

ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON STATEWIDE PACIFIC COD REGULATORY PROPOSALS

ALASKA BOARD OF FISHERIES MEETING ANCHORAGE, ALASKA

October 15-16, 2018



Regional Information Report 4K18-08

The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Fisheries (board) meeting, October 15–16, 2018, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

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ANCHORAGE, ALASKA**

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by
Alaska Department of Fish and Game

Alaska Department of Fish and Game
Division of Commercial Fisheries
333 Raspberry Road, Anchorage, Alaska, 99518-1565

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ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on agenda change requests. These comments were prepared by the department for use at the Alaska Board of Fisheries (board) meeting, October 15–16, 2018, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change, as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

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PROPOSAL 1 – 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Ron Kavanaugh.

WHAT WOULD THE PROPOSAL DO? Repeal the current AIS Pacific Cod Management Plan and replace it with the same management measures found in the DHS Pacific Cod Management Plan. The department interprets the AIS Pacific cod GHL allocation would remain unchanged starting at 27% of the Aleutian Islands subarea ABC.

WHAT ARE THE CURRENT REGULATIONS? During the state-waters season, when all waters of the AIS are open, vessel size limits are 125 feet or less for pot vessels, 100 feet or less for trawl vessels, and 58 feet or less for longline and jig vessels. Within the Adak Section, (state waters between 175°W long and 178°W long), vessel size limits are 60 feet or less for trawl, jig, and pot vessels, and 58 feet or less for longline vessels. There are no harvest allocations by gear type. All vessels are limited to harvesting no more than 150,000 pounds round weight of Pacific cod per day and may not have more than 150,000 pounds round weight of unprocessed Pacific cod on board a vessel at any time.

The DHS state-waters fishery is open only to vessels using pot gear that are 58 feet in length or less. There are no daily trip or retention limits, although vessels are limited to operating no more than 60 groundfish pots.

The DHS state-waters Pacific cod management plan restricts participation to pot vessels 58 feet or less in OAL. The fishery opens by emergency order 7 days following closure of the initial season for the federal Bering Sea and Aleutian Islands hook-and-line and pot catcher vessel less than 60 feet sector. Vessels can operate no more than 60 pots.

State-waters Pacific cod fisheries are classified as either superexclusive, exclusive, or nonexclusive. Currently, the AIS is a nonexclusive registration area for Pacific cod and the DHS is an exclusive registration area.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Only pot gear vessels 58 feet in length or less would be eligible to participate in the AIS state-waters Pacific cod fishery. All trawl, longline, and jig gear vessels would be excluded. Given the amount of historical regulatory change, confidential harvest information, as well as high variability in processing capacity and fleet composition, specific effects are largely unknown. In general, during years with adequate processing capacity, pot gear vessels 58 feet in length or less would benefit by having exclusive access to the entire AIS GHL. Shoreside or floating processors would also benefit as most pot gear vessels do not have onboard processing capability.

During periods of Pacific cod high abundance or limited local processing capacity, pot gear catcher vessels may not be able to harvest the full GHL resulting in foregone harvest. The current 150,000 trip limit would be removed, however a 60 pot per vessel gear limit would be established fleetwide.

This proposal would also change the AIS state-waters Pacific cod fishery to an exclusive registration area and shift the season opening date later in the year allowing eligible vessels to participate in both the federal Pacific cod season and the AIS state-waters season. Access to the

parallel fishery would improve for vessels not eligible to participate in the state-waters fishery. Pot gear vessels over 58 feet in length and all other gear types permitted to fish in the federal Pacific cod fishery would be eligible to operate inside state-waters concurrent to the AIS state-waters season provided the federal fishery is open to that gear type. The AIS state-waters fishery is the only state-waters Pacific cod fishery in the state that allows for trawl gear participation.

BACKGROUND: The AIS state-waters Pacific cod fishery opens on January 1 inside state waters between 175°W long and 178°W long to vessels 60 feet or less in OAL using trawl, pot, jig, and vessels 58 feet or less using longline gear. All state waters west of 170°W long open to the state-waters fishery for pot vessels 125 feet or less, trawl vessels 100 feet or less, and longline and jig vessels 58 feet or less, either 4 days after the Bering Sea and Aleutian Islands parallel A season for the catcher-vessel trawl fishery is closed, 4 days after the federal Aleutian Islands Subarea non-CDQ season is closed, or March 15; whichever occurs first.

The GHL for the AIS state-waters fishery is initially set at 27% of the federal Aleutian Islands Pacific cod ABC. The GHL for the 2018 season totaled 12,798,000 pounds. A total of 13 vessels participated during the 2018 fishery, including 8 pot gear vessels and 6 trawl gear vessels (Table 1-1); one vessel switched from pot gear to trawl gear during the season. The 2018 season was open for 81 days; harvest is confidential.

Since inception of the AIS state-waters Pacific cod fishery in 2006, vessels using longline, trawl, pot, and jig gear have been eligible to participate. Participation has fluctuated over time with only trawl and/or pot gear vessels participating the last 5 years (Table 1-2). The number of vessels along with vessel size for each gear type has varied since 2006 (Table 1-3). In recent years, most participating vessels were less than 60 feet in length (Table 1-3).

In 2018, pot vessels harvested 84% of the total AIS harvest in 100 trips, and trawl vessels harvested the remaining 16% in 19 trips (Table 1-4). Average CPUE for the season was 318 pounds per pot for pot gear vessels; whereas, trawl gear vessel CPUE averaged 10,016 pounds per tow (Table 1-4). The majority of pot vessels registered to fish between 61 and 75 pots (Table 1-5). Those vessels harvested 55% of the total AIS harvest (Table 1-6). Average CPUE for vessels using 60 or less pots was 261 pounds per pot, whereas vessels using more than 60 pots averaged 311 pounds per pot for the season (Table 1-7).

A vessel registered to take Pacific cod in an exclusive registration area may not be used to target Pacific cod in any other exclusive registration area during the same calendar year. Therefore, pot vessels 58 feet and less would be unable to participate in both the AIS and DHS fisheries in the same year. At least one pot vessel participated in both AIS and DHS fisheries in 2014, 2017, and 2018 (Table 1-8).

When the federal fishery is open the state opens a parallel fishery inside state waters mirroring most federal fishery regulations. Harvest during a parallel season is deducted from federal TAC. Federal Pacific cod seasons in the Bering Sea and Aleutian Islands subareas open and close by sector for the entire Bering Sea-Aleutian Islands Area. A combined TAC for all sectors is available each year in the federal Aleutian Islands subarea and when the combined TAC is reached the subarea closes to directed Pacific cod non-CDQ fishing for the rest of the year.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal could result in additional direct cost for a private person to participate in this fishery. Nonpot gear vessels with historical participation would be

required purchase groundfish pots and convert vessel equipment accordingly to maintain access to this fishery. New groundfish pots generally start at \$1,000 per pot. All vessels would additionally be required to purchase of 60 buoy tags at \$1.50 a tag to enforce the gear limit.

Table 1-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery number of vessels by gear type, 2006 – 2018.

Year	Longline	Jig	Pot	Trawl	Total
2006 ^a	8	0	3	20	31
2007 ^a	7	1	12	20	40
2008 ^a	9	5	14	22	50
2009 ^a	6	2	3	16	27
2010 ^a	1	0	6	13	20
2011 ^a	3	0	2	2	7
2012 ^a	6	3	6	14	29
2013 ^a	1	0	7	5	13
2014 ^a	0	0	4	4	8
2015 ^a	0	0	0	2	2
2016	0	0	0	6	6
2017	0	0	3	0	3
2018	0	0	8	6	14

Source: ADF&G fish ticket database.

^aVessel number is total for both A and B seasons.

Table 1-2.—Aleutian Islands District state-waters Pacific cod fishery harvest in whole pounds by gear type, 2006–2018.

Year	Season	Longline	Trawl	Pot	Jig	Total
2006	A season	CF	7,053,035	CF	0	8,502,781
	B season	76,462	0	274,952	0	351,414
2007	A season	0	6,998,224	1,231,707	0	8,229,931
	B season	CF	0	2,383,163	CF	3,409,070
2008	A season	CF	6,130,304	CF	0	7,477,507
	B season	362,410	0	3,786,710	92,572	4,241,692
2009	A season	CF	1,295,595	3,879,737	CF	5,537,886
	B season	CF	0	0	CF	CF
2010	A season	0	4,899,783	3,059,731	0	7,959,514
	B season	CF	0	CF	0	826,171
2011	A season	0	CF	CF	0	CF
	B season	CF	0	CF	0	CF
2012	A season	CF	5,983,213	CF	0	11,462,339
	B season	274,856	0	555,369	48,462	878,687
2013	A season	0	CF	CF	0	CF
	B season	CF	0	0	0	CF
2014	A season	0	CF	CF	0	CF
	B season	0	0	0	0	0
2015	A season	0	CF	0	0	CF
	B season	0	0	0	0	0
2016		0	CF	0	0	CF
2017		0	0	CF	0	CF
2018		0	CF	CF	0	CF

Note: CF = confidential.

Table 1-3.—Number of vessels by gear type and vessel size in the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2006–2018.

Year	Longline		Jig		Pot		Trawl		Total vessels
	<59 ft	>58 ft	<61 ft	61–125 ft	<61 ft	6–125 ft	<61 ft	61–100 ft	
2006 ^a	3	5	0	0	0	3	3	17	31
2007	0	0	0	0	1	11	7	13	32
2008 ^b	7	2	5	0	3	11	5	17	50
2009	6	0	2	0	0	3	6	10	27
2010 ^c	0	1	0	0	0	6	4	9	20
2011	2	1	0	0	0	2	0	2	7
2012 ^c	6	0	3	0	6	0	7	9	31
2013	1	0	0	0	7	0	1	4	13
2014	0	0	0	0	4	0	2	2	8
2015	0	0	0	0	0	0	0	2	2
2016	0	0	0	0	0	0	0	6	6
2017	0	0	0	0	3	0	0	0	3
2018 ^c	0	0	0	0	6	2	5	1	14

^a No vessel size restrictions. Vessels up to 175 feet OAL using longline gear and 300 feet OAL using trawl gear participated in 2006.

^b Two vessels switched gear types during the season.

^c One vessel switched gear types during the season.

Table 1-4.—Number of trips, percent of harvest, and average CPUE by gear type in the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

Gear type	Number of trips	Percent of harvest	Average CPUE
Pot	100	84	318
Trawl	19	16	10,016

Source: ADF&G fish ticket database.

Note: Average CPUE for pot gear is round pounds per pot and round pounds per tow for trawl gear.

Table 1-5.—Average number of pots registered per vessel, by year and vessel size in the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2013–2018.

Year	<60 feet	>60 feet	Overall Average
2013	105	-	105
2014	116	-	116
2015 ^a	-	-	-
2016 ^a	-	-	-
2017	62	-	62
2018	63	200	102

Source: ADF&G AIS state-waters Pacific cod registration forms.

Note: Data not available for years prior to 2013.

^a No pot vessels registered to fish in 2015 and 2016.

Table 1-6.—Percent of total harvest caught by number of pots registered per vessel in the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

Number of Pots	Percent of Harvest
60 and under	7
61 to 75	55
76+	7

Source: ADF&G fish ticket database.

Table 1-7.—Average CPUE for the entire season by number of pots registered to fish in the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

Number of Pots	Average CPUE
60 and under	261
61+	311

Source: ADF&G fish ticket database.

Table 1-8.—Number of pot vessels that registered for both the Aleutian Islands Subdistrict and Dutch Harbor Subdistrict state-waters Pacific cod fisheries, 2014–2018.

Year	No. Vessels Registered for AIS and DHS
2014	1
2015 ^a	0
2016 ^a	0
2017	2
2018	1

Source: ADF&G fish ticket database.

Note: The DHS state-waters Pacific cod fishery was not created until 2014.

^a No pot vessels registered to fish in the AIS fishery in 2015 and 2016.

PROPOSAL 2 - 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Ron Kavanaugh.

WHAT WOULD THE PROPOSAL DO? Eliminate the 15-million-pound maximum Pacific cod GHL limit in the AIS Pacific cod state-waters fishery.

WHAT ARE THE CURRENT REGULATIONS? The AIS state-waters Pacific cod GHL is initially set at 27% of the federal Aleutian Islands Subarea Pacific cod ABC. If the GHL is achieved during a calendar year, the GHL increases by an additional 4% of the ABC to 31% of the federal ABC. The GHL increases by an additional 4% of the federal ABC, following each year the GHL is achieved up to a maximum of 39% of the ABC. However, the GHL is capped at 15 million pounds irrespective of the established allocation should the derived GHL exceed 15 million pounds.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Allow the GHL be fully available at the designated level as defined in the AIS management plan when the prescribed GHL exceeds 15 million pounds. During some years this would allow for added harvest opportunity for participants. Conversely, during years without adequate processing capacity to fully prosecute the fishery this proposal could result reduced utilization of available Pacific cod harvestable surplus.

BACKGROUND: The AIS state-waters Pacific cod fishery was established in 2006 in response to an emergency petition submitted on behalf of the community of Adak (Figure 2-1). From 2006 through 2014, GHLS were set at 3% of the combined federal Bering Sea and Aleutian Islands Area Pacific cod ABC. In 2014, the NPFMC adopted separate Pacific cod ABCs in the Bering Sea and Aleutian Islands subareas in response to genetic differences across the 2 stocks and address concerns about declining Aleutian Islands Pacific cod abundance. In 2015, the board adopted separate GHL allocations for the AIS and DHS to coordinate with the federal action to ensure the AIS and DHS state-waters GHLS are based on the appropriate federal subarea ABCs.

Reduced Pacific cod abundance in the Bering Sea and Gulf of Alaska combined with an operational processing facility in Adak recently renewed interest in the AIS state-waters Pacific cod fishery. Increased participation in this fishery will increase the likelihood of achieving annual GHLS and allow future GHLS to increase over time. State and federal Pacific cod removals are managed to not exceed the annual Pacific cod ABC in the Aleutian Islands. Each time the state-waters GHL increases, a corresponding decrease in federal Pacific cod fishing opportunity is necessary to prevent exceeding the Aleutian Islands Subarea Pacific cod ABC.

Since its inception, the AIS fishery has been generally underutilized, with the GHL being fully achieved only during 3 of the past 13 years (2007, 2008, and 2018; Table 2-1). During years when the GHL was not achieved, approximately 50% of the GHL remained unharvested. Years when the GHL was fully harvested correspond to periods when a shore-based processor was operational in Adak. Currently, there is no mechanism to reallocate unharvested GHL inseason to the adjacent federal fishery whose participants typically have greater harvest capability than state-waters fishery participants. As a result, ABC is foregone during years when vessel or processor availability is inadequate to fully prosecute the state-waters fishery.

In response to sporadic shore-based processor availability and the corresponding pattern of foregone state-waters harvest, the board established a 15 million-pound maximum GHL cap in 2015 to buffer against over-encumbering ABC. At that time, the GHL hadn't been achieved since 2008 (Table 2-1). The 15-million-pound cap has not restricted the calculated GHL to date. However, the 2018 GHL was based on the minimum regulatory allocation rate of 27% of the Aleutian Islands ABC and totaled 12.8 million pounds. The 2018 GHL was attained allowing the 2019 GHL basis to increase to 31% of the ABC. Should Pacific cod abundance remain comparable or increase during 2019, the calculated GHL will likely exceed 15 million pounds and state-waters fishery harvest could be restricted by the current regulation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 2-1.—Aleutian Islands District state-waters Pacific cod fishery harvest, effort, and value, 2006–2018.

Year	Season	GHL ^a	Harvest ^a	GHL Achieved	Vessels	Landings	Average price per pound ^b	Fishery value ^c
2006	A season	8,981,540	8,502,781		26	68	\$0.23	\$1.30
	B season	3,849,232 ^d	352,821		5	19	\$0.38	\$1.40
	TOTAL	12,830,772	8,855,602	N	30 ^e	87	\$0.31	\$2.70
2007	A season	8,148,202	8,229,931		27	97	\$0.45	\$3.60
	B season	3,492,086 ^f	3,409,070		12	106	\$0.52	\$1.70
	TOTAL	11,640,288	11,639,001	Y	39 ^e	203	\$0.49	\$5.30
2008	A season	8,148,202	7,477,507		30	116	\$0.63	\$4.50
	B season	3,492,086 ^g	4,241,692		18	77	\$0.57	\$1.80
	TOTAL	11,640,288	11,719,199	Y	45 ^e	193	\$0.61	\$6.30
2009	A season	8,425,981	5,537,886		22	50	NA	NA
	B season	3,611,135 ^g	CF		5	47	CF	CF
	TOTAL	12,037,116	CF	N	27	97	CF	CF
2010	A season	8,055,608	7,959,514		16	84	\$0.25	\$1.60
	B season	3,452,404 ^g	826,170		3	4	\$0.32	\$1.10
	TOTAL	11,508,012	8,785,685	N	16 ^e	88	\$0.29	\$2.70
2011	A season	10,879,701	CF		3	4	CF	CF
	B season	4,662,729 ^g	CF		4	16	CF	CF
	TOTAL	15,542,430	595,289	N	6 ^e	20	CF	CF
2012	A season	14,537,132	11,462,339		21	201	\$0.31	\$3.60
	B season	6,230,200 ^g	953,312		7	25	CF	CF
	TOTAL	20,767,332	12,341,027	N	26 ^e	226	CF	CF
2013	A season	14,213,056	CF		12	CF	CF	CF
	B season	6,091,310 ^g	CF		1	CF	CF	CF
	TOTAL	20,304,366	10,563,646	N	13	151	CF	CF
2014	A season	12,504,712	CF		8	133	CF	CF
	B season	5,359,162 ^g	0		0	0	\$0.00	\$0.00
	TOTAL	17,863,874	CF	N	8	133	CF	CF
2015	A season	12,620,583	CF		2	CF	CF	CF
	B season	5,408,821 ^g	0		0	0	\$0.00	\$0.00
	TOTAL	18,029,404	CF	N	2	CF	CF	CF
2016		10,476,259 ^h	CF	N	6	39	CF	CF
2017		12,797,703	CF	N	3	84	CF	CF
2018		12,798,000	CF	Y	14	132	CF	CF

Note: CF = Confidential

^a In whole fish pounds.

^b Price per pound of landed weight.

^c Fishery value based on landed weight, in millions of dollars.

^d ADF&G made 3.5 million pounds of the GHL available to National Marine Fisheries Service effective on September 1.

^e Some vessels participated in both seasons.

^f Overage from the A season was deducted from the B season GHL. Initial GHL shown.

^g A season GHL was not fully harvested, remaining A season GHL rolled over into B season GHL; initial GHL shown.

^h Regulation changed to only one season for AIS state-waters Pacific cod.

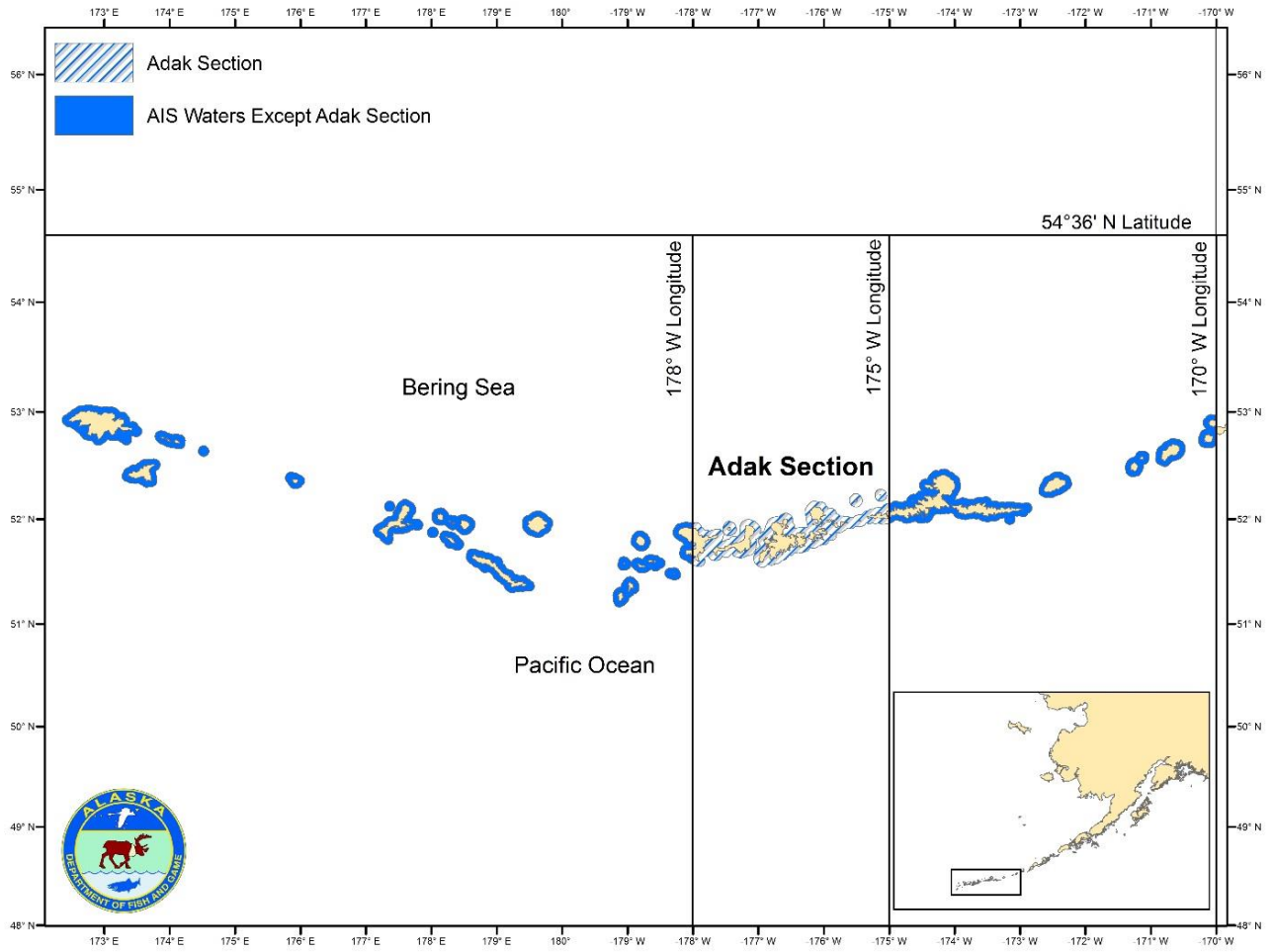


Figure 2-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery map.

PROPOSAL 3 - 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Adjust the annual AIS Pacific cod state-waters GHL apportionment based on processor availability in the City of Adak or Atka. During years without adequate processing capacity in the AIS, the GHL would be established at 13.5% of the Aleutian Islands subarea Pacific cod ABC. During years when one or more operational shore-based processors are available, the AIS GHL would be established as currently prescribed in regulation beginning at 27% of the Aleutian Islands subarea Pacific cod ABC.

WHAT ARE THE CURRENT REGULATIONS? The AIS state-waters Pacific cod GHL is initially set at 27% of the federal Aleutian Islands subarea Pacific cod ABC. If the GHL is achieved during a calendar year, the GHL increases by 4% of the federal ABC to 31% of the federal ABC. The GHL increases by an additional 4% of the federal ABC following each year the GHL is achieved up to a maximum of 39% of the ABC. However, the GHL is capped at 15 million pounds irrespective of the allocation rate should the derived GHL total more than 15 million pounds.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? During years when processing capacity is inadequate to prosecute the full AIS state-waters GHL this proposal would reduce the likelihood of over-allocating Pacific cod ABC to the state-waters fishery that would otherwise be available to federal Pacific cod users. During years when processing capacity is available to fully prosecute the fishery, this proposal would allow the full regulatory GHL to be allocated to the state-waters fishery.

BACKGROUND: The AIS state-waters Pacific cod fishery was established in 2006 in response to an emergency petition submitted on behalf of the community of Adak (Figure 3-1). From 2006 through 2014, GHLs were set at 3% of the combined federal Bering Sea and Aleutian Islands Area ABC. In 2014, the NPFMC adopted separate Pacific cod ABCs in the Bering Sea and Aleutian Islands subareas in response to genetic differences across the 2 Pacific cod stocks and address concerns about declining Aleutian Islands Pacific cod abundance. In 2015, the board adopted separate GHL allocations for the AIS and DHS to coordinate with the federal action to ensure the DHS and AIS state-waters GHLs are based on the appropriate federal sub area ABCs.

Declines in Pacific cod abundance in the Bering Sea and Gulf of Alaska combined with an operational processor in Adak recently renewed interest in the AIS state-waters Pacific cod fishery. Increasing participation in this fishery will increase the likelihood of achieving annual GHLs and allow future GHLs to increase over time. State and federal Pacific cod removals are managed to not exceed the annual Pacific cod ABC in the Aleutian Islands. Each time the state-waters GHL increases, a corresponding decrease in federal Pacific cod fishing opportunity is necessary to prevent exceeding the Aleutian Islands Subarea Pacific cod ABC.

Since its inception, the AIS fishery has been generally underutilized, with the GHL being fully achieved only during 3 of the past 13 years (2007, 2008, and 2018; Table 3-1). During years when the GHL was not achieved, approximately 50% of the GHL remained unharvested. Years

when the GHL was fully harvested correspond to periods when a shore-based processor was operational in Adak. Currently, there is no mechanism to reallocate unharvested GHL inseason to the adjacent federal fishery whose participants typically have higher harvest capability. As a result, ABC is foregone during years when vessel or processor availability is inadequate to fully prosecute the state-waters fishery.

In response to sporadic shore-based processor availability and the corresponding pattern of foregone state-waters harvest, the board established a 15 million-pound maximum GHL cap in 2015 to buffer against over-encumbering ABC. At that time, the GHL hadn't been achieved since 2008 (Table 3-1). The 15-million-pound cap has not restricted the calculated GHL to date. However, the 2018 GHL was based on the minimum regulatory allocation rate of 27% of the Aleutian Islands ABC and totaled 12.8 million pounds. The 2018 GHL was attained allowing the 2019 GHL basis to increase to 31% of the ABC. Should Pacific cod abundance remain comparable or increase during 2019, the calculated GHL will likely exceed 15 million pounds and state-waters fishery harvest could be restricted by current regulation.

To improve utilization of federal Pacific cod TAC in the Aleutian Islands, the NPFMC established a 5,000 mt Pacific cod set-aside in 2015 ear-marked for catcher-vessels delivering to shore-based processors west of 170° W long. The federal set-aside is contingent on availability of a shore-based processor in the City of Adak or Atka. In part, to qualify for the federal set-aside, either municipality must formally notify NMFS with an intent to process Pacific cod at a shore-based processor prior to November 1 the preceding year. This proposal uses the same processor notification as the basis to determine whether a GHL adjustment is warranted. An intent to process Pacific cod at a shore-based processor has been submitted to NMFS for the 2019 season.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 3-1.—Aleutian Islands Subdistrict state-waters Pacific cod harvest, effort, proportion of GHL processed, and processor participation, 2006–2018.

Year	Initial GHL ^a	Harvest ^a	GHL Achieved	Vessels	Landings	Floating Processor(s)		Shore-based Processor(s)		
						Number	Proportion GHL Processed	Number	Adak Proportion GHL Processed	Dutch Harbor, Akutan Proportion GHL Processed
2006	12,830,772 ^b	8,855,602	N	30 ^c	87	8	52%	3	15%	<5%
2007	11,640,288 ^d	11,639,001	Y	39 ^c	203	7	45%	3	55%	<5%
2008	11,640,288 ^e	11,719,199	Y	45 ^c	193	13	76%	3	24%	<5%
2009	12,037,116 ^e	CF	N	27	97	6	<50%	1	<25%	-
2010	11,508,012 ^e	8,785,685	N	16 ^c	88	8	72%	2	<5%	<5%
2011	15,542,430 ^e	CF	N	6 ^c	20	3	<5%	1	-	<5%
2012	20,767,332 ^e	12,341,027	N	26 ^c	226	3	13%	2	<50%	-
2013	20,304,366 ^e	CF	N	13	151	-	-	3	<75%	-
2014	17,863,874 ^e	CF	N	8	133	1	<5%	-	-	-
2015	18,029,404 ^e	CF	N	2	8	1	<5%	-	-	-
2016	10,476,259 ^f	CF	N	6	39	2	<25%	-	-	-
2017	12,797,703	CF	N	3	84	1	<50%	1	<5%	-
2018	12,798,000	CF	Y	14	132	1	<5%	1	<75%	-

Note: CF = Confidential

^a In whole fish pounds.

^b ADF&G made 3.5 million pounds of the GHL available to National Marine Fisheries Service effective on September 1.

^c Some vessels participated in both seasons.

^d Overage from the A season was deducted from the B season GHL. Initial GHL shown.

^e A season GHL was not fully harvested, remaining A season GHL rolled over into B season GHL; initial GHL shown.

^f Regulation changed to only one season for AIS state-waters Pacific cod.

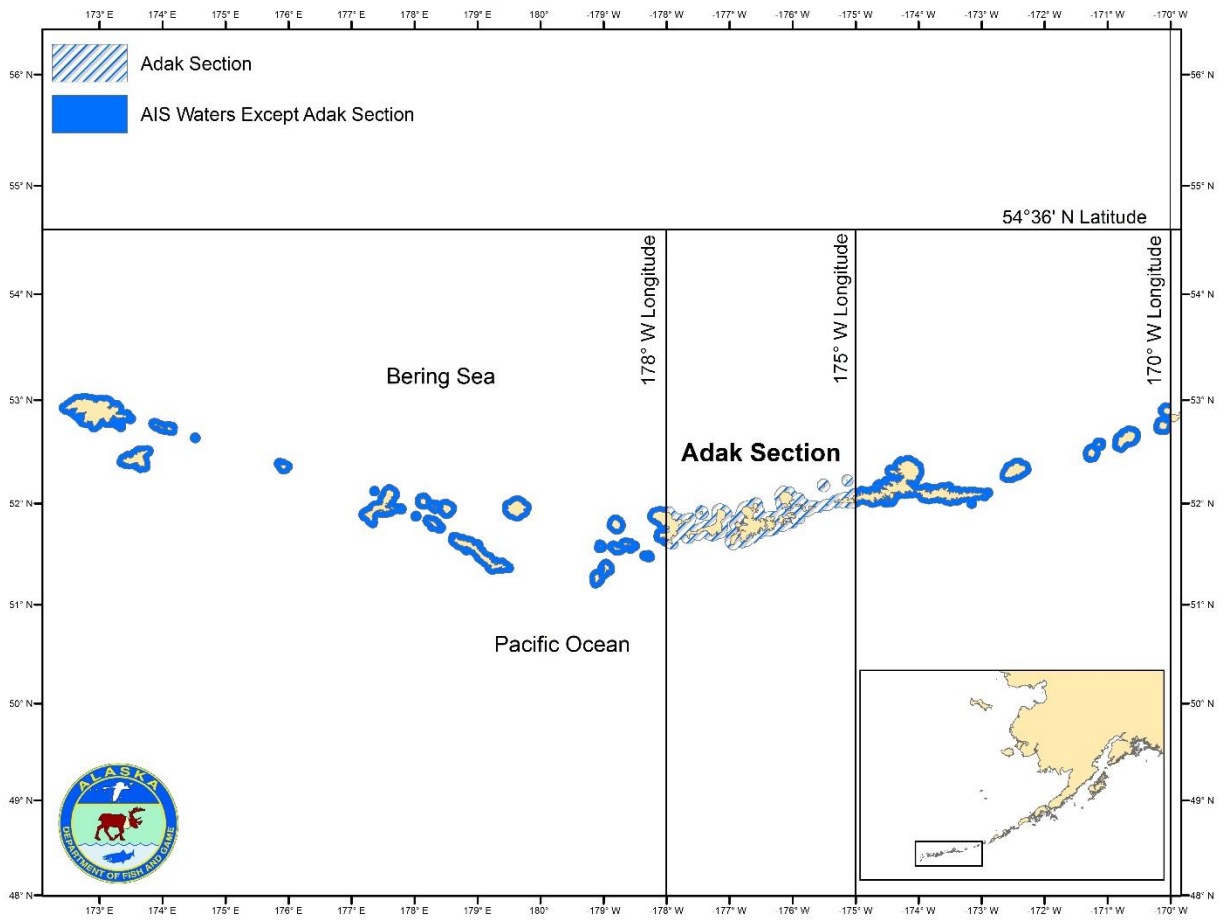


Figure 3-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery map.

PROPOSAL 4 - 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Aleutian Pribilof Island Community Development Association.

WHAT WOULD THE PROPOSAL DO? Reduce AIS state-waters Pacific cod GHL apportionment if the GHL is not fully achieved in the previous year. If the AIS Pacific cod GHL is less than 85% harvested during a given year, the following year the GHL would be reduced by 4% of the federal Aleutian Islands Subarea Pacific cod ABC. For every year harvest totals less than 85% of the established GHL, the GHL would be reduced by an additional 4%, of the federal ABC to a minimum GHL of 11% of the federal Aleutian Islands Subarea Pacific cod ABC.

WHAT ARE THE CURRENT REGULATIONS? The AIS state-waters Pacific cod GHL is initially set at 27% of the federal Aleutian Islands Subarea Pacific cod ABC. If the GHL is achieved during a calendar year, the GHL increases by 4% to 31% of the federal ABC. The GHL increases by an additional 4%, following each year that the GHL is achieved up to a maximum of 39% of the ABC. However, the GHL is capped at 15 million pounds irrespective of the allocation rate should the derived GHL total more than 15 million pounds.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? During years when catcher vessel or processing capacity is inadequate to fully prosecute the AIS state-waters fishery, this proposal would lower the GHL and reduce the likelihood of over-allocating Pacific ABC to the state-waters fishery that would otherwise be available to federal Pacific cod users. During years when processing capacity is available to fully prosecute the fishery, this proposal would allow the full regulatory GHL to be allocated to the state-waters fishery.

Current regulation defines that a GHL has been achieved when at least 90% of the GHL has been harvested. This proposal uses a harvest benchmark of less than 85% to trigger a GHL reduction. The department interprets that during years when harvest totals between 85% and 89% of the current year's GHL, the following year's GHL allocation basis would remain unchanged as harvest at this range would not satisfy the existing step-up or proposed step-down requirements to modify the GHL.

BACKGROUND: The AIS state-waters Pacific cod fishery was established in 2006 in response to an emergency petition submitted on behalf of the community of Adak (Figure 4-1). From 2006 through 2014, GHLs were set at 3% of the combined federal Bering Sea and Aleutian Islands Area ABC. In 2014, the NPFMC adopted separate Pacific cod ABCs in the Bering Sea and Aleutian Islands subareas in response to genetic differences across the 2 Pacific cod stocks and address concerns about declining Aleutian Islands Pacific cod abundance. In 2015, the board adopted separate GHL allocations for the AIS and DHS to coordinate with the federal action to ensure the DHS and AIS state-waters GHLs are based on the appropriate federal sub area ABCs.

Declines in Pacific cod abundance in the Bering Sea and Gulf of Alaska combined with an operational processor in Adak recently renewed interest in the AIS state-waters Pacific cod fishery. Increasing participation in this fishery will increase the likelihood of achieving annual GHLs and allow future GHLs to increase over time. State and federal Pacific cod removals are managed to not exceed the annual Pacific cod ABC in the Aleutian Islands. If the state-waters

GHL increases, a corresponding decrease in federal Pacific cod fishing opportunity is necessary to prevent exceeding the Aleutian Islands Subarea Pacific cod ABC.

Since inception, the AIS fishery has been generally underutilized, with the GHL being fully achieved only during 3 of the past 13 years (2007, 2008, and 2018; Table 4-1). During years when the GHL was not achieved, approximately 50% of the GHL remained unharvested. Years when the GHL was fully harvested correspond to periods when a shore-based processor was operational in Adak. Currently, there is no mechanism to reallocate unharvested GHL inseason to the adjacent federal fishery whose participants typically have higher harvest capability. As a result, ABC is foregone during years when vessel or processor availability is inadequate to fully prosecute the state-waters fishery.

In response to sporadic shore-based processor availability and the corresponding pattern of foregone state-waters harvest, the board established a 15 million-pound maximum GHL cap in 2015 to buffer against over-encumbering ABC. At that time, the GHL hadn't been achieved since 2008 (Table 4-1). The 15-million-pound cap has not restricted the calculated GHL to date. However, the 2018 GHL was based on the minimum regulatory allocation rate of 27% of the Aleutian Islands ABC and totaled 12.8 million pounds. The 2018 GHL was attained allowing the 2019 GHL basis to increase to 31% of the ABC. Should Pacific cod abundance remain comparable or increase during 2019, the calculated GHL will likely exceed 15 million pounds and state-waters fishery harvest could be restricted by current regulation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal but recommends the same harvest benchmark (85% or 90%) be used to trigger increasing or decreasing the GHL.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 4-1.—Aleutian Islands District state-waters Pacific cod fishery harvest, effort, and value, 2006–2018.

Year	Season	Initial GHLa	Harvesta	GHL Achieved	Percent GHL Harvested	Vessels	Landings
2006	A season	8,981,540	8,502,781			26	68
	B season	3,849,232 ^b	352,821			5	19
	TOTAL	12,830,772	8,855,602	N	69%	30 ^c	87
2007	A season	8,148,202	8,229,931			27	97
	B season	3,492,086 ^d	3,409,070			12	106
	TOTAL	11,640,288	11,639,001	Y	100%	39 ^c	203
2008	A season	8,148,202	7,477,507			30	116
	B season	3,492,086 ^e	4,241,692			18	77
	TOTAL	11,640,288	11,719,199	Y	101%	45 ^c	193
2009	A season	8,425,981	5,537,886			22	50
	B season	3,611,135 ^e	CF			5	47
	TOTAL	12,037,116	CF	N	CF	27	97
2010	A season	8,055,608	7,959,514			16	84
	B season	3,452,404 ^e	826,170			3	4
	TOTAL	11,508,012	8,785,685	N	76%	16 ^c	88
2011	A season	10,879,701	CF			3	4
	B season	4,662,729 ^e	CF			4	16
	TOTAL	15,542,430	595,289	N	4%	6 ^c	20
2012	A season	14,537,132	11,462,339			21	201
	B season	6,230,200 ^e	953,312			7	25
	TOTAL	20,767,332	12,341,027	N	59%	26 ^e	226
2013	A season	14,213,056	CF			12	CF
	B season	6,091,310 ^e	CF			1	CF
	TOTAL	20,304,366	10,563,646	N	52%	13	151
2014	A season	12,504,712	CF			8	133
	B season	5,359,162 ^e	0			0	0
	TOTAL	17,863,874	CF	N	CF	8	133
2015	A season	12,620,583	CF			2	CF
	B season	5,408,821 ^e	0			0	0
	TOTAL	18,029,404	CF	N	CF	2	CF
2016		10,476,259 ^f	CF	N	CF	6	39
2017		12,797,703	CF	N	CF	3	84
2018		12,798,000	CF	Y	CF	14	132

Note: CF = Confidential

^a In whole fish pounds.

^b ADF&G made 3.5 million pounds of the GHL available to National Marine Fisheries Service effective on September 1.

^c Some vessels participated in both seasons.

^d Overage from the A season was deducted from the B season GHL. Initial GHL shown.

^e A season GHL was not fully harvested, remaining A season GHL rolled over into B season GHL; initial GHL shown.

^f Regulation changed to only one season for AIS state-waters Pacific cod.

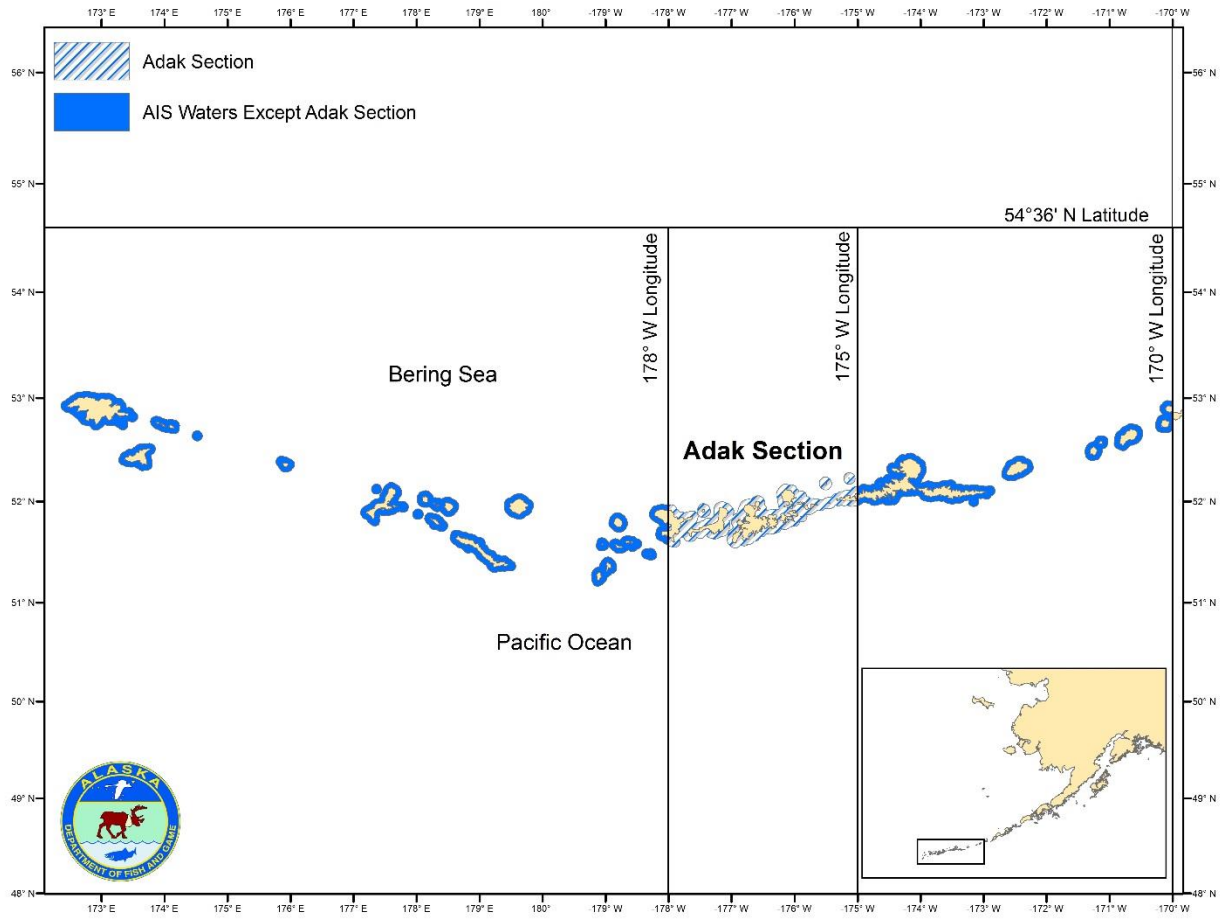


Figure 4-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery map.

PROPOSAL 5 – 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Adak Community Development Corporation and City of Adak.

WHAT WOULD THE PROPOSAL DO? Temporarily increase the 2020 AIS Pacific cod GHL based on the amount of federal Aleutian Islands Catcher Vessel Harvest Set-Aside quota (up to 5,000 metric tons annually) that is not available for harvest and delivery to shore-based processors in the Aleutian Islands (Adak or Atka) due to Pacific cod harvest by vessels participating in the federal unrestricted trawl fishery during the 2019 season. The reallocated quota from the federal fishery would be additive to the GHL set according to AIS state-waters management plan and would not count towards the 15-million-pound GHL cap.

WHAT ARE THE CURRENT REGULATIONS? The federal Aleutian Islands Catcher Vessel Harvest Set-Aside is not currently recognized in state regulation. The GHL for the AIS state-waters Pacific cod fishery is not allocated to any one gear type or vessel size class nor are there any regulations that require Pacific cod be delivered to a specified processing sector (shore-based, floating, mothership, or catcher processor).

The GHL for state-waters Pacific cod in the AIS is initially set at 27% of the federal estimated ABC for Pacific cod in the Aleutian Islands subarea. If the GHL is achieved during a calendar year, the GHL increases by 4% of the federal ABC to 31% of the federal ABC. The GHL increases by 4% of the federal ABC, following each year that the GHL is achieved to a maximum of 39% of the ABC. However, the GHL is capped at 15 million pounds irrespective of the allocation rate should the derived GHL total more than 15 million pounds.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This could, under certain circumstances, increase the allocation of Pacific cod for the Aleutian Islands Subdistrict Pacific cod fishery by as much as 5,000 metric tons (11 million pounds) for the 2020 AIS state-waters season. This additional allocation would be deducted from the overall Bering Sea-Aleutian Islands federal ABC and the federal TAC would be reduced accordingly. This action would reduce the overall amount of federal fishing in the Aleutian Islands as it would encumber up to an additional 11 million pounds of Aleutian Islands ABC exclusively for the state-waters fishery.

BACKGROUND: Pacific cod in the Aleutian Islands has been underutilized during state and federal waters for much of the fishery's recent history. In 2015, the NPFMC recommended a 5,000 mt set-aside ear-marked for catcher-vessels delivering to shore-based processors in the Aleutian Islands west of 170° W long. In order to maximize utility of the action, the NPFMC additionally recommended the following provisions apply: any Aleutian Islands directed TAC, above the set-aside, would be available to any open sector and not subject to any delivery requirements (this is known as the unrestricted quota), the set-aside is contingent on the availability of one or more shore-based processors in the City of Adak or the City of Atka and conditional on a shore-based processors ability to process 1,000 mt of federal Pacific cod by February 28. To qualify for the set-aside the City or Adak or Atka must notify NMFS of their intent to process Pacific cod for the following season before November 1 the preceding year.

This action, Amendment 113, was adopted in July of 2016 and was effective during the 2017 and 2018 fisheries.

The 2018 fishery was the first instance where the federal set-aside guided by Amendment 113 was enacted (Figure 5-1). To meet the February 28 requirement of processing 1,000 mt of federal TAC and receive the remaining 4,000 mt set-aside, the processor declined to process trawl caught state-waters Pacific cod from the Aleutian Islands Subdistrict state-waters fishery until after February 28; an action which prolonged the state-waters fishery. The processor's decision was prompted by federal trawl catcher vessels fishing the unrestricted Pacific cod quota, in which trawl vessels are able to harvest Aleutian Islands Pacific cod and deliver to any shore-based or floating processor. The unrestricted harvest can prevent shore-based processors from achieving the Amendment 113 requirements and preempt the set-aside. Although the federal set-aside was ultimately enacted in 2018, the entire 5,000 metric ton set-aside was not fully available to local processors in the Aleutians due to unrestricted trawl harvest.

If this proposal is adopted and the Aleutian Islands Pacific cod ABC is low in 2020, it is possible the state-waters fishery could be allocated an amount that exceeds the total federal Aleutian Island Pacific cod ABC and possibly the OFL. If the state GHL meets or exceeds the Aleutian Islands ABC, the federal Aleutian Islands set-aside for that year would be set to zero.

Should the board adopt this proposal the department recommends including language that sunsets the regulation on December 31, 2020 per the proposal intent.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal and recommends the proposal authors engage the NPFMC to address the objectives of federal Amendment 113. As written, this proposal may not achieve the intended outcome. State regulation would not require any additional GHL allocated to the state-waters fishery be delivered to an AI shoreside processor. Currently state-waters Pacific cod can be delivered to any processing sector, including ports outside of the AI, catcher processors, and floating processors.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

TABLE 9a—FINAL 2018 BSAI A-SEASON PACIFIC COD LIMITS ALEUTIAN ISLANDS FOR SHOREPLANTS INTENTION TO PROCESS PACIFIC COD ¹

2018 allocations under Aleutian Islands CV Harvest Set-Aside	Amount (mt)
AI non-CDQ TAC	14,016
AI ICA	2,500
AI DFA	11,516
BS non-CDQ TAC	168,005
BSAI Trawl CV A-Season Allocation	29,768
BSAI Trawl CV A-Season Allocation minus Sector Limitation ²	24,768
BS Trawl CV A-Season Sector Limitation	5,000
AI CV Harvest Set-Aside	5,000
AI Unrestricted Fishery	6,516

¹ These allocations will apply in 2018 because NMFS received notice of intent to process AI Pacific cod by October 31 of the previous year, pursuant to § 679.20(a)(7)(viii), and the performance requirements set forth in § 679.20(a)(7)(viii) are likewise met. Prior to October 31, 2017, NMFS received timely notice from the City of Adak indicating intent to process AI Pacific cod for the 2018 season. Accordingly, the harvest limits in Table 9a will be in effect in 2018, subject to the performance requirements outlined in § 679.20(a)(7)(viii).

² This is the amount of the BSAI trawl CV A season allocation that may be harvested in the Bering Sea prior to March 21, 2018, unless modified because the performance requirements were not met.

Figure 5-1.—Final 2018 federal Bering Sea-Aleutian Islands Pacific cod harvest specifications, including the 5,000 mt Aleutian Islands set-aside.

PROPOSAL 6 – 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Under Sixty Cod Harvesters.

WHAT WOULD THE PROPOSAL DO? Establish a maximum vessel size limit of 60 feet OAL for all vessels participating in the AIS state-waters Pacific cod fishery. This would additionally establish a GHl rollover provision allowing vessels greater than 60 feet OAL to participate in the fishery if the under 60 feet OAL fleet is unable to harvest the GHl by an unspecified date.

The proposal does not specify if vessels over 60 feet could fish inside state-waters under parallel rules while the state-waters fishery is open.

WHAT ARE THE CURRENT REGULATIONS? When the Adak Section (state waters between 175°W long and 178°W long) is open, vessel size is limited to 60 feet or less for trawl, jig, and pot vessels and 58 feet or less for longline vessels. When all waters of the AIS are open, vessel size is limited to 125 feet or less for pot vessels, 100 feet or less for trawl vessels, and 58 feet or less for longline and jig vessels.

There are no established harvest allocations by gear type or vessel size, however, all vessels are limited to delivering no more than 150,000 pounds whole weight of Pacific cod per trip.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Vessels greater than 60 feet in length would be excluded from the AIS state-waters Pacific cod fishery unless the vessel size restriction is superseded by department emergency order. During some years, this action will yield additional harvest opportunity for vessels 60 feet or less. Vessels greater than 60 feet in length would realize a corresponding loss in harvest opportunity inside state waters during years when the federal/parallel fishery closes prior to the state-waters fishery closure. Given high variability in regulatory change over time, federal fishery overlap, processor availability, and changes in fleet composition over time, the current magnitude of these effects are largely unknown.

BACKGROUND: The AIS state-waters Pacific cod fishery opens January 1 in the Adak Section (between 175°W long to 178°W long) to vessels 60 feet or less OAL using trawl, pot, jig, and vessels 58 feet or less in length using longline gear. All remaining waters of the AIS open for pot vessels 125 feet or less, trawl vessels 100 feet or less, and longline and jig vessels 58 feet or less, either 4 days after the Bering Sea and Aleutian Islands parallel “A” season for the catcher-vessel trawl fishery is closed, 4 days after the federal Aleutian Islands Subarea non-CDQ season is closed, or March 15; whichever occurs first.

Longline, trawl, pot, and jig gear have been allowable gear types in the AIS since inception of the fishery in 2006. For the first 5 years of the fishery trawl vessels were the predominant gear type followed by pot and longline vessels (Table 6-1). Most vessels during the early years of the fishery exceeded 60 feet in length (Table 6-2). Regulations concerning vessel size have shifted since inception of the fishery to generally favor smaller sized vessels (Table 6-3). From 2013 to 2017, vessel effort shifted predominantly towards pot and trawl gear vessels and the proportion

of 60 feet and over vessels decreased. Only pot and trawl vessels registered for the 2018 AIS fishery and 3 of the 14 registered vessels exceeded 60 feet in length.

The harvest level for the state-waters fishery is currently was set at 27% of the federal BSAI Pacific cod ABC for 2018 yielding a GHL of 12,798,000 pounds. A total of 14 vessels participated in the fishery, including 8 pot vessels and 6 trawl vessels (Table 6-1); one vessel switched from pot gear to trawl gear during the season. The 2018 season was open for 81 days; harvest is confidential.

Statewide, the number of ‘Super 58’, or wide-body 58 feet OAL, pot gear vessels has steadily increased since the mid-2000s. Most other state-waters Pacific cod fisheries in Alaska restrict vessel size to a maximum of 58 feet in length and vessels in that size class regularly harvest GHLS equal to or larger than the GHLS historically established for the AIS fishery. Harvest and hold capacity of vessels less than 60 feet OAL varies widely, however, the current 150,000-pound trip limit likely reduces efficiency of the high capacity vessels and better distributes harvest opportunity across a broader range of vessel sizes.

In 2018, the Adak Section opened January 1, and all other waters of the AIS state-waters Pacific cod fishery opened at 12:00 noon AKST on March 8. The fishery closed on March 23. Three vessels exceeded 60 feet in length and could not participate in the fishery until the second triggered fishery opening on March 8. These vessels fished an average of 14 days; whereas, vessels under 60 feet in length fished on average for 41 days (Table 6-4). Vessels under 60 feet in length delivered 91% of the harvest (124 deliveries), and vessels greater than 60 feet in length delivered the remaining 9% of the total harvest (8 deliveries; Table 6-4).

Current regulations open the Adak Section (state waters between 175° W long and 178° W long) on January 1 to vessels 60 feet in length or less. This provision is specifically intended to provide exclusive harvest opportunity for smaller sized vessels fishing in waters near Adak prior to opening the remainder of the AIS to vessels over 60 feet in length. During some years, vessels less than 60 feet OAL can fish the AIS state-waters season for up to two-and-a-half months before over 60 feet OAL vessels are eligible to participate.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Should this proposal be adopted, the department recommends the board consider the utility of the Adak Section as well as triggered season opening dates if all vessels are restricted a maximum of 60 feet in length.

The department also interprets from the proposal that an alternative to a GHL rollover to vessels over 60 feet in length would be to convert unused GHL to federal TAC during the season. The NPFMC adopts annual groundfish harvest specifications each December preceding the next calendar year. Yearly state-waters GHLS and federal TACs for Pacific cod are established at this time. To ensure full utilization of the Bering Sea and Aleutian Islands Pacific cod ABC, state and federal regulations concerning allocation of Pacific cod should be coordinated by December each year. During some years, unused GHL may not be eligible for transfer to federal management when total groundfish removal are limited by the federal regulatory 2 million metric ton harvest cap.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 6-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery number of vessels by gear type, 2006–2018.

Year	Longline	Jig	Pot	Trawl	Total
2006 ^a	8	0	3	20	31
2007 ^a	7	1	12	20	40
2008 ^a	9	5	14	22	50
2009 ^a	6	2	3	16	27
2010 ^a	1	0	6	13	20
2011 ^a	3	0	2	2	7
2012 ^a	6	3	6	14	29
2013 ^a	1	0	7	5	13
2014 ^a	0	0	4	4	8
2015 ^a	0	0	0	2	2
2016	0	0	0	6	6
2017	0	0	3	0	3
2018	0	0	8	6	14

Source: ADF&G fish ticket database.

^a Vessel number is total for both A and B seasons.

Table 6-2.—Number of vessels by gear type and vessel size in the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2006–2018.

Year	Longline		Jig		Pot		Trawl		Total vessels
	<59 ft	>58 ft	<61 ft	61–125 ft	<61 ft	61–125 ft	<61 ft	61–100 ft	
2006 ^a	3	5	0	0	0	3	3	17	31
2007	0	0	0	0	1	11	7	13	32
2008 ^b	7	2	5	0	3	11	5	17	50
2009	6	0	2	0	0	3	6	10	27
2010 ^c	0	1	0	0	0	6	4	9	20
2011	2	1	0	0	0	2	0	2	7
2012 ^c	6	0	3	0	6	0	7	9	31
2013	1	0	0	0	7	0	1	4	13
2014	0	0	0	0	4	0	2	2	8
2015	0	0	0	0	0	0	0	2	2
2016	0	0	0	0	0	0	0	6	6
2017	0	0	0	0	3	0	0	0	3
2018 ^c	0	0	0	0	6	2	5	1	14

Source: ADF&G fish ticket database.

^a No vessel size restrictions. Vessels as big as 175 feet OAL using longline gear and up to 300 feet OAL using pot gear participated in 2006.

^b Two vessels switched gears during the season.

^c One vessel switched gears during the season.

Table 6-3.–Regulation changes involving vessel size and gear type for the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2006–2012.

Year of Board of Fisheries Meeting	Regulation Effective Date	Vessel Size Changes	Gear Changes
2006 (February)	2006	No limit on vessel size	Legal gear includes pots, jig, hand troll, trawl, and longline
2006 (October)	2007	Pot vessels 125 feet or less OAL, trawl vessels 100 feet or less, longline and jig 58 feet or less in OAL	Pot, jig, longline, and trawl less than 60 feet OAL receive 60% of the GHL; large trawl vessels 60 feet to 124.9 feet OAL receive 40% of the GHL.
2008	2009	Vessel size limited to 60 feet or under OAL for B season only	
2010	2010	Pot vessels 125 feet and less OAL allowed in B season after August 1 st	
2011	2012	When only the Adak section is open pot, jig, trawl, hand troll can be no more than 60 feet OAL and longline gear no more than 58 feet OAL	

Source: ADF&G Board of Fisheries meeting summaries.

Note: Only years when regulations changed are noted in the table.

Table 6-4.–Harvest, number of trips, number of vessels registered, and average number of days registered to fish by vessel size for the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

Vessel Size	Percent of Harvest	Number of Trips	Number of Vessels Registered	Average Number of Days Registered to Fish
58 feet and under OAL	91	124	10	41
Over 58 feet OAL	9	8	3	14

Source: ADF&G fish ticket database and 2018 AIS Pacific cod fishery registration form

PROPOSAL 7 – 5 AAC 28.087. Management measures in parallel groundfish fisheries for protection of Steller sea lions; and 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Omar and Christopher Allinson.

WHAT WOULD THE PROPOSAL DO? Allow trawl vessels 100 feet or less OAL with a hold capacity of less than 250,000 pounds to fish in the Adak Section (between 175° W long and 178° W long) during parallel and state-waters Pacific cod seasons.

WHAT ARE THE CURRENT REGULATIONS? The AIS state-waters Pacific cod fishery opens January 1 in the Adak Section to vessels 60 feet or less OAL using trawl, pot, jig, and vessels 58 feet or less in length using longline gear. All remaining waters of the AIS open to pot vessels 125 feet or less, trawl vessels 100 feet or less, and longline and jig vessels 58 feet or less, either 4 days after the Bering Sea and Aleutian Islands parallel A season for the catcher-vessel trawl fishery is closed, 4 days after the federal Aleutian Islands Subarea non-CDQ season is closed, or March 15; whichever occurs first.

The GHL for the state-waters fishery is initially set at 27% of the federal Bering Sea-Aleutian Islands Pacific cod ABC. All vessels are restricted to possessing delivering no more than 150,000 pounds whole weight per trip.

The parallel fishery in the Aleutian Islands opens January 1 in state waters outside of the Adak Section. When the entirety of state-waters in the Aleutian Islands Subdistrict is open, the parallel fishery for Pacific cod is closed. The parallel fishery west of 170°W long reopens after the AIS state-waters season closes. During the parallel fishery in the Adak Section vessels using trawl, pot, jig, or hand troll gear are restricted to 60 feet or less in length and vessels using longline gear are restricted to 58 feet in length or less.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Trawl vessel effort within the Adak Section during state-waters and parallel fisheries would increase during years when trawl vessels 100 feet or less OAL elected to participate in the fishery. Eligible trawl vessels would gain advantage through reduced travel time between fishing grounds and processors operating in or near Adak. Nearly all pot gear effort occurs within the Adak Section. Higher trawl participation could result in increased gear interactions among users.

The Adak Section has been closed to trawl vessels over 60 feet in length since 2012 and effort overall by larger sized trawl vessels has decreased since inception of the fishery. It is unknown if, and to what degree, this proposal would encourage over 60-foot trawl effort in the Adak Section. Given the limited number of processors in the region access to a reliable market also likely constrains participation.

Given a 150,000 trip limit is currently established in regulation, the effect of further limiting vessel hold capacity to 250,000 pounds is unknown.

BACKGROUND: The AIS state-waters Pacific cod fishery was established in 2006 (Figure 7-1). After inception of the fishery, state-waters regulations predominantly mirrored the adjacent federal fishery regulations to maximize opportunity that participated in both fisheries. State-

waters regulations were initially established with no restrictions on vessel length. Vessel size limits were first established prior to the 2007 season and have been frequently modified since (Table 7-1). At the January 2011 board meeting, the Adak Section (state waters between 175°W long to 178°W long) was established for vessels 60 feet or less OAL by emergency regulation and was adopted into regulation at the March 2011 meeting. Presently, the Adak Section opens on January 1 for pot, jig, hand troll, and trawl vessels 60 feet or less and longline vessel to 58 feet or less. The remainder of the AIS typically opens late-February to mid-March and is open to trawl vessels 100 feet in length or less, pot vessels 125 feet in length or less, and jig and longline vessels 58 feet or less OAL.

When the state-waters fishery is closed and a federal Pacific cod fishery is open, the state opens a parallel Pacific cod fishery which adopts most federal fishery regulation and management measures. Harvest during a parallel season is deducted from federal TAC. Federal Pacific cod seasons in the Bering Sea and Aleutian Islands subareas open and close by sector for the entire BSAI area. When the federal Aleutian Islands subarea Pacific cod ABC is reached, the Aleutian Islands subarea closes to directed Pacific cod non-CDQ fishing for the rest of the year. Federal and parallel harvest for 2018 is confidential.

The current AIS fishery management plan was adopted in 2015. For much of its history, the fishery has been underutilized, with the GHL fully achieved in only 3 of the past 13 years (2007, 2008, and 2018; Table 7-2). The GHL for the 2018 season was 12,798,000 pounds. A total of 13 vessels participated in the 2018 fishery including 5 pot vessels 60 feet or less, 2 pot vessels over 60 feet in length, 5 trawl vessels 60 feet or less, and 1 trawl vessel over 60 feet in length (Table 7-3). One vessel switched from pot gear to trawl gear during the season. The 2018 season was open for 81 days. Harvest is confidential.

The regulatory harvest and delivery limit of 150,000 pounds per vessel generally restricts effort and harvest for most vessels regardless of gear type. Gear specific harvest information has been confidential since 2013. On average, harvest rates for over 60 feet OAL trawl and pot vessel are similar to each other as are harvest rates among pot and trawl vessel in the less than 60 feet OAL size category. Average daily harvest by vessels 60 feet in length or less exceeded daily harvest by vessels over 60 feet OAL.

In 2009, the NPFMC in conjunction with NOAA Office of Law Enforcement explored options to use vessel hold capacity as a means of limiting entry for high capacity 58 feet OAL vessels operating in Gulf of Alaska Pacific cod fisheries. Their findings published in a June 2009 discussion paper mainly focused on limiting entry based on either gross tonnage or length to width ratios. Concern was raised that limiting length to width ratio would incentivize vessels to become deeper which could impact stability. Gross tonnage was similarly ruled out because it requires a depth measurement which could be onerous to vessel owners and enforcement as it would require a vessel survey. Based on their findings, the NPFMC took no action on the measure and no regulations have been established that limit vessel entry based on hold capacity to date. Similarly, several proposals seeking to limit entry into state-waters Pacific fisheries based on vessel width or depth have been addressed during past board cycles. The board has not adopted regulations concerning fishery access based on vessel capacity to date.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. Prior to implementation the department would require additional direction from the board regarding what measure(s) should be used to determine hold capacity.

COST ANALYSIS: Approval of this proposal could result in an additional direct cost for a private person to participate in this fishery if a vessel survey or other means are required to qualify for this fishery.

Table 7-1.—Regulation changes involving vessel size and gear type for the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2006–2012.

Year of Board of Fisheries Meeting	Regulation Effective Date	Vessel Size Changes	Gear Changes
2006 (February)	2006	No limit on vessel size	Legal gear includes pots, jig, hand troll, trawl, and longline
2006 (October)	2007	Pot vessels 125 feet or less OAL, trawl vessels 100 feet or less, longline and jig 58 feet or less OAL	Pot, jig, longline, and trawl less than 60 feet OAL receive 60% of the GHL; large trawl vessels 60 feet to 124.9 feet OAL receive 40% of the GHL
2008	2009	Vessel size limited to 60 feet or under OAL for B season only	
2010	2010	Pot vessels 125 feet and less OAL allowed in B season after August 1 st	
2011	2012	When only the Adak section is open pot, jig, trawl, hand troll can be no more than 60 feet OAL and longline gear no more than 58 feet OAL	

Source: ADF&G Board of Fisheries meeting summaries.

Note: Only years when regulations changed are noted in the table.

Table 7-2.—Aleutian Islands District state-waters Pacific cod fishery harvest, effort, and value, 2006–2018.

Year	Season	GHL ^a	Harvest ^a	GHL		Landings	Average price per pound ^b	Fishery value ^c
				Achieved	Vessels			
2006	A season	8,981,540	8,502,781		26	68	\$0.23	\$1.30
	B season	3,849,232 ^d	352,821		5	19	\$0.38	\$1.40
	TOTAL	12,830,772	8,855,602	N	30 ^e	87	\$0.31	\$2.70
2007	A season	8,148,202	8,229,931		27	97	\$0.45	\$3.60
	B season	3,492,086 ^f	3,409,070		12	106	\$0.52	\$1.70
	TOTAL	11,640,288	11,639,001	Y	39 ^e	203	\$0.49	\$5.30
2008	A season	8,148,202	7,477,507		30	116	\$0.63	\$4.50
	B season	3,492,086 ^g	4,241,692		18	77	\$0.57	\$1.80
	TOTAL	11,640,288	11,719,199	Y	45 ^e	193	\$0.61	\$6.30
2009	A season	8,425,981	5,537,886		22	50	NA	NA
	B season	3,611,135 ^g	CF		5	47	CF	CF
	TOTAL	12,037,116	CF	N	27	97	CF	CF
2010	A season	8,055,608	7,959,514		16	84	\$0.25	\$1.60
	B season	3,452,404 ^g	826,170		3	4	\$0.32	\$1.10
	TOTAL	11,508,012	8,785,685	N	16 ^e	88	\$0.29	\$2.70
2011	A season	10,879,701	CF		3	4	CF	CF
	B season	4,662,729 ^g	CF		4	16	CF	CF
	TOTAL	15,542,430	595,289	N	6 ^e	20	CF	CF
2012	A season	14,537,132	11,462,339		21	201	\$0.31	\$3.60
	B season	6,230,200 ^g	953,312		7	25	CF	CF
	TOTAL	20,767,332	12,341,027	N	26 ^e	226	CF	CF
2013	A season	14,213,056	CF		12	CF	CF	CF
	B season	6,091,310 ^g	CF		1	CF	CF	CF
	TOTAL	20,304,366	10,563,646	N	13	151	CF	CF
2014	A season	12,504,712	CF		8	133	CF	CF
	B season	5,359,162 ^g	0		0	0	\$0.00	\$0.00
	TOTAL	17,863,874	CF	N	8	133	CF	CF
2015	A season	12,620,583	CF		2	CF	CF	CF
	B season	5,408,821 ^g	0		0	0	\$0.00	\$0.00
	TOTAL	18,029,404	CF	N	2	CF	CF	CF
2016		10,476,259 ^h	CF	N	6	39	CF	CF
2017		12,797,703	CF	N	3	84	CF	CF
2018		12,798,000	CF	Y	14	132	CF	CF

Note: CF = Confidential

^a In whole fish pounds.

^b Price per pound of landed weight.

^c Fishery value based on landed weight, in millions of dollars.

^d ADF&G made 3.5 million pounds of the GHL available to National Marine Fisheries Service effective on September 1.

^e Some vessels participated in both seasons.

^f Overage from the A season was deducted from the B season GHL. Initial GHL shown.

^g A season GHL was not fully harvested, remaining A season GHL rolled over into B season GHL; initial GHL shown.

^h Regulation changed to only one season for Aleutian Island Subdistrict state-waters Pacific cod.

Table 7-3.—Number of vessels by gear type and vessel size in the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2006–2018.

Year	Longline		Jig		Pot		Trawl		Total vessels
	<59 ft	>58 ft	<61 ft	61–125 ft	<61 ft	61–125 ft	<61 ft	61–100 ft	
2006 ^a	3	5	0	0	0	3	3	17	31
2007	0	0	0	0	1	11	7	13	32
2008 ^b	7	2	5	0	3	11	5	17	50
2009	6	0	2	0	0	3	6	10	27
2010 ^c	0	1	0	0	0	6	4	9	20
2011	2	1	0	0	0	2	0	2	7
2012 ^c	6	0	3	0	6	0	7	9	31
2013	1	0	0	0	7	0	1	4	13
2014	0	0	0	0	4	0	2	2	8
2015	0	0	0	0	0	0	0	2	2
2016	0	0	0	0	0	0	0	6	6
2017	0	0	0	0	3	0	0	0	3
2018 ^c	0	0	0	0	6	2	5	1	14

Source: ADF&G fish ticket database.

^a No vessel size restrictions. Vessels as big as 175 feet OAL using longline gear and up to 300 feet OAL using pot gear participated in 2006.

^b Two vessels switched gears during the season.

^c One vessel switched gears during the season.

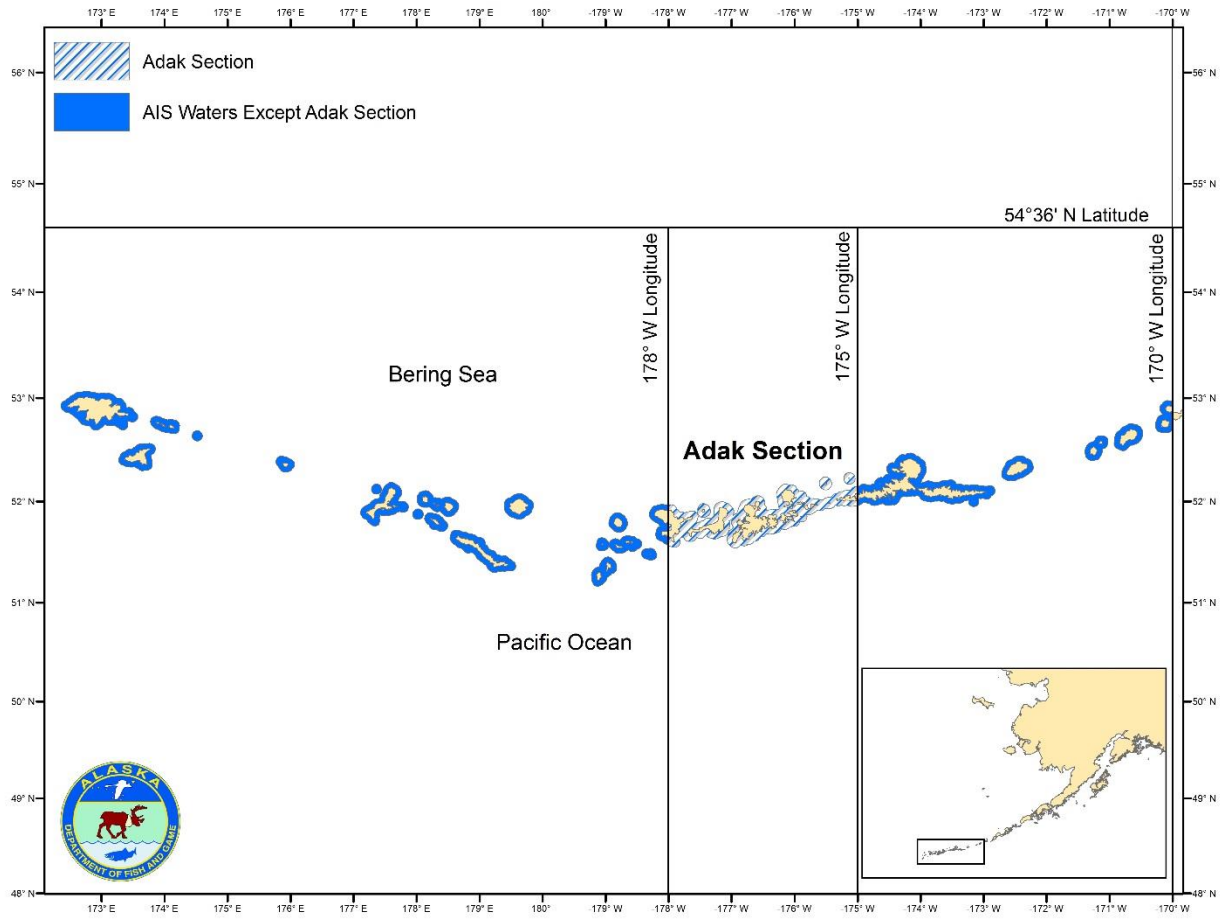


Figure 7-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery map.

PROPOSAL 8 – 5 AAC 28.647. Aleutian Islands Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Daniel Veerhusen.

WHAT WOULD THE PROPOSAL DO? Limit pot gear vessels to operating no more than 60 groundfish pots in the AIS state-waters Pacific cod fishery.

WHAT ARE THE CURRENT REGULATIONS? There are no limits on the amount of gear a vessel may operate in the AIS fishery although all vessels are restricted to possessing or delivering a maximum of 150,000 pounds whole weight of Pacific cod per fishing trip.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Most pot gear vessels register more than 60 pots in the AIS. These vessels may experience reduced harvest rates with a 60 pot limit. Lower harvest rates may provide additional opportunity for smaller pot gear vessels that are not capable of operating large complements of gear. Alternatively, reduced efficiency for the pot gear sector may increase harvest opportunity for trawl and longline vessels resulting in a shift towards gear types with higher harvest capacity.

BACKGROUND: The AIS state-waters Pacific cod fishery opens January 1 in the Adak Section (between 175°W long to 178°W long) to vessels 60 feet or less OAL using trawl, pot, jig, and vessels 58 feet or less OAL using longline gear. All remaining waters of the AIS open for pot vessels 125 feet or less, trawl vessels 100 feet or less, and longline and jig vessels 58 feet or less, either 4 days after the Bering Sea and Aleutian Islands parallel A season for the catcher-vessel trawl fishery is closed, 4 days after the federal Aleutian Islands Subarea non-CDQ season is closed, or March 15; whichever occurs first.

The GHF is currently set 27% of the federal BSAI Pacific cod ABC. If the GHF is achieved during a calendar year, the GHF the following year increases by 4% of the federal ABC to 31% of the federal ABC. The GHF increases by 4% of the federal ABC, following each year that the GHF is achieved to a maximum of 39%. However, the GHF is capped at 15 million pounds irrespective of the established allocation should the derived GHF exceed 15 million pounds.

The GHF for the 2018 season totaled 12,798,000 pounds. Fourteen vessels participated in the fishery, including 8 pot vessels and 6 trawl vessels (Table 8-1); one vessel switched from pot gear to trawl gear during the season. The average number of pots registered per vessel in 2018 was 102 pots (Table 8-2). The 2018 season was open for 81 days. Harvest is confidential.

During the 2018 season, most pot vessels registered to fish more than 60 pots (Table 8-2) Vessels that fished between 61 and 75 pots harvested 53% of the total harvest (Table 8-3). Average CPUE for vessels using 60 or less pots was 261 pounds of Pacific cod per pot, whereas vessels using more than 60 pots averaged 311 pounds per pot (Table 8-4).

In 2018, pot vessels harvested 84% of the total harvest in 100 trips. Trawl vessels harvested the remaining 16% of harvest in 19 trips (Table 8-5). Average CPUE for the season was 318 pounds per pot for pot all vessels combined; whereas, trawl vessels averaged 10,016 pounds per tow

(Table 8-5). The department does not have an established groundfish observer program. Estimates of bycatch for all participating gear types are unavailable.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal would result in a nominal additional direct cost for pot gear vessels to participate in this fishery. Participants would be required to purchase 60 buoy tags at \$1.50 per tag.

Table 8-1.—Aleutian Islands Subdistrict state-waters Pacific cod fishery number of vessels by gear type, 2006–2018.

Year	Longline	Jig	Pot	Trawl	Total
2006 ^a	8	0	3	20	31
2007 ^a	7	1	12	20	40
2008 ^a	9	5	14	22	50
2009 ^a	6	2	3	16	27
2010 ^a	1	0	6	13	20
2011 ^a	3	0	2	2	7
2012 ^a	6	3	6	14	29
2013 ^a	1	0	7	5	13
2014 ^a	0	0	4	4	8
2015 ^a	0	0	0	2	2
2016	0	0	0	6	6
2017	0	0	3	0	3
2018	0	0	8	6	14

Source: ADF&G fish ticket database.

^a Vessel number is total for both A and B seasons.

Table 8-2.—Average number of pots registered per vessel, by year and vessel size in the Aleutian Islands Subdistrict state-waters Pacific cod fishery, 2013–2018.

Year	Less than 60 feet	Greater than 60 feet	Overall Average
2013	105	—	105
2014	116	—	116
2015 ^a	—	—	—
2016 ^a	—	—	—
2017	62	—	62
2018	63	200	102

Source: ADF&G Aleutian Islands Subdistrict state-waters Pacific cod registration forms.

Note: Data not available for years prior to 2013.

^a No pot vessels registered to fish in 2015 and 2016.

Table 8-3.—Percent of total harvest caught by number of pots registered per vessel in the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

Number of Pots	Percent of Harvest
60 and under	7
61 to 75	55
76+	7

Source: ADF&G fish ticket database.

Table 8-4.—Average CPUE for the entire season by number of pots registered to fish in the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

No. of Pots	Average CPUE
60 and under	261
61+	311

Source: ADF&G fish ticket database.

Table 8-5.—Number of trips, percent of harvest, and average CPUE by gear type in the 2018 Aleutian Islands Subdistrict state-waters Pacific cod fishery.

Gear type	Number of trips	Percent of harvest	Average CPUE
Pot	100	84	318
Trawl	19	16	10,016

Source: ADF&G fish ticket database.

Note: Average CPUE for pot gear is round pounds per pot and round pounds per tow for trawl gear.

PROPOSAL 9 – 5 AAC 28.629. Lawful gear for Bering Sea-Aleutian Islands Area.

PROPOSED BY: Robert Magnus Thorstenson Jr.

WHAT WOULD THE PROPOSAL DO? Close all state-waters in the Bering Sea District to vessels fishing for Pacific cod with nonpelagic trawl gear while the DHS state-waters Pacific cod pot gear season is open (Figure 9-1).

WHAT ARE THE CURRENT REGULATIONS? Concurrent to a federal Pacific cod fishery, the state opens a parallel fishery inside state waters and adopts most federal rules and management actions to provide for regulatory consistency across state and federal jurisdictions. All harvest from parallel waters is deducted from the corresponding federal TAC for the target species and gear/processing sector. Currently, while the DHS state-waters Pacific cod fishery is open, parallel waters within the DHS are closed only to vessels 60 feet or less in length targeting Pacific cod with pot gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Excluding nonpelagic trawl vessels from parallel waters would not restrict or reduce trawl TAC availability, however, trawl vessels would lose some flexibility on preferred fishing location. Trawl harvest of Pacific cod in parallel waters while the DHS fishery is open is nominal relative to overall trawl harvest. Trawl vessels would continue to have access to the full TAC in federal waters or inside state-waters before and after the DHS fishery is closed. Trawl vessels benefit from access to the parallel fishery when fish abundance is high in nearshore waters, during periods of poor weather, or to avoid bycatch in other areas. It is unknown how much benefit would be lost if trawl vessels were precluded from the parallel fishery while state-waters pot gear season was open.

The department annually receives reports of trawl and pot gear interactions during the DHS state-waters fishery. The department acknowledges these interactions occur but does not track or quantify effects. This proposal may reduce gear interactions during some years, however, gear interactions are still likely to occur among pot and trawl vessels that choose to operate at or near the 3 nautical mile federal/state-waters boundary line.

BACKGROUND: The first DHS state-waters Pacific cod fishery occurred in 2014. The season opens 7 days after the federal BSAI under 60 feet pot and longline gear sector closes. The DHS season generally starts in early February and has been open on average for 49 days. Only pot gear vessels 58 feet or less OAL may participate in the fishery, and no more than 60 pots may be operated by a vessel.

When the state-waters Pacific cod fishery is open (Figure 9-2), the parallel fishery closes for pot vessels 60 feet or less in length targeting Pacific cod with pot gear. Parallel waters remain open for all other vessel size and gear types. For the past 10 years, parallel harvest of Pacific cod in the Bering Sea Aleutian Islands (Area O) across all gear types ranged between 3.4 and 11.0 million pounds annually (Table 9-1). Parallel Pacific cod harvested by trawl vessels in the DHS while the DHS state-waters fishery was open averaged 965,000 pounds per year but has been generally declining since the inception of the state-waters fishery. By comparison, annual

parallel harvest of Pacific cod during the DHS state-waters fishery by longline and pot vessels over 60 feet OAL averaged 2.8 million and 2.2 million pounds respectively (Table 9-2).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Boundary lines for the DHS fishery and the Bering Sea District groundfish registration area differ. The DHS state-waters Pacific cod fishery occurs in both the Bering Sea and Aleutian Islands districts (Figure 9-2). As written, this proposal would only close parallel waters of the DHS that reside within the Bering Sea District. It would also close the parallel fishery for nonpelagic trawl vessels in all other state-waters of the Bering Sea District outside of the DHS yet leave that portion of the DHS that resides within the Aleutian Islands District open to trawl fishing while the state-waters season is open. If the intent of this proposal is to reduce pot and trawl gear interactions during the DHS state-waters fishery, the department recommends limiting the effects of this proposal only to waters of the DHS described in 5 AAC 28.648(a) while the state-waters fishery is open.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 9-1.–Bering Sea-Aleutian Islands Area parallel Pacific cod fishery number of vessels and landings, harvest in whole pounds by gear type, and at-sea discards, 1995–2017.

Year	Vessels	Landings	Harvest				Total	At-sea discards
			Trawl	Longline	Pot	Jig/hand troll		
1995	146	1,030	12,240,195	1,990,938	5,486,619	773,895	20,491,646	47,630
1996	157	956	5,760,550	444,538	11,540,368	407,811	18,153,267	104,680
1997	104	378	809,297	1,465,696	2,064,358	208,326	4,547,676	15,988
1998	110	400	3,975,738	4,128,807	3,624,994	210,316	11,939,854	75
1999	129	500	8,963,780	1,444,465	7,105,630	281,754	17,795,629	4,978
2000	161	573	5,369,957	3,604,038	6,523,840	102,903	15,600,739	16,654
2001	129	403	7,035,831	3,973,338	3,145,956	172,405	14,327,530	8,468
2002	111	369	13,768,587	481,119	1,887,114	351,404	16,488,224	3,493
2003	111	450	13,456,640	841,821	4,928,807	144,477	19,371,745	13,358
2004	117	568	12,247,656	1,841,934	4,616,764	461,553	19,167,907	33,153
2005	92	381	4,056,390	2,526,537	3,116,586	233,947	9,933,460	11,595
2006	107	349	2,470,193	1,238,093	2,998,600	141,285	6,848,171	51,423
2007	109	337	3,924,415	1,401,829	1,507,579	180,322	7,014,145	23,405
2008	108	372	2,526,207	2,542,514	4,582,253	327,512	9,978,486	19,875
2009	81	224	1,659,521	690,143	3,697,654	27,693	6,075,011	12,266
2010	80	308	3,247,752	2,106,124	4,949,276	736,802	11,039,954	12,990
2011	81	278	311,666	1,500,220	2,333,841	946,814	5,092,541	15,856
2012	63	204	163,562	2,413,244	1,577,736	186,731	4,341,273	4,994
2013	57	188	92,961	2,660,883	605,520	23,983	3,383,347	24,039
2014	34	231	106,441	7,865,970	1,186,530	1,324	9,160,264	19,505
2015	67	258	2,630,870	4,065,759	1,672,730	61,735	8,431,094	25,682
2016	57	159	2,220,049	1,820,888	3,014,448	62,247	7,117,632	26,705
2017	71	185	656,555	2,443,576	4,281,339	10,326	7,391,796	33,983

Table 9-2.—Parallel Pacific cod harvest (whole pounds) by gear type during the Dutch Harbor Subdistrict state-waters Pacific cod fishery, 2014–2018.

Season	Longline	Mechanical jigs	Nonpelagic/ bottom trawl	Pelagic/mid-water trawl	Pot
2014	4,351,151	1,324	-	3,094	297,571
2015	3,318,169	61,735	2,256,671	174,834	1,660,525
2016	1,814,543	62,247	1,638,978	5,780	3,020,170
2017	1,585,330	10,326	395,988	2,575	3,607,530
2018	2,678,619	-	531,793	422	2,600,998
Average	2,749,562	27,126	964,686	37,341	2,237,359

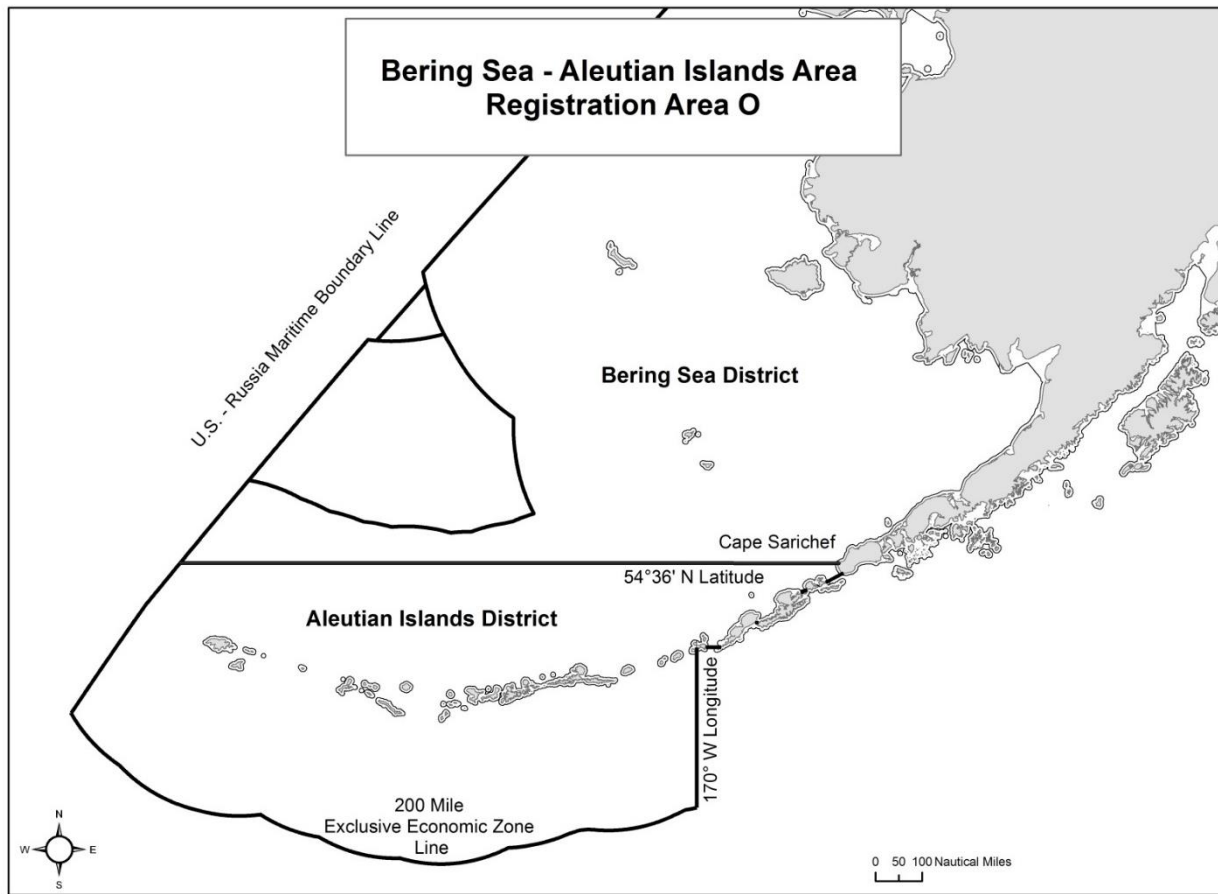


Figure 9-1.—Bering Sea-Aleutian Islands Area for groundfish management.

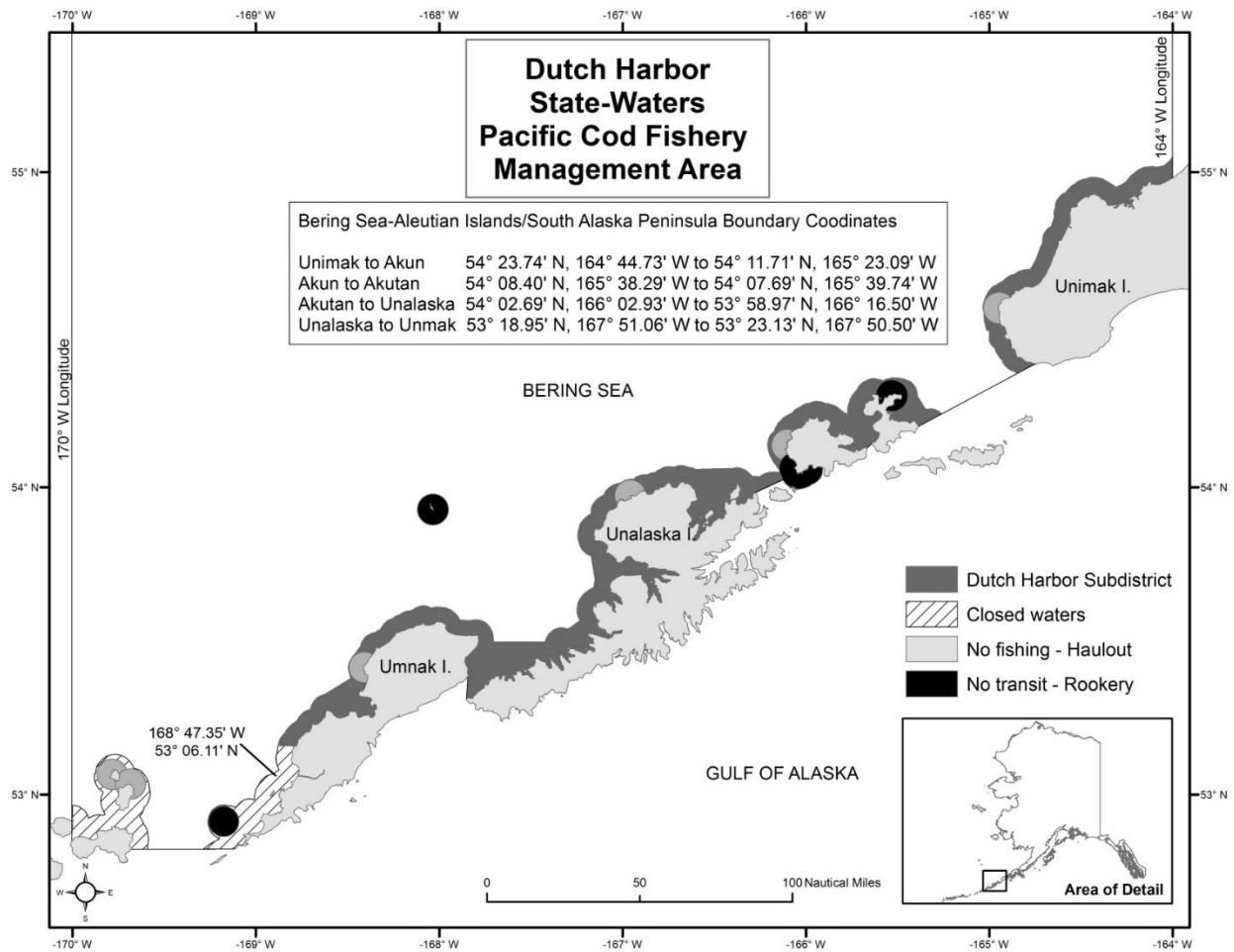


Figure 9-2.—Dutch Harbor Subdistrict state-waters Pacific cod fishery management area.

PROPOSAL 10 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: King Cove Advisory Committee.

WHAT WOULD THE PROPOSAL DO? Extend the eastern boundary of the DHS) state-waters Pacific cod fishery from 164°W long to 162°30' W long.

WHAT ARE THE CURRENT REGULATIONS? The DHS is defined as state-waters of the Bering Sea east of 170°W long, west of 164°W long, south of 55°30' N lat, and north of 53°06.11' N lat (Figure 10-1).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Extending the eastern boundary line to 162°30' W long may allow vessels to more widely distribute effort and harvest during the DHS state-waters Pacific cod fishery. It is unknown if expanding the fishing area will influence harvest rates or the number of vessels that elect to participate in the state-waters fishery. Vessels with traditional markets in the Gulf of Alaska (False Pass, King Cove, Sand Point) may have improved access to the fishery due to shorter transit times from the Bering Sea to the Gulf of Alaska through False Pass. Nominal fishing effort and harvest occurs in the proposed area during federal/parallel Pacific cod pot gear fisheries.

BACKGROUND: In 2013, the board adopted a state-waters Pacific cod management plan for the DHS and the first state-waters season occurred in 2014. The state-waters GHL is based on 6.4% of the federal Bering Sea Subarea ABC and the season opens 7 days after closure of the federal BSAI season for longline and pot gear catcher vessels less than 60 feet in length. Only pot gear vessels 58 feet in length or less may participate in the fishery and no more than 60 pots may be operated by a vessel.

The state-waters GHL has been achieved every year since the inception of the fishery. From 2014 through 2018, annual harvest averaged 26.6 million pounds of Pacific cod. Exvessel value averaged \$8.3 million and an average of 22 vessels annually participated in the fishery (Table 10-1). The state-waters season generally starts in early February and the season has been open for 49 days on average.

During the 2014 and 2015 seasons, the DHS was limited to state-waters of the Bering Sea between 164°W long and 167°W long. In 2015, the board expanded waters the DHS to include most state-waters of the Bering Sea between 164°W long and 170°W long (Figure 10-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 10-1.–Dutch Harbor Subdistrict state-waters Pacific cod effort, GHL, harvest, and exvessel value, by year, 2014–2018.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	Price per pound	Exvessel value
2014	16	205	17,863,874	17,666,510	\$0.28	\$5,006,797
2015	14	183	18,029,404	17,636,103	\$0.27	\$4,763,751
2016	24	421	35,979,072	35,519,920	\$0.28	\$9,846,051
2017	24	349	33,721,562	33,247,414	\$0.30	\$10,067,240
2018	32	286	28,360,000	29,055,603	\$0.41	\$11,817,047
Avg.	22	289	26,790,782	26,625,110	\$0.31	\$8,300,177

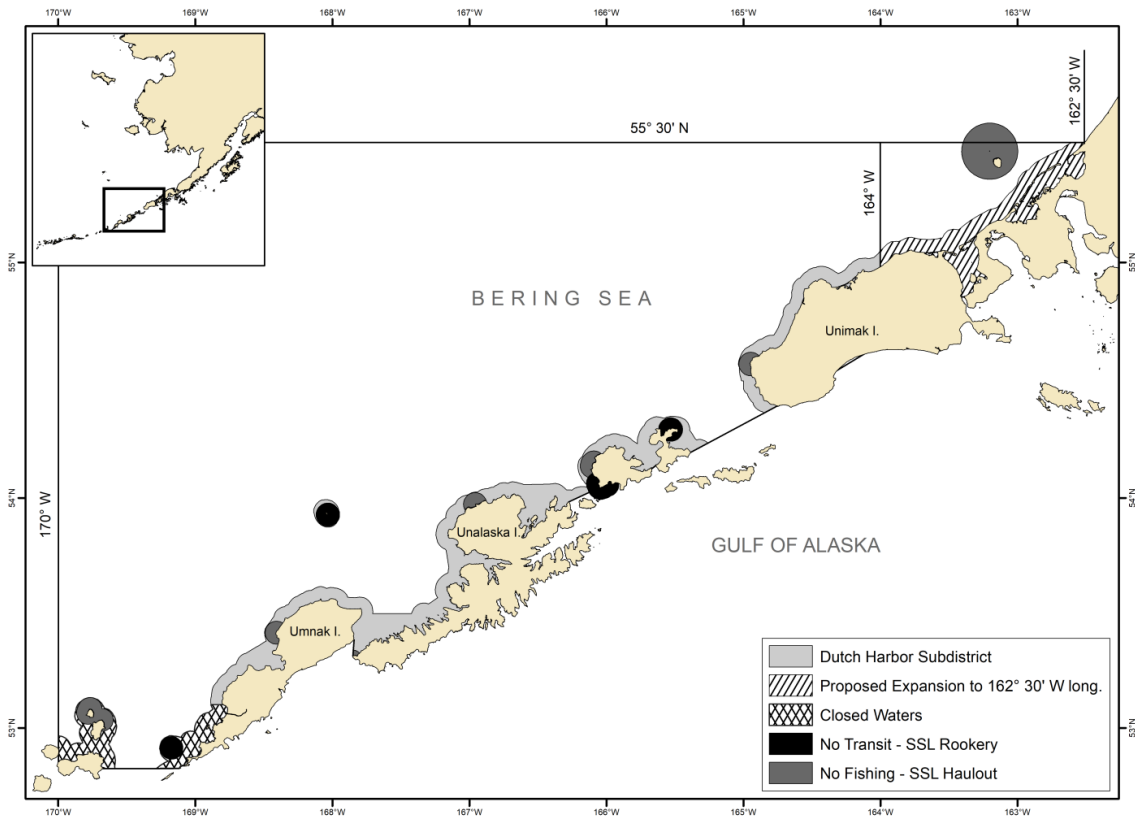


Figure 10-1.–Map of current and proposed areas open to fishing during the Dutch Harbor Subdistrict state-waters Pacific cod fishery.

PROPOSAL 11 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Adam Lalich.

WHAT WOULD THE PROPOSAL DO? Include mechanical jig gear in the *Dutch Harbor Subdistrict Pacific Cod Management Plan* and specify provisions for gear limits, vessel exclusivity, state-waters and parallel season open and closure dates, closed waters, and a 100,000 pound harvest limit for vessels using mechanical jig gear. Additionally, this would define a new management section, the Umnak Pass Section, within the DHS.

WHAT ARE THE CURRENT REGULATIONS? The DHS Pacific cod state-waters fishery opens 7 days following the closure of the initial season for the federal Bering Sea and Aleutian Islands less than 60 feet OAL hook-and-line and pot catcher vessel sector. Groundfish pots are the only legal gear type in the fishery. The GHF is based on 6.4% of the federal Bering Sea subarea Pacific cod ABC.

The current DHS state-waters Pacific cod fishery is not open to vessels using jig gear. Jig gear vessels are currently eligible to participate in an established BSAI parallel jig gear fishery. During the federal/parallel fishery, the jig gear sector is allocated 1.4% of the federal BSAI Pacific cod TAC. During a parallel fishery, the state adopts most federal fishing regulations and SSL area closures, including regulations concerning the Bogoslof Island SSL Protection Area (Bogoslof Area) closure and Bogoslof Pacific Cod Exemption Area which are located within the DHS (Figure 11-1)

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would establish a DHS state-waters mechanical jig gear fishery that largely mirrors the existing parallel jig gear fishery in the BSAI. Notably, a state-waters fishery would differ from the parallel fishery in that it would provide unrestricted access to a federally defined fishery closure area for the protection of Stellar sea lions in waters north of Unalaska and Umnak Islands referred to as the Bogoslof Island foraging area. This would reduce pot gear allocation in DHS by 100,000 pounds and provide a new fishing opportunity for vessels using mechanical jig gear.

BACKGROUND: During the federal/parallel BSAI Pacific cod fishery, the jig gear sector is allocated 1.4% of the federal BSAI Pacific cod TAC. In the past 5 years, the federal jig TAC ranged between 5.6 and 7.0 million pounds annually. Jig harvest data is confidential but annual catch typically represent less than 1% of the annual jig gear TAC. A total of 7 jig vessels have participated in the fishery since 2014. Unharvested jig gear TAC is annually reallocated to other federal Pacific cod gear sectors to prevent foregone harvest.

The Bogoslof Area is closed to fishing for the protection of SSLs during federal/parallel Pacific cod fisheries (Figure 11-1). However, a subsection of the Bogoslof Area, known as the Bogoslof Pacific Cod Exemption Area allows catcher vessels less than 60 feet OAL using jig or hook-and-line gear to harvest up to 113 mt of Pacific cod, after which the exemption area closes for the remainder of the year. Since 2003, the Bogoslof Pacific Cod Exemption Area has closed in all but 3 years (2012, 2016, 2017). Exemption area closures generally occur in February or March

prior to most jig gear effort in the Bering Sea. Therefore, the Bogoslof Area is minimally accessible for vessels using jig gear during the parallel fishery whereas vessels participation in a state-waters can harvest up to the full GHL in the same area without restriction as the Bogoslof Area closure is not recognized in state regulation.

Though coordination with the federal fishery management process, addressing closed waters in the Bogoslof Area for jig gear vessels during the parallel fishery may alleviate the need to establish a second jig fishery in the BSAI. Similar coordinated approaches have been used to mitigate impacts of SSL closures on other parallel and state-waters Pacific cod fisheries under 5 AAC 28.087(b)(1-4).

DEPARTMENT COMMENTS: During other state-waters fisheries with more than one gear type, the department typically manages the fishery using a single areawide GHL with separate gear allocations specified in regulation. In practice, the DHS pot gear fishery would likely be concluded for the year prior to any jig effort occurring in the DHS. In this situation, department staff would be required to close the DHS pot gear fishery with 100,000 pounds of jig gear GHL allocation remaining to preserve jig opportunity later in the year. DHS pot gear vessels commonly harvest upwards of one million pounds of Pacific cod per day. Should pot gear harvest exceed the pot gear GHL allocation by over 100,000 pounds in any year, the jig gear fishery would be closed to prevent exceeding the GHL. It is unlikely the department has capability to regulate the pot gear fishery such that the 100,000 pound jig gear allocation would be consistently available for participants.

The department supports providing additional fishing opportunity for vessels using mechanical jig gear. Prior to establishing a DHS state-waters jig fishery the department recommends discussion with NMFS or NPFMC to assess if other options are available to improve jig access during the underutilized federal/parallel jig fishery.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

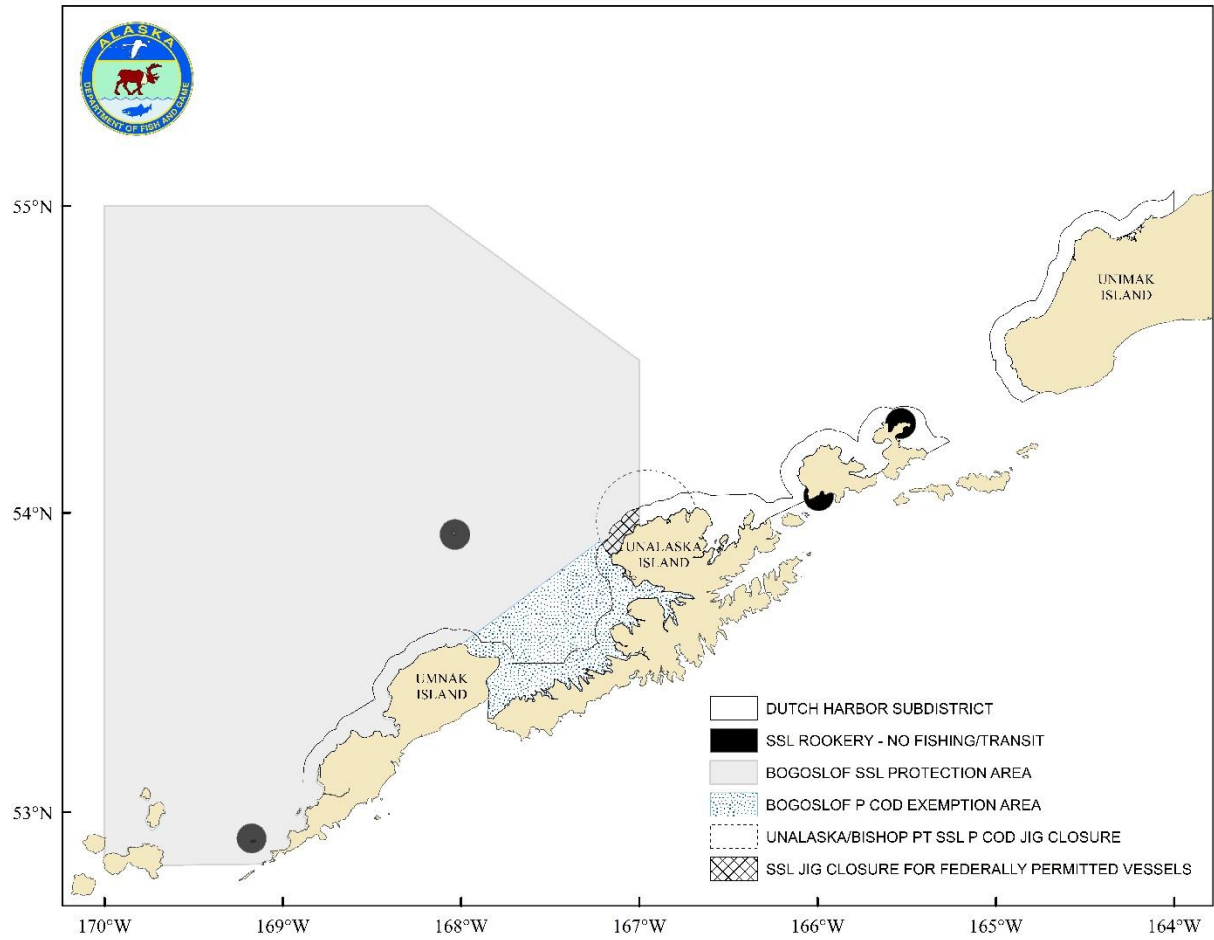


Figure 11-1.—Map of Dutch Harbor Subdistrict for state-waters Pacific cod including federal Bogoslof SSL protection areas.

PROPOSAL 12 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Robert Magnus Thorstenson Jr.

WHAT WOULD THE PROPOSAL DO? Increase DHS state-waters Pacific cod fishery GHL allocation basis from 6.4% to 20% of the federal Bering Sea Subarea Pacific cod ABC.

WHAT ARE THE CURRENT REGULATIONS? The DHS state-waters Pacific cod fishery GHL is based on 6.4% of the federal Bering Sea Subarea Pacific cod ABC.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A 20% allocation of federal Bering Sea ABC for the state-waters fishery would substantially increase harvest opportunity for vessels eligible to participate in the state-waters fishery (Table 12-1). This would likely draw additional effort to the fishery and initially provide for longer state-waters seasons. Increasing the GHL allocation by an additional 13.6% of the federal Bering Sea Subarea Pacific cod ABC would result in a corresponding decrease in federal Pacific cod TAC during most years. A redistribution of federal TAC would result in lower harvests, shorter seasons, and increased competition among vessels that have historically participated in the Bering Sea Subarea federal/parallel Pacific cod fisheries.

The proposed ABC allocation could result in GHLS that are unattainable by the state-waters Pacific cod fleet. Lack of a mechanism to scale GHL to annual harvest capacity either pre-season or while the fishery is open could result in foregone harvest of Pacific cod ABC for all users.

The current timing of the DHS season generally corresponds with Pacific cod spawn timing in the Bering Sea. The effects concentrating removals inside state-waters of the DHS on the overall productivity of the stock are unknown. Extending season lengths beyond the spawning period could additionally result in lower product recovery for processors.

The Gulf of Alaska Pacific cod stock is managed independent of the Bering Sea and Aleutian Islands stocks. The southern boundary of the DHS corresponds with the northern boundary of the Western Gulf of Alaska Management Area. A higher GHL may increase unintended harvest of Gulf of Alaska Pacific cod when fishing effort occurs near the boundary line.

BACKGROUND: In 2013, the board adopted a state-waters Pacific cod management plan for the DHS and the first state-waters season occurred in 2014. The initial GHL for the DHS was based on 3% of the combined federal Bering Sea Subarea and Aleutian Islands Subarea ABC. In 2014, the NPFMC adopted separate Pacific cod ABCs for the Bering Sea and Aleutian Islands subareas in response to genetic differences across the 2 stocks and address concerns about declining Aleutian Islands Pacific cod abundance. In 2015, the board modified the DHS Pacific cod management plan in accordance with the federal action to ensure the DHS GHL was based exclusively on the Bering Sea Subarea ABC. At the time of this action the board additionally increased the ABC contribution to the state-waters fishery resulting in a GHL allocation of 6.4% of the Bering Sea Subarea ABC which effectively doubled the GHL relative to the initial allocation first set in 2014.

The federal/parallel BSAI Pacific cod TAC is subdivided across 11 harvesting sectors. Since 1999, each federal/parallel harvesting sector has received a separate allocation of Pacific cod TAC (Table 12-2). Any increase in the state-waters GHL proportionally reduces the federal TAC available to the federal harvesting sectors. The federal/parallel Pacific cod fisheries are divided into A and B seasons. A seasons open for most harvesting sectors on January 1 while B seasons open September 1 for most harvesting sectors.

From 2014 through 2018, harvest of Pacific cod during the parallel fishery averaged 6.2 million pounds which accounts for 1.2% of the total Bering Sea Subarea Pacific cod ABC (Table 12-3). During that time, the total harvest from state waters (state-waters and parallel catch combined) averaged 6.2% of the total Bering Sea Subarea Pacific cod ABC (Table 12-3).

The DHS state-waters season opens 7 days after closure of the federal BSAI season for longline and pot gear catcher vessels less than 60 feet OAL. Only pot gear vessels 58 feet or less in length may participate in the state-waters fishery and no more than 60 pots may be operated by a vessel. State-waters Pacific cod fishery vessels are not required to carry onboard fishery observers.

The state-waters GHL has been achieved every year since the inception of the fishery. From 2014 through 2018, annual state-waters fishery harvest averaged 26.6 million pounds of Pacific cod (Table 12-4). Vessel effort ranged between 14 and 32 boats. Exvessel value averaged \$8.3 million annually since inception of the fishery. State-waters seasons generally open early February and the fishery was open on average for 49 days since 2014. Estimated daily harvest averaged 900,000 pounds during the 2018 season. At the 2018 estimated daily catch rate, the season would have been extended by approximately 67 days assuming a GHL of 88.6 million pounds based in the proposed ABC allocation.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department is opposed to establishing harvest levels that may result in foregone harvest.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 12-1.–Bering Sea Subarea Pacific cod ABC apportionment and proposed state-waters allocations for comparison, in pounds, by year, 2016–2018.

Year	BS ABC	93.4% BS		6.4% DHS		Proposed 20% DHS	
		Federal TAC	state-waters GHL	Federal TAC	state-waters GHL	Federal TAC	state-waters GHL
2016	562,173,000	526,193,928	35,979,072	526,193,928	35,979,072	112,434,600	112,434,600
2017	526,899,400	493,177,838	33,721,562	493,177,838	33,721,562	105,379,880	105,379,880
2018	443,124,600	414,764,626	28,359,974	414,764,626	28,359,974	88,624,920	88,624,920

Table 12-2.—Bering Sea–Aleutian Islands federal Pacific cod harvesting sectors and TAC allocations, 2018.

BSAI federal Pacific cod harvesting sectors	2018 TAC allocations (%)	2018 TAC (pounds)
Bering Sea CDQ	NA	44,380,803
Aleutian Islands CDQ	NA	3,701,523
Longline catcher processor	48.7%	194,719,090
Longline catcher vessel \geq 60 ft	0.2%	800,270
Pot catcher processor	1.5%	5,996,512
Pot catcher vessel \geq 60 ft	8.4%	33,587,081
Longline or pot catcher vessel <60 ft	2.0%	7,996,084
Trawl catcher vessel	22.1%	88,684,444
AFA trawl catcher processor	2.3%	9,228,456
Amendment 80 trawl catcher processor	13.4%	53,772,399
Jig	1.4%	5,617,321
Total	100.0%	448,483,983

Table 12-3.—Dutch Harbor Subdistrict pot gear Pacific cod harvest during state-waters and parallel fisheries, in pounds, as a percent of the ABC, by year, all gear combined, 2014–2018.

Year	Bering Sea ABC (pounds)	State-waters (GHL)			Parallel (TAC)			State-waters and parallel		
		Vessels	Harvest (pounds)	Percent of ABC	Vessels	Harvest (pounds)	Percent of ABC	Vessels	Harvest (pounds)	Percent of ABC
2014	562,173,000	16	17,666,510	3.1%	15	6,577,217	1.2%	26	24,243,727	4.3%
2015	562,173,000	14	17,636,103	3.1%	30	7,094,032	1.3%	38	24,730,135	4.4%
2016	562,173,000	24	35,519,920	6.3%	24	6,517,493	1.2%	37	42,037,412	7.5%
2017	526,899,400	24	33,247,414	6.3%	18	5,482,427	1.0%	33	38,729,842	7.4%
2018	443,124,600	32	29,055,603	6.6%	14	5,249,466	1.2%	38	34,305,069	7.7%
Avg.	531,308,600	22	26,625,110	5.0%	20	6,184,127	1.2%	34	32,809,237	6.2%

Table 12-4.—Dutch Harbor Subdistrict state-waters Pacific cod effort, GHL, harvest, and exvessel value, by year, 2014–2018.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	Price per pound	Exvessel value
2014	16	205	17,863,874	17,666,510	\$0.28	\$5,006,797
2015	14	183	18,029,404	17,636,103	\$0.27	\$4,763,751
2016	24	421	35,979,072	35,519,920	\$0.28	\$9,846,051
2017	24	349	33,721,562	33,247,414	\$0.30	\$10,067,240
2018	32	286	28,360,000	29,055,603	\$0.41	\$11,817,047
Avg.	22	289	26,790,782	26,625,110	\$0.31	\$8,300,177

PROPOSAL 13 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Under Sixty Cod Harvesters.

WHAT WOULD THE PROPOSAL DO? Increase DHS state-waters Pacific cod fishery GHL allocation basis from 6.4% to 10% of the federal Bering Sea Subarea Pacific cod ABC. This proposal would also expand the geographical extent of the DHS by shifting the eastern boundary from 164°W long to 163°30' W long (Figure 13-1).

WHAT ARE THE CURRENT REGULATIONS? The DHS state-waters Pacific cod fishery GHL is based on 6.4% of the federal Bering Sea Subarea Pacific cod ABC. The DHS is defined as state-waters in the Bering Sea east of 170°W long, west of 164°W long, south of 55°30' N lat, and north of 53°06.11' N lat (Figure 13-1).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A 10% allocation of federal Bering Sea ABC for the state-waters fishery would increase harvest opportunity for vessels eligible to participate in the state-waters fishery (Table 13-1). This could draw additional effort to the fishery and initially provide for longer state-waters seasons. Increasing the GHL allocation by an additional 3.6% of the federal Bering Sea Subarea Pacific cod ABC would result in a corresponding decrease in federal Pacific cod TAC during most years. A redistribution of federal TAC would result in lower harvests, shorter seasons, and increased competition among vessels that have historically participated in the Bering Sea Subarea federal/parallel Pacific cod fisheries.

The proposed ABC allocation could result in GHLS that are unattainable by the state-waters Pacific cod fleet when Pacific cod abundance in the Bering Sea is high. Lack of a mechanism to scale GHL to annual harvest capacity either pre-season or while the fishery is open could result in foregone harvest of Pacific cod ABC for all users.

The current timing of the DHS season generally corresponds with Pacific cod spawn timing in the Bering Sea. The effects concentrating removals inside state-waters of the DHS on the overall productivity of the stock are unknown. Extending season lengths beyond the spawning period could additionally result lower product recovery for processors.

The Gulf of Alaska Pacific cod stock is managed independent of the Bering Sea and Aleutian Islands stocks. The southern boundary of the DHS corresponds with the northern boundary of the Western Gulf of Alaska Management Area. A higher GHL may increase unintended harvest of Gulf of Alaska Pacific cod when fishing effort occurs near the boundary line.

Extending the eastern boundary line to 163°30' W long may allow vessels to more widely distribute effort and harvest during the DHS state-waters Pacific cod fishery. It is unknown if expanding the fishing area will influence harvest rates or the number of vessels that elect to participate in the state-waters fishery. Vessels with traditional markets in the Gulf of Alaska (False Pass, King Cove, Sand Point) may have improved access to the fishery due to shorter transit times from the Bering Sea to the Gulf of Alaska through False Pass. Nominal fishing effort and harvest currently occurs in the proposed area during federal/parallel Pacific cod pot gear fisheries.

BACKGROUND: In 2013, the board adopted a state-waters Pacific cod management plan for the DHS and the first state-waters season occurred in 2014. The initial GHL for the DHS was based on 3% of the combined federal Bering Sea Subarea and Aleutian Islands Subarea ABC. In 2014, the NPFMC adopted separate Pacific cod ABCs for the Bering Sea and Aleutian Islands subareas in response to genetic differences across the 2 stocks and address concerns about declining Aleutian Islands Pacific cod abundance. In 2015, the board modified the DHS Pacific cod management plan in accordance with the federal action to ensure the DHS GHL was based exclusively on the Bering Sea Subarea ABC. At the time of this action the board additionally increased the ABC contribution to the state-waters fishery resulting in a GHL allocation of 6.4% of the Bering Sea Subarea ABC which effectively doubled the GHL relative to the initial allocation first set in 2014.

The federal/parallel BSAI Pacific cod TAC is subdivided across 11 harvesting sectors. Since 1999, each federal/parallel harvesting sector has received a separate allocation of Pacific cod TAC (Table 13-2). Any increase in the state-waters GHL proportionally reduces the federal TAC available to the federal harvesting sectors. The federal/parallel Pacific cod fisheries are divided into A and B seasons. A seasons open for most harvesting sectors on January 1 while B seasons open September 1 for most harvesting sectors.

From 2014 through 2018, harvest of Pacific cod during the parallel fishery averaged 6.2 million pounds which accounts for 1.2% of the total Bering Sea Subarea Pacific cod ABC (Table 13-3). During that time, the total harvest from state waters (state-waters and parallel catch combined) averaged 6.2% of the total Bering Sea Subarea Pacific cod ABC (Table 13-3).

The DHS state-waters season opens 7 days after closure of the federal BSAI season for longline and pot gear catcher vessels less than 60 feet in length. Only pot gear vessels 58 feet or less in length may participate in the state-waters fishery and no more than 60 pots may be operated by a vessel. State-waters Pacific cod fishery vessels are not required to carry onboard fishery observers.

The state-waters GHL has been achieved every year since the inception of the fishery. From 2014 through 2018, annual state-waters fishery harvest averaged 26.6 million pounds of Pacific cod (Table 13-4). Vessel effort ranged between 14 and 32 boats. Exvessel value averaged \$8.3 million annually since inception of the fishery. State-waters seasons generally open early February and the fishery was open on average for 49 days since 2014. Estimated daily harvest averaged 900,000 pounds during the 2018 season. At the 2018 estimated daily catch rate, the season would have been extended by approximately 18 days assuming a GHL of 44.3 million pounds based in the proposed ABC allocation.

During the 2014 and 2015 seasons, the DHS was defined as state-waters of the Bering Sea between 164°W long and 167°W long. In 2015, the board expanded the DHS to include most state-waters of the Bering Sea between 164°W long and 170°W long (Figure 13-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department is opposed to establishing harvest levels that may result in foregone harvest.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 13-1.–Bering Sea Subarea Pacific cod ABC apportionment and proposed state-waters allocations for comparison, in pounds, by year, 2016–2018.

Year	BS ABC	93.4% BS Federal TAC	6.4% DHS state-waters GHl	Proposed 10% DHS state-waters GHl
2016	562,173,000	526,193,928	35,979,072	56,217,300
2017	526,899,400	493,177,838	33,721,562	52,689,940
2018	443,124,600	414,764,626	28,359,974	44,312,460

Table 13-2.–Bering Sea–Aleutian Islands federal Pacific cod harvesting sectors and TAC allocations, 2018.

BSAI federal Pacific cod harvesting sectors	2018 TAC allocations (%)	2018 TAC (pounds)
Bering Sea CDQ	NA	44,380,803
Aleutian Islands CDQ	NA	3,701,523
Longline catcher processor	48.7%	194,719,090
Longline catcher vessel ≥60 ft LOA	0.2%	800,270
Pot catcher processor	1.5%	5,996,512
Pot catcher vessel ≥60 ft LOA	8.4%	33,587,081
Longline or pot catcher vessel <60 ft LOA	2.0%	7,996,084
Trawl catcher vessel	22.1%	88,684,444
AFA trawl catcher processor	2.3%	9,228,456
Amendment 80 trawl catcher processor	13.4%	53,772,399
Jig	1.4%	5,617,321
Total	100.0%	448,483,983

Table 13-3.–Dutch Harbor Subdistrict Pacific cod harvest during state-waters and parallel fisheries, in pounds, as a percent of the ABC, by year, all gear combined, 2014–2018.

Year	Bering Sea ABC (pounds)	State-waters (GHl)			Parallel (TAC)			State-waters and parallel		
		Vessels	Harvest (pounds)	Percent of ABC	Vessels	Harvest (pounds)	Percent of ABC	Vessels	Harvest (pounds)	Percent of ABC
2014	562,173,000	16	17,666,510	3.1%	15	6,577,217	1.2%	26	24,243,727	4.3%
2015	562,173,000	14	17,636,103	3.1%	30	7,094,032	1.3%	38	24,730,135	4.4%
2016	562,173,000	24	35,519,920	6.3%	24	6,517,493	1.2%	37	42,037,412	7.5%
2017	526,899,400	24	33,247,414	6.3%	18	5,482,427	1.0%	33	38,729,842	7.4%
2018	443,124,600	32	29,055,603	6.6%	14	5,249,466	1.2%	38	34,305,069	7.7%
Avg.	531,308,600	22	26,625,110	5.0%	20	6,184,127	1.2%	34	32,809,237	6.2%

Table 13-4.—Dutch Harbor Subdistrict state-waters Pacific cod effort, GHL, harvest, and exvessel value, by year, 2014–2018.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	Price per pound	Exvessel value
2014	16	205	17,863,874	17,666,510	\$0.28	\$5,006,797
2015	14	183	18,029,404	17,636,103	\$0.27	\$4,763,751
2016	24	421	35,979,072	35,519,920	\$0.28	\$9,846,051
2017	24	349	33,721,562	33,247,414	\$0.30	\$10,067,240
2018	32	286	28,360,000	29,055,603	\$0.41	\$11,817,047
Avg.	22	289	26,790,782	26,625,110	\$0.31	\$8,300,177

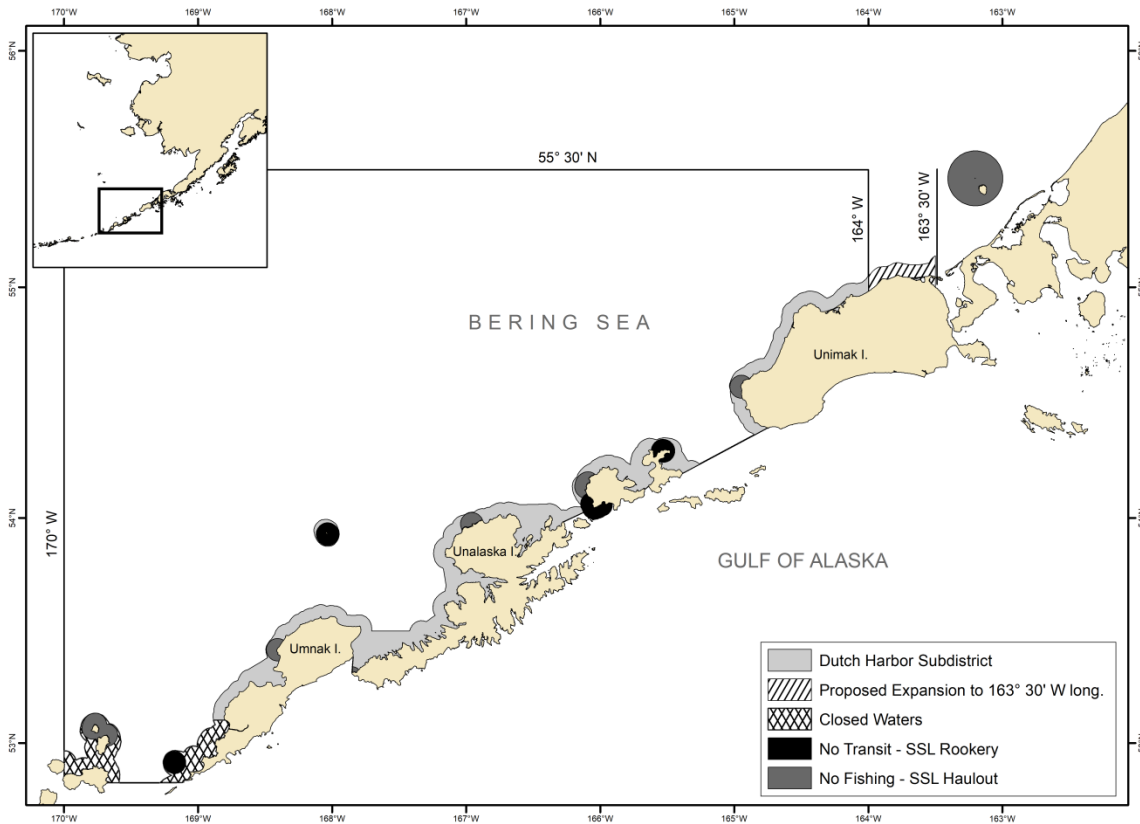


Figure 13-1.—Map of current and proposed areas open to fishing during the Dutch Harbor Subdistrict state-waters Pacific cod fishery.

PROPOSAL 14 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Ernie Weiss.

WHAT WOULD THE PROPOSAL DO? Increase DHS state-waters Pacific cod fishery GHL allocation from 6.4% to 8% of the federal Bering Sea subarea Pacific cod ABC. This proposal would also expand the geographical extent of the DHS by shifting the eastern boundary from 164°W long to 162°30' W long (Figure 14-1).

WHAT ARE THE CURRENT REGULATIONS? The DHS state-waters Pacific cod fishery GHL is based on 6.4% of the federal Bering Sea Subarea Pacific cod ABC. The subdistrict is defined as state-waters of the Bering Sea east of 170°W long, west of 164°W long, south of 55°30' N lat, and north of 53°06.11' N lat (Figure 14-1).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? An 8% allocation of federal Bering Sea ABC for the state-waters fishery would increase harvest opportunity for vessels eligible to participate in the state-waters fishery (Table 14-1). This could draw additional effort to the fishery and initially provide for longer state-waters seasons. Increasing the GHL allocation by an additional 1.6% of the federal Bering Sea subarea Pacific cod ABC would result in a corresponding decrease in federal Pacific cod TAC during most years. A redistribution of federal TAC could result in lower harvests, shorter seasons, and increased competition among vessels that have historically participated in the Bering Sea Subarea federal/parallel Pacific cod fisheries.

The current timing of the DHS season generally corresponds with Pacific cod spawn timing in the Bering Sea. The effects concentrating removals inside state-waters of the DHS on the overall productivity of the stock are unknown. Extending season lengths beyond the spawning period could additionally result lower product recovery for processors.

The Gulf of Alaska Pacific cod stock is managed independent of the Bering Sea and Aleutian Islands stocks. The southern boundary of the DHS corresponds with the northern boundary of the Western Gulf of Alaska Management Area. A higher GHL may increase unintended harvest of Gulf of Alaska Pacific cod when fishing effort occurs near the boundary line.

Extending the eastern boundary line to 162°30' W long may allow vessels to more widely distribute effort and harvest during the DHS state-waters Pacific cod fishery. It is unknown if expanding the fishing area will influence harvest rates or the number of vessels that elect to participate in the state-waters fishery. Vessels with traditional markets in the Gulf of Alaska (False Pass, King Cove, Sand Point) may have improved access to the fishery due to shorter transit times from the Bering Sea to the Gulf of Alaska through False Pass. Nominal fishing effort and harvest currently occurs in the proposed area during federal/parallel Pacific cod pot gear fisheries.

BACKGROUND: In 2013, the board adopted a state-waters Pacific cod management plan for the DHS and the first state-waters season occurred in 2014. The initial GHL for the DHS was based on 3% of the combined federal Bering Sea Subarea and Aleutian Islands Subarea ABC. In 2014, the NPFMC adopted separate Pacific cod ABCs for the Bering Sea and Aleutian Islands

subareas in response to genetic differences across the 2 stocks and address concerns about declining Aleutian Islands Pacific cod abundance. In 2015, the board modified the DHS Pacific cod management plan in accordance with the federal action to ensure the DHS GHL was based exclusively on the Bering Sea Subarea ABC. At the time of this action the board additionally increased the ABC contribution to the state-waters fishery resulting in a GHL allocation of 6.4% of the Bering Sea Subarea ABC which effectively doubled the GHL relative to the initial allocation first set in 2014.

The federal/parallel BSAI Pacific cod TAC is subdivided across 11 harvesting sectors. Since 1999, each federal/parallel harvesting sector has received a separate allocation of Pacific cod TAC (Table 14-2). Any increase in the state-waters GHL proportionally reduces the federal TAC available to the federal harvesting sectors. The federal/parallel Pacific cod fisheries are divided into A and B seasons. A seasons open for most harvesting sectors on January 1 while B seasons open September 1 for most harvesting sectors.

From 2014 through 2018, harvest of Pacific cod during the parallel fishery averaged 6.2 million pounds which accounts for 1.2% of the total Bering Sea Subarea Pacific cod ABC (Table 14-3). During that time, the total harvest from state waters (state-waters and parallel catch combined) averaged 6.2% of the total Bering Sea Subarea Pacific cod ABC (Table 14-3).

The DHS state-waters season opens 7 days after closure of the federal BSAI season for longline and pot gear catcher vessels less than 60 feet in length. Only pot gear vessels 58 feet or less in length may participate in the state-waters fishery and no more than 60 pots may be operated by a vessel. State-waters Pacific cod fishery vessels are not required to carry onboard fishery observers.

The state-waters GHL has been achieved every year since the inception of the fishery. From 2014 through 2018, annual state-waters fishery harvest averaged 26.6 million pounds of Pacific cod (Table 14-4). Vessel effort ranged between 14 and 32 boats. Exvessel value averaged \$8.3 million annually since inception of the fishery. State-waters seasons generally open early February and the fishery was open on average for 49 days since 2014. Estimated daily harvest averaged 900,000 pounds during the 2018 season. At the 2018 rate, the season would have been extended by approximately 8 additional days assuming a GHL of 35.4 million pounds based on the proposed ABC allocation.

During the 2014 and 2015 seasons, the DHS was defined as state-waters of the Bering Sea between 164°W long and 167°W long. In 2015, the board expanded the DHS to include most state-waters of the Bering Sea between 164°W long and 170°W long (Figure 14-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department is opposed to establishing harvest levels that may result in foregone harvest.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 14-1.–Bering Sea Subarea Pacific cod ABC apportionment and proposed state-waters allocations for comparison, in pounds, by year, 2016–2018.

Year	BS ABC	93.4% BS Federal TAC	6.4% DHS state-waters GHl	Proposed 8% DHS state-waters GHl
2016	562,173,000	526,193,928	35,979,072	44,973,840
2017	526,899,400	493,177,838	33,721,562	42,151,952
2018	443,124,600	414,764,626	28,359,974	35,449,968

Table 14-2.–Bering Sea–Aleutian Islands federal Pacific cod harvesting sectors and TAC allocations, 2018.

BSAI federal Pacific cod harvesting sectors	2018 TAC allocations (%)	2018 TAC (pounds)
Bering Sea CDQ	NA	44,380,803
Aleutian Islands CDQ	NA	3,701,523
Longline catcher processor	48.7%	194,719,090
Longline catcher vessel ≥ 60 ft LOA	0.2%	800,270
Pot catcher processor	1.5%	5,996,512
Pot catcher vessel ≥ 60 ft LOA	8.4%	33,587,081
Longline or pot catcher vessel < 60 ft LOA	2.0%	7,996,084
Trawl catcher vessel	22.1%	88,684,444
AFA trawl catcher processor	2.3%	9,228,456
Amendment 80 trawl catcher processor	13.4%	53,772,399
Jig	1.4%	5,617,321
Total	100.0%	448,483,983

Table 14-3.–Dutch Harbor Subdistrict Pacific cod harvest during state-waters and parallel fisheries, in pounds, as a percent of the ABC, by year, all gear combined, 2014–2018.

Year	Bering Sea ABC (pounds)	State-waters (GHL)			Parallel (TAC)			State-waters and parallel		
		Vessels	Harvest (pounds)	Percent of ABC	Vessels	Harvest (pounds)	Percent of ABC	Vessels	Harvest (pounds)	Percent of ABC
2014	562,173,000	16	17,666,510	3.1%	15	6,577,217	1.2%	26	24,243,727	4.3%
2015	562,173,000	14	17,636,103	3.1%	30	7,094,032	1.3%	38	24,730,135	4.4%
2016	562,173,000	24	35,519,920	6.3%	24	6,517,493	1.2%	37	42,037,412	7.5%
2017	526,899,400	24	33,247,414	6.3%	18	5,482,427	1.0%	33	38,729,842	7.4%
2018	443,124,600	32	29,055,603	6.6%	14	5,249,466	1.2%	38	34,305,069	7.7%
Avg.	531,308,600	22	26,625,110	5.0%	20	6,184,127	1.2%	34	32,809,237	6.2%

Table 14-4.—Dutch Harbor Subdistrict state-waters Pacific cod effort, GHL, harvest, and exvessel value, by year, 2014–2018.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	Price per pound	Exvessel value
2014	16	205	17,863,874	17,666,510	\$0.28	\$5,006,797
2015	14	183	18,029,404	17,636,103	\$0.27	\$4,763,751
2016	24	421	35,979,072	35,519,920	\$0.28	\$9,846,051
2017	24	349	33,721,562	33,247,414	\$0.30	\$10,067,240
2018	32	286	28,360,000	29,055,603	\$0.41	\$11,817,047
Avg.	22	289	26,790,782	26,625,110	\$0.31	\$8,300,177

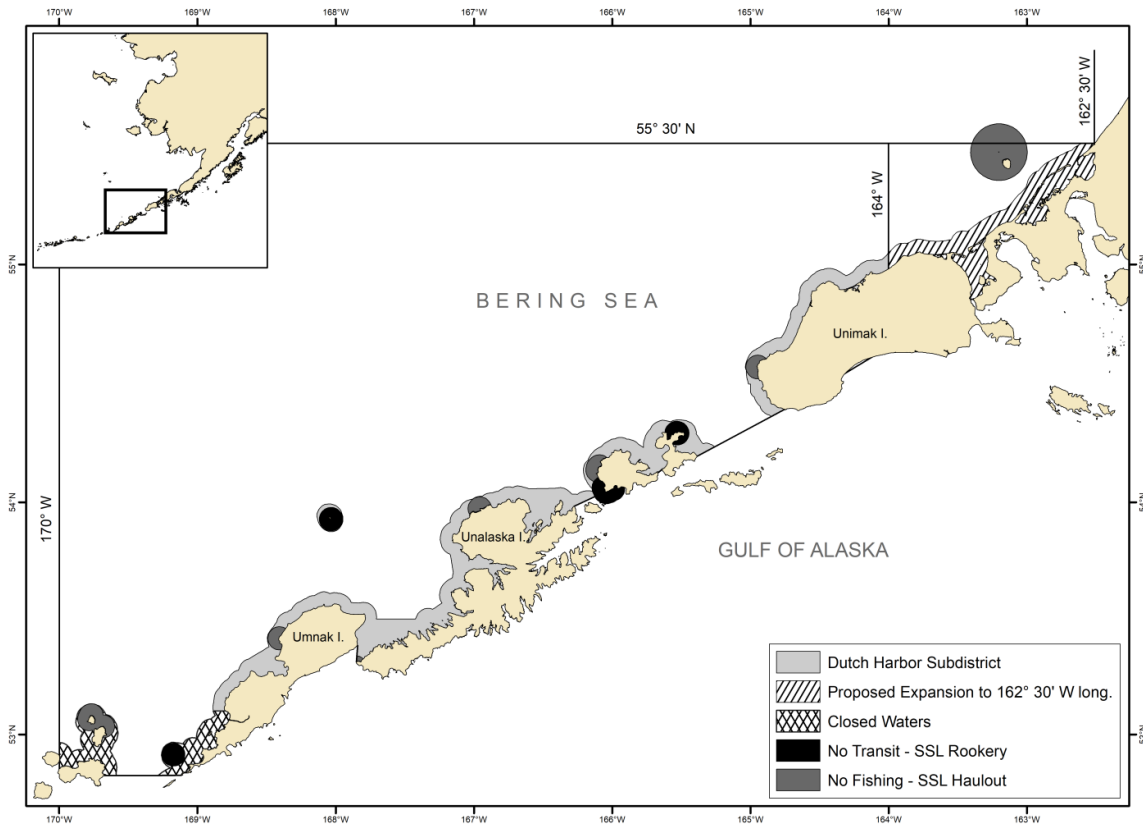


Figure 14-1.—Map of current and proposed areas open to fishing during the Dutch Harbor Subdistrict state-waters Pacific cod fishery.

PROPOSAL 15 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: Andrew Wilder.

WHAT WOULD THE PROPOSAL DO? Establish a vessel trip limit of 150,000 whole pounds of Pacific cod for the DHS state-waters Pacific cod fishery.

WHAT ARE THE CURRENT REGULATIONS? The DHS state-waters Pacific cod fishery is open to pot gear vessels 58 feet or less OAL. Vessels are restricted to operating no more than 60 pots per vessel. No regulations otherwise limit hold or harvest capacity.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? For vessels with hold capacities of 150,000 pounds or greater, restricting harvest to the specified trip limit could reduce their trip level and overall harvest potential. Reducing harvest potential for the highest capacity vessels in the fleet may reduce Pacific cod harvest rates overall and extend the season length allowing for greater opportunity for smaller sized vessels. The extent of these effects are largely unknown given fleet composition and factors that influence fishery performance vary across years.

All Pacific cod delivered in excess of the 150,000 trip limit would be deducted from the GHL and proceeds resulting from the overage would be surrendered to the state. Establishing a trip limit would increase demand on department and processor catch accounting efforts and enforcement oversight required to prosecute the fishery.

BACKGROUND: In 2013, the board adopted a state-waters Pacific cod management plan for the DHS and the first state-waters season occurred in 2014. The season opens 7 days after closure of the federal BSAI season for longline and pot gear catcher vessels less than 60 feet OAL. The GHL is based on 6.4% of the federal Bering Sea Subarea ABC and has been achieved every year since the inception of the fishery. From 2014 through 2018, an average of 22 vessels annually participated in the fishery harvesting an average of 26.6 million pounds of Pacific cod per year (Table 15-1). Exvessel value averaged \$8.3 million. The season typically opens early February and the GHL has been achieved on average in 49 days (Table 15-1).

In 2018, 32 vessels harvested a total of 29.1 million pounds in 30 days. On average, vessels harvested approximately 37,000 pounds per vessel per day. Vessel deliveries averaged 101,600 pounds per delivery throughout the season. Individual delivery volumes ranged from about 2,200 pounds to over 230,000 whole pounds. Out of a total of 286 deliveries, 24% of all offloads exceeded 150,000 pounds (Table 15-2). Fifty-three percent of all deliveries were composed of less than 100,000 pounds.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 15-1.–Dutch Harbor Subdistrict state-waters Pacific cod effort, GHL, harvest, and exvessel value, by year, 2014–2018.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	Price per pound	Exvessel value
2014	16	205	17,863,874	17,666,510	\$0.28	\$5,006,797
2015	14	183	18,029,404	17,636,103	\$0.27	\$4,763,751
2016	24	421	35,979,072	35,519,920	\$0.28	\$9,846,051
2017	24	349	33,721,562	33,247,414	\$0.30	\$10,067,240
2018	32	286	28,360,000	29,055,603	\$0.41	\$11,817,047
Avg.	22	289	26,790,782	26,625,110	\$0.31	\$8,300,177

Table 15-2.–Number of deliveries by weight during the 2018 Dutch Harbor Subdistrict state-waters Pacific cod fishery.

Whole Pounds	Number of Deliveries	Percentage of Deliveries
Less than 100,000	152	53
100,000 to 149,999	66	23
Over 150,000	68	24
Total	286	100

PROPOSAL 16 – 5 AAC 28.537. Chignik Area Pacific Cod Management Plan.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Coordinate season opening dates between Chignik Area state-waters and parallel Pacific cod fisheries.

WHAT ARE THE CURRENT REGULATIONS? The *Chignik Area Pacific Cod Management Plan* allocates 90% of the state-waters GHL to pot gear vessels and 10% of the GHL to jig gear vessels. The pot gear season opens 7 days after closure of the federal/parallel CGOA pot gear A season or March 1, whichever is later. The jig gear season opens March 15. If the jig gear GHL allocation has not been harvested by August 14, the department may reopen the season to include both pot and jig gear to promote full harvest of the GHL.

The parallel CGOA pot gear Pacific cod fishery is distributed across 2 seasons. The parallel A season open January 1 and the parallel B season opens September 1. Currently, the state-waters season closes on August 28 to allow the parallel pot gear B season to open. The state-waters season may reopen after closure of the CGOA parallel pot gear B season if any GHL remains unharvested.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Clarify regulations and establish season dates that provide maximum benefit for participants.

BACKGROUND: The Chignik Area state-waters pot gear GHL allocation is fully harvested most years. The jig gear GHL has not been fully harvested since the inception of gear-specific GHL allocations in 2000. Since the start of state-waters Pacific cod fisheries in 1997, pot vessels have capitalized on the rollover season during 7 years. Despite additional pot effort after the rollover date, the total Chignik Area state-waters Pacific cod GHL has only been achieved 3 years (2003, 2010, and 2011).

From 2000 through 2011, unharvested jig gear GHL was made available to pot gear vessels on August 15. By regulation the state-waters season remained open until the GHL was harvested or the season closed on December 31. Beginning in 2012, the board modified the *Chignik Area Pacific Cod Management Plan* to accommodate changes in management of federal Pacific cod fisheries in the Gulf of Alaska to better coordinate state and federal season dates.

To accommodate the September 1 federal/parallel B season opening date and avoid concurrent state-waters and federal pot gear fisheries, the board closed the state-waters season for pot gear on August 28 and changed the rollover season date to coincide with the closure of the federal/parallel B season. Beginning in 2014, the board again modified the management plan resulting in the current regulation that allows unharvested jig gear GHL to be harvested by pot gear vessels from August 15 through August 28 and after closure of the CGOA federal/parallel pot gear B season (Table 16-1). The August 15 opening date for the rollover season was chosen by fishery participants because it overlaps with the salmon fishery when a seasonal processor is usually operating in the Chignik Area. However, an August 15 GHL rollover followed by a state-waters season closure on August 28 results in a 2-week rollover season, which to date, has not provided adequate opportunity to harvest the remaining GHL consistent with the intent of the GHL rollover regulation.

VMS, permitting, registration, and reporting requirements differ between state-waters and parallel pot gear fisheries, as do SSL closure areas (Table 16-2; Figure 16-1). These differences may limit access for some participants depending on which fishery is open.

DEPARTMENT COMMENTS: The department submitted this proposal and supports development of regulations that are understandable, enforceable, and promote orderly fisheries. The department is **NEUTRAL** as to which fishery, state-waters or parallel, should open after August 28.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

Table 16-1.– Chignik Area Pacific cod season opening dates, by fishery, by gear.

Pacific cod season	Gear type	
	Pot	Jig
Federal/Parallel A	January 1	January 1
State-waters	March 1 or 7 days after closure of CGOA pot gear A season, whichever is later	March 15
Federal/Parallel B	September 1	June 10
State-waters rollover	August 15	August 15

Notes: CGOA = Central Gulf of Alaska.

Table 16-2.–Chignik Area Pacific cod pot gear fishery regulations, by fishery.

	State-waters fishery	Parallel fishery
Harvest quota	Guideline Harvest Level (GHL)	Total Allowable Catch (TAC)
Gear limits	60 pots ^a	None
Vessel Monitoring System (VMS)	Not required	Required
Stellar sea lion (SSL) no fishing areas ^b	One	Seven
Federal Fisheries Permit (FFP)	Not required	Not required
License Limitation Program (LLP)	Not required	Not required ^c
Observer requirements	None	None ^c
Registration requirements	Superexclusive	None

^a May be removed after August 14.

^b See Figure 16-1.

^c Unless the vessel has a Federal Fisheries Permit (FFP).

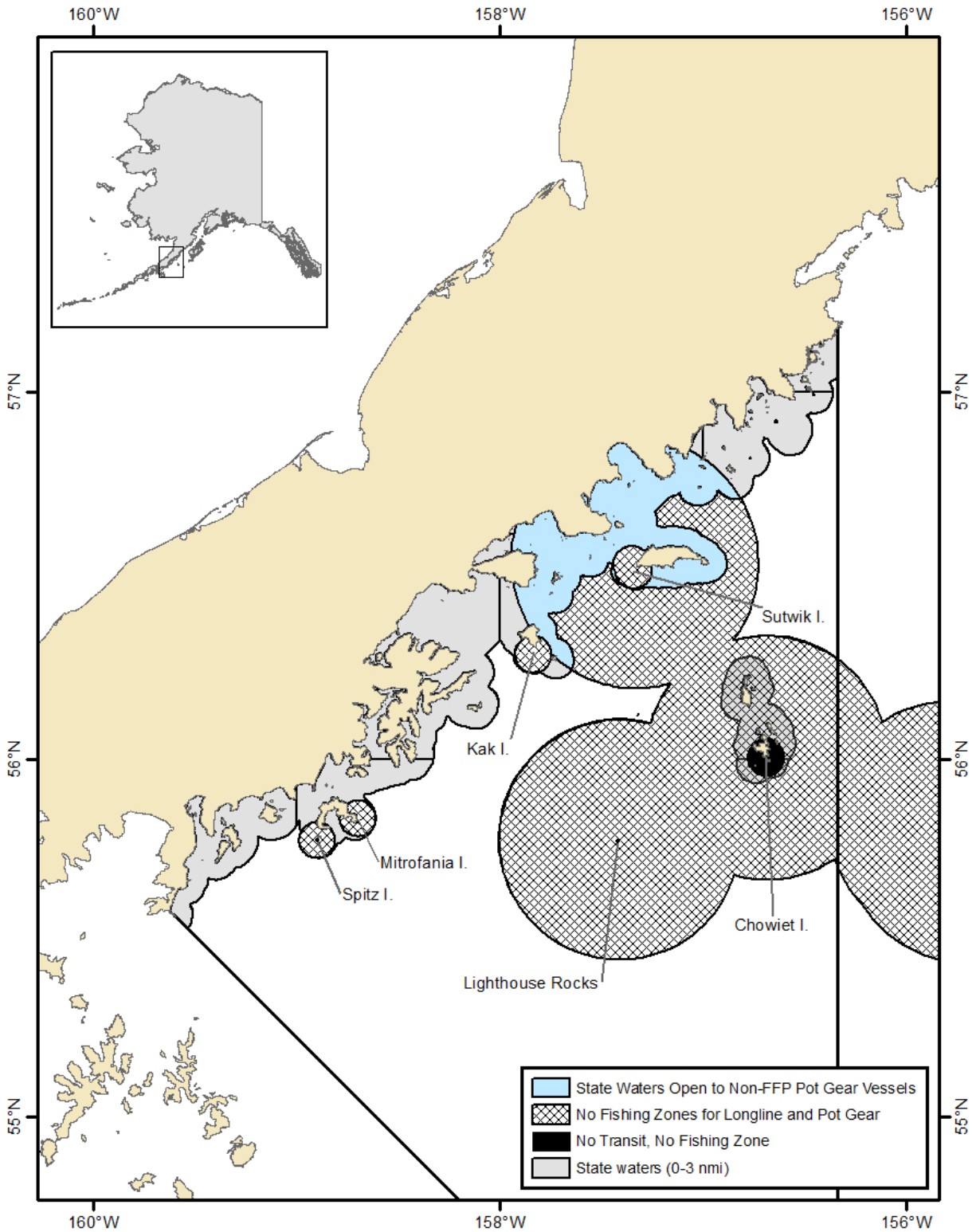


Figure 16-1.—Steller sea lion restrictions for pot gear during the parallel Pacific cod season in the Chignik Area.

PROPOSAL 17 – 5 AAC 28.577. South Alaska Peninsula Area Pacific Cod Management Plan.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Remove regulation that delays opening of the South Alaska Peninsula state-waters Pacific cod jig gear fishery based on NWS marine forecast.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula state-waters jig gear season opens 48 hours after the closure of the federal/parallel Western Gulf of Alaska (WGOA) jig gear A season. If the WGOA federal/parallel jig gear sector A season has not closed by March 15, the department may close the parallel jig gear season on or after March 15 and open the state-waters season for jig gear to facilitate harvest of the GHL.

The season opening is delayed 24 hours if the NWS marine forecast for Castle Cape to Cape Sarichef (PKZ155) issued at 4:00 a.m. on the opening day contains gale warnings for that day or the following day. If, after the initial weather delay, the following day's 4:00 a.m. forecast again contains gale warnings for that day or the following day, the opening is delayed for an additional 24 hours. Weather delays may continue on a rolling 24-hour basis for 7 days beyond the initial opening date. After 7 days, the season opens regardless of the weather forecast.

The South Alaska Peninsula Area Pacific Cod Management Plan allocates 85% of the state-waters GHL to pot gear and 15% to jig gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The South Alaska Peninsula state-waters Pacific cod jig gear fishery will open regardless of the NWS marine forecast.

BACKGROUND: Weather delay provisions are intended to improve vessel safety at the start of the season when vessels are transporting gear or traveling to the fishing grounds and may provide a more equitable start during competitive fisheries for smaller vessels less capable of operating in heavy seas.

From 1997 to 2012 the South Alaska Peninsula state-waters Pacific cod pot and jig gear seasons opened concurrently. When the weather delay provision was adopted in 2007, it was primarily directed at the pot gear fishery given that fishery is highly competitive with seasons typically lasting less than 21 days. The jig gear fishery is comparatively slow-paced and the weather delay provision does not significantly reduce competition or improve access for participants. From 2007 through 2018, the average jig gear season length was 158 days and less than 3% of all landings occurred during the first week of the fishery.

In 2012, the board modified the *South Alaska Peninsula Area Pacific Cod Management Plan* to accommodate changes in management of federal Pacific cod fisheries in the Gulf of Alaska. At that time, the opening dates for the state-waters pot gear and jig gear seasons were changed such that the seasons opened independent of one another, creating a stand-alone jig gear fishery with a weather delay provision.

Since 2012, the regulation delayed start of the South Alaska Peninsula Area Pacific cod jig gear during 5 seasons. The duration of weather delays ranged from one to 5 days. Tacking and implementing the weather delay regulation requires added staff oversight particularly during years when delays occur during weekends or holidays.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.