

Members of the Council,

Thank you for taking the time to consider my comments. I support the council taking action on ABM in a manner that significantly reduces trawl bycatch of halibut, with option 4 or something close to it being the preferred alternative.

Alaskans Want to Invest and Work

I am a region 4 halibut and Bering Sea sablefish quota holder, and despite the somewhat negative outlook for halibut in that region am currently making additional investments in quota and fishing in the region. In part I am hopeful for the resources ability to recover because I believe that the council will do the right thing and limit bycatch wastage of halibut by the A80 sector. I have standing in this debate as someone fishing in the area, but I also know fisherman that are nervous about investing for the understandable reason that the stock has a recent history of decline and bycatch rates remain high. It is no secret that A80 bycatch of halibut is the largest cause of mortality for halibut in area 4CDE and could lead to directed fishery closures in that region, a terrifying consequence of bycatch combined with low abundance. Action by the council will send an important signal to the fisherman that comprise the future “recruits” to the industry that halibut bycatch is a concern that is being addressed

A80 Bycatch Kills Baby Halibut in the Halibut Nursery

The Bering Sea is a halibut nursery for the entire halibut stock and the establishment of the Bering Sea Closed Area in 1967 by the IPHC is just one piece of evidence that concerns around bycatch and mortality of juvenile fish in the Bering are longstanding. The anthropogenic mortality of these juveniles is overwhelming at the hands of the A80 bottom trawl sector which ironically still fishes in the IPHC Halibut Closed Area. As pointed out in the DEIS, “Bottom trawling within the Closed Area accounts for a significant proportion of the halibut mortality in the Bering Sea”. An area closure to bottom trawling is not an option before the council with this action but the hope is that by taking action to tie bycatch to halibut abundance the council can provide needed relief to the stock at times of low abundance and encourage the A80 sector to significantly reduce their bycatch wastage, a task they have shown themselves capable of. It is clear that the reduction of bycatch in the Bering Sea will accrue benefits to region 4 as well as the entire interconnected halibut stock. IPHC data shows that region 4 fish, especially juveniles, regularly emigrate from region 4 to region 3 and further, benefiting the ecosystem and all halibut consumers. During times before “Americanization” of the trawl fisheries, agreements were made that shielded the Closed Area from foreign bottom trawling and this corresponded with increasing halibut abundance. It is absolutely reasonable to think the ABM, especially option 4, will result in similar benefits over time even as A80 vessels continues to prosecute their fisheries in the area. As much as we need to take retrospective looks back several decades or more to understand where we are today, it is equally important to also look forward more than a few years for the potential benefits of this action on the ENTIRE halibut stock; I’m not sure the DEIS adequately does this.

A80 Bycatch of Baby Halibut is an International Concern

Canada, in halibut Area 2B, understands the risk to halibut stocks that bycatch of under 26” fish (U26) represents and has successfully lobbied for an upward adjustment to Canada’s halibut catch limits in order to account for loss of harvest opportunity due to the U26 bycatch in US

waters. This bycatch primarily occurs in the A80 sector and can be limited by the council with this action, which should strengthen the case for American negotiations in the future, a benefit to the nation. The U26 adjustment reflects a political reality in complex international fisheries management partnerships. The net result of it is further harm to Alaskan halibut fishermen, already harmed by A80 bycatch. The council is wise to recognize that our international partners are watching how we proceed here and that the international perception of the council's actions impacts Alaskan fishers.

A80 Bycatch is a State of Alaska Issue

It is increasingly clear that bycatch of halibut is an issue that many Alaskans are agitated about. I am personally concerned that the level of agitation could end up being a problem for sound management of our fish resources in the future if Alaskan stakeholders feel disconnected and overshadowed. I am of the very strong opinion that our management is excellent and exceptionally deserving of the public trust. Still, there is no denying that on one side of the A80 bycatch issue are small boat fishermen, subsistence users and sport fishers almost all volunteering their time to this process and on the other are paid attorneys and corporate lobbyists, highly educated and charging by the hour. This can create a confusing and concerning situation for some stakeholders and I think the comments by the EPA and Department of Interior partially concerned these issues of "plain language and clarity" as well as other issues. Also, I will say that many Alaskans would benefit from ABM and reduced halibut bycatch because they benefit directly or tangentially from halibut. Do you know any Alaskan, or anyone from any state for that matter, that goes out and fishes for Arrowtooth Flounder or Rock Sole for subsistence or sport? A80 has built a huge business targeting the fish that "nobody wanted". The benefits of the fishery flow largely to corporate interests in Seattle. I have many friends in the Seattle area yet none of them directly or indirectly benefit from A80 fisheries. The social experience in coastal Alaskan communities is very different, and meeting people who benefit directly or indirectly from halibut commercial, subsistence and sport fisheries is exceedingly easy. The importance of these community characteristics to the decisions around ABM are multiplied when one includes the impacts of A80 bycatch on Bering Sea coastal communities making the social justice and small business issues with halibut bycatch even more alarming and definitely far too large to ignore. The DEIS correctly states that A80 corporations are not small businesses, but it does not give enough weight to the social justice issues and cultural significance in Alaskan communities that are impacted. The negative impacts of this bycatch rest primarily with Alaskans and the DEIS incorrectly does not assert that reduction of bycatch is a benefit to the nation. It should assert this national benefit for at least three reasons, one is the social justice and coastal heritage issues mentioned, another is the longstanding understanding between the federal government and the state that inherent in statehood is the need for Alaska to be able to support itself with its natural resources and the third is that it is likely that A80 can harvest their fish while reducing bycatch, meaning the bycatch reduction is a categorical benefit.

A80 Attorneys Make Specious Arguments Around Global Warming and Science

I won't go too into detail on this but the fact that A80 attorneys are submitting comments implying that halibut bycatch may increase due to climate change should make everyone's hair stand on end, not because it is wrong but because it might be true, and yet the same attorneys show no concern for the health of the currently low abundance halibut stock in their comments. In fact, they literally speculate that ABM isn't supported by sound science. You cannot

simultaneously argue that the impacts of future climate change needs to better taken into analysis and honestly argue against a policy that minimizes bycatch at times of low halibut abundance given the uncertainty presented by global warming. That global warming might change fish population dynamics and fish locations makes it all the more important that we emphasize longitudinal data in council decision making such as the IPhC longline survey and Bering Sea trawl survey data to watch for trends and protect against overfishing and bycatch in a changing ocean.

Who benefits?

You need look no further than who is testifying in support of the action- conservation minded Alaskans and who is testifying against- corporate interests. A80 bycatch of halibut feeds attorneys, corporate interests and lobbyists. Reduction in the bycatch feeds fishermen and families which is why we are testifying to you and volunteering our time. I imagine these concerns are also why you council members are involved in the process and I so appreciate your work. I realize my comments have ranged widely and apologize for any lack of focus or inconsistencies but when I see A80 attorneys using terms like “magical thinking” to criticize the agency in its efforts to meet national standard 1, I at least feel like I am in the solid company of those attorneys if any of my arguments prove specious. Unlike the attorneys however, I and other Alaskans do not get paid for creating these comments, our interest is in the perpetuation of the beautiful halibut fishing tradition, the bent fishing pole and the smiles it brings- an experience we gladly pay for.

I sincerely thank you for your time. This is an important issue for the future of myself, my family and all our local Alaskan coastal communities.

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11.28.21