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October 2, 2026

Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

RE: C3 – Groundfish Harvest Specifications

Dear Madam Chair,

On behalf of the Freezer Longline Coalition (FLC), thank you for the opportunity to comment on the October 2026 Groundfish Harvest Specifications agenda item. Our comments address three stocks: Eastern Bering Sea (EBS) Pacific cod, BSAI Greenland turbot, and sablefish.

About FLC

The FLC members are the owners of 19 active hook-and-line catcher processor vessels that comprise the HAL CP sector of the federal Pacific cod fishery in the Bering Sea, Aleutian Islands and Gulf of Alaska. A majority Alaskan-owned fleet, FLC members include nine Alaska and Washington-based operators comprised of Community Development Quota (CDQ) organizations, an Alaska Native Corporation, and family-owned businesses. Five (of six) CDQ organizations are either FLC members or are partners in the fishery with FLC member companies. FLC-member fishermen are almost entirely dependent on the annual harvest of Pacific cod. Member companies employ over 1,500 crew on our vessels each year, with about 20-25 crew deployed on a vessel on a given trip.

The mission of the FLC is to promote public policy that facilitates the sustainable and orderly harvest of Pacific cod and other groundfish species. Our members frequently partner with the AFSC in support of research to better understand the Pacific cod stock, including satellite tagging and winter genetic samples used in recent EBS Pacific cod stock structure work.

EBS Pacific Cod

FLC supports the assessment author and Plan Team's recommendations that Models 24.1 and 26.1 be reviewed as the final assessment models for recommending OFL and ABC at the November 2026 Plan Team meeting. We commend Steve Barbeaux for an informative and thorough report and presentation.

Age-14 plus group (Model 26.1). The age-20 plus group is based on ages from a previous, and apparently invalid, ageing method. No Pacific cod older than age 14 have been observed since the updated ageing methodology began. The author's sensitivity analysis showed the change reduces model parameters and moves less than half a percent of estimated initial abundance into the plus group. The result is a simpler model with essentially unchanged population dynamics. As the Plan Team noted, the two November models differ only in the plus group and are likely to be very similar, which supports a stable transition.

Split-sex model. FLC also supports the author's recommendation to retain the single-sex model for the 2026 cycle. We accept that growth in Pacific cod is dimorphic; the sex composition data show females growing faster and to larger sizes. Our support for deferral rests on what the split-sex model currently delivers. Management quantities were similar between models, while the standard error of $F_{40\%}$ roughly doubled (0.018 in Model 26.2 to 0.038 in Model 26.3). We support the request that GAP produce split-sex survey age-composition estimates as a priority for the 2027 cycle, and the Plan Team's recommendation for continued exploration of split-sex models and alternative natural mortality parameterizations, considered together with selectivity.

Ageing capacity. We share the Plan Team's concern about reduced GAP capacity. Age data are central to the cod assessment, and we support the Team's emphasis on maintaining GAP capacity and communicating assessment schedules early enough for the program to plan its workload.

We ask that the SSC continue to weigh stability and predictability alongside scientific rigor, and that structural changes be adopted when the evidence and added realism support them, as is the case with the age-14 plus group.

BSAI Greenland Turbot

We thank Meaghan Bryan and colleagues for their extensive work on this assessment. FLC is concerned about the lengthy gap in data collection from the Bering Sea slope. The EBS slope survey was a key data stream for the turbot assessment, and it has not been conducted since 2016. Greenland turbot are more prevalent at depths the EBS shelf survey can't reach, so survey data come from the shallow edge of turbot distribution. This is why the 80% increase in the 2026 shelf survey turbot index amounts to 64 more fish, two-thirds of them from a single tow.

The reported target for a redesigned Bering Sea bottom trawl survey is approximately 2031. The redesign is intended to extend to at least 400 m, with test tows to 600 m. Survey staff were clear that this timeline is uncertain and that resources are not currently available to include deepwater stations before then. That would leave a gap of 15 years or more in slope data for this stock. There are also open questions about whether the redesigned trawl can sample effectively on hard bottom at 400 to 600 m.

We support the Plan Team's recommendation to emphasize to the SSC and Council the importance of deepwater survey stations and to include a research and data-gaps section in the November assessment. We ask the SSC to:

- Reinforce to AFSC that deepwater slope information is a priority for fisheries targeting Greenland turbot and other deepwater stocks.
- Encourage interim options to collect slope information as part of the survey redesign, including cooperative work with industry. Industry offered such help at the September meeting.
- Support collection of Greenland turbot otoliths on the AFSC longline survey, which the authors plan to explore.

Until slope data are again available, we suggest that catch advice support stability for fisheries, remain anchored to information from the period when the slope survey was conducted, rather than changes in shelf indices that sample the margin of the stock's distribution.

Sablefish

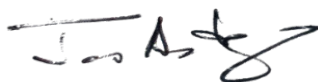
The September materials indicate that the FAA model produces an ABC roughly 25% lower than the updated single-region model, and about 32% below current specifications, with the Aleutian Islands share nearly halved and the Bering Sea down by about a third. A reduction of that size in a single year would be very disruptive to harvesters, processors, crew, and communities. Much of the change reflects a correction in model structure, the removal of extrapolated longline survey indices, rather than a newly observed decline in the stock.

FLC supports a gradual reduction in sablefish ABC if the fleets-as-areas (FAA) model, or a comparable change in model scale, is adopted for catch advice. Spreading the change over about three years, on the order of 10% per year all else equal, would reach the same scientific endpoint with far less disruption.

This issue was raised by the public at the September 2026 Joint Groundfish Plan Team meeting, although the Joint Plan Team report does not report it. Buck Laukitis (F/V Oracle) submitted a written comment to the Joint Plan Team asking that any FAA scale change be phased in over three years when translated into ABC and TAC. FLC supported a phase-in approach at the meeting and suggested that 2025 not be weighted heavily as a baseline for the regional apportionment. We ask that the SSC consider this input as it reviews the sablefish models, and that both FAA and single-region trajectories and the full set of projection scenarios continue to be shown so the size of any change is transparent.

Thank you for your consideration of these comments and for your continued work in support of sound, science-based fishery management. Please be in touch with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Armstrong", with a stylized flourish at the end.

Jim Armstrong
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