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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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September 9, 2010

Mr. Mark Cedergreen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: September 2010 Meeting, Agenda Item D.3: Halibut Catch Sharing Plan considerations

Dear Mark,

The staff of the International Pacific Halibut Commission has reviewed the Situation Summary and ODFW Report for the Initial Consideration of Proposed Changes to Pacific Halibut Allocation for Bycatch and Catch Sharing in the Groundfish Fisheries. Allocation among users is clearly the purview of the Council and not the Commission. However, we recommend that, should the Council consider allowing retention of legal-sized, incidentally caught halibut within the hook and line groundfish fisheries, such retention be handled solely within the Council's Halibut Catch Sharing Plan (CSP), where all other retained harvests are managed. To allow any retention of halibut outside the framework of the CSP would impede both the Commission's and the Council's management goals for Pacific halibut.

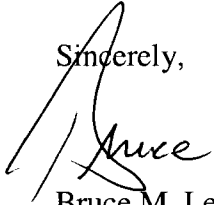
In addition, we note issues with the data provided in the ODFW Report. Table 3 provides the number of halibut permits issued for the commercial fishery and those that made sablefish landings. For 2009, our records indicate that IPHC issued 238 commercial vessel licenses which allowed a vessel to fish in the directed commercial halibut fishery and the incidental halibut fishery during the limited entry sablefish fishery, north of Point Chehalis. It is not clear how the numbers in Table 3 were derived and we have not been able to confirm them with our permit data. It is also difficult to evaluate the impacts of various landings when the weight of fish landed (halibut or sablefish) is not presented. The Commission typically uses the weight of halibut landed as the common metric for understanding the impacts of removals. Additionally, Table 6 provides estimated discard mortality in metric tons and pounds, which we assume are in units of round weight. However, halibut catch limits and all reporting by the Commission is typically in units of net weight (0.75 x round weight). If the Council chooses to consider this proposal in greater detail, Commission staff can work with Council or agency staff to provide halibut data or verify any of the data in future reports.

The last section of the ODFW report provides a list of items for Council discussion and consideration, and one item is season dates. The IPHC sets commercial fishery season dates,

with the Council and NMFS adopting more restrictive commercial fishing dates, where necessary. Proposals for season dates can and are regularly made to the Commission. However, harvesters should be aware that the season dates are ultimately determined by the Commission.

Gregg Williams from our staff will be attending the September meeting and would be pleased to address any questions the Council may have on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bruce".

Bruce M. Leaman
Executive Director

cc: Commissioners