfmc.comments@noaa.gov

Sat, Nov 26, 2016 at 7:59 AM

GENTLEMEN: MY NAME IS CAPT. PAUL EWING. I CURRENTLY GUIDE FOR EAGLE CHARTERS, ELFIN COVE, AK. AND THIS WILL BE MY 14TH YEAR. I HAVE ALSO GUIDED OUT OF NINILCHIK, AK. AND HAVE FISHED ALASKA WATERS OVER THE PAST 20 YEARS. I AM VERY CONSERVATION MINDED RELATIVE TO OUR OCEAN FISHERIES. BASED ON MY EXPERIENCE FISHING FOR HALIBUT IN ALASKAN WATERS, I SHOULD LIKE TO MAKE THE FOLLOWING COMMENT FOR YOUR CONSIDERATION:

COMMENT: BUSINESSES THAT PROVIDE SELF-GUIDE FISHING SERVICES (IN THE NAME OF CONSERVATION) HAVE THE SAME HALIBUT REGULATIONS AS THE CHARTER BUSINESSES OTHER THAN THEIR NEED FOR CHARTER HALIBUT PERMITS.

CATCH LIMIT: (1) HALIBUT PER DAY AS DEFINED IN CHARTER REGULATIONS WITH A (4) FISH ANNUAL LIMIT FOR NON-RESIDENTS EITHER SELF-GUIDE(**KFISHING FROM A SELF-GUIDE BUSINESS**) **OR CHARTER BUSINESS**.

CATCH RATES: SELF-GUIDE ANGLERS OPERATING FROM SELF-GUIDE BUSINESSES ARE CURRENTLY ALLOWED TO CATCH (2) HALIBUT ANY SIZE WITH NO ANNUAL LIMITS FOR NON-RESIDENTS WHO CAN RETURN MANY TIAMES DURING THE SEASON THEREBY DEPLETING THE RESOURCE FOR FUTURE GENERATIONS.. AS IN THE CHARTER FISHERY, IF ANYONE WANTS A SECOND FISH OF "ANY SIZE", THEY CAN PURCHASE IT FROM THE COMMERCIAL CATCH SHARE PROGRAM.

AREA 2C MANDATED YEARLY QUOTA: ENACTING THIS COMMENT ON REGULATIONS WILL ALSO LOWER THE IMPACT ON THE IPHC MANDATED RECREATIONAL YEARLY QUOTA AS WELL AS CONSERVE THE HALIBUT RESOURCE.

THANK YOU, CAPT. PAUL EWING



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Charter Halibut Allocations 1 message
Murray Hayes <murry98368@msn.com> Mon, Nov 28, 2016 at 10:47 AM To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>, Halibut Coalition <halibutcoalition@gmail.com></halibutcoalition@gmail.com></npfmc.comments@noaa.gov></murry98368@msn.com>
Dear Council Members,
I am a member of the Halibut Coalition and support their recommendations for the upcoming meeting. As a quota share holder in area 2C, we had our allocation cut many times due to the health of the stocks and increased harvest by commercial charter operators. I am all for conservation and rebuilding which appears to be working quite well in 2C.
As fishermen we have seen a continued growth in the commercial charter business. I have a hard time standing by as a group with commercial interests increasingly wants more and more of the quota. This has got to stop. They should be thankful for what has been given them.
It is typical American greed, no matter how much some get, they just want more.
Please follow recommendations submitted by the Halibut Coalition for the health of the stocks and so the fishermen that depend on the resource for a living can continue to do so.
Respectfully,
Murray R Hayes
fv Sylvia
224 Grant Street

Port Townsend, WA 98368