



May 22nd, 2024

To Whom it May Concern,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's marine ecosystems and the vibrant fishery-dependent communities they sustain. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems.

In December 2023, AMCC joined an intervener group, the Halibut Defense Alliance, in support of the National Marine Fisheries Service (NMFS) in a lawsuit filed against them by the Groundfish Forum (GFF). GFF's lawsuit is an effort to vacate, or overturn, Amendment 123 (A-123), a NMFS regulation that went into effect January 1st, 2024. A-123 bases the prohibited species catch (PSC), or bycatch, limits for halibut by the Amendment 80 (A80) trawl sector on halibut abundance. This is a change from the flat PSC limit that the A80 fleet has operated under for decades, a limit which is taken out of the assessment of total allowable halibut harvest before directed fisheries allowances are set. Under A-123, when stocks decline, halibut bycatch limits are lowered for the A80 sector - in a similar manner to IFQ holders seeing their fishable pounds decrease in times of decline. In times of abundance, IFQ harvesters see an increase in their harvestable pounds and the A80 sector's PSC rates would increase. Prior to A-123, the fishing pressure on juvenile halibut in the Bering Sea by the A80 sector was ecologically and economically detrimental, particularly in times of low abundance. It is important to protect A-123 as a vital outcome of thorough public process.

The Halibut Defense Alliance is a collection of industry, tribal, municipal and environmental groups from Southeast Alaska to the Bering Sea that want to see the burden of conservation for the pacific halibut stock to be shared among all harvesting sectors. We do not see this as a sector vs sector issue, but rather as an action consistent with the basic principle of abundance-based management: a hallmark of sustainable fisheries.

Because of AMCC's involvement as interveners and the City of Homer's reliance on a healthy halibut stock, AMCC is asking the Homer City Council to sign a resolution in support of NMFS and Amendment 123. A draft resolution is provided for City officials and lawyers to consider. Stakeholder groups from other coastal communities are reaching out to their respective city/borough assemblies and asking them to also sign resolutions (Petersburg has passed a resolution and Cordova is close to) so that they can be compiled in an amicus brief, filed by one community on behalf of halibut-dependent communities, to emphasize coastwide

support for this commonsense action. I feel strongly that the City of Homer is well positioned to file such a brief, and can talk more about resources available to make that possible.

Please do reach out with any questions, I am happy to discuss this further.

Sincerely,

A handwritten signature in dark ink, appearing to read "Marissa Wisniewski", with a long horizontal flourish extending to the right.

Marissa Wisniewski
Executive Director, AMCC

Interveners in the Halibut Defense Alliance:

City of St. Paul
Aleut Community of St. Paul
Central Bering Sea Fishermen's Association
Alaska Longline Fishermen's Association
Petersburg Vessel Owner's Association
Fishing Vessel Owner's Association
North Pacific Fishermen's Association
Homer Charter Association
Halibut Association of North America
Alaska Marine Conservation Council
The Boat Company
Seafood Producers Co-op