

ALASKA STATE LEGISLATURE



Commissioner Doug Vincent-Lang
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811

September 29, 2020

Delivered Electronically

Dear Commissioner Vincent-Lang,

It has been more than five years since the State of Alaska, through the federal North Pacific Fishery Management Council, agreed to lower Pacific halibut bycatch caps in the face of a diminishing biomass. Despite efforts on both sides for five years, tying the management of halibut bycatch to the halibut abundance is still not a reality.

While the federal Council struggles with the abundance-based management issue, Alaska's small boat fleets and the coastal communities bear the short- and long-term impacts that high halibut bycatch creates.

Short-term impacts are felt every year when halibut fishermen in the Bering Sea lose a part of their annual allocation that is tied not to abundance but to a portion of the forecasted landings of bycatch.

Long-term impacts are felt by halibut fishermen beyond the Bering Sea, as all sizes (including sub-legals) are removed from the entire biomass forever. The loss of the juvenile halibut to future catches in Southcentral and Southeast Alaska represent more than a 1:1 loss to those fishing communities.

Managing the prohibited species bycatch of halibut without tying it to the abundance of the halibut stocks is a political decision. Managing bycatch using abundance indices for the stock as a whole is a sustainability decision.

Politically-based management decisions that impact a long-lived, wide ranging species such as Pacific halibut are indefensible. If the overarching goal is sustainability, abundance-based management is the only approach.

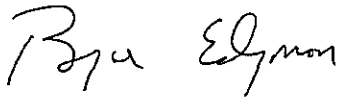
Tying halibut bycatch to abundance is especially important during low levels of abundance, a situation we have been in for the past eight years. The halibut population is particularly vulnerable to high caps that leave the gate open for lightning strikes, high-take levels that could mark a point of no return for several year classes of Pacific halibut.

Abundance-based management (ABM) would bring immediate positive results to Alaska's rural coastal communities. ABM means coastal communities are more sustainable because they can rely on rigorous management. The revenue generated by Alaska's coastal communities mean the state's economy is more stable long-term. Alaska's economy is stronger and more diversified when coastal communities thrive. They cannot thrive with the uncertainty of high prohibited species catches looming over them each year.

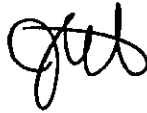
Pacific halibut is important to Alaskans culturally, economically, and socially. Halibut, salmon and crab are Alaska's most iconic seafoods, ones upon which coastal communities rely, and sadly, ones they are losing access to.

The Bush Caucus, representing rural and coastal Alaska, encourages the State of Alaska to take the lead on this issue when it comes before the North Pacific Fishery Management Council this October. Your actions to reduce halibut bycatch caps to levels that are directly tied to abundance will ensure that all sectors share in conserving the resource.

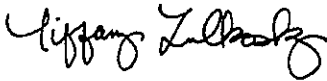
Sincerely,



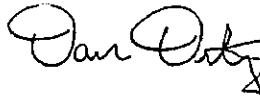
Representative Bryce Edgmon



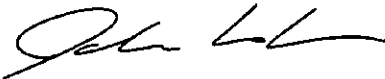
Representative Jonathan Kreiss-Tomkins



Representative Tiffany Zulkosky



Representative Dan Ortiz



Representative John Lincoln

CC:

Deputy Commissioner Rachel Baker, Alaska Department of Fish and Game
Karla Bush, Alaska Department of Fish and Game
Rachel Hanke, Alaska Department of Fish and Game