



September 10, 2019

Chair Simon Kineen
NPFMC
605 West 5th Avenue
Anchorage AK 99510
Re: Bering Sea sablefish bycatch

Dear Chairman Kineen,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I am writing to express our extreme concern over the high bycatch of sablefish by the Bering Sea trawl fleet.

We understand from NMFS catch accounting staff that as of September 9th the trawl sablefish catch was 2,778 mt—**338%** over their allocation of 633 mt. This overage currently threatens the sablefish Overfishing Level (OFL)—in fact, current catch is only 433 mt below the OFL for the Bering Sea. While the fisheries and associated bycatch are starting to slow down, the mortality inflicted on this recovering stock and the risk of future OFL overages are untenable.

As you are well aware, reaching the OFL could trigger closure of all fisheries—directed and non-directed—to prevent overfishing of sablefish. We would expect NMFS to take every precaution to prevent overfishing of this valuable but vulnerable resource. Sablefish stocks have been at relatively low levels of abundance for the past five years, and the scarcity of mature sablefish remains a significant concern of the fixed gear sablefish industry. Indications of strong incoming year classes are encouraging, but the rate of survival of these immature fish to a sexually viable and commercially valuable size remains unknown. Our members, along with sablefish quota share holders, crewmembers and processors across the industry, are anxiously watching these recent year classes and actively avoiding small fish to protect the rebuilding potential of the stock. From the perspective of ALFA's membership, the amount of trawl inflicted mortality is unacceptable. We ask the Council to take appropriate action to control trawl sablefish bycatch.

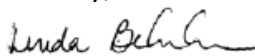
In order to provide a more complete picture of the situation, we would remind the Council that sablefish OFLs are set at the Gulf, Bering Sea and Aleutian Island level despite the stock assessment being Alaska-wide. This large area OFL distribution seems appropriate given the nature of the sablefish stock, and we would object to a fishery wide OFL without full review by the SSC and careful consideration by the Council. Our goal is to protect this valuable resource and to ensure that the high-volume trawl fisheries do not jeopardize the directed fishery.

Based on information we have received to date, half of the trawl sablefish bycatch is attributed to the AFA pollock fishery; the other half is attributed to the Amendment 80 fleet in the turbot, Kamchatka flounder and flathead sole targets. We expect trawl bycatch in the Gulf of Alaska is also a concern, but due to far lower observer coverage rates and months of non-retention, Gulf trawl sablefish mortality data are less trustworthy.

Below are NMFS overfishing closure regulations. Please note the vulnerability of the directed sablefish fishery to trawl allocation overages that trigger OFL. On behalf of ALFA's membership, we urge the Council to consider actions to control or curtail trawl sector sablefish allocation overages.

Thank you for your prompt attention to this issue.

Sincerely,



Linda Behnken
(Executive Director, ALFA)

Overfishing closure—(i) Notification. If, in making a determination under paragraph (d)(2) of this section, the Regional Administrator also determines that fishing for other target species or species groups in the area, district or part thereof where the notification applies, may lead to the overfishing of the species or species group for which the allocation or apportionment has been or will be reached, NMFS will publish notification in the Federal Register specifying limitations or prohibitions designed to prevent overfishing of that species or species group.

(ii) Limitations and prohibitions. These limitations and prohibitions may prohibit directed fishing for other species or species groups in the area, district, or part thereof where the notification applies, or may limit time, area, or gear types that may be used in directed fishing for the other species or species groups.

(iii) Factors to be considered. When making the determinations specified under paragraphs (d)(1), (d)(2), and (d)(3) of this section, the Regional Administrator may consider allowing fishing to continue or resume with certain gear types or in certain areas and times based on findings of:

(A) The risk of biological harm to a groundfish species or species group for which the TAC or PSC limit is or will be reached.

(B) The risk of socioeconomic harm to authorized users of the groundfish for which the TAC or PSC limit will be or has been reached.

(C) The impact that the continued closure might have on the socioeconomic well-being of other domestic fisheries.