

Kenai Peninsula Borough Assembly

MEMORANDUM

TO: Kelly Cooper, Assembly President
Members, Kenai Peninsula Borough Assembly

FROM: Kelly Cooper, Assembly President *JB*
Brent Johnson, Assembly Member *JB*

DATE: October 1, 2020

RE: Resolution 2020-074, Advocating for a Reduction of Halibut Bycatch
(Cooper, Johnson)

The North Pacific Fishery Management Council (NPFMC) established by the Magnuson-Stevens Fishery Conservation and Management Act is holding their October Meetings.

Currently, a sector of the bottom trawl fishery in the Bering Sea (called the "Amendment 80 Fleet") operates with a "Prohibited Species Catch" (PSC) allowance of halibut and of other species. This PSC is a limit of bycatch of halibut, estimated in pounds, that the collective fleet must stay below in their fishing operations, or face shutdown until the next season. The bycatch of Pacific halibut in the Bering Sea by this fleet is widely seen as unavoidable, as often halibut and the species targeted by the Amendment 80 Fleet share ecosystems and even ecological niches.

Commercial and charter harvest of Pacific halibut is managed by the International Pacific Halibut Commission (IPHC). Each year the IPHC determines a Total Constant Exploitation Yield (TCEY) which is an aggregate number in pounds the commission believes can be sustainably removed from the coast-wide stock of the species. This number is annually a product of the IPHC Stock-Assessment (scientifically rigorous estimate of the biomass of Pacific halibut) and through a political process carried out by IPHC commissioners and stakeholder representatives. These processes set the *dynamic* annual allocations and limits all directed halibut fishers and fleets are subject to.

However, before any annual allocation can be set to directed fishers, the Amendment 80 Fleet's PSC of Pacific halibut is subtracted from the coast wide TCEY as a first cut. This cut is not *dynamic* like the TCEY but *static*. It is an annual cap that does not change to reflect the change in Pacific halibut abundance or any other biological or ecological characteristic. In times of low halibut abundance, this static allocation to non-directed users of the Pacific halibut

resource burdens directed users with smaller and smaller cuts of the remaining resource, and could potentially lead to the collapse of coastal Alaskan fisheries and communities if it remains unchanged.

The current analysis being presented to NPFMC in October examines the pros and cons of an abundance based PSC (bycatch), potentially changing the PSC from a static number to an annually dynamic one determined based on some index of halibut abundance. At the center of the analysis being presented to the NPFMC is the choice of which halibut abundance index to use. One is the annual IPHC Stock Assessment and the other is the National Marine Fisheries Service Bottom Trawl Survey. Neither index is truly suited to adequately or accurately establishing a PSC for the Amendment 80 Fleet. Both indexes have weaknesses in this specific application, so it comes to picking the lesser of two evils. That said, if preserving the halibut resource is a priority of the council and of any management body or sponsor, an index based on the IPHC Stock Assessment *must* be promoted.

Utilizing an index based on the bottom trawl surveys potentially increases the PSC the Amendment 80 Fleet would have access to. This is due to size and growth-related biological characteristics of the halibut stock. In short, Pacific halibut have experienced declining growth-performance over the past 20-30 years (it takes them longer to grow). This lowered growth-performance has been identified by the IPHC as the primary contributing factor to current levels of low abundance. This is important when a bottom trawl survey is a potential index in setting PSC. The smaller a halibut is, the harder time it has escaping a trawl net, and the more likely it is to be caught. This has led to Bottom Trawl Surveys showing an increase in halibut abundance despite an actually shrinking biomass of the species.

Basing a Prohibited Species Catch of this scale on an *inaccurate* and *misleading* index which does not capture the trends in abundance does not accomplish the goals or objectives the NPFMC seeks to ensure and does a disservice to every halibut fisher and halibut-dependent community in the state. If an index of halibut abundance has to be chosen from these options or their combination, the IPHC Stock Assessment should be weighted greater of the two options or be considered on its own.

We appreciate your support.