North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
605 W. 4th Avenue, Suite 306, Anchorage, AK 99501
Phone 907-271-2809 | www.npfmc.org

November 22, 2019

Mr. Chris Oliver
Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
VIA email: chris.w.oliver@noaa.gov

Dear Mr. Oliver:

We note that 2019 was a watershed year in the North Pacific, highlighting scientific reports of unprecedented loss of sea ice, rising ocean temperatures, seabird die-off and marine mammal deaths. Impassioned public testimony to the Council also provided poignant first-hand observations of changes in the environment - dead birds, whales, pre-spawning salmon literally washing up on the shores of Bristol Bay. Without annual surveys, the connections between such aberrant observations in coastal communities and the Bering Sea ecosystem could easily be missed and could prevent us from understanding how these observations may connect to the fisheries themselves. As a result, a lack of early warning signals would directly affect the Council's ability to sustainably manage fish stocks and achieve ecosystem-based fishery management. Standardized annual surveys provide baseline information from which we can respond to changes in species abundance and distribution in a timely fashion, and potentially avert a more serious crisis.

In recent years, environmental conditions in the Bering Sea and Gulf of Alaska have been well outside of historical norms. Such conditions make it difficult to accurately model ecosystems and fish stocks, as model efficacy is typically diminished when extrapolation is required beyond observed values. Annual surveys would provide us with a high-resolution dataset by which to incrementally improve models and to keep up better with capturing changes. In addition to the direct connection between assessment surveys and annual catch specifications, surveys yield other important data including species distribution, life history, information needed for high-quality determinations of essential fish habitat, and many other purposes that contribute directly and indirectly to sustainable fishery management.

The Council is gravely concerned that the magnitude and the speed of these changes in the Bering Sea and the Gulf of Alaska pose an existential threat to one of our primary missions: providing a reliable supply of 2.5 million metric tons of sustainable, quality seafood to Americans and to the global market. Because so much of the seafood consumed by US residents is imported, threats of this magnitude to the US supply of seafood must be taken seriously. The Council is equally concerned about the welfare of the peoples living in coastal communities, who are dependent on these ecosystems for the food to sustain their subsistence way of life and culture. Until now, through careful, sustainable management the Council has been able to provide the majority of America's seafood supply without impacting the subsistence culture of Alaska's native coastal communities and without degrading the integrity of these highly productive large marine ecosystems. The magnitude of change we are watching at present could seriously impair our ability to maintain this record, particularly if the science is not adequately funded to understand and predict the impacts of these environmental changes.

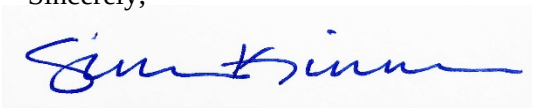
At the October 2019 Council meeting, Dr. Bob Foy provided a report to the Council and its Scientific and Statistical Committee (SSC) about the AFSC's science initiatives and surveys in the face of budgetary

issues and continuing environmental change. He emphasized the importance of a balanced portfolio between allocation of resources to surveys and process studies; we agree that pursuing one without the other will significantly impede our ability to sustainably manage Groundfish and crab in the face of increased uncertainty. Senator Murkowski recently included language in the Commerce, Justice, Science, and Related Agencies appropriations bill for Fiscal Year 2020 to prioritize and secure a $4.8 million increase in funding for fisheries surveys, data and stock assessments. She noted that cuts to surveys threaten to increase uncertainty in stocks assessments, reduce allowable harvests, and prevent us from understanding population dynamics under these new environmental conditions. She noted that we need strong science and management to ensure our fisheries are healthy and sustainable and that catches are the optimal size for our economy, communities, and marine ecosystems. While this costs money, the return on the investment is huge.

In a prior letter to you, the Council has expressed significant concern regarding the ability to fund the basic process studies within the Alaska Fisheries Science Center, particularly when combined with budgetary issues with funding surveys and other aspects of their mission. The Council remains very concerned regarding the implications of limited funding for basic science and the downstream impacts to our management process. The Council and stakeholders are continuing to consider other means to gather information, but the current resources appear inadequate for the future. Yet, with the on-going significant changes in ocean conditions in the North Pacific, we need more information not less. In consequence, the presentation by Dr. Cisco Werner at the recent CCC meeting provided an encouraging overview of the types of tools that NOAA Fisheries Science is working to develop to extend our current abilities to track change at the ecosystem scale and in fish populations. We encourage NOAA to devote the resources necessary to further development and implementation of these new tools, as long as those efforts do not diminish our current capabilities.

As was observed in the 2019 Bering Sea trawl survey, environmental conditions in the Bering Sea appears to have caused major changes in the distribution of pollock and Pacific cod. We encourage the agency to look ahead and plan for surveys and other tools to keep us abreast of these changes, and allow the collection of process data on an annual basis and support of basic process studies in the Northern Bering Sea area as well. We cannot emphasize strongly enough that rapidly changing distributions and populations in recent years increases the importance of the baseline survey effort, development of new monitoring capabilities, and the importance of process studies.

Sincerely,



Simon Kinneen
Chairman, NPFMC

Cc: Dr. Bob Foy, AFSC