



December 22, 2020

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

Dear Council Members:

Enclosed you will find City of Craig Resolution 20-19, calling for a reduction in halibut bycatch of NPFMC-managed fisheries.

The Craig City Council is very concerned about the quantity of halibut bycatch in Alaska waters. The permitted volume of prohibited species catch remains unacceptably high. The PSC is not tied to an accurate abundance index; the detrimental effect of this is lower permitted catch volumes for hundreds of individual fishing quota fishermen in Area 2C and other statistical areas of Alaska. As you are aware, the annual volume of halibut bycatch by other commercial fishing gear groups rivals the volume of halibut permitted for direct take by IFQ holders in Area 2C. The bycatch is profoundly wasteful.

The City of Craig strongly urges council members to maintain full time observer coverage of trawl vessels in the Bering Sea and Gulf of Alaska to fully document halibut bycatch and work toward elimination of measurable incidence of halibut bycatch by fisheries targeting other species.

Sincerely,

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Jon Bolling
Craig City Administrator

Enclosure

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**CITY OF CRAIG
RESOLUTION 20-19**

A RESOLUTION ADVOCATING FOR A REDUCTION OF HALIBUT BYCATCH

WHEREAS, it has been more than five years since the State of Alaska, through the federal North Pacific Fishery Management Council, agreed to lower Pacific halibut bycatch caps in the face of a diminishing biomass; and,

WHEREAS, despite efforts on both sides for five years, tying the management of halibut bycatch to the halibut abundance is still not a reality; and,

WHEREAS, while the federal council struggles with the abundance-based management issue, Alaska's small boat commercial, charter, sport and subsistence fleets and their coastal communities bear the short and long-term impacts that high halibut bycatch creates; and,

WHEREAS, short-term impacts are felt every year when halibut fishermen in the Bering Sea lose a part of their annual allocation that is tied, not strictly to abundance, but to the forecasted landings of bycatch; and,

WHEREAS, long-term impacts are felt by halibut fishermen beyond the Bering Sea, as all sizes (including sub-legal-sized halibut) are removed from the entire biomass forever; and,

WHEREAS, managing the prohibited species bycatch of halibut without tying it to an accurate abundance index of the halibut stocks is a political decision, while managing bycatch using abundance indices for the stock as a whole, is a sustainability decision; and,

WHEREAS, politically based management decisions that impact a long-lived, wide-ranging species such as Pacific halibut, are incompatible with an overarching goal of sustainability, abundance-based bycatch management; and,

WHEREAS, tying halibut bycatch to abundance is especially important during low levels of abundance, and the halibut population is particularly vulnerable to high bycatch caps that lead to high-take levels that could mark a point of no return for several year-classes of Pacific halibut; and,

WHEREAS, abundance-based management (ABM) would bring immediate positive results to Alaska's rural coastal communities as ABM control of bycatch means coastal communities are more sustainable because they can rely on rigorous and informed management strategies which are not only more consistent and responsive to the health of the resource, but are also more equitable, managing all halibut users on abundance, including those harvesting as bycatch; and,

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WHEREAS, the revenue generated by Alaska's coastal communities mean the state's economy is more stable long-term, as well as more diversified when coastal communities thrive, and they cannot thrive with the uncertainty of high prohibited species catches looming over them each year.

NOW, THEREFORE, BE IT RESOLVED that Pacific halibut is important to Alaskans culturally, economically, and socially. Halibut is among Alaska's most iconic seafoods. Coastal communities rely upon the species but are sadly losing access to them.

BE IT FURTHER RESOLVED that the Craig City Council strongly encourages the State of Alaska Department of Fish and Game Commissioner to take the lead in this issue. Actions to reduce all halibut bycatch caps to levels that are directly tied to the best available scientifically informed indexes of abundance will ensure that all sectors share in conserving the resource.

BE IT FURTHER RESOLVED that a copy of this resolution shall be provided to the State of Alaska Department of Fish and Game Commissioner and the North Pacific Fishery Management Council.

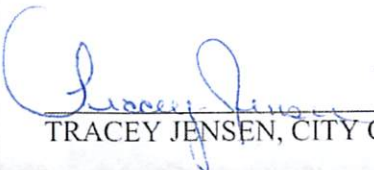
BE IT FURTHER RESOLVED that the Craig City council strongly urges managers to maintain 100% observer coverage in the Bering Sea and to implement 100% observer coverage on trawl vessels in the Gulf of Alaska; and ensure all bycaught halibut be carefully handled and returned to the sea as quickly as possible.

This resolution shall become effective immediately upon its adoption.

PASSED AND APPROVED by a duly constituted quorum of the city council this 19th day of November, 2020.



MAYOR TIM O'CONNOR



TRACEY JENSEN, CITY CLERK

