



KAWERAK, INC. March 30, 2021

REPRESENTING

Brevig Mission

Sitaisaq

Council

Diomedea

Inhaliq

Elim

Niviarcaurluq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Qawwaraq

Nome Eskimo

Sitnasuak Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Qikiqtaq

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tala

Unalakleet

Unalaqliq

Wales

Kinjigin

White Mountain

Igakuik /

Nutchirviq

From: Melanie Bahnke (President)

Kawerak, Inc.

PO Box 948

Nome, AK 99762

To: Simon Kinneen (Council Chair) and Council Members

Dave Witherel (Executive Director)

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK 99501

(submitted via NPFMC Agenda Comment Portal)

Re: April 2021 NPFMC Agenda Item C2: Halibut ABM

Dear Mr. Kinneen, Mr. Witherell, and Council members,

Kawerak is writing to provide comment on the April 2021 NPFMC Agenda Item C2 with regard to BSAI Halibut Abundance-Based Management (ABM). Kawerak is the Alaska Native non-profit Tribal Consortium for the 20 federally-recognized Tribes of the Bering Strait region.

Management of federal fisheries should promote conservation, ensure the sustainability of fisheries and fishing communities, be underpinned by equity, account for special rights accorded to Alaska Native people, and adhere to the mandates of the National Standards. Additionally, we would note that respect towards the marine environment and everything in it is a fundamental traditional value of the Indigenous people of our region. Bycatch should always be as low as possible, as waste is disrespectful.

Halibut fishing is important to some of our region's communities. We support ABM of halibut bycatch. The current fixed halibut Prohibited Species Catch (PSC) limits are not consistent with the management of other fish and crab species and do not result in an equitable system of management and harvest opportunity for directed halibut users and halibut-dependent communities.

Following from this, of the existing alternatives up for discussion regarding Agenda Item C2, we support Alternative 4, along with Option 3 as an incentive program for bycatch avoidance. Of the existing alternatives and options, we feel that only this meets the important mandates and principles we have noted above.

KAWERAK, INC.

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Advancing the capacity of our people and tribes for the benefit of the region.

Thank you for your consideration of this letter, and please reach out to us with any questions. The staff contact for Kawerak on these issues is Julie Raymond-Yakoubian, Social Science Program Director (Email: juliery@kawerak.org, Phone: 907-443-4273).

Sincerely,

Mary David acting for Melanie Bahnke

KAWERAK, INC.
Melanie Bahnke, President

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