



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, MD 20910
THE DIRECTOR

JAN 20 2015

Dr. Bruce M. Leaman
Executive Director
International Pacific Halibut Commission
2320 West Commodore Way, Suite 300
Seattle, Washington 98199-1287

Dear Dr. Leaman:

I am writing to recommend that the International Pacific Halibut Commission (IPHC) provide adequate harvest opportunities for the IPHC Area 4CDE (Bering Sea) directed halibut fishery in 2015. A limited increase in the Area 4CDE catch limits in 2015 relative to the current IPHC harvest policy would not be expected to have an adverse impact on the health of the halibut resource. I believe that the IPHC's practice of considering, and accommodating, socioeconomic impacts in its catch limit recommendations is particularly relevant for Area 4CDE this year. My recommendation is based on the potentially serious socioeconomic impacts of a low catch limit in Area 4CDE and the extensive new efforts being undertaken by the North Pacific groundfish fleet to further minimize bycatch in Area 4CDE during 2015. Lower bycatch would provide additional harvest opportunities for the directed fishery. These efforts should be considered in the IPHC's Area 4CDE catch limit recommendation.

My support for adequate catch limits in Area 4CDE is based on several factors. First, the IPHC has not indicated that the halibut stock is at a level that would correspond to being overfished or subject to overfishing. Although the halibut stock has decreased substantially relative to historic highs, the overall abundance of halibut is consistent with the long-term historic average. We have no indication from the IPHC or other sources that the halibut stock is in a state of sustained decline. Most recent IPHC projections estimate stable or slightly increasing halibut biomass in the near term. A limited increase in the catch limit for Area 4CDE would not be expected to pose a conservation risk to the halibut resource.

Second, the potential reductions in the Area 4CDE catch limit will have substantial negative impacts, primarily on remote coastal communities within Area 4CDE. Recent IPHC updates to Area 4CDE catch tables indicate that the 2015 Area 4CDE directed halibut fishery catch limit could be reduced to 520,000 pounds, which would be a 60% reduction from the 2014 catch limit. Numerous participants in the Area 4CDE fishery have expressed deep concern about this potential reduction. The halibut fishery is an essential socioeconomic resource for the residents, communities, and fishing businesses throughout the North Pacific, and in Area 4CDE in particular.

THE ASSISTANT ADMINISTRATOR
FOR FISHERIES



Third, the North Pacific groundfish fleet is undertaking significant efforts to reduce bycatch in Area 4CDE during 2015. NMFS and the IPHC have received updates from the North Pacific groundfish fleet that demonstrate a keen awareness of the need to reduce bycatch. The North Pacific groundfish trawl fleet has applied for an exempted fishing permit (EFP) that would allow authorized personnel under specific protocols to sort halibut on the decks of trawl vessels and return those halibut to the sea more rapidly. A similar experiment conducted in 2012 reduced halibut mortality by 32 percent. We anticipate similar reductions in halibut mortality under this EFP, but with greater participation from the trawl fleet than in 2012. This EFP application is available at <http://www.alaskafisheries.noaa.gov/>, and will be reviewed by the Council at its February 2015, meeting. Fishing under this EFP could begin shortly after the Council's February meeting concludes. The groundfish trawl fleet has been working internally, and with IPHC staff, to develop other measures that can further reduce bycatch of larger halibut (halibut over 26" in length) that contribute to the directed halibut fishery in Area 4CDE. Some of the tools that will be used include gear that can exclude larger halibut, enhanced communication within the fleet about the rate and the size composition of bycatch in Area 4CDE, and contractual provisions that require vessels to move from areas with higher halibut bycatch.

Finally, NMFS and the Council are committed to reducing halibut bycatch in the Bering Sea/Aleutian Islands (BSAI) and the Gulf of Alaska in the near future. As you know, the Council is scheduled to take final action in June 2015 to recommend measures to reduce halibut bycatch limits in the BSAI. NMFS strongly supports the Council's efforts. Any measures that the Council recommends in June 2015 could be implemented by NMFS during 2016. NMFS is also committed to developing measures that reduce halibut bycatch if the Council fails to develop and submit a fishery management plan amendment in a reasonable period of time under the authority of section 304(c) of the Magnuson-Stevens Act, 16 U.S.C. 1854(c). I believe that this approach will be unlikely given the Council's demonstrated commitment to reducing halibut bycatch.

Given the importance of the halibut fishery to participants and communities in Area 4CDE, the ongoing efforts to minimize halibut bycatch in 2015, and the anticipated action by the Council to reduce halibut bycatch limits, I urge the IPHC to consider recommending catch limits that provide adequate harvest opportunity for the directed fishery in Area 4CDE. I believe that additional harvest opportunities can be provided without adversely affecting the health of the halibut resource.

If you have any further questions, please contact Glenn Merrill, Assistant Regional Administrator for Sustainable Fisheries, Alaska Region, at (907) 586-7228.

Sincerely,



Eileen Sobeck
Assistant Administrator for Fisheries

cc: IPHC Commissioners/NPFMC