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North Pacific Fishery Management Council  
1007 West Third, Suite 400  
Anchorage, AK 99501-2252

September 30, 2020

Re: Agenda item C-6, BSAI Halibut Abundance Based Management (ABM)

Dear Chairman Kinneen and Members of the Council:

Afognak Native Corporation is a village Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Afognak represents Shareholders living in Port Lions village and the City of Kodiak, both small, coastal communities within the Kodiak Archipelago, from among nearly 1,200 Shareholders. Afognak has been able to provide strong economic and advocacy support to our Shareholder communities as the 7th largest revenue-producing private corporation in the State of Alaska. Our region encompasses the Kodiak Island area in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Afognak has been working diligently on issues affecting the viability and sustainability of the village communities of the Kodiak Archipelago and access to fisheries is a critical component of this effort.

The Prohibited Species Catch (PSC) cap or "bycatch" system that has been in place for several decades in the Bering Sea was set when halibut abundance was significantly higher and is now too high given the reduction in halibut abundance. This static PSC cap is inequitable given the Amendment 80 fleet is allowed the same amount of bycatch every year while the directed halibut fishermen suffer continued reductions in available quota to catch. Furthermore, the decline in halibut abundance results in a higher proportion of halibut removal as bycatch vs. the directed fishery.

Bering Sea bycatch indirectly affects all Pacific halibut fishermen because maturing Bering Sea halibut not taken as bycatch migrate to the Gulf of Alaska (GOA). Coastal communities are dependent on the halibut resource and it is the Council's responsibility to protect the halibut resource and its cultural, subsistence, recreational and commercial value to Alaska halibut fishermen, processors, communities, visitors and consumers.

**The PSC cap system must be replaced with a management system that sets the PSC cap in accordance with halibut abundance.** A starting point below current use is imperative, or this action has no benefit to the directed fisheries in the BSAI or GOA. Every pound of bycatch reduction directly benefits the directed fisheries in the BSAI and GOA. Unless the Council implements an abundance-based management system, those who depend on halibut for their livelihoods or as a customary subsistence resource will continue to pay the exceedingly high costs of bycatch and bear the full burden of conserving halibut at low levels of abundance as has occurred in recent years.

Therefore, **Afognak Native Corporation requests that the North Pacific Fishery Management Council continue to develop an abundance-based management approach to manage halibut bycatch, which results in meaningful actions to reduce halibut mortality in the Amendment 80 groundfish fleet.**

Sincerely,

Alisha Drabek, PhD  
Executive Vice President