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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA
AND THE UNITED STATES OF AMERICA

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March 30, 2009

Agenda Item F.3.c
Supplemental Public Comment 2
April 2009

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

Re: April 2009 Meeting, Agenda Item F.3 – Amendment 21, Intersector Allocation

Dear Don:

The staff of the International Pacific Halibut Commission (IPHC) has reviewed the preliminary draft Environmental Impact Statement titled Allocation of Harvest Opportunity between sectors of the Pacific Coast Groundfish Fishery. In particular, we have examined Section 4.4.3 (Pacific Halibut Trawl Total Catch Limits) regarding options for establishing an Individual Bycatch Quota (IBQ) for the rationalized west coast trawl fishery. We offer the following comments and recommendation.

We recommend Alternative 4 as the basis for the trawl fishery IBQ. This approach is slightly more restrictive than what we suggested in our letter of March 4 and it sets the initial amount of IBQ relative to halibut abundance but no higher than 130,000 pounds. Importantly, the alternative contains regular reductions in the IBQ as the trawl fishery gains experience in operating within Individual Quotas, thus keeping bycatch mortality reduction as an incentive. Also, the alternative correctly applies to all sizes of bycaught halibut and is based on mortality. The latter component not only allows for reductions through lower bycatch rates but also through improved handling to create better survival of discarded fish.

We understand the Council still has much work ahead in creating this plan. We look forward to the opportunity to participate in that process.

Sincerely,



Bruce M. Leaman
Executive Director

cc: Commissioners