July 26, 2006

Mr. D. Robert Lohn, Administrator
Northwest Region
National Marine Fisheries Service
7600 Sand Point Way N.E.
Seattle, Washington 98115-0070

Dear Mr. Lohn:

Thank you for the opportunity to provide comment upon the proposed rule to implement Amendment 18 to the Pacific Coast Groundfish Fishery Management Plan (FMP).

Specifically, our agency’s comments are with regard to expanding species sorting requirements to assist in establishing the total catch reporting methodology described within Section 6.4 of the FMP. We believe expanding sorting requirements beyond the current criteria would assist fishery managers in quantifying total catch for some species included in the FMP but which are not currently required to be sorted. Total catch accounting is key in structuring our management upon the best available science.

Skate (raja spp.) serve as an example of species for which broadening sorting requirements could greatly improve total catch accounting. Discarded catch can be estimated to the species level since the West Coast Groundfish Observer Program identifies skate discarded at sea by species. However, since skate species do not have trip limits, optimum yields or harvest guidelines, catches brought to shore are typically identified only as unsorted, generic “skate.” This fails to provide sufficient level of detail for total catch accounting or to support stock assessment science. Since skate can be quite large (in excess of 100 pounds), it is difficult for port samplers to conduct adequate species composition sampling of landed catches. Additionally, some skate landings consist of only the removed wings, further complicating accurate species composition sampling. Requiring the catch to be sorted could address this situation.

Therefore, Washington Department of Fish and Wildlife proposes the following specific changes to federal regulations governing the West Coast groundfish fishery:

At §660.306(a)(7), "Fail to sort, prior to the first weighing after offloading, those groundfish species or species groups for which there is a trip limit, size limit, scientific sorting designation, quota, harvest guideline, or OY, if the vessel fished or landed in an
area during a time when such trip limit, size limit, *scientific sorting designation*, quota, harvest guideline, or OY applied."

At §660.306(a)(7), it is unlawful for any person to "fail to sort, prior to the first weighing after offloading, those groundfish species or species groups for which there is a trip limit, size limit, *scientific sorting designation*, quota, harvest guideline, or OY, if the vessel fished or landed in an area during a time when such trip limit, size limit, *scientific sorting designation*, OY, or quota applied."

We envision that species determined to fall under the "scientific sorting designation" would be identified through a deliberative process involving the Pacific Fishery Management Council and its advisory bodies.

Again, thank you for this opportunity to provide comment.

Sincerely,

Philip Anderson
Assistant Director
Intergovernmental Resource Management

cc: Yvonne DeReynier, NMFS
    Dr. Donald McIsaac, PFMC
    Capt. Mike Cenci
    Brian Culver
    Michele Culver