

December 1, 2015

North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

RE: Agenda item C-8 Halibut Management Framework

Dear Chairman Hull and Council members:

The Alaska Longline Fishermen's Association, the Alaska Marine Conservation Council, and the Central Bering Sea Fishermen's Association appreciate the opportunity to comment on the draft Halibut Management Framework (Framework). The North Pacific Fishery Management Council (Council) initiated the concept of the Framework during its June meeting in 2015. There, while discussing reductions to Bering Sea/Aleutian Island (BSAI) Prohibited Species Catch (PSC) limits, Council members indicated that those reductions were the first step in an iterative process to reduce halibut bycatch in the BSAI groundfish fisheries. We agree that a more explicit approach to this iterative process is useful. **To that end, as the Council moves forward in packaging the Framework into an effective planning tool, we urge the Council to add the specific objectives discussed in greater detail below.**

As currently constructed, the Framework list seven goals.¹ These goals are important; however, it is absolutely critical for the Framework to guide the Council towards next steps in addressing the commitments made by Council members at the outset of this process (i.e., finding a long-term solution to bycatch in the Bering Sea). To do so, the Framework must include a set of specific objectives that will provide direction and context for future actions. We therefore suggest that the Council add the following objectives, all of which are consistent with the Council's commitment in June and the genesis of the Framework:

1. Achieve a fair and equitable balance between directed halibut users and bycatch users (National Standard 4, 9);
2. Protect and rebuild the halibut stock, with particular attention to preserving the "spawning capital" across a range of abundance levels (National Standard 1, 9);

¹ The introduction of the Framework reads:

The overall goal of this Framework is to [1] identify, define, and track the most important issues/topics/questions necessary to guide the Council's decisions about halibut management, and to [2] inform Council interactions with the IPHC. It also [3] serves as a record or catalog of ongoing Council activities and stakeholder involvement, research and management projects, and the interaction among Council, NFMS management and AFSC, Plan teams, the IPHC, and stakeholders. It would [4] describe what we are doing collectively and how these efforts interact; it would [5] identify areas of uncertainty, misunderstanding and disagreement; it would [6] identify areas where further analysis and research may be warranted; and it would [7] suggest actions and timelines for addressing various aspects of halibut management.

3. Provide for the sustained participation of historic participants and fishery dependent communities (National Standard 8, 9); and
4. Minimize “spill-over effects” (i.e., impacts of one sector on another).

These objectives are both broad enough that they are applicable in both the BSAI and the Gulf of Alaska, yet narrow enough that they provide meaningful direction when the Council is prioritizing research needs or considering a management action. Equally important, these objectives are consistent with the purpose of the Framework, in that they move the Council forward on the iterative process of addressing bycatch management concerns.

We believe the current low levels of halibut abundance juxtaposed with the high exploitation rates on juvenile fish highlight the need for immediate Council action on Bering Sea bycatch. As the Council should now be aware, the only tool available to the International Pacific Halibut Commission to protect the spawning capital is to lower harvest rates in the directed fishery. This tool shifts the conservation burden entirely onto the halibut fishermen and fishery dependent communities. To avoid a future crisis, we ask that the Council use the framework document as a launching pad for immediate and effective action to protect both the halibut stock and the traditional Bering Sea halibut fisheries.

We thank the Council for your attention to this important agenda item. Thank you for your consideration of these comments and look forward to providing additional input during public testimony.

Sincerely,



Executive Director
Alaska Longline Fishermen's Association



Shannon Carroll
Fishery Policy Director
Alaska Marine Conservation Council



Phillip Lestenkof
President
Central Bering Sea Fishermen's Association



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Agenda C8 Halibut Management Framework

1 message

Judy Brakel <judybrakel@gmail.com>

Tue, Dec 1, 2015 at 3:02 PM

To: North Pacific Fishery Management Council <npfmc.comments@noaa.gov>

Priorities re the Halibut Management Framework:

1. Given the high importance of halibut in the Alaska economy, and the much-reduced halibut stocks at present, decreasing halibut bycatch should be of the highest priority.
2. Research on local depletions of halibut, and research on the potential for such depletions given the life history of halibut and the distribution of inshore pressures on halibut stocks should be a high priority. The need for this research is exacerbated by a) the proposal to establish a Recreational Quota entity (RQE) and shift some of the directed catch from the longline fishery to the charter fishery; and b) the continued growth of the "self-guided" fishery in some local areas, a fishery for which available data is of poor quality.

Thank you,

Judy Brakel Box 94, Gustavus, AK 99826 phone [907-697-2287](tel:907-697-2287) email judybrakel@gmail.com



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Halibut Management Framework and Abundance

1 message

Luke Fanning <fanning.luke@gmail.com>

Mon, Nov 30, 2015 at 9:36 PM

To: npfmc.comments@noaa.gov

Dear Council Members,

I am writing to request that the council make immediate and significant cuts to the allowable halibut bycatch in the BSAI. The current halibut biomass is at its lowest levels in recent history. Over the past decade, halibut bycatch has increased to over 60% of total removals. The BSAI bycatch fisheries might be comparable to their historical catch in pounds, but the resource is so much smaller that it represents a dramatic increase in the impact on this fishery.

At present, the IPHC's only tool is a reduction in the directed fishery quota. The net result is that bycatch has received a priority over the directed fisheries. This is unacceptable for both the health of the resource and the equity among fisheries.

Finally, the Bering Sea is a nursery ground, and failing to address halibut bycatch in this area has a dramatic effect on the coastwide halibut ranging from California to the BSAI.

In June, the Council promised that it's stated action was 'just the first step'. Please make good on that promise by making meaningful reductions to the Bering Sea halibut bycatch immediately.

Sincerely,

Luke Fanning

F/V Triton

Juneau, Alaska



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

C8 & C9 comments

2 messages

jeff farvour <jefarv@gmail.com>

Tue, Dec 1, 2015 at 4:45 PM

To: npfmc.comments@noaa.gov

C8 & C9

Dear Chairman Hull and Council Members,

I appreciate the Council stating in June that action taken to reduce Bering Sea halibut bycatch was just a first step as a recognition that more needs to be done to protect the halibut resource.

In the last ten years, BSAI bycatch has increased to the point that it now accounts for 60% of the halibut mortality in that area while the commercial halibut fishery has decreased to about 30% of the removals in that area. This is considerable negative impacts on the historic halibut fisheries and communities that depend on the halibut resource. The Bering Sea is a nursery ground for halibut that grow and migrate out to Gulf of Alaska and beyond so the impacts of this bycatch ripple throughout the same range.

I invested in halibut fishing with the expectation that halibut bycatch would not be prioritized over the historic halibut fishery, yet that is exactly what is happening. Bering Sea halibut bycatch is comprised of an enormous amount of juvenile fish and now comprises approximately the same numbers of halibut that the whole US and Canadian commercial halibut fishery bring to port.

Currently, the burden of conservation is solely on the directed halibut fisheries. The IPHC can only reduce harvest in the directed halibut fisheries to achieve conservation and harvest goals but the Council has the power to reduce bycatch and stop the prioritization of bycatch of the directed halibut fisheries.

Our small boat, coastal fishing communities are depending on the Council to reconcile this sad situation. We need to develop much more careful, responsible ways to manage this magnificent resource.

Sincerely, Jeff Farvour, Sitka AK

"If we are serious about investing in the long term health of our future then we need to commit to long term investments."

NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Tue, Dec 1, 2015 at 4:45 PM

To: jefarv@gmail.com

Thank you for your comment. You may submit your comments for our 2015 December meeting until Tuesday December 1st.



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

COMMENT TO THE COUNCIL on Halibut Management Framework and Abundance Based Management for Halibut Bycatch

2 messages

Rebecca Knight <bknight15@icloud.com>
To: npfmc.comments@noaa.gov

Mon, Nov 30, 2015 at 5:30 PM

Hello Council Members,

During your upcoming deliberations, I request that you please make the halibut resource and directed halibut fisheries the number one priority and take immediate steps to reduce bycatch.

My husband, two adult sons, and I own halibut IFQ 2C-D and fish all of our halibut on a 32 ft vessel. We represent three individual families in Petersburg. Our families directly depend on the health of the fishery for our livelihoods. We are Alaskans.

The overall statistics regarding bycatch mortality, biomass, and related mortality are alarming:

- The current estimated halibut biomass represents the lowest biomass level since 1996 when Congress passed the Sustainable Fisheries Act.
- The current female spawning biomass is about half as large as it was during the 1980's and early 1990's. Over the past decade, bycatch mortality in the BSAI has increased to 60% of total removals while directed fishery landings have decreased to about 30% of removals.
- Bycatch in 4CDE accounts for 87% of total mortality.

As these statistics demonstrate, there remains much work yet to be accomplished to protect the halibut resource, fisheries, and local economies. Moreover, the Council members acknowledged last June, that their initial effort on Bering Sea/Aleutian Islands bycatch was "just the first step." Please keep your word by enacting additional, strong measures to insure the health of the fishery.

The IPHC hands are tied regarding what they can do to offset bycatch impacts. They can only reduce harvest in the directed fisheries to offset bycatch impacts, and by default **bycatch receives priority over the directed fisheries**. Not only is this unsustainable, it is simply unfair and just plain wrong that Bering Sea druggers are allowed to kill so many small halibut - the lifeblood of the fishery. The Bering Sea is the nursery ground for halibut that eventually migrate to all other areas. Bering Sea bycatch hurts the halibut resource and all who depend on that resource including my family and those of my neighbors and friends.

Thank you in advance for doing the right thing - biologically and morally - by reducing BSAI halibut bycatch.

Sincerely,

Rebecca Knight
PO Box 1331
Petersburg, AK 99833

NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>
To: bknight15@icloud.com

Mon, Nov 30, 2015 at 5:31 PM

Thank you for your comment. You may submit your comments for our 2015 December meeting until Tuesday December 1st.



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Halibut Management Framework and Abundance Based Management for Halibut Bycatch

2 messages

Patricia Phillips <pacific@hughes.net>
To: npfmc.comments@noaa.gov

Tue, Dec 1, 2015 at 4:45 PM

More needs to be done to protect the halibut resource, fisheries, and fishing communities.

In June 2015, NPFMC Council action on Bering Sea bycatch was "just the first step."

I am concerned with these facts:

- a. The current estimated halibut biomass represents the lowest biomass level since 1996 when Congress passed the Sustainable Fisheries Act.
- b. The current female spawning biomass is about half as large as it was during the 1980's and early 1990's.
- c. Over the past decade, bycatch mortality in the BSAI has increased to 60% of total removals while directed fishery landings have decreased to about 30% of removals. Bycatch in 4CDE accounts for 87% of total mortality.
- d. At present, the IPHC can only reduce harvest in the directed fisheries to offset bycatch impacts—as a result **bycatch receives priority over the directed fisheries.**
- e. The Bering Sea is the nursery ground for halibut that eventually migrate to all other areas. Bering Sea bycatch hurts the halibut resource and all who depend on that resource.

I ask the Council to make the halibut resource and directed halibut fisheries the PRIORITY and REDUCE BYCATCH.

Thank you,

Patricia Phillips

PO Box 109

Pelican, Alaska 99832

NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>
To: pacific@hughes.net

Tue, Dec 1, 2015 at 4:46 PM

Thank you for your comment. You may submit your comments for our 2015 December meeting until Tuesday December 1st.



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

halibut management framework and abundance based management for halibut bycatch

1 message

Marty Remund <remundmarty@yahoo.com>

Tue, Dec 1, 2015 at 6:27 AM

Reply-To: Marty Remund <remundmarty@yahoo.com>

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I'm reminding the council that council members said their action on Bering Sea bycatch at the June 2015 meeting was "was just the first step". Here are some of my concerns with the high trawl bycatch of halibut. 1. The current estimated halibut biomass represents the lowest biomass level since 1996 when Congress passed the Sustainable Fisheries Act. 2. The current female spawning biomass is about half as large as it was during the 1980's and early 1990's. 3. Over the past decade, bycatch mortality in the BSAI has increased to 60% of the total removals while directed fishery landings have decreased to about 30% of removals. Bycatch in 4CDE accounts for 87% of total mortality. 4. At present the IPHC can only reduce harvest in the directed fisheries to offset bycatch impacts. As a result, bycatch receives priority over the directed fisheries. 5. The Bering Sea is the nursery ground for halibut that migrate to all other areas. Bering Sea bycatch hurts the halibut resource, and all who depend on that resource! I'M ASKING THE COUNCIL TO MAKE THE HALIBUT RESOURCE AND DIRECTED HALIBUT FISHERIES THE PRIORITY AND REDUCE BYCATCH. THANKS, SINCERELY, Marty Remund Port Alexander, Alaska