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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

October 28, 2011

Mr. Dan Wolford, Chairman  
Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Re: Agenda Item D.1 – Pacific Halibut Management

Dear Chairman Wolford:

Our August 25, 2011 letter to the Council regarding sport fishery management for the South of Humbug Mtn. area has raised several management and assessment issues for which we would like to provide comment and recommendation to the Pacific Council.

West coast halibut assessment/apportionment – The halibut assessment is a coastwide model, using fishery and survey data as primary inputs. The Area 2A assessment survey, which began in 1995, operates in a systematic 10 x 10 nm grid design and ranges from the US/Canada border south to 42° North, i.e., the OR/CA border. When the current halibut survey was designed, we stopped at 42° North because at the time the reported commercial landings of Pacific halibut in California waters had been very minor (generally <500 lbs. annually). When we compute the relative distribution of biomass, we use bottom area (between 0 and 400 fathoms) and the Area 2A bottom area calculation only includes the area off Washington and Oregon. This bottom area is used to weight the survey index of abundance: mean weight per unit effort (WPUE) of halibut over 32 inches in length, (i.e., the legal commercial size limit) for Area 2A to derive the apportionment percentage of coastwide biomass in Area 2A. This year is the first time we have heard of any potentially significant Pacific halibut catches in California waters. In order to include CA into the biomass assessment and apportionment, we would need some measure of halibut density equivalent to what we obtain from our survey and determine how much bottom area should be reasonably included in such a calculation. Both of those estimates could be made but would require some research and discussion of the most appropriate methodology to use. We have several suggestions in this regard and are open to working with the Council and appropriate industry representatives to identify that methodology.

South of Humbug Mtn. fishery options for 2012 – The Council has offered two options in addition to status quo for this area for 2012. We appreciate the Council's recognition of the issues we raised in our earlier comment letter. From a policy perspective, we believe it is unacceptable to allow fishing to continue when a catch limit has been reached. However, we also recognize the need to resolve the assessment/apportionment issues as well as the appropriate

monitoring and management framework for sport fishery in this area, including CA waters. The IPHC staff would support a no action/status quo decision for 2012 if the Council will also support initiatives to address the foregoing issues so that an appropriate management decision can be made next fall.

Gregg Williams of the IPHC staff will be attending the Council meeting and can address questions on the Commission's perspective which may arise in your deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Leaman". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

Bruce M. Leaman, Ph.D.  
Executive Director

cc: IPHC Commissioners