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EPA Meeting Public Comment
P. Testimony # 1
APRIL 2018

Staff Tasking
April 2018

Dear Chairman Hull and Members of the Council,

The undersigned groups and individual fishermen request action by the Council to limit pressure on the incoming year classes of small sablefish. Our concerns are both biological and economic.

As you are aware, the 2014 sablefish year class is currently estimated to be significantly higher than any previously estimated years class. Given the current low levels of sablefish in the North Pacific and historic recruitment trends, we consider this year class to be critical to rebuilding sablefish stocks and sustaining the sablefish fishery over the next 5-10 years.

Our concern is that excessive pressure on the small sablefish will undermine the rebuilding contribution. We are also concerned that harvesting too many as young, small fish will undermine the sablefish market for the next three years.

To protect against both these concerns, we request that the Council initiate a discussion paper to consider:

1. Suspending for 2-3 years (or until superseded by Council action) the requirement to retain ALL sablefish in the Alaska longline and pot fisheries, regardless of size, and concurrently implementing a careful release requirement; and,
2. Establishing a policy that limits increases in the Alaska sablefish TAC to no more than 10% per year for the next three years. Included in the discussion paper should be data to inform an updated DMR for sablefish in the Alaska longline and pot fisheries, with the intent of informing potential changes in retention regulations to allow the release of smaller sablefish. (See Stachura et al., 2012: *Estimation of discard mortality of sablefish in Alaska longline fisheries.*^[1])

Because early landings of sablefish during the 2018 season include a large percentage of 2-3 pound sablefish, we wish to convey a sense of urgency in our request. We ask that you initiate action at the April Council meeting.

Thank you for considering our request.

Sincerely,

Linda Behnken, Alaska Longline Fishermen's Association
Kathy Hansen, Southeast Alaska Fishermen's Alliance
Jim Erickson, Alaska Glacier Seafoods
Nicole Kimball, Pacific Seafood Processors Association

Stefanie Moreland, Trident Seafoods,
Dana Besecker, Besecker Seafoods
Joe Morelli, Seafood Producers Cooperative
Malcolm Milne, North Pacific Fishing Association
Charles McEldowney, Icicle Seafood
Bob Alverson, Fishing Vessel Owners Association
David Erickson, Stuart Island Fisheries
Doug Bowen, Alaska Boats and Permits
Megan O'Neill, Petersburg Vessel Owners Association
Robert J. Wurm, Kodiak Vessels Owners Association, Alaskan Leader Fisheries
Jeff Stephen, United Fishermen's Marketing Association

Carlos Schwantes, FV Kalliste
William Hankins, FV Chandalar
Dick Curran, FV Cherokee
Anthony Sine, FV Fortune
Jasper Allbrett, FV El Dorado
David Oen, FV Endurance
Harley Ethelbah, FV Jean C
Bea Miller, FV Tsiu
Ocean Mayo, FV Coral C
Ty Barkhoffer, FV Reiver
Steve Enge, FV Monarch
Mark Hoffman, Ocean Oasis
Henry and Tobias Robinson, FV Magia
Lando Echeverio, FV Kema Sue
Phil Wyman, FV Archangel



Bering Sea Elders Group

April 8, 2018

North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

*Delivered in person at the April 2018 Council meeting and via email to
shannon.gleason@noaa.gov.*

Dear Council members,

The Bering Sea Elders Group (BSEG) respectfully submits these comments on the April 2018 Discussion Paper: Review of Council Rural Community Outreach. BSEG thanks you again for the opportunity to take part in the Ecosystem Research Workshop last month in Seattle, and we appreciate the Council's efforts to draft this Discussion Paper.

BSEG is eager to broaden the opportunity for community involvement at Council and committee meetings. We believe it is important for affected communities to have regular input as part of the Council's process. BSEG encourages the Council to commit to an inclusive process that lets affected communities meaningfully participate in the Council and committee meetings. BSEG understands and appreciates the reality that Council meetings have full agendas, but we encourage the Council to incorporate community feedback in a way that does not put strict time limitations on community comments.

At the same time, it is important for the Council to recognize the burdens of participating in the Council process. For those of us who live in rural Alaska, traveling to the Council meetings is often prohibitively expensive. It requires not only the funds to pay for airfare and hotel, but also substantial time away from our traditional subsistence practices. In short, we must take time away from feeding our families in order to advocate for our ability to feed our families.

With that in mind, we encourage the Council to continue the issue-specific outreach as outlined in the Discussion Paper. It is particularly important to continue to have Council members travel to communities and engage directly with a broad cross-section of community and tribal members, many of whom cannot travel to Anchorage. In addition, we urge the Council to develop a more extensive community engagement strategy, which will provide broader opportunities for the Council and communities to share information.

In addition, BSEG recommends that the Council create a plan for ensuring that traditional knowledge informs Council documents and decisions. There is a large volume of Traditional Knowledge that has been documented from Northern Bering Sea communities that is relevant to the Council. BSEG and others would welcome the opportunity to work with the Council to

ensure that such knowledge appropriately informs Council processes. We understand that the Bering Sea FEP core document, as well as action modules, may provide this opportunity and we strongly encourage the Council to move forward in this direction. BSEG believes that collaboration and exchange of knowledge will lead to stronger management information and informed decisions. Furthermore, towards that end, BSEG recommends that the Council consider a co-production of knowledge approach that brings together both science and Traditional Knowledge through an equitable process.¹

Finally, BSEG encourages the Council to reaffirm its commitment to working with tribes and address tribal concerns. To this end, BSEG encourages the Council to have a direct link to tribal consultation conducted by NOAA, and specifically the National Marine Fisheries Service (NMFS) and should ensure that information from consultations is used in the Council's decision-making processes. We ask the Council to develop a framework that will give it access to consultation information on a regular basis.

BSEG thanks you for the Discussion Paper and we look forward to building a more robust relationship between the Council and our communities.

Quyana,

A handwritten signature in black ink, appearing to read "Fred K. Phillip". The signature is written in a cursive, slightly slanted style.

Fred Phillip, Ambassador
Bering Sea Elders Group

¹ Behe, C., R. Daniel, and J. Raymond-Yakoubian. 2018. Understanding the Arctic through a co-production of knowledge approach. Workshop at the Alaska Marine Science Symposium, Anchorage, Alaska, January 23-24, 2018.