




STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

48 Devonshire Road • Montesano, Washington 98563-9618 • (360) 249-4628 FAX (360) 664-0689

September 7, 2006

Mr. Donald Hansen, Chair
Pacific Fishery Management Council
7700 Northeast Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Mr.  Hansen:

The Washington Department of Fish and Wildlife (WDFW) sent a letter to the Northwest Fisheries Science Center, dated July 26, 2006, regarding WDFW's involvement in preparing assessments for the 2007 cycle, and received a response from the Science Center, dated August 14, 2006 (copies attached). Specifically, with regard to black rockfish, WDFW does not support updating the northern assessment (North of Cape Falcon) in 2007 for the reasons described below.


Over the last 25 years, WDFW has spent significant assets conducting research and collecting fisheries information on black rockfish because this resource is a key component to Washington's recreational fisheries and ensuring that Washington State realizes a return on this investment is a responsibility that WDFW does not take lightly. WDFW implemented a new black rockfish tagging program beginning in 1998; since then, we have spent approximately \$90K per year on tagging efforts. WDFW staff have tagged over 25,000 black rockfish since 1998, in addition to the approximately 60,000 tagged releases from previous years. Given the amount of Washington State resources that have been spent on this effort, the importance of black rockfish to Washington's sport fisheries, and the level of intimacy that WDFW staff have with this program, we believe it is imperative that WDFW remain the lead agency for the northern assessment.

The resulting data from WDFW's tagging effort needs to be compiled, documented, and analyzed, which will take a significant amount of WDFW staff time. Our marine fish science resources are limited and already overly subscribed contributing to the current stock assessment cycle. We are prepared to produce a technical report and publication that summarizes the updated tagging data in time for the 2009 assessment cycle, but these data will simply not be ready in time to contribute to this assessment cycle.

The Science Center mentioned the NOAA guideline of reassessing stocks once every five years; however, this is not necessarily a requirement and, in their April 2006 report, the Scientific and Statistical Committee supported pursuing new assessments as a priority. WDFW agrees with this approach and, therefore, is focusing staff time on a new spiny dogfish assessment for 2007.

For the reasons stated above, WDFW does not support a northern black rockfish assessment in 2007 and would be prepared to lead a northern assessment in 2009. The Council may wish to consider whether to proceed with a southern black rockfish assessment this cycle, or wait until the next cycle, so the two areas could be assessed concurrently. If you have any questions, please feel free to contact me.

Sincerely,


Philip Anderson
Assistant Director
Intergovernmental Resource Management



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Fishery Analysis and Monitoring Division
Northwest Fisheries Science Center
2725 Montlake Blvd E.
Seattle, WA 98112
206 860-3381

August 14, 2006

Mr. Phillip Anderson
Assistant Director
Intergovernmental Resource Management
State of Washington
Department of Fish and Wildlife
48 Devonshire Road
Montesano, Washington 98563-9618

Phil
Dear Mr. Anderson:

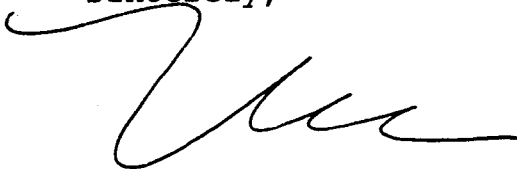
Thank you for the update on your planning for the spiny dogfish assessment. I really appreciate your efforts. With regard to the yelloweye rockfish assessment, the Terms of Reference for assessment review is a Council document developed by the Scientific and Statistical Committee (SSC). Although we coordinate the process of developing the list of assessments, the Council, with advice from the SSC, is responsible for finalizing the terms of reference and making the determination whether assessments comport with the terms of reference. Consequently, we would recommend that you discuss the scope of the yelloweye assessment with the full SSC. As you state in your letter additional data would require a "loose" interpretation of the terms of reference and the full SSC must make that determination. Resolving this matter as quickly as possible would assist us in coordinating the development of the final STAR panel schedule.

The classification of the black rockfish assessment as "coastwide" in planning documents reflected our assumptions about the full geographic range of the species and therefore the assessment. Since the northern area has not been assessed since 1999, one of the reasons for including black rockfish in the list of 2007 assessments was the realization that the stock's status off Washington should be updated. This comports with



guidance we have received from within NOAA Fisheries that assessments need to be routinely updated and that a more than 5-year gap between assessments should be avoided. We hope that you can provide data and assistance to the lead author so that assessments can be completed for all areas of interest to the council. I believe the methods used are a scientific question best decided by the scientists involved in consultation with the full SSC. However, my preference would be that whatever the eventual stock structure that is used to model this species it would be useful to unify what have been two completely separate assessments within a single assessment exercise.

Sincerely,



M. Elizabeth Clarke, Ph.D.
Division Director

cc: Stacey Miller
Jim Hastie
Don Hansen, Chair, PFMC
Dr. Don McIsaac, Executive Director
Dr. Rick Methot
Morris Barker
Brian Culver
Michele Culver
Tom Jagielo
Theresa Tsou
Farron Wallace



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July 26, 2006

Dr. Elizabeth Clarke
National Marine Fisheries Service
Northwest Fisheries Science Center
2725 Montlake Boulevard East
Seattle, Washington 98112

Dear Dr. ^{Liz}Clarke:

The purpose of this letter is to communicate the Washington Department of Fish and Wildlife's (WDFW) intent to participate in the next stock assessment cycle as the lead author for the spiny dogfish assessment, and to share some of our thoughts relative to the planned black rockfish assessment and future yelloweye rockfish assessments.

With regard to spiny dogfish, WDFW staff have been working with representatives from the University of Washington and Canada Department of Fisheries and Oceans to share and review dogfish biological and fishery data. We are committed to being the lead authors on this assessment, and plan to develop an assessment that takes into account the transboundary nature of the stock.

As for black rockfish, there appears to be some confusion as to whether the planned assessment is intended to be a coastwide assessment (which would produce a coastwide acceptable biological catch and optimum yield), or whether Washington would remain a separate area in the model, or whether only the southern area (i.e., Oregon and California) would be assessed. It is also unclear what role is anticipated for WDFW in drafting the assessment. With regard to the coastwide application, a genetic study conducted in 1995-97 reinforced findings from a major tagging study that there are two separate black rockfish stocks, north and south of Cape Falcon, Oregon. As a reminder, the Council's Groundfish Management Team, estimated the amount of the stock located between Cape Falcon and the Oregon/Washington border and, for ease of management, transferred that amount from the northern assessment area to the south. Based on the results of this genetic study, WDFW strongly believes that Washington should remain a separate assessment area.

In addition, the present northern black rockfish assessment model incorporates a unique, direct approach to using the available tagging data, which cannot be implemented as such in the current stock synthesis 2 (SS2) model. Given this, and the fact that our limited assessment resources will be fully subscribed with the spiny dogfish assessment in 2007, we would advocate that a full northern black rockfish assessment be completed in 2009. Given the health of the resource indicated by the last assessment, and subsequent harvest substantially below optimum yield levels, there is likely no biological urgency to reassess northern black rockfish next year.

Dr. Elizabeth Clarke
July 26, 2006
Page 2

With regard to yelloweye rockfish, we reviewed the list of species and types of assessments for the next three cycles, which was presented to the Council in April, and noted that yelloweye were scheduled as "updates" for 2007, 2009, and 2011. We understand that, under the Terms of Reference, new data sources cannot be considered with an update; however, we would like to request a somewhat loose interpretation of this requirement to ensure that additional data (from an existing data source in the current assessment) are considered. Specifically, we would like the stock assessment team to consider adding Washington recreational catch-per-unit-of-effort (CPUE) data from halibut trips. (Note: Washington recreational CPUE data are currently used, but only for bottomfish trip types, whereas Oregon recreational CPUE data from both bottomfish and halibut trips are included.)

Finally, we are planning additional research activities for yelloweye in 2007 and 2008, and would like to have the opportunity to consider those data in a full assessment in 2009.

Thank you, in advance, for taking these comments into consideration. If you have any questions, please feel free to contact me at (360) 902-2720.

Sincerely,



Philip Anderson
Assistant Director
Intergovernmental Resource Management

cc: Don Hansen, Chair, PFMC
Dr. Don McIsaac, Executive Director, PFMC
Dr. Rick Methot, NWFSC
Morris Barker
Brian Culver
Michele Culver
Tom Jagielo
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