



November 29, 2021

Mr. Simon Kinneen, Chairman  
North Pacific Fishery Management Council  
1007 West Third, Suite 400  
Anchorage, AK 99501

RE: Comment on Agenda Item C2 (BSAI Halibut abundance-based management ABM)

Dear Chairman Kinneen and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. We appreciate the opportunity to comment on Agenda Item C2 – BSAI Halibut abundance-based management (ABM) and acknowledge all the work that the North Pacific Fishery Management Council (Council) has done to move this action forward, investing significant time and resources dedicated to this action.

Setting prohibited species catch (PSC) limits based on an ABM approach better balances both direct and indirect (bycatch) fishing impacts on a stock and better tracks with the health of the resource. Meaningful ABM creates incentives to reduce bycatch at times when the stock is at lower abundance levels. ABSC believes this action is important not only from a policy perspective to better balance the impacts of fishing on a stock and help promote directed fisheries but also from a biological perspective.

ABSC supports consistency in management of bycatch across stocks, where possible, and supports an ABM approach. BSAI crab PSC limits have been set using an ABM approach for decades. However, as the Council considers this action, we would caution that it is important to set the PSC limits at meaningful levels to be constraining enough to create incentives to reduce bycatch, in a manner that considers the impacts to other bycatch species through continued research and monitoring, and to truly track with the health of the stock. For example, the BSAI snow crab stock was recently declared overfished and is at historic lows. While the PSC limit will be set at the lowest levels, there is a floor on the PSC limit that allows bycatch at levels higher than a straight calculation would allow. This floor on the PSC limit may not be appropriate for stocks at low levels, particularly given the uncertainty with rapidly changing ocean conditions. Similarly, bairdi abundances have caused closures to the directed fishery, yet the PSC limit has been set to the highest level.

In closing, ABSC supports an ABM approach to PSC limits for halibut to better balance both direct and indirect (bycatch) fishing impacts on a stock, to track with the health of the resource, and for consistency in bycatch management across species.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Goen', with a horizontal line extending to the right.

Jamie Goen  
Executive Director  
*Alaska Bering Sea Crabbers*  
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