Alaska Marine Conservation Council

October 31, 2023

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

Mr. John Kurland, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

Re: Request for Information: Research Priorities Triennial Review

Dear Ms. Drobnica, Mr. Kurland and Council Members:

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's marine ecosystems which sustain vibrant fishery-dependent communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems.

AMCC appreciates the opportunity to comment on the process of identifying 2025-2028 Research Priorities. We encourage the Council to continue seeking information from the public early on in the process in subsequent triennial reviews. It is vitally important that research priorities are continually updated and research completed because the Council bases its management decisions on the rigorous analysis and best available science on stocks, ecosystems, fisheries and communities. We feel these critical components to management deserve renewed attention. Due to the rapidly changing climate and ongoing and unmitigated effects from fishing activity, status quo is insufficient.

When looking at the top ten Research Priorities selected for 2022-2024, AMCC strongly encourages these projects to be completed:

- #148: Spatial distribution and movement relative to life history events and fishing
    - Advisory bodies including the SSC and CPT have elevated this need for years and has been made particularly urgent by crab declines
- #189: Develop stock-specific ecosystem indicators and incorporate into stock assessments
    - The downturn of Pacific cod coincided with an increase in ABC/TAC of cod leading up to the warm-water year, to which the crash has been attributed; consideration

of increased harvest allotted through the specs process should be substantially weighted alongside ecosystem considerations that expand beyond single-species considerations

- #246: Cooperative research efforts to supplement existing at-sea surveys that provide seasonal, species specific information on upper trophic levels
    - In conjunction with #189, onramps should be evaluated for the consideration of predator health in determining the impacts of prey removals in the groundfish specifications process; we encourage urgent consideration of this due to fisheries impacts on species protected through the Marine Mammal Protection Act
- #611: Collection of socio-economic information
    - This should be expanded to include subsistence fisheries as well, utilizing information through the Subsistence Division of the Alaska Department of Fish and Game, as well as information shared through Tribal Consultation and other informal means, to support the development of Social Impact Assessments expected in a variety of upcoming actions
    - To the extent possible, economic information and analysis regarding the landings values and harvest values of single species harvested through various gear types, i.e. trawl/HAL sablefish, trawl/POT/JIG cod, trawl/gillnet salmon

In addition to the topics elevated as priorities in the last review cycle, we underscore the urgency of the following:

- #164: Effects of trawling on crab and benthic communities
    - Quantification of unobserved mortality must be developed and considered retrospectively, in accordance with National Standard 9
    - Species identified as benthic habitat in the Essential Fish Habitat review are considered with susceptibility and recovery rates that are arbitrary and do not reflect BSIA; some species named do not exist in the North Pacific, highlighting the problematic nature of borrowing models from a different (i.e. warmer and more fast-growing) ecosystem without diligent and precautionary adjustments; octocorals are evaluated differently from corals that attach to hard substrates, despite having similar susceptibility and recovery rates from disturbance
- #244: Collect and maintain time-series data on the community composition, production and biomass of benthic invertebrate and vertebrate fauna
    - This should be expanded to include sedentary megafauna, which contribute substantially to to ecosystem health and are particularly vulnerable to disturbance
- #615: Evaluate the interactions between fisheries and killer whales and sperm whales


    - Guidance from Groundfish Plan Teams has underscored the need to update DMRs; we are concerned
- #733: Climate change: Develop predictive tools to inform management options related to resilience and adaptation
    - As evidenced by climate-related challenges for marine species and fisheries managers, this priority should also include precautionary tools in addition to predictive tools, and be elevated from Strategic to Urgent

Creating a triennial list of Urgent and Critical research and monitoring needed as required by MSA to support fisheries management is an exercise that one is paying attention to our surroundings but the true importance comes from completing this research and implementing the results in the management process.

Thank you for considering our comments.

Respectfully,

Marissa Wisniewski (Wilson)

Executive Director