



ABM HALIBUT BYCATCH

Carolyn Nichols <carenichols@hotmail.com>
To: NPFMC <npfmc.comments@noaa.gov>

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To The Council,

Please move forward with abundance based management of halibut bycatch as soon as possible.

As bycatch management stands now it is prioritizing bycatch over all other uses, over the health of the resource and coastal communities. This violates the principals of the MSA as well as being contrary to Council management of all other species.

The Council priorities should be and need to be to : protect the resource, protect the directed fisheries and fishery dependent communities and reduce bycatch.

So far the Council has done the opposite with halibut.

I believe the currant bycatch actual catch level should be the starting point and then that level should be reduced at a minimum of 20% for a starting place. In realty a minimum of 40% is a better place to reduce to to be a new starting point. The reason I think this is because the directed fishery has been reduced by far more than that and see absolutely no reasons that bycatch shouldn't be reduced by the same percentages as the directed fishery to protect the halibut stocks too!!. I don't think the bycatch cap should be the starting point. I think the catch level today(which is under the cap) should be the starting point and then it needs to be brought down from there. If you start with the full cap and reduce it from there you are going to be right where the actual bycatch level is today and will have gained no protection for the directed fishery, the resource and all other users.

I am not asking for the trawl fisheries to be shut down. I am asking for bycatch to be just that. Bycatch. And by that I mean it should not be prioritized over directed fishery and the resource.

I am asking the Council to treat halibut bycatch responsibly and to pick an index that protects the future of the halibut resource and the directed fishery.

I feel the Council needs to get moving with these objectives. Doing the right thing late is most definitely better than caving in to pressure from trawlers reluctant to share in the burden of conservation and by doing so cause the demise of the historic vibrant halibut fishery.

Along another line but similar I feel the bycatch should be calculated by the IPHC in fish, not pounds.

Thank You

Carolyn Nichols

111 Knutson Dr.

Sitka, AK 99835