August 18, 2020

Dear Alaska Native Representative:

With this letter, the National Marine Fisheries Service (NMFS) is notifying you that a preliminary draft Environmental Impact Statement (EIS) on setting Bering Sea and Aleutian Islands (BSAI) halibut prohibited species catch (PSC) limits based on Pacific halibut abundance levels will be presented to the North Pacific Fishery Management Council (Council) for initial review at their October 2020 meeting. The Council’s schedule and agenda for the October meeting may be found at: https://www.npfmc.org/upcoming-council-meetings/. This meeting will be held online, and connection instructions will be posted on the electronic agenda. The preliminary draft EIS will be available through the agenda in early September for consideration. Additional related documents, including the alternatives analyzed, may be found at: https://www.npfmc.org/octabm/.

We invite you to participate in the process and contribute toward the final decisions. NMFS and the Council will be seeking public input on this preliminary draft EIS, including comments on the alternatives analyzed and preliminary results. Methods to provide such input may also be found through the meeting agenda.

The Council has been managing Pacific halibut bycatch by a range of measures since the inception of the BSAI Fishery Management Plan in 1982 and is currently examining abundance-based approaches to set halibut PSC limits in the BSAI. Existing halibut PSC limits are a fixed amount of halibut mortality in metric tons. When halibut abundance declines, halibut PSC becomes a larger proportion of total halibut removals and can result in lower catch limits for directed halibut fisheries. Both the Council and the International Pacific Halibut Commission (IPHC) have expressed concern about impacts on directed halibut fisheries under the status quo and identified abundance-based management of halibut PSC limits as a potential management approach to address these concerns.

The objective of modifying PSC limits at this time is to index PSC limits to halibut abundance which may achieve different goals of 1) providing flexibility to the groundfish fisheries in times of high halibut abundance, 2) protecting spawning biomass of halibut especially at low levels, and 3) stabilizing inter-annual variability in PSC limits. All of these goals may provide additional harvest opportunities in the commercial halibut fishery.

The Council has been in the process of reviewing multiple discussion papers and revising a suite of alternatives for this action since 2016. The Council has previously set other PSC limits (crab and herring) based upon abundance of the stock in the BSAI. However, this action was complicated by consideration over a broad range of sources of information with which to index the BSAI portion of the coastwide halibut stock. The Council has selected two abundance indices to track Pacific halibut abundance and guide setting PSC limits in the BSAI groundfish fisheries. These are from the NMFS Alaska Fishery Science Center Eastern...
Bering Sea shelf bottom trawl survey and from the IPHC setline survey covering IPHC Areas 4ABCDE. Both indices represent the best available scientific information.

This preliminary draft EIS will provide a review of the analysis of current issues with halibut bycatch and potential ways to move the decision-making process forward. NMFS and the Council intend for a subsequent draft EIS, to be published for public review and comment, as the primary analytical document to support methods to determine abundance-based halibut PSC limits in the BSAI Amendment 80 sector. The alternatives analyzed in this preliminary draft EIS include three overarching alternatives under consideration by the Council. These have been developed through multiple discussion papers and Council considerations, and consultation with stakeholders. These alternatives range from status quo, with a fixed halibut PSC limit of 1,745 mt for the Amendment 80 sector, to abundance-based halibut PSC limits informed by one or more indices and adjusted by varying combinations of ceiling, floors, and slopes of change.

The purpose of the final EIS is to inform decision makers and the public of the impacts of halibut abundance management to the halibut resource, the fishing industry, coastal communities, and other parts of the human environment. Alternatives developed during the EIS public process will be designed to minimize to the extent practicable detrimental impacts to the halibut resource, the fishing industry, and coastal communities. For further information on this EIS, please contact Diana Stram at diana.stram@noaa.gov or Joseph Krieger at joseph.krieger@noaa.gov or (907) 586-7882.

NMFS has special obligations to consult and coordinate with tribal governments and Alaska Native Claims Settlement Act (ANCSA) corporations on a government-to-government basis pursuant to Executive Order 13175 and the Executive Memorandum of April 29, 1994, on “Government-to-Government Relations with Native American Tribal Governments.” As a result of your tribal or ANCSA corporation status, you have the opportunity to comment to NMFS at any time; however, comments submitted during the Council process in developing and analyzing the alternatives would be helpful in developing the EIS. I encourage you to submit written comments according to the instructions on the meeting agenda for this topic.

Additionally, you have the opportunity to consult with and provide comments to NMFS via remote video chat or by telephone. To request a meeting with NMFS, please contact Joseph Krieger at the above phone number or email address.

I look forward to working with you through the completion of this project.

Sincerely,

James W. Balsiger, Ph.D.
Administrator, Alaska Region