

## Port Orford Ocean Resource Team



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Mr. David Ortmann  
Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Chairman Ortmann:

At its September 2008 meeting the Pacific Council provided direction to staff and participating agencies to examine bycatch of Pacific halibut in the longline fishery for blackcod. The Port Orford Ocean Resource Team notes that the report given to the SSC (Agenda Item D.1.b, June 2009) Council Meeting only provided limited information on the bycatch and discard mortality of Pacific halibut in all fixed gear fisheries. The December 2008 report on fixed gear mortality was also insightful but additional information is needed. None the less, we request the Council initiate the three-meeting process to consider a range of options for allowing the retention of Pacific halibut in the directed longline fishery for sablefish. POORT still feels that the 2009 and anticipated future reductions in the area 2A halibut TAC increase the need for timely analysis of halibut retention options for the directed longline fishery for blackcod.

For now, we suggest that the scope of options include: 1) status quo; 2) some directed fishing for Pacific halibut with some expanded allowance for bycatch retention of halibut in the hook and line fishery for sablefish, south of Pt. Chehalis; and 3) a coastwide bycatch only fishery in lieu of a commercial area 2A non-tribal directed fishery for Pacific halibut. In its analysis of options for consideration of a bycatch fishery, we would like to encourage staff and participating agencies to provide more details on halibut bycatch in the longline fishery for sablefish. After discussions with fishermen and with agency staff, we have the following questions we would like to see answered by such an analysis:

1. What is the discard and discard mortality associated with each sector of the sablefish longline fishery (limited entry endorsed, limited entry daily trip limit, open access)?
2. What is the spatial distribution of bycatch ratios in each sector of the sablefish longline fishery? In answering the question, the directed longline fishery for sablefish north of Pt. Chehalis needs to be analyzed separately, as it is under a different set of regulations which allows the retention of Pacific halibut.
3. What is the sublegal and legal halibut discard and discard mortality for 1 and 2 above?

Sincerely,

Leesa Cobb, Executive Director