



North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
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July 14, 2020

Dr. Robert Foy
Alaska Fisheries Science Center
7600 Sand Point Way N.E. Building 4
Seattle, Washington 98115
Via Email: robert.foy@noaa.gov

Dear Dr. Foy:

Thank you for providing a report to the North Pacific Fishery Management Council (Council) in June regarding the cancellation of Alaska's groundfish surveys in 2020. On behalf of the Council, I am writing to request that the AFSC provide the Council with an update on 2021 survey planning at its October 2020 meeting, and a more comprehensive plan for conducting all planned 2021 groundfish surveys, including the Northern Bering Sea, at its December 2020 meeting. We understand that plans will need to be flexible to accommodate any unexpected changes moving into the spring of 2021 and we would request timely updates as any of these plans are revised.

The Council is very concerned with the cancellation of five of six large-scale NOAA assessment surveys in federal waters off Alaska this year due to COVID-19 and any implications of 2021 survey planning moving forward. These surveys serve as our fundamental data source to support groundfish stock assessments and ecosystem assessments, and are the most critical responsibility of the AFSC to meet its mission of monitoring the health and sustainability of living marine resources and their habitat. Given the ample opportunity to plan for a similar situation next year, the Council requests an understanding of how NOAA intends to provide for a full set of surveys in 2021.

There may be significant consequences of not conducting surveys in 2020, and these consequences will be more severe if the 2021 surveys are not completed. At our June meeting, the SSC noted that loss of the 2020 surveys will increase uncertainty in stock status and projections and may necessitate larger buffers between overfishing limits (OFLs) and acceptable biological catches (ABCs). Groundfish and shellfish assessments in the BSAI, especially for short-lived species and species without an age-structured assessment, are likely to be most affected. As you indicated at the June meeting, the lack of surveys may substantially affect uncertainty, particularly for the following stocks: Bristol Bay red king crab, EBS snow crab, EBS pollock, EBS Pacific cod, AI Pacific cod, BSAI Atka mackerel, BSAI blackspotted/rougheyed rockfish, and BSAI Greenland turbot. These are primary species in the North Pacific, encompassing valuable crab stocks sensitive to changing environmental conditions and variable in abundance and biomass, and groundfish species that comprise more than 82% of the total allowable catches of groundfish in the BSAI in 2020. Rapidly changing distributions and populations in recent years, particularly for Alaska pollock and Pacific cod, increases the importance of the baseline survey effort. Yet the Council hopes that our long survey time series and the AFSC's significant investments in modeling and other data sources will temper the effect of one missing survey year.

Given the potential direct impacts of the 2020 surveys being cancelled on U.S. federal fisheries and ecosystem assessments, the Council requests a plan for stock assessment surveys in 2021, including the Northern Bering Sea. We understand the full suite of surveys for FY21 would necessitate 5 to 6 vessels to cover three geographies: one vessel for the Northern Bering Sea; two vessels for the Eastern Bering Sea, and 2 to 3 vessels for the Gulf of Alaska. At the request of the AFSC, the Council's SSC has also shown a continued interest and willingness to provide ongoing technical assistance in discussing survey priorities should funding or other resources be a constraint, and the Council appreciates continued dialog with the AFSC regarding survey planning and priorities.

Overall, the survey plan for 2021 should provide for contingencies due to the uncertainties related to vessel operations, labor, and funding. Given the presentation received in June, it seems prudent to consider planning for more resiliency in the survey process surrounding labor, as this appeared to be a major impediment to undertaking surveys this year. We ask the AFSC to explore all possible alternatives to avoid being in the same situation in 2021, for example, the use of federal fishery observers (as allowed under the observer contract), training other biologists from the AFSC to work at sea, obtaining field sampling assistance from scientists at other science centers or agencies, or contracting for at-sea scientific help. We also request the survey plan be clear about the funding scenario for 2021, including the status of funding saved from not undertaking surveys this year and the \$2 million received in Congressional appropriations specifically for maintaining historic survey coverage off the Pacific Northwest and Alaska in 2020.

The Council appreciates the agency's attempt to use other tools and approaches to collecting data necessary to support stock assessments. Dr. Cisco Werner at both the November 2019 and May 2020 CCC meetings provided an overview of the types of tools that NOAA is developing to extend our current abilities to track changes at the ecosystem scale and in fish populations. Similar to our previous request of Mr. Chris Oliver (November 22, 2019 letter), we encourage NOAA to devote the resources necessary for further development and implementation of these new tools, but only as long as those efforts do not diminish our current at-sea survey capabilities. Although the CCC and the North Pacific Council support enhancement and continued testing of the use of unmanned technology or modeling to supplement at-sea survey capability, these technologies should not be considered a near-term replacement for our current surveys, and we request that survey funding not be diverted to develop or test these tools. Any new technologies will need to be tested and coordinated with traditional surveys to ensure that scientific integrity is maintained. This will take time and additional funding. We encourage NOAA to continue working with the industry on cooperative research opportunities.

The Council urges NOAA to consider the critical importance of collecting scientific information to ensure we provide for optimum yield from Alaska's fisheries consistent with the Magnuson-Stevens Act and the direct link between surveys and NOAA's primary message through the recent Executive Order Promoting American Seafood Competitiveness and Economic Growth, to increase domestic production of seafood. The Council has consistently requested the necessary allocation of vessels and ship time to properly assess the Nation's largest groundfish fisheries, and has encouraged contracting options, where possible, with industry vessels to supplement NOAA surveys. The Council and our SSC have emphasized that surveys are a critical ongoing monitoring need for the Council and are the highest priority for research identified by the Council annually. We understand the need to proceed carefully and implement protocols to protect the NOAA workforce, industry, and communities in a pandemic environment; our entire Alaska seafood industry is facing similar challenges.

The Council is very appreciative of your efforts to inform the Council and the public of the difficult decisions and balances involved in the decision to cancel 2020 surveys and remains hopeful that the agency will be able to use the additional time and resources provided to it in 2020-2021 to complete the planned suite of stock assessment surveys in the North Pacific in 2021. We look forward to receiving an update on 2021 survey planning and funding from you in October and a more comprehensive report at the December meeting.

Sincerely,



David Witherell
Executive Director