



# Alaska Longline

## FISHERMEN'S ASSOCIATION

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Dear Chairman Kinneen and Members of the Council,

I am submitting these comments on Agenda Item C-2: BSAI Abundance-Based Management of halibut PSC on behalf of the Alaska Longline Fishermen's Association (ALFA). Many of our over 200 members rely on access to and income from the halibut resource and, in turn, contribute to food security and generate economic activity in the rural communities in which our members live.

Before focusing on specifics, ALFA cautions the Council against taking action at this meeting to identify a preliminary preferred alternative. Despite being weary of the delays and anxious for bycatch reductions, we are concerned by the identified issues with the simulation model and the continued use of that model by the analysts to reach conclusions relative to impacts of the alternatives. Until the model is corrected to consistently and more accurately reflect dynamics of the halibut stock, ALFA maintains that the model does not provide an adequate basis for decision making. We would remind the Council that the IPHC has recently completed an MSE model that does incorporate the best available science on halibut stock dynamics; this model may provide both a more robust and a more expedient basis for AMB decision-making and we support the Council's use of this model. Should the Council choose to move ahead despite concerns expressed by stakeholders and, in the past, by the SSC, ALFA supports Alternative 4. Of the options, we support only option 3, develop an incentive program, and suggest as we have in the past that the incentive program be based on 026 (over 26 inch) halibut bycatch.

### **Introduction**

As the Council is aware, ALFA has been involved in the effort to establish abundance-based management for the halibut bycatch fisheries since 2015. The effort was launched simultaneous to the Council reducing bycatch caps but reducing them by far less than resource abundance had declined since the caps were set. At the time, Council members defended the limited reductions by stating additional bycatch reductions would be achieved through an abundance-based approach. While identifying the index for that abundance-based approach has proven far more challenging than we initially anticipated, the goal of bycatch reduction has

only become more important. Bering Sea communities and halibut fishermen remain at risk of complete resource preemption, and the resource remains at risk until the Council acknowledges conservation responsibility for halibut killed in the groundfish fisheries. We remain fully committed to this process and to improving conservation and management of the halibut resource.

### **Resource Conservation**

In October 2019, NOAA Deputy Assistant Administrator Sam Rauch addressed the North Pacific Council on the topic of abundance-based management of halibut PSC. At that time, Mr. Rauch reminded the Council that conservation is broadly defined in the Magnuson-Stevens Act to include sound management principles, such as setting fishery limits based on stock abundance. The North Pacific Council manages fisheries based on abundance to promote conservation, recognizing that management uncoupled from conservation risks overfishing. **In short, there are clear and inarguable benefits of abundance-based halibut PSC management that should be clearly acknowledged by the Council and in the documents supporting your decision.** Claims made in the analysis that this action does not include conservation benefits take an overly narrow view of conservation.

As the Council may be aware, the International Pacific Halibut Commission has transitioned to managing the halibut stock using a Spawning Potential Ratio (SPR) that takes into account all halibut mortality, including the mortality of juvenile halibut killed in the trawl fisheries. The SPR ensures that harvest rates on mature halibut are adjusted to maintain an overall target fishing intensity, hence directed fishery harvests are adjusted downward to account for trawl mortality of juvenile halibut. This SPR management protects the spawning biomass against bycatch impacts—but does so at the expense of the directed halibut fisheries in the Bering Sea, Gulf of Alaska, British Columbia and lower 48. **In other words, the directed halibut fishery is the conservation buffer between halibut bycatch and the spawning biomass—a buffer that works until the directed fishery is gone.** To claim bycatch does not have an impact on the spawning biomass is to ignore the conservation buffer demanded of the directed fisheries—and to ignore the “borrowing” of halibut from the Gulf built into the simulation model at bycatch levels that exceed harvestable halibut biomass levels in the Bering Sea under low abundance scenarios. This situation occurred in the real world in 2015 when bycatch in the Bering Sea was projected to exceed available biomass and IPHC managers signaled intent to reassign Gulf biomass to the Bering Sea—and preempt the directed fishery for the year. Amendment 80 corporations volunteered to reduce bycatch, which sidestepped the crisis for that year. Nevertheless, the situation for the directed fishery and the Bering Sea communities remains precarious in the real world and in the simulation model.

ALFA recognizes that halibut are a coastwide stock, hence recruitment from the Gulf may function to restore Bering Sea halibut stocks. That said, there are regional stock distribution considerations that should raise concern relative to “borrowing” Gulf halibut to backfill for Bering Sea bycatch; there are also internal inconsistencies in the simulation model relative to the model’s treatment of halibut as a coastwide or Bering Sea only stock. As just described, the model relies on the coastwide aspect of the halibut stock when dismissing regional impacts; on

the other hand, the model ignores benefits of bycatch reductions to halibut fishermen and communities in the Gulf of Alaska when identifying trade off ratios between bycatch reductions/increases and the directed fisheries. Because more of the impacts associated with juvenile halibut bycatch are felt “downstream” of the bycatch area, the simulation model’s non-coastwide focus relative to Gulf directed fishery benefits underestimates both the impacts and the benefits of bycatch reductions. The Bering Sea only boundaries to this aspect of the evaluation are in direct conflict with model’s coastwide treatment of the stock relative to replenishing Bering Sea stocks from the Gulf. In short, **the model should treat the halibut stock as a coastwide stock or not—but that treatment should be consistent throughout the model parameters.**

As the SSC pointed out in October, the simulation model is also inexplicably optimistic about halibut abundance trends. For example, the trawl index is projected to increase 3-4 times from current levels and under no scenario, if we are correctly understanding the SSC discussion, is abundance simulated to decline significantly. We see nothing in the IPHC projections of halibut stock trends to substantiate these optimistic model results. In fact, IPHC halibut projections forecast a slight uptick followed by decline or low and stable. As halibut stakeholders, we cannot understand the basis for the optimistic scenarios—but we can understand that they are contributing to erroneous conclusions relative to the alternatives and the anticipated impacts.

### **Understanding the impacts of the Alternatives**

The shortcomings of the simulation model have major implications for the analysis of the alternatives. Specifically, we question the following analytical conclusions that are highly dependent on simulated abundance:

1. The probabilities of being at various PSC levels in the lookup table (Table ES-3).
2. The ratios of BSAI directed catch limits to PSC limits (Table ES-5).

In October, we understood that the Council did not intend to use the simulation model as the basis for decision making, and that instead a more traditional analysis would be conducted. That no longer seems to be the case. Since the Council seems to be proceeding with the analysis that relies on model simulated results, ALFA cannot support use of the model until the SSC identified problems with the model are addressed. At the very least, we believe the MSA mandate to use the best available science would dictate corrections to the simulation model. These corrections must include realistic halibut abundance scenarios, internal consistency relative to treatment of the halibut stock and fisheries as coastwide vs. regionally defined, and the correct ratio between bycatch mortality changes and the directed fishery response.

As stated in a joint letter submitted to the Council last week, the Council may also have the opportunity to test alternatives using the MSE model constructed by Dr Allan Hicks. The MSE model more accurately captures coastwide stock dynamics and, we understand, could be tuned to test bycatch impacts. From our perspective, this model offers a solid basis for the Council’s decision-making and might serve to inspire the shared commitment to halibut conservation and management between the two governing bodies that was the focus of the joint letter. **We urge**

**the Council to request that the IPHC conduct a bycatch impact analysis using Dr. Hicks MSE model or that the AMB workgroup use Dr. Hicks' MSE model to test halibut bycatch ABM alternatives.**

### **The Alternatives**

ALFA members are eager for the Council to complete its work on halibut ABM and reduce halibut bycatch. That said, we do not consider the analysis, nor the simulation model that informs it, to adequately capture the impacts and benefits of the various alternatives. Should the Council choose to forge ahead despite these concerns, ALFA strongly supports Alternative 4 as best meeting the Council—and the Nations—objectives relative to resource conservation, social equity, and environmental justice. More specifically to the MSA National Standards, ALFA would emphasize National Standard 8 responsibilities and highlight from the SIA that 9 out of 17 Bering Sea communities that once participated in the halibut fishery have lost access and others are continually in jeopardy. These communities do not have access to salmon and rely heavily on halibut for cultural as well as social and economic well-being. The Council needs to weigh this loss and the community stress imposed by the existing prioritization of bycatch against National Standard 1 and 4. Likewise National Standard 9 should weigh heavily on the Council's shoulders. The "extent practicable" to which bycatch can be reduced should not be defined by an industry that is thriving at the expense—and in some cases elimination—of historic and traditional fisheries.

There are glaring social equity issues underlying the ABM decision that we expect are clear to the Council: on one side, over 2000 halibut fishermen, rural communities, indigenous dependence, and a small-scale fishing industry that is one of few long-term success stories in fisheries management vs 5 factory trawl corporations and 18-20 industrial fishing factories (page 100). In the Bering Sea alone, 586 vessels participate in the Area 4 halibut fishery and of those 523 are Alaska owned (p. 162). The rural and indigenous fishermen who rely on the halibut resource from Ketchikan to St Paul are critical to local food security, community health and regional economic activity. These small boat fishermen are limited geographically and economically. Bottom trawling is high impact on benthic communities and, given the Council's prioritization of bycatch, extremely high impact on Alaska's coastal fishing communities; evidently bottom trawling is also a contributing factor to ocean acidification and climate change.<sup>1</sup> The Council can mitigate that impact through abundance-based PSC management that balances resource conservation at low abundance levels, instead of resting the full conservation responsibility on the directed fishery. Alternative 4 is clearly the alternative most likely to reach that balance.

### **Conclusion**

In closing, ALFA strongly supports abundance-based management of halibut PSC and we are eager for final action on this issue. That said, the Council's decision must be informed by a scientifically sound analysis. Even with our limited understanding of simulation models we can identify counter-intuitive and contradictory outcomes from the model that are influencing evaluation of the alternatives. Until the simulation model is corrected or the more robust IPHC MSE model is used to understand the impacts of bycatch on the resource and the directed

halibut fisheries we do not believe the Council has adequate information on which to select a preliminary preferred alternative. If the Council elects to move ahead despite these identified concerns, ALFA supports Alternative 4 and option 3 as the most likely to meet conservation and management goals.

Thank you for the opportunity to comment.



Linda Behnken  
(Executive Director, ALFA)

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<sup>1</sup> <https://www.nature.com/articles/s41586-021-03371>