June 7, 2011

Mr. Mark Cedergreen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place
Portland, Oregon  97220

Re: June 2011 Agenda Item E.6.b – Supplemental NMFS Report 2: PIE Rule, part 2
VIA Email

Dear Mark:

The staff of the International Pacific Halibut Commission (IPHC) has become aware of changes being proposed as part of the Trawl IQ Program Improvement and Enhancement (PIE) rule, which seeks to revise the manner in which the pounds of halibut bycatch are calculated for quota share holders.

The IPHC staff concurs with the general steps being proposed by the Council but notes that a fixed value is proposed to convert legal-sized pounds to pounds of all sizes of halibut, i.e., legal-sized plus sublegal-sized. We suggest a more appropriate approach would be to specify the use of the fraction which would be reported in the most recent NMFS analysis of trawl fishery bycatch. The fraction of legal-sized, or O32, halibut in the trawl bycatch varies annually for several reasons, including halibut stock dynamics and the manner in which the trawl fishery is conducted. For example, a strong recruit class will influence the overall average size as it moves through the stock and fishery. Using a fixed conversion value can substantially misrepresent the total halibut bycatch amount relative to using a current legal fraction. Our suggestion is therefore to make the conversion based on the latest results, to better reflect the current status of the trawl fishery and halibut stock characteristics.

We would be pleased to elaborate on this issue, if required. Gregg Williams of our staff is the contact person for the issue.

Sincerely,

Bruce M. Leaman, Ph.D.
Executive Director

cc: Commissioners