



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

James W. Balsiger, Ph.D., Chair
Mr. Paul Ryall, Vice-Chair
International Pacific Halibut Commission
2320 W. Commodore Way, Suite 300
Seattle, WA 98199-1287

JUN 26 2015

Dear Dr. Balsiger and Mr. Ryall:

Thank you for your letter regarding the North Pacific Fishery Management Council's action to reduce Pacific halibut bycatch limits for the Bering Sea and Aleutian Islands (BSAI) groundfish fisheries.

At its meeting that concluded on June 9, 2015, the Council recommended new halibut bycatch limits that will reduce halibut bycatch limits in the Bering Sea and Aleutian Islands (over 21 percent lower than current levels). However, it is important to note that the Council's recommendation revised specific bycatch limits that apply to the four fishery sectors operating in the BSAI: the Amendment 80 sector (non-pollock trawl catcher/processors), the BSAI trawl limited access sector (all non-Amendment 80 trawl participants), the non-trawl sector (primarily hook-and-line catcher/processors), and the Community Development Quota (CDQ) sector.

The Council's recommendation would establish bycatch reductions in the groundfish sector that takes the most halibut bycatch. The Council recommended a reduction in the halibut bycatch limit for the Amendment 80 sector from 2,325 metric tons (mt) (5.13 million pounds) to 1,745 mt (3.85 million pounds). In 2014, total halibut bycatch in the Amendment 80 sector was 2,106 mt (4.64 million pounds). Therefore, the new limit recommended by the Council is expected to reduce halibut bycatch in the Amendment 80 sector alone by approximately 361 mt or 800,000 pounds (a 17% reduction) relative to the amount of bycatch that occurred in 2014. Since this estimated halibut bycatch saving assumes that the Amendment 80 sector will fully use its bycatch limit, and since this is unlikely due to regulatory and operational limits, the bycatch reduction is likely to be higher for this sector.

The Council also recommended a halibut bycatch limit of 735 mt (1.62 million pounds) in the BSAI trawl limited access sector. In 2014, total halibut use in the BSAI trawl limited access sector was 717 mt (1.58 million pounds). Therefore, the new limit recommended by the Council would be expected, at a minimum, to maintain halibut bycatch use in the BSAI trawl limited access sector at its current level of use and not to increase the amount of bycatch that this sector could use.

The Council also recommended a halibut bycatch limit of 710 mt (1.57 million pounds) for the non-trawl sector. Historically, the non-trawl sector has used an amount of halibut bycatch that is well below its bycatch limit. Halibut bycatch use in the non-trawl sector has been consistently decreasing in recent years after recent legislation allowed for the formation of a fishery cooperative among hook-and-line catcher/processors. This fishery cooperative has instituted a



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range of fishery management measures to improve communication and handling practices within the fleet, which has further reduced halibut bycatch. For example, in 2014, total halibut use in the non-trawl sector was 419 mt (924,000 pounds), the lowest recorded amount of halibut bycatch by this sector. We anticipate the cooperative will continue these efforts and use an amount of halibut bycatch well below the new limit recommended by the Council.

Finally, the Council recommended a halibut bycatch limit of 315 mt (694,000 pounds) for the CDQ sector. The CDQ sector has consistently used an amount of halibut bycatch that is well below its bycatch limit, and we have no information to indicate that this trend is likely to change in the foreseeable future. For example, in 2014 total halibut use in the non-trawl sector was 244 mt (538,000 pounds).

Overall, the Council's recommendation is expected to result in a net decrease of approximately 361 mt (800,000 pounds) in halibut bycatch relative to current levels of halibut bycatch use. Compared to total halibut bycatch in 2014 of 3,480 metric tons, a decrease of 361 metric tons represents approximately a 10 percent decrease in total halibut bycatch relative to current use.

In making its recommendation, the Council balanced the potential impacts of halibut bycatch limit reductions on the halibut resource, participants in the directed halibut fishery, participants in the groundfish fisheries, and communities that rely on halibut and groundfish resources. Specifically, the Council considered all of the National Standards for fishery conservation and management specified in the Magnuson-Stevens Fishery Conservation and Management Act when making its recommendation. The Council's recommendation will be carefully considered by NOAA's National Marine Fisheries Service (NMFS). If approved, NMFS would implement the reductions in 2016.

In addition to the action taken by the Council at its June meeting, NMFS is working on other measures to reduce halibut bycatch. In 2015, NMFS approved an experimental fishing permit in the Bering Sea trawl fisheries to test the feasibility of sorting halibut on deck (deck sorting) and returning those halibut to the sea as a measure to reduce the mortality of halibut bycatch. NMFS will be reviewing the results of those efforts and will coordinate with the Council and industry on possible changes to regulations to allow deck sorting if these experiments prove successful. NMFS has also supported efforts to improve the use of gear modifications that can exclude halibut from fishing gear, and has actively encouraged the expanded use of these innovative gear designs.

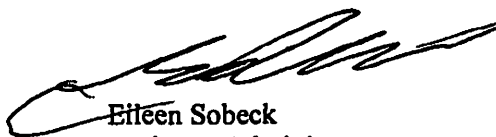
As you know, the Council is taking other steps to address halibut bycatch. The Council is scheduled to review a discussion paper in October 2015 that explores ways to index BSAI halibut bycatch limits to a metric of halibut biomass. At its June 2015 meeting, the Council tasked the Council Chair and the Executive Director to evaluate ways to integrate the variety of halibut management and research activities underway by the Council and the IPHC, to develop a framework for improving coordination between the two bodies, and to come back with recommendations for next steps at its October 2015 meeting. The Council also requested that the Amendment 80 sector provide halibut bycatch management plans for 2016 at its December 2015 meeting. In addition, the Council is assessing regulatory changes to increase halibut harvest opportunities for Bering Sea community residents. At its June 2015 meeting, the Council

initiated a discussion paper to examine allowing CDQ groups to lease halibut individual fishing quota from quota share holders and provide that individual fishing quota to residents of coastal communities in Areas 4B and 4CDE in years with a low directed halibut harvest.

I appreciate that halibut is an important resource for commercial, recreational, and subsistence users throughout the North Pacific. We will continue to work with the Council to implement halibut conservation and management measures that effectively balance the needs of all user groups in Alaska. NMFS is committed to working with the IPHC to ensure effective coordination between the Council and the IPHC as the Council continues to develop and refine management measures that can further minimize halibut bycatch.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Eileen Sobeck", written over a horizontal line.

Eileen Sobeck
Assistant Administrator
for Fisheries