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INTERNATIONAL PACIFIC HALIBUT COMMISSION

C6, C7 Public Comment
April 2015
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March 30, 2015

Mr. Dan Hull, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Re: April 2015 meeting, agenda items *C6 GOA Sablefish Longline Pots* and *C7 Retain 4A Halibut in Sablefish Pots*

Dear Dan,

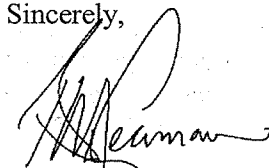
The staff of the International Pacific Halibut Commission (IPHC) has reviewed both of the agenda items pertaining to retention of halibut in sablefish pot gear.

With regard to agenda item C6, the IPHC has not considered the concept of sablefish pot gear as a legal fishing gear for halibut in the Gulf of Alaska (GOA), or the development of a new directed halibut fishery using pot gear. The previous discussion on the use of pot gear during sablefish fishing in the Bering Sea and Aleutian Islands (BSAI) included limiting halibut retention to an incidental fishery only. Authority for the definition of legal gear for halibut retention rests with the Commission; however, the Council could submit a request to allow pot gear as a legal halibut fishing gear for review by the Commission and its advisory bodies at the IPHC Annual Meeting in January 2016. The Commission may approve unrestricted retention, retention with some restrictions, or not approve retention. It would be of assistance to the Commission to have a Council representative present to address any such request. Alternatives under agenda item C6 include gear retrieval requirements and gear specifications and, in the Area 4A discussion, the Commission supported appropriate methods for the timing of gear removal from the fishing grounds and the marking of buoys (or flagpoles).

On agenda item C7, the IPHC supported retention of Area 4A halibut caught incidentally in the sablefish pot fishery in the areas of overlap in the NMFS BSAI regulatory area, if the harvester has both halibut and sablefish Individual Fishing Quota. The Commission staff believes the maximum retainable amount (MRA) or weight ratio as presented in the Discussion Paper meets the IPHC objectives of an incidental fishery. A fleet-wide average prohibited species catch rate based on observations during normal sablefish fishing, with a buffer to minimize discards, seems an appropriate method to determine such an incidental rate. The Commission staff would also support an exempted fishing permit (EFP) that could be reviewed by IPHC and allow for the collection of halibut data, under which the fishery could operate while regulations were developed.

I will be attending the April Council meeting and will be available to answer questions.

Sincerely,



Bruce M. Leaman, Ph.D.
Executive Director