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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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Agenda Item E.1.a Supplemental IPHC Report June 2016

June 9, 2016

Ms. Dorothy M. Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: Agenda Item E.1: Scoping of Pacific Halibut Catch Sharing Plan Allocation Changes

Dear Chair Lowman:

The staff of the International Pacific Halibut Commission (IPHC) has reviewed the elements for Agenda Item E.1 and wishes to offer the following comments for your consideration. At the outset, we would like to iterate our appreciation for the efforts the Council expends at the implementation of this thorough and effective Catch Sharing Plan (CSP). The Commission's work is greatly facilitated by the attention devoted to this Plan.

1. **Data reporting.** In the course of reviewing data sources and inputs for catch accounting in the CSP, our staff has discovered errors in some of the data presented by the IPHC in past years. While the accounting of catches has been correct in our Annual Reports, the tables on incidental catches of halibut in the salmon troll and sablefish fisheries presented in our Bluebook for the IPHC annual meetings were not correctly updated with final data for previous years. We apologize for this oversight in that component of our reporting and have taken actions to ensure that this will not re-occur.
2. **Adherence to the overall IPHC Catch Limit for Area 2A.** We note that the Council and its member agencies have achieved good conformity between catches and the Area 2A Catch Limit, with some exceptions. Tables 1-2 in Agenda Item E.1, Attachment 3 ([Agenda Item E.1, Attachment 3](#)) and Table 3 in Agenda Item E.1 Supplemental Attachment 4, June 2016 detail the allocations, catches, and percentage of allocations under the CSP that were taken, for the years 2004-2015. The period 2009-2015 has marked a time of persistent overages in the adherence to the Area 2A Catch Limit and the main components (in terms of pounds) where adherence to recreational allocations has been deficient is for the Washington Inside Waters (Puget Sound) and the southern Oregon/California region. The adherence to the recreational allocation in southern Oregon/California waters appears to have been remedied in 2015 through more active management.

The Washington Department of Fish and Wildlife (WDFW) has recognized the issue of allocation adherence in communications to both the Council and the Commission. However, despite increasingly more restrictive pre-season measures developed by WDFW for Puget

Sound, the adherence to the allocation has not notably improved. The recreational fishery in this area is not under active in-season management and, while the Commission understands the difficulty of management for this area due to multiple access points, it is clear that the measures undertaken to date have not produced the desired result. The Commission has appreciated the responsiveness of the Council to our previous communications concerning adherence to the Area 2A Catch Limit and trust that you will continue to direct your attention to this issue.

Lastly, on the issue of catch reporting, we appreciate that the State agencies have responded positively to our request for estimates of halibut release mortality in the recreational fisheries. However, the data provided are not yet current and the Commission necessarily used an estimate of this mortality for 2015 (Dykstra 2015). We encourage the agencies to provide the most current data so that it can be incorporated into the Commission's annual process, thus avoiding the use of extrapolations based on previous year's data.

- 3. Spatial allocations within the CSP.** The IPHC staff has noted the public comment on the spatial allocations within the CSP. It is of considerable concern to the staff that some harvesters appear to interpret the results of the IPHC setline survey inappropriately. Estimates of halibut abundance on scales smaller than IPHC regulatory areas can vary substantially and will not necessarily reflect regulatory area abundance. The IPHC's standardized 10 nmi survey grid is designed to sample efficiently, and at the same rate, across a broad range of depth and habitats from California to the Bering Sea. However, this sampling approach is not appropriate for estimating abundance at fine spatial scales, where catch rates can be greatly influenced by only a small number of stations, the exact locations of those stations, or interannual variability at small scales. The IPHC has also observed greater interannual variability at the extremes of the halibut stock's geographical range, such as in Areas 2A, 4B, and 4CDE. Figure 1 shows survey catch rates for IPHC survey charter regions of Area 2A over the 2004-2015 period. We note in passing that the IPHC charter regions are developed for operational efficiency and the boundaries of these regions do not precisely match State boundaries used in the CSP. The significant point of Fig. 1 is that these the catch rates in these charter regions areas vary substantially over time and not in concert within a given year. The latter illustrates the difficulty of attempting to interpret broad-scale trends from smaller subsets of data.

It is important to recognize that the Commission does not use the survey catch rate data in raw form to apportion the estimated coastwide biomass into regulatory area biomasses. Adjustments are made to each area's WPUE to account for incomplete survey coverage in some years. These adjustments can incorporate data from other sources for regions with no survey coverage (e.g., NMFS trawl survey in part of northern California). The Commission also uses a statistical averaging procedure to account for interannual variability, as well as adjusting catch rates for catchability differences among areas and for the timing of the surveys in relation to removals by fisheries, when it calculates the apportioned biomass for each regulatory area (Webster and Stewart 2016). The ultimate factors used for apportionment can differ substantially from the raw survey data (Fig. 2), particularly for areas such as Area 2A where variability in catch rates is high.

We appreciate the opportunity to comment on this agenda item and assure the Council of our continued desire to work cooperatively in the resolution of management issues for Pacific halibut in Area 2A.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Leaman". The signature is fluid and cursive, with a large loop at the top and a trailing flourish at the end.

Bruce M. Leaman
Executive Director

cc: IPHC Commissioners
Chuck Tracy, PFMC
Kelly Ames, PFMC

References

Dykstra, C. 2016. 2015 Sport fishery review. Int. Pac. Halibut Comm. Report of Assessment and Research Activities 2015: 36-46.

Webster, R.A. and Stewart, I.J. 2016. Setline-survey based apportionment estimates. Int. Pac. Halibut Comm. Report of Assessment and Research Activities 2015: 210-219.

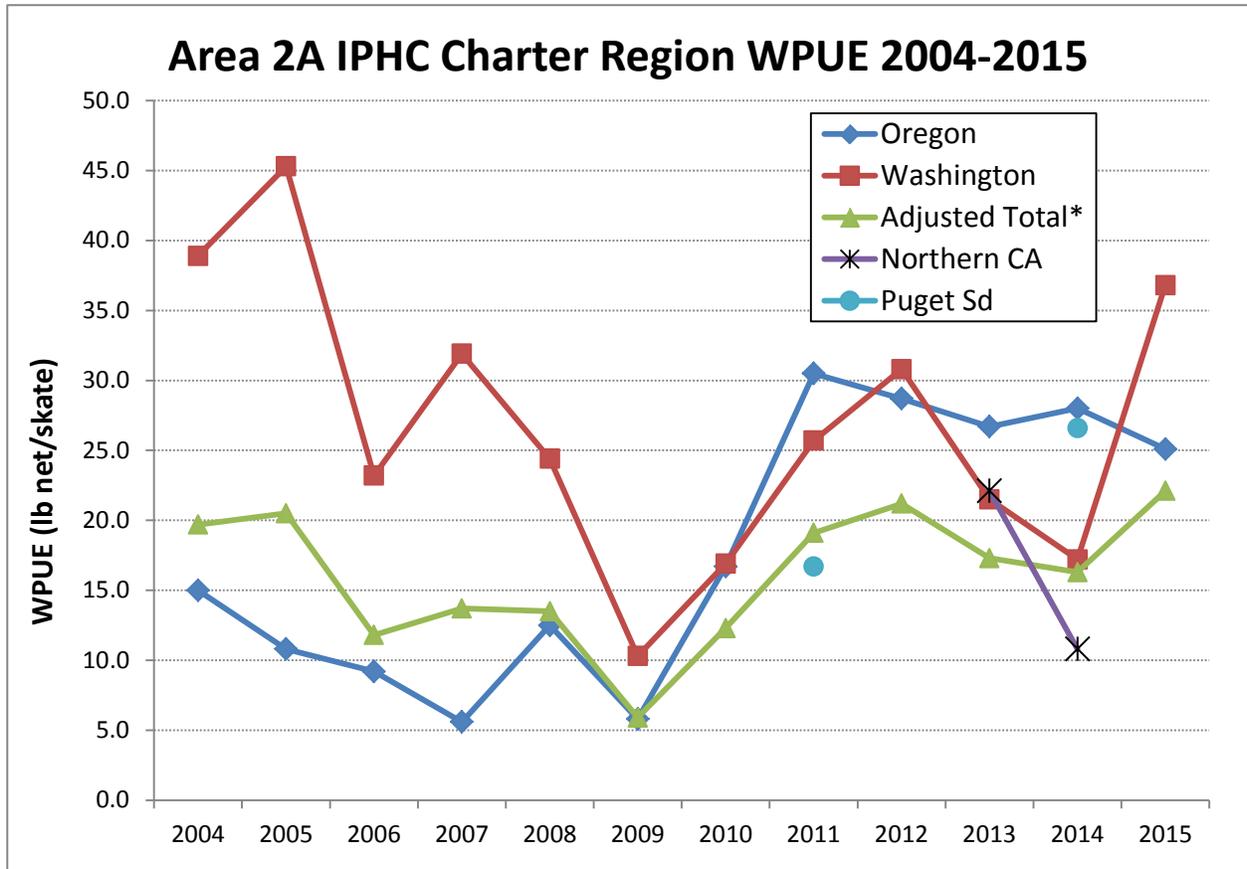


Figure 1. IPHC Area 2A charter region catch rates (WPUE, lbs net/skate) from standardized setline surveys, 2004-2015. Note: IPHC Charter Regions do not match some State boundaries precisely.

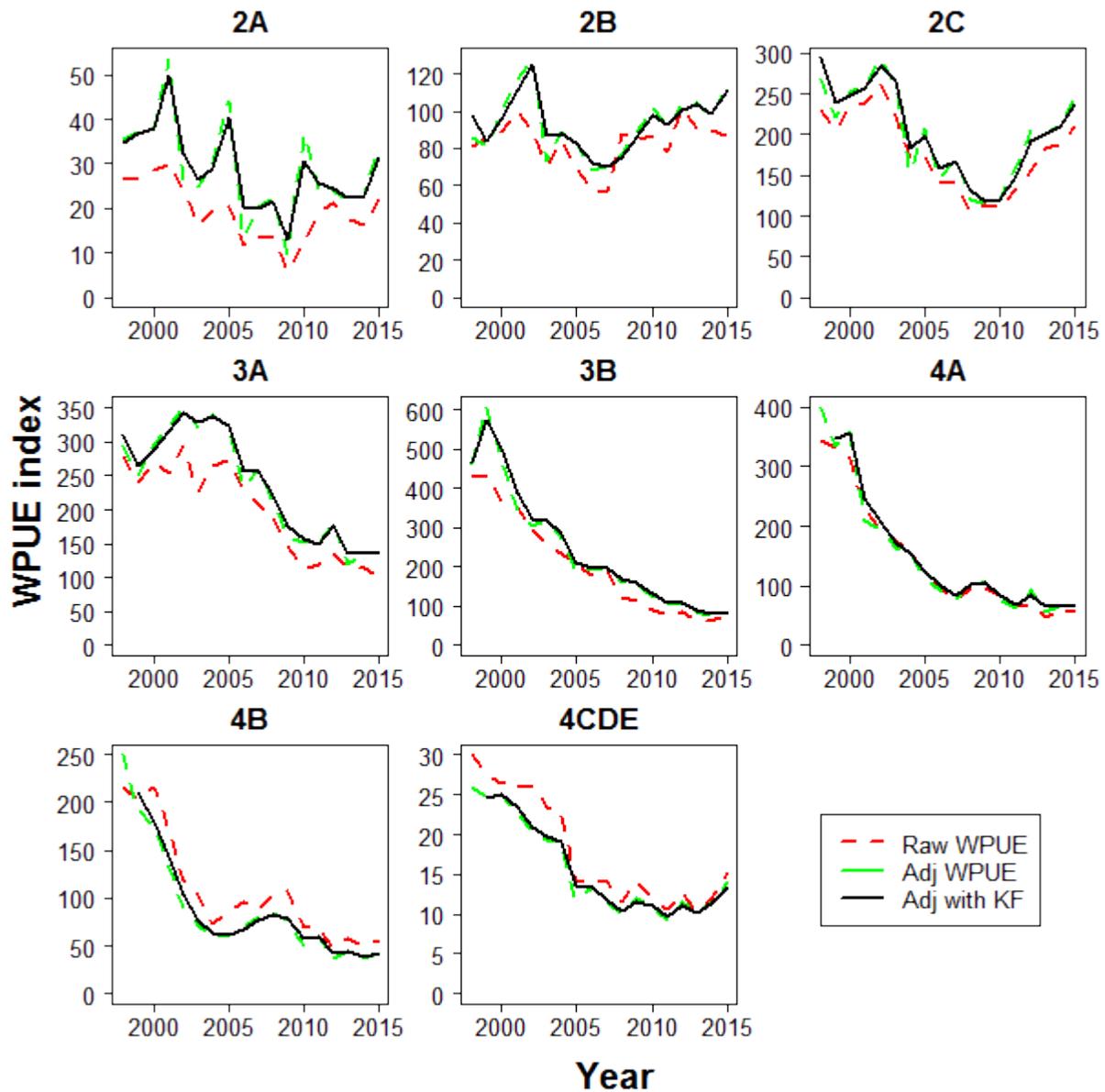


Figure 2. Comparison of survey halibut WPUE without adjustments (Raw WPUE), with both timing and hook competition adjustments applied (Adj WPUE), and with adjustments and a 75:20:5 weighting of the three most recent years' values (Adj with Kalman Filter) (from Webster and Stewart 2016).