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September 29, 2021

Chairman Simon Kinneen
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

RE: C4 BSAI Pacific cod Trawl Catcher Vessel LAPP

Dear Chairman Kinneen, Dr. Balsiger and Council members:

Ocean Conservancy¹ submits the following comments to the North Pacific Fishery Management Council (Council) regarding Final Action on C4 BSAI Pacific cod Trawl Catcher Vessel LAPP. At this meeting, the Council is poised to adopt a catch share program for the Bering Sea Pacific cod trawl catcher vessel sector. Any catch share program brings with it risks and benefits to Alaska fishing communities, fishery participants, habitat and bycatch. Our comments are specifically focused on the bycatch impacts of this action. Should the Council choose to move forward with a catch share program for the BSAI Pacific cod catcher vessel sector, we recommend the following regarding Elements 3 and 14:

Element 3: Prohibited Species Catch Limits

Include a 35% reduction of halibut Prohibited Species Catch (PSC)

National Standard 9 of the Magnuson-Stevens Act mandates that conservation and management measures minimize bycatch to the extent practicable. Catch share programs provide substantial tools for reducing bycatch, and meaningful bycatch reductions should be included in this program. A 35% reduction will provide the greatest benefit to the halibut resource and halibut-dependent communities.

Recent data (Table 2-105; p.99) suggests the fleet can operate without constraint at a 35% reduction of halibut PSC. The contributing factors attributed to the reductions in halibut PSC in 2021 included refraining from fishing at night, gear modifications, voluntary stand-downs, voluntary coop arrangements, and coordinating deliveries with processors. A comprehensive cooperative program should include

¹ Ocean Conservancy is a non-profit organization working to protect the ocean from today's greatest global challenges. Together with our partners, we create science-based solutions for a healthy ocean and the wildlife communities that depend on it.

additional means to reduce bycatch such as 100% observer coverage, individual accountability, the ability to choose when and where to fish, transfer of PSC between coops, and increased spatial distribution.

Reducing halibut bycatch by 35% is practicable: the BSAI Pacific cod trawl fleet operated under a voluntary cooperative harvest plan for two seasons, 2020 and 2021, and successfully reduced halibut bycatch well beyond this level of reduction. Even under higher TAC's of Pacific cod, the fleet has demonstrated they can successfully operate under a 35% reduction.

Include specific and meaningful reductions of at least 35% for crab PSC

There should be at least a 35% reduction of crab bycatch in the program in order to immediately address struggling Bering Sea crab stocks. Coastal communities are dependent on halibut and crab, and it is the responsibility of the State of Alaska and the Council to conserve these resources and their cultural, recreational and commercial values to Alaskan fishermen, processors, visitors and consumers alike.


Element 14: Gear Conversion

Include gear conversion as outlined in Element 14 to allow the use of pots to harvest cooperative quota

Gear flexibility provides the potential to increase product value, reduce habitat impacts and reduce halibut bycatch. While there are real concerns regarding crab bycatch in pot gear (as stated above), we support 100% observer coverage on the pot vessels harvesting cooperative quota and urge the cooperative and Council to continue to develop gear modifications to minimize crab bycatch as well as track crab bycatch real-time in the sector.

Thank you for your consideration of our comments.

Sincerely,



Rebecca Robbins Gisclair
Sr. Director, Arctic Programs