

North Pacific Fishery Management Council

Dan Hull, Chairman
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October 17, 2017

Mr. Chris Oliver
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910
Via email: CHRIS.OLIVER@NOAA.GOV

Dear Mr. Oliver,

Since 1976, the North Pacific Fishery Management Council has led the world in its exemplary stewardship of the groundfish resources under its jurisdiction, resulting in sustainability and profitability of the largest and most complex fisheries in the Nation. The foundation for this success is the robust scientific basis upon which harvest limits are established each year for target groundfish stocks and stock complexes. The NMFS Alaska Fisheries Science Center provides high quality scientific information, ranging from basic research data on life history parameters to rigorous, state-of-the-art stock assessments.

Fundamental to preserving our standards of sound management based on robust science is the quality of data that support the analyses upon which we base our decisions. Our letter to Sam Rauch, sent in April of this year (attached), highlighted the relationships between high quality data products, robust analyses and profitable fisheries. It also emphasized that the Alaska groundfish fisheries are the largest and most complex in the nation. Alaska fisheries account for over half of U.S. fisheries catch, and are worth \$1.5 billion dollars in ex-vessel value. In the April 2017 letter, we appealed to NMFS Headquarters to expedite release of funds to support core functions of the AFSC, particularly the trawl surveys that provide indexes of stock size for our most important fisheries.

Unfortunately, funding was not made available, and this year, only 536 of a total 825 survey stations were sampled in the GOA because funding was only able to support deployment of two survey vessels instead of the needed three. Additionally, and also quite unfortunately, this reduction in survey funding occurred just when alarming evidence came forward of a significant drop in Pacific cod abundance in the Gulf. Researchers at the AFSC worked especially hard to explain this event in the context of stock production and ecosystem processes, but many livelihoods will no doubt be affected by this event.

It is possible that some of the impending economic losses could be offset by adjusting catches of other target stocks, but this will likely provide marginal relief. The precarious position some fishing operations may find themselves in make it all the more important to ensure that access to fishing resources is not hampered by increased uncertainty in stock condition. Precautionary reductions in ABC that occur as information quality diminishes are built into the North Pacific approach to management. However, that approach also depends on the continual availability of quality data. In fact, it is the recommendation of our Scientific and Statistical Committee that full surveys be conducted annually in the Gulf of Alaska and Bering Sea given the huge monetary and social costs of having a major, unexpected decline in a fishery.

At this time, we re-iterate our plea that funding of critical survey work be restored basic standards in the North Pacific, so that we can closely more closely monitor the recovery of Pacific cod stock, and prevent foregone harvest of other important stocks that affect the viability of our affected fishing communities.

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, flowing style.

Dan Hull
Chairman, NPFMC

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

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Chris Oliver, Executive Director



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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.

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