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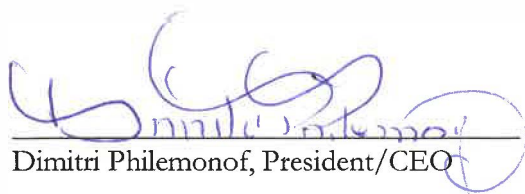
A frequently-repeated argument in favor of the status quo or even increasing the proportion of the halibut allowed to be used as Prohibited Species Catch, is that of efficient economics for the Amendment 80 vessels. But using economic efficiency as a consideration for allocation explicitly violates NS5, failing to meet the MSA requirements. By balancing access between fisheries, Alternative 4, incorporating Option 3, follows this guidance.

NS 8 plainly requires the consideration of communities, for ongoing fisheries and to minimize direct economic impact. The NPFMC's Social Impact Assessment (SIA) openly acknowledges the prioritization of Amendment 80 PSC directly closes halibut fisheries and local processing, measurably reducing local economic activity and directly resulting in community out-migration. Falling community size compounds the burdens of increased per-capita educational and health care costs, increased costs of consumer goods, and reduces transportation, among many other impacts with insufficient accounting. These losses are not balanced by any benefit to our indigenous Americans losing their access to a shared American resource outside their front door. Due to the protective effects of larger economies with much greater employment opportunities, these losses are not shared by the Amendment 80 community when prioritizing the directed fisheries.

As evidenced by the mandate to eliminate by-catch to the extent practicable, NS9 is the where Alternative 4, including Option 3, can provide significant alignment with the regulations. Over time, reduced by-catch will improve abundance, reliving competitive pressures and allowing multiple fisheries to catch halibut. Incentivizing the reduction of by-catch will improve the stock, paying dividends to fishermen and the rest of the ecosystem.

Thank you for your consideration and continued leadership. Please contact Environment and Safety Program Administrator Karen Pletnikoff at (907)276-2700 or [karenp@apiai.org](mailto:karenp@apiai.org) with any questions or additional informational needs.

Sincerely,



Dimitri Philemonof, President/CEO