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Philip Anderson, Chair | Charles A. Tracy, Executive Director

November 16, 2018

Dr. David Wilson, Executive Director  
International Pacific Halibut Commission  
2320 West Commodore Way, STE 300  
Seattle, WA 98199

Dear Dr. Wilson,

The Pacific Fishery Management Council (Council) appreciates the International Pacific Halibut Commission's (IPHC) presentations provided by Mr. Steve Keith at our September and November 2018 meetings regarding the proposal to extend the length of the fishing period for the non-treaty directed commercial Pacific halibut fishery in IPHC Regulatory Area 2A. The Council understands that the IPHC will review this proposal at its 2018 Interim Meeting and the 2019 Annual Meeting.

We understand the IPHC's desire to adjust the structure of the directed commercial fishery. However, we would like to take this opportunity to provide feedback on a number of unresolved or outstanding issues that we identified in reviewing the IPHC's proposal and analyses. Because these issues are critical to coordinating with our state and Federal management partners on halibut management, we request the IPHC engage with us to work through all of the issues, or otherwise delay action to modify the management parameters of the 2A directed commercial halibut fishery until the following issues have been addressed.

1. Ensure the proposed changes do not result in additional bycatch, particularly of yelloweye rockfish which is an overfished stock managed under a rebuilding plan. Even though progress has been made in rebuilding yelloweye rockfish, and higher annual catch limits will be in place in 2019 and 2020, there are still significant restrictions in place for both recreational and commercial fisheries. Modifications to the management parameters of the directed commercial halibut fishery that potentially increase yelloweye rockfish mortalities is of concern. Timely and accurate tracking of yelloweye rockfish impacts, and bycatch of other species (e.g., big skate, longnose skate, sablefish, and rougheyeye/blackspotted rockfish), need to be accounted for and monitored as an important component of managing the fishery.
2. Ensure advance coordination with the National Marine Fishery Service (NMFS) West Coast Groundfish Observer Program such that the Council's data collection and bycatch estimation efforts are not compromised by the proposed change in fishery length, as well

as with the state agency port sampling programs to ensure adequate collection of biological samples.

3. Consider the effect of the proposed change on the economic viability of the fishery to both the harvesters as well as the buyers and processors, especially the implications associated with smaller volumes of deliveries. In particular, the Council has heard from some participants that the current directed commercial fishery may not be economically viable now, and it will be important to understand how the proposed changes may affect the fishery from an economic perspective.
4. Ensure advance opportunity for discussion and coordination with enforcement entities, including the NMFS Office of Law Enforcement, U.S. Coast Guard, and the state departments of fish and wildlife and law enforcement entities, relative to their collective efforts to effectively enforce the fishery regulations during a longer season. As part of those coordination efforts, discuss whether fish hold inspections should continue to be required and who would perform those inspections.
5. Consider what the appropriate timing of the fishery should be (e.g., noon to noon, or midnight to midnight), the effects of different options, and whether a 72-hour stand down period prior to the opening is still needed.
6. In setting the season dates for this proposal, consider the potential impacts to the Area 2A recreational fisheries, which are currently scheduled around the directed commercial fishery openings to avoid gear conflicts, as well as the economic effects associated with different season options. Specifically, the Council would appreciate an opportunity to review and discuss an analysis of the impacts to the recreational fisheries that may result from the proposed season date options for the directed commercial fishery.

Although the implementation issues outlined above relate to the IPHC's proposal to extend the length of the fishing period for the directed commercial fishery, they are issues that the Council and its management partners will need to resolve prior to providing a perspective on any change in the management structure of the 2A directed commercial halibut fishery.

In addition, past correspondence (May 15, 2018 letter to the Council) indicates that IPHC considers the proposed fishing period extension is an interim step towards larger changes to the Area 2A management approach. To consider future changes to the Area 2A halibut fishery management structure in a more holistic way, the Council and NMFS West Coast Region office proposed a workshop, potentially as early as spring 2019, to fully engage all management partners in this exploration. We believe this approach will assist us in answering some of the questions outlined above prior to moving forward with changes to the management of this fishery.

The Council looks forward to engaging with the IPHC in this process as a way to address management issues and collaborate with all management partners on potential solutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Philip Anderson  
Council Chair

RDE:kma

Cc: Mr. Chuck Tracy  
Mr. Mike Burner  
Ms. Robin Ehlke  
Mr. Frank Lockhart  
Ms. Keeley Kent  
Ms. Aja Szumylo  
Ms. Kathryn Blair  
Ms. Michele Culver  
Mr. Joe Oatman  
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