

April 11, 2010

Pacific Fisheries Management Council

Dear Council Members,

I am a non-whiting traditional groundfish trawler. I recently discovered the method used for determining Pacific Halibut bycatch. I feel there are significant flaws in the assumptions made in this calculation. Three major discrepancies jump out at me.

1. I feel it is inaccurate to pick two out of eight major shelf flatfish target species to base halibut bycatch. i.e. Arrowtooth Flounder and Petrale, when Rex, English, Dover, Sand Dabs, Sand Sole, and Starry Flounder could just as easily be used.
2. Arrowtooth Flounder probably has one of the lowest bycatch rates of retained weight vs halibut bycatch weight as compared to other shelf species.
3. The years analyzed for bycatch weights of target species are '94-'03 when the years used to model the area specific fishing behavior are '04- and after. Bycatch doesn't match the allocation.
4. Many boats do not target Arrowtooth Flounder. Furthermore, many boats do not retain Arrowtooth Flounder when caught.

I was able to receive my observer bycatch rate data for 2002 and it shows a roughly 5% halibut weight to retained weight ratio. 69,288 lbs. retained weight for 3594 lbs. Pacific Halibut while fishing on the shelf. Only 450 lbs. of Arrowtooth were retained during this period. I am not privy to other boats information, but would expect that targeted Arrowtooth tows do not average this high a percentage of halibut bycatch. In 2002, 21% of NSM target tows contained halibut. 47% of Petrale target tows contained halibut.

For these reasons amongst others, I would strongly urge the council to readdress the Pacific Halibut bycatch allocations.

Thank you for your consideration,

Paul Kujala
F/V Cape Windy

Also in agreement

Blair Miner	Gary Sjolstrom	David Vandercovering	Thomas Morrison
F/V Columbian Star	F/V Home Brew	F/V Chelissa Michelle	F/V Capt Ryan

Brian Salo
F/V Lily Marlene