

North Pacific Fishery Management Council

Dan Hull, Chairman
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April 24, 2017

Mr. Sam Rauch
Acting Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Rauch,

At its April 2017 meeting, the Council received a presentation from the Alaska Fisheries Science Center on the prospect of a flat or reduced FY2017 Center budget. The Council discussed impacts of expected budget constraints on the quality of scientific information that is necessary to support its mission. Funding core research at the AFSC should be a high priority for the agency, and the Council strongly encourages NMFS to fully fund this research and to provide for an earlier release of discretionary funds to allow for survey charters that are critical to stock assessments and determination of annual catch limits.

As you are aware, the North Pacific Council is charged with stewardship of the largest and most complex fisheries in the United States. Our ability to support large, profitable harvests is directly linked to the quality of information we are provided about our fish stocks. Fishery stock assessments that synthesize and summarize information about the condition of fish stocks are fundamental Center products that serve as the Council's key source of information for making harvest recommendations. Any stock assessment is only as good as the information that goes into it. Reduced sampling effort results in statistically less precise estimates of abundance, and can cause bias in current and future stock assessments, particularly for species present in an area that is eliminated from survey sampling.

The impending reduction in vessels and sampling stations for this year's Gulf of Alaska bottom trawl survey, and potential loss of the 2018 Bering Sea slope survey, will likely have a negative impact on annual catch limit specifications for groundfish. The AFSC estimates that the reduction in the 2017 GOA groundfish survey stations will increase the coefficient of variation for groundfish biomass by an estimated 20% on average. The AFSC has also determined that the potential loss of a 2018 Bering Sea slope survey will greatly affect the assessments and management advice for deepwater species that are not adequately sampled by the shelf survey, including Kamchatka flounder, Greenland turbot, Pacific ocean perch, Blackspotted/Rougheye rockfish, and golden king crab.

These reductions in the quality of scientific information will ultimately be felt by the fishing community. From an industry perspective, annual updates on stock conditions allow fisheries to anticipate changes in supply and adapt their business plans to maintain a competitive position in the world seafood market. Any disruption, therefore, in the information about current and future stock conditions compromises the ability of fisheries management to establish reliable harvest limits, and the ability of the fishing industry to conduct its business. Reductions in revenue and workforce would be expected if harvest limits are reduced to account for uncertainty.

The Council understands that administration of Regional science budgets involves painstaking evaluation of competing considerations. However, the Council wishes to point out that its ability to identify and allow for appropriate harvest levels and minimize the prospect of foregone yield is directly affected by these decisions. We request that you fund core research at the AFSC as a priority, and to provide for an earlier release of discretionary funds to allow for survey charters to be conducted as planned.

Thank you, and I look forward to any communication on this important issue.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hull". The signature is written in a cursive, slightly slanted style.

Dan Hull
Chairman, NPFMC

cc: Dr. Douglas DeMaster
Dr. Jim Balsiger
Dr. Rick Methot