

April 22, 2015

The Honorable --  
Senators Lisa Murkowski and Dan Sullivan  
Congressman Don Young  
United States Congress  
Washington, DC

Re: Bering Sea/Aleutian Islands Halibut Bycatch Reduction

Dear Senators and Representative:

The undersigned organizations represent a diverse group of halibut users including commercial, recreational, and subsistence fishermen, halibut dependent communities, and community development quota (CDQ) groups– from the Bering Sea, to the Gulf of Alaska to Southeast.

We are writing to express our deep concern regarding the high levels of halibut bycatch in the Bering Sea groundfish fisheries and to request your support for action by the North Pacific Fishery Management Council (NPFMC) in June 2015 that significantly reduces bycatch limits and prevents closure of the directed halibut fisheries.

Notwithstanding representations to the contrary, this is not just an allocation fight between 25 halibut fishermen in the Pribilof Islands versus halibut bycatch users in the groundfish fisheries. In fact, bycatch in these fisheries affects directed halibut fishermen and dependent communities in the commercial, recreational, and subsistence sectors throughout Alaska, and coastwide through Canada, Washington State, Oregon, and Northern California. The inequities involved violate Magnuson Stevens Act (MSA) National Standards 1, 3, 4, 5, 8, and 9.

I. A Reallocation of Halibut from Directed Users to Bycatch Users:

A dramatic reallocation of halibut from the directed halibut fisheries to bycatch users has taken place over the past decade. Due to conservation concerns, the directed halibut fisheries have undergone extreme cuts in their quotas, while the bycatch users have been permitted by regulation to catch and discard halibut up to the limit set more than 20 years ago, when the halibut resource was double what it is now.

The current Bering Sea/Aleutian Islands (BSAI) halibut bycatch limit of 4,426 Metric Tons (round weight, or weight of the entire fish) legally allows up to 7.32 million pounds of halibut (net weight, without heads and entrails) to be caught and discarded overboard as bycatch in groundfish fisheries. Meanwhile, this year, directed commercial halibut fishermen in the Bering Sea are limited to 3.815 million pounds (net weight). In 2014, BSAI trawl fisheries caught and discarded seven times more halibut than the directed fishery landed in the BSAI. BSAI trawl bycatch mortality was 5.009 million pounds – at an average weight of 4.76 pounds/fish, a total of 1,052,000 halibut. The directed fishery landed 3.28 million pounds – at an average weight of 22 pounds/fish, a total of 149,000 halibut.

Please note the differences in average weight between bycaught halibut and those landed by the directed fishery. The longline fleet is constrained from catching halibut less than 32-inches long.

Trawl fisheries have no such constraint. Of all halibut bycatch in Area 4CDE, 76% is less than 32-inches. These are two to seven year old halibut that have not yet spawned. These small fish are the future of the halibut stock, and must be protected.

## II. BSAI Halibut Bycatch is a Coastwide Problem:

Concerning the impacts of BSAI halibut bycatch throughout Alaska, International Pacific Halibut Commission (IPHC) studies reveal that halibut undertake lifelong migrations from nursery areas in the Eastern Bering Sea to the Gulf of Alaska and beyond. Of the under 26-inch – or juvenile – halibut tagged in the Bering Sea, 10-30% were recovered in the BS, while 70-90% were recovered in the Gulf.

There are currently 2,714 halibut IFQ Holders in the United States – and 1,965 of the IFQ holders are Alaskans, who all employ other Alaskans. In addition, there are a total of 1,157 vessels in the halibut IFQ and CDQ fleets. The CDQ fleet is based out of 39 Western Alaska villages. The directed halibut fishing vessels made IFQ landings in 32 different community ports in 2014. There are 77 distinct registered buyers that purchase halibut in these ports.

## III. Halibut is a Vital Subsistence Fishery:

Another critical concern in Alaska is that the effects of bycatch on the halibut resource threaten the halibut subsistence fishery. Residents of 118 rural Alaskan communities and areas, and members of 123 tribes, are eligible to participate in the federal subsistence fishery. In 2011, 4,705 individuals subsistence fished for halibut. Those individuals harvested an estimated 38,000 halibut, comprising 700,000 pounds -- a vital source of food and a critical cultural component for dependent villages and individuals, which must be protected. This is particularly important in areas where salmon has been all but removed from the traditional subsistence diet in an effort to conserve Chinook.

## IV. Halibut Bycatch Caps Must be Reduced to Avoid a Conservation Emergency:

The IPHC has steadily reduced directed halibut catch limits over the last 14 years as a necessary conservation measure in response to a declining available halibut resource. However, the halibut bycatch PSC limit – or cap – has not changed in response to the declining halibut resource, but remains in regulation set at the peak of halibut availability, with the exception of a small regulatory reduction with Amendment 80 implementation, and the limited voluntary reductions by groundfish fleets. To avoid a conservation and socioeconomic emergency, halibut bycatch caps must be reduced by percentages commensurate with directed halibut reductions.

To conclude, we recognize the importance of the BSAI groundfish fisheries to Alaska's economy and to the many dependent jobs. We also applaud the efforts of the groundfish fisheries to reduce halibut bycatch and mortality through industry-led innovations. However, significant reductions in bycatch limits are required in June in order to allow directed halibut fisheries to remain open and viable, while the NPFMC develops and implements longer-term management solutions designed to restore a balance in the use of halibut and to ensure the conservation of this emblematic species for future generations of Alaskans.

As our representatives in the U.S. Congress, we ask that you consider these facts in supporting our request.

Sincerely,

Alaska Longline Fisheries Association  
Alaska Marine Conservation Council  
Alaska Trollers Association  
Aleut Community of Saint Paul Tribal Government  
Aleutians East Borough  
Aleutian Pribilof Island Community Development Corporation  
Central Bering Sea Fishermen's Association  
City of Saint Paul Island, Alaska  
Coal Point Seafood Company  
Fishing Vessel Owners' Association  
Halibut Association of North America  
Homer Charter Association  
North Pacific Fisheries Association  
Pioneer Alaskan Fisheries, Inc.  
Tanadgusix Corporation  
United Fishermen's Marketing Association

cc:

Bill Walker, Governor of Alaska

Eileen Sobeck, National Oceanic and Atmospheric Administration