



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Fisheries Science Center
2725 Montlake Boulevard East
Seattle, WA 98112-2097

May 26, 2009

Mr. John DeVore, Groundfish Management Team
Pacific Fisheries Management Council
7700 Ambassador Place, Suite 101
Portland, OR 97220

Dear Mr. DeVore,

Thank you for your letter of April 30th in which you requested, on behalf of the Pacific Fisheries Management Council, input from the Northwest Fisheries Science Center (NWFSC) regarding methods of estimating total mortality for trawl-caught Pacific halibut. The Council brought forth two methods which could be used to estimate halibut mortality when the fleet moves to an IFQ fishery. The first method would be to apply a fleet-wide bycatch mortality rate to Pacific halibut as determined either from a prior year or an average of recent years from the West Coast Groundfish Observer Program (WCGOP) to any halibut caught and discarded at sea. Alternatively, the viability of discarded halibut could be recorded by WCGOP observers and used to determine a vessel's share of total mortality instead of using a fleet-wide average bycatch mortality rate.

The NWFSC recommends using the first approach, applying a fleet-wide bycatch mortality rate to Pacific halibut for the trawl IFQ fishery. This approach is currently used in other fisheries where Pacific halibut is a limiting species, such as the Alaska flatfish trawl fishery. Observers would continue to estimate viability on a randomly selected sub-sample. Each year, the mortality rate will be updated with new data from the fishery.

Although the second method could encourage individual vessel behavior to reduce mortality, the NWFSC has a number of concerns about applying this approach. One problem is that the dichotomous key used to determine halibut viability is subjective in nature. Subjectivity would be a concern due to the lower Pacific halibut bycatch allocation expected under IFQ management.

Other concerns about this approach are related to the amount of additional sampling time for IFQ species already required under the proposed program. This could result in Pacific halibut on deck for longer periods of time than normal, and the potential for increased mortality. Additionally, it is not clear that this approach would allow for adequate sample sizes.

If you have further questions, please contact Janell Majewski, WCGOP supervisor at (206) 860-5616.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Clarke". The signature is fluid and cursive, written over a horizontal line.

Dr. Elizabeth Clarke, PhD
Director
Fishery Resource Analysis and Monitoring Division

Cc Frank Lockhart, Assistant Regional Administrator, NWR/NMFS
Don McIsaac, Executive Director, PFMC

