

**Subject:** Alaska Halibut fishing  
**From:** garykrosch@aol.com  
**Date:** 1/21/2015 3:25 PM  
**To:** npfmc.comments@noaa.gov

Hello - Thank you for requesting comments. I have been coming to Alaska to fish for two weeks every summer for the past 31 years, usually bringing along one or more guests. We spend about \$5 - 6 thousand per person on these visits. The new sport fishing Halibut limits we encountered last year were troubling, because each charter turned into a contest to see who could catch the biggest small size allotment fish. It took much of the fun out of each day and quite frankly, denied us from keeping enough fish to justify the cost of the charter. Historically I would aspire to keep two fish weighing around 40 pounds. I've caught many Halibut over 100 pounds and one over 200 pounds, but have been releasing those guys for many years.

In my estimation, it is not the sport fishermen who are responsible for any diminishing population of Halibut in the Cook Inlet fishery. We hope that you will consider changes in the current regulations.

Best regards,

Gary Krosch  
15 Southmoor Dr.  
St. Louis, MO 63105  
314-466-4078 w

**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** i ian <ian.ivanoff@gmail.com>  
**Date:** 1/21/2015 3:35 PM  
**To:** npfmc.comments@noaa.gov

NPFMC,

I support a proactive approach to addressing the halibut situation in the Bering Sea. Bycatch limits in the trawl fisheries should reflect the halibut population, and be brought down when the halibut bio mass is stressed. The trawl fleet has had ample time to adjust thier fishing practices to avoid halibut. The council should demonstrate some leadership, and force the trawl fleet to conform to sustainable fishing practices.

Ian Ivanoff  
Halibut IFQ Holder  
January 21, 2015

**Subject:** agenda item: C-5 Bering Sea Halibut PSC  
**From:** Joseph D'Arienzo <delsenzo@live.com>  
**Date:** 1/21/2015 5:40 PM  
**To:** "." <npfmc.comments@noaa.gov>

NPFMC.

My name is Joe D'Arienzo. I live in Sitka, Alaska and have Halibut IFQ.

I would encourage the council to lower by-catch in this sector beyond the 35% option , to 50%. Current models show juvenile halibut in this area populate Southeast Alaska.( Which, in my opinion, is a no brainer. Of course these fish move around!) The directed halibut fishery in this area is in drastic decline, largely due to bycatch. A 50% reduction would be a first step in the recovery of the halibut fishery in this area and protect the fishery here in Southeast.

Thank You

Joe D'Arienzo

**Subject:** Halibut bycatch

**From:** Jim Steffen <1norcoast@gmail.com>

**Date:** 1/21/2015 7:31 PM

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

If I can assume that the Hal bycatch is primarily due to trawling, and understanding what a dirty fishery that is, it is pretty obvious that the trawl by-catch of halibut must be significantly reduced. I don't care how this affects the trawl bottom line, because that fishery, if allowed to proceed unabated will destroy all other fisheries as we saw on the east coast.

Jim Steffen

38 years in Alaska marine industry

**Subject:** Agenda item C-5 Bering Sea halibut PSC  
**From:** "Greg Demers" <gdemers@horizonsatellite.com>  
**Date:** 1/21/2015 7:46 PM  
**To:** <npfmc.comments@noaa.gov>

I am writing to encourage substancial reductions in the allowed halibut bycatch by the Bering Sea trawl fleet. The destruction and wanton waste of this precious resource must end NOW !

Sincerely,

Greg and Carole Demers  
Homer, Alaska

**Subject:** Halibut bycatch  
**From:** Jill Wittenbrader <jillwitt@gmail.com>  
**Date:** 1/22/2015 4:20 AM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Sir or Madam,

I am extremely concerned about the amount of halibut bycatch, it's simply outrageous and crazy that 92% of halibut taken in the central Bering Sea is bycatch!! This means that for every ONE halibut caught in by the directed fishery, THIRTEEN WILL BE WASTED AS BYCATCH! This is Cleary no way to mange our precious fisheries resources. Please address this matter in a significant and effective manner as soon as possible.

Sincerely,

Jill Wittenbrader  
506 Marine Way  
Kodiak, Alaska 99615

Sent from my iPad

**Subject:** Stop Bycatch Waste

**From:** Guy Lopez <guyslopez@aol.com>

**Date:** 1/22/2015 7:05 AM

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

Dear Sir or Madam,

Under all circumstances, the waste of halibut and other bycatch must stop. Be forward thinking and implement the solutions necessary to achieve this absolutely necessary goal. Thank you.

Sincerely,  
Guy Lopez

**Subject:** Re: Agenda item C-5 Bering Sea Halibut PSC  
**From:** "Fred Sargent" <bigbay@acsalaska.net>  
**Date:** 1/22/2015 9:43 AM  
**To:** <npfmc.comments@noaa.gov>

January 22, 2015

Re: Agenda item C-5 Bering Sea Halibut PSC

Council Members,

The recent news concerning bycatch in halibut area 4CDE is outrageous. And the waste of valuable halibut is certainly not limited to that area. It's time to talk about the elephant in the room. The only way to satisfy the big ocean harvesters without putting smaller coastal fisherman out of business completely is to utilize the lucrative halibut bycatch to compensate halibut long-liners and in the process reduce the total amount of halibut coming over the rail to die.

I understand the IPHC has a problem with halibut being harvested with anything but long-line gear, I think they're going to need to get past that in order to truly preserve the fishery. It's obvious the trawlers and other big volume harvesters aren't going anywhere soon. It seems to me, that if the bycatch value could be utilized sanely, the problems could be solved for most of the user groups. Throwing millions of dollars' worth of fresh dead halibut over the side every year is ludicrous and needs to stop!

Fredrick N Sargent  
3177 Woody Way Loop  
Kodiak, AK 99615  
[bigbay@acsalaska.net](mailto:bigbay@acsalaska.net)

907-478-8285

Area 3A quota share holder  
Area K Alaskan salmon fisherman



**Subject:** ID:C5 Bering Sea Halibut PSC  
**From:** Amy Schaub <schaub360@gmail.com>  
**Date:** 1/22/2015 10:58 AM  
**To:** npfmc.comments@noaa.gov

ATTN: C5 Bering Sea Halibut PSC

Dear council,

I am a young commercial fisherman. I look to the future in the hopes that my livelihood will sustain me, my community and the generations to come. I write to you to take action in reducing halibut bycatch in the Bering Sea.

As a consumer of halibut and commercial halibut fisherman I strongly support IMMEDIATE ACTION to REDUCE HALIBUT BYCATCH (halibut PSC) in the Bering Sea by at least 50 percent. Bering Sea halibut fisheries are facing a crisis. The harvest levels recommended by the International Pacific Halibut Commission (IPHC) for 2015 would reduce catch limits for areas 4CDE by 71 percent from 2014 levels. Harvests in the directed halibut fisheries in this region dropped by 69 percent from 2007-2013. At the same time, halibut bycatch limits have remained virtually unchanged at more than 7 million pounds.

In 2015, if the IPHC's recommended harvest limits for Area 4CDE are adopted, this means that 92 percent of the total halibut harvest will be allocated as bycatch, with only a tiny 8 percent leftover for the directed fisheries, for anyone who fishes halibut. Imagine having a holiday dinner and sharing with your friends, family and neighbors. Then imagine throwing 92 percent of that away and then splitting the remaining 8 percent to feed your family, community and those that are dependent on that meal. This 8 percent left for dedicated fisheries is an incredibly small amount left for anyone who fishes or enjoys halibut.

The Magnuson-Stevens Act requires, under National Standard 9, that bycatch be reduced. National Standard 8 requires councils provide for the sustained participation of fishery dependent communities, but unless the council acts now, Bering Sea communities will be cut off from this historic fishery while trawlers are allowed to continue killing halibut in the very same area.

Communities who depend on the halibut resource, and the resource itself, do not have the

luxury of waiting for reductions in bycatch to be made eventually: bycatch reductions must be made now. The halibut bycatch in the Bering Sea must be reduced comparable to the reductions to the directed fisheries. Halibut bycatch should be reduced by no less than 50 percent. I strongly support, on behalf of all those who consume or fish halibut, that immediate action be taken to reduce halibut bycatch.

Sincerely,

Amy Schaub

Commercial Fisherman

Member of United Fishermen of Alaska

Member of Alaska Marine Conservation Council

**Subject:** By catch

**From:** Ron Conatser <ronconatser@gmail.com>

**Date:** 1/22/2015 3:02 PM

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

I am a Commerical fisherman of 43 yrs and as regards to the Berring Sea halibut You  
People Should Be ashamed

I can't help but think you are all in the draggers back pocket what a joke

I don't know why I send in my comments just a wast of time

Ron Conatser

F/V Ida Lee

Sent from my iPhone

**Subject:** Bering Sea Bycatch Comments  
**From:** Russell Thomas <russellt@aseresorts.com>  
**Date:** 1/22/2015 5:57 PM  
**To:** npfmc.comments@noaa.gov

To Whom It May Concern:

My family owns and operates three fishing lodges in the Ketchikan area. As you are aware, area 2C has been hit with dramatic halibut catch reductions for both sport and commercial halibut fishermen in our area.

In recent years it has been determined that halibut are more migratory than originally thought, therefore halibut resource problems created in one area has dramatic impacts on the stocks in adjacent areas. In short, bycatch in the Bering Sea is having an impact on directed fisheries in the Bering Sea, as well as areas 3A & 2C.

As fishermen we all recognize that bycatch can never be completely eliminated. That being said, efforts need to be taken to curtail bycatch as much as possible. These efforts might include moving directed fisheries away from high bycatch areas, requiring different gear be used in a directed fishery to reduce or eliminate bycatch, and monetarily penalizing bad actors who refuse to make efforts to reduce bycatch.

It seems absurd that over 90% of the 4CDE catch of halibut will be allocated as bycatch under proposed IPHC recommendations for 2015. As IFQ holders in the directed fishery continue to have their quota reduced to protect the resource, the fact that halibut bycatch limits have stayed virtually unchanged seems like the IFQ holders are being unfairly punished for a problem created by a different user group.

Please make changes to bycatch limits consistent with the reduction directed fishermen have taken in their catch since 2007. When the resource is in crisis, all users need to be an active part of the solution.

Sincerely,

Russell Thomas  
Alaska Sportfishing Expeditions  
General Manager

**Subject:** C-5 Bering Sea Halibut PSC  
**From:** Luke Fanning <fanning.luke@gmail.com>  
**Date:** 1/22/2015 9:12 PM  
**To:** npfmc.comments@noaa.gov

Dear NPFMC Council Members,

I am a commercial and sport halibut fisherman in Southeast Alaska. Despite massive reductions in the halibut biomass and the directed fishery, bycatch limits for the trawl and amendment 80 fleets remain largely unchanged. The directed longline and charter fisheries have been reduced to a mere fraction of their historical harvest, while the amount of bycatch (as a percentage of the total removals) has skyrocketed. The 'voluntary' reductions touted by the at-sea processors reflect a net increase in bycatch when considered as a percentage of the total biomass.

Calls for more research, conversations, brainstorming and other "toothless" measures have failed to protect the resource and the fishery, and the directed fishery is now facing virtual closure in these areas as a direct consequence of bycatch. This fleet is slated to take more than 90% of the removals in the Bering Sea. ***It is time for the biggest player in the game to share in the burden of halibut conservation.***

***Please vote to immediately reduce BSAI bycatch limits by 35% (or more).*** This is a very small cut in relation to what the directed fishery has had to endure. The fleet will find a way to reduce bycatch if they have an incentive--just like the Canadians did.

Sincerely,

Luke Fanning

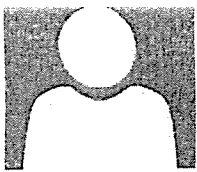
Juneau, Alaska

**Subject:** item c-5 bsai halibut psc  
**From:** Lorraine Kirk <lrne@sbcglobal.net>  
**Date:** 1/23/2015 7:13 AM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

You as a voting council have the responsibility to set bycatch limits, the halibut resource is at a critical stage and needs all the help it can get, the sport and commercial sectors have taken huge reductions in quota to help stop this, its not enough, the draggers have done nothing to address this problem exopt lobby for no reduction or they will lose millions, well its way past time for the dragger sector to help stop this, we as sport and commercial fishers have lost millions, and really at this point its not a matter of loosing money its the matter of loosing a resource for the future, the magneson stevens act states in there somewhere to manage for the resource first, please show some support for the halibut resource and start rebuilding the halibut biomass by voteing for a 50% reduction in the gulf and bsai halibut bycatch limits.

thanks for listening,

george kirk fvphantom2@gmail.com



From: [carenichols@hotmail.com](mailto:carenichols@hotmail.com)

Sent: Sun 1/25/15 9:50 AM

To: linda behnken ([alfafish@acsalaska.net](mailto:alfafish@acsalaska.net))

*Heh Linda - Too rude?? LEt me know and I can change it- have notsent to council yet.*

I have been a commercial halibut fisher for 30 years. I have also been a subsistence and sport fisher for over 30 years.

I strongly urge the IMMEDIATE action to reduce halibut bycatch in the Bering Sea by at least 50%. More would be better!!!

The IPHC has recommended harvest levels in areas 4CDE for 2015 that are REDUCED 71% from 2014!!! Yet the Halibut bycatch limits for the Bering Sea Trawl Fishery have remained the same. This means 92% of the recommended harvest for area 4CDE will go to bycatch.

The Magunson-Stevens Act requires under National Standard 9 that the bycatch be reduced.

So what is the Council doing- so far nothing. Why??

IThe Council seems reluctant to do anything but eliminate a historic fishery that many communities are

dependent on in favor of wanton wastage of this fish stock. It is understood thru studies that these fish migrate west to east. So in reality the Bering Sea bycatch is affecting the entire halibut fishery.

If the Council does not do something to control the Trawl fleet bycatch that is definite and for real and NOW than one would think the Council is in the wrong and ought to be looked into as to just why they would think that waste of a huge amount of fish is acceptable.

I know there is lots of political pressure to let the big boys keep fishing but to do so is going to be the ruin of the halibut stocks and fishery. This is totally unacceptable and just plain wrong!!

So Please reduce the Bering Sea Trawl bycatch of halibut by no less than 50 % IMMEDIATELY. And then go forth from there in finding ways to reduce it further!! Do not allow political pressure and back door dealings to sway you on this as the decimation of a fish stock is at stake and you can do something about it. Just have the guts to do it. You know its the right thing to do and that there is no excuse not to.

Thank You

Carolyn Nichols

111 Knutson Drive

Sitka, AK 99835

**Subject:** This B.S.

**From:** Goetz Tessmer <goetz.tessmer@gmail.com>

**Date:** 1/23/2015 9:42 AM

**To:** npfmc.comments@noaa.gov

Can someone please explain to me why this is taking place in Seattle and not here in alaska?  
After all , it is about ALASKAS fishery.



**Subject:** BYC 15-001 Halibut Bycatch in the Bering Sea  
**From:** Mark Reed <markfromsea@frontier.com>  
**Date:** 1/23/2015 12:17 PM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Mark Reed  
Sport Fisherman in WA, occasional boat work in AK  
Western Pioneer, Icicle Seafoods, Trident Seafoods, Crowley, others  
8011 NE 128 Street  
Kirkland, Wa  
98034

I've pondered the questions surrounding by catch for decades. It's always made me sick to see so much waste but I haven't researched by catch options other than verbal chit chat with coworkers, all of us at low level positions supporting some fisheries. So, I have NO working knowledge of the administering of by catch limits and formulas.

I've often thought if certain fisheries and appropriate vessel types were switched over to a multiplier quota instead of these straight tonnage quotas for specific fisheries that the by catch could be brought to near zero. How's that you say? Honestly, I have no idea if this has been looked into by the powers in charge or if it is even feasible. Maybe it just isn't feasible to catch and process that many species of fish on the same vessel. Generally, great pains are taken to change the processor line equipment in between species seasons.

So, hypothetically, this is how an imaginary zero by catch multiplier quota system possibly could work.

1. Take the current catch quotas that each existing vessel/company has, convert it to a new all species quota designated to that vessel/company.
2. Apply multiplying factors to each species. Theoretical examples: Halibut = 4x, cod = 2x, various other species = 3x to 1x.
3. As each vessel/company catches their allotted new multiplier quota they can, even be required to, keep nearly all species that they catch. Here's the key, if they catch 4,000 lbs of halibut with a 4x rating, it counts as 16,000 pounds against their allotted quota. If they catch 10,000 lbs of 2x cod, it counts as 20,000 pounds against their allotted quota, so on and so on. Each vessel/company fishes for the year/season until they fill their multiplier quota then they are done for the season/year.
4. The fishery managers and bio guys simply manipulate the multiplier factors up or down of each species to encourage harvest of specific species and avoid others. They can even break it down, the multiplying factors, to specific areas and times of the year.

If it could only be done correctly and effectively to the larger vessels and companies, that should leave healthier quotas or available fish for small family run vessels and us sportees.

Maybe they already have something like that, I have no idea, it seems like they do not. This is just an idea that's been bouncing around in my gray matter for the last 20 years. I'd love to hear from the

guys in the know if something like that has been considered or if it's just a shitty idea. No offense taken!

**Subject:** Halibut by catch  
**From:** Jane Miles <janeflyfish@gmail.com>  
**Date:** 1/24/2015 10:16 AM  
**To:** npfmc.comments@noaa.gov

My name is Jane Miles. My mailing address is po box 2508 Homer Alaska 99603. I wish to speak to : Agenda item C-5 Bering Sea Halibut PSC. I fish for personal use halibut and salmon in the Kachemak Bay area and belong to various conservation groups.

I strongly believe there is a need to reduce halibut bycatch by the trawlers in the Bering Sea. 7 million pounds is too much. I support a 50 % reduction of halibut bycatch. Anything less than this is not an adequate division of the resource nor is it fair to the small boat operators and the communities they support.

Thank you for your time and consideration of my input. Jane Miles

**Subject:** Bering Sea halibut bycatch 13:1  
**From:** "kaleilw ." <kalei.lw@gmail.com>  
**Date:** 1/24/2015 5:40 PM  
**To:** npfmc.comments@noaa.gov

Please accept my comments for the halibut bycatch. A ratio for bycatch to fishery of 13:1 is not the way to balance the needs of the directed fishery and those of the fisheries who catch halibut as bycatch. I support reductions in the bycatch caps of at least 50%.

--

Lynn Wilbur, B.S., PGDipSci, PhD candidate University of Aberdeen  
617 Katlian St., Sitka AK  
(907) 752-0011

**Subject:** BYC 15-001 Halibut Bycatch in the Bering Sea  
**From:** Brian Bordeau <bbordeau@gmail.com>  
**Date:** 1/25/2015 9:39 AM  
**To:** npfmc.comments@noaa.gov

I was recently informed of the staggering rate of halibut bycatch in Alaska and urge the North Pacific Fishery Council to come up with a plan to aggressively reduce the number. Given the scientific data that demonstrate the migratory patterns of the Pacific Halibut, bycatch in the Alaska fishery has negative consequences to our opportunities here in Washington.

I am no expert in the realm of commercial fishing nor fisheries biology so I cannot provide any recommendations on specifically what should be done here. That said, I read recently that 93% of Bristol Bay Pacific Halibut are caught as bycatch and disposed of as waste. I find this alarming and an unacceptable situation that requires your immediate attention.

Please take the time to consider this issue and create a solution for halibut bycatch reduction.

Thanks  
Brian

Brian Bordeau  
Sport Fisherman in Washington State  
15110 216th AVE NE  
Woodinville WA 98077

**Subject:** Concerning BYC-001, from Jaime Roth, fisherman and concerned citizen  
**From:** Jaime Roth <waterfal29@gmail.com>  
**Date:** 1/25/2015 9:52 AM  
**To:** npfmc.comments@noaa.gov

Dear Council Members,

I am writing to express my opinion that action should be taken to reduce halibut by-catch in the Bering Sea by at least 50%. My husband and I are currently salmon seiners around Kodiak Island, but we were previously halibut fishermen in Cook Inlet, and tender-owner and operators in Bristol Bay. We also consume halibut on a monthly basis, and we are concerned citizens.

If the Bering Sea catch limits for halibut are being reduced, and they have been for some time, it is only logical that halibut by-catch for ground fisheries be reduced as well.

We are confident the Council will take the appropriate action necessary to ensure that the Alaskan people can continue to depend on the halibut fishery in Area 4CDE to supply consistent jobs and food.

Sincerely,  
Jaime Roth

**Subject:** Halibut bycatch Agenda item C-5 B Sea Halibut PSC

**From:** Christopher White <chriswht50@gmail.com>

**Date:** 1/26/2015 10:27 AM

**To:** npfmc.comments@noaa.gov

Dear NPFMC—

As a stake holder in the IFQ, I urge you to take decisive action on the halibut bycatch issue—  
Agenda item C-5 Bering Sea Halibut PSC. Please consider a 50% reduction in the by catch.

It is very wrong that we, the shareholders in the halibut fishery, should have to shoulder the  
continuing reduction in TAC while the trawl fleet bycatch remains unchanged!

Thank you.

Chris White  
F/V Vulcan

**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** Bob Shavelson <bob@inletkeeper.org>  
**Date:** 1/26/2015 3:39 PM  
**To:** npfmc.comments@noaa.gov

Please stop the horrendous halibut bycatch in the Bering Sea - it's long overdue and flies in the face of the Magnuson-Stevens Act.

Bob Shavelson  
Cook Inletkeeper  
P.O. Box 3269  
3734 Ben Walters Lane  
Homer, AK 99603  
p. 907.235.4068 x22  
f. 907.235.4069  
c.907.299.3277  
skype: inletkeeper  
[bob@inletkeeper.org](mailto:bob@inletkeeper.org)

## Lovalaska

Pick.Click.Give.

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**Subject:** Bering Sea halibut bycatch  
**From:** "Rob Lund" <summersong@alaska.net>  
**Date:** 1/26/2015 4:39 PM  
**To:** <npfmc.comments@noaa.gov>

**"Re: Agenda item C-5 Bering Sea Halibut PSC**

**Please reduce the Bering Sea halibut bycatch by more than 50%.**

**Thank you.**

**Robin Lund  
Homer, Alaska  
No affiliation  
Jan. 26, 2015**

**Subject:** C-5 Bering Sea Halibut PSC"  
**From:** Diane Okonek <dcokonek@gmail.com>  
**Date:** 1/26/2015 5:37 PM  
**To:** npfmc.comments@noaa.gov

This is a public comment concerning the agenda item C-5 Bering Sea Halibut PSC. I am an Alaskan resident, Diane Calamar Okonek, from Talkeetna. I have no official affiliation but I care about our fishery resource. I support limiting bycatch of non target species to the lowest number possible. We must protect our fisheries with long term management as a goal and if there is no way to minimize bycatch then we need to change the regulations and stop fishing until we have a way to accomplish this goal. This waste is wrong and I support taking any measures needed to stop it. The entire ocean complex is under stress and I support any actions that will protect and support the ecosystem.

Thank you for your work,

Diane Calamar Okonek  
[dcokonek@gmail.com](mailto:dcokonek@gmail.com)  
P.O. Box 583  
Talkeetna, Alaska  
99676

**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** Brian Okonek <okonek@mtaonline.net>  
**Date:** 1/26/2015 5:54 PM  
**To:** npfmc.comments@noaa.gov

Jan. 26, 2015

From:  
Brian Okonek  
P.O.Box 583  
Talkeetna, AK 99676

To: North Pacific Fishery Management Council

Ref: Agenda item C-5 Bering Sea Halibut PSC

Dear NPFM Council members;

I am not affiliated with any associations, but I am a long time Alaska resident that is concerned with the long term sustainability of the fisheries for the health of the oceans diversity and Alaska's commercial fishermen. The halibut by catch in the Bering Sea must be reduced. It makes no sense to waste such a remarkable resource to the detriment of fishermen who's lively hood is in jeopardy and at risk of destroying the halibut stock. Reductions in the by catch of at least 50% should be taken.

Sincerely,

Brian Okonek

**Subject:** public comments. Bycatch  
**From:** Barbara B <inletcharters@gmail.com>  
**Date:** 1/26/2015 6:34 PM  
**To:** npfmc.comments@noaa.gov

**It is time to reduce BYCATCH! This NPFMC will be known for destroying the halibut and King salmon resource in the most abundant ocean habitat remaining in the world. Commercial and guided sport fishermen have had their share of the catch reduced dramatically in the past five to ten years to levels that put mom and pop businesses at an almost no win situation while the trawl bycatch has remained excessive for years. The guided sport fishermen in area 3A took a 40% reduction in catch in one year without regard for guide business survival. Its time to do the same for the trawl fishermen. Remember, this council will be blamed for the injustice of allocation and the total disregard for natural resource sustainability. It is time to do the right thing! It is time to reduce BYCATCH!**

**Gary Ault**

--

Inlet Charters Across Alaska Adventures  
(800) 770-6126  
(907) 235-6126

**Subject:** Re: Agenda item C-5 Bering Sea Halibut PSC"  
**From:** Timothy Berg <timmyberg@yahoo.com>  
**Date:** 1/26/2015 7:00 PM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Sir:

It is absolutely clear that the "Bycatch" taken by the Trawl Fleet is a significant part of the current downtrend in halibut biomass populations.

Using the most recent data provided by the International Halibut Commission which indicates that four times as many pounds of halibut are caught by the Trawl Fleet each year than the entire sportfishing community harvests is clear evidence that the BYCATCH must be reduced.

The "Trawl Fleet ByCatch" certainly should be considered as part of the larger Commercial Sector Catch. Why this is not happening is not clear, other than it appears that the system is broken.

Putting more restrictions on anglers is ridiculous, and as you well know, completely unfair.

The size of the vessels and the gear being currently used in the Trawl Fleet, is not the same gear that was used 15 years ago. Because the vessels and the nets have increased in size dramatically, so has the catch and the corresponding "ByCatch".

Please put in place severe restrictions on the Trawl Fleet at once. Once they exceed their quota, shut them down. It's only fair to the resource.

I have been involved in the commercial halibut industry for 37 years, and what is being allowed to take place is just terrible. Leave the local Alaska's residents alone, limiting them to just 5 halibut per year while allowing the Trawl Fleet Slaughter to continue is corrupt - it just makes no sense. Not sure what you guys are thinking, or if you just think no one is watching.

Do the right thing.

Thank you - Tim Berg

**Subject:** Re: Agenda item C-5 Bering Sea Halibut PSC"  
**From:** Pete Wedin <pete@captpete.com>  
**Date:** 1/26/2015 7:55 PM  
**To:** npfmc.comments@noaa.gov

Chairman Hall and Members of the Council:

Halibut has been an important part of my 35 years of Alaskan experience. From longlining to charter fishing, and finally now as a personal use fisherman, halibut is a staple for my entire family. Those of us that depend on the Gulf of Alaska for our halibut must realize that the Bering Sea is a nursery ground that feeds the broad range of Pacific halibut. I strongly support conservation of this very important resource. For the following reasons, I would support a 50 percent reduction of halibut bycatch, or prohibited species catch, (PSC) in the Bering Sea.

The Bering Sea directed halibut fishery is in a state of crisis. For the 2015 season, IPHC proposes reduction of the catch limits in Area 4CDE by a whopping 71 percent. How many of us could weather such a cut?

In the mean time, trawl bycatch caps in the Bering Sea remain unchanged, and millions of pounds **larger** than the directed fishery quota. The truly sad thing about all of this is that more than 65 percent of the halibut bycatch in the Bering Sea is caused by trawlers targeting two species: yellowfin sole and rock sole. How many Alaskans have ever eaten either? My suggestion would be to severely restrict these two fisheries until they can prove they can fish cleanly. I suspect an area closure could effectively accomplish the 50 percent reduction we support.

The state of Alaska has requested that there be an emergency regulation passed by National Marine Fisheries Service to reduce by 33 percent the halibut PSC in the Bering Sea. This would be a first good immediate measure to protect halibut.

More important than that would be beginning the process of analysis at the North Pacific Fishery management Council to permanently protect the Bering Sea from trawl halibut bycatch. Magnuson-Stevens Act National Standard 9 requires that bycatch be reduced. Standard 8 requires the Council to provide for the sustained participation of fishery-dependent communities. The crisis in the Bering Sea demands action under these federal regulations.

As small boat fishermen and the communities they live in suffer from slashed quotas and diminishing returns, the trawl industry continues business as usual. The pain needs to be felt by everyone if we are to preserve this very important resource.

Pete Wedin

Homer, Alaska

--

Pete Wedin  
P.O. Box 3353  
Homer, AK 99603  
907-399-6001

**Subject:** C5 Bering Sea Halibut PSC  
**From:** Clayton smith <claytonsmith626@gmail.com>  
**Date:** 1/26/2015 9:39 PM  
**To:** npfmc.comments@noaa.gov

MY name is Clayton A Smith, commercial fisherman, and writing this on January 26 2015.

I would like to submit my comments for consideration on the Bering Sea bycatch issue. I urge you to address by catch the current caps are and have been unsustainable. 92% of the quota established by IPHC should not be allotted to the trawl fisheries to be dumped overboard. Allowing this to continue, I feel is criminal. Something must be done immediately, even to require the halibut to be kept and split up among the user groups would be an improvement. Dumping an important resource overboard that effects not only the Bering Sea but other areas of the state is immoral at best. Leave the politics and lobbyist out of this equation and do whats right for the resource and the majority of the user groups. I do not currently fish for halibut but, I would sure like it to be an option in the future. Like I stated before the current system in my eyes is criminal. In closing I hope someone actually reads these comments and finally does whats right. There are more of us then ever watching this issue closely. Thanks for your time and consideration in this matter. Clayton Smith



**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** Matt Kopec <matt@fishwhittier.com>  
**Date:** 1/26/2015 9:55 PM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Sir or Madame,

Please accept this letter in reference to agenda item C-5.

As both a business owners dependent on healthy stocks and as personal users of the halibut resource, my family and I find the current state of bycatch management in the Bering Sea and elsewhere intolerable. In our opinion, it is shameful to waste any resource and allowing it in a large amount signals poor management. Allocating 92% (or any significant amount) of a quota as bycatch in times of declined biomass should be criminal and would speak volumes about what drives council decisions.

It's time to be responsible and follow Canada's example.

Sincerely,  
Matt Kopec

Whittier Marine Charters  
*Mail:* PO Box 2693  
Soldotna, AK 99669  
*Summer:* Harbor Loop Drive, Whittier

**Subject:** Agenda Item C5 BSAI Halibut PSC Limits  
**From:** George Malcolm Milne <milnemarine@yahoo.com>  
**Date:** 1/27/2015 6:21 AM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Chairman Dan Hull,

The North Pacific Fisheries Association is a multiple gear, multiple species commercial fishing organization based in Homer, Alaska. Our members have fished the Bering Sea for many years and are deeply concerned with the levels of halibut being removed from the BSAI fishery by the non directed user groups. We ask that the council take immediate action to reduce the PSC limits. The IPHC blue line is 520000 for the directed fishery. This represents an 84% decrease in a five year period while the PSC limits have remained static. We would like the council to consider reducing the current PSC levels by fifty percent. The reduction would still not keep pace with the directed fishery's decline but could provide relief. Going forward we suggest adopting a PSC cap that would be indexed to an appropriate biomass metric. Finally we urge the Council to take immediate action even if it requires emergency authority.

Thank you for your consideration,

Malcolm Milne  
President  
North Pacific Fisheries Association  
PO Box 796  
Homer, Alaska 99603

**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** Steve Jangaard <sejd@me.com>  
**Date:** 1/27/2015 7:01 AM  
**To:** npfmc.comments@noaa.gov

RE: Agenda item C-5 Bering Sea Halibut PSC

January 27, 2015

Dear Council Members,

The current by catch level of 92% for halibut is an embarrassment to the management of our fisheries. I know that money talks and trawlers are big money. That shouldn't be an excuse for the unacceptable wastage. To be meaningful, I think it's important to expand the range of reductions being considered to include at least up to a 50% reduction of the current by catch level.

Steve Jangaard  
Commercial Halibut Fisherman for 42 years

**Subject:** Agenda item C-5 Bering Sea Halibut PSC"  
**From:** "Dennis Zadra \{(Lonesome Dove Outfitters\}" <dennis@idohuntak.com>  
**Date:** 1/27/2015 8:40 AM  
**To:** <npfmc.comments@noaa.gov>

My name is Dennis Zadra and I reside in Cordova, Alaska. I have commercially fished for halibut since 1990. We are at a crisis stage with respect to halibut numbers, and we need to implement as many conservation measures as possible to save this declining species. Bottom trawling is a very destructive fishery and has had a significant impact on the halibut populations. Research now shows that these fish migrate over very long distances, and halibut reared in the Bering Sea will travel throughout the Gulf of Alaska and Southeast. I would encourage you to do all you can to help reduce the mortality of juvenile halibut by the trawl fleet.

Thank you for the opportunity to present my point of view.

Dennis M. Zadra  
Lonesome Dove Outfitters, Inc.  
Wild By Nature LLC  
www.idohuntak.com  
888-388-3683  
907-253-3718 (cell)

**Subject:** Agenda Item C-5 Bering Sea Halibut PSC  
**From:** <rikadog9@gmail.com>  
**Date:** 1/27/2015 8:41 AM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

To the NPFMC,

I would like to urge you once again to please reduce the bycatch limits allowed in the Bering Sea. Please do not give in to the strong commercial trawling lobbies that have been influential in maintaining this abnormal limit for too long.

Data shows that while commercial halibut fisherman IFQ allowances have been reduced for repetitive years to less than 25% of original issue, the allowance of bycatch limits on this same halibut has remained in place. The reason for this status quo remains a mystery, and displays poor judgment for the Council.

Please make a stand and make the responsible decision. Reduce the bycatch limit by a minimum of 50%.

Thank You,  
Chris J Zwolinski  
PO Box 83218  
Fairbanks, Alaska 99708

Commercial Halibut Fisherman in Area 3A  
Licensed Master Guide for Brooks Range/Alaska Peninsula/Kodiak  
Independent Alaska Licensed/Bonded Residential Builder

**Subject:** Bering Sea Halibut Bycatch  
**From:** "Liz" <birdkrazy@msn.com>  
**Date:** 1/27/2015 9:39 AM  
**To:** <npfmc.comments@noaa.gov>

We are a commercial halibut fishing family in the Bering Sea since the mid 1990's we have taken reductions in our halibut catch of 70% We are in strong support of at least a 50% reduction of bycatch in the Bering Sea. The Bering Sea is a viable fishery for our family and many others, we would like to see it continued to be so. Without reducing the bycatch for the trawling fleet this fishery will be destroyed.

Thank you,  
Tim & Liz Wilkie

**Subject:** BYC 15-001 Halibut Bycatch in the Bering Sea  
**From:** "eric jeanes" <ejeanes@r2usa.com>  
**Date:** 1/27/2015 10:29 AM  
**To:** <npfmc.comments@noaa.gov>

Re: Bering Sea Halibut By-catch

Information pertaining to the staggering rates of halibut bycatch in Alaska must cause some alarm to the North Pacific Fishery Council. The highly migratory nature of the Pacific halibut has severe impacts on Oregon, Washington, and British Columbia recreational fishermen. Based on the data presented, bycatch observed in the Alaska fishery renders our harvest as inconsequential in the realm of total Pacific halibut take. I urge you to develop a plan to aggressively reduce the amount of Pacific halibut captured as bycatch during other fisheries; halibut are a species coveted by many more than commercial fisherman in Bristol Bay.

Eric Jeanes  
Recreational Angler  
10432 316<sup>th</sup> Ave NE  
Carnation, WA 98014

**Subject:** Agenda item C-5 Bering Sea Halibut PSC"

**From:** Jim Dettling <jrddiver@yahoo.com>

**Date:** 1/27/2015 11:24 AM

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

**CC:** Jim Dettling <jrddiver@yahoo.com>, Patrick Pitrello <dodgei19@yahoo.com>

Re: Agenda item C-5 Bering Sea Halibut PSC"

1/26/15

To whom it may concern:

My name is James Dettling MD, 6048 W Tidewater Cir. Wasilla, AK 99623 and I am an avid recreational halibut fishermen. I have experienced reduced bag limits on charters in recent years. It is my opinion that all for-profit harvesters should share in the burden of conservation proportionally. As an Alaskan, I am very concerned about the health of the halibut resource and I am depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

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.

Second Reduce Bycatch:

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 by catch.

These are your standards and I respectfully request that you reduce by catch in the Bering Sea as soon as possible and in a manner consistent with the levels that other directed fisheries have taken reductions. Thank you for your time.

Respectfully,

James Dettling MD



**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** Art Bloom <fvcapeclear@gmail.com>  
**Date:** 1/27/2015 11:31 AM  
**To:** npfmc.comments@noaa.gov

January 27, 2015  
Arthur Bloom, Juneau, Alaska, commercial fisher  
Agenda item C-5

Comment:

Absolutely unbelievable that in this day and age we are wasting one valuable resource for any reason whatsoever, let alone so that another resource can be harvested. Bycatch is one problem, wastage is unforgivable. Reduce, and strive to eliminate bycatch and wastage now.

**Subject:** Agenda Item C-5 Bering Sea Halibut PSC  
**From:** Michael Strahan <mike@outdoorssupersite.com>  
**Date:** 1/27/2015 11:45 AM  
**To:** npfmc.comments@noaa.gov

To whom it may concern:

I am the owner of a very large commercial website devoted to providing information about the Alaska outdoors, to residents and nonresidents interested in the sustainable recreational use of Alaska's resources. As an indicator of our reach into this field, our site is in it's 18th year and in 2012 we hit a record high of 9.6 million visitors. We have over 80 forums on our site, where members dialogue about issues concerning the Alaska outdoors.

There has been a fairly lively discussion about halibut bycatch for years on our site, and we believe it is long past time to get this under control. Our site is visited by tens of thousands of recreational halibut fishermen who have been directly impacted by reduced halibut bag limits in the charter fishery. We believe all for-profit harvesters of this resource should share in the conservation burden in a proportional manner. We are depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea bycatch of halibut on your National Standards #8 and #9.

First, protect rural communities in the Bering Sea:

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."*

Second, reduce bycatch:

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."*

These are your standards, and they reflect the concerns of all Alaskans and our guests from the Lower 48. You need to reduce Bering Sea bycatch as soon as possible, and in a manner consistent with the level that other directed fisheries have taken reductions.

Alaska's halibut resources are of great interest to many parties. It is our hope and expectation that the North Pacific Fishery Management Council regard this resource highly enough to craft

fair and equitable standards that are equal among all users.

Best regards,

**Michael Strahan, President**  
**Alaska Outdoors Supersite**  
1 (907) 229-4501  
[alaskaoutdoorssupersite.com](http://alaskaoutdoorssupersite.com)  
[about.me/michaelstrahan](http://about.me/michaelstrahan)



**Subject:** Re: Agenda item C-5 Bering Sea Halibut PSC  
**From:** "Doug Huvar" <dhuvar@gci.net>  
**Date:** 1/27/2015 12:14 PM  
**To:** <npfmc.comments@noaa.gov>

To whom it may concern:

I, Doug Huvar, 8435 Jupiter Drive, Anchorage, Alaska, 99507, am an avid a recreational halibut fishermen. I have experienced reduced bag limits on charters.

Bottom line is that all for-profit harvesters should share in the burden of conservation proportionally. As an Alaskan, I am very concerned about the health of the halibut resource and I am depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

#### 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.

Second Reduce By catch:

#### National Standard 9 – By catch

Conservation and management measures shall, to the extent practicable, (a) minimize by catch and (b) to the extent by catch cannot be avoided, minimize the mortality of such by catch.

These are your standards and you need to reduce by catch in the Bering Sea as soon as possible and in a manner consistent with the level that other directed fisheries have taken reductions.

As a 41 year resident of Alaska, where I have raised my family, two sons, and enjoyed harvesting halibut with them as they have grown up, I hope my sons have the same opportunity to harvest halibut when they have families of their own. The resource needs to be managed for longevity of the resource instead of immediate monetary benefits for the trawl fleet.

Sincerely,

Doug Huvar

**Subject:** Halibut bycatch

**From:** Jeffrey Blankenship <cruzinkruzof@yahoo.com>

**Date:** 1/27/2015 12:33 PM

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

I'm writing this letter to voice my concerns about the trawl halibut bycatch in the Bering Sea. As a commercial fisherman and 2c halibut quota owner, I find it unfair that the trawl fleet gets to conduct business as usual while the directed halibut fishers quota and resource are feeling a negative impact. Please further reduce this bycatch so that Alaska halibut fisheries and fishermen can survive.

Jeffrey Blankenship  
Sitka, Alaska

Sent from my iPhone

**Subject:** Bering Sea Halibut Bycatch  
**From:** Jaycen Andersen <alaskasfreshest@gmail.com>  
**Date:** 1/27/2015 12:38 PM  
**To:** npfmc.comments@noaa.gov

Dear Chair Hull and Council Members,

I am writing to ask you to take immediate action to reduce Bering Sea trawl Halibut bycatch, by a minimum of 50%. I'm a 3rd generation commercial fisherman, it's my lively hood, I live in Alaska, I've invested all my time and money into this business with the understanding that fisheries management would not let bycatch undermine conservation standards that support myself as well as my community. As you are well aware of, trawlers bycatch is astronomically high. We the Alaskan commercial longline fleet continue to take cuts in our quota for conservation. The trawlers have taken none, yet the bycatch continues to devastate the stocks, local jobs, and lively hoods of many Alaskans. We have brought this to your attention before, but no action has been taken. This year if the IPHC's recommended harvest limits for Area 4CDE are appropriated, 92% of the total Halibut harvest will be allocated bycatch, with the longline fleet taking a 71% cut from 2014. This is absurd by every measure and brings into question whether the Council is going to allow only the directed longline halibut fishing fleet to bear the burden of conservation and the halibut resource. The halibut fisheries cannot be the only ones responsible for conservation while trawl bycatch continues to grow at a ridiculously alarming rate. As halibut fishery catch limits drop, the trawlers bycatch continues to increase. It is time the trawlers be held accountable for their consequences of their bycatch, the impacts they've posed on the the halibut stocks, the impact on halibut fisheries, and the impacts on the local communities. Please do something today.

Jaycen Andersen  
F/V Cinnabar  
Sitka, AK

**Subject:** Re- Agenda Item C-5 Bering Sea Halibut PSC

**From:** smbailley <smbailley@mtaonline.net>

**Date:** 1/27/2015 12:50 PM

**To:** npfmc.comments@noaa.gov

1/27/2015

Dear NPFMC- I used to fish for halibut on charter boats from Homer, Seward, Whittier and Deep Creek. Shrinking fish size, smaller limits and increasing charter costs lead my decision to quit halibut fishing.

One way to increase the halibut population is to reduce the incidental bycatch by factory trawlers harvesting other fish. A 50% reduction in by catch over 5 years should be the goal and have statistically meaningful data on halibut by catch collected for each year.

If the halibut recovery plan is implemented I may resume halibut fishing. I am submitting these comments as an individual fisher person.

Scott Bailey  
10335 Stewart Drive  
Eagle River, AK 99577

Sent from my Samsung Galaxy smartphone.

**Subject:** halibut bi -catch  
**From:** Dan Foley <icywild@hotmail.com>  
**Date:** 1/27/2015 1:09 PM  
**To:** <npfmc.comments@noaa.gov>

The halibut catch by trawlers is extream.Bicatch for trawlers has not been reduced while ifq and charter quotas have been slashed. The Councilis not protecting the halibut resource or the small comunities dependent on the resource. Do the RIGHT thing and reduce trawler bi-catch by 50% at least .Dan Foley halibut fisherman 2c&3a.



**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** luke graham <lukegraham\_5@yahoo.com>  
**Date:** 1/27/2015 1:11 PM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

To whom it may concern:

I, Luke Graham am an avid recreational halibut fishermen and have experienced reduced bag limits on charters. In addition to this, I have also experienced lower catch rates and overall average size of halibut while sportfishing in Alaska. It is my opinion that all for-profit harvesters that participate in this fishery should share in the burden of conservation proportionally before Residents are impacted in any way. As an Alaskan, I am very concerned about the heath of the halibut resource and am depending upon the North Pacific Fishery Management Council to make sure all for-profit harvesters are regulated proportionally in the upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

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.

Second Reduce By catch:

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 by catch.

In order with your standards, bycatch in the Bering Sea need to be greatly reduced as soon as possible and in a manner consistent with the level of reductions that other directed fisheries have taken in order to help halibut stocks. The simple fact is that with the current state of halibut stocks, the current level of bycatch in the bering sea is inexcusable and needs to be reduced as soon as possible to help protect this very important resource.

Sincerely,  
Luke Graham  
1219 "U" Street  
Anchorage, AK 99501

**Subject:** Halibut By-Catch issue  
**From:** Cherie Northon <cheries@mapmakers.com>  
**Date:** 1/27/2015 2:12 PM  
**To:** npfmc.comments@noaa.gov

To whom it may concern

By-catch of any fish is a waste, and no one will argue that. When a valuable resource is cast aside as by-catch in a world where people are going hungry and waste should not happen--this is a travesty. I hope that in all your wisdom you will consider doing the maximum or more to protect the precious halibut resources along with all the others. We are a technologically smart society that needs to use what we have to the best advantage.

Please consider carefully the considerations by the Alaska Marine Conservation Council.

Sincerely,

Cherie Northon  
4611 Pavalof St  
Anchorage AK 99507

--

Cherie Northon, Ph.D.  
Mapping Solutions  
P.O. Box 230329  
Anchorage, AK 99523  
907 561-4627  
[www.mapmakers.com](http://www.mapmakers.com)

**Subject:** Bering Sea Bycatch  
**From:** David Pinguoch <agtc.david@gmail.com>  
**Date:** 1/27/2015 2:38 PM  
**To:** npfmc.comments@noaa.gov

To - North Pacific Fisheries Management Council

From - David Pinguoch

Dear Members,

I am a halibut fishing charter operator and sport fisherman. I am writing to support an immediate halibut by catch reduction in the Bering Sea.

Allowing by catch to remain at 7 million pounds or more while cutting the longline fleet by more than 50% and cutting the charter fleets substantially is unfathomable.

Putting this into committee and studying this for a few years is also not acceptable.

A substantial reduction needs to happen NOW.

Sincerely,

David Pinguoch

PO Box 623

Whittier, AK 99693

**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** "Blake Larson" <blake@ledesignak.com>  
**Date:** 1/27/2015 3:46 PM  
**To:** <npfmc.comments@noaa.gov>

To whom it may concern:

I , Blake Larson, am an avid a recreational halibut fishermen. I have experienced reduced bag limits on charters.

Bottom line is that all for-profit harvesters should share in the burden of conservation proportionally. As an Alaskan, I am very concerned about the health of the halibut resource and I am depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

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.

Second Reduce By catch:  
National Standard 9 – By  
catch

Conservation and management measures shall, to the extent practicable, (a) minimize by catch and (b) to the extent by catch cannot be avoided, minimize the mortality of such by catch.

These are your standards and you need to reduce by catch in the Bering Sea as soon as possible and in a manner consistent with the level that other directed fisheries have taken reductions.

As a 37 year resident of Alaska, where I have raised my family, two children, and enjoyed harvesting halibut with them as they have grown up, I hope my children have the same opportunity to harvest halibut when they have families of their own. The resource needs to be managed for longevity of the resource instead of immediate monetary benefits for the trawl fleet.

Sincerely,

Blake Larson

**Subject:** Re: Agenda item C-5 Bering Sea Halibut PSC

**From:** Alan Sloka <asloka6@gmail.com>

**Date:** 1/27/2015 3:49 PM

**To:** npfmc.comments@noaa.gov

To whom it may concern:

I , Alan Sloka, 26626 Virgo Ln., San Antonio, TX 78260, am an avid recreational halibut fisherman. I have experienced reduced bag limits on charters.

Bottom line is that all for-profit harvesters should share in the burden of conservation proportionally. As an Alaskan, I am very concerned about the health of the halibut resource and I am depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

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.

Second Reduce By catch:  
National Standard 9 - By  
catch

Conservation and management measures shall, to the extent practicable, (a) minimize by catch and (b) to the extent by catch cannot be avoided, minimize the mortality of such by catch.

These are your standards and you need to reduce by catch in the Bering Sea as soon as possible and in a manner consistent with the level that other directed fisheries have taken reductions.

Sincerely,

Alan Sloka

**Subject:** Halibut bycatch  
**From:** Ann Bayes <annbayes@gmail.com>  
**Date:** 1/27/2015 3:58 PM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Commissioners:

The time to reduce allowable halibut bycatch mortality by the trawl fleet is NOW.

As a 46 year resident of Alaska, I recognize the rich history of our fisheries resources, as well as the changes that continue to make your decisions more complicated as well as more vital to their continued sustainability.

The time has come to take action. We may not have every scientific answer we would like, and we may not have all the enforcement presence we need; however, voluntary measures do not provide sufficient assurance that all parties are adhering to best management practices in the interest of our halibut resources.

Commercial exploitation of any resource is a matter of economics. Businessmen or women are rarely going to go above and beyond the accepted norms within their industry if it is not shown to be in their best interests. Your job is to establish the regulations that define limits of what is acceptable and therefore in their best interests.

While commercial long liners and guided sport fishermen have had their numbers limited and their shares of the catch reduced dramatically in the past few years, the trawl bycatch has remained excessive.

Please do not defer this necessary action any longer. It is time to take a hard line with regard to the waste of our halibut stocks due to bycatch.

Thank you for your attention and concern in this regard.

Sincerely,

Ann Bayes  
P.O.Box 575  
Anchor Point, Ak 99556

Sent from my iPad

**Subject:** Agenda item C-5 Bering Sea Halibut PSC  
**From:** Vaughn Fowler <vaughn@bandhcpas.com>  
**Date:** 1/27/2015 4:02 PM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

To Whom it may concern

I am an avid recreational halibut fishermen. I have experienced reduced bag limits on charters.

I feel that all for-profit harvesters should share in the burden of conservation proportionally. As an Alaskan, I am very concerned about the health of the halibut resource and I am depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

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.

Second Reduce By catch:

National Standard 9 – By catch

Conservation and management measures shall, to the extent practicable, (a) minimize by catch and (b) to the extent by catch cannot be avoided, minimize the mortality of such by catch.

These are your standards and you need to reduce by catch in the Bering Sea as soon as possible and in a manner consistent with the level that other directed fisheries have taken reductions.

As a resident of Alaska for the last 16 years, in raising my family I have enjoyed harvesting halibut with them as they are growing up. It should be every Alaskan's goal to leave this great land and the resources it offers, in as good of shape as we have it. It is truly my hope that my family will have the same opportunity to harvest halibut when they have families of their own. The resource needs to be managed for the longevity of the resource instead of immediate monetary benefits for the trawl fleet.

Sincerely,

Vaughn Fowler

**Subject:** C5 comments  
**From:** jeff farvour <jefarv@gmail.com>  
**Date:** 1/27/2015 4:59 PM  
**To:** npfmc.comments@noaa.gov

Dear NPFMC Chair Hull and Council Members,

I am an resident Alaskan commercial fisherman who has invested nearly all of my crew earnings in halibut quota of which I fish on my own vessel. I am writing you today for meaningful and immediate reductions of Halibut bycatch in the Bering Sea by at least 50%.

These immediate bycatch reductions are needed avert a crisis and to ensure the viability of the halibut stocks which support the livelihoods of many small boat halibut fisherman in the Bering Sea and around the state. Area 4CDE 2015 halibut fishery catch limits are slated for a 71% reduction from 2014 levels while bycatch would account for 92% of the halibut mortality in that same area. Halibut fisherman bear the brunt of conservation of the halibut stocks through reduced catch limits, yet halibut bycatch limits remain relatively unchanged but account for an increasingly larger percentage of halibut mortality. This travesty prevents halibut fisherman from achieving halibut fishery OY and undermines National Standards 8 & 9. Especially disturbing is the amount of halibut bycatch in the "closed area" in the Bering Sea. This area was put aside to protect the high concentrations of juvenile halibut which migrate out into other parts of the Bering Sea, the GOA and beyond.

Although not currently one of the Council's decision points, I cannot support selling out directed halibut fishing to bycatch fisheries. Our halibut fishery has lost about half of its participants since initial issuance of IFQ's. Reducing further participation in our halibut IFQ fishery is contrary to goals of sustained participation as I feel its important to maintain livelihoods in the halibut fishery and the coastal Alaskan communities that halibut fishing supports, not reduce it.

Please take immediate action to reduce halibut bycatch in the Bering Sea by a minimum of 50%.

Sincerely, Jeff Farvour Sitka, AK



**Subject:** Bering Sea Halibut PSC:  
**From:** Gary Ault <grobault@hotmail.com>  
**Date:** 1/27/2015 7:00 PM  
**To:** Dave <npfmc.comments@noaa.gov>

## HOMER CHARTER ASSOCIATION

**It is time to reduce BYCATCH! This NPFMC will be known for destroying the halibut and King salmon resource in the most abundant ocean habitat remaining in the world. Commercial and guided sport fishermen have had their share of the catch reduced dramatically in the past five to ten years to levels that put mom and pop businesses at an almost no win situation. Meanwhile the trawl bycatch has remained excessive for years. The guided sport fishermen in area 3A took a 40% reduction in catch in one year without regard for guide business survival. Its time to do the same for the trawl fishermen. Remember, this council will be blamed for the injustice of allocation and the total disregard for natural resource sustainability. It is time to do the right thing! It is time to dramatically reduce BYCATCH!**

npfmc.comments@noaa.gov

Gary Ault

PRESIDENT, HOMER CHARTER ASSOCIATION.

**Subject:** Halibut by catch  
**From:** Art <artski@gci.net>  
**Date:** 1/28/2015 3:29 AM  
**To:** "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Npfmc,

Please stop or reduce the halibut by catch. I see the halibut getting smaller and in lower numbers when I go out and fish in prince william sound. Please remember how the east coast over fished and wiped out the cod. We are heading down the same path with halibut. We can do better. Please use your authority wisely. Please respect the need to maintain a sustainable resource for future generations.

Thanks,

Art copoulos

Sent from my iPad

**Subject:** Re: Agenda Item C-5 Bering Sea Halibut PSC  
**From:** "julie miller" <juliemiller614@gmail.com>  
**Date:** 1/27/2015 2:51 PM  
**To:** <npfmc.comments@noaa.gov>

Dear Chairman Hull and Council Members;

I am writing to express my support for the efforts to reduce halibut bycatch in the Bering Sea under the Agenda Item C-5. It is a great injustice as well as ineffective to extract quota reductions from the target halibut fleet, and not apply those same reductions evenly to the bycatch quotas of the trawl fleet. Not only "fair is fair", but since 87% of the total allocation is designated to bycatch, the reduction to the remaining percentage, the target halibut fishery, is not enough to help the stocks, doesn't even dent the rapid decline.

I urge you to consider the option to reduce bycatch caps by 50%, especially in those fisheries that catch a lot of this bycatch. Also because this may not be enough, soon enough, to avoid catastrophe in the halibut stocks, please consider using your authority to implement emergency regulation provisions to deal with this in the interim.

With the knowledge of eastward migration of the halibut from the Bering Sea, this issue has ramifications for the whole Pacific halibut biomass.

Thank You for your time;

Julie Miller  
Seven Sisters Fisheries  
Kema Sue-longline vessel  
quota holder

**Subject:** Bering Sea Halibut Bycatch  
**From:** Kari Johnson <zfish@mac.com>  
**Date:** 1/27/2015 4:49 PM  
**To:** npfmc.comments@noaa.gov

Steve Fish and Kari Johnson

P. O. Box 6448 Sitka, AK 99835

North Pacific Fisheries Management Council

Anchorage, AK

- **Dear North Pacific Council members,**
- **My wife Kari and I have between us lived in Alaska and fished halibut for over 75 years. We have always supported the conservative management of the halibut fishery for maximum long term benefit to all users. We strongly support immediate action to reduce halibut bycatch (halibut PSC) in the Bering Sea by at least 50%.**
- Bering Sea halibut fisheries are facing a crisis. The harvest levels recommended by the International Pacific Halibut Commission (IPHC) for 2015 would reduce catch limits for areas 4CDE by 71% from 2014 levels, and harvests in the directed halibut fisheries in this region have been reduced by 69% from 2007-2013.
- At the same time, the halibut bycatch limits have remained virtually unchanged at over 7 mlbs.
- In 2015, if the IPHC's recommended harvest limits for Area 4CDE are adopted, this means that 92% of the total halibut harvest will be allocated as bycatch, with only a smidgen leftover for the directed fisheries.
- The Magnuson-Stevens Act requires under National Standard 9 that bycatch be reduced.
- National Standard 8 requires councils provide for the sustained participation of fishery dependent communities, but unless the council acts now Bering Sea communities will be cut off from this historic fishery while trawlers are allowed to continue killing halibut in the very same area.
- Communities who depend on the halibut resource do not have the luxury of waiting for

reductions in bycatch to be made through a long drawn out process: bycatch reductions must be made now.

- **Halibut bycatch in the Bering Sea must be reduced comparable to the reductions to the directed fisheries. Halibut bycatch should be reduced by no less than 50%.**

Thank You for your consideration.

Sincerely,

Steve Fish and Kari Johnson



## CENTRAL BERING SEA FISHERMEN'S ASSOCIATION

Post Office Box 288 ▲ St. Paul Island, Alaska 99660 ▲ Phone (907) 546-2597 ▲ Fax (907) 546-2450

January 26, 2015

Dan Hull, Chairman  
North Pacific Fishery Management Council  
Anchorage, Alaska

Re: Agenda item C5 – BSAI Halibut PSC Limits

Dear Chairman Hull:

Central Bering Sea Fishermen's Association (CBSFA) is the management organization for Saint Paul Island under the Western Alaska Community Development Quota Program (CDQ). CBSFA manages a halibut cooperative made up of local halibut fishermen. We purchase, custom process and market the halibut harvested in Area 4C and 4D by our local fishermen and the vessels owned by CBSFA. The halibut fishery is the main source of income for the vessel owners and their crewmembers, and a major contributor to the economy of Saint Paul Island.

Area 4CDE has taken tremendous reductions in Fishery Constant Exploitation Yield (FCEY) the last few years, yet removals of halibut taken as incidental catch in other fisheries has remained relatively unchanged. Halibut PSC use actually increased in Area 4CDE in 2014. This one-sided approach in the name of conservation has come at the expense of the directed commercial fishermen and Bering Sea communities, processors and support businesses.

In 2015 there is the potential for 89% of the total halibut removals in Area 4CDE to be taken by bycatch users, leaving only 10% for directed halibut users.

The effect of this bycatch on the directed fisheries in Area 4CDE is severe. Subtracting 2014 O26 bycatch in Area 4CDE from the Total Constant Exploitation Yield (TCEY), the IPHC has provided harvest advice for 2015 that would set the 4CDE FCEY at 520,000 pounds (Blue Line), a reduction of 60% from 2014, and 86% from 2011.

In the Bering Sea, an Area 4CDE catch limit set at the IPHC Blue Line will cause widespread negative impacts on the livelihoods of the fishermen and local economies of 39 Western Alaska villages. There are 238 fishing vessels home ported in these communities. The Area 4CDE IFQ holders and vessel owners will also suffer significant loss of value to their investments and face potential bankruptcy. Also halibut buyers, processors and local businesses will suffer significant economic losses.

Immediate action to reduce halibut PSC, and minimize halibut bycatch mortality, will have an immediate positive impact on the directed halibut users, particularly in Area 4CDE; would help to improve halibut stock conditions, and would be consistent with objectives under National Standards 8 and 9. Under National Standard 8, the Council must consider the sustained participation of communities when making fisheries management decisions.

The need to reduce total bycatch mortality occurring in the BSAI groundfish fisheries is immediate, so we ask that the first priority of the Council and the National Marine Fisheries Service be to take action on halibut bycatch reductions, particularly in sectors and groundfish fisheries with the highest bycatch use, and bycatch rates, and to implement those new regulations in 2016.

We ask the Council to take final action in June 2015 to reduce halibut bycatch caps in the Bering Sea by up to 50%. The sector with the highest use of bycatch may require the highest percentage of reduction.

We also ask the Council and NMFS to quickly implement measures in the Amendment 80 sector to provide opportunities for deck sorting of halibut, or other handling practices that may reduce mortality of halibut that cannot be avoided.

In the longer term, we believe the preferred permanent solution to the bycatch issue could be setting halibut PSC limits based on the abundance of the halibut resource. All of the other fishery resources in the Bering Sea are managed by the Council and NMFS on the basis of regular surveys and stock assessments to determine what level of removals the stocks can sustain. The IPHC manages the directed halibut fishery on such a basis, while the bycatch users – under Council and NMFS management – catch and discard halibut at an unsustainable level governed by static PSC limits set decades ago.

As a follow-on to the immediate reductions in PSC limits, we ask the Council to prioritize a second action, to analyze the range of potential approaches to establishing a halibut PSC limit based on projections of total biomass, projected spawning biomass, or other appropriate indices of abundance and productivity. We encourage the Council and the IPHC to work together to establish these indices.

The goal of this action would be to provide for an equitable amount of halibut for each user group, with all uses based on an annual scientific determination of the health and sustainability of the resource itself.

We look forward to working with the Council on achieving equitable and sustainable use of the Bering Sea halibut resource.

Best regards,



Phillip Lestenkof, President



January 24, 2015

Mr. Dan Hull  
North Pacific Fishery Management Council  
605 West 4th Ave, Suite 306  
Anchorage, AK 99501

[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Fax: [\(907\) 271-2817](tel:9072712817)

Re: Agenda item C-5 Bering Sea Halibut PSC

Dear Chair Hull and members of the Council,

Kenai River Sportfishing Association (KRSA) is a 501 ( c ) 3 non-profit association of anglers and conservationists dedicated to the sustainability of fisheries resources in Alaska. We would like to provide comment on agenda item C-5 Bering Sea Halibut PSC.

KRSA respectfully requests that the Council take conservation-based allocation action and make meaningful reductions in Bering Sea halibut bycatch PSC. The directed halibut fisheries in the Bering Sea (4CDE) are facing a dire crisis – since 2007 the harvests in these fisheries have been reduced close to 70 percent, whereas halibut bycatch limits in the same region have remained virtually unchanged. All users of a resource should share in the burden of conservation where restrictions are necessary.

National standard 8 requires councils to provide for the sustained participation of fishery dependent communities. Those Bering Sea communities who are dependent upon the directed halibut fisheries are unduly shouldering the burden of halibut conservation measures. National standard 9 requires that bycatch be reduced.

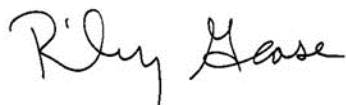
If the International Pacific Halibut Commission (IPHC) are enacted for 4CDE, 93 percent of the total halibut harvest will be allocated as bycatch – quite an unbalanced situation that will virtually eliminate the directed halibut fishery in the region as it will become economically unfeasible for directed harvesters and processors to function. This is a dire situation for these remote coastal communities that are financially dependent on the health of these directed fisheries.



Additionally, coastal fishing communities along the rest of Alaska have been making significant reductions in directed halibut harvests. In 3A and 2B directed halibut harvests in commercial and charter sectors have seen reductions. Bycatch of halibut in the Bering Sea impacts these coastal communities and their fisheries, as the 4CDE region is a primary nursery for halibut in Alaskan waters. As other user groups continue to make important reductions in their harvests of halibut for conservation purposes, it is time to reduce halibut PSC limits in the Bering Sea.

Thank you for your time and attention to this most important matter.

Respectfully,

A handwritten signature in black ink that reads "Ricky Gease". The signature is written in a cursive, flowing style.

Ricky Gease, Executive Director

Kenai River Sportfishing Association

224 Kenai Avenue, Suite 102

Soldotna, Alaska 99669

907-262-8588

4241 21st Avenue West, Suite 302  
Seattle, WA 98199  
206-213-5270 Fax 206-213-5272  
www.groundfishforum.org

January 26, 2015

Mr. Dan Hull, Chairman  
North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

Re: Agenda Item C-5, Bering Sea Halibut PSC

Dear Chairman Hull,

Groundfish Forum represents five companies that operate 14 trawl catcher processor vessels in the various flatfish, rockfish, Atka mackerel and cod fisheries of the Bering Sea, Aleutian Islands and Gulf of Alaska. Members of Groundfish Forum are also members of the Alaska Seafood Cooperative (AKSC). We are writing to comment on the proposed emergency rule to address the directed halibut fishery in Area 4CDE. We are also writing to comment on the Initial Review document regarding the BSAI Prohibited Species Catch Limits for the BSAI groundfish fisheries.

Discussion of Proposed Emergency Rule:

We would like to take this opportunity to discuss the Emergency Action proposed by the State of Alaska letter in December 2014. While declines in the Area 4CDE halibut directed fishery are of great concern, the situation itself does not meet the criteria of the National Marine Fisheries Service's Policy Guidelines for the Use of Emergency Rules.<sup>1</sup> *We do not believe that the criteria established in the guideline document do not support emergency action.*

***The emergency results from recent, unforeseen events or recently discovered circumstances;***

Response: The decline in the directed halibut fishery and the reduction in halibut bycatch are neither recent nor unforeseen events. The recognition of the declining halibut directed fishery and the significant progress being made towards reducing halibut bycatch and discard mortality in the BSAI are well-known to the Agency and to all involved stakeholders. As such, it is not appropriate to use the provisions of emergency rulemaking as provided in section 305(c) of the Magnuson Stevens Fishery Management Conservation Act. This is especially the case when the NMFS and fishing industry participants have a long and consistent record of working on this problem in a transparent and predictable manner.

***Presents serious conservation or management problems within the fishery; and***

Response: The issue in Area 4CDE is not a conservation problem. Information from both the NMFS and the IPHC show that the halibut biomass is abundant and not in decline. Most recently, a letter sent on 20 January 2015 by NMFS Assistant Administrator Eileen Sobeck stated "The

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<sup>1</sup> National Marine Fisheries Service Instruction 01-101-07, Policy Guidelines for the Use of Emergency Rules dated 31 March 2008.

IPHC has not indicated that the halibut stock is at a level that would correspond to being overfished or subject to overfishing” and that “the overall abundance of halibut is consistent with long-term historical averages.”

***Can be addressed through emergency regulations for which the immediate benefits outweigh the value of advance notice, public comment, and deliberative consideration of the impacts on participants to the same extent as would be expected under the normal rulemaking process.***

Response: While emergency action to reduce bycatch by 33% could provide benefit and relief to Area 4CDE fishermen, the impacts to the A80 Sector would be disproportionate and severe. If a 33% reduction had occurred in 2014, it would have resulted in AKSC vessels shutting down on 1 September and would have resulted in 55,000 mt AKSC quota being left in the water.<sup>2</sup> The economic value of this foregone catch would have been approximately \$48 million. Given the scale and magnitude of this potential economic disruption to the A80 fleet at large, sufficient advance notice, opportunity for public comment and in-depth deliberative consideration is truly needed.

#### Discussion of the BSAI Prohibited Species Catch Limits

The Initial Review Document provides a range of options designed to reduce halibut by-catch limits across a large number of halibut bycatch users. While Groundfish Forum is fully supportive of reducing halibut bycatch in our fisheries, the analysis provided within the document is lacking because “deck sorting,” a tool which will likely provide significant halibut bycatch reductions to the A80 fleet, is not part of the analysis. According to the document, “there is not yet sufficient information to analyze halibut mortality reductions as a result of this alternative in time for initial review in February 2015.” Without this analysis in place, any proposal for permanent and severe bycatch reductions is premature. Sufficient time should be given to the A80 sector to determine the effectiveness of deck sorting as a bycatch tool.

To that end, *Groundfish Forum is requesting the Council and NMFS expedite the Exempted Fishery Permit (EFP) review and approve the deck sorting EFP* as was submitted on January 8, 2015 by the Alaska Seafood Cooperative (AKSC). Expedited approval and adaptation of deck sorting in the AKSC fleet would be a significant step forward in reducing halibut discard mortality. In reviewing this request, Groundfish Forum is asking the Council to consider the AKSC’s successful history of reducing halibut bycatch. Using the tools provided through the A80 program, the A80 sector has reduced BSAI halibut catch from an average of 2,650 tons (2003-2007) to about 2,000 tons, a savings of almost 1.5 million pounds per year.<sup>3</sup> The use of halibut excluders, on-the-grounds communications, gear modification, changes in areas and fishing times, and real-time reporting measures have produced substantial benefits. Most recently, AKSC vessels were effective in responding the Council’s request to reduce bycatch in the 2<sup>nd</sup> half of 2014. While AKSC vessels were able to reduce our bycatch by more than 10% from the 5 year average for the final six months of the year, the end result did not ultimately produce the outcome desired by the IPHC. The lack of success however was not due to lack of effort or lack of commitment by the AKSC fleet.

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<sup>2</sup> Alaska Seafood Cooperative End of Year Catch Report

<sup>3</sup> Northern Economics, Inc. Five-Year Review of the Effects of Amendment 80. Prepared for the North Pacific Fishery Management Council. Oct 2014.

After extensive meetings with IPHC staff, the AKSC now has an understanding of how much and where halibut reductions need to occur in order to meet the State of Alaska's goal to have a 1.0 million lb fishery in Area 4CDE in 2015. Based upon our analysis with IPHC, AKSC's proportional share of O26 4CDE bycatch is 48% or 217 mt. Armed with this knowledge and combined with the timely approval of an EFP for deck sorting, the AKSC will strive to meet this goal. While we cannot guarantee an outcome, the AKSC fleet hopes to reach this goal under a voluntary construct similar to what was requested by the NPFMC in June 2014.

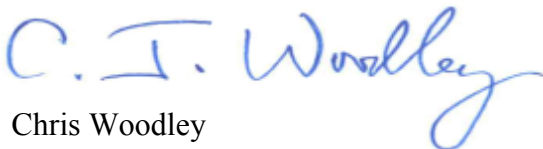
#### Discussion of the Economic Value of the Amendment 80 sector

There are always trade-offs in fisheries management and both positive and negative impacts from fishing. The economic arguments for each side are only part of the story, but it is vital that the full picture of costs and benefits be part of the NPFMC discussion. An excessive reduction in available halibut will have an economic impact not just on the A80 sector, but also on the State of Alaska and the Nation as a whole.

According to the North Pacific Fishery Management Council's report *Five Year Review of the Effects of Amendment 80*, in catching over 750 million pounds of fish a year, the total economic impact of the Amendment 80 fleet is substantial, providing approximately 2,057 fishing jobs aboard 18 vessels. Additionally, the A80 fleet makes approximately 540 port calls in Alaska annually, creating an additional 2,500 indirect and induced jobs within Alaska. Sales of fuel, groceries, moorage, and time in shipyards are major contributors to fishery support services and vendors in rural Alaska communities. These activities contribute millions of dollars in local and state taxes to Alaska - \$4.4 million in fish taxes alone in 2012. Much of this tax revenue is reinvested in the coastal communities that we support with our fishing activity. Given the significant economic contributions of the A80 sector to the State of Alaska and the Nation, permanent and highly restrictive bycatch reductions that could threaten the substantial economic contributions of the A80 fleet should only be considered after the contributions of deck sorting have been formally assessed.

In conclusion, we believe that the Council has the ability to work with AKSC fishermen to address halibut PSC concerns in 2015, without taking unwarranted Emergency Action and without imposing permanent and highly restrictive bycatch reductions. Our sector has demonstrated our commitment to improving performance, and will continue to work very hard to continue to make improvements. The ability to return halibut to the sea quickly through the deck sorting EFP, if approved, could significantly increase the survival of halibut that are caught by our sector. While economics are not the only determining factor for your decisions, we ask that you take the value of the Amendment 80 sector into consideration as part of the regulatory process.

Thank you for the opportunity to comment.



Chris Woodley  
Executive Director



2050 VENIA MINOR ROAD  
P.O. BOX 86  
ST. PAUL ISLAND, ALASKA 99660

January 26, 2015

North Pacific Fisheries Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501  
VIA email: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Re: ***Comments on Agenda Item C5 for February 2015 Meeting***

To Whom It May Concern:

The Aleut Community of Saint Paul Island, a federally recognized Indian tribe located on the Pribilof Islands, submits these comments on NPFMC agenda item C5, Bering Sea Halibut PSC for the upcoming February 2-10, 2015 meeting.

As the Council is aware, area 4CDE has taken tremendous reductions in Fishery Constant Exploitation Yield (FCEY) the last few years, yet removals of halibut taken as incidental catch (PSC) in other fisheries has remained relatively unchanged. Halibut PSC use actually increased in Area 4CDE in 2014. This one-sided approach in the name of conservation has come at the expense of the directed commercial fishermen and Bering Sea communities.

In 2015 there is the potential for 89% of the total halibut removals in Area 4CDE to be taken by bycatch users, leaving only 10% for directed halibut users. The effect of this bycatch on the directed fisheries in Area 4CDE is the most severe. Subtracting 2014 O26 bycatch in Area 4CDE from the Total Constant Exploitation Yield (TCEY), the IPHC has provided harvest advice for 2015 that would set the 4CDE FCEY at 520,000 pounds, a reduction of 60% from 2014, and 84% from the ten-year average.

Our tribal community relies on the Bering Sea halibut fishery and will suffer great economic, cultural, and social hardships if the directed fishery continues to endure drastic reductions. Unchanged halibut PSC use is a direct threat to the health and welfare of our tribal members and our community, as our community already struggles with overwhelming rates of substance abuse, domestic violence, and unemployment. A continued reduction in the directed halibut fishery, in effect leading to a complete closure, will only increase our challenges, as a closure removes essential (and for many, the only) employment and income for the entire year.

We fear our small community will not be able to recover from yet another existential threat to our survival as an Alaska Native community and federally recognized tribe. This unfortunate situation follows similar collapses of the salmon resource in other parts of the state, and points to a definite fisheries management problem that is harmful to species such as salmon and halibut that are key to the survival of our Alaska Native communities and our cultural identity.

Immediate action to reduce halibut PSC, and minimize halibut bycatch mortality, could have an immediate positive impact on the directed halibut users, particularly in Area 4CDE; would help to improve halibut stock conditions, and would be consistent with objectives under National Standards 8 and 9. Under National Standard 8, the Council must consider the sustained participation of communities when making fisheries management decisions.

There is immediate need to reduce bycatch mortality in the BSAI groundfish fisheries, and the first priority of the Council and the National Marine Fisheries Service must be to take action on halibut bycatch reductions, particularly in sectors and groundfish fisheries with the highest bycatch rates, and to implement those new regulations in 2016.

We ask the Council to reduce halibut PSC caps in the Bering Sea by up to 50%. The sector with the highest rate of bycatch may require the highest percentage of reduction. We also ask the Council and NMFS to quickly implement measures in the Amendment 80 sector to provide opportunities for deck sorting of halibut, or other handling practices that may reduce mortality of halibut that cannot be avoided.

As a follow-on to the immediate bycatch limit reductions, we ask the Council to prioritize a second action, to analyze the range of potential approaches to establishing a halibut PSC limit based on projections of total biomass, projected spawning biomass, or other appropriate indices of abundance and productivity. The goal of this action would be to provide for an equitable amount of halibut for each user group, with all uses based on an annual scientific determination of the health and sustainability of the resource itself.

Thank you for the opportunity to submit these comments. We truly hope the Council implements immediate and necessary actions to save the directed halibut fishery and provide our Aleut people with a chance at continued survival in the Bering Sea.

Sincerely,

A handwritten signature in blue ink that reads "Amos T. Philemonoff, Sr." The signature is written in a cursive style with a horizontal line underneath the name.

Amos T. Philemonoff, Sr.  
President, Aleut Community of St. Paul Island



# Alaska Longline

## FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Street Ste 306  
Anchorage Alaska 99501

January 27, 2015

Dear Chairman Hull and Members of the Council,

I submit these comments to you on behalf of the Alaska Longline Fishermen's Association (ALFA) on Agenda item C-5 Bering Sea bycatch. ALFA is a non-profit association of fishing vessel owners and deckhands committed to sustainable fisheries, healthy marine ecosystems and strong coastal fishing communities. ALFA appreciates the high priority the Council has assigned to addressing Bering Sea bycatch at the February meeting, and we urge immediate action to reduce Bering Sea prohibited species catch caps by 50%.

As the Council is aware, in the past decade catch limits in the halibut directed fisheries have been dramatically reduced—and then reduced again—in Gulf of Alaska and Bering Sea. Catch limit reductions in the past 5 years have averaged 52% across the fishery, while reductions in specific areas have totaled over 70%. The reductions have been in response to declines in the exploitable halibut biomass. Slower growth rates and weaker year classes leave questions about the future of the stock. Projections regarding a large biomass of small fish poised to recruit to the fishery have been replaced by far more modest assumptions about average recruitment events. In some areas, catch per unit effort in the survey has dropped to one quarter of levels recorded 10 years ago. Halibut fishermen are concerned about the future of the stock and have experienced significant economic impacts from lower catch limits to promote stock rebuilding.

During this same time, Bering Sea bycatch caps have remained unchanged at 7 million pounds. As you know, the IPHC deducts halibut bycatch from the allowable biological catch before setting the directed fishery catch limits, which has resulted in a significant and ongoing reallocation of the resource from the historic directed harvesters to the groundfish trawl fisheries. This reallocation is more egregious in Area 4CDE, where 87% of the total 2015 halibut harvest could be allocated as bycatch. This reallocation is in direct conflict with National Standard 9, which directs Council to reduce bycatch.

The primary stock component of halibut bycatch is pre-spawners that have not yet contributed to the halibut resource. Significant uncertainty surrounds abundance estimates of this resource component, as

is evidenced by the substantial readjustment of future stock projects that occurred three years ago when the IPHC staff corrected the chronic retrospective bias in the halibut assessment models. Given this uncertainty and the existing low levels of abundance, unmitigated halibut bycatch poses a growth overfishing threat to the halibut resource. As such, halibut bycatch is in conflict with National Standard 1 and undermines efforts by directed halibut fishermen to protect and rebuilding potential stocks.

The halibut fishery is culturally, socially and economically vital to Alaska's fishery dependent communities. The ongoing resource reallocation from these communities to the industrial scale fisheries that are generally home-ported outside of Alaska is in conflict with National Standard 8, which calls on Council to provide for the sustained participation of fishery dependent communities in our Nation's fisheries. The real potential for the communities of St Paul and St George to be excluded from Area 4CDE fisheries by halibut is unacceptable.

ALFA supports the Council taking immediate and effective action to reduce Bering halibut prohibited species catch caps by at least 50%, and to do so through a sector by sector approach. On a more long-term track, ALFA asks that the Council consider a comprehensive suite of Gulf of Alaska and Bering Sea bycatch measures that protect the rebuilding potential of the stock through closed areas, individual bycatch accountability, and abundance based bycatch caps. We believe the condition of the halibut resource and the existing plight of the Bering Sea fishing communities demands this immediate and thorough approach to reducing bycatch.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Behnken".

Linda Behnken





January 26, 2015

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

RE: Agenda item C-5 Bering Sea Halibut PSC

Dear Chairman Hull and Council members:

We appreciate the opportunity to comment on the issue of Bering Sea Halibut Prohibited Species Catch (PSC, or bycatch). The Alaska Marine Conservation Council (AMCC) is an Alaska-based non-profit dedicated to protecting the long term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and families, many of whom rely on healthy halibut fisheries.

Bering Sea halibut fisheries in 2015 face a crisis of dramatic proportions. The harvest levels recommended by the International Pacific Halibut Commission (IPHC) for 2015 represent a 60% reduction from the already greatly reduced 2014 harvest. These harvest reductions –necessary for the long-term sustainability of the stock—would virtually eliminate the halibut fishery in this region, making it economically unfeasible for individual businesses and processing facilities to operate. While harvests in the directed halibut fisheries in this region have been reduced dramatically, the bycatch limits for the groundfish fisheries that operate in the same area have remained relatively unchanged at over 7 million lbs. For years, more of the halibut in this region have been allocated as bycatch than to the directed users. In 2015, this situation has become egregious - if the IPHC's recommended harvest limits for Area 4CDE are adopted, 87% of the total halibut harvest will be allocated as bycatch, with only a smidgen of leftovers for the directed fisheries.

To meet the North Pacific Fishery Management Council's (Council's) obligations under National Standards 1, 8 and 9, and to continue its reputation for sustainable management, it is critical that the Council takes quick and decisive action to right this egregious situation. To that end, we ask the Council to:

- 1. Include an option to reduce bycatch caps by at least 50%, particularly for those sectors which are responsible for the majority of the halibut bycatch in the Bering Sea;**
- 2. Utilize emergency regulatory authority to implement reductions quickly; and**
- 3. Investigate the potential for abundance-based caps, but only to the extent it does not delay this action.**

More specific rationale for these recommendations follows below. We urge you to move forward at this meeting to address this issue of great importance to communities and fishermen throughout Alaska and the Pacific Northwest and to protect this critical resource.

A. Background: the State of the Halibut Resource, Halibut Fisheries and Bycatch

The Pacific halibut stock has been continuously declining over the last decade.<sup>1</sup> The International Pacific Halibut Commission (IPHC) has estimated that there was a 66% decline in catch rates from 2000 to 2013.<sup>2</sup> The female spawning biomass of halibut is about half as large as it was during the 1980s and early 1990s even with low fishery harvest levels.<sup>3</sup> Halibut are a long-lived and slow growing species, and there are no good year classes of recruits in the population, so this situation is unlikely to change in the near future. The decline in population is primarily a result of smaller recruitment strength and decreasing size-at-age.<sup>4</sup>

Bering Sea halibut fisheries in 2015 face an even greater crisis than those of the past few years. The harvest levels recommended by the staff of the International Pacific Halibut Commission (IPHC) for 2015 would provide a mere 520,000 pounds to the directed fisheries in areas 4CDE in 2015, down from an already greatly reduced 1.285 million pounds in 2014. Harvests in the directed halibut fisheries in this region have been reduced by 69% from 2007-2013, and the recommended reductions for 2015 represent another 60% reduction.

Bycatch limits for the groundfish fisheries that operate in the same area, on the otherhand, have remained unchanged at over 7 million lbs. In fact, while catch limits for the directed fisheries have declined dramatically in recent years, halibut bycatch has actually *increased* for some sectors in 2014, compared to the 2009-2013 average. Despite a request from the Council to reduce bycatch by 10% in June 2014, some sectors saw increased bycatch. Taken as a whole, “the BSAI groundfish fisheries were unsuccessful in reducing halibut PSC mortality by the target goal of 10%.”<sup>5</sup> The Amendment 80 sector, which is the largest contributor to halibut bycatch, saw an increase of 3% in 2014 and the AFA CPs saw an increase of 158%.<sup>6</sup> In looking at 2014 bycatch, it is also important to note that within the trawl fisheries, two

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<sup>1</sup> Stewart, I. J. & S. Martell, Assessment of the Pacific halibut stock at the end of 2013, IPHC Report and Assessment and Research Activities at 169 (2013); 79 Fed. Reg. 13,906, 13,907 (March 12, 2014).

<sup>2</sup> Stewart, I. J., S. Martell, B. M. Leaman, R. A. Webster, & L. L. Sadorus, Report to the North Pacific Fishery Management Council on the Status of Pacific halibut in the Bering Sea and Aleutian Islands and the impacts of Prohibited Species Catch at 9 (June 2014).

<sup>3</sup> See *id.* at 196, Fig. 19.

<sup>4</sup> Stewart & Martell at 169; 172; 174.

<sup>5</sup> North Pacific Fishery Management Council, Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis, Revise Bering Sea/Aleutian Islands Halibut Prohibited Species Catch Limits, Initial Review Draft at 49 (Jan. 19, 2015) [hereinafter EA/RIR/IRFA].

<sup>6</sup> *Id.*

fisheries alone were responsible for the majority of the bycatch – the yellowfin sole and rock sole fisheries combined were responsible for 67% of the halibut bycatch.<sup>7</sup>

Bycatch of halibut in the Bering Sea groundfish fishery is not only significant, but at this point in time is the largest source of mortality for halibut in Area 4 by far. On average, groundfish fisheries in the Bering Sea remove 5 million pounds of halibut a year. A large amount of that bycatch is composed of juveniles, or fish less than 26 inches in length. Removal of these juveniles is especially problematic as they serve as the main recruitment for the entire Pacific population.

B. Immediate Action is Needed to Reduce Halibut Bycatch and to Comply with the MSA.

The situation in the Bering Sea has reached a level of absurdity, with 87% of the total mortality in Area 4CDE attributable to bycatch. This situation is contrary to basic principles of equity and fairness, but it is also contrary to the Council's obligations under National Standards 1, 8 and 9 of the Magnuson Stevens Fishery Management and Conservation Act (MSA).

National Standard 1 requires that "Conservation and management measures shall prevent overfishing..."<sup>8</sup> To meet its obligations under this National Standard, NMFS must establish, whether in the Groundfish FMP or in a separate FMP for halibut, objective criteria to monitor the status of halibut stocks and identify when the halibut stock is overfished or subject to overfishing, as required by 16 U.S.C. § 1853(a)(10). Bycatch of halibut in the Bering Sea groundfish fishery is potentially causing overfishing of halibut and the stock of halibut may currently be in an overfished condition. The Groundfish Fishery Management Plan (FMP), which governs the management of halibut bycatch, utilizes prohibited species catch limits to manage bycatch in the Bering Sea. However, the Groundfish FMP does not establish criteria to assess whether the halibut stock is overfished or subject to overfishing. As a result, there is no way for NMFS to ensure that halibut bycatch management measures it implements through the harvest specification process will prevent overfishing or rebuild an overfished halibut stock without first determining whether the halibut stock is overfished or whether the non-target catch of halibut amounts to overfishing.

National Standard 8 requires that "Conservation and management measures shall ...take into account the importance of fishery resources to fishing communities ... to (a) provide for the sustained participation of such communities, and (b) to the extent practicable, minimize adverse economic impacts on such communities."<sup>9</sup> The current situation, in which the halibut resource in Areas 4CDE is overwhelmingly allocated to bycatch, does not comply with the Council's obligations under National Standard 8. A system which places the entire burden of conservation on the communities which depend on the halibut

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<sup>7</sup> National Marine Fisheries Service, Report to the North Pacific Fishery Management Council on Bering Sea and Aleutian Islands In-Season Management Report, (December 2014).

<sup>8</sup> 16 U.S.C. § 1853(a)(1)(A).

<sup>9</sup> 16 U.S.C. § 1851(a)(8).

resource, while allowing bycatch to continue at or above historic levels, is directly contrary to the need to provide for sustained participation and to minimize impacts on such communities. To the contrary the current division between bycatch and directed fisheries appears to *maximize* the impacts on halibut fishery-dependent communities. The community impacts are particularly dramatic for the communities in the Bering Sea. The small communities of this area have little else to rely upon for income, and a loss of the halibut fisheries will result in extreme economic and social impacts to these communities which goes far beyond a dollar value.

National Standard 9 requires that “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.”<sup>10</sup> Given the current status of the halibut stock, the directive to minimize bycatch is even more compelling. A situation in which the directed fisheries catch limits are reduced by 60% in a year while the bycatch limits remain largely the same, with actual bycatch increasing for some sectors, is on its face not an effort to reduce bycatch. It is long past time for the Council to act to reduce bycatch in this fishery, and under the current crisis it is critical that action is taken expeditiously to put the Council’s management of the Bering Sea groundfish fisheries back in compliance with the National Standards.

### C. Recommendations for Council Action

1. Include an option to reduce bycatch caps by at least 50%, particularly for those sectors which are responsible for the majority of the halibut bycatch in the Bering Sea;

Aside from modest reductions for the A. 80 fleet, the halibut PSC (bycatch) caps have not been adjusted in a meaningful way in recent history. While the directed fisheries have faced year after year of reductions as the stock has declined, bycatch has not been similarly reduced. With bycatch taken “off the top” by the IPHC in the TAC-setting process, this leaves the directed fisheries to bear the entire brunt of reductions. Commensurate reductions for the groundfish fisheries are necessary both for reasons of conservation and equity. Yet, the different sectors in the groundfish fisheries that catch halibut as bycatch have very different contributions to the overall bycatch amounts, and use their caps at very different levels. For instance, for some fisheries, amongst the options under consideration only the greatest reduction of 35% begins to achieve a reduction from the current bycatch. While greater reductions may not be necessary for all sectors, to ensure a reasonable range of alternatives is available to the Council, we recommend expanding the range of reductions under consideration to 50%. Even a 50% reduction pales in comparison to the reductions faced by the directed halibut fisheries in recent years.

2. Utilize emergency regulatory authority to implement reductions quickly;

The situation in 2015 is by all accounts an emergency, and this disastrous situation is likely to occur again in 2016 without expeditious action from this Council. We urge the Council to move forward with the current amendment package on an expedited time frame, with final action no later than June 2015.

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<sup>10</sup> 16 U.S.C. § 1851(a)(9).

However, we urge the Council to utilize emergency regulatory authority to ensure new management measures are in place as quickly as possible, and certainly to ensure that we are not in this same situation again next year at this time. The current scenario is a textbook example of the type of situation for which the emergency regulation provisions were designed. Substantial harm and disruption to the halibut fishery and the communities of the region will be caused in the time it would take to follow standard rulemaking procedures. The criteria and justification for emergency regulations have been met, as outlined in the letter from the Alaska Department of Fish and Game Commissioner Sam Cotten, signed by all of Alaska's members on the Council, to the Secretary of Commerce requesting emergency regulations. We therefore ask you again to utilize emergency regulations to put a bycatch reduction in place expeditiously. The Council has used this authority in the past to address bycatch issues – emergency regulations were utilized to exempt the A. 80 fleet from the groundfish retention standard (GRS) when the regular regulatory process was not going to work quickly enough. It is time to utilize this authority now to meet the Council's obligations under the MSA and to restore much-needed balance to the Bering Sea halibut situation.

3. Investigate the potential for abundance-based caps, but only to the extent it does not delay this action.

PSC or bycatch caps which float with halibut abundance could provide a valuable tool for the Council, indexing bycatch levels to the state of the halibut resource as the directed fisheries are. We understand that this issue will be discussed with the IPHC at their meeting this week, as well as at the joint meeting with the Council Feb. 5. We hope to be able to provide more detailed comments regarding this concept at that time. Overall, however, while we support the concept of abundance-based caps, we do not want to see development of this type of alternative delay the Council's immediate action to reduce halibut bycatch. If an abundance-based cap will slow down this action, we urge the Council to take action now on the set of alternatives currently before you and follow-up with an action to develop abundance based caps as a longer term measure.

#### D. Conclusion

Cuts in catch limits have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource. Each halibut caught as bycatch has a direct effect on the spawning biomass and yield available to other sectors now and in the future.

The halibut stock and fishery are in a critical state. It is crucial for both conservation and equity that we reduce halibut PSC limits in the Bering Sea groundfish fisheries immediately. To serve conservation needs, we need the halibut currently wasted as bycatch to have an opportunity to mature and contribute to the spawning biomass. As a matter of equity, we cannot ask other user groups to take huge hits in their catch limits year after year while bycatch limits remain stagnant. We urge the Council to comply with

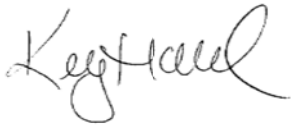
Alaska Marine Conservation Council  
Comments on C-5 Bering Sea Halibut PSC

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MSA and continue its legacy of sustainable management by acting expeditiously to reduce halibut PSC limits in a meaningful way.

We thank the Council for your attention to this important matter and urge you to move forward swiftly with the measures outlined above. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Harrell". The signature is written in black ink and is positioned below the word "Sincerely,".

Kelly Harrell  
Executive Director

January 17, 2012

North Pacific Fishery Management Council  
605 West 4th Ave, Suite 306  
Anchorage, AK 99501  
[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Dear NPFMC Commissioner and Board Members,

I write today to express my concern for the future of the halibut resource in Alaska. I am a life long Alaskan resident as well as a career halibut charter guide in South Central Alaska. I have witnessed the decline of this resource in my life time. Working together and responding with urgency to decrease the overwhelming amount of by-catch in the Bearing Sea, by the trolling fleet, we can and will save our delicate halibut resource. You all have the power to make the right choice and begin the healing process of the halibut resource by decreasing the allowed halibut by-catch by the trolling fleet in the Bearing Sea. It is absolutely disgusting that last year more halibut was wasted than retained in that area.

I have supported myself and my family, for the past 17 years, largely on my ability to charter guide angler's for halibut. Recently implemented restrictions on the charter fleet have put severe financial strain on my household which is here in Alaska. Further restrictions against the charter halibut fleet will directly inflict financial hardship to my household. Please stop the implementing the drastic restrictions against the charter halibut fleet.

As a parent there is nothing more than I would hope for than to leave this resource strong and thriving long after I am gone for my children and theirs. Please help conserve our halibut resource by limiting the by-catch for trollers in the Bearing Sea by 50%.

Thank-you for you consideration.

Sincerely,

Capt. Francisca Barnett  
2609 Afognak Ave  
Seward, Alaska 99664  
c. (907)252-9767



## Bering Sea Elders Group

[www.beringseaelders.org](http://www.beringseaelders.org) • [beringsea.elders@gmail.com](mailto:beringsea.elders@gmail.com)

January 27, 2015

North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

*Re: Agenda Item C-5 – BSAI Halibut PSC*

Dear Chairman Hull and members of the Council,

The Bering Sea Elders Group is made up of elders from 39 participating tribes from Kuskokwim Bay to the Bering Strait. Our mission is to protect our traditional ways of life, the ocean web of life that supports the resources we rely on and our children's future.

The halibut resource is a significant contribution to our local economies as food, income and jobs. We are deeply concerned about the level of halibut bycatch in groundfish fisheries in the Bering Sea. This bycatch affects the overall halibut population and limits opportunity for tribal members along the coast to harvest halibut for our families and to participate in local commercial fisheries. Fishermen in our villages harvest halibut from small boats and skiffs. In 2015 the catch limit is likely to be insufficient for our people to go fishing and earn any money.

We are concerned not only about the impact of bycatch on our fishing opportunity, but about the waste itself. In our culture, we have always been taught to respect everything that the land and sea provides and never to waste what we harvest. It is inconceivable that a situation like this, in which far more halibut is wasted than landed, is allowed to happen at all.

Ultimately, the state of the overall Bering Sea halibut population is important to us because our opportunities to fish are tied to the health of the resource as a whole. Halibut move inshore and offshore at different times of the year for feeding and spawning, which means there is widespread mixing of the fish we harvest throughout the Bering Sea.<sup>1</sup> We know that what happens offshore affects the abundance of halibut that our villages along the coast rely on.

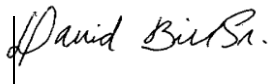
The Bering Sea-wide halibut bycatch cap has remained almost the same since the late 1980s even though the halibut stock has steeply declined in recent years. Last month when the groundfish catch specifications were adopted for the coming year, the Council failed to address the cultural, ecological and fisheries conservation dimensions of this drastic waste of the halibut resource. This

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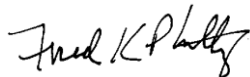


year it appears that halibut bycatch in our Area 4CDE will account for almost 90% of the total halibut catch.<sup>2</sup> The scale of bycatch has reached disastrous proportions and is absolutely an emergency. We urge the Council to make very significant reductions in bycatch to show proper care for our living resources and to enable respectable directed fisheries to thrive in the future.

Sincerely,



David Bill, Sr.  
Chair



Fred Phillip  
Executive Director

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<sup>1</sup> Ian J. Stewart, Steven J. D. Martell, Bruce M. Leaman, Ray A. Webster, Lauri L. Sadorus, Report to the North Pacific Fishery Management Council on the status of Pacific halibut in the Bering Sea and Aleutian Islands and the impacts of Prohibited Species Catch 10 (June 2014).

<sup>2</sup> IPHC. 2015 IPHC Annual Meeting Handout.

[http://www.iphc.int/publications/bluebooks/IPHC\\_bluebook\\_2015.pdf](http://www.iphc.int/publications/bluebooks/IPHC_bluebook_2015.pdf)

To Whom it May Concern:

- **As a commercial halibut fisherman, I strongly support immediate action to reduce halibut bycatch (halibut PSC) in the Bering Sea by at least 50%.**
- Bering Sea halibut fisheries are facing a crisis. The harvest levels recommended by the International Pacific Halibut Commission (IPHC) for 2015 would reduce catch limits for areas 4CDE by 71% from 2014 levels, and harvests in the directed halibut fisheries in this region have been reduced by 69% from 2007-2013.
- At the same time, the halibut bycatch limits have remained virtually unchanged at over 7 mlbs.
- In 2015, if the IPHC's recommended harvest limits for Area 4CDE are adopted, this means that 92% of the total halibut harvest will be allocated as bycatch, with only a smidgen leftover for the directed fisheries.
- The Magnuson-Stevens Act requires under National Standard 9 that bycatch be reduced.
- National Standard 8 requires councils provide for the sustained participation of fishery dependent communities, but unless the council acts now Bering Sea communities will be cut off from this historic fishery while trawlers are allowed to continue killing halibut in the very same area.
- Communities who depend on the halibut resource and the resource do not have the luxury of waiting for reductions in bycatch to be made: bycatch reductions must be made now.
- **Halibut bycatch in the Bering Sea must be reduced comparable to the reductions to the directed fisheries. Halibut bycatch should be reduced by no less than 50%.**

**THANK YOU,  
RYAN NICHOLS**



## CITY OF SAINT PAUL

P.O. BOX 901  
SAINT PAUL ISLAND, ALASKA  
99660-0901  
Admin: (907) 546-3110  
FAX (907) 546-3188

January 27, 2015

Dan Hull, Chairman  
North Pacific Fishery Management Council  
Anchorage, Alaska

Re: Agenda item C5 – BSAI Halibut PSC Limits

Dear Chairman Hull:

The City of Saint Paul Island, the community that I represent as Mayor, is facing an existential threat due to a dramatic reduction in the halibut available for the directed halibut CDQ/IFQ fishermen in area 4CDE, the management area that includes Saint Paul and other Bering Sea communities whose residents are overwhelmingly Alaska Native.

This reduction threatens the livelihood of hundreds of fishermen and crew on Saint Paul and throughout these communities. Since these fishermen and their crews are also their communities' current and future leaders, the loss of this fishery would be devastating to their political, economic, and cultural survival. National Standard 8's directive under the Magnuson Stevens Act that the sustained participation of communities must be considered would therefore clearly be violated, in addition to the trust obligations that the U.S. government has towards federally recognized Tribal Nations.

I will not recap all of our efforts before the North Pacific Fishery Management Council (the Council) for the past 3 years, which you are aware of, to focus the attention of the Council and the North Pacific fishing industry on this problem and the need to adopt urgent and expeditious measures in response. However, the fact is that removals of halibut taken as incidental catch (PSC) in other fisheries has remained relatively unchanged, and halibut PSC use actually increased in Area 4CDE in 2014. This one-sided approach in the name of conservation has come at the expense of the directed commercial fishermen and Bering Sea communities such as Saint Paul. In 2015 there is the potential for 89% of the total halibut removals in Area 4CDE to be taken by bycatch users, leaving only 10% for directed halibut users. The effect of this bycatch on the directed fisheries in Area 4CDE is severe. Subtracting 2014 O26 bycatch in Area 4CDE from the Total Constant Exploitation Yield (TCEY), the IPHC has provided harvest advice for 2015 that would set the 4CDE FCEY at 520,000 pounds (Blue Line), a reduction of 60% from 2014, and 86% from 2011.

Immediate action to reduce halibut PSC, and minimize halibut bycatch mortality, will have an immediate positive impact on the directed halibut users, particularly in Area 4CDE; would help to improve halibut stock conditions, and would be consistent with objectives under National Standards 8 and 9.

The need to reduce total bycatch mortality occurring in the BSAI groundfish fisheries is immediate, so we ask that the first priority of the Council and the National Marine Fisheries Service be to take action on halibut bycatch reductions, particularly in sectors and groundfish fisheries with the highest bycatch use, and bycatch rates, and to implement those new regulations in 2016.

The City of Saint Paul therefore asks:

- 1) the Council to take final action in 2015 to reduce halibut bycatch caps in the Bering Sea by up to 50%. The sector with the highest rate of bycatch may require the highest percentage of reduction;
- 2) the Council and NMFS to quickly implement measures in the Amendment 80 sector to provide opportunities for deck sorting of halibut, or other handling practices that may reduce mortality of halibut that cannot be avoided;
- 3) the Council to consider the preferred, long-term, permanent solution to the halibut bycatch and directed fishery issue may be setting halibut PSC limits based on the abundance of the halibut resource; and,
- 4) as a follow-on to the immediate bycatch limit reductions, the Council to prioritize a second action, to analyze the range of potential approaches to establishing a halibut PSC limit based on projections of total biomass, projected spawning biomass, or other appropriate indices of abundance and productivity. The goal of this action would be to provide for an equitable amount of halibut for each user group, with all uses based on an annual scientific determination of the health and sustainability of the resource itself.

Alaska and the United States' debt to Saint Paul and the Pribilof Islands is big. It was U.S. interest in the Pribilof Island commercial fur seal harvest that led to the purchase of Alaska by the United States in 1867. This harvest was pursued by the U.S. government and undertaken by enslaved Aleut residents such as myself until 1983, after which, the harvest was unilaterally phased out and we were directed by the federal government (without much federal support) to develop a fisheries-based economy. For over thirty years the people of Saint Paul took on this challenge, and with much effort; public and private fisheries-related infrastructure investment; and indebtedness; carved out for themselves a successful participation in the Bering Sea snow crab and halibut fisheries.

All we are asking for is that our efforts and participation in the fisheries that we have helped to develop and that sustain our community's economy and culture, be recognized and protected at levels that will allow our community to survive.

Sincerely,

 Acting City Manager  
for Simeon Swetsov, Jr., Mayor

## **BERING SEA HALIBUT BYCATCH**

As an Alaskan fisherwoman and consumer of halibut, I strongly support immediate action to reduce halibut bycatch in the Bering Sea by at least 50 percent. Emergency regulation is needed to ensure that the halibut fisheries in Alaska will be able to survive in 2015 and beyond. Currently, the International Pacific Halibut Commission recommends major reductions to catch limits for directed halibut fisheries in the Bering Sea. Meanwhile, halibut bycatch caps in the Bering Sea trawl fishery remain largely unchanged. If the IPHC's recommended catch limits for the Bering Sea halibut fishery are adopted, and caps remain the same, halibut fisheries will be allocated just a fraction of the catch, while 92 percent will be allocated to bycatch: fish thrown overboard, usually dead after its time in the trawl nets, essentially wasted.

Overfishing in the Bering Sea is a grave concern, which is why halibut quota has plummeted to well below 1 million pounds, and yet bycatch numbers remain limited at a staggering 7 million pounds. On a cultural and economic level, this resource balance seriously impacts everyone involved in the halibut fishery — whether you're commercial or sport fishermen, a charter company, consumers of the fish, or enjoyers of the subsistence lifestyle. Growing up in Homer, the self-proclaimed "Halibut Capital of the World," each year is marked by a freezer full of fish with summers drawing tourists to the spit to partake in fishing. Boats come into the harbor with the day's catch. We see the diamond-shaped giants weighed on hooks, smell the fishy breeze, and experience what makes our town a vibrant fishing town. Not taking immediate action on halibut regulations is a direct threat to fishing lifestyles and the standard of fisheries management everywhere. The decimation of halibut stock in the Bering Sea is not isolated to the Bering Sea and its communities as halibut tend to migrate, so what happens to Bering Sea stocks is a statewide issue. The large-scale ground fish operations targeting overseas markets waste valuable marine resources that Alaskans rely on. Halibut bycatch in the Bering Sea must be reduced comparable to the reductions to the directed fisheries. Halibut bycatch should be reduced by no less than 50 percent.

Sincerely,  
Oceana Wills#

January 26, 2015

Mr. Dan Hull, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. Jim Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

Re: Agenda items C-4 and C-5, Bering Sea halibut bycatch

Dear Chairman Hull, Dr. Balsiger, and Council Members:

The North Pacific Fishery Management Council (NPFMC) and National Marine Fisheries Service (NMFS) must take action to comply with their obligations under the law to minimize bycatch and prevent overfishing of Pacific halibut. We urge you to take immediate action to reduce the halibut prohibited species caps for the BSAI groundfish fisheries.

As we have explained in our previous letters on this issue, NMFS's obligations under the law are clear. The Magnuson-Stevens Act (MSA) explicitly requires that NMFS "to the extent practicable and in the following priority: (A) minimize bycatch; and (B) minimize the mortality of bycatch which cannot be avoided." 16 U.S.C. §1853(a)(11). This requirement is reinforced in National Standard 9, with which all Fishery Management Plans must be consistent, and which restates the requirement to minimize bycatch to the extent practicable. *See id.* § 1851(a)(9). When it added these provisions to the Act, Congress was very clear that its intent was to halt the "shameful waste" occurring in the nation's fisheries. 142 Cong. Rec. S10,794, at 10,820 (1996).

NMFS must also meet its MSA obligations to prevent, conserve, and manage the Pacific halibut stock and to prevent overfishing. The Groundfish Fishery Management Plans (FMP), which govern the management of halibut bycatch, have not established criteria to assess whether the halibut stock is overfished or subject to overfishing. To meet its obligation to prevent overfishing, 16 U.S.C. § 1853(a)(1)(A), NMFS must establish, whether in the Groundfish FMPs or in a separate FMP for halibut, objective criteria to monitor the status of halibut stocks and identify when the halibut stock is overfished or subject to overfishing. *See* 16 U.S.C. § 1853(a)(10). There are indications that the Pacific halibut stock is currently subject to overfishing and could be potentially overfished.

The Pacific halibut spawning biomass has been in decline since the 1990s.<sup>1</sup> Currently, the spawning stock size is estimated to be less than half of what it was three decades ago, and some models estimate it to be much lower.<sup>2</sup> Projections demonstrate that the spawning stock will continue to decline even under low harvest conditions.<sup>3</sup> Even so, the NMFS has not determined the status of the stock, as required under the MSA.

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<sup>1</sup> Stewart, I. J. & S. Martell, Assessment of the Pacific halibut stock at the end of 2014, IPHC Report of Assessment

<sup>2</sup> *Id.* at 165.

<sup>3</sup> *Id.* at Figure 13.

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In addition, it is apparent that “overfishing” is occurring and has been occurring for some time. Hindcast estimates reveal that the Pacific halibut fishing harvest targets have been exceeded since 2003.<sup>4</sup> In 2014, again, target harvest rates were exceeded, in part, due to larger than expected levels of bycatch.<sup>5</sup> It is possible these high levels of bycatch, particularly since they are comprised of a large proportion of juvenile halibut, could be resulting in both recruitment overfishing and growth overfishing. NMFS and the NPFMC must address this problem.

The continued waste of halibut is shameful. When allowed to grow to maturity and beyond, the Pacific halibut (*Hippoglossus stenlopis*) can be among the largest fish in Alaskan waters (other than the largest sharks) and a great apex predator of the sea. Though the spawning biomass of the stock has been on a declining trend, the Pacific halibut stock still supports a major commercial fishery and a large commercial charter sportfishing industry—even as quotas in those fisheries have been reduced, and recreational and subsistence fisheries have a harder time finding fish. Halibut is important to the U.S. seafood market, and most of the halibut caught in Alaska is consumed domestically. Halibut is even more important as a food source locally since halibut comprises a substantial portion of the fish protein consumed by residents of Alaska.

In the last 10 years (2004-2013), an estimated 82 million pounds of halibut have been killed as bycatch in the federal groundfish fisheries in the Bering Sea (Figure 1).<sup>6</sup> This bycatch includes millions of adult halibut and even more juvenile halibut. Bycatch of massive amounts of juvenile halibut is particularly troubling. Several years of tagging studies are confirming what has been known for decades; the Bering Sea as an important nursery area for halibut. After a few years of growth, halibut may remain and become resident spawners in the Bering Sea or they may disperse widely throughout their range, migrating to other parts of Alaska and elsewhere to populate those regions.<sup>7</sup>

Of great irony is that over the same time period, 37 million pounds (almost 17,000 mt) of this dead halibut bycatch comes from the “Halibut Closed Area”, an area created by the International Pacific Halibut Commission to protect juvenile halibut (Figure 2). Closures of halibut nursery areas to halibut fishing have been used as tools by the IPHC since 1932 to protect juvenile halibut and to enhance the halibut stock. The Halibut Closed Area in the Bering Sea was successful at protecting halibut through the 1960s and 70s while the area remained closed to both the directed halibut fishery and the foreign trawl fleet. Whether correlated or caused by this protection, many of these juvenile halibut subsequently contributed to strong year classes in the mid-70s and halibut abundance improved dramatically.<sup>8</sup> Unfortunately, that protection was undone by the NPMFC in their very first BSAI FMP Amendment 1 which allowed year-round domestic trawling in the ‘Halibut Closed Area’ starting in 1984.<sup>9</sup> Halibut bycatch mortality by the BSAI groundfish fleet has remained over 8 million lbs a year since then.

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<sup>4</sup> Figure 4, 2015 IPHC Annual Meeting Handout

<sup>5</sup> pg. 156, 2015 IPHC Annual Meeting Handout

<sup>6</sup> Data from prohibited species catch reports, available at <https://alaskafisheries.noaa.gov/2013/2013.htm>

Total PSC halibut mortality from 2004-2013 in BSAI NMFS statistical areas

<sup>7</sup> Seitz, A. C., Loher, T., Norcross, B. L., & Nielsen, J. L. (2011). Dispersal and behavior of Pacific halibut *Hippoglossus stenolepis* in the Bering Sea and Aleutian Islands region. *Aquatic Biology*, 12(3), 225-239.

<sup>8</sup> Pg. 91, Revise BSAI Halibut PSC Limits, Initial Review Draft, January 2015

<sup>9</sup> BSAI FMP Amendment 1 - Allowed year-round domestic trawling and longlining in the Winter Halibut Savings Area and Bristol Bay Pot Sanctuary; January 4, 1984 (49 FR 397)

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In addition to taking immediate action to reduce the PSC cap, the Council should consider, in a trailing amendment, spatial management measures including habitat closures and spatial bycatch limits in order to reduce halibut bycatch, protect juvenile halibut, and prevent localized depletion.

The decisions of the NPFMC and NMFS in the past were likely weighted towards a desire to promote U.S. trawl fisheries, providing stability, investment, and growth in the fisheries and the companies. Today, the effects of those decisions are evident, and trawl companies, particularly Amendment 80 cooperatives, have grown profitable and stable. However, the effects of those decisions have also manifested in the condition of the Pacific halibut stock, through high bycatch mortality and reduced opportunities for the target halibut fisheries. NMFS and the Council have helped implement catch share programs in the BSAI for the purpose of reducing bycatch, and it appears that such programs may not be achieving their full potential to reduce bycatch. In the last 10 years, there have been increasing trends in the halibut bycatch mortality in the rockfish (Pacific ocean perch), pollock (“bottom” and “pelagic”), and flatfish targets (Figures 3 and 4). The NPFMC and NMFS must now find a better balance.

There is no shortage of tools that have been granted to the groundfish fleets that could be used to adapt to lower halibut prohibited species caps. For example, the ‘Flatfish Specifications Flexibility’ implemented in 2015 will allow the Amendment 80 and CDQ cooperatives to exchange quota share between yellowhead sole, rock sole, and flathead sole targets. This flexibility should allow the Amendment 80 fleet to selectively target the flatfish species with the lowest rates of halibut bycatch mortality. Currently yellowfin, rock, and flathead sole targets account for 40%, 28%, and 7% respectively of the average halibut mortality by the fleet (Fig 5-29).<sup>10</sup>

We strongly encourage the Council to take immediate action to reduce halibut prohibited species caps and implement management measures that are responsive to spatial concerns and trends in the halibut population. Given the declines in the halibut stock this should be on an expedited NPFMC timeline for action.

We look forward to continuing to work with you for healthy, sustainable fisheries that count, cap, and control wasteful bycatch.

Sincerely,



Jon Warrenchuk  
Senior Scientist and Campaign Manager  
Oceana

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<sup>10</sup> Fig 5-29, Revise BSAI Halibut PSC Limits, Initial Review Draft, January 2015 ,



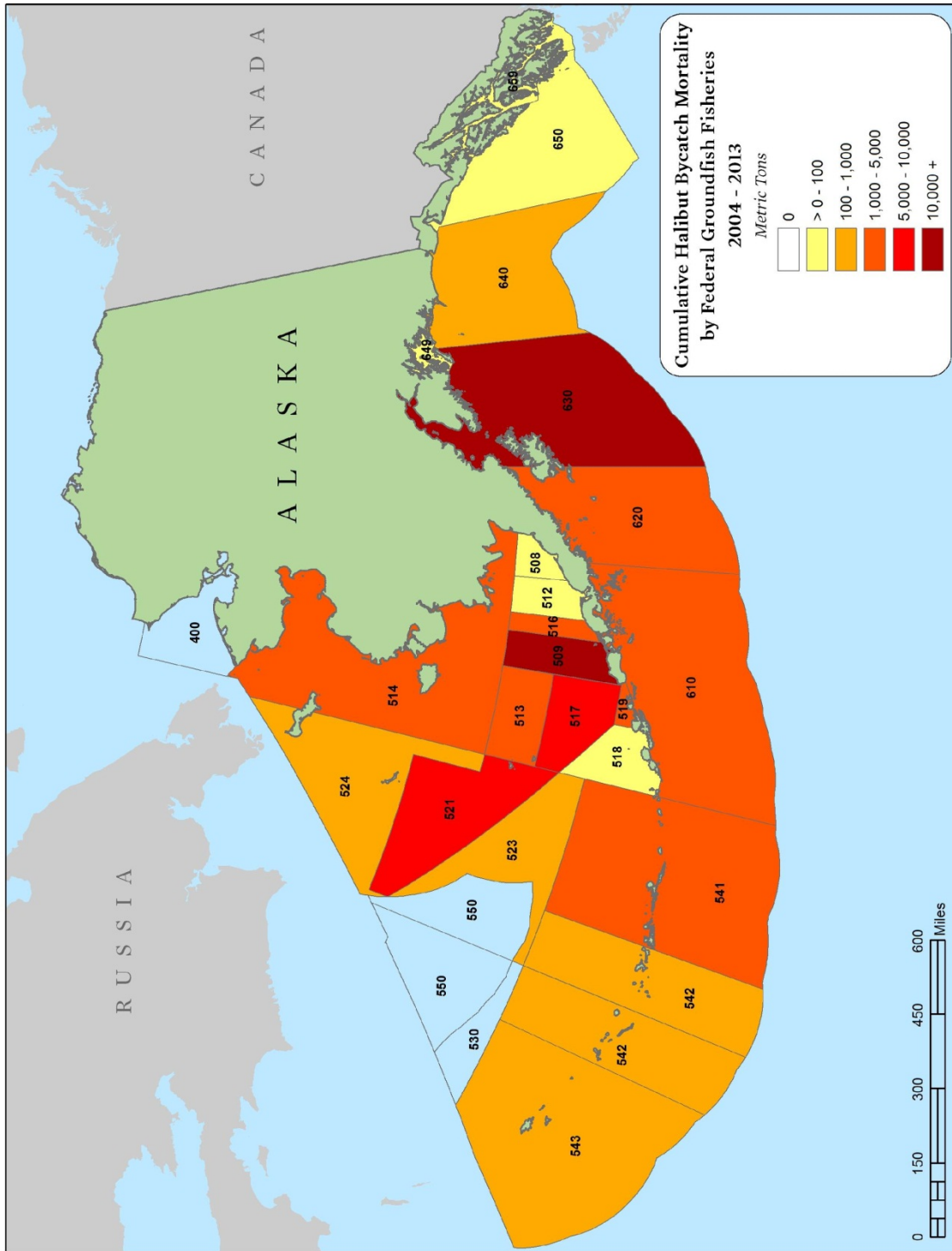


Figure 1: Cumulative halibut bycatch mortality (mt) from BSAI groundfish fisheries in NMFS statistical areas 2004-2013

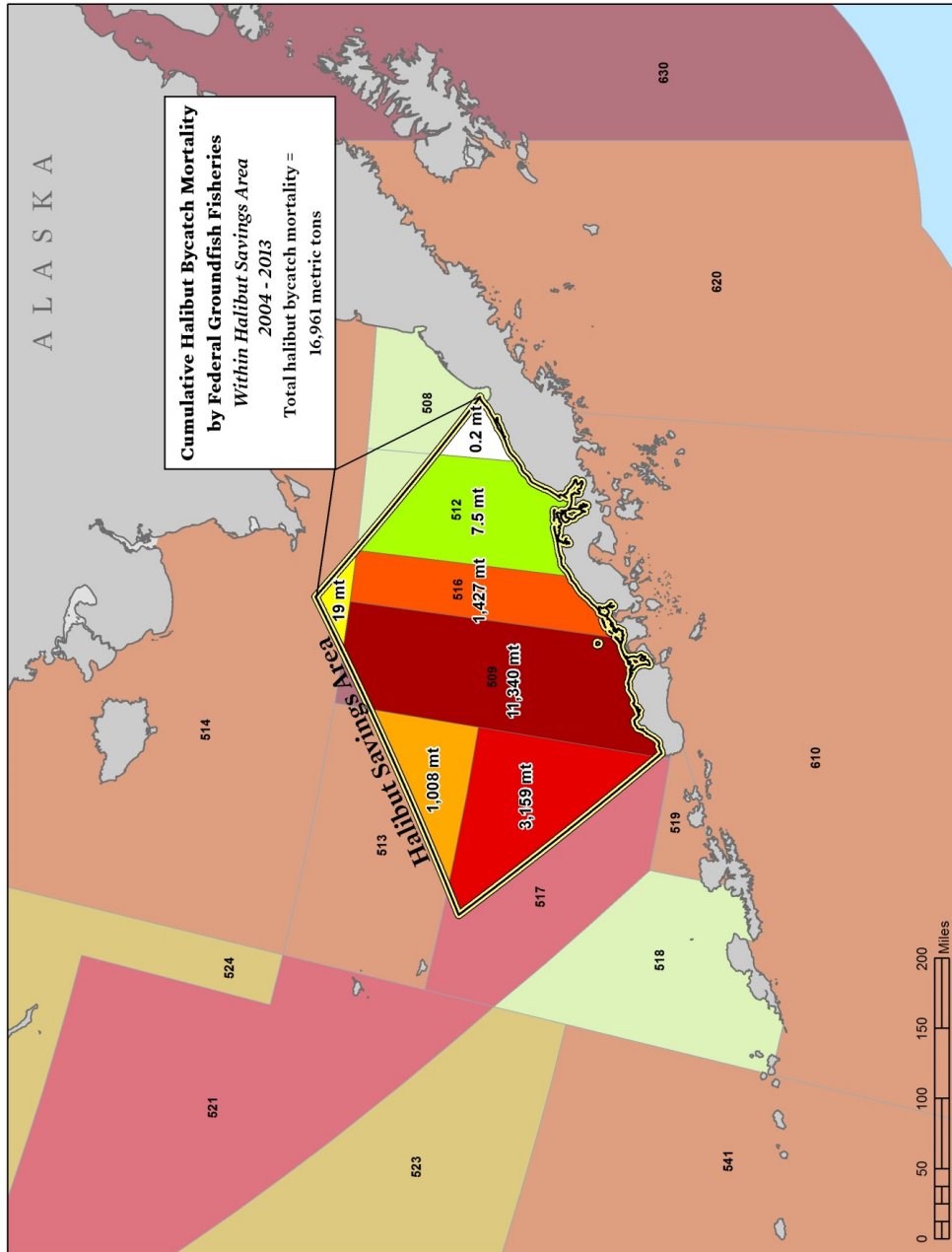


Figure 2: Cumulative halibut bycatch mortality (mt) from BSAI groundfish fisheries in the IPhC Halibut Closed Area

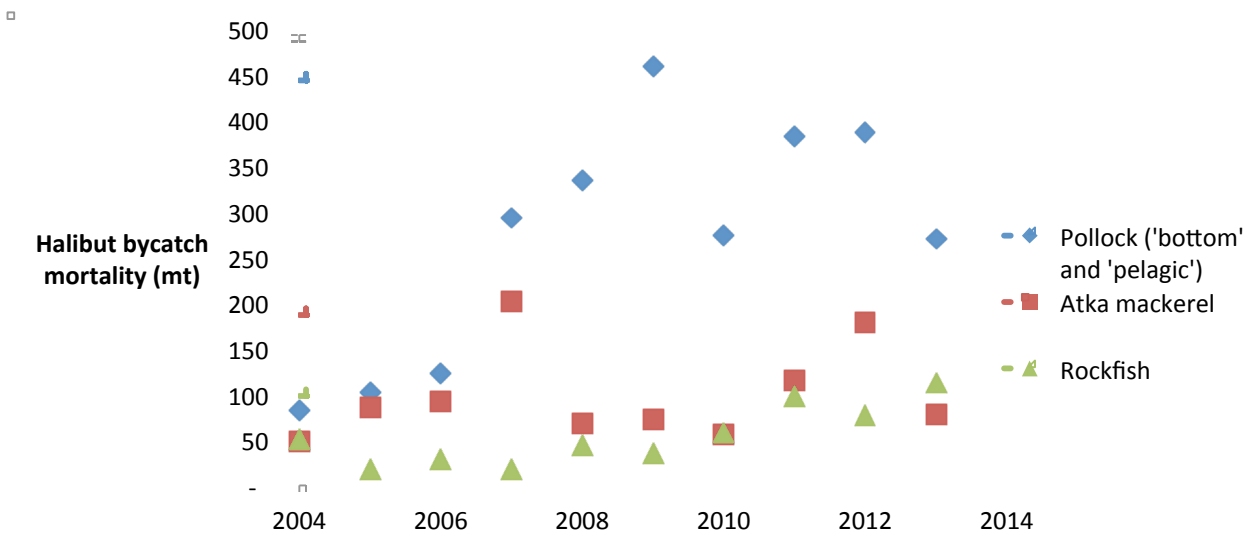


Figure 3: Halibut bycatch mortality in the BSAI flatfish, hook-and-line Pacific cod, and bottom trawl Pacific cod target fisheries (2004-2013).

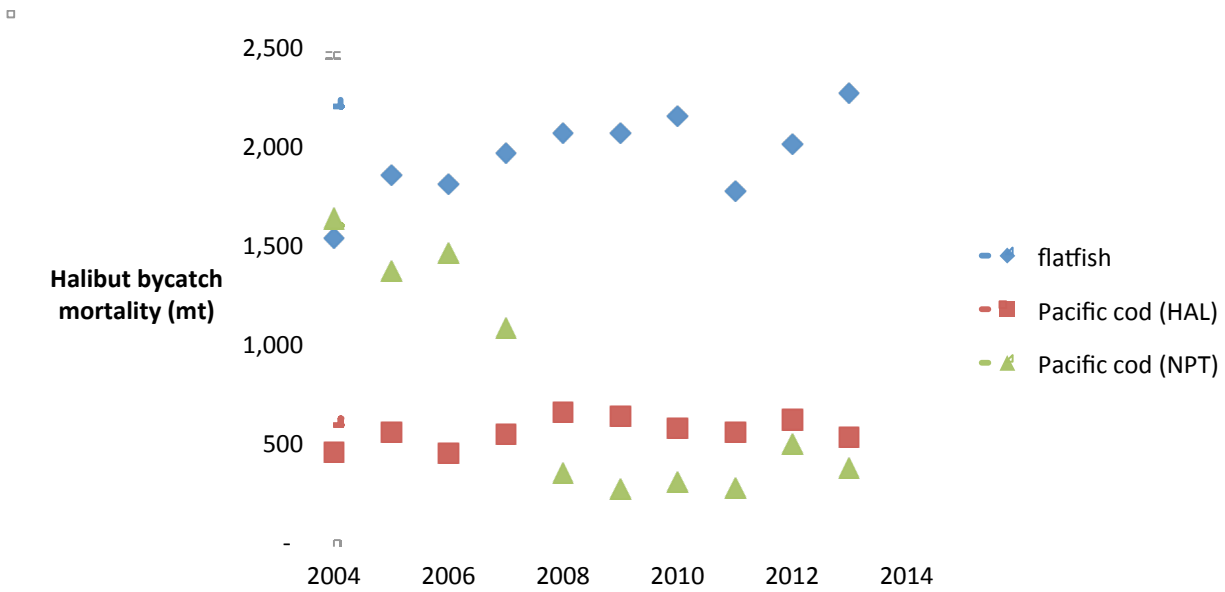


Figure 4: Halibut bycatch mortality in the BSAI pollock, Atka mackerel, and rockfish target fisheries (2004-2013).

To the North Pacific Fishery Management Council,

Council,

I hold Area 2C halibut quota and have been active in the Alaska halibut fishery as a crewman or fishing purchased quota for over 25 years.

Over this time I have witnessed the significant decline in the halibut biomass of area 2C. I am fully aware of the long term decline of halibut biomass in the other regions of Alaska, as well.

Commercial fishermen, throughout most areas of Alaska, have seen our quota shares decline in poundage available to harvest by up to 70% over the last 15 years. We have adjusted to and supported this reduction recognizing the need to first and foremost protect halibut stocks in order to sustain a viable commercial fishery.

Unfortunately the same cannot be said for the impacts the various trawl fisheries have had on halibut stocks throughout much of Alaska's coastal waters. By-catch levels have long been to high with little being done that has actually reduced by-catch levels for this particular harvest method.

It is time to take action and directly address this impact on the halibut stocks in Alaska water. **Of special concern** is the need to immediately reduce the accepted by-catch levels for the Bering Sea trawl fleet by at least 50%. Not only is the directed long line fishery for halibut, in areas 4 C,D and E being affected, the viability of the halibut stocks in this area are being threatened. This is unacceptable in any circumstance. It is a crisis and immediate action is required.

It is time to seriously and specifically address the unacceptable impacts that the trawl fisheries have had and continue to inflict on halibut stocks in the GOA and the Bering Sea.

Noted impacts and associated requirements regarding by-catch of the trawl fisheries are included with this letter.

- Bering Sea halibut fisheries are facing a crisis. The harvest levels recommended by the International Pacific Halibut Commission (IPHC) for 2015 would reduce catch limits for areas 4CDE by 71% from 2014 levels, and harvests in the directed halibut fisheries in this region have been reduced by 69% from 2007-2013.
- At the same time, the halibut bycatch limits have remained virtually unchanged at over 7 mlbs.
- In 2015, if the IPHC's recommended harvest limits for Area 4CDE are adopted, this means that 92% of the total halibut harvest will be allocated as bycatch, with only a smidgen leftover for the directed fisheries.
- The Magnuson-Stevens Act requires under National Standard 9 that bycatch be reduced.

- National Standard 8 requires councils provide for the sustained participation of fishery dependent communities, but unless the council acts now Bering Sea communities will be cut off from this historic fishery while trawlers are allowed to continue killing halibut in the very same area.
- Communities who depend on the halibut resource and the resource do not have the luxury of waiting for reductions in bycatch to be made: bycatch reductions must be made now.
- **Halibut bycatch in the Bering Sea must be reduced comparable to the reductions to the directed fisheries. Halibut bycatch should be reduced by no less than 50%.**

Thank you.

Michael Kampnich

FV Kristina

PO Box 119

Craig, Alaska 99921

Re: Agenda item C-5 Bering Sea Halibut PSC"

I, Melvin Roe, am an avid a recreational halibut fishermen. I have experienced reduced bag limits on charters.

Bottom line is that all for-profit harvesters should share in the burden of conservation proportionally. As an Alaskan, I am very concerned about the health of the halibut resource and I am depending on the North Pacific Fishery Management Council to base your upcoming decision regarding Bering Sea By-Catch of halibut to National Standards #8 and #9.

First protect rural communities in the Bering Sea:

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.

Second Reduce By catch:  
National Standard 9 – By  
catch

Conservation and management measures shall, to the extent practicable, (a) minimize by catch and (b) to the extent by catch cannot be avoided, minimize the mortality of such by catch.

These are your standards and you need to reduce by catch in the Bering Sea as soon as possible and in a manner consistent with the level that other directed fisheries have taken reductions.

The resource needs to be managed for longevity of the resource instead of immediate monetary benefits for the trawl fleet.

Sincerely,

Melvin Roe

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**Public Comment of Stephen Taufen, founder of Groundswell Fisheries Movement**

**Re: C-5 Bering Sea Halibut PSC**

Madame Secretary, Chairman Dan Hull & NPFMC members:

Groundswell is a public fisheries advocacy movement that has testified before the NPFMC for the past two decades, and I am Stephen Taufen, founder. Formerly employed in the Alaskan seafood processing sector, and managed operations for pollock weight grading and related background. This public comment concerns the previously uncontrollable excessive bycatch to which the Council now attends. Groundswell favors:

1. Drastic reduction of halibut PSC, primarily among the groundfish trawl fleet, especially as it applied to the wanton waste associated with the conduct of fishing YSF (yellow fin) and rock sole – products of little to no benefit to USA consumers, with no value-added economic justifications in the USA.
2. Refocus on also building future stocks, i.e. the adjoining mitigation approach – not just concentrating on bycatch – of hatchery and farming programs consideration. Getting over the idea of not allowing finfish farming when there may be good reason to take advantage of it, when appropriate and applicable.

Note that #2 necessitates #1, as if the groundfish trawl segment continues practices affecting massive quantities of 26 inch and under halibut, juvenile removals will remain too high, and most hatchery assistance will go to waste, as well.

3. Greater adherence to the Precautionary Approach (UN/FAO and US Commerce guides) and a rethinking of MSY versus MEY. No fishery that we deal with so often demonstrates the fallacy of running TAC and Bycatch/PSC caps up against the steep precipice of the sustainability curve, far to the right (x-axis) as halibut in Alaska. No wonder there is a collapsing directed fishery.
  - a. If the YFS and rock sole fishing activity does correlate to 67% of the trawl groundfishery total mortality of approx. 87% (some say under IPHC recommendations, that would become 92%) for areas 4CDE halibut, then it means  $(87 \times 67 =) 58.3\%$  is attributable to those non-pollock non-pelagic zone (i.e. substitutes a must fish on the bottom approach of greatest damage to halibut stocks) – per AMCC public comment.
  - b. On a Bering Sea total of 4.4 million pounds (per FVOA letter to NMFS Sobeck of January 23, 2015), then 2.6 million pounds of halibut bycatch to USA fishermen in the directed fisheries may be said to be attributable to the YSF and RS fisheries, of limited USA value.

4. Consideration of possible changes in MSA related to “overfished” (i.e. blame it on the fishermen word games) to “depleted” (i.e. there are many other causes, foremost of which is “low recruit survival” – read as unwarranted non-precautionary trawling destruction). “Depleted” may call for the obvious required changes you so long to grasp in the realm of conservation, sustainability, and greatest maximum value to the USA.
  - a. Accordingly, **Groundswell favors the inclusion of the alternative option for an immediate, emergency rule action, 50% reduction in the trawl fisheries for halibut bycatch.**

Final note, please consider that in both the Bering Sea and the Gulf of Alaska, **no other fishing gear “segment” stands in a heretofore Council-sanctioned position to enact financial havoc on the other gear types as do the trawl groundfish vessels hold privilege**, example herein, to affect halibut or other species. That should impose special WatchGuard responsibilities upon the Council to protect community and related rights for those reliant upon directed fisheries – non-empowered longline, jig and pot fishermen vis-à-vis the powerful trawl lobby and to what one of our members calls “the privatization mongrels.”

Please, put a chain on that dog. There are others in the ocean park, too.

Sincerely,

[ submitted by email ]

Stephen R. Taufen

P.O. Box 714; Kodiak, AK 99615



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January 27, 2014

Dan Hull, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252  
Fax: (907) 271-2817

Re: Agenda Item C-5 BSAI Halibut PSC Limit Initial Review Draft

Dear Mr. Hull:

Thank you for the opportunity to comment on the initial EA/RIR/IRFA for a proposed amendment to the BSAI Groundfish FMP. I submit the following comments on behalf of The Boat Company (TBC). TBC is a tax exempt, charitable, education foundation with a long history of operating in southeast Alaska. TBC conducts multi-day conservation and wilderness tours in southeast Alaska aboard its two larger vessels, the 145' M/V Liseron and the 157' M/V Mist Cove. TBC's clients participate in a variety of activities as part of their visit that include environmental education, kayaking, hiking, beachcombing as well as sport fishing from smaller vessels. Many of these clients relish the opportunity to fish for halibut and efforts to ensure the recovery of the resource over the long term may increase the availability of these fish to recreational fishermen relative to the current regulatory context which restricts the size and amount of halibut available. Additionally, TBC's tours operate in southeast Alaska communities that significantly depend on access to the halibut resource for commercial and guided sport fishing, unguided sport fishing and subsistence. Thus, halibut fishing and long-term conservation of the halibut resource are important to TBC.

Alternative 2 includes sub-options that would reduce the PSC limits between 10 and 35%. Section 2 of the EA explains that the alternatives reflect three objectives: (1) to minimize bycatch to the extent practicable; (2) to provide additional harvest opportunities in the directed fishery and (3) to help improve stock conditions. TBC encourages the Council to identify a preferred alternative that best meets these objectives by reducing the PSC limits by 35%, particularly for the Amendment 80 and trawl limited access sectors that have typically accounted for more than 4.5 million net pounds of halibut PSC mortality per year over the past six years in the BSAI, or roughly 80% of the total PSC mortality in the area. See EA at 48. Given the current stock condition, and uncertainties about the long-term impacts of juvenile halibut bycatch in Area 4, TBC believes that a 35% reduction would be appropriate among the available sub-options in light of the Council's precautionary approach as adopted in the BSAI Groundfish FMP. Additionally, given that the sub-options were developed in June 2014, prior to the release of the 2014 stock assessment indicating a continuing declining biomass trend, TBC requests the Council consider adding another sub-option reducing the PSC limits by 50%.

## **Reducing PSC 35% - 50% will improve stock conditions by reducing juvenile halibut mortality**

TBC's support for a 35% - 50% reduction would help to improve stock conditions in response to a significant conservation concern associated with high levels of juvenile halibut mortality in Areas 4A and 4CDE. Section 3.6.2 of the BSAI Groundfish FMP provides direction for modifying PSC limits that includes consideration of changes in halibut biomass and stock condition and potential impacts on halibut stocks and fisheries. TBC believes that there is a significant conservation benefit based on the high level of juvenile halibut taken as bycatch in the BSAI. The EA misses this point in asserting that reduced PSC limits will not affect halibut differently "as catch will largely be reallocated from halibut PSC mortality to directed fishery catch." EA at 72. It only acknowledges that "there may be *some* conservation benefit to the stock with respect to reducing the mortality of U26 halibut." *Id.* (emphasis added).

In light of the Council's precautionary management approach, it seems more appropriate to consider the alternatives in with an emphasis on the importance of minimizing U26 mortality as critical to ensuring the recovery of the halibut resource. The IPHC has previously stated with regard to Gulf of Alaska halibut PSC that reductions in juvenile (U26) mortality are "particularly important to the health and potential for recovery of the stock from the current low level of exploitable biomass."<sup>1</sup>

This rationale is even more compelling with regard to the BSAI fisheries – as the EA notes, U26 halibut PSC is proportionally highest in Areas 4A and 4CDE. EA at 56. By weight, U26 mortality in these areas can be as much as 40%. *Id.* In terms of numbers of fish, in 2011, there was a total estimated mortality of over 1 million individual U26 halibut in the BSAI, or roughly two-thirds of the U26 PSC mortality in Alaska.<sup>2</sup> Additionally, given the acknowledged uncertainty noted in the EA about the 2004 – 2006 year class halibut which have declined rapidly in abundance in the Bering Sea, and have not appeared in the fishery or surveys, the need to minimize mortality in subsequent year classes seems even more important. EA at 37.

TBC also requests that the Council consider whether the initial review draft's two page analysis of the IPHC Closed Area in section 4.1 of the EA should be expanded in order to provide more information about spatially explicit management measures to address juvenile halibut bycatch. FMP management objectives related to bycatch reduction include consideration of managing bycatch through geographical gear restrictions and bycatch controls through PSC limits, "or other appropriate measures." FMP at 5 (objectives 18 and 20). The EA explains that the "Closed Area provided significant protection to juvenile halibut" and that after bottom trawling was prohibited, "[c]oincidentally, halibut abundance improved dramatically." EA at 91. Then after the Closed Area was reopened to trawl fisheries, halibut mortality in the area "increased substantially" and now accounts for a significant proportion of BSAI halibut PSC. *Id.* Indeed, as reported at the 2015 IPHC Annual Meeting, over the past four years, over 40% of the halibut PSC mortality has occurred in the Closed Area. Further, the number of sampled juvenile fish is much higher in the Closed Area than in other areas. *Id.* at 98. Since halibut abundance has declined dramatically after the

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<sup>1</sup> IPHC Staff. 2011. Item 1. Effect of reducing bycatch limits in the Gulf of Alaska on the halibut exploitable biomass and spawning potential, including downstream effects from halibut migration. March 2011.

<sup>2</sup> IPHC. 2013. Report of Halibut Bycatch Work Group, Version 9 at 43, Figure 4. Available online at [http://www.iphc.int/documents/bycatch/Halibut\\_Byc\\_Work\\_Group\\_rept\\_v9.pdf](http://www.iphc.int/documents/bycatch/Halibut_Byc_Work_Group_rept_v9.pdf)

Closed Area reopened to trawl fisheries, it seems reasonable to wonder: is this really coincidental? The EA neither asks nor seeks to answer the question.

An expanded analysis could assess the relationship between reducing juvenile halibut bycatch in the Closed Area and overall stock abundance in more detail. The Closed Area was established to “aid in the protection of the large population of small, immature halibut” and was closed to the foreign groundfish fleets.<sup>3</sup> The IPHC’s 1998 review of the closed area explained that “[t]he intent of the IPHC for the Bering Sea closed area, to protect small, immature halibut, was violated when the area opened to U.S. groundfish fisheries, which catch large numbers of these small halibut as bycatch.” *Id.* at 244.

The EA briefly describes two IPHC reviews of the Closed Area,<sup>4</sup> which focused primarily on the value of the Closed Area to directed halibut fisheries. *See e.g.* Trumble 1998 and EA at 92 (there was no need to maintain the directed fishery closure due to the distribution of the halibut fisheries). With regard to bycatch, the IPHC identified PSC limits as a primary management control. Trumble, R.J. at 245; EA at 92. However, addressing total mortality through PSC limits does not mean that the analysis should be limited to a brief explanation of bycatch mortality in the Closed Area, particularly given the historical rationale for the Closed Area – juvenile halibut protection – combined with the current stock status and heightened need to minimize juvenile halibut mortality to ensure recovery of the resource.

**A 35% - 50% PSC limit reduction will partially ameliorate the impacts of an ongoing reallocation of the halibut resource from directed fishery users to bycatch**

Additionally, TBC believes that a substantial PSC limit reduction also is an appropriate response to the significant allocative problem resulting from a fixed PSC limit in a declining population scenario, which means that directed fishery user have borne the bulk of the conservation burden. The status quo and lower reduction levels fail to meet National Standard 4’s requirement that an allocation of fishing privileges be fair and equitable, reasonably calculated to promote conservation, and not allocate an excessive share to any group, as well as related BSAI FMP management objectives. 50 C.F.R. § 600.325(a);<sup>5</sup> BSAI FMP at 5 (objective 6 is to provide sustainable opportunities for recreational, subsistence and commercial fishing participants; objective 7 seeks to avoid significant disruption of existing socio-economic structures and objective 8 mirrors the requirement to promote fair and equitable allocations of fishery resources). In its analysis of the no action, status quo alternative, the EA notes that “the level of halibut removals ... under the status quo could result in reduced allocations to the directed halibut fisheries in Area 4 through reduced yield.” EA at 70.

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<sup>3</sup> Trumble, R.J. Evaluation of Maintaining the IPHC Closed Area in the Bering Sea. In: IPHC Report of Assessment and Research Activities 1998 at 243-248.

<sup>4</sup> The EA does provide some useful graphical materials about fishing in the Closed Area. There is a significant shortcoming, however, in that the materials provide spatially explicit information only in terms of the PSC rate but fail to display estimated volumes of halibut PSC and information about size classes. *See* EA at 50 – 54, Figures 3-8 – 3-12 (explaining that PSC rates for some trawl sectors were higher outside the IPHC closed area because of low groundfish catch, and that PSC rates were lower within the Closed Area).

<sup>5</sup> TBC also notes that the key factor in all National Standard 4 consistency findings is whether the regulation is designed to promote conservation. *See Factory Trawlers v. Baldrige*, 821 F.2d 1456 (1987). Thus, Council findings under National Standard 4 could also consider the conservation value of reducing impacts to juvenile halibut that would result from PSC limit reductions because restoring some amount of the historical share of the halibut resource to directed fisheries has the potential to save juvenile halibut.

But this reallocation under the status quo has already occurred. Even as the TCEY has declined, the estimated bycatch mortality has consistently approached the existing PSC limit and even increased from year to year in the Amendment 80 and trawl limited access sectors. The problem is most acute in Areas 4CDE where the majority of BSAI bycatch occurs. EA at 56. The 2011 catch limit of 3.7 million pounds declined to 2.5 million pounds in 2012 (-33%), 1.9 million pounds in 2013 (-24%), 1.3 million pounds in 2014 (-22%), and a .4 million pound recommended catch limit in 2015 (-70%). Conversely, as shown on Table 3-8 in the EA, halibut bycatch mortality in the trawl limited access and Amendment 80 sectors has remained high and even increased slightly over the past three years despite the significant decline in directed fishery catch limits.

Assuming that 74% of the Amendment 80 and trawl limited access sector halibut PSC occurs in Area 4CDE, EA at 171-172, the groundfish trawl PSC share of the resource has gone from 45% (3.0 million pounds out of 6.7 million pounds in 2011) to 72% of the resource (3.4 million pounds out of 4.7 million pounds in 2014) in just four years. Thus, a 35% PSC limit reduction is the only option that will partially restore some level of balance to the 4CDE directed fisheries should the 2015 catch limit projections continue into the future under the current and reasonably foreseeable FCEY. A 50% PSC limit reduction sub-option would be a more appropriate response given the substantial conservation burden borne by Area 4CDE halibut fishermen.

Also, although the most critical socio-economic issue pertains to the Area 4CDE halibut fisheries, it is important the Council's identification of a preferred alternative consider impacts to downstream recreational, commercial and subsistence fisheries. The Regulatory Impact Review (RIR) portion of the initial review draft fails to incorporate the impacts of Area 4 PSC to downstream users and thus omits evaluation of the important future contributions of U26 halibut to other fishery resource users. The Bering Sea is a net exporter of halibut of all sizes, with fish distributing to the Aleutian Islands, Gulf of Alaska and Area 2. EA at 37. Thus, as the EA notes, U26 mortality affects all regulatory areas, yielding a pound to the directed fisheries coastwide per pound of PSC reduction. EA at 56.

Indeed, as shown in the appendices of the IPHC's Halibut Bycatch Working Group's 2013 report, BSAI halibut PSC substantially reduces the lost yield in all other regulatory areas by millions of pounds.<sup>6</sup> Area 4 would receive 22% of U26 mortality savings based on its proportion of the coastwide biomass, EA at 72, meaning that 78% of the U26 savings under a PSC limit reduction would end up in other areas, supporting a larger coastwide distribution of the resource and its availability to fishermen coastwide. TBC thus requests that the Council consider the distribution of U26 halibut to downstream fishing communities and fisheries in its deliberations over a preferred alternative – both in terms of National Standard 4 as well as National Standard 8's requirement that conservation and management measures take into account the sustained participation and adverse economic impacts to fishing communities. 50 C.F.R. § 600.345(a).

### **A 35% - 50% PSC limit reduction best meets National Standard 9's mandate to minimize bycatch**

Finally, a preferred alternative that adopts 35 – 50% PSC limit reductions would best meet National Standard 9's mandate to minimize bycatch and be consistent with past recommendations from IPHC working groups, the conservation burden borne by directed fishery stakeholders, and bycatch reductions implemented in other regulatory areas.

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<sup>6</sup> IPHC. 2013. Report of Halibut Bycatch Work Group, Version 9 at 16, 44-45 (Figure 5).

National Standard 9 requires detailed consideration of several relevant factors, including negative impacts on affected stocks, short and long-term impacts to directed commercial, recreational and subsistence fisheries and in particular the need to adhere to a precautionary approach given the uncertainty about the long-term health of the halibut resource. 50 C.F.R. § 600.350(a),(b), (d).

Halibut bycatch in the BSAI, more than any other IPHC regulatory area, poses significant risks to immediate viability of Area 4CDE halibut fisheries and the long-term viability of downstream commercial, recreational and subsistence halibut fisheries and the resource itself. Over two decades ago, in 1991, the IPHC established its first work group dedicated to investigating halibut bycatch.<sup>7</sup> The group identified an urgent need to re-evaluate and lower BSAI PSC limits because of a recent and rapid decline in recruitment, and a strong cohort of juvenile halibut was vulnerable to the trawl fishery.<sup>8</sup> Its 1992 Report explained that “bycatch is particularly unacceptable when the stock is low or recruitment is weak” and indicated that it would be appropriate for bycatch levels to reflect stock abundance. *Id.* at 19.

Other IPHC regulatory areas have responded to the 1992 HBWG’s recommendations, regardless of stock status, by implementing substantial bycatch reduction measures. Areas 2A and 2B have achieved, through limits and other means, halibut bycatch reductions of 50% and 85%, respectively, relative to historical bycatch levels.<sup>9</sup> But halibut PSC in the BSAI groundfish fisheries alone continues to be in the range of the lower bounds of the 1992 HBWG’s reduction goal for all coastwide fisheries. PSC limit reductions for the BSAI fisheries have been comparatively incremental and small, with the 1993 trawl limit of 3,775 mt reduced by roughly 3% in 2000 through Amendment 57.<sup>10</sup> Now, over two decades later, the stock is low and juvenile halibut are vulnerable. Thus, in view of these conditions and the management measures implemented by other fishery managers, a 35% PSC limit reduction is long overdue.

For the above reasons, TBC requests that the Council’s preferred alternative reflect Alternative 2 sub-options that would reduce halibut PSC by 35% as the most appropriate reduction level given the Council’s goals of minimizing bycatch, providing relief to directed fishery users and improving the overall stock condition.

Sincerely,

Paul Olson

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<sup>7</sup> *Id.* at 5.

<sup>8</sup> Salveson, S. et al. 1992. Report of the Halibut Bycatch Work Group at 19, 25. IPHC Tech. Rpt. No. 25.

<sup>9</sup> Karim, T. et al. 2012. Report of the 2010 Halibut Bycatch Work Group. Int. Pac. Halibut Comm. Technical Report No. 57 at 10 – 11, 33.

<sup>10</sup> Northern Economics, Inc. Halibut Prohibited Species in the BSAI Groundfish FMP and Regulations. Prepared for the North Pacific Fishery Management Council. May 2012 at 9, 10. A reduction plan implemented in 2008 for Amendment 80 vessels then established a functional limit that was 3,525 mt by 2013, or a total 7% reduction since 1993.

To whom it may concern,

My name is Jon Youngblood. I have been participating in various fisheries in Alaska since 1984. I started as a processor on Factory Trawlers, eventually working my way up to the wheelhouse in 1991. After 3 years as mate I moved to Factory long liners and ran the fishing vessel F/V Norton Sound until the spring of 2010 when I lost my job due as a result of the Fishing Cooperatives that formed. My wife contracted terminal Cancer and passed away that same year. Due to my daughter's medical condition (brain tumor), I could no longer fish 8 months a year (as I had the previous 25 years). So I decided to invest in Halibut quota. The first year it worked out fine. I was able to pay bills as well as my bank payment on the loan. It was in 2012 that our first cuts in quota in the Bering Sea and Aleutians. The first cut was 29%. The next two years had similar cuts. My Bering Sea quota went from 54,000 lbs. to 19,000. If IPHC sets the 2015 quotas as they have stated, my Halibut shares will have lost 90% of their value. It isn't all their fault. They have attempted to manage 100% of the stock while having control of only 10-15% of the removals in the Bering Sea. In my opinion this is what needs to be done.

1. A sector split between the directed Halibut fishery and bycatch needs to be done. Without it IPHC will destroy the Commercial Halibut Fishery in the Bering Sea within two years. This is easy for you guys. You have done it in almost every fishery in Alaska. Take historical averages from 2000-2010. 2011- 2014 big cuts were made on the commercial Halibut fishery so it wouldn't be fair to take those. We all win when the stocks go up and everyone feels the pain when the stocks go down.
2. Halibut is a commodity. We need to start treating it like one. It makes no sense that "B" shares cannot be frozen at sea. If you allowed that, I could put my Halibut on a freezer long liner. This would increase revenue for the vessel and reduce mortality because legal fish would be kept for product rather than thrown overboard.
3. The directed Halibut fishery will never bring in the revenue that other fisheries that use Halibut as bycatch do. If Halibut stocks are down but all other directed fishery stocks are up, let me lease my quota to any company that needs bycatch. They are essentially doing this now except for the fact that I get no compensation for the Halibut I bought. I have a bank payment to make and my 2015 quota is based on total removals in 2014.
4. There needs to be a "financial hardship waiver" for Commercial Halibut fisherman. Right now, depending on what quotas are set, for many Halibut fisherman, it's not worth flying up to Dutch Harbor and spend three weeks on a boat to fish a few thousand pounds. Airfare, hotel, and gear will eat up any lease fees. Set hardship at 120% of bank payment. That would allow enough to cover ADF&G permit card and recovery taxes at the end of the year. For myself and many Halibut fisherman this needs to happen immediately to avoid Bankruptcy. It would also allow us to find work in other fisheries so we could make a living. Is that too much to ask?
5. Set line Surveys are on the same spots every year and those positions are published. Trawlers and long liners need to stay off those positions for a month prior to the surveys. This would allow for more accurate stock assessment.
6. NPFMC, once sector splits have been established, needs to take over management of the resource and removals in the Bering Sea and Aleutians. Their track record is better and consolidating the science and management under one agency is just good common sense.
7. Freezer long liners direct fishing for Cod need to be required to leave an area (edge fishing) when Killer whales are present. Killer Whales will strip the line of Halibut bycatch, taking thousands of pounds at a time, leaving little evidence except low Halibut bycatch.
8. Mortality rates on hook and line boats need to be reassessed. 25% of Halibut caught in setline surveys in the Bering Sea have prior hook damage. Cod long line vessels have a Mortality Rate of 13% while Halibut vessels are at 16%. Cod vessels haul at 2-3 times the speed and are gaffing 100's of fish per skate more compared to Halibut vessels and have 3 percent less mortality? These rates contradict what I have observed and common sense. Put cameras above the rollers for monitoring "careful release". That will help a lot.

Self-interest has caused Halibut management to be dysfunctional. Trawl and long line companies benefit from low Halibut stocks. Lower population densities equal lower bycatch and can even be peddled as "reducing bycatch".

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January 27, 2015

Mr. Dan Hull, Chairman  
North Pacific Fishery Management Council  
605 West 4th, Suite 306  
Anchorage, Alaska 99501-2252

**RE: Agenda Item C-5 Industry sector reports on BS Halibut bycatch**

Dear Chairman Hull:

Thank you for the opportunity to provide a second report to the North Pacific Fishery Management Council (Council) on the actions by the Freezer Longline Coalition (FLC) to minimize BSAI halibut PSC mortality by the FLC members' fleet. The FLC recognizes the importance for Council to address halibut mortality and efforts to ensure the sustainability of the BSAI halibut stock. This report will provide the Council an update on halibut PSC bycatch information for the BSAI CP H&L fleet and the efforts the FLC is engaged in to minimize halibut mortality.

**About FLC**

The FLC represents the owners and operators of over 30 U.S.-flag vessels that participate in the freezer longline sector of the Pacific cod fishery in the Bering Sea and Aleutian Islands. FLC member vessels range in size from approximately 110 to 185 feet with a gross tonnage of approximately 140 to 1400 tons. The mission of the FLC is to promote public policy that facilitates the sustainable and orderly harvest of Pacific cod and other groundfish species. All members of the FLC who participate in the BSAI Pacific cod fisheries are also members of the Freezer Longline Conservation Cooperative (FLCC), a voluntary cooperative established in 2010.

The mission of the FLCC is to sustainably manage the quota allocated by the Council to the freezer longline sector of the BS and AI Pacific cod fisheries. FLCC and its members work collaboratively with NMFS to ensure the efficient and responsible harvest of the Pacific cod quota allocated to the sector, including maximizing optimum yield in the fishery and minimizing bycatch of other species. Since its establishment, FLCC has been a leader in efforts to reduce bycatch and promote more sustainable fishing practices in the BSAI.

### Council motion at June 2014 meeting

The Council motion of June 2014 called for all BSAI fishing industry sectors to “undertake voluntary efforts to reduce halibut mortalities in the BSAI resulting from PSC use....by 10% from the current 5-year average levels through 2014-2015 fishing season. To evaluate progress in these efforts, the Council also requests industry to report back to the Council on measures that are being implemented and developed, and to the extent possible, the effectiveness of those measures in terms of absolute reductions in halibut mortalities.”

### Halibut PSC mortality by FLC fleet in 2014

The FLC has met the Council charge of reducing halibut mortality in the 2014 fishing season (relative to the 2009-2013 average). The FLC has achieved more than a 10% reduction in both halibut mortality and mortality rate (source: NMFS CAS and FIS).

BSAI CP H&L	2009-2013 avg.	2014	Change (%)
Halibut Mortality, mt	514 mt <sup>1</sup>	395 mt <sup>2</sup>	-23.2%
Mortality Rate (kg halibut mortality/mt groundfish)	4.31 kg/mt <sup>3</sup>	2.88 kg/mt <sup>4</sup>	-33.2%

The above table overestimates both actual halibut mortality and mortality rate as these calculations are based on the assumed discard mortality rate (DMR) in 2014 of 9% (for non-CDQ CP H&L) rather than the actual observed rate in 2014 of 7.9%. Using the actual DMR, the actual 2014 halibut mortality is further reduced to **347 mt** and the mortality rate declines to **2.53 kg/mt**. This is the mortality of less than one six pound halibut for every ton of groundfish.

In the NMFS In-season Management Report at the December NPFMC meeting, only three sectors achieved a -10% reduction in both halibut mortality and mortality rate in 2014 (relative to the 2009-2013 avg.). Two of those sectors are hook-and-line gear (CP H&L and CDQ H&L). In Table 3-10 (p. 49) of the NPFMC January 2015 analysis, in the aggregated sectors, only the CP hook-and-line sector achieved a -10% reduction in total mortality and mortality rate.

### FLC actions to address halibut PSC mortality

The FLC and its members take seriously our responsibility to be stewards of the environment and the resources that inhabit the waters we fish. Our members are Alaskans and Washingtonians who have spent their careers living and working in Alaskan communities. We understand the reliance of Western Alaskan communities on the resources of the Bering Sea and share an interest in sustaining those resources for all of us to continue to harvest now and for future generations. As we noted in our initial report in June, FLC members have an extensive history of voluntary actions to minimize halibut PSC mortality by our fleet. Our FLCC membership agreement includes specific language on the management of PSC catch by members, including severe penalties for exceeding limits on PSC catch established by the

<sup>1</sup> NMFS BSAI Inseason Management Report, “2014 BSAI Reduction in Halibut Mortality”. December 2014

<sup>2</sup> NMFS Inseason CAS, December 31, 2014.

<sup>3</sup> NPFMC Initial Review Draft “Revise BSAI Halibut PSC Caps”, Table 3-10, p. 49

<sup>4</sup> Ibid.



cooperative. These are actions that were facilitated by our own efforts to proactively address PSC mortality by our fleet. Other actions taken by FLC to minimize halibut PSC mortality include:

- *Weekly reports on halibut PSC:* Janet Smoker/Fisheries Information Services (FIS) provides our fleet with two weekly reports, including information on halibut mortality by our boats and updates on discard mortality rates for each vessel. These reports help members to monitor halibut PSC trends and rates by season.
- *Catch data on Sea State:* Similarly, our members have access to regularly updated catch data produced on target and bycatch species, including halibut. This services provides members with extensive, near real-time data on their catch and enables them to map their recent activity.
- *Careful release practices:* FLC members train all crew on careful release of halibut. Crew are taught the best methods for handling all PSC species to enable them to return to the sea minimally affected by their encounter with our boats.
- *Annual meeting for crew officers:* FLC hosts an annual symposium for vessel officers and crew to give them an opportunity to hear reports about actions at the Council and other developments that may potentially affect their operations. We held our 2014 symposium in May, which featured a report on halibut DMR from Janet Smoker, as well as other presentations from current and former NMFS officials. These events help keep our officers and crew current on management and regulatory actions in the fishery as well as helping to inform other symposium participants about what's happening on the water.
- *100% observer coverage, plus scales:* The FLC collaborated with NMFS to institute 100% observer coverage on our entire fleet. Members were required to accept observer coverage on their vessels as a component of membership in the FLCC. More recently, our entire active fleet (except one vessel) added flow scales as a means of further monitoring our catch. Vessels without flow scales began carrying two observers until the scale was installed. The addition of scales required nearly \$100,000 of new equipment on each of the FLC vessels. The one vessel that does not currently have a flow scale maintains two observers on the vessel.
- *FLC Halibut Bycatch Committee:* In 2014, the FLC formed a Halibut Bycatch Committee for members to review halibut PSC catch data for our fleet and address any concerns that emerged related to our fishing practices. This committee was central to promoting additional discussion on halibut PSC reduction within our membership and to identify and encourage further efforts by members to carefully monitor and reduce their bycatch in 2014.

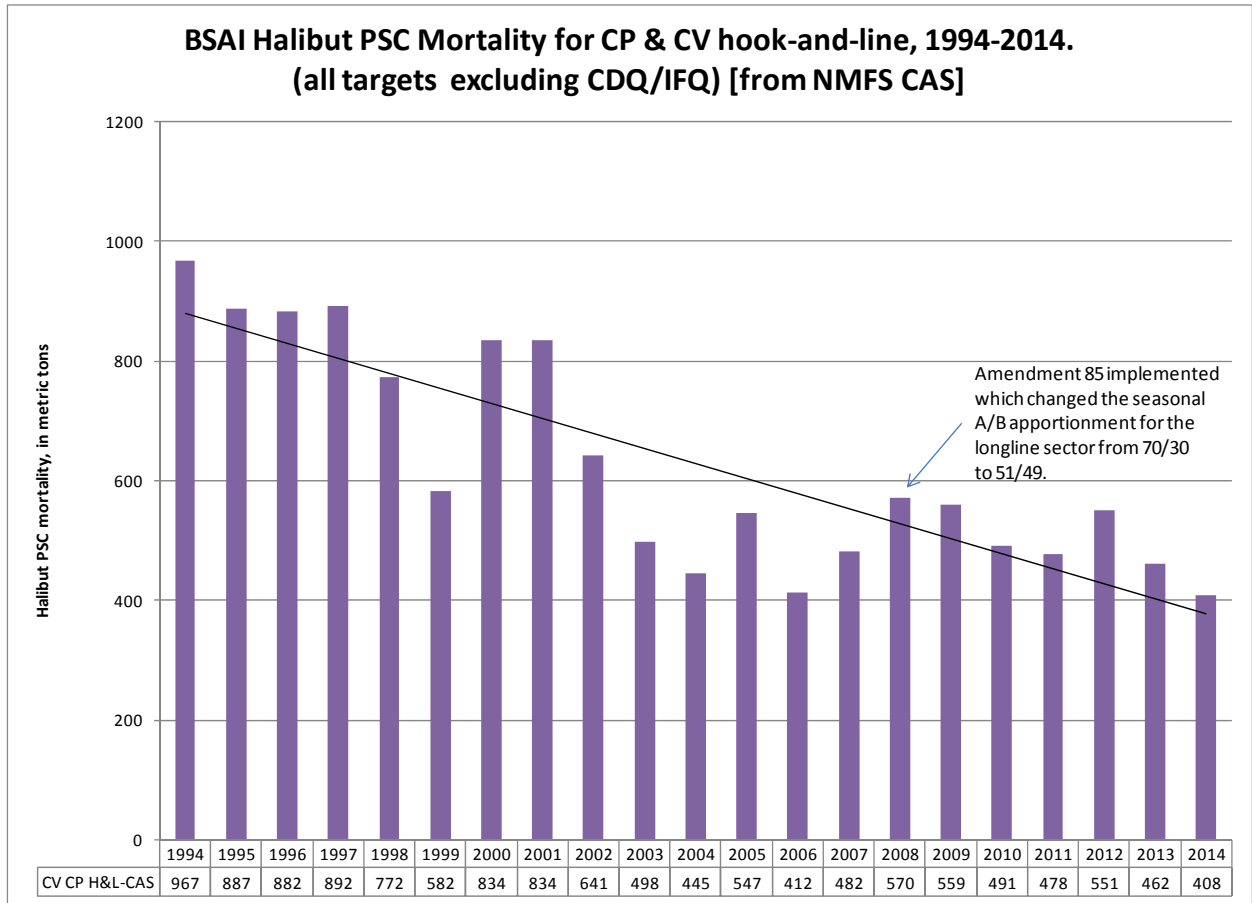
#### **History of reductions by the FLC fleet**

Actions by the FLC and our members have produced dramatic reductions in BSAI halibut mortality in the past 10 years, with significant reductions in total mortality, discard mortality rate (DMR), and encounter rate. From 1994 to 2014, in the BSAI non-CDQ CP H&L sector:

- Total halibut mortality has been reduced **-58%** (Figure 1).
- Actual DMR (discard mortality rate) has been reduced **-47%** (Figure 2).
- Encounter rate (kg halibut/mt groundfish) has been reduced **-41%** (Figure 5).

The following figures provide additional details on the freezer longline fleet’s successful efforts to minimize our impacts on the halibut resource in the BSAI.

**Figure 1: Total Halibut Mortality**



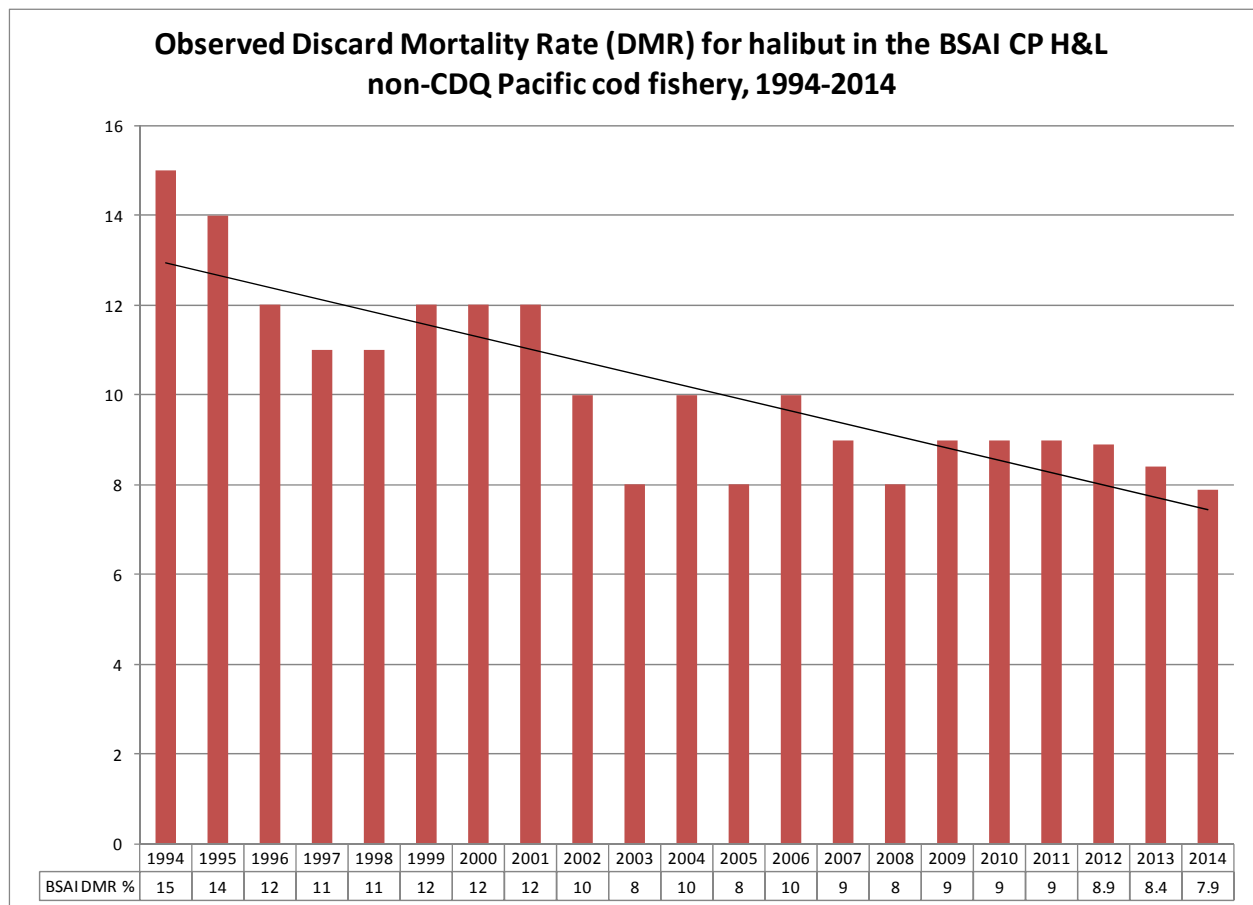
**Figure 1** shows total halibut mortality from the combined BSAI non-CDQ CV and CP H&L sectors. Prior to 2002, CP and CV data were merged together, so for purposes of continuity in Figure 1, the CV and CP H&L data are merged together for all years. In 2014, halibut bycatch from the BSAI non-CDQ H&L sector was **11.7%** of the total halibut mortality of all BSAI groundfish sectors combined (trawl, non-trawl, and CDQ).

Total halibut mortality slightly increased after the implementation of Amendment 85 in 2008, in part due to the change in the seasonal apportionment of p-cod to the CP H&L sector (which mandated a higher proportion of fixed gear cod harvest in the B season when there is a higher halibut encounter rate).

Despite the change in seasonal apportionment cod harvest, the overall reduction in halibut PSC mortality in the BSAI non-CDQ H&L sector is **-58%** (1994 to 2014). In 2014, halibut PSC use in the CP H&L sector alone was reduced **-23%** from the previous five year average (2009-2013).

The mortality in Figure 1 is based on the assumed DMR (from the IPHC and adopted by the NPFMC during harvest specifications). The actual observed DMRs for BSAI hook-and-line gear are significantly lower than the assumed DMRs for 2002-2014. The actual mortality is over-estimated by more than 21% per year (2002-2014 avg.) by using the assumed DMR (Figure 3).

**Figure 2: Discard Mortality Rate (DMR):**



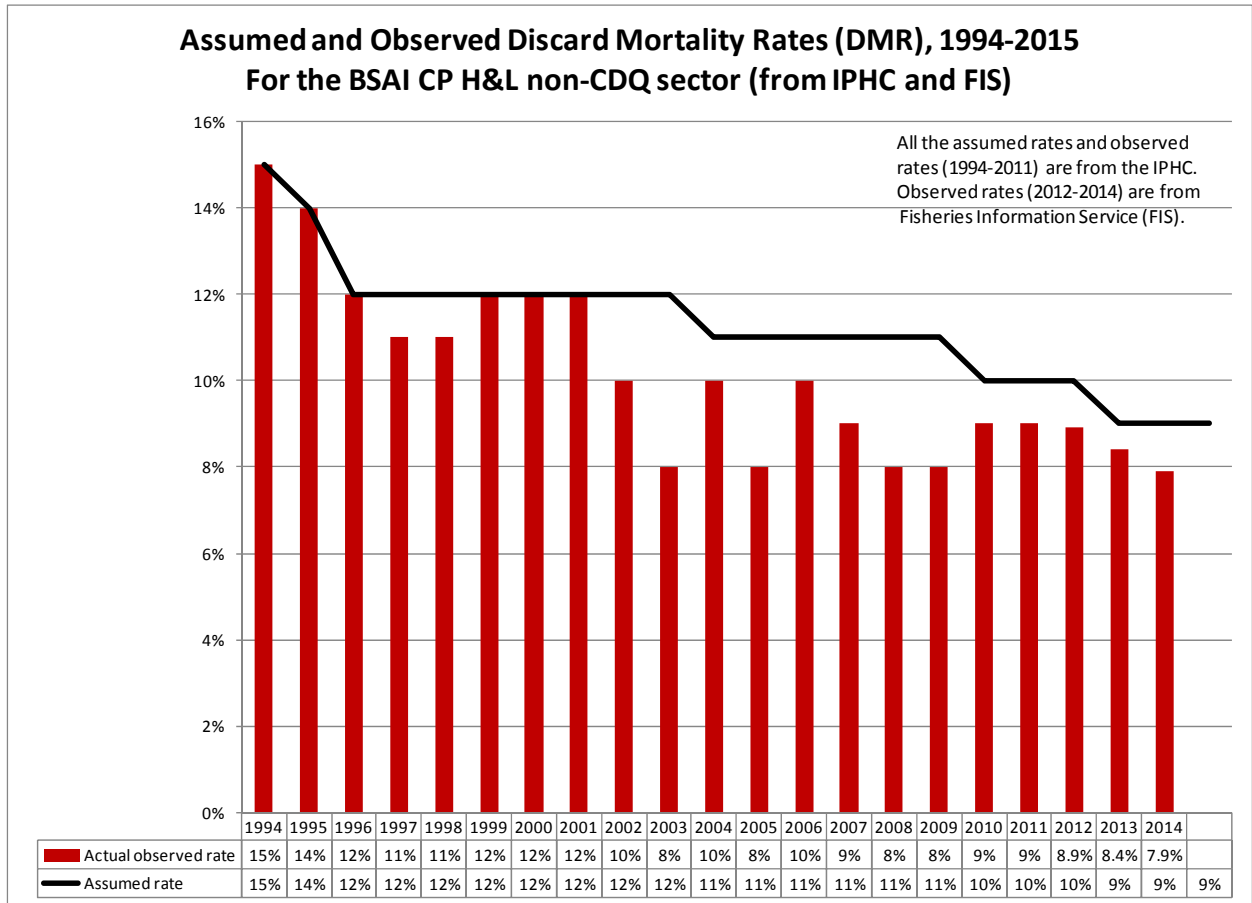
**Figure 2** shows the actual observed DMR for the CP H&L sector. With improved handling of halibut, this sector has steadily reduced the actual observed DMR rate by **-47%** (1994 to 2014).

While large improvements in handling have been made, further incremental reductions in the DMR will become increasingly more difficult to achieve. A “perfect” score for hook-and-line gear in halibut viability is currently 3.5%.<sup>5</sup> The observed DMR rates are subject to IPHC review and are used to calculate the assumed DMR (a ten moving average reviewed every three years).

Since 2002, the assumed rate has been higher than the actual observed rate. This is a result of a steadily declining observed rate in conjunction with the method to determine the assumed rate. For example, the current assumed DMR for the BSAI non-CDQ H&L p-cod fishery is 9% while the actual rate in 2014 was 7.9% (or 12% lower than the assumed rate). If the assumed DMR is higher than the actual observed DMR, then the use of the assumed rate over-estimates actual halibut mortality in a given year. For reference, the IPHC assumed DMR for the directed halibut fishery is 16%.

<sup>5</sup> IPHC staff may be revising this estimate which will change all historic estimates of bycatch mortality in groundfish hook-and-line fisheries as well as changing the estimates of wastage in the directed halibut commercial and sport fisheries.

**Figure 3: Assumed DMR versus Observed DMRs**



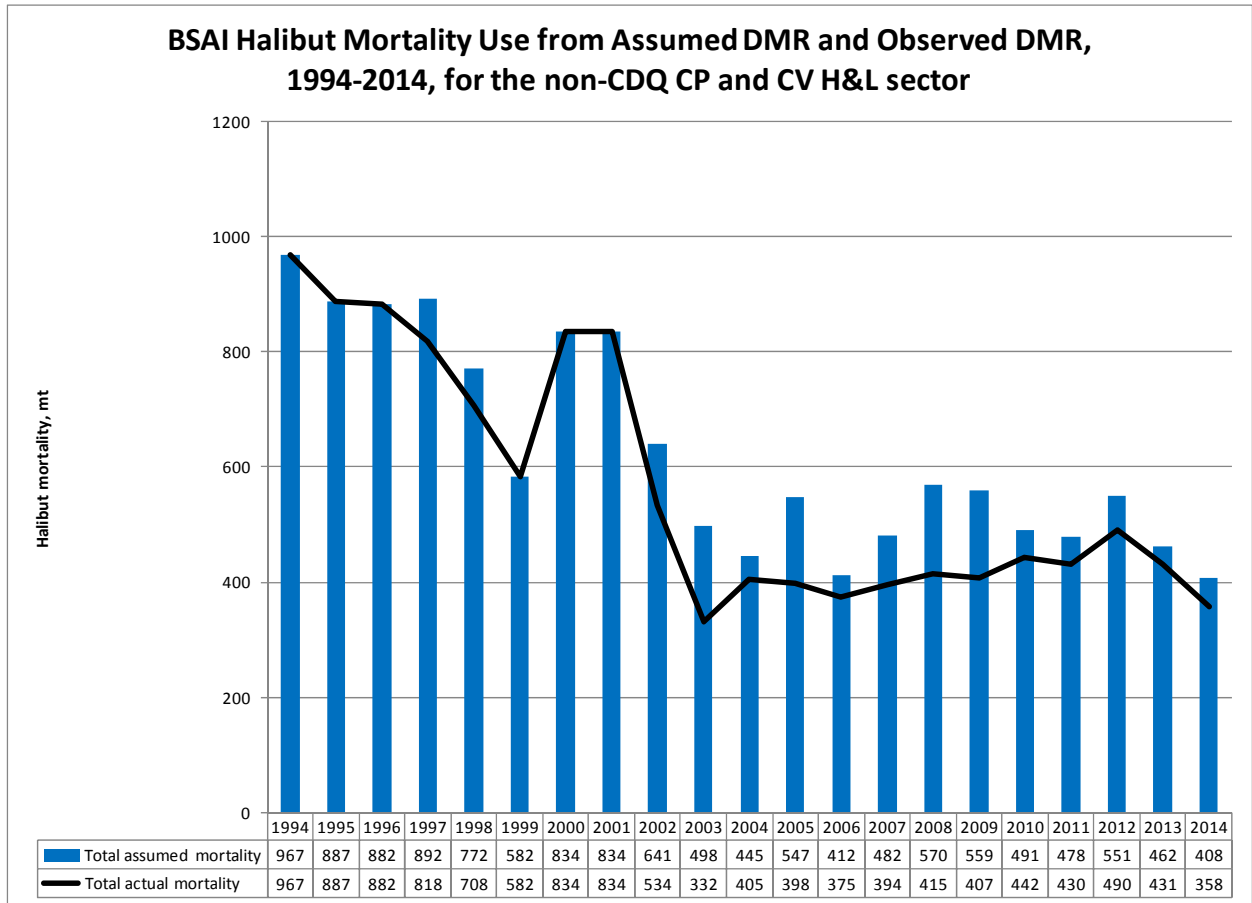
**Figure 3** compares the assumed DMR rate with the actual observed rate. The use of the assumed DMR to calculate total mortality (instead of the lower observed actual rate) results in actual mortality for CP BSAI H&L sector being over-estimated.

Discard mortality rates are of significant importance in efforts in to reduce halibut bycatch mortality. The NPFMC analysis notes “...if the halibut discard mortality rate can be measurably reduced, the effect on the halibut FCEY and the long-term exploitable biomass is the same as a reduction in actual halibut PSC use of the same percentage.”<sup>6</sup>

The current method to calculate the assumed DMR does not result in the most timely or accurate representation of halibut mortality. As it stands now, if a sector significantly reduced its DMR in a year, the resulting reduction in halibut mortality in that year (from an actual observed DMR change below the assumed DMR rate) would not be included in the calculation for the FCEY to the directed halibut fishery in the following year.

<sup>6</sup> P. 131, “Revise BSAI Halibut PSC Limits”, Initial Review Draft, January 19, 2015

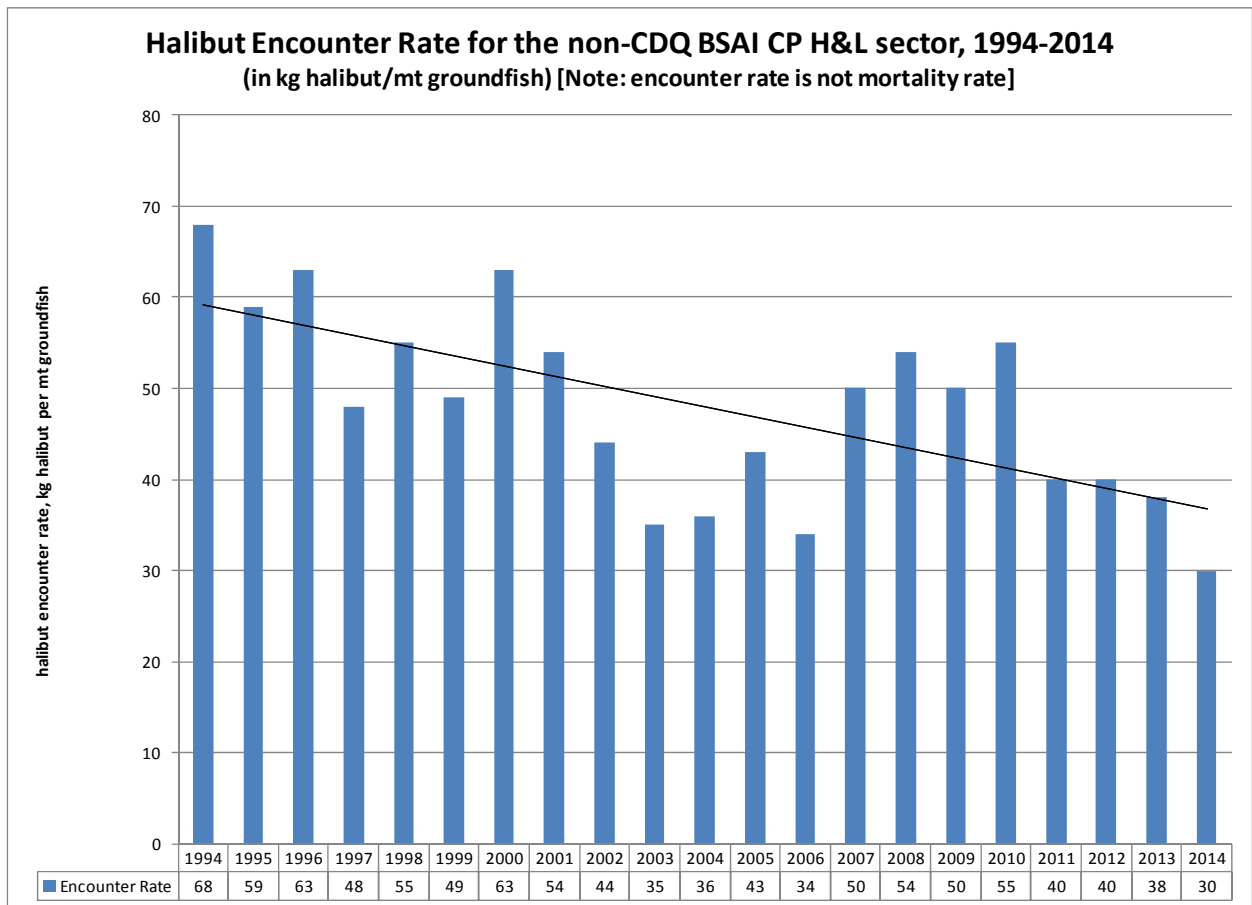
**Figure 4: Halibut Mortality from Assumed and Observed DMR**



**Figure 4** shows the difference between total halibut mortality calculated from the assumed and actual observed DMRs. From 2002-2014, the actual DMR was lower than the assumed DMR, so that actual mortality in the BSAI CP H&L sector was overestimated by +21% per year (or 87 mt per year).

As the CP H&L sector continues to reduce DMRs, the reductions may become incrementally smaller. It may be more appropriate and accurate to calculate assumed and actual DMRs to the tenth of a percent (rather than rounding up or down to nearest percent).

**Figure 5: Halibut Encounter Rate**



**Encounter Rate:** While the CP H&L sector has had success in reducing the DMRs, the sector has also had success in reducing the encounter rate. The encounter rate (kg halibut/mt groundfish) has been reduced **-41%** (from 1994-2014).

The encounter rate is kilograms of halibut encountered per metric ton of groundfish. To be clear, the encounter rate is not the mortality rate. Halibut mortality rate is kilograms of halibut mortality per metric ton of groundfish (encounter rate times DMR). Total halibut mortality is the result of multiplying the total encounter of kilograms of halibut by the DMR (% mortality).

While the encounter rate trend over time is downward, there is some variability in the encounter rate. In recent years, the rate is relatively stable (around 40 kg/mt) but was preceded by periods of higher and lower rates. The difference in yearly rates is due to the difference by month in halibut encounter rates and previous management strategies that resulted in the distribution of fishing effort into months with higher encounter rates.

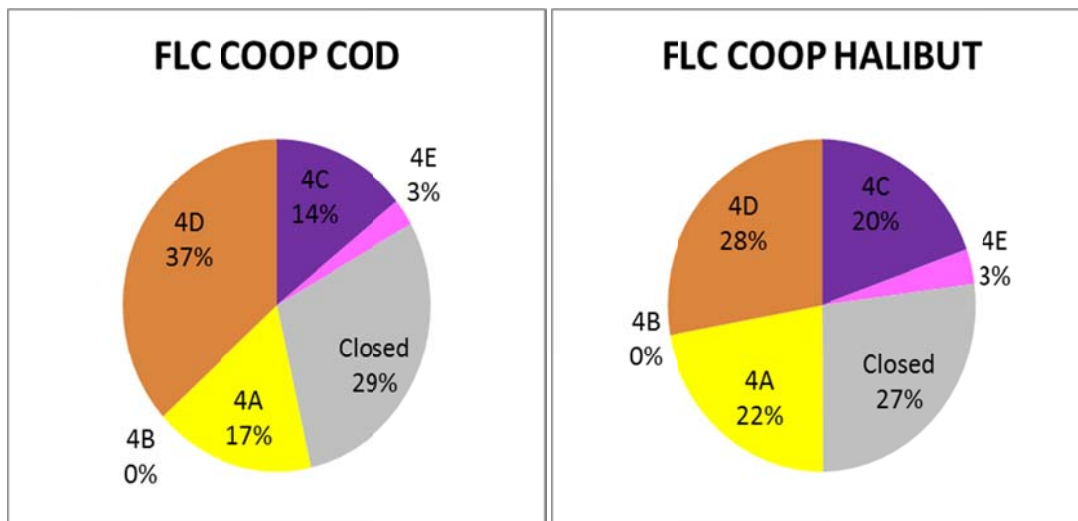
In 2008, Amendment 85 changed the A/B seasonal apportionment for fixed gear vessels >60' from 70%/30% to 51%/49%. This meant a larger proportion of harvest in the B season when the encounter rates for the CP H&L sector are the highest (September through December).

In 2010, with the implementation of coop management, the distribution of cod harvest is now more dispersed evenly throughout the year with an increased proportion of cod harvested in months with lower rates (within the limits of the 51/49 apportionment). Halibut encounter rates in the BSAI hook-and-line fisheries could be further reduced if the seasonal apportionment of p-cod was increased in the A season from the current 51/49.

**Spatial distribution of FLC catch**

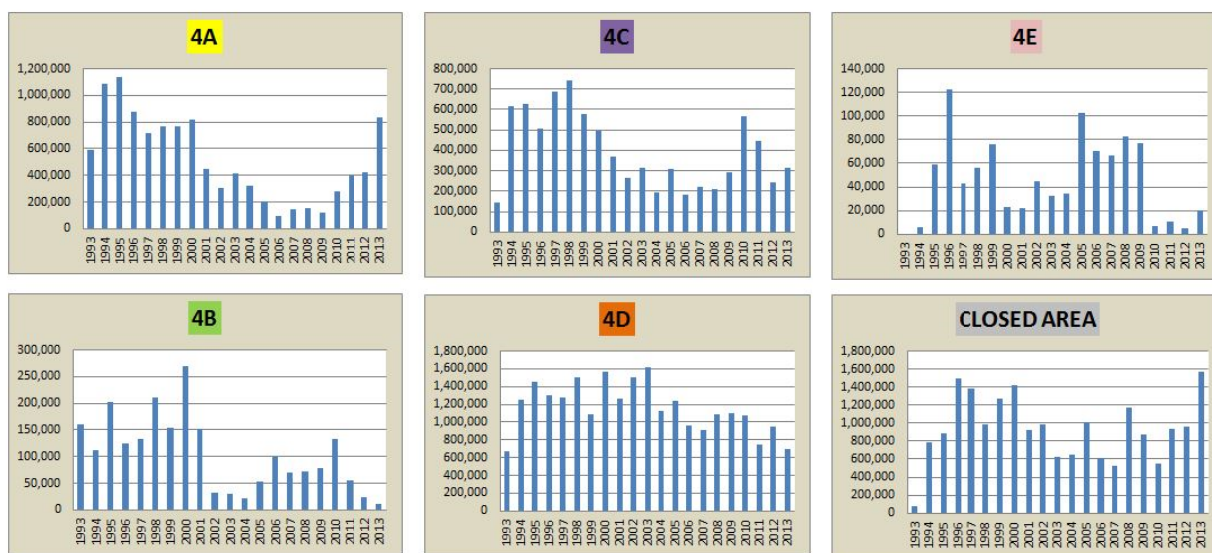
The CP H&L sector has a very broad distribution of groundfish catch and halibut bycatch without undue concentration in any one area (see NPFMC analysis, Figure 3-10, p. 52). In 2014, 54% of the cod harvest and 51% of the halibut bycatch occurred in Area 4CDE (FIS).

**Figure 6: Spatial distribution of CP H&L halibut bycatch in 2014, by IPHC Areas** (Source: FIS- Fisheries Information Services - from AFSC Observer Program spatial database).



In recent years, there has been a declining trend in halibut bycatch by the H&L sector in IPHC Areas 4C, 4D, 4E, and 4B. Correspondingly, there has been an increase in the H&L halibut bycatch in Area 4A and the Closed Area (Note: figures below are in kilograms of halibut encounters, not halibut mortality).

**Figure 7: Halibut Encounters by H&L sector in IPHC Area 4 and Closed Area (1993-2013)**



SOURCE: [http://www.afsc.noaa.gov/FMA/spatial\\_data.htm](http://www.afsc.noaa.gov/FMA/spatial_data.htm)

## **Additional considerations for Council review**

### **Differences in bycatch estimates between NMFS and the IPHC**

Similarly to differences noted between NMFS and the IPHC for total bycatch estimates in 2014, there are also differences in bycatch estimates for the BSAI hook-and-line sector. The IPHC estimate in 2014 for BSAI hook-and-line bycatch exceeds the NMFS estimate by 18%.<sup>7</sup> Currently sablefish is exempt and not included in the NMFS bycatch estimate. However, even if the bycatch attributed to the BSAI sablefish fishery by the IPHC is incorporated into the NMFS bycatch estimate, the IPHC bycatch estimate for the combined BSAI hook-and-line sector in 2014 (CP, CV, CDQ, and sablefish IFQ) is still **+8%** higher than NMFS. The IPHC 2015 Blue Book attributes these differences to IPHC extrapolations forward from October 25, 2014.

Combining the previously discussed over-estimation of mortality due to the use of assumed DMRs, and the over-estimate of mortality by IPHC mid-season extrapolation, it appears that the IPHC may have over-estimated actual halibut mortality in the 2014 BSAI H&L fishery (CV and CP including CDQ and IFQ sablefish) by as much as **+19%** (or 88 mt or 145,481 net lbs).

### **Changes in DMR Methodology**

The FLC was recently informed<sup>8</sup> that the IPHC is beginning to review the methodology in assessing halibut viability in DMR determinations, specifically the assumption of a 3.5% DMR for a released halibut with no injuries. If this estimate is revised upward by the IPHC, and DMRs are then consequently increased, this will significantly change the total mortality by the BSAI CP H&L sector and change all the historic total bycatch mortality estimates for all gear.

This revision to the DMR would also change the mortality estimates for the directed halibut fishery. As a consequence of that revision, the FCEY in the directed fishery may also need to be further reduced (if the actual DMR is higher than was previously assumed). IPHC staff indicated that halibut abundance estimates would also likely be retroactively adjusted to reflect the change in the DMR in all longline fisheries. This DMR revision would have a direct impact on estimating halibut PSC mortality in the BSAI hook-and-line groundfish sectors. The potential IPHC revision could confound the ability to meaningfully revise the PSC cap for the CP H&L sector.

For example, if the assumption for mortality of a released halibut with no injuries is doubled from 3.5% to 7% (and there are no other changes to viability rates), the assumed rate of 9% DMR would increase to 12.5% (an increase of 39%). This would raise the estimate of halibut mortality in 2014 from the CP H&L sector also by 39% from 395 mt to 549 mt. All historic estimates of hook-and-line bycatch would have to be revised and recalculated. If the revised methodology is uniform, the CP H&L sector would still be showing a declining trend in bycatch mortality but the starting position on the x-axis would be as yet undetermined.

Similarly, the IPHC is currently revising the estimates for halibut bycatch mortality in crab pot fisheries in Alaska. So far, the IPHC is still working on revising the previous estimate (1986-2011) for Area 3 (formerly 181 mt/year) and Area 4 (formerly 181 mt/year) for halibut bycatch in crab pot fisheries. For 2014, the IPHC finished revising the estimate in 2C for halibut bycatch in crab pot fisheries and then subsequently revised and changed the historic bycatch estimates for 2C in 2004-2013 as well as total bycatch for all areas for the same years.

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<sup>7</sup> P. 327, 2014 IPHC RARA, Table 7 and p. 58, IPHC Bycatch Report (9/8/2014).

<sup>8</sup> Personal communication with IPHC staff and FLC ED Chad See, 1/8/2015.

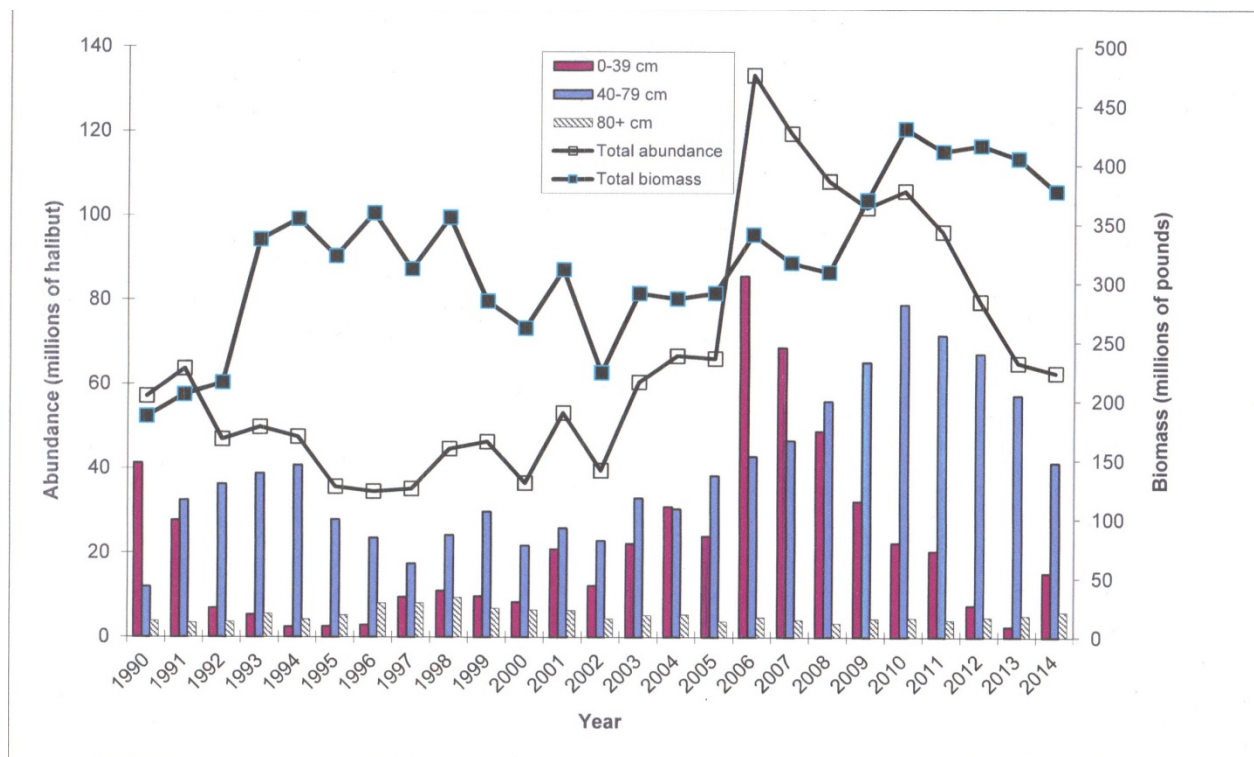


The IPHC review of DMR methodology and potential revision of historical bycatch estimates will make selection of an appropriate PSC cap level at this time problematic for the BSAI hook-and-line sectors. With the potential IPHC revisions to mortality as yet unknown, the analysis of the effect of potential cap levels on the longline sector will also be unknown.

What should be recognized is that the reductions that have been achieved by the FLC in reducing mortality, DMRs, and encounter rate in recent years have been driven less by the PSC cap but driven more by a genuine effort to fish in a responsible manner while minimizing bycatch to the extent practicable.

As already noted, the FLC has achieved significant reductions in mortality, DMRs, and encounter rates. These reductions were achieved during a time period in the Bering Sea when halibut total biomass has been increasing (Figure 8).

**Figure 8: EBS Halibut Biomass and Abundance (from IPHC 2014 RARA)**



**Figure 3. Estimated abundance of Pacific halibut by length category and total biomass as estimated by the NMFS Bering Sea trawl survey from 1990-2014, using swept-area estimates.**

**A commitment to continued stewardship by FLC**

The actions by FLC to date to minimize our halibut mortality have produced significant, incremental reductions by the FLC fleet. This includes in the past year when, as noted, we reduced our fleet’s halibut mortality by over **23%** and our mortality rate by over **33%** relative to our most recent 5-year average. Our intent is to continue with these voluntary efforts in the next year to further our responsible stewardship of the resource.

That said, it should be noted that, realistically, there is a practical limit to how much further we can reduce our PSC. As a result of our long history of reductions over time, future incremental reductions in halibut mortality will become increasingly more difficult to achieve and the

increments will be of a decreasing magnitude. However, the FLC will continue to strive for further reductions on a voluntary basis and is prepared to consider alternative measures, as needed, to continue our responsible stewardship of the resource. This may include a halibut PSC incentive program, discussed in some length in our June report to Council, hot spot avoidance measures, and increased monitoring that could facilitate additional reductions. Such actions, on paper, each offer the potential for additional reductions, but must be weighed against the practical realities of implementing the measures across the fleet specifically the impact of the actions on the conservation of other target and bycatch species, and whether the actions will result in improved reductions relative to the measures now in place by the FLC fleet. These are considerations we continue to explore with our Halibut Bycatch Committee so we may be ready to take action, as needed.

### **Other actions**

The FLC believes it is also important that Council begin to consider an action that would establish halibut PSC sector caps based upon and indexed to halibut biomass. This revision would appear to be a rational approach toward sharing the burden of conservation in years of low abundance while allowing sectors to jointly benefit from years where biomass numbers are strong and increasing. Implemented properly, and in context of potential changes to DMR under consideration by IPHC, this would seemingly provide benefits to all stakeholders, including western Alaskan communities that participate in and rely on operations by the FLC fleet as well as participants in the other sectors.

Thank you for your consideration of this important issue for the FLC. We look forward to talking with you further on these proposals. Please be in touch if you have any questions on this report or related matters. Thanks.

Sincerely,



Chad I. See  
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