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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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March 1, 2011

Mr. Mark Cedergreen
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: March 2011 Meeting, Agenda Item F.3: ODFW Report

Dear Mark,

The staff of the International Pacific Halibut Commission has reviewed the ODFW Report for Initial Consideration of Proposed Changes to Pacific Halibut Allocation for Bycatch and Catch Sharing in the Groundfish Fisheries.

Allocation of removals within the overall IPHC catch limit for Area 2A is clearly the purview of the Council and the Commission has no wish to interfere with that process. However, we would like to make you aware of the potential impacts on Commission activities of some of the options in the proposed changes. If an option to eliminate or largely reduce the directed commercial halibut fishery is supported, it will seriously impact the contribution of Area 2A commercial fishery data to the Commission's coastwide stock assessment data set. Currently, commercial weight per unit effort (WPUE) is derived from logbook data collected throughout Washington and Oregon, from the directed treaty and nontreaty commercial fisheries. If commercial WPUE data for a directed fishery in the southern area were not available we would have an incomplete picture of the commercial WPUE for the coastwide assessment. The issue is that data from bycatch-only fisheries such as the sablefish fishery are not useful as a stock index. In addition, biological sampling from the incidental fishery may not be representative of the bulk of the exploitable biomass if the fish are obtained from areas or depths that are primarily sablefish habitat. Finally, we would also need to revise our port sampling program to obtain biological data from sporadic, coastwide landings in an incidental fishery. The costs of that revised program are not currently clear and we would need to understand the temporal distribution of sablefish landings to estimate those costs.

We also note that data provided in the ODFW Report is for only the Oregon portion of the directed nontreaty commercial fishery and additional vessels that fish and landings in southern Washington would be affected. We did clarify with ODFW that Table 3.1 provides the number of landings and not the number of vessels that participated in the Oregon directed halibut fishery. If this proposal moves forward, we can work with Council or agency staff to provide halibut fishery data or verify any of the data in future reports.

Retention of halibut within the sablefish fishery could only be allowed within the commercial halibut fishing season, which is set by IPHC and has generally occurred from March to November in recent years. The Council and NMFS could adopt more restrictive commercial fishing dates within that time frame, if desired.

As we have previously recommended, any consideration for allowing retention of incidental halibut within the groundfish fisheries should be handled solely within the Council's Halibut Catch Sharing Plan, where all other retained harvests are managed.

IPHC staff will be attending the March meeting and can address any questions the Council may have about our comments. In addition, I will be attending your meeting on Saturday March 5th and would be pleased to present a report on the Commission's Annual Meeting and issues of relevance to Area 2A.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce". The signature is stylized with a large, sweeping initial letter.

Bruce M. Leaman
Executive Director

cc: Commissioners