

OCEAN PEACE, INC.

FISHING VESSEL MANAGEMENT COMPANY

F/V Alaska Victory - F/V Alaska Warrior - F/V Green Hope - F/V Ocean Peace - F/V Seafisher

April 2, 2021

North Pacific Fishery
1007 West Third, Suite
Anchorage, AK 99501

Dear Chairman Kineer

This letter should be revised and resubmitted as it is unclear what the author is blaming his bycatch on. He claims "*Environmental Conditions*" are the culprit, but gives no clue what conditions they are. Is he referring to high winds, large waves, warm water, or strong currents? Very poor writing for someone who is a Director.

Ocean Peace, Inc. owns and operates four Amendment 80 (A80) catcher processors that are part of the Alaska Seafood Cooperative (AKSC). Our company annually employs approximately 400 fishermen, many of whom have worked with us for a long time. As a business, an employer, and a provider of food to both U.S. and worldwide consumers; any further reductions in halibut will have devastating impacts to our company and the people who depend on us not only for their livelihood, but for an affordable, sustainably harvested protein source.

As shown in the analysis, in some years we are quite successful at avoiding halibut, but the underlying reasons for that success or lack thereof have not been fully explored. In talking to our captains and as noted in the AKSC letter, I believe environmental conditions that are beyond our control play a large role in our successes and failures at avoiding halibut. We have put in the hard work necessary to create and fully implement tools such as deck sorting and our halibut avoidance plan and A80 has clearly shown that we take the issue of halibut bycatch seriously. In spite of this, we are being asked to do more and to accept reductions even though we are fully utilizing the tools developed with the Council to reduce halibut bycatch to the extent practicable. There are no new tools on the horizon that will allow us to adapt to further reductions.

Halibut bycatch is vacillating at a greatly reduced level compared to pre-2015, but our ability to succeed or fail appears to be largely driven by environmental factors beyond our control. All tools have been fully implemented, but our environment is changing in the North Pacific. When environmental conditions allow us to reduce bycatch we're able to do so, but when it doesn't the only option we may have under reduced caps is to not fish and that is not consistent with the mandate of achieving optimum yield given we are employing every available tool to reduced halibut bycatch.

I believe the weight of evidence produced by those in and representing the A80 sector clearly show how lopsided this action will be if an alternative other than status quo is selected. Any reduction to our sector's halibut will have devastating impacts to one or more A80 companies while producing little benefit to the directed fishery and no benefit to the halibut stock as a whole. The magnitude of our reductions has come at a high cost in terms of lost efficiency, fuel used, money spent, scientific effort expended, and voluntary efforts when the directed fishery needed it most. We will continue to employ every available tool, but it would be irresponsible for me to pretend we can do more when I know that is not possible.

Respectfully,

Todd M. Loomis
Director of Government & Industry Affairs
Ocean Peace, Inc.

4201 21st Avenue West • Seattle, Washington

All comments submitted by Ocean Peace and its employees should be rejected or read with skepticism.

Several comments have been submitted by Ocean Peace employees. However, the Ocean Peace employee documents are examined the file data shows that they comments were written by someone else. Susan Robinson is writing comments for everyone.


See evidence on the following pages.

J Gleb letter actually written by Susan Robinson

J Gleb ABM Council letter - Protected View - Word - Saved to this PC

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