

September 28, 2018

Mr. Bill Tweit, Interim Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

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

RE: C6 BSAI Halibut Abundance Based Management of Prohibited Species Catch Limits

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

Thank you for taking comment on the Preliminary Review Draft of the BSAI Halibut Abundance-Based Management (ABM) of Prohibited Species Catch (PSC) Limits.¹ In the last 15 years, an estimated 107 million pounds of halibut have been killed as bycatch in the federal groundfish fisheries in the Bering Sea.² It is time to implement measures for reducing and reallocating the privilege of halibut bycatch within the groundfish fleet. We understand that the Council may revise Alternatives to the ABM review during the Oct 2018 meeting. We support action to provide for sustainable fishing opportunities, reduce the waste of bycatch, and protect fish populations particularly when at lower levels of abundance.

The Council and NMFS should pursue alternatives that ultimately reduce halibut bycatch. Groundfish fisheries have a large impact on the halibut population through this wasteful bycatch. Estimates for the loss of yield for the directed halibut fishery due to bycatch in the groundfish fishery have ranged from 1 to 4 pounds of lost yield for every pound of halibut bycatch mortality in the Bering Sea.^{3,4,5} There is a direct link between halibut PSC and the amount of halibut available to directed halibut fisheries; the directed fisheries are allotted whatever is left over from the Total Constant Exploitation Yield (TCEY) after the halibut PSC is subtracted. Ideally, the proportion of directed use (Fishery Constant Exploitation Yield, FCEY) should be greater than what can be discarded in other groundfish fisheries. However, total halibut bycatch mortality was almost twice the total directed halibut fishing removals in Area 4CDE in 2017 (62% compared to 38%).⁶ This is because the directed halibut fishery has carried the burden for

¹ http://meetings.npfmc.org/CommentReview/DownloadFile?p=442257dd-edc0-4001-a464-d0812ad9f760.pdf&fileName=C6%20Halibut%20ABM%20PSC%20Limits_PrelimRev_0918.pdf

² See "Halibut Bycatch Rates – by gear, area, target, week, processing sector" reports by year: <https://alaskafisheries.noaa.gov/fisheries-catch-landings>

³ Sullivan, P. J., R. J. Trumble, and S. A. Adlerstein. 1994. Pacific halibut bycatch in the groundfish fisheries: effects on and management implications for the halibut fishery. International Pacific Halibut Commission, Seattle, WA, No. 78.

⁴ Clark, W. G., and S. R. Hare. 1998. Accounting for bycatch in management of the Pacific halibut fishery. *North American Journal of Fisheries Management* 18(4): 809-821.

⁵ Adlerstein, S. A., and R. J. Trumble. 1998. Pacific halibut bycatch in Pacific cod fisheries in the Bering Sea: an analysis to evaluate area-time management. *Journal of Sea Research* 39: 153-166.

⁶ IPHC. 2018. Final Pacific halibut catch tables for 2018. International Pacific Halibut Commission IPHC-2018-AM094-11 Rev_1, 21 p.

reducing fishing mortality when the halibut population declines while the PSC caps for the groundfish fleet have stayed static. ABM alternatives must reduce halibut bycatch mortality, including reducing bycatch mortality to 0 when necessary to avoid overfishing and rebuilding of the halibut stock.

We recommend the Council revise and prioritize the objectives articulated in the purpose and need statement to better reflect both the impetus behind this action and information acquired during scoping:

1. Provide for the growth and recovery of the halibut population.
2. Protect the halibut spawning stock biomass, especially at lower levels of abundance.
3. Index halibut PSC limits to halibut abundance.
4. Ensure sustained directed halibut fishing operations in the Bering Sea.
5. Retain flexibility in proportion of PSC limit allocated to the groundfish fishery when halibut abundance is high.

We suggest dropping the objective to “provide for some stability in PSC limits on an inter-annual basis” and Element 1 from each of the Alternatives prior to analysis. Element 1 defines a limited range for the PSC limit based not on the abundance estimates from the trawl survey or the setline survey but rather on the prior year’s limit. This could be unnecessarily constraining on PSC calculations, and we urge the Council to instead prioritize an objective to “provide for growth and recovery of the halibut population.”

Additional options for thorough analysis should include a set of lower fixed PSC caps, recommended by the Science and Statistical Committee (page 11 of the review). This would aid in evaluating the effects and performance of the ABM alternatives on meeting the objectives of the action, and would allow a comparison of year-to-year changes in PSC limits. A simple alternative could set a specific allocation percentage for the TCEY which would be kept static by adjusting the PSC limit each season.

Finally, the Council should consider an alternative for spatial management measures including protected areas to reduce halibut bycatch, protect juvenile halibut, and prevent localized depletion. A rational candidate area for this approach would be the Halibut Savings Area (Figure 1). The Halibut Savings Area is closed to directed halibut fishing by the International Pacific Halibut Commission to protect juvenile halibut and has been closed by the NPFMC to foreign trawling in the past because of bycatch concerns. Ironically, the groundfish trawl fisheries are permitted to trawl in this protected area and have killed millions of juvenile halibut during this steady decline of halibut abundance. NMFS statistical area 509, within the Halibut Savings Area, has the highest halibut bycatch in the Bering Sea. From 2004 to date, halibut mortality in area 509 is an estimated 33 million pounds.⁷ Comparatively, other areas within the Bering Sea in that same time span contributed, on average, 5 million pounds. An alternative or option that limits trawling in the Halibut Savings Area should be included in this action.

⁷ See “Halibut Bycatch Rates – by gear, area, target, week, processing sector” reports by year:
<https://alaskafisheries.noaa.gov/fisheries-catch-landings>

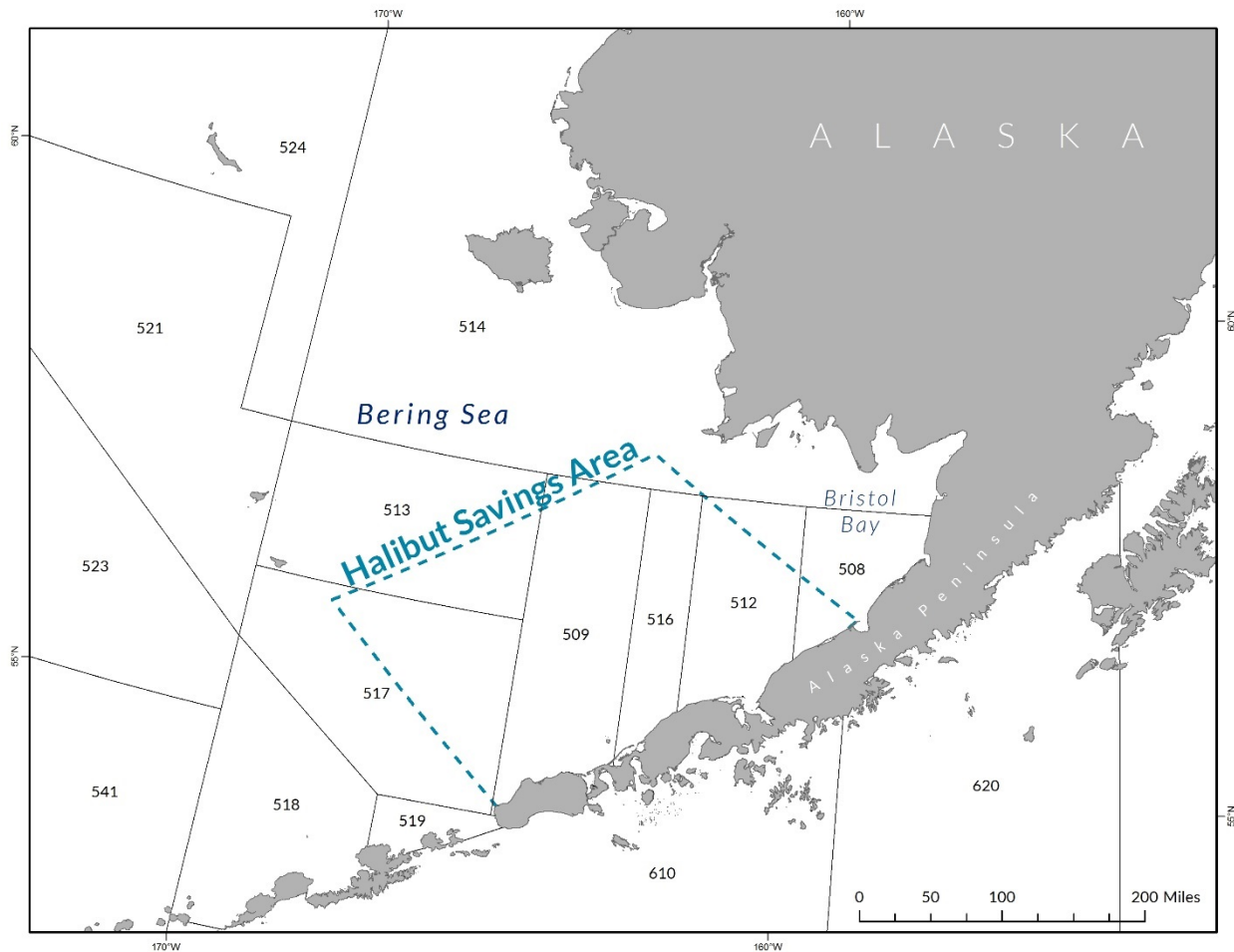


Figure 1. The Halibut Savings Area in the Bering Sea. Shown also are the NMFS statistical areas. Area 509, which lies within the Halibut Savings Area, had the highest halibut bycatch for the statistical areas in the Bering Sea.

We strongly encourage NMFS and the Council to expeditiously implement management measures that reduce halibut bycatch and are responsive to spatial concerns and trends in the halibut population. We look forward to continuing to work with you for healthy, sustainable fisheries that count, cap, and control wasteful bycatch.

Sincerely,

Susan Murray
Deputy Vice President, Pacific
Oceana