

November 30, 2021

Simon Kinneen, Chairman  
North Pacific Fishery Management Council  
Anchorage, Alaska

Submitted electronically

Regarding: C2 – Halibut Abundance-Based Management

Dear Mr. Kinneen and members of the Council:

We, the undersigned Alaskans, strongly support meaningful reduction in halibut bycatch, and for the upcoming Council meeting, that means we strongly support Alternative 4 – the only of the four abundance-based management (ABM) of halibut bycatch alternatives before the Council that would provide any meaningful reduction to halibut bycatch and therefore any meaningful benefit for Alaska’s halibut fisheries.

Never before have Alaskans from all regions and sectors come together in this way to support Council action to protect our fisheries and communities.

## **BACKGROUND**

Alaska is famous for its bountiful fisheries resources, including salmon, halibut, crab, sablefish, and herring. It is also well-known for its sustainable stewardship of fisheries resources. For more than half a century, with inevitable fluctuations, the resources off our shores have been successfully managed, and have provided food and livelihoods for our people and communities.

However, one of the most iconic and valuable of our resources – Pacific halibut – is facing a crisis that threatens the way of life for commercial and sport halibut fishermen, and the economic driver for halibut-dependent communities throughout coastal Alaska.

The Bering Sea (BS) halibut fishery has been crippled by the devastating direct effects of bycatch by large factory trawlers that come north from Seattle to fish for various groundfish species, which are processed at sea and primarily exported to Asia. Bycatch and discard of halibut during those BS groundfish fisheries also affects the availability of halibut to all users throughout the species’ range.

Halibut stocks have declined substantially over the past 30 years. As halibut stocks declined, bycatch mortality consumed a larger and larger share of the available halibut. Bycatch mortality – dead halibut – is “taken off the top” by the managers at the International Pacific Halibut

Commission (IPHC), and the commercial and sport (“directed”) halibut fisheries get whatever is left.

This is unfair to Alaska and Alaskans.

Bycatch limits must be reduced for Alaska-based commercial and sport fisheries to survive. The future of halibut IFQ holders, sport charter operations, and communities hangs in the balance.

### **HERE ARE THE FACTS:**

- **Every Alaskan pays the price for bycatch.**
- Since 2015, trawlers have killed and discarded more than 3.1 million halibut in the Pribilof Island area of the Bering Sea (Area 4CDE). This is eight times more halibut than the Pribilof Island halibut fishery landed, based on mean weight. At an average price of \$5.10 per pound, this amounts to \$56 million in ex-vessel revenue lost by local halibut fishermen and fishing communities in the Pribilof Island area alone.
- For 2021, the IPHC projects that **bycatch will account for 63% of all halibut removals** in Area 4CDE, based on the 3-year average of bycatch mortality. The directed fishery landings will receive only 35%.
- If bycatch users take their current full limit, **bycatch would account for 97.5% of halibut removals in Area 4CDE.** The directed fishery would receive just 1.7%. This means bycatch users would receive more than 5 million pounds of halibut, leaving only 90,000 pounds for the halibut fishermen.
- There is a **net migration of halibut from the Bering Sea to the Gulf of Alaska**, hence halibut bycatch directly affects all who depend on halibut in the Gulf as well as the Bering Sea.
- The recent average annual catch limit for the **entire** Southeast Alaska commercial halibut fishery is LESS than the annual Bering Sea halibut bycatch.
- In Southcentral ports like Homer and Kodiak, **commercial and sport harvest of halibut has declined by more than 50% since 2010** to conserve the halibut resource, while halibut bycatch limits have stayed the same.
- Sport charter operations in all areas of Alaska have reduced allowable halibut size, or lost one or more charter days **per week, with each lost day** representing thousands in lost revenue to that small business alone, along with associated tax income to the community, and related local expenditures by the businesses and their clients.

- Each time an Alaska business or community loses income as a response to halibut stock changes, those **businesses and communities financially subsidize the trawl fleets, whose halibut bycatch is guaranteed.** This subsidy is inequitable, unsustainable and is not supported by Alaska's fishermen, fishing businesses and communities.
- Bycatch savings through implementation of an ABM program may provide meaningful differences in annual allocation to the sport sector.

## **ACTION NEEDED**

NPFMC is currently considering an ABM system for the Amendment 80 sector (bottom trawlers) that would tie bycatch limits to halibut abundance, with final action on Halibut ABM at its December meeting. ABM means that as the halibut resource rises or falls, the limits on bycatch by the bottom trawl sector would rise or fall, as the catch limits do for the directed halibut fisheries.

**We strongly support Alternative 4 – the only alternative being considered that would provide any meaningful benefit to the directed fishery.**

Alternatives 2 and 3 do relatively little to reduce the bottom trawlers' bycatch limits at low levels of halibut abundance, and offer insignificant improvement from the status quo.

Meaningful ABM creates badly needed conservation incentives. These incentives are lost entirely under the current non-constraining PSC limits because groundfish trawlers feel no effects from low abundance — and have no incentive to reduce halibut bycatch or take steps to conserve the halibut resource — because the impacts of low abundance are borne entirely by halibut commercial and sport fishermen.

**We ask — and expect — the State of Alaska to use its leadership position at the NPFMC to select Alternative 4.**

Alaskans believe in wise resource management and protecting the fisheries that Alaskans rely on. We ask that the State of Alaska take a leadership position in advancing these principles and selecting Alternative 4.

Sincerely,

Caleb Martin, Rio Barkhau, Andrew Thoms, Maite Lorente Rial, Katie Riley, Bethany Goodrich, Jedediah Delong, Heather McCarty, Kelsey Hansen, April Woods, Sylvia Maiellaro, Martha Siebe, Janet L. Rhodes, Joseph D'Arienzo, Kurt N. Hansen, Tad Fujioka, Don Rees, Susan Vogt, Becky Breeding, Elizabeth Blankenship, Jacob Richards, Brittney Salazar, Marybeth Holleman, Moses P. Johnson, Kyle Knight, Gary Egerton, Tyler green, Keri Stout, Lance Preston, Jeff Sloss, Annick Jeffroy, Charlie Wilber, Brett Collins, Casey Knight, Terry Cummings, John Knight,

Rebecca Knight, Karsten Wood, John W. Skeelee, Jay Simerka, Mathias Weibel, Colin Tyler Bogucki, Margaret McGinnis, Stuart Weathers, Kelly Harrell, Jody Mason, David Bayes, Victoria O'Connell Curran, Richard Curran, Chandler O'Connell, Fay Ondelacy, Kylee Jones, Garry Greenwalt, Lori Murray, Erik Velsko, Jeremiah Williams, Charlie Wilber, Hunter Keogh, Kaylee Keogh, Charles Carleton, Steven G. Smith, Bill Iverson, Misty Holcomb, Gary Canterbury, Wesley A. Canfield, Sterling Lyman, Logan Snyder, Aaron Donham, Jackson Wilder, Russell Knight, Brandon McGuire, Charles Mincher, Randy Moreau, Dollynda Phelps, Jerry Foster, Dennis Smith, Daniel Beeg, Anthony Celia, Michael Duff, Sidney Shell, Gary Galbraith, Lynn Keogh, Sean Conley, Linda Gorman, Doran Lee, Matthew Faris, Ben Oien, Richard Bucy, Dr. Ronald E. Dick, Donald Alsup, Lione Clare, Mike Cronk, Dustin Renner, Steve Wuergler, Robert S. Jackson, Jason Media, Terry Shaffer, Amy Fredette, Craig Burns, Marvin Head, John Johnson, Anne Humphrey, Jayme Schroeder, Alan Damkoehler, James Moody, Lloyd Gossman, Pamela Wittanen-Moss, Trakker Young, Michael A. Kampnich, Katie Rooks, Josh Cox, Robert Mathews Jr., Charles Snyder, Natalie Sattler, Phil Goebel, Audrey Beam, Brandon Hicks, David Bernier, Tav Ammu, Aron Schrepfer, Riley Peck, Steve Babinec, Capt. Bob Candopoulos, Tim Berg, Gloria Simeon, Dixie Banner, Thomas Brewer, James Singleton, Colin Singleton, Steve Neff, Amber Gall, Elizabeth Freeman, Elizabeth Coquillard, Shannon Schoenhardt, Howard Driskell, Daniel Webb, Tyler Soety, Jerri Bates, Courtney Rommes, David Newlon, Dustin Logan, Ryan J. Horwath, Craig Persson, Mark S. Guillory, Travis Smith, Jeremiah Johnson, Travis Barber, Carol Shade, Hahlen Behnken, Jada Rajala, Meghan Trupp, Richard Shore, Dan Bair, Jeanette Oien, Leslie Law, Tawny Nesmith, Paul Pribyl, Will Samuel, Sherry Aitken, Sandra Holder, Robbie Kerr, Wayne Marvin, Dan Pauk, Therese Elliott-Harvey, Sadie Tabolt, Natasha Parent, Diana Yurkova, Garrett Kavanaugh, David Harris, Luther Anderse, Bethany Anderse, Terry Cummings, R.R. Mier, Carol Fuller, Evelyn Trevethan, R.H. Willett, Clarice Johnson, Peter B. Melde, Amy Rowe, Lauren M Divine, Jason E Gjertsen, Frances Alderson, Peter Mjos, Mike Shields, David Beebe, Madison Kosma, Lin Davis, Woody Cyr, Steve Fish, Eva Fish, Kari Johnson, Robert Proulx, Brett Zaenglein, J. Carlos Schwantes, Karen L. Johnson, Hannah moody, Charles E. Wood, William Flor, Silas Flor, Jeff Robinson, David Gifford, Charles Bingham, Dylan Swanberg, Eric A. Grundberg, Shannon Tibbs, John Williams, Bart Meyer, Carolyn Nichols, Scott Cassedy, Paul Rioux, Michele Metz, Sarah Stevens, Nina Maus, Bernadette Angus, Ricco Mulligan, Tom Schiesser, Mark Severson, Karen Severson, Sommers Cole, Tony Arsenault, Thomas Emerson, Ricardo Mercurief, Patrick Lane, Bonna Andersen, Susan Bierria, Albert J. Bierria III, Charles Clement, Breanna Miethe, Gregory Cushing, Aaron Severson, Christopher Clinton Tran, Dugan Daniels, Kenneth Pleasants, Matthew Faris, Jeremy Robida, Ryan Morse, Capt Steve Babinec, Michael L. Schoessler, Alexis Kwachka, Terry Perensovich, Elizabeth Peterson, Charlie Peterson, Neil Lee