



October 2, 2026

Angel Drobница, Chair
North Pacific Fisheries Management Council
1007 West 3rd Ave., Suite 400
Anchorage, Alaska 99501

Dianna Evans, Executive Director
North Pacific Fisheries Management Council
1007 West 3rd Ave., Suite 400
Anchorage, Alaska 99501

Re: Sablefish Stock Modeling

Dear Chairwoman Drobница and Director Evans,

My name is Bernie Burkholder, and I am writing on behalf of Endurance Fish Company, Buck and Ann Fisheries, and our associated harvesting vessels. I am writing to voice deep concerns across our harvesting, marketing, and quota finance sectors regarding the proposed assessment model changes for sablefish.

Sablefish stocks are currently exceptionally healthy. Catch Per Unit Effort (CPUE) is reaching all-time highs for our vessels and across much of the sablefish fleet, with overall biomass sitting at the upper end of historical limits. Despite these strong indicators, proposed Models 26.1 REG and 26.2 FAA would sharply drop the Acceptable Biological Catch (ABC) to 41,000 and 32,000 metric tons, respectively—a drastic reduction from the 47,000 metric ton base model benchmark used in 2025 and 2026.

While these new models may be considered scientifically credible, they remain untested in management application, and I feel a reduction of this magnitude is unwarranted. Constantly shifting model scenarios with immediate, fully weighted impacts create extreme volatility that the commercial fishing industry cannot absorb or plan around.

Modifications of this scale under consideration by the SSC would most certainly cause severe ripple effects across the entire sablefish sector:

- **Market Disruption:** Abrupt quota cuts will derail hard-won progress in developing and sustaining key domestic and international markets.

- **Financial Degradation:** Sharp reductions in ABC diminish sablefish quota share values, directly harming individual fishermen, coastal Alaska communities, CDQ groups, and lending institutions.
- **Operational & Economic Instability:** The inability to reliably construct multi-year fishing and financial plans threatens the long-term viability of Alaska's coastal communities and harvest fleet.

In a period where we have been issued Executive Order 14276 and we strive to obtain Maximum Sustainable Yield in our fisheries, I would ask these considerations be given serious positioning in the sablefish modeling process.

Key Recommendations:

1. **Maintain the Base Model:** Retain the single-region 26.1 model approach with carryover apportionment for current management decisions.
2. **Require a Prove-Up Period:** Do not fully weight new assessment models without a deliberate transition period. From the perspective of fishermen, processors, marketers, and financial institutions, abrupt model changes erode trust in fisheries management and undermine industry stability.
3. **Request CIE Analysis:** Request that stock assessment authors present the mortality sensitivity and recruitment bias analyses recommended by Center for Independent Experts (CIE) reviewers in November, allowing stakeholders to evaluate the extent to which the proposed ABC relies on these underlying assumptions.
4. **Align Apportionments and Allow Carryovers:** Better align regional quota allocations with actual spatial harvesting patterns and allow area-specific quota carryover in the Gulf of Alaska (GOA). While underharvesting remains a persistent challenge in the Aleutian Islands and Bering Sea, the GOA fleet routinely harvests a high percentage of its allocation. Failing to achieve Maximum Sustainable Yield in western GOA regions inflicts economic harm on local fleets and communities and risks artificially shifting quota over time to eastern regions based on traditional migration patterns.
5. **Ensure Full Council Process Transparency:** Specific stock or model concerns must be fully vetted through the complete NPFMC process. Deciding major model changes without public and user-group participation through the full Council process compromises transparency and runs counter to the spirit of the Council process.

Thank you for your time, leadership, and consideration of these critical industry concerns.

Sincerely,



Bernie Burkholder, Principle

Endurance Fish Company, LLC, Buck and Ann Fisheries, LLC, F/V Aleutian Endurance, LLC, F/V Northern Endurance, LLC, F/V Southeast, LLC and F/V Buck and