



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Fisheries Science Center
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PFMC

February 13, 2002

Dr. D. O. McIsaac
Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Dear Don:

The situation regarding halibut bycatch calculation is quite unfortunate, and I completely agree that we need communication guidelines that will prevent a recurrence.

My understanding is that this was not a new analysis. The analysis was reported in the 2000 document. There was no new analysis in 2001 and the 2001 document included the previous section unchanged. The PFMC and SSC reviewed and approved the document in September 2001. I am quite disappointed that staff-to-staff contact between International Pacific Halibut Commission (IPHC) and National Marine Fisheries Service (NMFS) during the months prior to the IPHC meeting neither resolved the discrepancy nor elevated the situation to a higher level in each organization. We also were unaware that an alternative calculation would be presented by the IPHC staff, and were unaware that a technical error existed in the NMFS calculation. As you know, the Northwest Fisheries Science Center underwent some changes in personnel in our Fishery Resource Analysis and Monitoring Division. This transition in staff involved in the calculations and documents contributed to this problem being undetected and unreported.

Your suggestions for improved communication are good. In fact, NMFS technical staff have already met with IPHC staff and identified the source of the technical error. A revised document will be developed by April 1 for the record. In addition, I recommend that we clarify the role of the Council's SSC in reviewing draft documents before they are transmitted to the IPHC.

After discussion with the IPHC, my senior managers have agreed to set a formal schedule and protocol for transmittal of the bycatch information. For 2002, we propose to update the current analysis during summer 2002, transmit the draft document to IPHC staff and to the Council for SSC review at the September meeting, and finalize the document based upon written comments from IPHC and the Council. The document will be transmitted to IPHC by Oct. 15 in time for their Nov. 1 assessment update. We will keep the southern U.S. principals informed as this progresses. The

new NMFS observer data will not contain a complete year of coverage in time for the 2002 bycatch update. We plan to develop the bycatch report for 2003 and beyond on the basis of the new observer data.

At present, Dr. Elizabeth Clarke, our Division Director of FRAM, is the point of contact for any unresolved groundfish science issues. As her groundfish analysis program becomes more fully developed this spring, she expects to designate a point of contact for all of our bycatch analyses to assist her in assuring that this year's situation does not re-occur.

Very truly yours,



Usha Varanasi, Ph.D.
Science and Research Director
Northwest Fisheries Science Center

/c

cc: Mr. Ralph Hoard
Mr. Jim Lone
Mr. Phil Anderson
Mr. Burnie Bohn
Mr. Don Bodenmiller
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