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Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 W. Third Ave, Suite 400
Anchorage, AK 99501

October 2, 2026

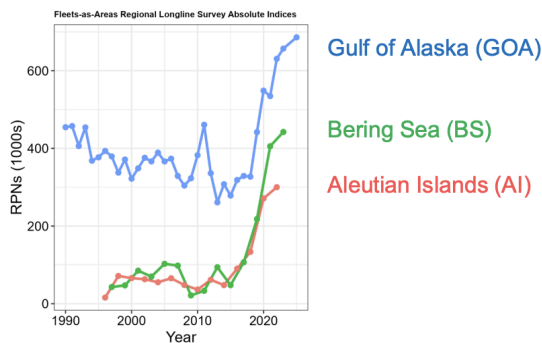
Dear Chair Drobnica and members of the SSC,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA) on the sablefish stock specifications for 2027.

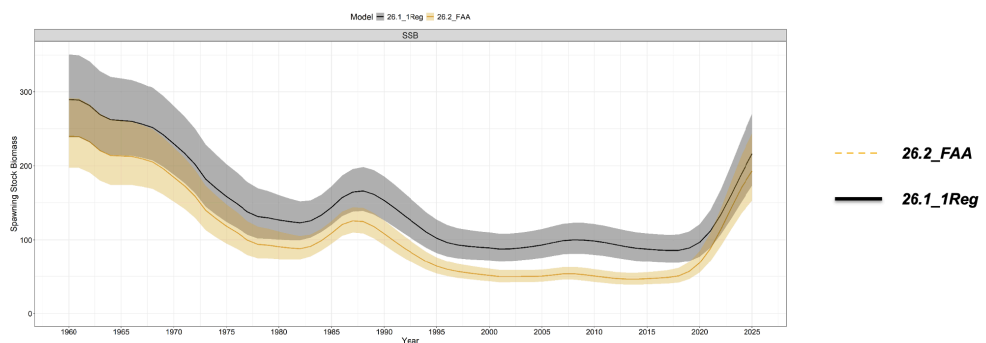
Introduction

In September, the sablefish stock assessment authors proposed several model and methodology changes for consideration by the Plan Team. These changes result in a potential overall reduction in the sablefish ABC of 32%—not because the status of the stock has changed, but because the assessment authors are changing models and methodologies. While the changes may be technically defensible, the magnitude of the change and the underlying assumptions that flow from these changes about the past status of the stock are difficult for our organization to accept. **We ask that the SSC and Council direct the sablefish stock assessment authors to develop alternative methods for consideration in December as the basis for the 2026 assessment and 2027 specification process.** We ask this with full confidence that the sablefish biomass is robust and continuing to increase, and that the recommended changes are NOT in response to a conservation issue.

LLS Relative Population Numbers (RPNs)



Time series trend: spawning stock biomass



To quote the presentation to the Plan Team: “Change in ABC across model options IS NOT due to a biological change/concern, just an update of the model structures.” And the Assessment:

“Overall, the sablefish age structure continues to gradually expand as the recent large year classes (e.g., 2014, 2016, and 2017) begin to enter ages that are nearing full maturity. For instance, the 2014-year class is now 12 years old, while the larger 2016-year class is 10 years of age. It is expected that these cohorts will continue to survive in large numbers and help expand the age structure over the next 5 – 10 years.”¹

Status of the Fishery

Before delving into the model and methodology changes, it is important to remember the context of these recommendations. For the past six years, ALFA and others in the IFQ fishery have repeatedly asked the SSC, AP and Council to set conservative catch limits, citing the risk to the stock and the industry of rapid changes in harvest levels. The Council heeded this advice for a number of years, then quadrupled the sablefish quota over approximately five years, an increase that resulted in excessive harvest of small, immature sablefish, a dramatic drop in market value, and an industry that could not afford to harvest and process what had previously been one of the most valuable fisheries in the North Pacific. In the past two years, the strong year classes of small fish have finally grown to a marketable size, prices have crept back up, and the fleet is once again making a living fishing sablefish—at least in the Gulf of Alaska. To now contemplate a model-driven dramatic reduction in sablefish catch limits, just when the industry is finally finding a measure of stability, seems like the epitome of poor management, the antithesis of climate resilient decision-making, and a cruel joke on those who have endured the past decade in this fishery. Again, the sablefish biomass is increasing—the identified reductions are not a response to a conservation issue.

Model and method changes

I do not pretend to understand the sablefish model. That said, it is clear from the stock assessment authors presentation to the Plan Team that: 1) they expect to continue to operate in data poor environment; and 2) the retrospective evaluation flowing from current assumptions accepts that there were roughly half as much sablefish in the North Pacific in 2005-2015 as scientist thought there were at that time. ALFA takes issue with both assumptions.

First: this is a valuable resource with an annual harvest value of approximately \$96 million. It is the highest valued finfish per pound in Alaska.² This resource should be

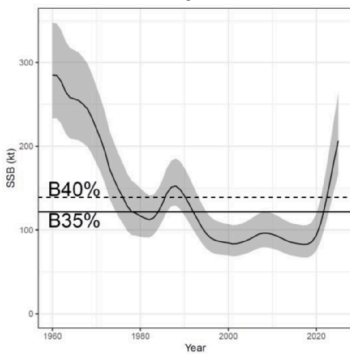
¹ https://drive.google.com/file/d/1gqZJMDWLI5HTc_cITPUVrDGEMHHWfzl6/view

² <https://www.fisheries.noaa.gov/alaska/science-data/alaska-sablefish-fisheries-and-assessment>

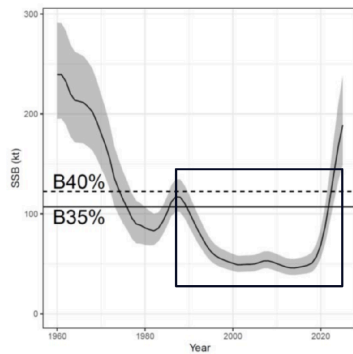
surveyed every year. If the survey cannot pay for costs, then NMFS should partially fund the survey. Likewise, managers should not accept the absence of commercial CPUE data; NMFS should develop a pot CPUE index, collect the data that is painstakingly recorded by fishermen, and use that data to inform the stock assessment process. Stock assessment authors explained to the fleet that “the recommended Model 26.2_FAA produces a lower 2026 ABC of about 32,000 tons. That is about 18% below what Model 25.12 would recommend and about 32% below the 47,000-ton ABC currently in place for 2026. The main reason for the difference is that the recommended model does not treat carried-forward survey values as if they were new observations.” (Lunsford, pers. comm). ALFA deeply appreciates this outreach and explanation from the stock assessment authors, but we would point out that changing the way carried forward survey values are incorporated is a choice; it is also a choice necessitated by the absence of a comprehensive survey. Changing methods dramatically to account for the lack of data (and voluntarily dropping other data sources, such as the historic longline survey data and the GOA trawl data) is a poor response to data limitations. When faced with similar challenges, the International Pacific Halibut Commission developed new assessment strategies to fill in data gaps and identified alternative funding sources for the survey. For example, the IPHC ensured some sites in each area were surveyed every year (with the exception of Area 4B), as opposed to the sablefish survey, which currently misses whole ecosystems every year. Given the value of this resource, NOAA and the Council should not simply accept survey deficiencies that result in this level of sensitivity to methodology changes. ALFA expects a commitment to filling this data gap, if not with additional financial resources at minimum with strategic changes to the survey design. No doubt the cost of augmenting the survey is significantly less than the cost to the industry and fishing communities of substituting data estimates that result in this level of harvest reduction.

Second: if the new model is correct, then sablefish was half as abundant in 2005-2015 as scientists and the Council thought they were at the time. ALFA recognizes that survey and assessment methods are imperfect, but this is an unexplained and substantial suggestion of error. Given that the assessment during this time period was informed by annual longline surveys, historic longline survey data, and commercial catch per unit effort, hence requiring less data expansion, it is difficult to accept this retrospective projection as accurate. At minimum, the stock assessment authors should be challenged on this assumption and asked to more fully consider the implications.

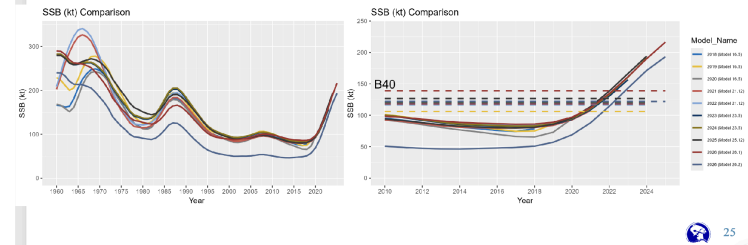
1 Region



FAA



Assessment History



(source: 2026_AK_Full_Sablefish_draft_SSC_M_growth)

Finally, we would point out that while the suggested changes to reapportionment reduce the impact on Gulf of Alaska areas, there is inherent contradiction in basing the reapportionment on the carried forward survey values when the stock assessment authors are stepping away from this approach in calculating overall abundance. The mismatch raises even more questions that remain unanswered by the stock assessment authors. ALFA would remind the SSC and Council that while the TAC is significantly under-utilized in the Bering Sea and Aleutian Islands, there are no doubt some quota share holders who catch all their quota and will be substantially impacted by a 50% IFQ reduction. For individuals who have recently taken on loans to purchase quota, that debt may now be unsupportable. In short, the impacts of these suggested model and method changes are real, significant, and for some potentially life-changing. If the changes were driven by conservation concerns, ALFA would accept these impacts. Given that there is currently a higher sablefish spawning biomass in the North Pacific than at any time since the 1970, ALFA maintains that there is time to reevaluate method and model changes before making them the basis for future management.

Conclusion

In closing, ALFA has a long history of advocating for conservative management of sablefish stocks and has repeatedly stated that major fluctuations in harvest levels destabilize the fishing industry and the fishing communities that depend on it. Climate change has only heightened the importance of building resilience into fisheries management because the resource is expected to become less predictable. The recent history of sablefish management, with rapid TAC increases that destroyed the value of the resource, could only be made worse at this point by dramatic reductions driven not by conservation but by model and method changes, which is exactly what is proposed. The industry is just this year reaching a level of recovery; introducing the potential for a 32% TAC reduction in 2027 throws the industry back into turmoil. Again, ALFA asks that the SSC and Council request that stock assessment authors prepare recommendations for December based on alternative methods.

We also ask that the Council and NOAA firmly commit to addressing gaps in the sablefish survey and stock assessment process, and we stand by to assist with that effort. At minimum, changes of this magnitude should be stair stepped in over a number of years, as has been implemented in this fishery for apportionment changes in the recent past.

Thank you for the opportunity to comment.

Sincerely,

Linda Behnken
Executive Director