



Alaska Longline

FISHERMEN'S ASSOCIATION

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North Pacific Fishery Management Council
1007 West Third, Ste. 400
Anchorage AK
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September 25, 2021

Dear Chairman Kinneen,

I am submitting these comments on **Agenda Item C-4: Pacific Cod Trawl Cooperative (PCTC) Catch Share** program for trawl vessels in the Bering Sea/Aleutian Islands on behalf of the Alaska Longline Fishermen's Association (ALFA).

ALFA has only a few members who participate in the BSAI cod fishery; however, most of our members depend on the halibut resource and strongly support measures contained in this action that reduce bycatch and minimize habitat disruption. While we are not taking a position on the action as a whole, we offer these recommendations on key elements along with our supporting rationale.

Element 2: Allocation to LLP licenses

Consistent with our bycatch and gear conversion recommendations below, ALFA supports leaving the C season quota unallocated. Historically the trawl sector has not harvested this quota and it has instead been made available to other sectors, including the pot gear sector. Continuing this practice will minimize impacts of this action on other sectors and prevent the bycatch increase associated with trawl harvest of C season quota.

Element 3: Prohibited Species Catch Limits (Bycatch Reduction)

ALFA supports a 35% reduction in the halibut bycatch allocated to this fishery. Rationalizing the cod fishery is the Council's opportunity to reduce bycatch, build a measure of climate resilience into the management plan, and support Alaska's historic directed fisheries and fishing communities. The reduction in halibut bycatch will support all who depend on the halibut fishery for subsistence, sport and commercial harvest, as well as the fishing communities in which the harvesters/processors reside. The fleet achieved a 63% halibut bycatch reduction in 2020 and an 83% reduction in 2021 when operating under a voluntary cooperative harvest plan, establishing that bycatch can be "practicably" reduced by at least 35%--and should be to comply with National Standard 9. The halibut bycatch reduction may have ancillary benefits for struggling crab stocks and the Bering Sea communities hard hit by the cataclysmic decline in crab stocks. Thousands of families,

businesses and communities depend on the health of halibut and crab. We STRONGLY support a halibut bycatch reduction of at least 35%.

Element 6: Aleutian Island Processor Provisions

ALFA supports including provisions for Aleutian Islands harvesting and processing that results in meaningful processing capacity in the Aleutian Islands. Alaska's coastal communities are struggling to remain viable as climate change destabilizes fisheries. National Standard 8 directs the Council to provide for the sustained participation of fishery dependent communities. Provisions that promote sustained participation are consistent with MSA directives and the current Administration's commitment to social justice. Existing data also indicates that halibut bycatch rates are lower in the Aleutians, again providing benefits to the resource and halibut fishery.

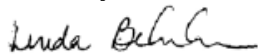
Element 14: Gear Conversion

ALFA strongly supports allowing the use of pot gear to catch the harvest cooperative quota. The conversion element meets the purpose and need statement driving the action and provides flexibility in a changing ocean climate. Pots have lower halibut bycatch, less impact on habitat, and a lower carbon footprint.

In closing, halibut fishermen have heard for years that rationalization is essential to bycatch reductions. ALFA maintains that bycatch reductions should also be essential and pre-requisite to rationalization. Please adhere to National Standards 8 and 9 by reducing bycatch and providing for the sustained participation of Alaska's fishery dependent communities.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
(Executive Director, ALFA)