



North Pacific Fishery Management Council
605 W. 4th Ave, Suite 306
Anchorage, AK 99501

RE: C1 MRA Adjustments Analysis

Dear Chair Drobnica and Council,

On behalf of the Alaska Marine Conservation Council (AMCC) and our community of fishermen, community members, and fisheries advocates, thank you for the opportunity to comment on the MRA Adjustments Analysis. AMCC aims to protect the long-term health of Alaska's marine ecosystems, sustain our fisheries, and support vibrant fishing communities.

As an organization rooted in Alaska's working waterfronts, AMCC supports regulatory improvements that reduce waste, enhance clarity for fishermen, and sustain the long-term health of fishing communities. We recognize that the current MRA rules can cause unnecessary confusion and waste, and we see real value in efforts to clarify definitions of fishing trips, offload requirements, and accounting rules. Clearer regulations lower compliance risks, especially for small-boat operators who lack the legal and administrative support available to larger fleets. We also believe that well-designed changes can help decrease regulatory discards and enable fishermen to fully utilize what they responsibly catch. Similarly, creating exemptions in genuine emergencies, such as severe weather, mechanical failure, or medical incidents, serves as a practical safeguard that protects both fishermen and their families.

At the same time, we have serious concerns about parts of the proposed changes that could encourage behavior harmful to both communities and ecosystems. Expanding offload-to-offload or annualized accounting creates opportunities for topping off, where vessels extend fishing trips or shift effort into sensitive areas to maximize allowable retention of bycatch. Such practices benefit larger industrial vessels that can fish farther away and for longer periods, while disadvantaging small-boat operators whose trips are shorter and closer to shore. This change in incentives could not only limit community access but also put more pressure on areas vital for ecosystem health.

These concerns also affect the wider ecosystem. Increasing allowable retention in certain zones through the proposed changes could weaken decades of precautionary management aimed at preventing localized depletion and protecting predator-prey relationships. Alaska's fishing communities depend on healthy, resilient ecosystems. Weakening these protections in pursuit of market-driven flexibility could threaten both ecological balance and the long-term sustainability of our fisheries.

For these reasons, AMCC urges the Council to proceed with the parts of the package that clearly benefit all fleets, such as clarifying definitions and creating narrowly tailored emergency exemptions, while rejecting or significantly modifying proposals that allow topping off on bycatch species. If the Council considers expanded offload-to-offload accounting, we strongly advise including strong monitoring and precautionary safeguards to prevent increased retention derived from concentrating fishing effort in ecologically or socially vulnerable areas. Above all, we encourage the Council to view these decisions through a community lens by asking whether proposed changes genuinely support small-boat fishermen, local processors, and coastal communities, or if they primarily ease constraints for the largest fleets.

We appreciate the Council's leadership in making Alaska's fisheries a global model of sustainability, and we believe that model is strongest when it balances efficiency and flexibility with fairness, precaution, and community resilience. By rejecting measures that incentivize topping off and tailoring MRA adjustments to support small-boat operations and healthy ecosystems, the Council can continue to set the standard for responsible fisheries management.

Respectfully,

Michelle Stratton

Michelle Stratton
Fisheries Scientist
Executive Director

A handwritten signature in black ink, appearing to read "Jamie O'Connor", with a stylized, flowing script.

Jamie O'Connor
Deputy Executive Director