December 7, 2015

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

Dear Mr. Hull:

Thank you for having the draft Halibut Management Framework forwarded to the Commission. Although we did not have sufficient time for a thorough review and discussion of the draft at our Interim Meeting last week, we do appreciate the opportunity to provide comments on it. The Commission welcomes this articulation of Council views on the halibut resource and its management, recognizing that it is an evolving document. We appreciate the considerable thought and effort put into its production. The draft presents a number of suggestions concerning the Council and Commission, some of which we believe could form the basis for improved communication and the development of new approaches to dealing with our mutual concerns about halibut management. We welcome an opportunity for continued dialogue with the Council about the draft and offer several preliminary thoughts for further consideration.

1. The document describes the Council’s desire to harmonize its objectives for halibut management with those of the harvesting sectors. While there is a detailed listing of the objectives identified in the FMPs for the BSAI and the GOA, the draft notes that these are extremely broad and perhaps not that useful in the context of this framework. Additionally, it does not articulate how potential Council objectives might interface with those of the harvesters. To this end, the Commission sees significant value in continued dialogue with the Council to develop a better understanding of Council objectives concerning halibut and notes several suggested measures in the document that may provide such opportunities.

2. We recognize that the document is designed primarily to guide Council approaches to halibut issues. However, it would be helpful to understand the time frame for its further development and in particular when the Council contemplates further interaction with the Commission.

3. The draft suggests some means to formalize communication with the Commission and we recognize the merit of these approaches. In particular, the establishment of a permanent section in the Council’s meeting agenda for a Commission report would provide an excellent opportunity to keep the Council apprised of IPHC issues and initiatives, as well as to highlight items of emerging concern.

4. We believe there is good ongoing communication between the staffs of the Council and the Commission. As you note, we have historically relied on key individuals to coordinate that
communication and neither body has fully replaced that function following the departure of those individuals. We agree that both bodies should designate a key individual to re-establish that coordinated communication on halibut issues. Clearly, multiple individuals from the staffs will be involved in the diversity of halibut issues but these key individuals would serve our communication well.

5. The draft identifies a joint Council-Commission committee and while we have not had opportunity to discuss such a committee in detail, we agree that such a committee must be composed primarily of Commissioners and Council members, in order to efficiently explore and develop policies to guide our future interactions.

The Commission will spend additional time in reviewing this draft prior to and at our Annual Meeting in January 2016. We would welcome your attendance at that meeting to have further discussion on this draft and the commentary on it arising from your December meeting.

Sincerely,

James W. Balsiger, Chair
International Pacific Halibut Commission

cc: IPHC Commissioners
   Dr. Leaman, Executive Director IPHC
   Mr. Oliver, Executive Director, NPFMC