



North Pacific Fishery Management Council  
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Anchorage AK 99501

May 23, 2021

Dear Chairman Kinneen,

On behalf of the Alaska Longline Fishermen’s Association (ALFA), I am submitting these comments on agenda item **D-2 sablefish overages**. Thank you for accepting our comments and initiating discussion of the trawl sablefish overages.

ALFA members continue to be concerned about the long-term health of the sablefish stock. We recognize the Council has set ABC well below max ABC for the past two years and that the Council considers the 2021 ABC to be conservative. We would note that the spawning biomass trend, as depicted in the figure below from discussion paper, documents a long-term downward trajectory since the 1970s. Each time strong year classes have entered the stock the Council has responded with quota increases and stock abundance has responded by dropping ever lower. We are hopeful that that sablefish spawning biomass will rebuild over the next five years, but we continue to highlight our concern—along with concerns documented by stock assessment authors in the risk table below-- to urge caution in managing sablefish stocks.

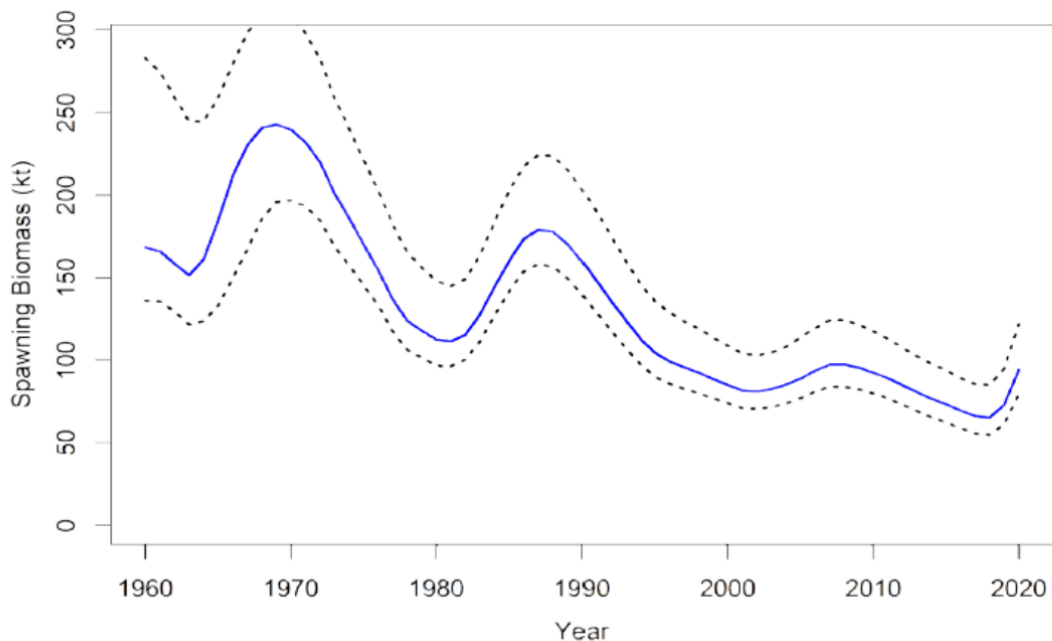


Figure 2: Discussion paper on sablefish overages

**Table 1. Risk table summary for the 2020 Sablefish assessment. From Goethel et al., 2020.**

Assessment Related Considerations	Population Dynamics Considerations	Environmental and Ecosystem Considerations	Fishery Performance Considerations
Level 3: Major concern	Level 3: Major concern	Level 2: Substantially increased concern	Level 3: Major concern

From our perspective, conservative management of sablefish stocks must include restricting harvest to pre-season specified TAC limits. When conservatively set sector catch limits are exceeded, the overall management is that much less conservative. The sablefish overage discussion paper identifies that the trawl sector has consistently exceeded its sablefish sector allocations for the past three years in the Bering Sea and Central Gulf, taking 479% of the Bering Sea allocation and 160% of the Central Gulf allocation in 2020. The 2020 Bering Sea overage alone resulted in the trawl sector discarding approximately 7 million pounds of sablefish. Despite these staggering numbers, the paper states that: “given the magnitude of recent large year classes, it is unlikely that moderate increases in catch of young fish will harm the stock” (page 8). The paper does not quantify “moderate increases,” but infers the 7-million-pound overage is not a resource issue. Given the tremendous concern raised by the small sablefish release amendment—which included the potential for approximately 2 million pounds of sablefish mortality—the dismissal of harm and concern in this discussion paper is more than a little surprising.

**ALFA member’s request the Council develop tools that hold harvest to catch limits and sector allocations. We believe both the status of the sablefish stock and the Council’s commitment to effective fisheries management demand such tools. ALFA also strongly recommends the Council revisit the sablefish careful release amendment in light of this discussion paper.**

Tools to consider

The discussion paper does a good job of identifying problems with all possible tools that could be developed to reduce trawl overages. Our membership was particularly struck by this line: “*When constraints such as high bycatch rates emerge, vessel operators do not have the option to cease fishing completely because cost accrual on such large platforms would be unsustainable.*” (page 14). The inference seems to be that these trawl boats are big, expensive to upkeep, therefore cannot be shut down. National standard 9 does not define “to the extent practicable” based on size or cost of operation—nor should the Council. Likewise, the paper identifies that “hot spot” closures to address high sablefish bycatch rates will not work because the trawl fleet is likely to catch more salmon or halibut if forced to move. ALFA notes that a fishery that is too big to shut down and too indiscriminate to operate without unacceptable bycatch of other species constitutes a threat to the resource and the fishing communities that depend on those other species and is in and of itself a problem the Council should address.

ALFA strongly recommends the Council develop incentives and/or penalties to address sablefish overages. We suggest the measures be bycatch rate based against target species and that exceeding identified rates trigger at least a short-term closure of the directed fishery, coop or

sector that has exceeded the specified rate. In the absence of incentives/penalties, the overages can be expected to continue. Even if the Council does not identify a resource issue with current overages, the resource waste, inability to manage to sector specifications, and potential allocation issue associated with the overages seem reason enough to develop effective tools. If the Council waits to develop tools until a resource issue exists, the tools will likely be ready too late to prevent damage. Again, from our perspective, sablefish stocks remain vulnerable with a low spawning stock biomass; three years of sablefish overages and a 7-million-pound sablefish overage in one management area in one year IS a conservation concern and management failure that deserves Council attention.


### **Small sablefish release**

On the topic of releasing small sablefish: ALFA would expect a measure of consistency between Council documents. The fixed gear fisheries harvest larger fish on average than the trawl fisheries, but the sablefish killed and discarded in the trawl fisheries also include a range of sizes. With 50,000 tags recovered from sablefish hooked and released in the fixed gear sablefish fishery, survival is undeniably high. Nevertheless, the small sablefish release document flagged substantial resource and annual catch limit concerns associated with allowing fixed gear fishermen to release what might have resulted in 2 million pounds of small sablefish mortality. There are demonstrated market benefits to processors and harvesters of allowing careful release of small sablefish and clearly no resource issues associated with release based on this overage document, given the determination that 7 million pounds discarded from one area in one year does not create a conservation concern. With this in mind, we ask that the Council direct staff to revise the small sablefish release document and that you schedule action on the small sablefish release amendment for later this year.

In closing, ALFA urges caution in managing the sablefish stock given the low spawning biomass level that the heavy dependence of current catch limits on year classes that remain at best partially mature. We request that the Council develop tools to restrain future catches to established sector allocations and we recommend consideration of a rate-based incentive program associated with short term closures as needed to prevent overages. Finally, given the determination that substantial overages in the trawl fishery do not pose a resource issue, we ask that you direct staff to revise the small sablefish release document to incorporate this determination and schedule action on the amendment.

Thank you for the opportunity to comment.

Sincerely



Linda Behnken  
(Executive Director)