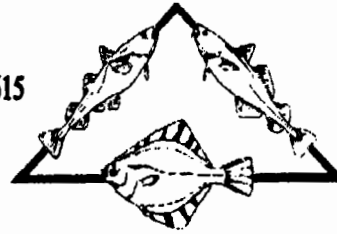


Groundfish Data Bank

Alaska

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RC 035

March 8, 2016

STATEWIDE FINFISH AND SUPPLEMENTAL ISSUES
ALASKA BOARD OF FISHERIES MEETING
ANCHORAGE, ALASKA
March 8–11, 2016

Re: Proposal 215 – prohibit trawl vessels >58 feet in length from participating in the South Alaska Peninsula management area parallel pollock fishery

Dear Chairman Kluberton and Board Members,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and catcher vessels home ported in Kodiak that participate in Alaska's groundfish trawl fisheries. Our members oppose proposal 215 that would limit the parallel pollock fishery to vessels ≤58 ft.

Some of our member vessels, both under and over 58 feet, participate in the Western Gulf of Alaska (WGOA) federal pollock fishery. We disagree with the premise of this proposal that suggests that excluding large vessels will aid in keeping bycatch to a minimum. Vessels need to fish where pollock catch per unit effort (CPUE) is high and bycatch is low. Creating a barrier at the 3 mile mark for larger vessels could very well increase Chinook salmon bycatch since they would not have the option to fish inside 3 miles when bycatch outside 3 miles was high. The WGOA pollock fleet, both small and large vessels, needs to work together to improve coordination of harvest and hot spot reporting and advance salmon excluder technology. This proposal could result in shutting down the fishery since the Chinook salmon cap of 6,684 fish for the WGOA pollock fishery is for both the parallel and federal fishing zones and once the cap is hit, the entire WGOA pollock fishery would be shut down for the year (both inside and outside 3 miles).

Briefly, these are our major points (data is included to support these points).

1. Restricting access to fishing grounds reduces options to fish in cleaner areas.
2. All the vessels need to cooperate to minimize bycatch to avoid a fishery shutdown.
3. The goal of this proposal is unclear – all it does is create more fleet divisiveness, aimed at excluding the handful of larger vessels (>58') that have participated in the fishery with a WGOA trawl endorsement. These vessels don't participate in the WGOA fishery frequently but do not want to have their fishing opportunities diminished. The same situation exists for vessels that mostly fish the WGOA. Many of these vessels have a Central Gulf trawl endorsement, do not fish often in the CGOA but don't want to have their fishing opportunities diminished for the Central Gulf fishing grounds either.
4. Both small boats and big boats have Chinook bycatch; for the time period 2013 – 2015, vessels ≤58 ft. had higher Chinook salmon bycatch rates than the >58 ft. vessels in two of the last three years (see Table 1).
5. Pollock quotas are increasing yet the Chinook cap remains static (6,684 fish), underscoring the need for all vessel size classes to work together to minimize Chinook salmon bycatch.
6. The WGOA pollock quota has not been reached in the last five years. The lowest harvest amount was 27.5% in 2013 and the highest was 90.9% in 2015. (Table 4, Figure 3, Figure 4)
7. The 2016 quota is the highest since 1985 with a total annual allocation of 56,495 mt or 124,550,007 pounds (Table 2). The highest catch amount in the WGOA from 2001 to 2015 was 67,280,172 pounds (staff comments)

suggesting that there is plenty of fish for all vessel size classes and it is going to be a challenge to catch all the quota and stay below the Chinook salmon hard cap.

8. The $\leq 58'$ fleet already takes the majority of the WGOA pollock quota (Figure 1)
9. Harvest inside vs. outside 3 miles appears to be seasonal with more catch inside 3 miles during the Spring and most of the Fall catch harvested outside 3 miles (it's all about where the fish are) (Table 3 and Figure 2).
10. Closing the parallel zone to larger vessels will only fragment the fishery since they can still fish outside three miles and catch pollock.

Chinook PSC in the WGOA pollock fishery.

- Chinook bycatch is variable, not a small boat or big boat issue. Using data from 2013-2015 (when the small vessels were required to carry observers), the bycatch rate was high for the larger vessels in 2013 (.479 Chinook/mt pollock). However, the bycatch rate for the vessels >58 ft. dropped significantly in both 2014 and 2015 while the ≤ 58 ft. vessels bycatch rates were significantly higher in comparison (Table 1).

Table 1. Chinook PSC in the WGOA pollock fishery, 2013-2015. (Source: NMFS data request).

Year	Vessel Length	Pollock (mt)	Salmon (#)	Rate	Count of Vessels
2013	≤ 58	4,298	206	0.048	17
2013	>58	2,954	1,415	0.479	9
2013 Total		7,252	1,621	0.224	26
2014	≤ 58	10,635	2,844	0.267	21
2014	>58	1,601	298	0.186	5
2014 Total		12,236	3,142	0.257	26
2015	≤ 58	26,794	3,942	0.147	17
2015	>58	1,505	178	0.118	3
2015 Total		28,299	4,120	0.146	20

WGOA Pollock harvests.

- There are 4 pollock seasons in the Gulf of Alaska (Table 2). Pollock TACs in the Western and Central Regulatory Areas of the GOA are apportioned among Statistical Areas 610, 620, and 630 based on biomass surveys and random effects models (GOA pollock SAFE). The apportionments therefore vary from year to year.

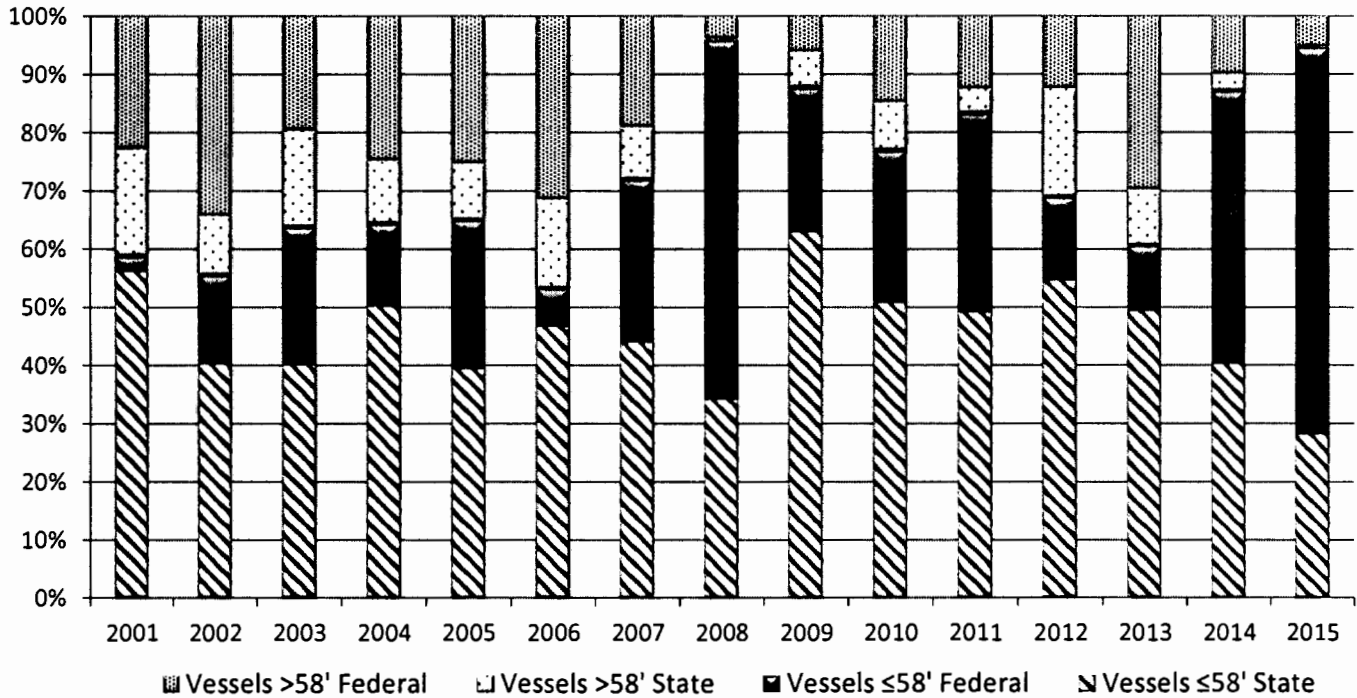
Table 2. GOA Federal pollock fishery seasonal apportionments (2016) and 2016 WGOA pollock quotas by season

Season	2016 Seasonal pollock TAC apportionments			
	610	620	630	Total
A (Jan 20 - Mar 10)	6.4%	72.7%	20.9%	100.0%
B (Mar 10 - May 31)	6.4%	85.1%	8.5%	100.0%
C (Aug 25 - Oct 1)	40.9%	25.8%	33.2%	100.0%
D (Oct 1 - Nov 1)	40.9%	25.8%	33.2%	100.0%

2016 WGOA	Season				Total
Pollock TAC's	A	B	C	D	
Metric Tons (mt)	3,827	3,826	24,421	24,421	56,495
Pounds (lbs.)	8,437,081	8,434,876	53,839,025	53,839,025	124,550,007

- Data from staff comments (WGOA pollock harvests inside and outside 3 miles by vessel size class, 2001-2015) are graphed in Figure 1 below. Clearly, most the quota is harvested by vessels ≤ 58 ft. (78% on average 2006-2015), both in state and federal waters.

Figure 1. Percent 610 pollock harvest by area (federal or State) and vessel class ($\leq 58'$, $>58'$).



- During the A/B seasons (spring or roe season), most of the pollock from Area 610 is harvested inside 3 miles. The opposite is true for the C/D seasons (fall or non-roe season). See Table 3 and Figure 2.

Table 3. Pollock harvests (mt) inside and outside 3 miles by season (Spring/Fall), 2013-2015. Data source: NMFS data request

		A/B Spring	C/D Fall	Total
2015	Federal	509	19,783	20,292
	State	1,580	6,427	8,007
	Total	2,089	26,210	28,299
2014	Federal	413	6,382	6,794
	State	3,258	2,182	5,440
	Total	3,670	8,564	12,234
2013	Federal	1,771	1,136	2,906
	State	3,875	461	4,336
	Total	5,646	1,596	7,242
Avg. 13-15	Federal	897	9,100	9,998
	State	2,904	3,023	5,928
	Total	3,802	12,123	15,925

Figure 2. 610 pollock harvest (mt) inside and outside 3 miles by season (fall/spring), 2013-2015

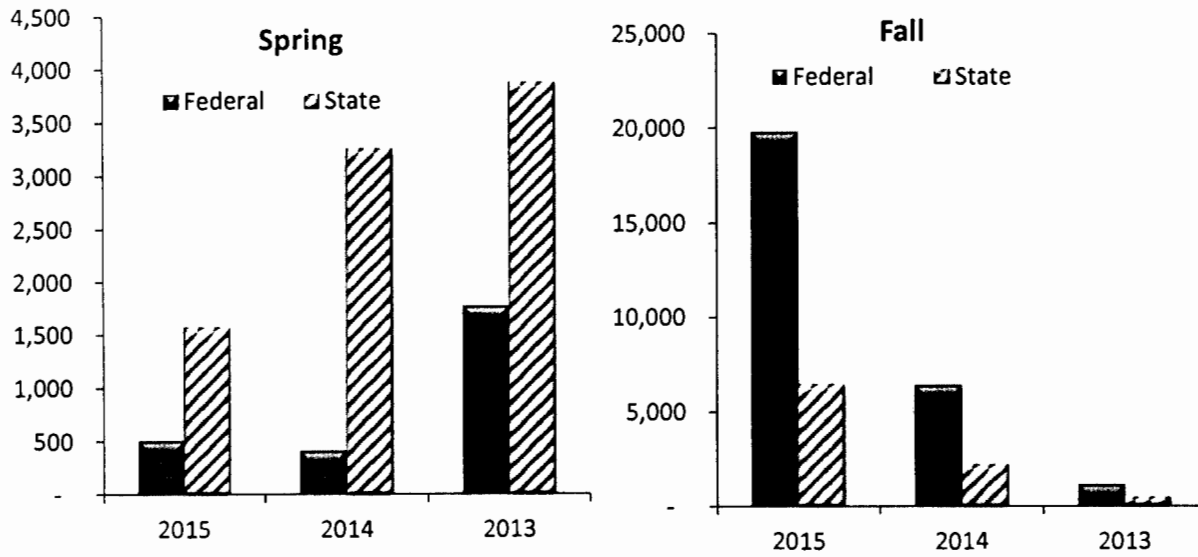


Table 4. 610 pollock TAC's and harvest by season, 2011-2015.

		Season				Total
		A	B	C	D	
2015	TAC	3,632	3,632	12,185	12,185	31,633
	Catch	125	2,369	13,945	12,300	28,739
	% Harvested	3.4%	65.2%	114.4%	100.9%	90.9%
2014	TAC	4,799	4,799	13,236	13,236	36,070
	Catch	655	3,587	7,655	1,467	13,364
	% Harvested	13.6%	74.7%	57.8%	11.1%	37.1%
2013	TAC	4,292	4,292	9,744	9,744	28,072
	Catch	935	5,166	985	624	7,710
	% Harvested	21.8%	120.4%	10.1%	6.4%	27.5%
2012	TAC	5,797	5,797	9,338	9,338	30,270
	Catch	2,754	6,444	9,339	9,355	27,892
	% Harvested	47.5%	111.2%	100.0%	100.2%	92.1%
2011	TAC	4,786	4,786	8,727	8,727	27,027
	Catch	2,699	5,819	7,174	4,902	20,594
	% Harvested	56.4%	121.6%	82.2%	56.2%	76.2%

* Catch by all gear types; specified TAC's

Figure 3. 610 (WGOA) quotas and harvests (mt) by season and annually, 2011-2015.

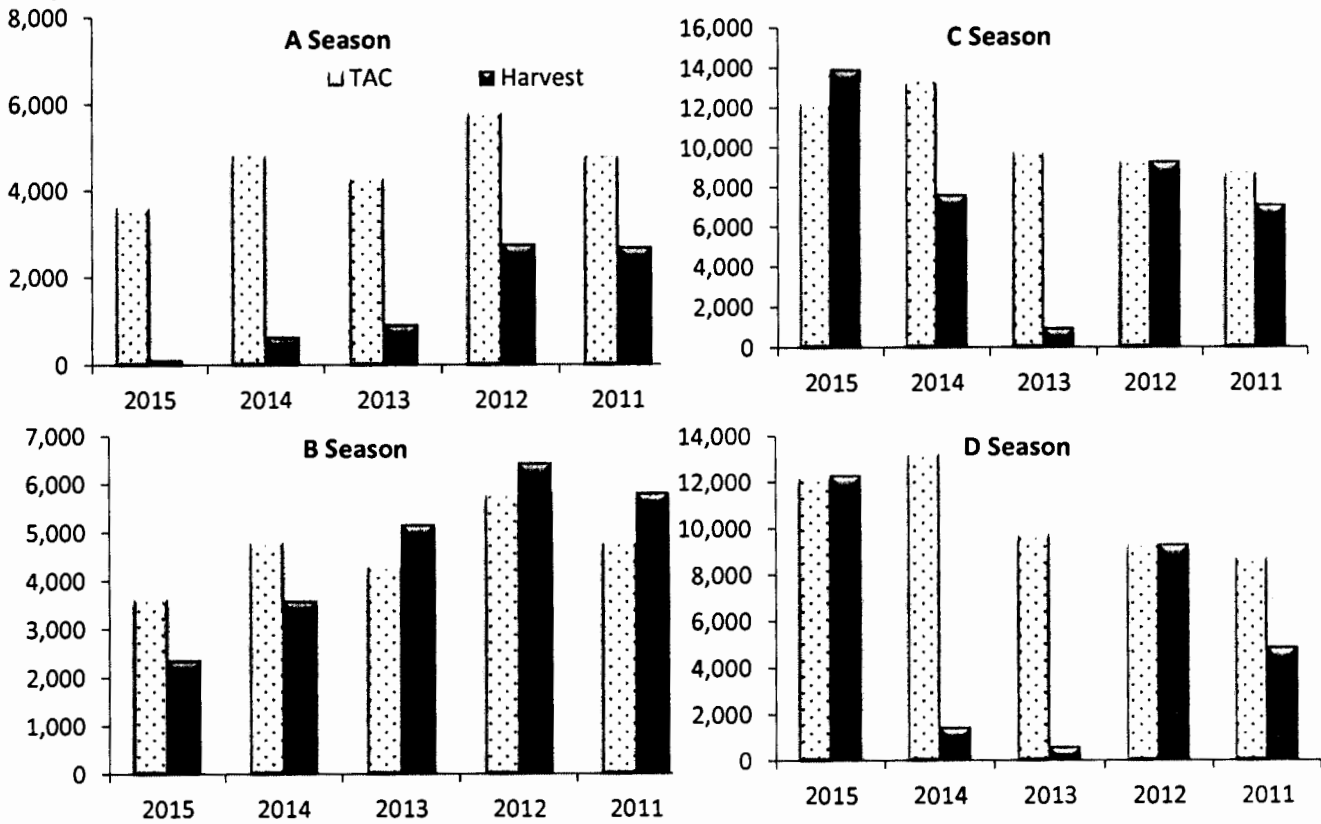


Figure 4. Annual WGOA Pollock quotas and harvest, 2011-2015

