



## NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

Angel Drobnica, Chair | David Witherell, Executive Director  
1007 W. 3<sup>rd</sup> Avenue, Suite 400, Anchorage, AK 99501  
Phone 907-271-2809 | [www.npfmc.org](http://www.npfmc.org)

April 16, 2025

Dr. David Wilson  
International Pacific Halibut Commission  
2320 West Commodore Way, Suite 300  
Seattle, WA 98199-1287  
*Via Email: [david.wilson@iphc.int](mailto:david.wilson@iphc.int), [secretariat@iphc.int](mailto:secretariat@iphc.int)*

Dear Dr. Wilson,

Thank you for your letter regarding proposal IPHC-2025-AM101-PropC2, which was submitted by a member of the public at the IPHC Annual Meeting (AM101). The proposal expressed concerns regarding the possibility of localized depletion of Pacific halibut around St. Matthew Island and proposed regulatory amendments to the application of commercial fishery limits in IPHC Regulatory Areas 4C and 4D. Specifically, the proposal advocated removal of the provision allowing Pacific halibut IFQ and CDQ quota holders in Area 4C to harvest their quota in Area 4D north of 60°N latitude and east of 174°W longitude.

The Council appreciates the communication and information provided by the IPHC. The original 2005 regulatory amendment that allowed Area 4C QS holders to harvest their IFQ and CDQ in Area 4D, was based in part, on research conducted by the IPHC at that time that indicated localized depletion in Area 4C. This amendment only took effect through multilateral action including a recommendation by the Council, IPHC approval of a regulatory change to the halibut annual management measures, as well as approval by the Secretary of Commerce.

Given the IPHC's role to assess the status of the halibut resource, conducting annual stock assessments, collecting data through the Fishery-Independent Setline Survey (FISS), as well biological information from its research program, the Council requests the IPHC provide an assessment, along with relevant supporting information, as to the validity of concerns regarding localized depletion of Pacific halibut around St. Matthew Island. Council members stated their desire to review the scientific information regarding localized depletion in that area before considering whether any management responses should be developed.

The Council is committed to the sustainable management of the halibut resource and looks forward to working with the IPHC towards that goal.

Sincerely,

A handwritten signature in cursive script, reading "Angel Drobnica".

Angel Drobnica  
Chair, North Pacific Fishery Management Council