FISHING VESSEL OWNERS' ASSOCIATION INCORPORATED

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December 1, 2014

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

RE: **Proposals for 2015 Fishing Season**

Dear Dr. Leaman:

The members of the Fishing Vessel Owners' Association (FVOA) have reviewed initial reports from the 2013 observer program in the Gulf of Alaska. Those reports indicate that the directed halibut fleet is releasing 8.7 million pounds of undersized halibut, halibut less than 32 inches. New reports suggest that with a 2 inch reduction in size limit, the directed halibut fleet could reduce handling by 58% and a reduction in wastage from 1.35 million pounds to .58 million pounds.

The members of FVOA request the Commission to provide a review at the Annual Meeting for a lower size limit of 30 inches to be possibly implemented for 2015. The FVOA request this discussion be placed before the Conference Board and Processor Advisory Group for their comments at the Annual Meeting.

Sincerely,

Per Odegaard
President

RDA:cb

Enclosures

The following table is based on the output from the ShinyApp (https://iphc.shinyapps.io/MSAB/), where in Procedure B the size limit is reduced from 32 inches to 30 inches. In this procedure the discards in the directed fishery would be reduced from 8.7 million pounds to 3.62 million pounds (or roughly 58% decrease in handling).

Equilibrium values at MSY

	Procedure	Fe	Yield	Discard	Waste	Spawning.Biomass	Avg.Weight
1	A	0.28	36.42	8.70	1.39	116.14	16.25
2	B	0.27	37.87	3.62	0.58	112.40	15.19

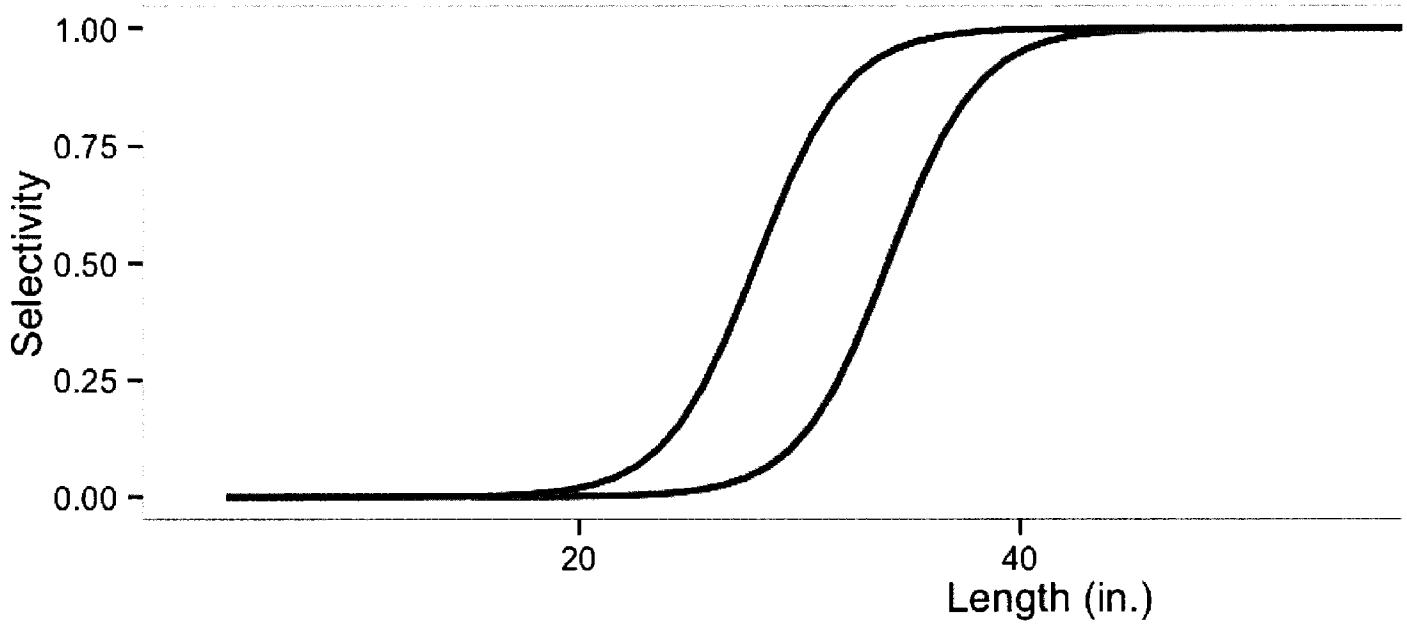
THe following table is the same as above, but with Procedure B having a 28 inch minimum size limit. IN this case discards in the directed fishery would decline to 1.38 million pounds, or and 84% decrease in handling of small fish.

Equilibrium values at MSY

	Procedure	Fe	Yield	Discard	Waste	Spawning.Biomass	Avg.Weight
1	A	0.28	36.42	8.70	1.39	116.14	16.25
2	B	0.27	38.56	1.38	0.22	108.86	14.48

IN both of these scenarios, the yield increases slightly, but the average size of fish in the catch declines (as you would expect). These results also assume that the fisheries selectivity would not change in response to reducing

the minimum size limit. These benefits would completely disappear if the selectivity shifted to smaller fish. For example using the selectivity curves below in B, and the corresponding table below that, with a minimum size limit of 28 inches. In this case, the discards would increase by a few percent.



Equilibrium values at MSY

	Procedure	Fe	Yield	Discard	Waste	Spawning.Biomass	Avg.Weight
1	A	0.28	36.42	8.70	1.39	116.14	16.25
2	B	0.15	39.83	8.94	1.43	113.92	12.08

Table 2. Estimates of halibut discards (net weight) in pounds by sector. Data taken from the 2013 Observer Annual Report and multiplied by 0.75.

		Hook & Line	Non-pelagic Trawl	Pot	Pelagic Trawl	TOTAL
GOA						
Catcher Processor	obs	509,267	904,445	-	-	1,413,713
	tot	510,921	904,445	-	-	1,415,366
Catcher Vessel	obs	1,233,485	307,544	1,653	31,416	1,574,099
	tot	19,201,689	2,119,742	147,158	49,604	21,518,194
BSAI						

Catcher Processor	obs	9,287,513	5,019,920	16,535	358,802	14,682,769
	tot	9,431,364	5,019,920	16,535	358,802	14,826,621
Catcher Vessel	obs	128,970	525,802	1,653	42,990	699,416
	tot	848,228	687,841	28,109	44,644	1,608,821
Grand Total Observed		**11,159,235**	**6,757,711**	**19,842**	**433,208**	**18,369,996**
Grand Total Extrapolated		**29,992,202**	**8,731,949**	**191,802**	**453,049**	**39,369,002**