

COMMISSIONERS:

CLIFF ATLEO
PORT ALBERNI, B.C.
JAMES BALSIGER
JUNEAU, AK
RICHARD J. BEAMISH
NANAIMO, B.C.
RALPH G. HOARD
SEATTLE, WA
PHILLIP LESTENKOF
ST. PAUL, AK
JOHN SECORD
VANCOUVER, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

DIRECTOR
BRUCE M. LEAMAN

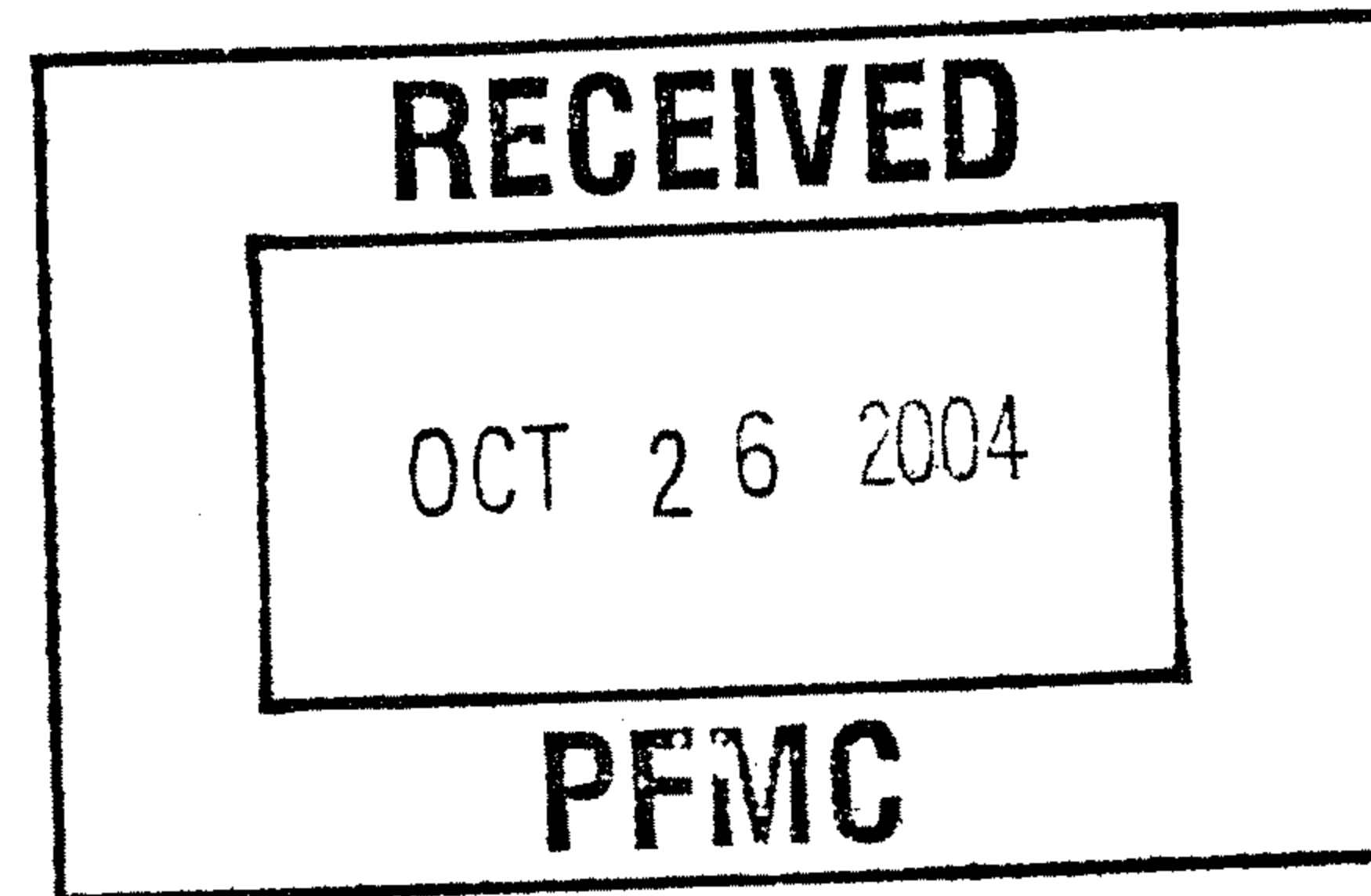
P.O. BOX 96008
SEATTLE, WA 98146-2009

TELEPHONE
(206) 834-1888

FAX:
(206) 832-2883

October 26, 2004

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



Dear Don:

The staff of the International Pacific Halibut Commission has reviewed the proposed changes to the Pacific halibut Catch Sharing Plan (CSP). Most of the proposals consist of minor changes to the allocation framework of the CSP, and we have no comment on those. However, we do have a comment on Proposal 10.

Proposal 10, which seeks to split the Columbia River subarea at the Washington/Oregon border and increase the Oregon allocation from 2 percent to 4 percent and then having the respective states manage each quota exclusively, presents no conservation problems. Since its creation in 1995, the Columbia River fishery has evolved from a slow-paced incidental fishery to a directed fishery. This now presents unique monitoring problems, as catches are unpredictable and quotas can be achieved very quickly. Accurate, timely reporting of the catch early in a week will be critical in avoiding disruption to fishers' plans as well as staying within quotas. We expect this change may require Oregon and Washington to revise their monitoring and reporting, and will work with them to ensure catch limits are not exceeded.

A member of the Commission staff will be attending your November meeting and will be available to answer any questions the Council may have.

Sincerely,

Bruce M. Leaman
Executive Director

cc: Commissioners