



December 1, 2023

Ms. Angel Drobnica, Chair  
North Pacific Fishery Management Council  
1007 West Third, Suite 400  
Anchorage, AK 99501-2252

Mr. John Kurland, Regional Administrator .  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

**Re: Agenda Item C3/C4 BSAI/GOA Groundfish Specifications**

Dear Ms. Drobnica, Mr. Kurland, and Council members;

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska’s marine ecosystems and the vibrant fishery-dependent communities they sustain. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems.

Regarding agenda item BSAI/GOA Groundfish– Specifications, **AMCC underscores two primary considerations for the Council and its advisory bodies: first, that urgent action be taken to address the accuracy of Discard Mortality Rates (DMRs) for halibut; and second, that setting the Total Allowable Catch (TAC) level for each single species be done with broader considerations of ecosystem impacts.**

We are deeply concerned, in light of recent reports of increased interactions between whales and trawl vessels operating in the Bering Sea, that DMRs are not effectively capturing halibut mortality. Notes from the recent Joint Meeting of the Groundfish Plan Teams on Halibut DMR indicates that “when marine mammals are reported as feeding on discards, the condition is reported as unknown<sup>1</sup>”. Accurate accounting of fishing-related mortality is undoubtedly essential for sustainable fisheries, and this omission of known mortality events is glaring. The absence of accurate DMR assessments needs to be addressed. We question the assumption that halibut DMRs are being reduced, as well as the accuracy of observer reports which appear to indicate decreased instances of the presence of marine mammals. The ten orcas captured in trawl nets so far in 2023 indicate an increased trend of depredation, evidenced by increasingly

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<sup>1</sup> [NPFMC Joint Meeting of the Groundfish Plan Teams September 2023](#)



high-risk behaviors. Per local knowledge holders, fish-eating resident orcas near operating trawl vessels are known to feed on discards with an observed preference for halibut.

Every action has a chain reaction that ripples through habitats, food webs and human communities - all critical aspects of ecosystem health. Prohibited Species Catch (PSC) is one important indicator of ecosystem impacts from fishing effort. At the end of this letter, you will find a TAC sheet that includes the 2022 reported PSC associated with each target species.

When considering this aspect of anthropogenic drivers of ecosystem change, it is important to note that PSC should not be reviewed solely as a percentage of target-species TAC or harvest. Salmon provides a helpful example. There are times within reporting and analysis that salmon PSC numbers are presented as — x salmon per x metric tons of pollock. While this may be technically correct, the provision of these numbers as a comparison does not provide accurate or appropriate context within which to view that PSC number as an EBFM indicator. The significance of each salmon, versus each pollock, are measured by two very different rubrics. In this and most cases, pollock is measured as metric tons of marketable food protein. Salmon, on the other hand, should be viewed in the context of food sovereignty and brood capacity. That is particularly true at times when salmon conservation is urgently focused on the number of fish returning to rebuild struggling runs, as it is now. Without appropriate context, we are left with an incomplete and possibly distorted view of the impact of individual fish taken as PSC. When considering salmon PSC as an ecosystem factor in setting TAC levels, we need to appropriately identify and weigh the relevance of those salmon to critical conservation needs.

The current state of the Bering Sea ecosystem is deeply alarming. The culprits of change are multifaceted and interconnected; however, options for meaningful action do exist and are within the authority of this regulatory body. While we must acknowledge the role that climate change is playing in making the status quo unsustainable, there is no lever we can pull as a management body to change that. We can assess the ecosystem-wide impact of fisheries management decisions, and take iterative steps to mitigate those impacts. The definition of what is sustainable has to evolve. We agree with a recent statement by the Commissioner of the Alaska Department of Fish and Game Doug Vincent-Lang that when it comes to protecting our fisheries we should act with integrity in upholding our own standards, even when doing so means missing out on profits.<sup>2</sup> **We ask that the Council consider reductions to the overall TAC**

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<sup>2</sup> National Fisherman Fall 2023. No. 03 Vol 104. "Data-driven fisheries management for future generations" by Douglas Vincent-Lang.



**as a means of achieving critical conservation of at-risk species and habitat, contributing to overall biodiversity and ecosystem integrity.**

We support the North Pacific Council's mission to prevent, mitigate, or minimize any adverse effects from fishing to the extent practicable, if there is evidence that a fishing activity adversely affects a stock in a manner that is "more than minimal and not temporary in nature." To that end, continuous review of current or future fishing impacts on stock health, and comprehensive ecological analysis to support responsible decision-making, is critical to the conservation of our marine resources and ecosystem health.

Thank you for considering our comments.

Respectfully,

Respectfully,

A handwritten signature in black ink, appearing to read "Marissa Wilson", with a long horizontal flourish extending to the right.

Marissa Wisniewski (Wilson)  
Executive Director



## 2022 Reported BSAI Prohibited Species Catch by Target Species

Species	2022		Prohibited Species Catch							
	TAC <sup>1</sup>	Catch <sup>1</sup>	Chinook <sup>2</sup>	Non-Chinook <sup>2</sup>	Halibut <sup>1</sup>	Herring <sup>1</sup>	Red King Crab <sup>2</sup>	Golden RKC <sup>2</sup>	Bairdi Tanner <sup>2</sup>	Opilio Tanner <sup>2</sup>
Pollock	1,130,250	1,108,744	6,415	242,375	158	1,708	311	165	4,758	1,952
Pacific cod	150,262	126,918	269	109	370	-	150,705	3,470	118,441	69,928
Sablefish	11,727	7,739	-	-	9	-	2	10,960	1,371	1,891
Yellowfin sole	250,000	154,255	77	210	1,094	22	7,926	-	354,631	175,891
Greenland turbot	6,572	1,479	-	-	13	-	-	876	-	-
Arrowtooth flounder	20,000	7,857	-	131	23	-	-	414	12,676	126
Kamchatka flounder	9,214	8,370	-	71	48	-	-	3,014	128	-
Northern rock sole	66,000	18,399	-	-	150	13	267	-	24,159	6,926
Flathead sole	35,500	14,690	181	169	212	5	97	1,936	38,039	18,938
Alaska plaice	29,221	11,252	-	-	-	-	-	-	-	-
Other flatfish	10,000	2,560	-	-	5	-	-	808	118	-
Pacific Ocean perch	35,385	34,781	-	-	-	-	-	-	-	-
Northern rockfish	17,000	7,898	208	950	56	2	-	3,325	704	142
Blackspotted/Rougheye Rockfish	503	454								
Shortraker rockfish	541	285								
Other rockfish	1,144	1,309								
Atka mackerel	66,481	58,108	1,192	1,255	104	-	-	1,728	-	-
Skates	30,000	29,278								
Sharks	500	126								
Octopuses	700	250								
<b>Total</b>	<b>1,871,000</b>	<b>1,594,752</b>	<b>8,342</b>	<b>245,270</b>	<b>2,242</b>	<b>1,750</b>	<b>159,308</b>	<b>26,696</b>	<b>555,025</b>	<b>275,794</b>

<sup>1</sup> Reported in Metric Tons

<sup>2</sup> Reported in Number of Animals

Data for TAC/Quota/Catch from [https://www.fisheries.noaa.gov/sites/default/files/akro/car110\\_bsai\\_with\\_cdq2022.html](https://www.fisheries.noaa.gov/sites/default/files/akro/car110_bsai_with_cdq2022.html)

Prohibited Species Catch data from NOAA\* Some gear types are exempt from PSC limits