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Self
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RE: C6 Pelagic Trawl Gear Definition – Initial Review

The issue of unobserved bycatch needs to be further considered when discussing the impact of “midwater” nets contacting bottom. In written public comment submitted to the October 2023 NPFMC meeting, former NMFS employee Kristin Stahl-Johnson estimates that the nets of the larger trawl vessels in the Bering Sea sweep an area of 6 square miles per day. 6 square miles equals 167,270,400 square feet. So.....hypothetically.....if a trawl disturbed even 1 ounce of seafloor “life” per square foot drug, then a single vessel would be impacting 10,454,400 pounds of unintended seafloor life(aka unobserved bycatch) PER DAY. If those numbers are extrapolated out to a fleet of 30 vessel fishing 225 days per year, then the total unobserved bycatch/disturbance would equal over 70 billion pounds per year. 70 billion pounds per year of unobserved and un-accounted for bycatch, occurring for 30 years running, would add up to 2.117 TRILLION pounds of sealife lost but not accounted for in fisheries models. And THAT is how trawl, at this level of intensity, has the potential to crash entire fisheries and ecosystems(as it has already done multiple times). And, while I’ll be the first to admit that 1 ounce of un-observed bycatch per square foot drug is a TOTAL estimate(as are the fleet size and days drug), I challenge others to plug in ANY other hypothetical numbers to this equation and then see the results. If one assumed that even 1/100th of an ounce of life is disturbed per square foot drug, then it still equates to over 104,000 lbs of unobserved bycatch per vessel per day, or(assuming 30 boats fishing 225 days), 705 million pounds of unobserved bycatch per year for the fleet. We CANNOT continue to pretend that the unobserved bycatch number is 0. Continuing to do so is ignorant at best and criminal at worst.