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INTERNATIONAL PACIFIC HALIBUT COMMISSION

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

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February 25, 2016

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

Dear Mr. Hull:

Thank you for forwarding the Council's updated Halibut Management Framework to the Commission. As we noted in December, the Commission welcomes this articulation of Council views on the halibut resource and the component of halibut management under the Council purview. The Commission also appreciates that the document has evolved as the Council has received input from the public and some of its advisory bodies. The Commission also appreciates the opportunity afforded by your briefing to the Commission at its 2016 Annual Meeting in Juneau.

Following on our initial letter to you in December 2015, we continue to welcome the opportunity for continued dialogue with the Council about the draft. In particular, we would like to recognize several elements of the framework about which we believe that further discussion would be useful.

1. *Balancing the objectives of groundfish and halibut management.* As noted in the framework, the Council and the Commission each have unique statute-based authorities and responsibilities. Neither statute provides guidance on how to balance the objectives of groundfish and halibut management. Further, because of the transboundary nature of the halibut resource, the Commission's responsibility extends beyond that of a single nation and needs to encompass the objectives of both countries in halibut management. Within its management framework, the Commission therefore sees a potential need to seek the guidance of the contracting parties in harmonizing the objectives of the two nations. The current Commission management framework allows priority access of halibut yield to the bycatch, Alaskan unguided sport, and personal use fisheries. This priority access is, in effect, an allocation decision and these ungoverned removals can potentially exceed the Commission management targets for all removals. This is a fundamentally different framework than, for example, that for salmon management between the two countries. In the latter, salmon escapement goals are the ultimate management metric and all other removals are subservient to these goals.

Such a management framework does not exist for halibut and the Commission believes that resolution of this dichotomy requires the government-to-government discussion afforded by the Commission framework. The broader jurisdictional authority of the Commission provides the appropriate vehicle to accommodate the transboundary spatial distribution and dynamics of the halibut resource. However, additional discussions between the Council and the Commission may help to facilitate these higher-level interactions.

2. *Research priorities.* The framework outlines a number of research issues for consideration and the Commission welcomes the Council views on perceived gaps in understanding or areas of uncertainty. The Commission's research priorities mirror some of the elements identified by the Council but we also note some areas of divergence. In particular, we note that the list of research priorities contains a mixture of research and management items and we believe that these elements should be separated. For example, a management priorities heading might include the Council's thoughts on integrated decision-making framework and development of abundance-based management items. However, such a section should also reflect consideration of monitoring requirements necessary to support management, development of effective bycatch reduction tools, and other items that are consistent with the spirit of recent NOAA announcements related to bycatch. This list of management priorities would presumably reflect the bycatch strategy and local action plans NOAA plans to release over the coming month. The Commission would be most interested in a discussion with the Council about how their work meshes with national initiatives as they unfold.

The Commission recognizes that age- or size-specific natural mortality rates are influential in yield calculations. This is a universal conclusion for stock assessments of any species. We also recognize both the lack of data to inform the choice of mortality parameters for the younger ages and the low probability of obtaining more definitive data on halibut or any other species through new research activities. Accordingly, the Commission would not currently prioritize research on this topic and we note that the Council's SSC reached a similar conclusion in its priority-specific comments to the Council at the February meeting.

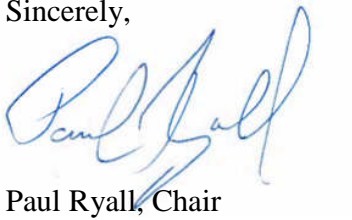
Migration probabilities and rates for the sizes of fish subject to bycatch are an important source of uncertainty in assigning the effect of bycatch mortality in one area to the ultimate impact on yield in other areas. This is a research topic on which the Commission welcomes suggestions for alternative approaches to identifying migration values for smaller (< 50 cm) halibut. The Commission currently accommodates the impact of movement of fish vulnerable to our survey gear via its coastwide assessment and apportionment of exploitable biomass to IPHC Regulatory Areas. Knowledge of movement by these smaller fish is also an important component of interpreting the effects of abundance-based PSC management by the Council, since removals relative to a metric of local abundance in any area cannot be a proxy for the impact of removals on the halibut stock and its dynamics because of the movement of these smaller fish among regulatory areas.

3. *Communications between the Commission and the Council.* The draft suggests means to formalize communication with the Commission and we recognize the merit of these approaches. We support the continuing work by staffs of our two bodies plus other agency staffs on joint working groups addressing abundance-based PSC management and review of the basis and application of halibut discard mortality rates. We also support the concept of a smaller protocol committee between our two bodies, in conjunction with regular joint meetings of the Commission and the Council. The smaller committee would provide a

practical vehicle to develop concepts and background information for discussion by the joint meeting. We believe the importance of the issues requires understanding and action at the policy level, which would require the full parent bodies.

As a means to move forward, we suggest that the Chairs of our two bodies meet to finalize a framework for the joint protocol committee and an agenda for its first meeting, to be forwarded to the Commission and the Council for their approval. Please let me know if this proposal is acceptable and we can schedule such a meeting.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Ryall", is positioned above the typed name.

Paul Ryall, Chair
International Pacific Halibut Commission

cc: IPHC Commissioners

Dr. Leaman, Executive Director IPHC

Mr. Oliver, Executive Director, NPFMC