

December 9, 2010

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. Jim Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

RE: Agenda item C-7  
2011-2012 Groundfish Quota Specifications

Dear Chairman Olson, Dr. Balsiger, and Council Members:

Each year, when you authorize the groundfish fisheries that capture billions of wild fish from the Bering Sea, Aleutian Islands, and Gulf of Alaska, that decision leads to significant impacts on the marine ecosystems off Alaska. We are concerned that current and proposed commercial fishing activities authorized by the National Marine Fisheries Service (NMFS) and North Pacific Fishery Management Council do not adequately account for ecosystem needs, continue to jeopardize the recovery of Steller sea lions, and hasten the decline of Northern fur seals.

You have considerable flexibility when setting fishing quotas each year, and you should use that flexibility to better account for ecosystem needs. In the Bering Sea/Aleutian Islands (BSAI) and Gulf of Alaska (GOA), optimum yield (OY) was set as a range of values as a coarse check on fishery removals across varying ecological and ecosystem conditions. The upper OY cap should not be treated as a target to "fill" each year. Given the effects of fishery removals, particularly on endangered species, you must carefully consider what you allow to be removed from the ecosystem in 2011 and 2012.

We do commend you for the significant advances in precautionary fisheries management that will result from setting Overfishing Limits (OFLs) and Annual Catch Limits (ACLs) for sculpins, skates, octopus, and squids that were formerly lumped into the 'other species' categories in the BSAI and GOA. However, species such as grenadiers as well as trailing amendments for forage fish still need to be addressed by the Council in the near future.

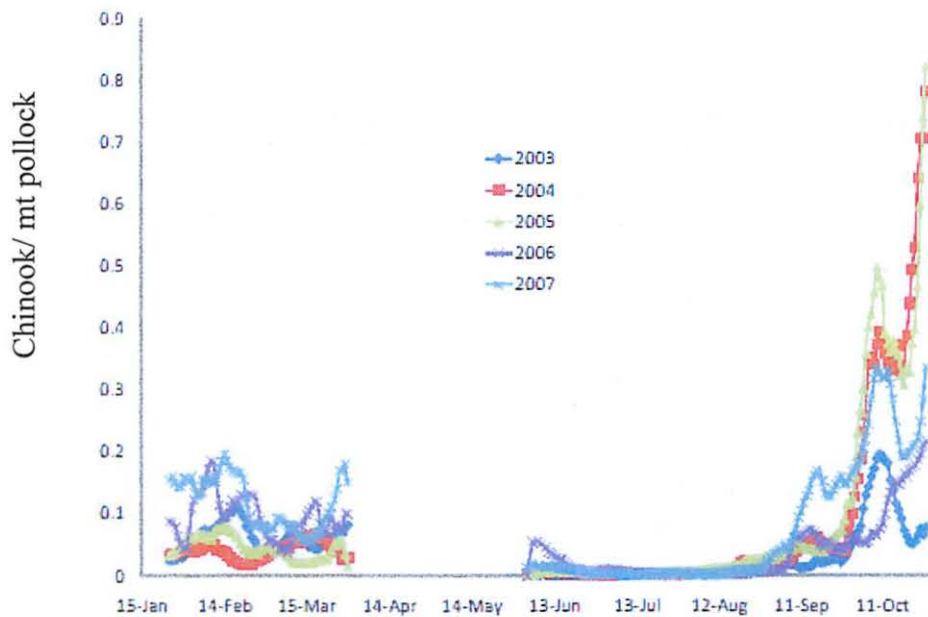
#### Eastern Bering Sea Pollock

Pollock play a central role in the Bering Sea food web, and it is the most intensely fished species in Alaska. While there appears to have been an increase in the EBS pollock biomass, there are many reasons to set a precautionary catch limit. Pollock biomass is still well below average. Most age classes, with the exception of the 2006 year class, are below average. In 2011, half of the spawning biomass will be composed of this 2006 year class (5 year-old fish in the 2011 fishery). Fishery removals in 2011 will further reduce the remaining year classes and result in an overly heavy reliance on the 2006 year class to sustain the population.

In addition, fishing for important prey species, like pollock is contributing to lower natality for endangered Steller sea lions through their range. This lower birthrate is evidence of the impact that these large-scale fisheries can have over long time periods. It is time to develop harvest

control rules for pollock that explicitly account for ecosystem needs. The B20 harvest control rule can, and should, be improved and integrated into the ABC control rule.

We are also concerned about the impacts to Chinook salmon that might accrue from a substantial increase in pollock quota. This upcoming 2011 season will be the first year of a highly complex program to reduce Chinook salmon bycatch in the EBS pollock fishery. We are hopeful that this program will be successful, but the higher pollock quota proposed will make it a challenge to reduce salmon bycatch. The increased quota will push the pollock fleet into trawling during the fall, when the rate of salmon bycatch is the highest. The last portion of pollock quota caught during the “B” season comes with an increasingly higher rate of salmon bycatch the further into the fall the fishery progresses (Figure 5-32 below).<sup>1</sup>



There will be a lot of attention in 2011 focused on the performance of the salmon bycatch reduction program, and you can take steps here to help that program by reducing the pollock quota.

#### BSAI Pacific cod

For several years now, we have heard about the need to assess and manage the Aleutian Islands cod stock separately from the Bering Sea cod stock. Today, this need is more apparent than ever. The 2010 trawl surveys in the Bering Sea and Aleutian Islands show divergent trends in the Pacific cod biomass. In the Bering Sea, the cod biomass estimated from the trawl survey has increased. However, in the Aleutian Islands, the cod biomass estimated from the trawl survey has decreased by 26% since 2006 and is the lowest estimate on record.

It is clear that without an Aleutian Islands Pacific cod stock assessment, you do not have the information needed to best manage fisheries in the Aleutian Islands ecosystem. The need for this assessment, and a management structure to respond to it, has been apparent by the need to

<sup>1</sup> Bering Sea Salmon Bycatch EIS Draft EIS/RIR/IRFA – December 2008.

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modify protections for Steller sea lions in the Aleutians. We support sustainable cod fisheries in Alaska, and better information will help achieve that goal.

We are encouraged that the BSAI cod split is on the agenda for the February 2011 NPFMC meeting, and we urge the Council to move forward with alternatives for a management framework while a stock assessment is being developed.

We look forward to working with you to maintain the health, productivity, and biodiversity of the North Pacific marine ecosystem while maintaining fishing opportunities and vibrant coastal communities.

Sincerely,



Susan Murray

Director, Pacific  
Oceana

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-7(b) GOA Catch Specifications

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Juriz Benny	AADB
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.