



Southeast Alaska Fishermen's Alliance Reserve

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October 1, 2026

North Pacific Fisheries Management Council

Angel Drobnica, Chair

1007 West 3rd Ave. Suite 400

Anchorage, AK 99501

Sent via website E-Agenda

RE: Agenda C-3 Groundfish Specifications

Chair Drobnica,

The Southeast Alaska Fishermen's Alliance (SEAFA) is a small boat multi-species/multi-gear commercial fishing association representing our 330+ members involved in the salmon, crab & shrimp fisheries of Southeast Alaska and Longline fisheries in the Gulf of Alaska and SE state waters.

SEAFA understands that the Plan team is recommending the use of two new stock assessment models which shows a significant decrease in ABC even as there is an increasing biomass, strong recruitment classes and excellent commercial catch rates. We oppose the adoption an ABC for 2027 based on the new models or respectfully request as a minimum that you develop a phased in option of two to four years allowing for an opportunity to get new survey data and smooth out the economic harm to the commercial fishing industry.

The plan team presentation on page 11 and in the summary acknowledges and emphasizing **the proposed 32% coastwide reduction is based solely on the modeling shift and "the change in ABC is not due to a biological change/concern, but an update in model structures."**

We are also concerned that the new models appear to exclude commercial fishing logbook data and relies on survey data with reduced timing and coverage under the new survey protocols.

Sincerely,

Kathy Hansen
Executive Director