

FINAL

Oct. 22, 2021

Dear Glenn Merrill, Assistant Regional Administrator, Sustainable Fisheries Division,
Alaska Region NMFS,

Attn: Records Office.

On behalf of the Sitka Fish and Game Advisory Committee to the Alaska department of Fish, please accept these comments regarding reduction of bycatch in the BSAI trawl fisheries and the associated DEIS:

The Sitka Advisory Committee to the Alaska Department of Fish and Game is a collection of 17 publicly elected representatives of Fisheries, Wildlife, Subsistence and Conservation interests in the Sitka area. We are made up of a diverse collection of stakeholders, including sport and commercial interests, with a wide range of views represented on our council. All of our council members' livelihoods and ways of life are directly connected to the health of our Salmon runs, Halibut and Sablefish stocks, and our fisheries resources as a whole. Members of this committee have large amounts of money invested in permits and boats and businesses here in town that are directly connected to our fisheries resources. Many of our council members' livelihoods, and ways of life, as well as cultural and subsistence practices are directly connected to the health of this resource in southeast Alaska and beyond. The individuals represented on this committee feel that responsible management of these resources are of paramount importance to our community, and communities across southeast Alaska, as fisheries and tourism are some of the main economic drivers across the region. These stocks are also tremendously important for community resilience and food security, as we have been reminded over the past two years of the Covid-19 pandemic.

Sitka is a rural community. Many of us practice subsistence harvesting; we fill our freezers, feed our families on fish, and we enjoy this way of life. Many have trouble with the word *subsistence* because it does not truly describe what it is to live this way, and it does not capture how our communities thrive directly because of that connection to these lands and waters. Halibut and Salmon are especially culturally important- The indigenous people of this region have relied on these foods and have managed this resource successfully since time immemorial.

This is not the first time we have weighed in on this issue. The Sitka Fish & Game Advisory Committee has a long record of supporting resource conservation. In particular we have supported prohibition of groundfish trawling in both Federal and State waters, off of SE Alaska, because of by-catch problems and concerns for habitat

destruction. We collectively felt it was of utmost importance to weigh in on this topic in an official capacity ahead of this comment deadline. We have serious concerns over the quality of the associated EIS and the lack of inclusion of data showing the impacts to the Gulf of Alaska stocks and the impacts to our fisheries and fishermen here in southeast Alaska. The EIS needs to be more robust for this process to have any meaningful impact in addressing these long standing problems related to bycatch.

The Sitka Fish & Game Advisory Committee met Thursday Oct. 21 and unanimously approved the following motion:

*“We favor reducing (**trawl**) halibut by-catch as much as possible as soon as possible. Additionally we feel (**trawl**) by-catch of other species such as salmon, shellfish, and sablefish need to be reduced as much as possible as soon as possible. “*

We unanimously support the option that most significantly reduces allowable bycatch. Alternative 4 represents the greatest reduction of that limit and supports abundance based management of these resources. While this is the alternative most in alignment with addressing our concerns, many of us feel that this is still not enough to act quickly enough to prevent the further decline of these populations that we are already witnessing first hand. All trawl bycatch needs to be reduced substantially. We acknowledge that this will be hard for the trawl fleet to deal with but the situation we currently find ourselves in is the result of one fishery putting their own needs over what keeps things sustainable for the state as a whole. The data is astounding; the numbers don't lie, our fish and crab populations are in trouble, and if this is allowed to continue there will be no turning back on this. Drastic action needs to be taken now.

While participating in the Spring 2021 meetings, testimony had been given by representatives of the trawl fleet expressing their concerns over their inability to further reduce their bycatch without losing fishing time. Every other fisherman in southeast Alaska has already lost fishing time due to the impacts of so many of our Salmon river systems not meeting proper escapement for too many consecutive years resulting in listings as stocks of concern. The Taku and Stikine are set to be added to that list at this upcoming Board of Fisheries meeting in January of 2022. This will undoubtedly result in more loss of fishing time for the southeast fishing fleet. The amount of allowable bycatch of King Salmon as well as other important species such as Halibut, Sablefish, and Crab is out of control. It should not be up to the small boat fleet to carry the burden of the trawl fleet's inability to catch their target species without collateral damage. Halibut and King Salmon are subject to international treaties which allow Alaska a set amount of harvest every year. To allow these large industrial scale interests to take such a large amount of fish as bycatch, as waste, impacts us directly in terms of how much of the annual take of these species, (particularly Halibut and King Salmon), is left to spread around amongst the rest of us. In times of low abundance it should not be the

people that need this resource the most that should have to pay the price for the industry's wasteful practices. Yet that is what is happening. As a resource becomes more scarce the conflicts over that resource become greater. As representatives of our local AC, we see the impacts of this first hand as we as a community are left to work out these conflicts, and fight over the remaining scraps amongst ourselves.

The current practices and degree of waste as bycatch of these species represents an egregious failure of this system and our fisheries management. Allowing these practices to continue damages the reputation of Alaskan seafood, the reputation of this region for fisheries management, and works counter to ensuring the longevity of these species. Trawlers should not be allowed to continue the senseless destruction of fisheries so important to the livelihoods and subsistence lifestyles of the peoples and communities like ours, that rely on this resource across Alaska.

Furthermore, we recommend the selection of Alternative 4 and support the greatest reduction in bycatch levels along with abundance based management. Thank you for your time and consideration and the opportunity to weigh in on this important topic.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heather Bauscher".

*Heather Bauscher, Chair
Sitka Fish & Game Advisory Committee*