

September 29, 2020

Chairman Kinneen and Members of the Council:

Re: Agenda Item C6 BSAI Halibut ABM

My name is Simeon Swetzof, Jr., owner and captain of the F/V Wind Dancer.

As you know our local halibut fleet commercial fishery is **100% dependent** on halibut. We have developed our local fleet and related infrastructure to provide an economy for our residents over the last forty years! Our community is also heavily dependent upon subsistence halibut – even more so during these harsh economic times. I personally experienced that this year when I volunteered to go subsistence fishing for the community, and delivered an estimated 2500 lbs to residents, and still had requests for more.

I have been subsistence halibut fishing my whole life and commercial halibut fishing for 38 years here on St. Paul. I hire local crew members and their future is heavily dependent on a well-managed halibut resource.

The amount of halibut bycatch in the Bering Sea is totally unacceptable. Halibut bycatch caps were set when halibut were more abundant, and caps must now be reduced and tied to halibut abundance. Halibut has tremendous cultural, recreational and economic value to Alaskans, and to people from the Lower 48 who travel to Alaska to fish, or for those who enjoy eating halibut at home or in restaurants. It's a high value fish, served in the finest of restaurants. Unless bycatch caps are reduced, the fishermen in the directed fishery, those who depend upon the halibut resource, will continue to pay the cost of bycatch and bear the full brunt of conserving the halibut resource at low levels of abundance. The Council has a mandated responsibility to reduce bycatch and to provide for fishery dependent communities. Please take responsibility for the halibut resource and all who depend upon it by reducing bycatch caps and tying future caps to halibut abundance.

Also, National Standards for Allocation state:

National Standard 4 – Allocations

Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be (a) fair and equitable to all such fishermen; (b) reasonably calculated to promote conservation; and (c) carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of such privilege.

National Standard 8 – Communities

Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirement of paragraph (2) [i.e., National Standard 2], in order to (a) provide for the sustained participation of such communities, and (b) to the extent practicable, minimize adverse economic impacts on such communities.

National Standard 9 – Bycatch

Conservation 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.

It is incumbent upon you to take appropriate action and lower the bycatch amount. It is the right thing to do.

Sincerely,



Simeon Swetzof, Jr.

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