Alaska Longline
FISHERMEN'S ASSOCIATION

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Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400 Anchorage, AK 99501-2252

Re: Agenda Item E: Staff Tasking Request for Discussion Paper - Gulf of Alaska Halibut Abundance-Based Management Prohibited Species Catch Limit

Dear Ms. Drobnica and Council members,

I submit the following letter on behalf of the Alaska Longline Fishermen's Association (ALFA) requesting that you task staff to prepare a discussion paper as the first step toward developing a Gulf of Alaska Groundfish Fishery Management Plan (FMP) amendment that would establish abundance-based halibut bycatch limits for Gulf of Alaska trawl fisheries. Such an amendment would resemble the recently implemented Amendment 123 to the Bering Sea/Aleutian Islands Groundfish Fishery FMP and reduce bycatch limits when triggered by applicable abundance indices.

In developing Amendment 123, the Council recognized that fixed bycatch limits were inconsistent with management of other fisheries in Alaska that link harvests to the well-being of the stock. The Council also sought to develop a more equitable approach, so that when halibut abundance is low, the proportion of halibut taken as bycatch does not further reduce the proportion and amount of halibut available for halibut harvesters. Finally, the Council considered abundance-based bycatch limits as an important protection for the spawning stock biomass, particularly at low levels of abundance. Other conservation benefits identified by NMFS included increased survival of smaller halibut, which in the long-term would benefit both the stock and the directed fisheries. Initiating an amendment process would balance Magnuson-Stevens Act National Standards, particularly Standards 1, 8 and 9.[1]

ALFA submits these concepts should also apply to bycatch management in the Gulf of Alaska. ALFA represents and advocates for small vessel owners, deckhands, and business members from Alaska and the Pacific Northwest who participate in, or otherwise support and benefit from the Gulf of Alaska commercial halibut fishery. Halibut is one of the most valuable fish

[1] 87 Fed. Reg. 75,570, 75,756, 75,759 Fisheries of the Exclusive Economic Zone Off Alaska; Bering Sea and Aleutian Islands Halibut Abundance-Based Management of Amendment 80 Prohibited Species Catch Limit (Friday, December 9, 2022).

species in Alaska, involving hundreds of individual commercial, charter and recreational fishermen as well as marine repair businesses, fishing gear retailers, seafood processors, and other businesses that support and rely on the halibut fleet. Two-thirds of halibut fishery earnings accrue to Alaska communities and over three-fourths of fishery participants in the halibut fishery are Alaska residents. Put simply—the halibut fishery is fundamental to the socioeconomic health of coastal Alaska.

I. Fishery Management Plan provisions addressing halibut bycatch

The Council designated halibut as a prohibited species in the Gulf of Alaska Groundfish FMP, which explains that the bycatch of halibut "is wasteful and should be minimized" and requires that groundfish fishery management account for potential adverse impacts to the halibut resource.[2] Vessels targeting groundfish must avoid them while fishing, and immediately return them to the sea with minimal injury.[3] Even so, the FMP acknowledges that some fisheries can cause mortality rates approaching 100 percent.[4]

The FMP imposes an ongoing obligation to improve bycatch management.[5] The Council must consider and adopt proactive, forward-looking conservation measures that address bycatch.[6] Such measures help to achieve FMP goals, which include providing for resource conservation and for "socially and economically viable fisheries for the well-being of fishing communities."[7] The Council is to "control the bycatch of prohibited species through prohibited species catch limits or other appropriate measures" and "reduce waste to biologically and socially acceptable levels."[8] Fixed bycatch limits for species at low abundance levels are inconsistent with these concepts.

Trawl fisheries historically and currently account for most halibut bycatch mortality in the Gulf of Alaska, with hook-and-line fisheries a distant second.[9] NMFS set trawl Gulf of Alaska halibut bycatch limits at 3.3 million pounds in 1989.[10] That limit remained static for over two

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[2] North Pacific Fishery Management Council. 2024. Fishery Management Plan for the Groundfish Fisheries of the Gulf of Alaska (hereinafter Gulf of Alaska Groundfish FMP), §2.2; § 3.6.2.1 Pacific Halibut.
[3] GOA FMP, § 3.6.1
[4] Gulf of Alaska Groundfish FMP, § 3.6.2.1
[5] Gulf of Alaska Groundfish FMP, § 2.2.1.4 Manage Incidental Catch and Reduce Bycatch and Waste.
[6] Gulf of Alaska Groundfish FMP, §2.2.
[7] Gulf of Alaska Groundfish FMP, §2.2.
[8] Gulf of Alaska Groundfish FMP, § 2.2.1.4.
[9] North Pacific Fishery Management Council. 2013. Final Environmental Assessment/Regulatory Impact Review/ Initial Regulatory Flexibility Analysis to Reduce Gulf of Alaska Halibut Prohibited Species Catch Limits: Amendment 95 to the Fishery Management Plan for Groundfish of the Gulf of Alaska. November 2013. Anchorage, Alaska (hereinafter NPFMC. 2013. EA/RIR/IRFA; https://www.fisheries.noaa.gov/sites/default/files/akro/car120_psc_goa2024.html (last accessed 11/25/2024).
[10] NPFMC. 2013. EA/RIR/IRFA.

decades.[11] By 2011, declines in Gulf of Alaska halibut abundance triggered a process aimed at reducing halibut bycatch.[12] The Council's problem statement acknowledged that the exploitable biomass had decreased fifty percent over the previous decade, causing combined catch limits for halibut harvesters in regulatory Areas 2C, 3A, and 3B to drop by almost fifty percent.[13] Over a decade ago, in February 2014, NMFS issued regulations implementing Amendment 95 which established the current Gulf of Alaska trawl halibut bycatch limit of 2.9 million pounds – a comparatively small reduction (fifteen percent) relative to the conservation burden borne by halibut harvesters.[14]

Largely because of the imbalance between the small bycatch limit reduction and the large losses experienced by the directed fisheries, there were a number of comments asking NMFS to remand Amendment 95 to the Council for the development of alternatives that would cut the bycatch limits by more than fifteen percent.[15] Commenters pointed out that it was unfair to allow fisheries taking halibut as bycatch to continue taking an increasing proportion of the resource.[16] Other concerns included the need for lower limits to address biological uncertainties related to declining stock abundance and potential underestimation of halibut bycatch.[17] Commenters also believed that NMFS did not fully account for harms to halibut dependent communities caused by halibut bycatch.[18] NMFS described its decision to approve the amendment as a tradeoff that balanced the National Standard 9 obligation to minimize bycatch with the agency's belief that lower bycatch limits would increase risks of groundfish fishery closures, particularly for trawl vessels targeting flatfish.[19] The agency stated that the Council would continue to evaluate the need for additional restrictions and encouraged future participation in the Council process when the Council would consider changes in halibut bycatch management.[20]

However, since 2014, Council actions related to halibut bycatch have focused on the Bering Sea groundfish fisheries. In December 2021, after five years of analyzing ways to minimize halibut bycatch in response to ongoing resource declines, the Council formally initiated a regulatory process that would reduce bycatch limits for the largest Bering Sea trawl sector at

[11] NPFMC. 2013. EA/RIR/IRFA.
[12] 79 Fed. Reg. 9625, 9631. Fisheries of the Exclusive Economic Zone Off Alaska; Groundfish of the Gulf of Alaska; Amendment 95 to the Fishery Management Plan for Groundfish (Thursday, February 20, 2014).
[13] NPFMC. 2013. EA/RIR/IRFA.
[14] 79 Fed. Reg. 9625; 50 CFR § 679.21(d)(3).
[15] 79 Fed. Reg. at 9630-9633.
[16] 79 Fed. Reg. at 9630-33; 9637.
[17] 79 Fed. Reg. at 9630-33.
[18] 79 Fed. Reg. at 9635.
[19] 79 Fed. Reg. at 9632, 9633.
[20] 79 Fed. Reg. at 9630-9633.

different levels of halibut abundance.[21] In November 2023, NMFS issued its final rule implementing the new limits, which link to several halibut abundance ranges derived from two indices – the IPHC Index (Fishery Independent Setline Survey) and Eastern Bering Sea Shelf trawl survey.[22]

Now that NMFS and the Council have completed that process, it is time to initiate the process of implementing abundance-based management for the Gulf of Alaska trawl fisheries, which are the largest source of halibut bycatch mortality managed under the applicable FMP. When developing a regulatory amendment to change a halibut bycatch limit, NMFS and the Council consider information that includes, among other things: (1) estimated change in halibut biomass and stock condition; (2) potential impacts on halibut stocks and fisheries and other biological and socioeconomic factors that affect the appropriateness of a specific PSC limit in light of FMP objectives.[23] The following discussion reviews current stock condition and the socio-economic importance of the halibut fishery to Alaska coastal communities.

The current condition of the halibut stocks justifies applying abundance-based bycatch management for Gulf of Alaska trawl fisheries

As shown below in Figure 7 prepared by IPHC scientists, the halibut stock declined

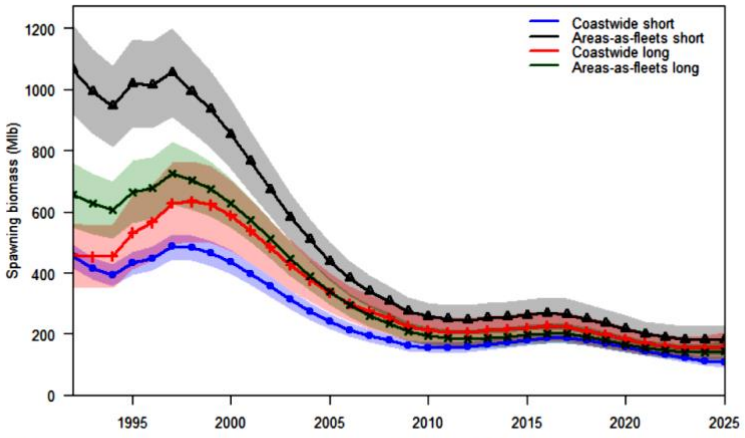


Figure 7. Estimated spawning biomass trends (1992-2025) based on the four individual models included in the 2024 stock assessment ensemble. Series indicate the maximum likelihood estimates; shaded intervals indicate approximate 95% credible intervals.

[21] NMFS & NPFMC. 2022. Final Environmental Impact Statement (FEIS) for the Bering Sea and Aleutian Islands (BSAI) Halibut Abundance-Based Management (ABM) of Amendment 80 Prohibited Species Catch Limit. Amendment 123 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area. December 2022. National Marine Fisheries Service, Juneau, AK.

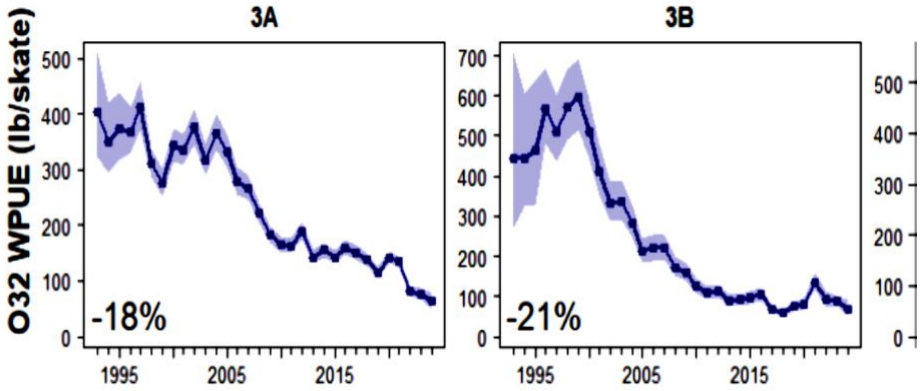
[22] NMFS. 2023. Fisheries of the Exclusive Economic Zone off Alaska. Bering Sea/Aleutian Islands Halibut Abundance-Based Management of Amendment 80 Prohibited Species Catch Limit. Final Rule. 88 Fed. Reg. 82,740 (November 23, 2023).

[23] GOA FMP, § 3.6.2.1. Other factors include potential impacts on groundfish fisheries; estimated PSC during prior years; expected halibut PSC; methods available to reduce halibut PSC and the cost of reducing halibut PSC.

continuously from the late 1990s to 2012, largely because of decreasing size at age and lower recruitment rates.[24] There was then a brief period of time when the spawning biomass slowly increased through 2016. [25]

The spawning biomass then declined to an estimated 145 million pounds at beginning of 2024.[26] It is now near the lowest levels observed since the 1970s.[27] IPHC scientists anticipate a *slight* increase in spawning biomass to 147 million pounds in 2025 as the 2012 and 2016 year classes continue to grow.[28] The 2012 and 2016 year classes are below average in size but larger than the 2006-2011 year classes that preceded them.[29] The two classes dominate the current spawning biomass but are not large enough to support any meaningful increases in fishery yields.[30] The stock is in a state of historically low productivity - recruitment has been poor for nearly twenty years.[31] This situation is ongoing and it is unclear when or if it will change.[32]

Directed commercial fishery catch rates in nearly all regulatory areas were at or near lowest observed in last 40 years.[33] Figure 4 to the left from the 2024 stock assessment shows some of the greatest ongoing reductions in weight per unit effort (WPUE) in Gulf of Alaska Areas 3A and 3B.[34] The proportion of the stock distribution in these two areas is diminishing.[35]



[24] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. Data overview and stock assessment for Pacific halibut (*Hippoglossus stenolepis*) at the end of 2024. IPHC-2024-IM100-11.
[25] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[26] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[27] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[28] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[29] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[30] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11; Stewart, I. & A. Hicks. 2024. Stock projections and the harvest decision table for 2025-2027.. IPHC-2024-IM100-13 Rev_1.
[31] I. Stewart, I. & A. Hicks. 2024. Powerpoint Presentation, Agenda item: 7.1 Stock projections and harvest decision table for 2025-2027; Stewart, I. & A. Hicks. 2024. IPHC-2024-IM100-13 Rev_1.
[32] I. Stewart, I. & A. Hicks. 2024. Powerpoint Presentation, Agenda item: 7.1; Stewart, I. & A. Hicks. 2024. IPHC-2024-IM100-13 Rev_1.
[33] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[34] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.
[35] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11.

The National Standard 9 guidelines also require decisionmakers to adhere to the precautionary approach when faced with uncertainty regarding, among other things, population effects for the bycatch species.[36] There is high uncertainty about ecosystem conditions for halibut, as current conditions are unpredictable with new patterns emerging each year.[37] The Pacific Decadal Oscillation was positive from 2014-2019, which would normally suggest higher recruitment but has been negative since 2020 when lower recruitment would be expected.[38] However, because of increased environmental variability, IPHC scientists caution that historical productivity patterns may not reliably inform future conditions, particularly whether productivity may increase or decrease at critical life stages.[39] Other uncertainties about population effects that warrant linking limits to abundance include, among others, an inadequate understanding of why there has been substantial variability in weight at age and highly variable recruitment over time.[40]

Further, over one-third of the halibut typically taken as bycatch in the Gulf of Alaska are juvenile fish (<26 inches in length).[41] There has long been a concern with juvenile halibut bycatch regarding both loss of value and stock productivity.[42] The most recent IPHC analysis indicates that the future loss is much greater than the weight of juvenile halibut taken as bycatch because forgone annual weight gains of that fish cohort would exceed loss from natural mortality.[43] Bycatch reductions result in directed halibut fishery catches at more than a 1:1 ratio.[44] The rate is variable over time and depends on the location of the bycatch fishery and the size and age of halibut killed by trawlers.[45] By reducing the numbers of juvenile halibut killed, this action could benefit halibut dependent communities throughout the North Pacific coast by increasing the numbers of juvenile halibut which grow over a

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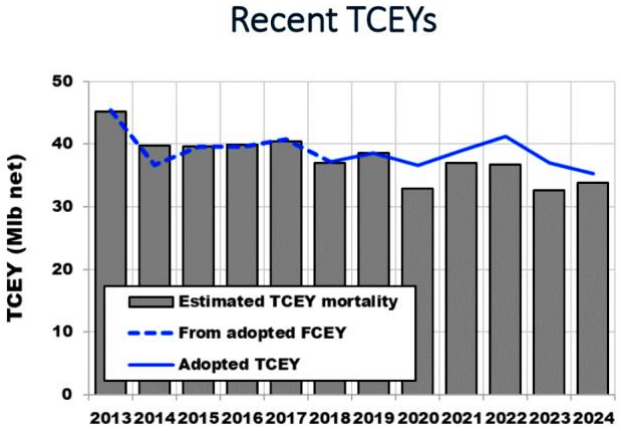
[36] 50 C.F.R. § 600.350(d)(3)(i), (ii).
[37] I. Stewart, I. & A. Hicks. 2024. Powerpoint Presentation, Agenda item 7.1; Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. Powerpoint Presentation, Agenda item: 5.2. Data overview and stock assessment for Pacific halibut (Hippoglossus stenolepis) at the end of 2024.
[38] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. Powerpoint Presentation, Agenda item: 5.2.
[39] Stewart, I. & A. Hicks. 2024. IPHC-2024-IM100-13 Rev_1.
[40] Scientific and Statistical Committee Final Report to the North Pacific Fishery Management Council April 5th – 8th, 2021.
[41] NPFMC. 2013. EA/RIR/IRFA.
[42] *See* Magnuson-Stevens Act National Guidelines, Proposed Rule. 62 Fed. Reg. 41,907, 41011. August 4, 1997; Clark, W.G. & Hare, S.R. 1998. Accounting for bycatch in management of the Pacific halibut fishery. *North American Journal of Fisheries Management*, *18*(4), pp.809-821; Carpi, P., Loher, T. & Sadorus, L.L. et al. 2021. Ontogenetic and spawning migration of Pacific halibut: a review. *Rev Fish Biol Fisheries, 31*, pp.879–908. Webster, R.A., Clark, W.G., Leaman, B.M. & Forsberg, J.E. 2013. Pacific halibut on the move: a renewed understanding of adult migration from a coastwide tagging study. *Canadian Journal of Fisheries and Aquatic Sciences*, *70*(4), pp.642-653; Valero, J.L. & Hare, S.R. 2011. Evaluation of the impact of migration on lost yield, lost spawning biomass, and lost egg production due to U32 bycatch and wastage mortalities of Pacific halibut. Int. Pac. Halibut Comm. Report of Assessment and Research Activities, 2010, pp.261-280.
[43] Stewart, I.J., Hicks, A.C. & Carpi, P. 2021. Fully subscribed: Evaluating yield trade-offs among fishery sectors utilizing the Pacific halibut resource. *Fisheries Research*, *234*, p.105800.
[44] *Id.*
[45] *Id.*

period of years and recruit to the resource and fishery, supporting resource productivity and future fishery yield.

The value of halibut to Alaska coastal communities justifies applying abundance-based bycatch management to Gulf of Alaska trawl fisheries



The current situation is troubling for directed fishery efficiency and economic viability.[46] Commercial landings are at the lowest levels since the mid-1970s, and it has been a more prolonged period of lower abundance.[47] Directed fishery catch limits have generally declined over the past decade.[48] As shown to the left,[49] total halibut quotas have dropped and remained at low levels since NMFS approved Amendment 95. For Gulf of Alaska areas, in 2013 the quota for Area 3A and 3B was nearly 24 million pounds; in 2024 it was 14.8 million pounds.[50] The Area 2C quota reached 7 million pounds in 2017 but has been below 6 million pounds each of the past five years.[51] Bycatch limits have remained static since 2014. Between 2019 and 2023, estimated halibut bycatch in the Gulf of Alaska trawl fisheries varied considerably, cumulatively exceeding 6.3 million pounds over the five-year period with a peak of 2.4 million pounds in 2019.[52]

The National Standard 9 guidelines provide a list of nine factors that include environmental impacts, non-market values and effect to fisheries targeting the bycaught species.[53] The regulations separately list other factors (including socio-economic effects) to consider when determining whether a management measure minimizes bycatch or bycatch mortality to the extent practicable.[54] Potential economic losses to industries responsible for bycatch are just one of those ten factors.[55]

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[46] Stewart, I. & A. Hicks. 2024. IPHC-2024-IM100-13 Rev_1.
[47] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. IPHC-2024-IM100-11; *see* Figure 2.
[48] *Id.* at 75,751.
[49] Stewart, I., Hicks, A., Webster, R., & D. Wilson. 2024. Powerpoint Presentation, Agenda item: 5.2.
[50] Stewart, I. & A. Hicks. 2024. IPHC-2024-IM100-13 Rev_1.
[51] Stewart, I. & A. Hicks. 2024. IPHC-2024-IM100-13 Rev_1.
[52] *Available at*: https://www.fisheries.noaa.gov/alaska/commercial-fishing/fisheries-catch-and-landings-reports-alaska (last accessed 11/24/2024) ALFA converted the estimated bycatch numbers from metric tons to round pounds using the following formula: [metric tons] x 2204.6).
[53] 50 C.F.R. § 600.350(d).
[54] *Id.*
[55] Magnuson-Stevens Act Provisions, National Standard Guidelines, Final Rule. 63 Fed. Reg. 24,212, 24,226 (May 1, 1998).

With regard to linking bycatch limits to abundance, the short-term and long-term impacts to fisheries targeting halibut should be one of the most critical factors because halibut bycatch adversely impacts directed fisheries and communities throughout Alaska and the Pacific Northwest. Halibut is one of Alaska's most valuable commercial fish species, typically fetching ex-vessel prices that range between $5.00 and $8.00 per pound and generate high values when retailed as fillets or when served at restaurants.[56] The IPHC's recent Pacific Halibut Multiregional Economic Impact Assessments quantify the economic impacts that occur as harvested halibut migrate from the hook to the plate, generating economic activity for processors, wholesalers, retailers and services.[57] Each dollar in commercial landing value generates over $4 in economic activity: the 2019 coastwide value of $134.1 million was worth over $550 million in total economic activity, generating over 5,000 jobs.[58] The economic benefits accrue mostly in Alaska coastal communities where residents own over 90 percent of the active vessels and individual permits.[59] Over two-thirds of revenues from the 2019 halibut fishery accrued in Alaska communities.[60] Residents of other states, mostly Washington, own significant amounts of the Alaska halibut quota but deliver almost all their fish in Alaska.[61]

Availability of these fish for harvesting and processing is critical to Alaska's coastal fishing community economies. Another recent study, by the University of Alaska Anchorage's Institute of Social and Economic Research, showed that resident permit holder earnings – and local landings by non-resident fishermen – create induced economic activity that supports a diverse array of other businesses.[62] Every $1 million in local fish harvests generates over $1.5 million in earnings by other local economic endeavors.[63] When Alaska halibut harvests and local landings are lower – whether due to low abundance, bycatch or both - fishermen spend less locally on fuel, fishing gear, groceries, vessel repair and maintenance, resulting in less indirect employment and wage incomes.[64]

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[56] Abelman, A., M. Dalton, R. Dame, B. Fissel, B. Garber-Yonts, S. Kasperski, J. Lee, D. Lew, C. Seung, M. Szymkowiak & S. Wise. 2023. Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska and Bering Sea Aleutians Island Area: Economic Status of the Groundfish Fisheries Off Alaska, 2023; Hutniczak, B. 2022. Pacific Halibut Multiregional Economic Impact Assessment (PHMEIA) – Project Report. IPHC-2022-AM098-INF04; Hutniczak, B. 2021. Pacific Halibut Multiregional Economic Impact Assessment (PHMEIA): summary of progress. IPHC-2021-AM-097-14.
[57] Hutniczak, B. 2021. IPHC-2021-AM-097-14; Hutniczak, B. 2022. IPHC-2022-AM098-INF04
[58] Hutniczak, B. 2022. IPHC-2022-AM098-INF04
[59] Id.
[60] Hutniczak, B. 2021.
[61] Hutniczak, B. 2022; NPFMC. 2013. EA/RIR/IRFA.
[62] Watson, B., Reimer, M.N., Guettabi, M. & Haynie, A. 2021. Commercial Fishing and Local Economies. Institute of Social and Economic Research, University of Alaska Anchorage, Anchorage, AK.
[63] Watson, B., Reimer, M.N., Guettabi, M. & Haynie, A.
[64] Hutniczak, B. 2020.

Benefits from the halibut fishery are widely distributed. The active Gulf of Alaska halibut fleet has a large and diverse number of participants - there are over 700 halibut fishing vessels active in the Gulf of Alaska.[65] Nearly 90% of them are between 30 and 59 feet in length.[66] Remaining vessels are either skiffs or larger vessels such as the iconic halibut schooners.[67] The ex-vessel value of the Gulf of Alaska halibut fishery for these fishermen was $111 million in 2021 and $127 million in 2022.[68] The top Gulf of Alaska halibut ports are Homer, Seward and Kodiak, followed by four Southeast Alaska ports: Sitka, Juneau, Petersburg and Yakutat.[69] Southeast Alaska communities have the highest dependence on halibut fisheries and the highest proportion of direct earnings per dollar in landed value in the state.[70] As shown in Table 2 in Appendix A, numerous other Southeast Alaska communities have significant dependence on halibut fisheries.

Trawl bycatch suppresses the value of these fisheries to Alaska fishing communities. In the Gulf of Alaska, the value of halibut discarded by trawlers targeting flatfish can exceed the value of their targeted catch.[71] The impact of halibut bycatch on coastal Alaska fishing community access to halibut is a classic "externalities problem," a conflict between the bycatch of high-value fish species being killed and wasted in the pursuit of lower-value – but higher-volume – trawl catches.[72] Except for Pacific cod, the species targeted by Gulf of Alaska trawlers are mostly lower-value groundfish such as pollock and flatfish.[73] As shown in Appendix A, Figure 1, the economic losses caused by halibut mortality in these fisheries is significant.

Conclusion

ALFA requests that the Council initiate a process to develop a Gulf of Alaska Groundfish Fishery FMP amendment implementing abundance-based bycatch limits. Under abundance-based management, bycatch mortality may be lower and less likely to become a larger proportion of the total halibut catch, preventing further imbalance among halibut resource users. The abundance-based approach also better aligns bycatch management with directed fishery management. Abundance-based bycatch limits can ameliorate the impacts of bycatch by providing conservation at low abundance rather than resting the full conservation

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[65] Abelman, A., M. Dalton, B. Fissel, B. Garber-Yonts, S. Kasperski, J. Lee, D. Lew, C. Seung, M. D. Smith, M. Szymkowiak, S. Wise. 2023. Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska and Bering Sea/Aleutian Islands Area: Economic Status of the Groundfish Fisheries Off Alaska.
[66] *Id.*
[67] *Id.*
[68] *Id*. *See* Table 4.48.
[69] Abelman, A. et al. 2023.
[70] Hutniczak, B. 2022. IPHC-2022-AM098-INF04.
[71] Warrenchuk, J. et al. 2022.
[72] Kass, M.J. 2016. Alaskan halibut: a bycatch trifecta. *Natural Resources & Environment, 30*(3).
[73] Abelman, A. et al. 2023.

responsibility on the directed fishery. Moving forward with an amendment will benefit halibut-dependent communities for whom the halibut fishery is a way of life, a cultural touchstone, and critical source of income.

Abundance-based management of GOA halibut bycatch would further the goals of the Sustainable Fisheries Act. Congress enacted the Sustainable Fisheries Act in 1996, adding National Standard 9 to the Magnuson-Stevens Act in large part because larger vessels were taking increasing proportions of recreationally, commercially, and culturally valuable fish species as bycatch and displacing smaller boat fisheries.[74] National Standard 9 requires that "[c]onservation and management measures, shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch."[75] NMFS' evaluation of Amendment 123 determined that the benefits of lower halibut bycatch mortality outweighed potential forgone revenue for the Amendment 80 companies.[76] The lower limits may incentivize further efforts by the trawl industry to minimize bycatch as required by the Magnuson-Stevens Act, at times incurring additional costs whether through reducing effort in areas of higher halibut abundance or through lowered industrial efficiency.[77] *These costs were most likely to occur at lower abundance levels when heightened conservation efforts are necessary*.[78]

Thank you for reviewing our comments.

Sincerely,

Linda Behnken
Executive Director

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[74] 142 Cong. Rec. S10794, 10810-12 (daily ed. September 18, 1996)(statements of Sen. Stevens and Sen. Kerry); 141 Cong. Rec. S247-48 (January 4, 1995)(statement of Sen. Kerry); *NRDC v. NMFS,* 421 F.3d 872, 879 (9th Cir. 2005)(citing *NRDC v. Daley,* 209 F.3d 747, 753 (D.C. Cir. 2000).
[75] 16 U.S.C. § 1862(a)(1); 50 C.F.R. § 600.350(a).
[76] 87 Fed. Reg. at 75,781
[77] *Id.* at 75,780-81.
[78] *Id.*

Appendix A: Commercial Halibut Fishery Economic Performance

TABLE 1: 2022 TOP GULF OF ALASKA PORTS[79]

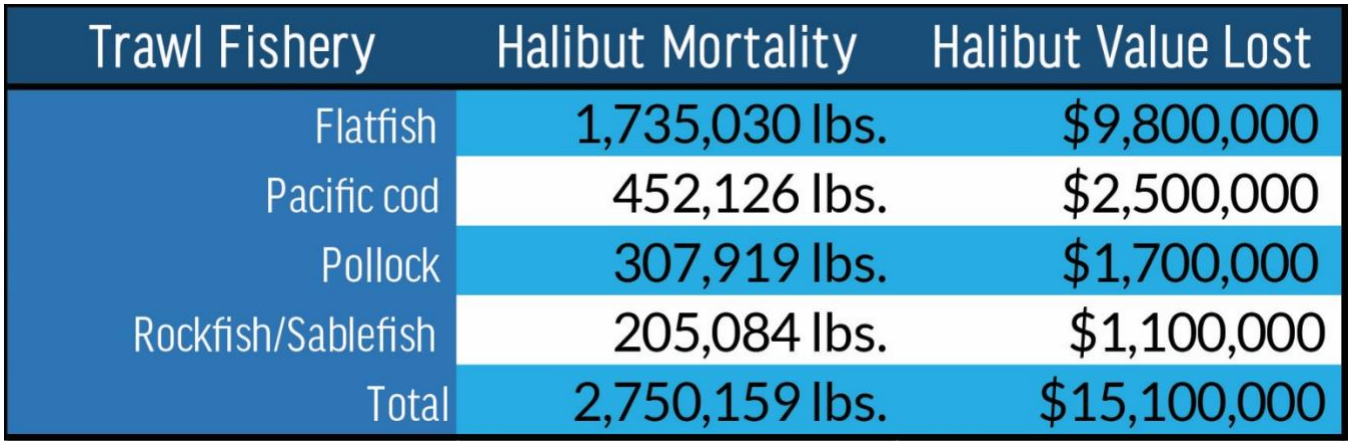
Port	2022 Ex-vessel Value (million $)	2022 price	% of Alaska Value	Rank
Homer	$21.39	$7.78	14%	1
Kodiak	$20.98	$6.94	14%	2
Seward	$16.59	$7.44	11%	3
Sitka	$10.47	$6.70	7%	4
Juneau	$9.41	$7.63	6%	5
Petersburg	$8.65	$7.48	6%	8

TABLE 2: 2022 HALIBUT LANDED BY SOUTHEAST ALASKA RESIDENTS[80]

Borough	Active Permits	Pounds	Ex-vessel value
Haines	24	320,000	$1,910,000
Hoonah	34	180,000	$1,069,000
Juneau	78	857,000	$4,994,000
Ketchikan	27	365,000	$2,188,000
Petersburg	148	2,130,000	$12,699,000
Prince of Wales	38	195,000	$1,152,000
Sitka	149	1,891,000	$10,176,000
Wrangell	46	445,000	$2,755,000
Yakutat	23	417,000	$2,563,000
Southeast Alaska	**567**	**6,800,000**	**$39,506,000**

[79] Abelman, A. et al. 2023.
[80] Alaska Commercial Fisheries Entry Commission. 2023. Halibut Permit & Fishing Activity by Year, State, Census Area, or City, 2022. https://www.cfec.state.ak.us/fishery_statistics/earnings.htm

Figure 1: Average annual halibut bycatch mortality in Gulf of Alaska trawl fisheries 2015-2019. Graphic credit: Oceana (Warrenchuk, J., Karnik, J., Mecum, B., Enticknap, B. & Murray, S. 2022. Net loss: the costs of bottom trawling in the Gulf of Alaska).



Trawl Fishery	Halibut Mortality	Halibut Value Lost
Flatfish	1,735,030 lbs.	$9,800,000
Pacific cod	452,126 lbs.	$2,500,000
Pollock	307,919 lbs.	$1,700,000
Rockfish/Sablefish	205,084 lbs.	$1,100,000
Total	2,750,159 lbs.	$15,100,000