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North Pacific Fishery Management Council
605 West 4th Street, Ste 306
Anchorage, AK 99501

Agenda Item C:1 ABM

Dear Chairman Kinneen,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA).

ALFA members commend the ABM workgroup for the tremendous amount of work dedicated to this issue, and for the substantial progress that has been made over the past six months. While we know there will be course corrections to the model, the alternatives, and the analysis arising from the October meeting, we are greatly encouraged by the development of a working operating model and by the depth of the Draft EIS. We offer these comments to add momentum to that progress.

Purpose and Need

Because all alternatives will ultimately be measured against the identified purpose and need, we wanted to briefly remind the Council of the issues that launched this amendment.

The International Pacific Halibut Commission (IPHC) subtracts bycatch of over 26-inch halibut (026) from the total allowable catch in each area before setting catch limits for the directed fisheries. In 2013, halibut bycatch in the Bering Sea reached a level that not only threatened to preempt the directed halibut fishery but also exceeded the Bering Sea total allowable catch (or Total Constant Exploitation Yield, TCEY, in IPHC terminology), requiring the Commission to contemplate preempting the directed fishery and "borrowing" halibut from the Gulf just to cover bycatch—clearly not a scientifically or socially acceptable response. The crisis was averted by voluntary action from the Amendment 80 fleet to reduce bycatch, but the situation highlighted the Council's role in sustainable management of the halibut stock and fishery. The IPHC can only conserve the halibut spawning biomass at times of low abundance by reducing catch limits in the directed fishery. Once the directed fishery quota is consumed, the IPHC cannot protect the spawning biomass from unsustainable removals by the bycatch fisheries. At extreme levels of low coastwide abundance (B30), the IPHC's control rule for the directed fishery linearly reduces directed fisheries across all areas and eventually curtails directed harvest if spawning biomass continues to drop (B20). However, no comparable measure is in place for the groundfish fisheries. In other words—no Over Fishing Level (OFL) is specified for halibut at the area or coastwide level in the Council arena, therefore no management response is mandated. As a result, one of the objectives driving ABM was—and is--the need to provide the Council with tools to protect the halibut spawning biomass, particularly at times of low abundance.

The other major objective is to prevent the *de facto* reallocation of the halibut resource from the directed fisheries to the bycatch fisheries. As the analysis states: "When halibut abundance declines, PSC becomes

a larger proportion of total halibut removals and thereby further reduces the proportion and amount of halibut available for harvest in directed halibut fisheries." Again, bycatch is deducted from the TCEY before directed fishery catch limits are set, allowing the bycatch fisheries to preempt the directed fisheries at times of low abundance under the current fixed caps. In other words, the directed fisheries bear the full burden of conservation as abundance decreases. Given the biological, social, cultural and economic importance of the halibut resource and fishery, these two objectives—protecting the spawning biomass and providing for the directed fishery-- are the driving force behind this action and paramount in the evaluation of alternatives.

The connection to alternatives will be discussed in greater detail below, but relative to the purpose and need, we would call the Council's attention to the language on page 6 (and repeated elsewhere in the document) that inappropriately identifies as a purpose of this action: "stabilizing inter-annual variability in PSC limits." Clearly abundance-based management is not intended to provide stability in PSC limits, since fixed limits are far more stable than abundance-based limits. PSC limit instability is not a problem that needs solving; protection of the halibut spawning biomass and preventing preemption of the directed halibut fishery are problems the Council needs to address with this action. In addressing these problems, the Council has signaled its intent to provide some stability in PSC limits on an inter-annual basis, but again—stability is not the objective. ALFA requests that the phrasing of the Council objectives on page 6 be realigned with the original objectives, which are more accurately captured in the bulleted points on page 18.

Protecting the spawning biomass

ALFA members are concerned that none of the alternatives include a mechanism to curtail groundfish harvest in times of extreme low abundance. From the beginning, we have advocated for a control rule that significantly reduces PSC limits if coastwide halibut spawning biomass reaches IPHC benchmark levels, such as B30, and curtails or reduces to very minimal levels halibut bycatch at critical spawning biomass levels (e.g., B20). We believe such a control rule needs to be incorporated into the suite of elements available to the Council. This control rule would be consistent with the NPFMC objective of preserving spawning stock biomass, especially at low levels of abundance, and would take into account that the Bering Sea is a known halibut nursery area from which halibut migrate to other IPHC regulatory areas, contributing to spawning stock biomass across the entire range of the halibut population. For this reason, a coastwide index of spawning stock biomass is a reasonable metric and one that would be consistent with management of the directed fishery. We strongly recommend that the Council add a control rule that can be incorporated into any of the alternatives that provides this protection to the spawning biomass.

Providing for a directed fishery

Catch limits for the directed halibut fishery are set based on the abundance of over 26-inch halibut (026). The standardized setline survey measures 026 halibut. Bycatch of 026 halibut is deducted from the area TCEY before the fishery catch limit is set each year**. In short—the measure of abundance that matters to the directed fishery is the setline survey**, and only by indexing PSC limits to the setline survey will the Council meet the objective of "providing the opportunity for directed fishery harvest." ALFA strongly supports alternatives, such as 2.4 and 3.3a, that use the setline survey as the primary index for both trawl and non-trawl PSC limits.

To further illustrate the importance of using the setline survey as the primary index, consider a scenario that instead uses the Bering Sea Trawl Survey (BTS) as the index. At a time when U26 inch halibut are abundant and well represented in the BTS, the PSC limit would be high. If during this same time the abundance of 026 halibut was low, the Bering Sea TCEY would be low, bycatch would consume most if not all of the available harvest, and the directed fishery would once again be preempted. In short, the use of the BTS does NOT meet the Council objective of providing for a directed fishery or protecting the spawning biomass.

That said, the BTS does provide a reasonable index of halibut abundance and should be incorporated as a secondary index to ensure the PSC limit responds to large year classes of small halibut—or the absence of small halibut. As the analysis states: "the AFSC believes the Pacific halibut CPUE, calculated from the EBS shelf survey, is an accurate and consistent enumerator of relative animal density. Pacific halibut also received the highest score for confidence in the enumeration of weight and counts in the EBS shelf survey" (p. 34) The BTS enumerates the under 26 inch halibut that are not included in the setline survey, hence will reflect changes in the relative abundance of this component of the halibut stock and should modify the PSC limit accordingly. Since under 26-inch halibut currently represents less than 40 percent of trawl bycatch, the impact of the secondary index should be comparably limited.

Performance Metrics

As stated above, the purpose and need should drive the Council's identification of performance metrics, and the performance metrics should correspond to the Council's objectives for this action. With this in mind, ALFA requests that the Council reconsider the Work Group's decision to base the evaluation of alternatives relative to the objective "index to abundance" on a "by gear" basis. To clarify: the table on page 19 assigns an orange "poor" performance color to alternative 3.3a in the "index to abundance" column because the measure of abundance for trawl gear is the trawl survey. Had the alternative been evaluated relative to the setline survey "index to abundance," the performance rating would have been blue. As explained above, from ALFA's perspective the setline survey is the abundance index that best meets the Council's objectives for this action. We recommend that that the table be amended to evaluate the alternatives against the setline survey index or spawning biomass. At minimum, we ask that the alternatives be evaluated relative to both indices—setline and BTS.

The operating model

Our review of the operating model revealed a number of issues that we believe should be corrected to ensure the alternatives can be evaluated relative to their impacts on the halibut stock and the directed halibut fishery. We anticipate these issues will be discussed at the SSC, but they are listed below to call them to the Council's attention prior to the meeting. The issues are:

1) U26 mortality is not accounted for in the TCEY as it is in the IPHC's management strategy;
2) The fraction of the TCEY assigned to the Bering Sea is constant at the historical average (page 210), and does not respond to the relative abundance as it does in the IPHC's management strategy;
3) The IPHC's 30:20 directed fishery harvest control rule is missing. With all simulations showing dramatically reduced biomass levels, this control rule would be causing sharp reductions in directed fishery catch limits;
4) PSC usage relative to the limit is fixed at a constant proportion (page 214). As a result, if the PSC limits go down, the usage also goes down to exactly the same degree. This exaggerates impacts and is not a reasonable assumption.

ALFA is concerned that evaluating the relative effects of the alternatives on the halibut stock and the directed fishery is not possible until these model shortcomings are corrected. We will listen carefully to the SSC discussion of the model and anticipate corrections.

Conclusion

In closing, ALFA is encouraged by the progress made over the spring/summer by the ABM work group and appreciative of the Herculean effort to construct the operating model, prepare the Draft EIS, and compile the draft Social Impact Assessment. We understand that this meeting provides an opportunity to adjust the model without changing the timeline for final action, as well as an opportunity to clarify alternatives, specify performance metrics and ensure the alternatives available to the Council are well formulated to meet the Council's objectives. To accomplish these goals, we strongly recommend that the

purpose and need statement for this action retain original objectives, and that a control rule be added that substantially curtails bycatch at IPHC low spawning biomass benchmarks to ensure ABM accomplishes conservation objectives. In addition, we strongly support alternatives that use the setline survey as the primary index, as we believe the use of this index is imperative to achieving the objectives fundamental to this action—in other words, we support Alternatives 3.3a and the corrected Alternative 2.4. Along with recognizing the central role of the setline survey in defining abundance, we ask that the performance metric "index to abundance" evaluate alternatives relative to abundance measured by the setline survey, instead of or at least in addition to measuring performance against the trawl survey. Finally, we request a few important corrections to the operating model.

Thank you for the opportunity to comment.

Sincerely,

Linda Behnken
(Executive Director, ALFA)