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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

GROUND FISH FORUM, INC.,

Plaintiff,

v.

NATIONAL MARINE FISHERIES
SERVICE, *et al.*,

Defendants.

Case No. 3:23-cv-00283-JMK

DECLARATION OF RAYMOND ALEXANDER MELOVIDOV

Groundfish Forum, Inc. v. NMFS
Case No. 3:23-cv-00283-JMK

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Ex. B, p. 1

I, Raymond Alexander Melovidov, declare as follows:

1. I am over 21 years of age and under no legal disability. The facts stated in this Declaration are true and correct based on my personal knowledge and my review of business records. I give this Declaration voluntarily for use in support of the motion to intervene in the above-captioned litigation filed on behalf of the Central Bering Sea Fishermen's Association ("CBSFA"), and for all other purposes allowed by law.

2. I am the President of CBSFA, a position I have held since December 2023. I have worked for CBSFA for 22 years. Before my promotion to President, I served as CBSFA's Chief Operating Officer for six years, where I was responsible for developing and managing CBSFA's community programs and projects, as well as most of CBSFA's wholly owned subsidiaries and fishing quotas. I am a resident of Saint Paul Island, where I have served on the City Council since 2015.

3. CBSFA is the designated management organization for Saint Paul under the Western Alaska Community Development Quota (CDQ) Program. The CDQ program was established by the North Pacific Fishery Management Council (Council) in 1992 and incorporated into the Magnuson-Stevens Fishery Conservation and Management Act of 1996. Historically, many communities in Alaska could not participate meaningfully in the large-scale commercial

seafood industry due to a lack of industry infrastructure, limited workforce skills, and limited financial resources for investing in fishing enterprises. The CDQ program seeks to address these challenges by allocating harvestable fish stocks to CBSFA and five other designated regional, non-profit CDQ holders, which then use fisheries-generated revenues to promote economic opportunity in their regions by creating jobs, building infrastructure, providing social services, and encouraging workforce development through training and scholarships.

4. As the CDQ organization for the Saint Paul community, CBSFA holds fishing quotas in the Pacific halibut fishery, along with other Bering Sea and Aleutian Islands groundfish and crab fisheries. This quota is collectively called CDQ. To fulfill its statutory responsibilities under the CDQ program, CBSFA prioritizes its CDQ halibut for harvest by the privately-owned Saint Paul-based small boat fleet (local fleet) and harvests any remaining pounds directly on company-owned vessels. CBSFA buys the CDQ halibut harvested from the local fleet, markets the CDQ halibut, and uses the revenues to provide income to the local fleet. CBSFA also buys and markets halibut Individual Fishing Quota (IFQ) owned and caught by fishermen in Saint Paul, which helps support Saint Paul's halibut fishery and provide economic opportunities to the community's residents.

5. As President of CBSFA, I oversee CBSFA's day-to-day operations and its programs to invest in and support the Saint Paul Island community, which are made possible through CDQ revenues, including revenues generated through the halibut directed fishery. Many of these investments have focused on building and supporting a viable, sustainable halibut directed commercial fishery in the Central Bering Sea and the waters around the Pribilof Islands.

6. In addition to my work for CBSFA, I am a halibut fisherman. I have invested in halibut quota and have fished CDQ halibut for many years. I am a second-generation commercial halibut fisherman who fishes with my father and two brothers on our family-owned boat. It is unique and special to grow up fishing with family; it was a shared experience of learning about the ocean that provides for us, as it did for the generations of subsistence halibut fishermen that came before us. It has also provided me with the work ethic and understanding to operate successful fishing operations. I have two children of my own now and strongly desire for them to grow up fishing like I did. In a community that has relatively limited options for employment, the opportunity to provide for yourself and develop a successful small business is nearly impossible to quantify by traditional metrics. It is the cornerstone to the future of our community. I have also experienced firsthand how CBSFA's programs and investments — all made possible by its fisheries-generated revenues —

help the Saint Paul community. In fact, CBSFA scholarship funding helped make it possible for me to go to college, allowing me to obtain a degree in economics from the University of Alaska, Anchorage, and then to return home to Saint Paul to work for CBSFA so I can help provide similar opportunities to other members of my community.

Halibut's Importance to CBSFA and Saint Paul Island

7. Beyond providing CDQ funds to help the community, halibut and the halibut fishery play a key role in the economy of Saint Paul and our residents' lives. Halibut fishing is the largest source of private employment on Saint Paul. It is the primary source of income for Saint Paul's vessel owners and crewmembers. Many other residents of Saint Paul are also employed in businesses that support and provide services to the halibut fishery and fleet, including fuel, storage, processing, and packaging operations.

8. Halibut's importance to Saint Paul has grown as other Bering Sea fisheries have declined. The populations of many economically important crab species have declined precipitously in recent years. To conserve these stocks, managers have been forced either to close fisheries completely or drastically reduce the total allowable catch. For example, the total allowable catch for Bering Sea snow crab was cut by 87% in 2021, falling from 45 million pounds

down to just 5.6 million pounds. This was followed by the total closure of the snow crab fishery in both 2023 and 2024. At the same time, red king crab fisheries have been closed for two years, with only a small and conservative fishery allowed this year. These cuts have caused enormous hardship for Saint Paul and left the commercial halibut fishery as one of the few options available to provide income and economic opportunity on the island.

9. Halibut and halibut fishing are also central to Saint Paul's culture. As a predominantly Alaska Native community, Saint Paul's residents have a deep cultural bond with the halibut resource, which has sustained them for generations. Participating in the halibut harvest, and sharing the ocean's bounty with the community, is a source of immense personal and cultural pride for the community's residents. It is also an important source of sustenance for the residents of Saint Paul, who have engaged in subsistence halibut fishing with their families for generations.

Management of the Halibut Stock and the Halibut Fishery

10. While the Pacific halibut is managed by the International Pacific Halibut Commission (IPHC) under a treaty between the United States and Canada, fishery management plans developed by the Council and the

corresponding implementing regulations issued by the National Marine Fisheries Service (NMFS) directly affect the halibut fishery.

11. The IPHC is authorized to manage the halibut stock and set limits on the total amount of halibut that can be removed from the population each year, but it has no control over the amount of halibut that can be taken as bycatch in U.S. fisheries, which are managed by the Council and NMFS. This means that the IPHC's only option to conserve the halibut stock is to reduce harvest limits for the directed halibut fishery. The IPHC thus subtracts halibut killed as bycatch from the total allowable catch when it sets the directed fishery's harvest limits. In other words, halibut killed as bycatch are "taken off the top," leaving whatever is left over for the directed fishery and other users. Every pound of halibut killed as bycatch therefore reduces the amount of halibut available to the directed halibut fishery.

12. Each year the IPHC evaluates the status of the halibut stock. These annual stock assessments use sophisticated models that incorporate a variety of data to estimate halibut abundance and population trends. This includes the "IPHC Fishery Independent Setline Survey" and "NMFS Eastern Bering Sea trawl survey," which are the same fishery independent surveys used in Amendment 123 to estimate halibut abundance. The data and stock assessment models used by the IPHC are carefully reviewed by the IPHC's

Scientific Review Board, which is made up of non-IPHC scientists, who provide an independent scientific review of the data and stock assessment and who provide recommendations to the IPHC regarding acceptable harvest levels in any given year.

13. The results of the annual stock assessments are used by the IPHC to set limits on the amount of halibut that can be removed in each of the IPHC's regulatory areas, which extend from California to the northern Bering Sea. A map of the IPHC's regulatory areas is included as Figure 1 below. Under the IPHC's system, the regulatory areas covering the northern and eastern Bering Sea — Areas 4C, 4D, and 4E, respectively — are managed together and are collectively called "Area 4CDE." Saint Paul Island is in IPHC Area 4CDE.

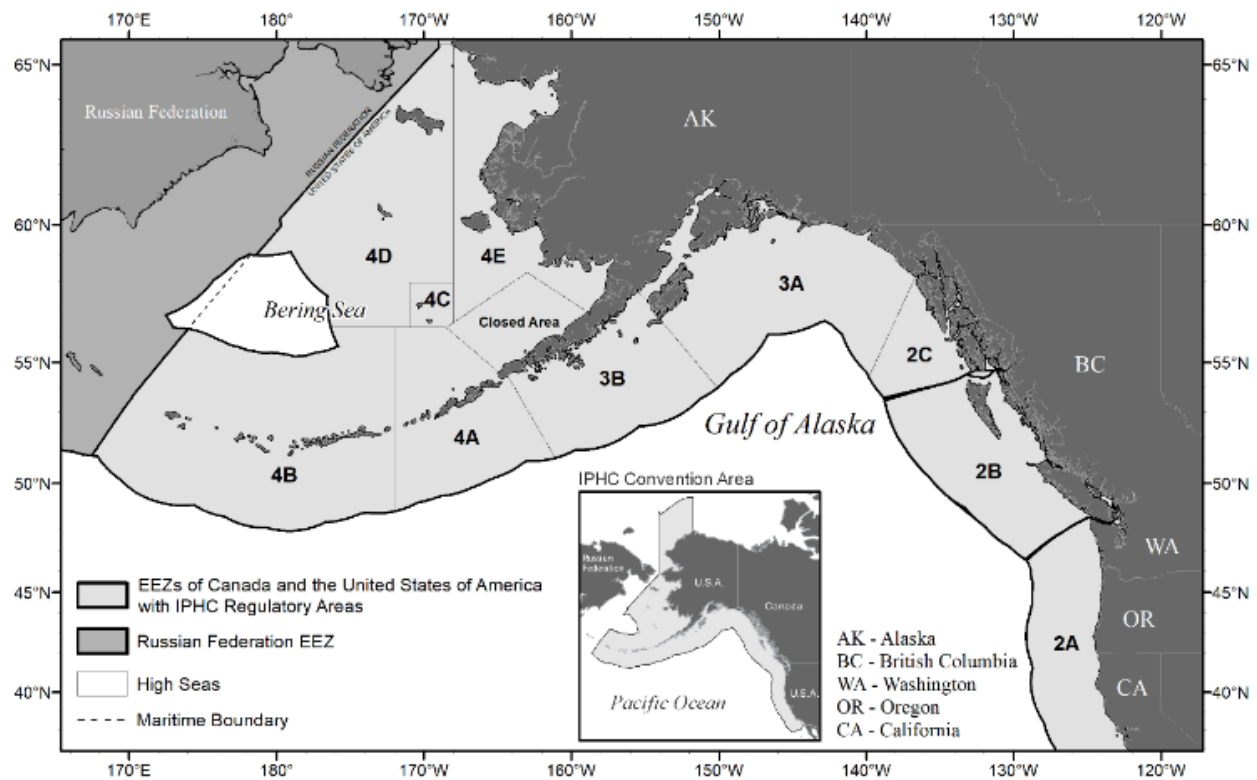


Figure 1. Map of IPHC Regulatory Areas

14. According to the most recent IPHC stock assessment published in January 2024, the halibut stock is at its lowest level in decades. A figure reproduced from the IPHC’s 2024 stock assessment showing the estimated spawning stock biomass trends is included as Figure 2. As can be seen, the halibut spawning stock biomass went down substantially during the 1990s and 2000s and has remained at low levels ever since. Further, catch rates in the directed fishery and recruitment of young fish to the stock are extremely low. In fact, according to IPHC scientists, recent recruitment is at low levels that have not been seen since at least the early 1970s.

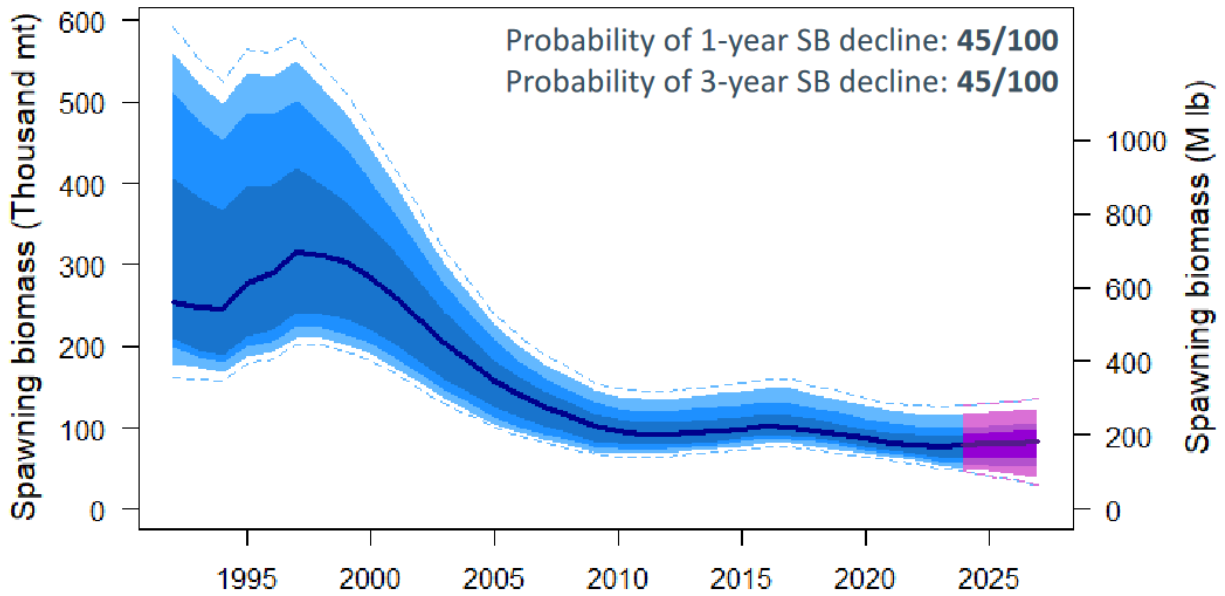


Figure 2. IPHC Projected Spawning Stock Biomass Assuming 2023 Fishing Mortality

15. The combination of low halibut abundance, low recruitment, and mortality from bycatch has resulted in some of the lowest mortality limits and directed fishery harvest limits I have ever seen. In 2023, for example, the IPHC reduced the total mortality limits for the stock by 14.4% from 2022 levels. In Area 4CDE, the IPHC’s total mortality limit for 2023 was 1,746 mt, which was 6.1% lower than the 2022 limit. In late January of this year, the IPHC adopted even lower limits for 2024, this time reducing the total mortality limit by another 4.57% from the 2023 level.

16. For comparison, the IPHC’s 2024 total mortality limit for Area 4CDE is 1,678 mt. This is less than the Amendment 80 fleet’s bycatch limit

before Amendment 123, which was fixed at 1,745 mt. In other words, the Amendment 80 fleet's previous bycatch limit – which the fleet is attempting to reinstate – is more than the current total halibut mortality allowed by the IPHC in the central, northern, and eastern Bering Sea combined.

**Amendment 80's Bycatch and its Impact
on the Directed Fishery in Area 4CDE**

17. While overall halibut abundance and directed fishery limits are low, the number of halibut killed as bycatch remains very high. According to data from NMFS, trawlers in the BSAI killed almost 34 million pounds of halibut from 2015 to 2022. In Area 4CDE where I fish, bycatch mortality has dwarfed the directed fishery landings every year for the past two decades. In 2014, for example, directed fishery landings accounted for just 20% of halibut removals in Area 4CDE. Despite efforts by the Council and NMFS to reduce halibut bycatch, 2022 was only slightly better, with the directed fishery landings accounting for only 32% of halibut removals in Area 4CDE. The total catches for 2023 are still being tabulated, but I do not expect them to change much from what has previously occurred.

18. The cumulative imbalance between halibut killed as bycatch and directed fishery landings grows larger every year. Based on data from NMFS and the IPHC, CBSFA estimates that trawlers killed over 21.3 million net

pounds of halibut in Area 4CDE from 2015 to 2022 (or more than 28.4 million pounds of halibut round weight).¹ This is compared to directed fishery landings in Area 4CDE totaling only 11.9 million net pounds over the same period, meaning that trawl bycatch mortality was nearly double (180%) the directed fishery landings. Based on historical halibut prices, this amounts to about \$115 million in ex-vessel revenue to the directed fishery. Figures adapted from CBSFA's comments submitted to NMFS in February 2023 that show this disparity are included below. Importantly, these figures focus on the period since 2015, when serious efforts by the Council to reduce halibut bycatch mortality began. The amount of halibut killed as bycatch would be much higher if earlier years were included.

¹ "Round weight" is the total weight of the fish. Halibut fishery landings are typically reported in "net weight," which is the weight of the fish after it has been headed and the viscera have been removed at sea.

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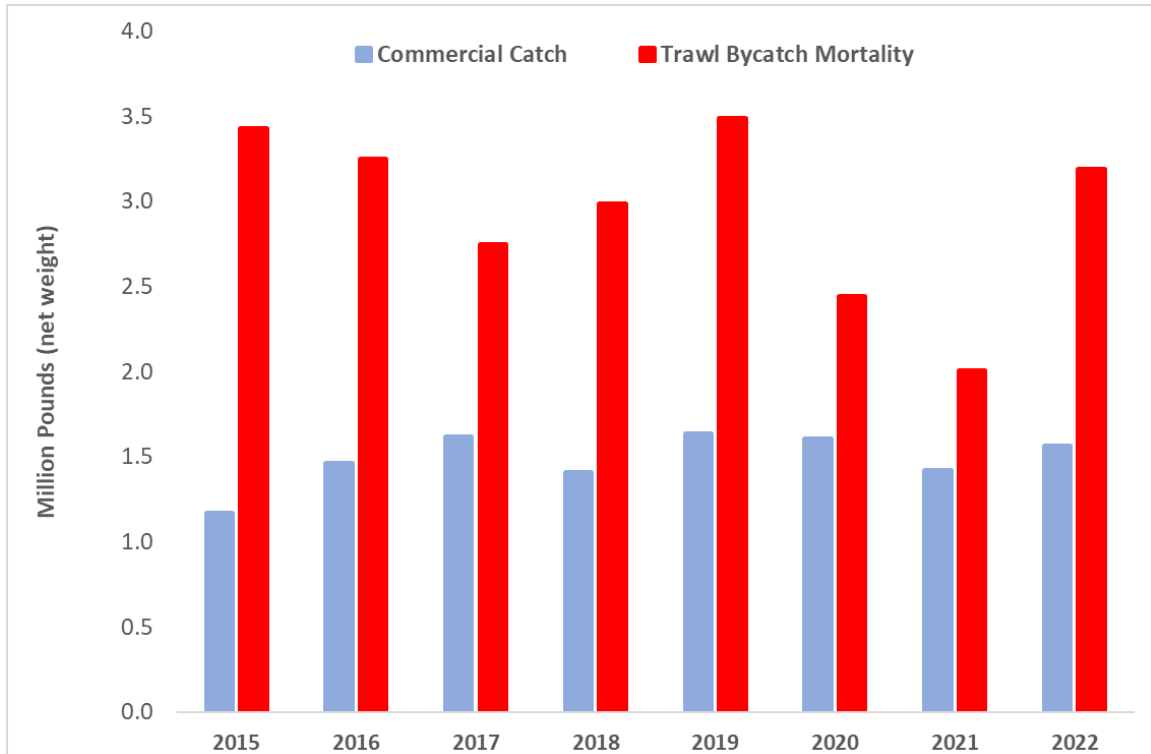


Figure 3. Annual difference between halibut bycatch mortality and commercial fishery landings in Area 4CDE

19. The halibut killed as bycatch in Area 4CDE are overwhelmingly small juvenile fish. The numbers above, which are based on weight, thus do not accurately capture the real impact of bycatch, because the same weight of bycatch will represent millions more fish than the commercial fishery lands. For example, according to data published by the IPHC for the period from 2015 to 2017 (the last year for which data are available), the average net weight of fish caught by the directed fishery in Area 4CDE was 22.67 pounds. In contrast, the average weight of halibut killed by trawlers in Area 4CDE was just 5.19 pounds, meaning that the average halibut caught in the directed

fishery weighed 4.4 times more than halibut killed as bycatch. Using information about the average weight of fish caught as bycatch and landed in the directed fishery, CBSFA estimates that bycatch users killed and discarded over 4.1 million halibut between 2015 and 2022 in Area 4CDE. This is almost 8 times more halibut than estimated directed fishery landings. Figures adapted from CBSFA’s comment letter submitted to NMFS showing this disparity are included below.

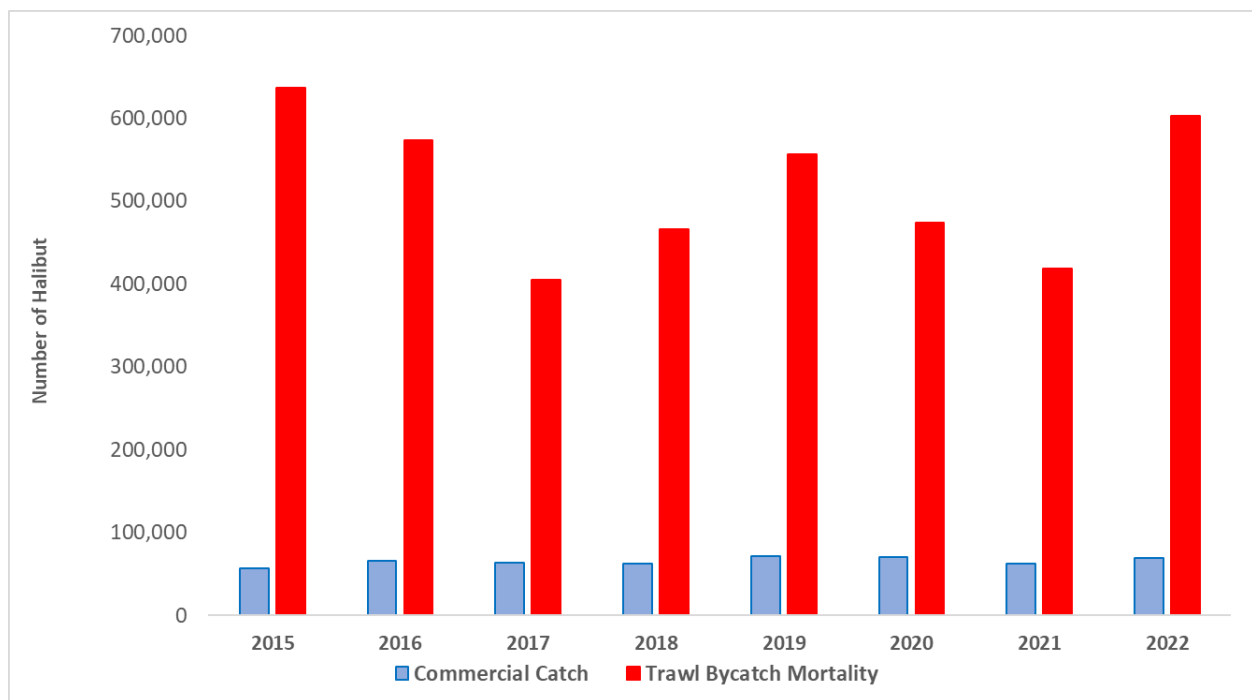


Figure 4. Estimated number of fish killed as bycatch and caught by the directed fishery in Area 4CDE

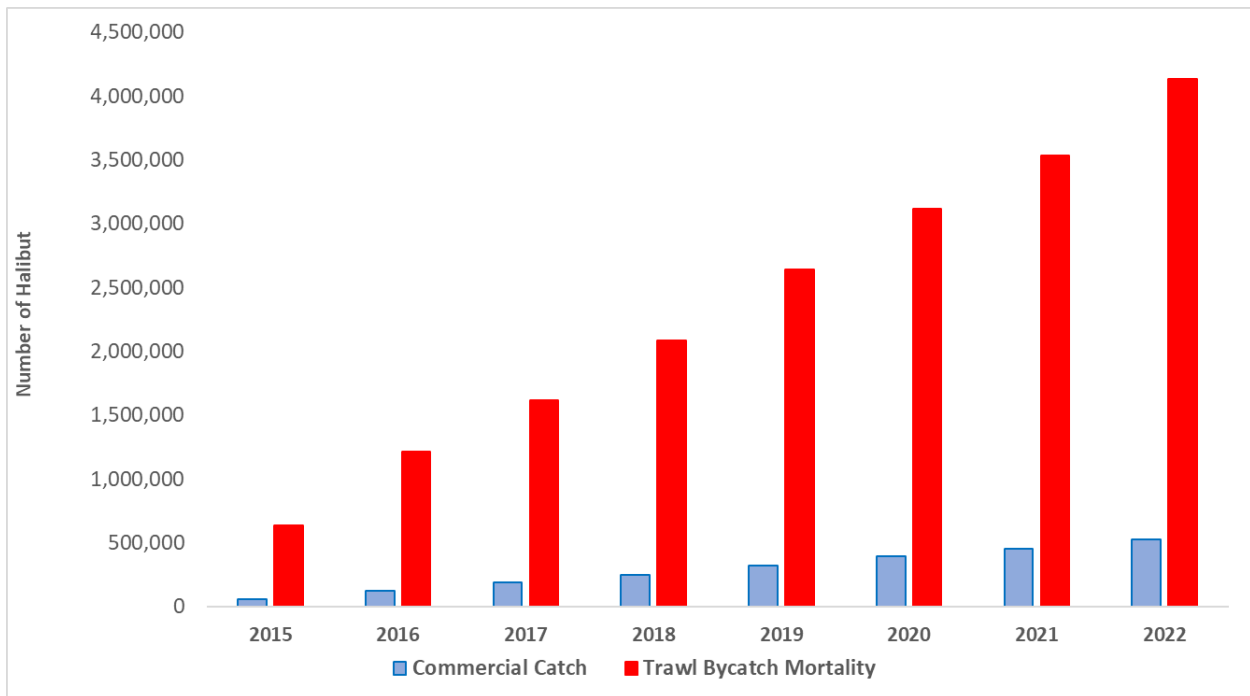


Figure 5. Estimated cumulative number of fish killed as bycatch and caught by the directed fishery in Area 4CDE

20. It is very significant that trawl bycatch kills predominantly small juvenile fish. When fish are killed as juveniles, they can never grow to maturity, reach legal size where they can be caught by the directed fishery, or reproduce and contribute to the health of halibut population. Additionally, the Bering Sea — and Area 4CDE specifically — are critical halibut nursery habitat. Juvenile bycatch mortality in these areas affects the halibut resource in other areas, because killing young immature fish in nursery areas prevents them from migrating to other areas and contributing to the broader halibut population.

21. Given this, halibut bycatch in the BSAI and Area 4CDE has both immediate and long-term effects on the halibut fishery. Killing larger mature fish that have reached legal size directly reduces the directed fishery catch. Killing small juvenile fish affects the halibut fishery and the coastwide halibut stock, because those fish can never reach legal size or maturity. While these longer-term benefits are difficult to measure, research by IPHC scientists suggests that every pound of bycatch that is eliminated results in between 1 and 1.44 pounds of yield to the directed fishery coastwide.

22. The Amendment 80 fleet is by far the most significant contributor to halibut bycatch mortality in the BSAI and Area 4CDE. The Amendment 80 fleet alone is responsible for well over half of all the halibut killed as bycatch in the BSAI. In 2022, for example, the Amendment 80 fleet was responsible for about 69% of the total BSAI halibut bycatch mortality. Within the BSAI trawl fisheries, the Amendment 80 fleet is responsible for the overwhelming majority of the halibut killed as bycatch, accounting for nearly 74% of the halibut mortality in 2022. This can be seen in Table 1 below, which shows halibut mortality by sector in metric tons. Table 1 is based on NMFS data and is reproduced from comments CBSFA submitted to NMFS in February 2023. In total, the Amendment 80 fleet killed almost 24 million pounds of BSAI halibut

from 2015 to 2022, despite efforts during this period to reduce the fleet's bycatch mortality.

Table 1. Halibut Bycatch Mortality in the BSAI by Fishery Sector

BSAI Sector	2015	2016	2017	2018	2019	2020	2021	2022
Non-Pelagic Trawl (A80 C/P)	1,638	1,412	1,167	1,343	1,461	1,097	1,044	1,519
Non-Pelagic Trawl (AFA C/P)	71	78	57	105	39	34	38	67
Non-Pelagic Trawl (Catcher Vessels)	310	410	337	309	499	262	155	257
Non-Pelagic Trawl (CDQ)	100	140	129	137	168	90	80	90
Pelagic Trawl (AFA C/P)	74	64	57	32	66	56	78	93
Pelagic Trawl (AFA C/V)	30	19	17	10	16	19	18	17
Pelagic Trawl (CDQ)	8	9	6	7	17	10	13	13
Trawl Total	2,231	2,132	1,770	1,943	2,266	1,568	1,426	2,056
Amendment 80 Share of Halibut PSC Use	73.4%	66.2%	65.9%	69.1%	64.5%	70.0%	73.2%	73.9%

23. Further, the impacts of Amendment 80 bycatch are disproportionately and increasingly concentrated in Area 4CDE and the waters off Saint Paul. Over the past decade, the share of Amendment 80's bycatch mortality that occurred in Area 4CDE has gone up steadily, with nearly 90% of the halibut that Amendment 80 kills concentrated there in recent years. As a result, the Amendment 80 fleet kills and wastes far more halibut in Area 4CDE than the directed fishery harvests. During the period from 2015 to 2022, for example, Amendment 80 bycatch mortality exceeded

directed fishery landings by well over 3 million pounds. Again, this estimate focuses only on the period from 2015 to 2022, so it already accounts for the bycatch reductions adopted by the Council in 2015. The difference would be even larger if earlier years were included.

24. Before the lower bycatch limits in Amendment 123 were adopted, the Amendment 80 fleet's bycatch limit was both substantially higher and fixed at a constant 1,745 mt. This let Amendment 80 consume a disproportionate share of the halibut in Area 4CDE. And, because directed fishery limits are set based on abundance, to consume a larger and larger share of the halibut as abundance declined. It even allowed the possibility that bycatch would literally consume all the available halibut in Area 4CDE and completely preempt the directed fishery.

25. The economic uncertainty created by low catch limits, and even potential preemption, was devastating to the directed fishery in Area 4CDE. It drove down the value of Individual Fishing Quota (IFQ) held by individual halibut fishermen, made it very difficult to invest in the directed fishery, and forced many small-boat participants out of the fishery entirely. According to the EIS, for example, the number of vessels participating in the directed fishery from 2015 to 2019 fell more than 60% compared to previous levels, as harvest limits were slashed due to low abundance and high bycatch. The

declines were even more dramatic for the small-boat fishery in Area 4, which fell by about 80% compared to the 2010 to 2013 average.

26. Amendment 123 seeks to address this problem. As the Final Environmental Impact Statement supporting Amendment 123 states, it “reflects the Council’s efforts to balance several factors when establishing [bycatch] limits, including the likely impacts on the halibut stock and affected participants in the Amendment 80 and directed halibut fisheries.” It is an effort by the Council to address the “imbalance among users” that previously existed, where Amendment 80 took an overwhelming share of the available halibut resource, recognizing that “greater conservation of the halibut resource is warranted and required.” Amendment 123 therefore “balances the interests of the two largest halibut user groups in the BSAI” — the Amendment 80 fleet and halibut fishermen — by setting abundance-based limits for Amendment 80 that decrease when halibut abundance declines, just as directed fishery catch limits have for many years.

27. Under Amendment 123, limits on the Amendment 80 fleet’s halibut bycatch mortality remain unchanged from previous levels when the halibut population is doing well and abundance is high. As abundance declines, the fleet’s bycatch limit is reduced. When both the IPHC Setline Survey and the NMFS Eastern Bering Sea Trawl Survey are both in the “low” range, for

example, the Amendment 80 fleet's bycatch limit would be reduced by 25% to 1,309 mt (2.89 million pounds). If the surveys were to ever fall into the "very low" range, the fleet's limit would be reduced by 35% to 1,134 mt (2.50 million pounds). The surveys have never reached the very low state, however, so it is impossible to know whether the fleet might ever be subject to this limit.

28. Amendment 123 is essential to preserve the directed fishery in Area 4CDE. It will increase the amount of halibut available to the directed fishery and help to ensure the halibut fishery remains viable, even when abundance is low. This will provide badly needed relief to the directed fishery and give fishermen the opportunity to provide for themselves. It will also help to spur sustained investment in the fishery in the years to come.

CBSFA's Efforts to Limit Halibut Bycatch Mortality

29. CBSFA has been working with the Council and NMFS for many years to secure meaningful limits on halibut bycatch in the Bering Sea. For example, CBSFA was heavily involved in the Council's 2015 decision to reduce the overall halibut bycatch limits in the BSAI. At the time, CBSFA advocated a 50% cut in the halibut bycatch limits. This would have reduced bycatch by about as much as the directed fishery catch limits had declined due to falling halibut abundance. While the Council did not go that far, and instead reduced

bycatch limits by 21% to give the Amendment 80 fleet and others more time to adapt to lower limits, Council members recognized that new limits were only a “first step” and that additional bycatch reductions were needed.

30. Almost immediately after it concluded the 2015 action, the Council began looking at ways to set bycatch limits that varied with halibut abundance, so that bycatch would not continue to consume such a disproportionate amount of the available halibut when abundance declines. CBSFA has advocated for such “abundance-based management” throughout this process. CBSFA’s representatives testified before the Council dozens of times on issues related to abundance-based management. CBSFA also submitted detailed comments to the Council and NMFS supporting abundance-based management at every stage of the process.

31. CBSFA, along with many other groups and halibut-dependent communities, advocated even steeper bycatch cuts than the Council adopted in Amendment 123. Still, the compromise alternative adopted by the Council provides significant relief to the directed fishery when abundance is low. It also helps to make bycatch management more consistent with the management of other fisheries, which set limits based on estimates of abundance.

32. CBSFA and the Saint Paul community would be harmed if the plaintiff were to succeed in this case. The plaintiff seeks to invalidate

Amendment 123 and to return to its higher static bycatch limits. This would significantly increase the amount of halibut the Amendment 80 fleet will kill as bycatch in the BSAI and substantially reduce directed fishery catch limits. This would impair CBSFA's ability to fulfill its CDQ responsibilities, and substantially harm the Saint Paul community and other halibut users in the BSAI and elsewhere.

Response to Certain Statements in the Plaintiff's Complaint

33. CBSFA strongly disagrees with the plaintiff's claims. I feel compelled to respond to certain statements in the complaint, because I believe they are misleading and give the false impression that the reduced bycatch limits in Amendment 123 are not needed and will result in significant economic impacts to the Amendment 80 fleet.

34. For example, I am aware that the plaintiff's complaint alleges that much of the commercial halibut limit has not been caught in some years, which I interpret as a suggestion that additional limits on halibut bycatch and abundance-based management are unnecessary. This is not correct. According to the most recent information available from IPHC, landings in Alaska (Areas 2C, 3, and 4), which are still being tabulated, represented about 73% of the

2023 commercial fishery limit. Commercial fishery landings in Alaska were 85% of the limit in 2022, and 92% of the fishery limit in 2021.

35. To the extent part of the commercial fleet could not catch its full limit in Area 4CDE, this was due to low halibut abundance and low catch rates. In 2023, the “catch per unit of effort” in the Area 4CDE commercial fishery was extremely low, falling by about 30% from 2022 levels according to the IPHC. This was particularly problematic in Area 4D where most of the commercial fishery harvest has occurred in recent years. This meant that halibut fishermen had to spend a great deal more effort for each halibut they caught. In other words, they had to spend much more time, and much more money on fuel, bait, and crew’s salaries, just to catch the same amount of halibut. Often, the catch rates in Area 4CDE were so low that it was economically infeasible to continue to fish for halibut, which prevented halibut fishermen from harvesting their entire limit. It is very disappointing that the Amendment 80 fleet would try to use the consequences of low halibut abundance to support their effort to increase the amount of halibut the fleet can kill as bycatch.

36. I am also aware that the plaintiff suggests the Amendment 80 fleet could experience extremely large monetary losses due to Amendment 123’s reduced bycatch limits. These claims are based on economic models used in the Final EIS that, among other things, rely on outdated data that do not account

for changes in the fishery adopted in response to the lower bycatch limits established by the Council in 2015. The models also assume that the Amendment 80 fleet will do nothing to respond to the new limits in Amendment 123, but instead will continue with business as usual until their fishery is shut down. Neither assumption reflects reality and the Final EIS drastically overstates the potential economic impacts to the Amendment 80 fleet. The many reasons why the modeled economic impacts in the Final EIS are discussed in detail in CBSFA's comments and in the testimony of Dr. Sara Sutherland, an economist at Duke University, that was submitted to the Council. At the same time, the Final EIS also substantially understates the gains to the directed fishery that will result from reduced bycatch limits. Again, the reasons for this are explained in detail in CBSFA's comments and testimony.

37. CBSFA disagrees that impacts to the Amendment 80 fleet will be anywhere near the numbers reported in the Final EIS. As CBSFA and Dr. Sutherland explained in their comments to the Council and NMFS, the actual impacts to the Amendment 80 fleet's revenues are likely to be a tiny fraction of the values generated by the economic models, if there are any impacts at all. Even still, the Final EIS recognizes that the dollar amounts the plaintiff cites should not be interpreted as an estimate of future economic impacts to the

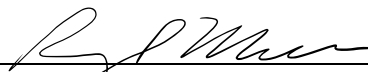
Amendment 80 fleet. It explains that the older data used in the economic models are unlikely to represent future conditions, and it acknowledges that the models fail to account for changes in fishing behavior that will occur in response to lower bycatch limits. For these reasons, the Final EIS specifically states that the outputs of the economic models the plaintiff cites are only useful “for comparison across alternatives” and are not “predictions of future [Amendment 80] revenues under each [bycatch] limit.”

38. Finally, to the extent the plaintiff claims that Amendment 123 will be devastating to the industry, I note that the Amendment 80 fleet made exactly the same claims in 2015 when the Council last reduced their halibut bycatch limits. At that time, the Groundfish Forum told the Council that its members were already “using all available means to reduce bycatch to the extent practicable,” and that the reductions then being considered “would be disastrous to Amendment 80 fisheries.” This did not happen. Instead, the Amendment 80 fleet was never actually constrained by the bycatch limits adopted in 2015, and the average annual revenues for the Amendment 80 sector actually went up since the lower limits were adopted. I believe the Amendment 80 fleet will continue to adapt and thrive under Amendment 123 as well.

39. In the end, the directed fishery in Area 4CDE has no future under a regime of fixed bycatch limits, as existed before Amendment 123. The individual fishermen and small operations the halibut fishery supports simply cannot survive in a world where bycatch limits for factory trawlers have no relationship to the health of the halibut stock; where the directed fishery faces continuing cuts to its allowable catch and the constant threat of preemption from bycatch; and where the entire burden of conserving the halibut population falls on individual fishermen. Amendment 123 gives us hope.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on the 4th day of February, 2024.



Raymond Alexander Melovidov