



ALASKA MARINE
COMMUNITY COALITION

October 1, 2026

North Pacific Fishery Management Council
1007 W. Third Avenue, Suite 400
Anchorage, AK 99501

Re: Agenda Item C3 – Groundfish Harvest Specifications

Dear Chair Drobnica and Council Members,

On behalf of the Alaska Marine Community Coalition (AMCC), thank you for the opportunity to comment at the North Pacific Fishery Management Council's (Council) Agenda Item C3 – Groundfish Harvest Specifications. AMCC is a fishermen-founded and fishermen-led organization dedicated to advancing sustainable fisheries, healthy marine ecosystems, and thriving fishing and subsistence communities across Alaska. Our work is grounded in the principle that fisheries management must be both scientifically credible and publicly accountable.

Specifically AMCC requests that the Council: (1) set groundfish total allowable catch (TAC) precautionarily, using available ecosystem information and incorporating additional buffers where ecosystem conditions and uncertainty warrant them; and (2) continue developing clear, measurable ecosystem considerations for harvest specifications and establish a framework that directly connects those considerations to management decisions.

I. The Council should set groundfish total allowable catch (TAC) precautionarily.

AMCC encourages the Council to use the best available scientific information to set groundfish TACs conservatively and sustainably, recognizing that groundfish fisheries operate within an interconnected ecosystem. Each year, to conserve and manage the groundfish resources, the Council reviews the groundfish harvest specifications of the annual catch limits for the Gulf of

Alaska (GOA) and the Bering Sea and Aleutian Islands (BSAI).¹ This process relies on the best scientific—biological and socioeconomic—information available.² The annual groundfish TAC-setting process considers ecosystem factors through a review of—among other materials—stock assessments, risk tables, recommendations from the Scientific and Statistical Committee (SSC), Stock Assessment and Fishery Evaluation (SAFE) Reports,³ and Ecosystem Status Reports (ESRs).⁴

However, while ecosystem-based fisheries management (EBFM) information is routinely presented to the Council through these processes, and precaution is built into the models, that information does not necessarily trigger a specific management response—particularly in the face of rapid environmental change.⁵ EBFM information should be tied to clear thresholds or decision rules that identify when ecosystem conditions must prompt changes to acceptable biological catch (ABC), TAC, spatial management, prohibited species catch (PSC) limits, or other management measures.

Although the alternative harvest control rules (HCR) discussion is not scheduled to return to the Council for action until May 2027,⁶ AMCC encourages the Council, during its annual TAC-setting, to use the EBFM information available to it and precautionarily set TACs to sustainably manage the groundfish fishery. The Council has authority to adjust annual TAC determinations based on, among other considerations “the multispecies and ecosystem impacts of

¹ 50 C.F.R. § 679.20(a)(1)-(3); *Alaska Groundfish Harvest Specifications*, NOAA Fisheries, <https://www.fisheries.noaa.gov/alaska/sustainable-fisheries/alaska-groundfish-harvest-specifications> (last updated March 11, 2026); Fisheries of the Exclusive Economic Zone Off Alaska; Bering Sea and Aleutian Islands; 2026 and 2027 Harvest Specifications for Groundfish, 91 Fed. Reg. 11750 (Mar. 10, 2026), <https://www.federalregister.gov/documents/2026/03/10/2026-04684/fisheries-of-the-exclusive-economic-zone-off-alaska-bering-sea-and-aleutian-islands-2026-and-2027>; Fisheries of the Exclusive Economic Zone Off Alaska; Gulf of Alaska; 2026 and 2027 Harvest Specifications for Groundfish, 91 Fed. Reg. 11902 (Mar. 11, 2026), <https://www.federalregister.gov/documents/2026/03/11/2026-04753/fisheries-of-the-exclusive-economic-zone-off-alaska-gulf-of-alaska-2026-and-2027-harvest>.

² 16 U.S.C. 1851(a)(2); 50 C.F.R. § 600.315.

³ *Economic Status Reports For The Gulf Of Alaska And Bering Sea/Aleutian Islands*, NOAA FISHERIES, <https://www.fisheries.noaa.gov/alaska/ecosystems/economic-status-reports-gulf-alaska-and-bering-sea-aleutian-islands> (last updated Mar. 25, 2026).

⁴ See e.g., *Ecosystem Status Reports For The Gulf Of Alaska, Bering Sea And Aleutian Islands*, NOAA FISHERIES, <https://www.fisheries.noaa.gov/alaska/ecosystems/ecosystem-status-reports-gulf-alaska-bering-sea-and-aleutian-islands> (last updated Feb. 12, 2026) (“The body condition (weight at given length) of adult pollock, Pacific ocean perch, dusky rockfish, and northern rockfish were below average (Prohaska and Rohan, p.130), and krill-eating humpback whales also had poor body condition (Gabriele et al., p.174).”).

⁵ RISK AND UNCERTAINTY IN THE GROUNDFISH AND CRAB HARVEST SPECIFICATIONS PROCESS AND DEVELOPMENT OF ALTERNATIVE HARVEST CONTROL RULES, N. PAC. FISHERY MGMT. COUNCIL 25 (May 2026) [hereinafter “ALTERNATIVE HCRs”],

<https://meetings.npfmc.org/CommentReview/DownloadFile?p=19788990-cc5d-4590-9557-7e96e7e924ba.pdf&fileName=E2%20Harvest%20Control%20Rules.pdf> (“In recent decades shifts in ocean conditions have had profound impacts on some groundfish and crab with associated impacts on the fisheries and communities that depend on them (Bigman et al., 2023; Suryan et al., 2021). These impacts are harbingers of future changes in fish and crab abundance under future environmental scenarios and thus inform consideration of more adaptive HCR frameworks.”).

⁶ *Harvest Control Rule Update*, JOINT GROUNDFISH PLAN TEAM (September 2026) [hereinafter “HCR Update”], <https://meetings.npfmc.org/CommentReview/DownloadFile?p=74f02faf-a3f0-446a-9a17-8135d32d744b.pdf&fileName=PRESENTATION%20HCR%20for%20Joint%20Groundfish%20Plan%20Team.pdf>.

harvesting the groundfish complex at current levels.”⁷ Thus, AMCC respectfully requests that the Council set groundfish TACs precautionarily, using the EBFM information already available to the Council (although limited). The Council should also incorporate additional buffers where ecosystem conditions and uncertainty warrant them. Ultimately, however, AMCC advocates that EBFM information must be more directly incorporated and tied to the TAC-setting process because, even when a single species is thriving and well managed on its own, the ecosystem around it may be struggling. The Council must keep working to take EBFM information into account.

II. The Council should continue developing and incorporating EBFM considerations for harvest specifications that are directly connected to management decisions.

Given the current limitations on directly incorporating EBFM considerations into TAC-setting, AMCC also encourages the Council to continue evaluating climate-robust and forecast-informed HCRs for select groundfish and crab stocks, including pollock, Pacific cod, and Alaska sablefish.⁸ Modified HCRs could improve management performance under changing environmental conditions by incorporating information about climate and ecosystem conditions into harvest decisions.⁹

This work is particularly important because current harvest specifications remain largely grounded in single-species stock assessment models. An individual stock can appear healthy while the broader ecosystem experiences significant stress. That stress can result from prey depletion at ecologically meaningful scales, cumulative pressure across multiple fisheries, localized effects on subsistence and small-boat fisheries, habitat-mediated changes in productivity, and increased risks to non-target species. And, as Council staff have noted, climate-resilient HCRs could better protect spawning biomass during climate shocks and longer-term changes in stock productivity, particularly given the North Pacific’s multiple marine heat waves over the past decade and associated biological and economic impacts, including on Eastern Bering Sea snow crab and GOA Pacific cod.¹⁰

The Council could evaluate alternative HCRs using metrics such as: recovery time following climate shocks; effects on prey availability and food-web relationships; bycatch and non-target species outcomes; habitat and spatial effects; subsistence and community fishing opportunities; distribution of conservation burdens and economic benefits; performance across multiple climate

⁷ 50 C.F.R. § 679.20(a)(3)(i).

⁸ See Council Motion E2: Climate Resiliency Work Plan - Harvest Control Rules, N. PAC. FISHERY MGMT. COUNCIL (June 9, 2026), <https://meetings.npfmc.org/CommentReview/DownloadFile?p=2601915c-6b23-41c2-a4ac-0fc9c42cb509.pdf&fileName=MOTION%20E2%20Climate%20Resiliency%20Work%20Plan%20-%20Harvest%20Control%20Rules%20.pdf>; see also ALTERNATIVE HCRs, *supra* note 5, at 2 (reviewing climate-robust or forecast-informed harvest control rules).

⁹ DEVELOPING CLIMATE-ENHANCED HARVEST CONTROL RULES FOR SPECIFYING ACCEPTABLE BIOLOGICAL CATCH, N. PAC. FISHERY MGMT. COUNCIL 1 (Dec. 2025), <https://meetings.npfmc.org/CommentReview/DownloadFile?p=5cdf80b0-a8d4-4ebd-9a38-93318f274a21.pdf&fileName=D4%20HCR%20overview.pdf> (“Climate resilient HCRs have the potential to perform better to protect spawning biomass for some species and stocks during climate shocks and under rapidly changing marine environmental conditions. This may improve the current HCRs that are specified under the BSAI and GOA Groundfish . . . fishery management plan (FMP) Tier systems.”).

¹⁰ ALTERNATIVE HCRs, *supra* note 5, at 2.

and recruitment scenarios; and the frequency and severity of management failures. These metrics would help the Council evaluate whether an HCR protects ecosystem function under a range of conditions, rather than relying primarily on average performance.

Once metrics are established, AMCC encourages the Council to connect EBFM information to management action. The framework should: (1) identify ecosystem thresholds or warning indicators; (2) determine what management actions each indicator can trigger; (3) document how those indicators affect ABC, TAC, spatial management, PSC limits, or other measures; and (4) explain publicly when managers take no action despite elevated ecosystem risk. This approach would create a clear connection between ecosystem research, monitoring, and management decisions and ensure that new information leads to meaningful management responses. Therefore, AMCC encourages the Council (and Ecosystem Committee) to continue evaluating alternative HCRs that account for ecosystem and climate-related changes that current assessments may not fully capture, and to develop mechanisms that connect this EBFM information to specific management actions. Strengthening the Council's existing EBFM framework in these ways can help ensure that harvest specifications respond not only to the status of individual stocks, but also to the broader ecosystem conditions that sustain those stocks and the fishing and subsistence communities that depend on them.

Accordingly, AMCC encourages the Council to (1) set groundfish harvest specifications precautionarily with the EBFM information it currently has (although limited); and (2) continue developing clear, measurable ecosystem considerations for harvest specifications that are directly connected to management decisions.

Thank you for considering AMCC's comments.

Sincerely,

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