



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

March 6, 2018

Mr. Barry Thom, Regional Administrator
West Coast Region, NMFS
7600 Sand Point Way N.E.
Seattle, WA 98115-0070

SENT VIA E-MAIL

Dear Mr. Thom:

On February 6, 2018, the Washington Department of Fish and Wildlife (WDFW) submitted comments to the National Marine Fisheries Service (NMFS) on the proposed rule (NOAA-NMFS-2017-0157) regarding the Pacific Halibut Catch Sharing Plan (CSP) and regulations for the International Pacific Halibut Commission's (IPHC's) regulatory Area 2A. Our letter included a request to add a management measure to the CSP and NMFS regulations, which still stands, and a comment on the Area 2A Total Constant Exploitation Yield (TCEY), which we would like to qualify based on additional information.

While WDFW indicated its support for the roles and responsibilities of IPHC Commissioners and the IPHC process, we also believe that this year's halibut management process was unique in many ways and may warrant an exception to that general statement. Not only did the Commissioners fail to reach agreement on the catch limits, the annual survey in 2A coincided with an anomalous hypoxic event and occurred considerably later in the year; as such, it is difficult to say to what degree that affected the survey results.

Since we submitted our comment letter, we have heard from our tribal co-managers that they do not believe that the "conservation necessity standard" has been met to justify a proposed reduction in the 2A catch limit. While it is unclear to us whether this standard has been met, we would note that several catch limits were modeled for Area 2A, including the 2017 Fishery CEY of 1.33 million pounds and, through this modeling exercise, varying the 2A catch levels did not seem to have any detectable difference in the overall status of the stock.

Given the uniqueness of this year's halibut management process and the question that the tribes have raised about the conservation necessity standard, WDFW would like to indicate our support for the tribes' position and for the Area 2A Fishery CEY of 1.33 million pounds for 2018. We would also encourage IPHC to repeat the expanded survey in 2A so we can have a better understanding of the halibut biomass in 2A to support an appropriate catch limit for 2019.

If you have any questions, please contact me at (360) 902-2182 or Michele.Culver@dfw.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Michele K. Culver".

Michele K. Culver
Intergovernmental Ocean Policy Manager