



ALASKA MARINE  
COMMUNITY COALITION

October 1, 2026

Angel Drobnica, Chair  
North Pacific Fishery Management Council  
1007 W. Third Ave, Suite 400  
Anchorage, AK 99501

**Re: Agenda Item E - Staff Tasking - Request for Gulf of Alaska Halibut Bycatch Limits Discussion Paper**

Dear Chair Drobnica and members of the Council:

On behalf of the Alaska Marine Community Coalition (AMCC), thank you for the opportunity to comment on the North Pacific Fishery Management Council's (Council) Agenda Item E – Staff Tasking. AMCC is a fishermen-founded organization working to advance sustainable fisheries, healthy marine ecosystems, and thriving fishing communities across Alaska.

AMCC requests that the Council evaluate halibut bycatch limits in the Gulf of Alaska (GOA) and task staff with developing a discussion paper on abundance-based management of halibut prohibited species catch (PSC) limits in the GOA. A discussion paper would be a first step toward evaluating a potential amendment to the GOA Groundfish Fishery Management Plan (FMP) establishing abundance-based halibut bycatch limits for GOA trawl fisheries, where halibut PSC primarily occurs.<sup>1</sup> The GOA amendment could resemble Amendment 123 to the Bering Sea/Aleutian Islands (BSAI) Groundfish FMP, which instead of using a fixed cap, links Pacific halibut bycatch limits for the Amendment 80 commercial groundfish trawl fleet directly to halibut population abundance.<sup>2</sup>

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<sup>1</sup> Fisheries of the Exclusive Economic Zone Off Alaska; Bering Sea and Aleutian Islands Halibut Abundance-Based Management of Amendment 80 Prohibited Species Catch Limit, 88 Fed. Reg. 82740 (Nov. 24, 2023) (effective Jan. 1, 2024), <https://www.federalregister.gov/documents/2023/11/24/2023-25513/fisheries-of-the-exclusive-economic-zone-off-alaska-bering-sea-and-aleutian-islands-halibut>.

<sup>2</sup> *Id.*

Because every FMP must minimize bycatch to the extent practicable,<sup>3</sup> and because the halibut stock has continued to decline, with the spawning stock biomass currently at historic low levels,<sup>4</sup> AMCC requests that the Council task staff with evaluating abundance-based halibut bycatch limits in the GOA, just as it did with Amendment 123 for the BSAI FMP. Restrictions should go down (or up) based on the measured or forecasted population size of a species each year. A staff analysis would provide the information necessary for the Council to evaluate this abundance-based approach in the GOA and determine appropriate next steps.

Thank you for considering AMCC's comments.

Sincerely,

*Michelle Stratton*

Michelle Stratton  
Executive Director

*Lancee Whetman*

Lancee Whetman  
Fisheries Program Manager

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<sup>3</sup> 16 U.S.C. 1853(a)(11).

<sup>4</sup> I. STEWARD & A. HICKS, ASSESSMENT OF THE PACIFIC HALIBUT (*HIPPOGLOSSUS STENOLEPIS*) STOCK AT THE END OF 2025, INT'L PAC. HALIBUT COMM'N. 2 (Dec. 2025), <https://www.iphc.int/uploads/2025/12/IPHC-2026-SA-01.pdf> ("The results of the 2025 stock assessment indicate that the Pacific halibut stock declined continuously from the late 1990s to around 2012. That trend is estimated to have been largely a result of decreasing size-at-age, as well as reduced recruitment levels compared to those observed during the 1980s. The spawning biomass (SB) is estimated to have increased gradually to 2016, and then decreased to a low of 153 million pounds (~69,500 t) at the beginning of 2024. At the beginning of 2026, the spawning biomass is estimated to be 166 million pounds (75,300 t). . . .").