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INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

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May 7, 2012

Dr. James Balsiger, Regional Administrator
National Marine Fisheries Service, Alaska Region
P.O. Box 21668
Juneau, AK 99802

Dear Dr. Balsiger:

At its 2012 Annual Meeting, the Commission received a report on the Alaska subsistence fishery and monitoring program conducted by Dr. Jim Fall of AD&FG, under contract to NMFS. Since its inception, the program has provided the IPHC with timely and informative data on subsistence removals, which are vital to our stock assessment and management process. While the magnitude of the subsistence removals may not appear to be as significant as commercial or sport removals, their impact is very important on a localized basis. For example, in southeast Alaska the subsistence harvest is roughly 0.5 million pounds and may contribute to issues of local depletion around some population centers.

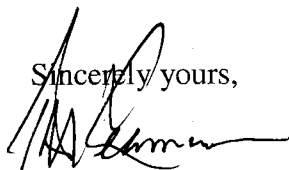
The Commission staff stresses the need for and importance of continued monitoring of subsistence removals. As we have stated in our previous correspondence on this subject, the increasing restrictions on the sport and commercial fisheries can be expected to have attendant impacts on other fisheries for halibut, as residents look for other means of obtaining halibut. In addition, the status of the halibut resource across Alaska and especially in Area 2C gives us cause for concern, and further underscores the need to accurate estimates of all removals.

We also note that SHARC renewals have been declining in recent years, and suggest that additional outreach is needed to ensure proper registration. It is the SHARC registrations which form the basis of the mail survey population, so having adequate enrollment is vitally important for a reliable harvest estimate. Tribal and nontribal communities should both be targeted to enhance survey participation.

Lastly, we note concerns about violations of subsistence fishing privileges expressed in correspondence to the Commission and reported by the media. Previous convictions of subsistence harvesters for illegal sale of significant quantities of subsistence-caught fish underscore the need to field effective monitoring and enforcement of subsistence regulations. We support the continuing efforts of agencies involved with subsistence fishery enforcement, and encourage an increase in these activities, given the nature of the violations being reported.

Thank you for consideration of our concerns and recommendation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bruce M. Leaman", written over the typed name below.

Bruce M. Leaman
Executive Director