

## Abundance-Based Harvests in the Current Process vs. Impacts of Proposed Changes

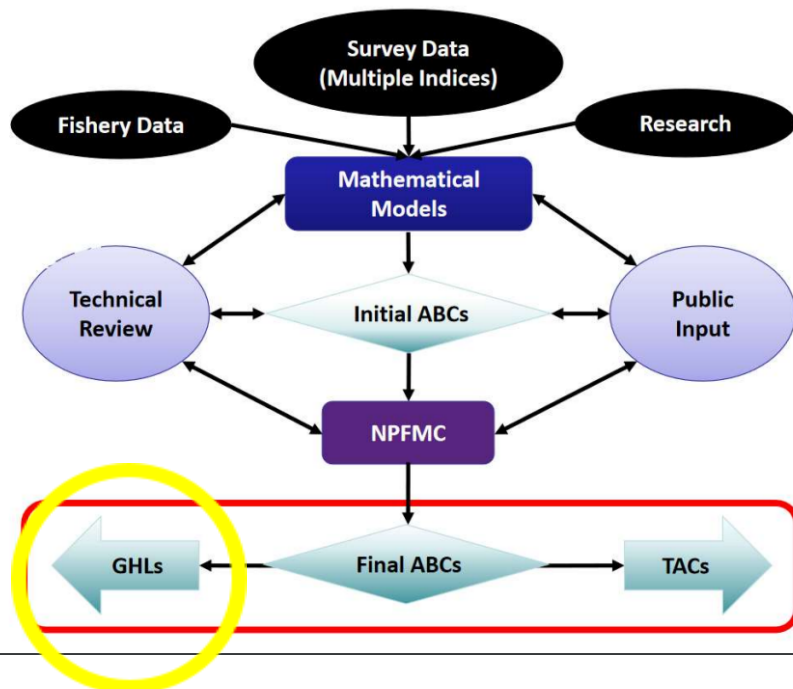
### CURRENT PROCESS

Is the current statewater cod GHL currently based on abundance? **YES**

In all statewater Pacific cod fisheries across Alaska, the GHL is set as a percentage of the Acceptable Biological Catch (ABC), based on the Pacific Cod stock assessment process. All allocations **for federal and state Pcod sectors** are set from this abundance-based process, meaning all sectors share the conservation of and benefits from the resource. GHLs across Alaska are set at varied percentages, for example:

Western Gulf = **30%** of ABC | Central Gulf = **25%** of ABC | DHS = **15%** of ABC (*implemented gradually from 2019-2026*)

### Pacific Cod Stock Assessment Process



←Source: ADFG Pacific Cod Report to Joint Protocol Committee

### What is the difference between the 1% stair-step and the annual GHL?

The 1% stair-step is the gradual implementation of an intentional allocation change determined by the Alaska Board of Fisheries. This was a **policy decision** by the State of Alaska as the independent manager of fishery resources within 3 miles of Alaska's shores. The annual GHL is **abundance-based**, and is determined by the Pacific cod stock assessment process.

## PROPOSAL 6: Amends the State's abundance-based process, to create a federal fisheries priority.

- In times of low abundance, the federal share of the resource **grows**, while the state share **shrinks**.
- In times of high abundance, the federal quota **grows** with abundance, while the state quota is **capped**, also effectively **shrinking** the state share.
- This puts additional limitations on the statewater fishery at times of **both higher and lower abundance**. Those limitations would not apply to any other Pacific cod sector. Only to the statewater fishery.
- This is different from the current process, where each sector's quota simply **rises and falls with abundance**.
- **Therefore:**
  - Prop 6 would make the statewater fishery the only Pcod sector **NOT** based on simple abundance; and
  - Prop 6 would assign the statewater fishery *alone* a **greater responsibility of conservation** at times of low abundance (by giving fish to the federal sectors to ensure that they face a lesser reduction), and at the same time **significantly restrict its ability to share in the benefits** of higher abundance.

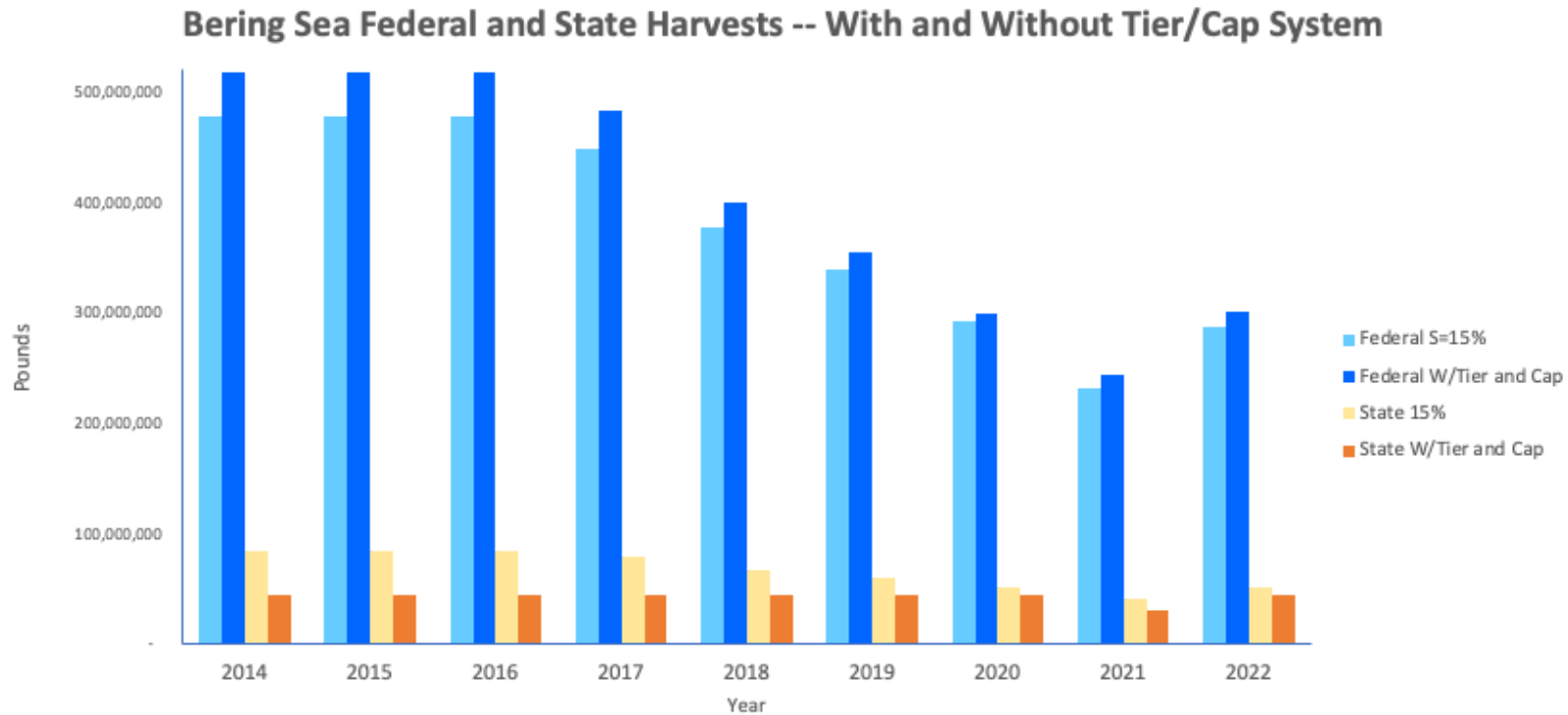
### What would the past 9 years have looked like with the 15% allocation, with the tiers, and with the tier and cap? <sup>1</sup>

Year	Bering Sea Harvest Allocation							Federal		
	ABC	State				Resulting % of GHL State Reduction from 15%		Fed: State = 15%	Fed w/Tier	Fed w/Tier and Cap
		GHL 15%	GHL Tier	Tier and Capped						
2014	562,173,000	84,325,950	73,082,490	44,092,400	8%	-7%	477,847,050	489,090,510	518,080,600	
2015	562,173,000	84,325,950	73,082,490	44,092,400	8%	-7%	477,847,050	489,090,510	518,080,600	
2016	562,173,000	84,325,950	73,082,490	44,092,400	8%	-7%	477,847,050	489,090,510	518,080,600	
2017	526,899,400	79,034,910	68,496,922	44,092,400	8%	-7%	447,864,490	458,402,478	482,807,000	
2018	443,124,600	66,468,690	57,606,198	44,092,400	10%	-5%	376,655,910	385,518,402	399,032,200	
2019	399,032,600	59,854,890	51,874,238	44,092,400	11%	-4%	339,177,710	347,158,362	354,940,200	
2020	343,637,616	51,545,642	44,672,890	44,092,400	13%	-2%	292,091,974	298,964,726	299,545,216	
2021	272,940,503	40,941,075	30,023,455	30,023,455	11%	-4%	231,999,428	242,917,048	242,917,048	
2022	338,148,162	50,722,224	43,959,261	43,959,261	13%	-2%	287,425,938	294,188,901	294,188,901	

Shaded area = DHS state GHL (**pounds**) under the tier/cap system, resulting percentage of the ABC, and the difference from 15%. This shows that the cap results in the state share shrinking considerably at times of high abundance.

See next page for graph comparing federal and state quotas under the 15% state GHL, vs. the prop 6 tier system.

<sup>1</sup> All tables and correlating chart data derived from NMFS annual harvest specifications, 2014-2022 NOAA SAFE reports.



### What do these comparisons tell us?

- Prop 6 results in the statewater share shrinking at times of both high and low abundance.
- There is a very small window between 150,000 and ~153,800 in which the state GHL would actually be 13%. At all other times of both higher and lower abundance the share would be much less, averaging 9.97%, or an average loss of 5% of the allocation as set by the Alaska Board of Fisheries.
- In every scenario this proposal would be a reversal of all previous fishery boards' intent to develop thriving, open-access statewater fisheries in the Eastern, Central and Western Gulf, Bering Sea, and Aleutian Islands. .
- Prop 6 sets a clear precedent for federal fisheries to have a harvest priority over statewater fisheries.

### If we reduce the state's allocation and create a federal priority for Pacific cod, where does that fish go?

Quota returned to the federal system would be distributed proportionally to all federal sectors. The three largest federal Pcod users are the hook and line catcher processor fleet (freezer longline), the catcher vessel trawl fleet, and the Am. 80 catcher processor trawl fleet.

- Hook and Line Catcher Processor = HAL CP = **48.7% of federal cod resource**
  - **Vessels in Fleet: 20**
- Trawl Catcher Vessel = Trawl CV = **22.1% of federal cod resource**
  - **Vessels in Fleet: 51**
- Am. 80 Trawl Catcher Processor = Am. 80 Trawl CP = **13.4% of federal cod resource**
  - **Vessels in Fleet: 19**

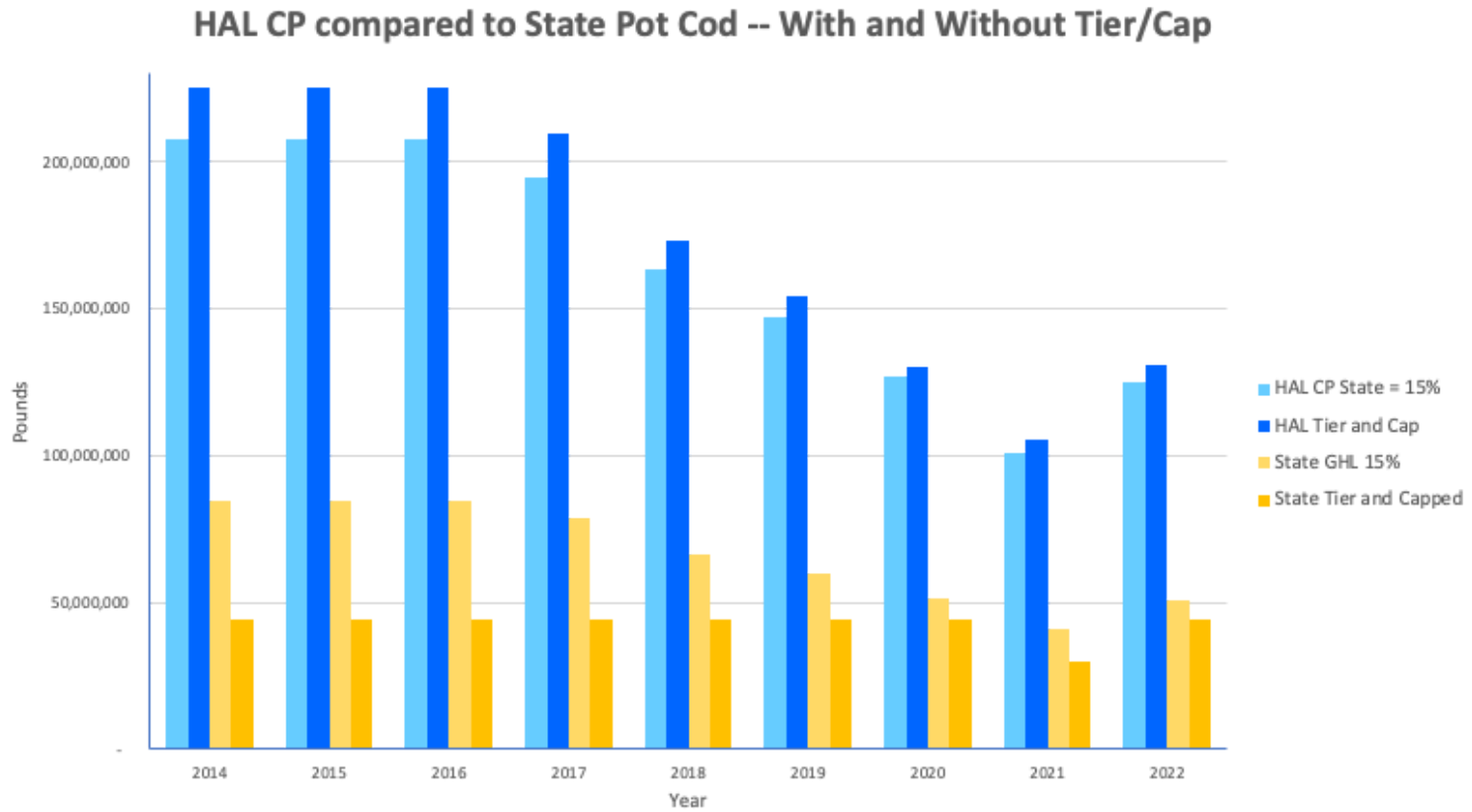
Additional allocations include the CDQ program directly (10.7%), over 60 pots (8%), and smaller allocations to the pot catcher processors, hook and line catcher vessels, under 60 pot catcher vessels, and jig vessels. The following pages show graphs comparing the three largest users to the statewater fishery, with and without the changes in Prop 6, showing the considerable gains federal sectors would receive with Prop 6. This is accompanied by impacts to Alaska's fishermen, communities, habitats, and species taken as bycatch. Examples of those impacts include:

- **Halibut Bycatch:** The top 3 users of Pacific cod (HAL CP, Trawl CV, Am. 80 Trawl CP) encounter halibut during the seasons they are targeting cod, or using pcod as bycatch in other fisheries.<sup>2</sup>
  - In 2021, those 3 sectors had a total halibut mortality of 2.52 million pounds **ONLY** during the seasons in which they were targeting or using Pcod in the Bering Sea/Aleutian Islands.
  - In 2021, ALL BSAI federal pot fisheries combined had a halibut mortality of 41,000 pounds.
- **Sea Floor Habitat:** Council reports show that 97% of all impact to habitat in the Bering Sea is from trawl gear, and 3% from fixed gear.<sup>3</sup> Some Pcod is harvested with bottom trawl gear, and some with pelagic, "midwater," trawl gear. However, recent Council discussion papers show that pelagic gear is on the sea floor 40% to 100% of the time<sup>3</sup>. Transitioning quota back to federal waters has a correlated increase in habitat impacts.

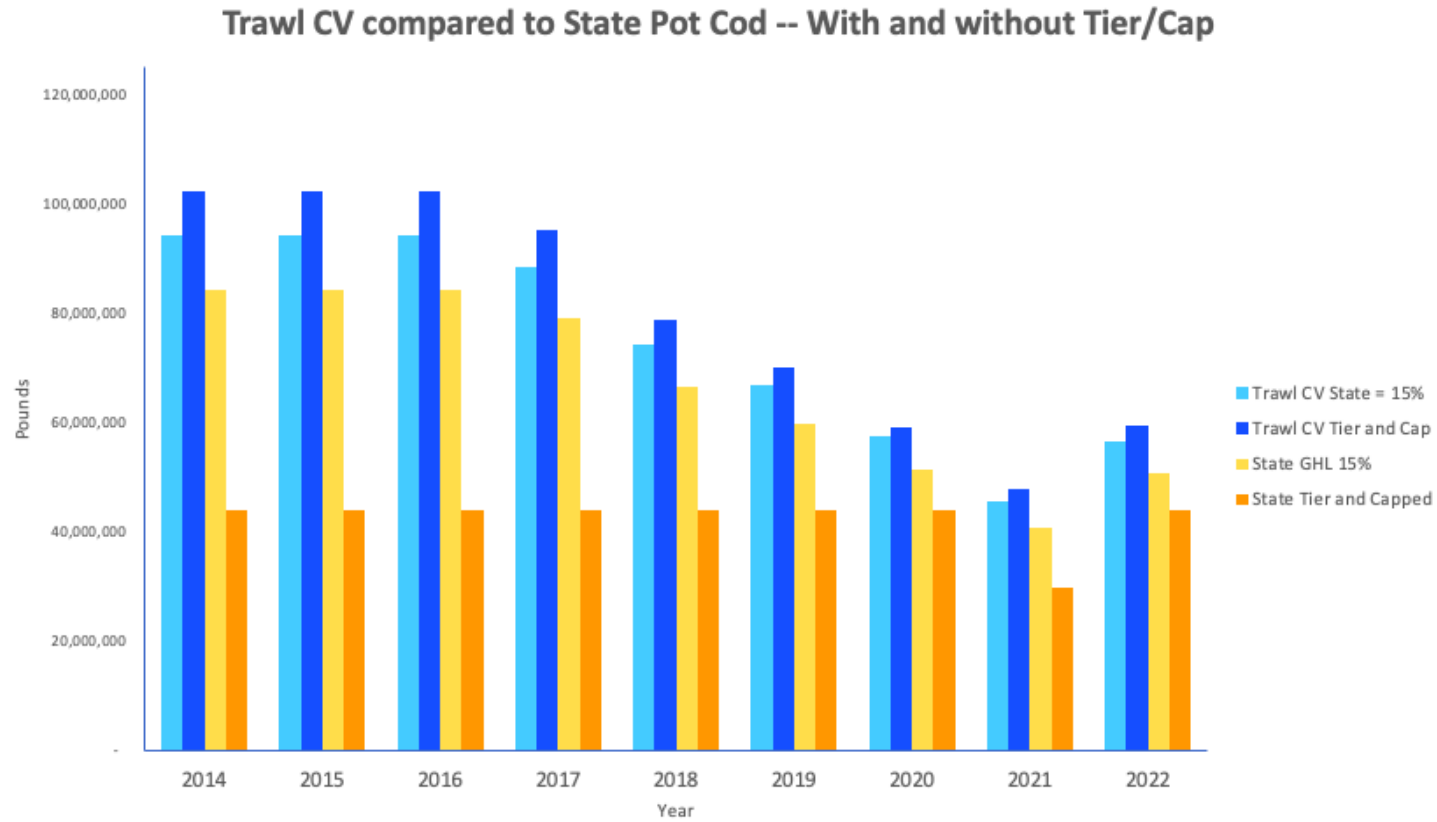
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<sup>2</sup> NMFS 2021 Report: Halibut Prohibited Species Catch by week, target, gear, sector and area

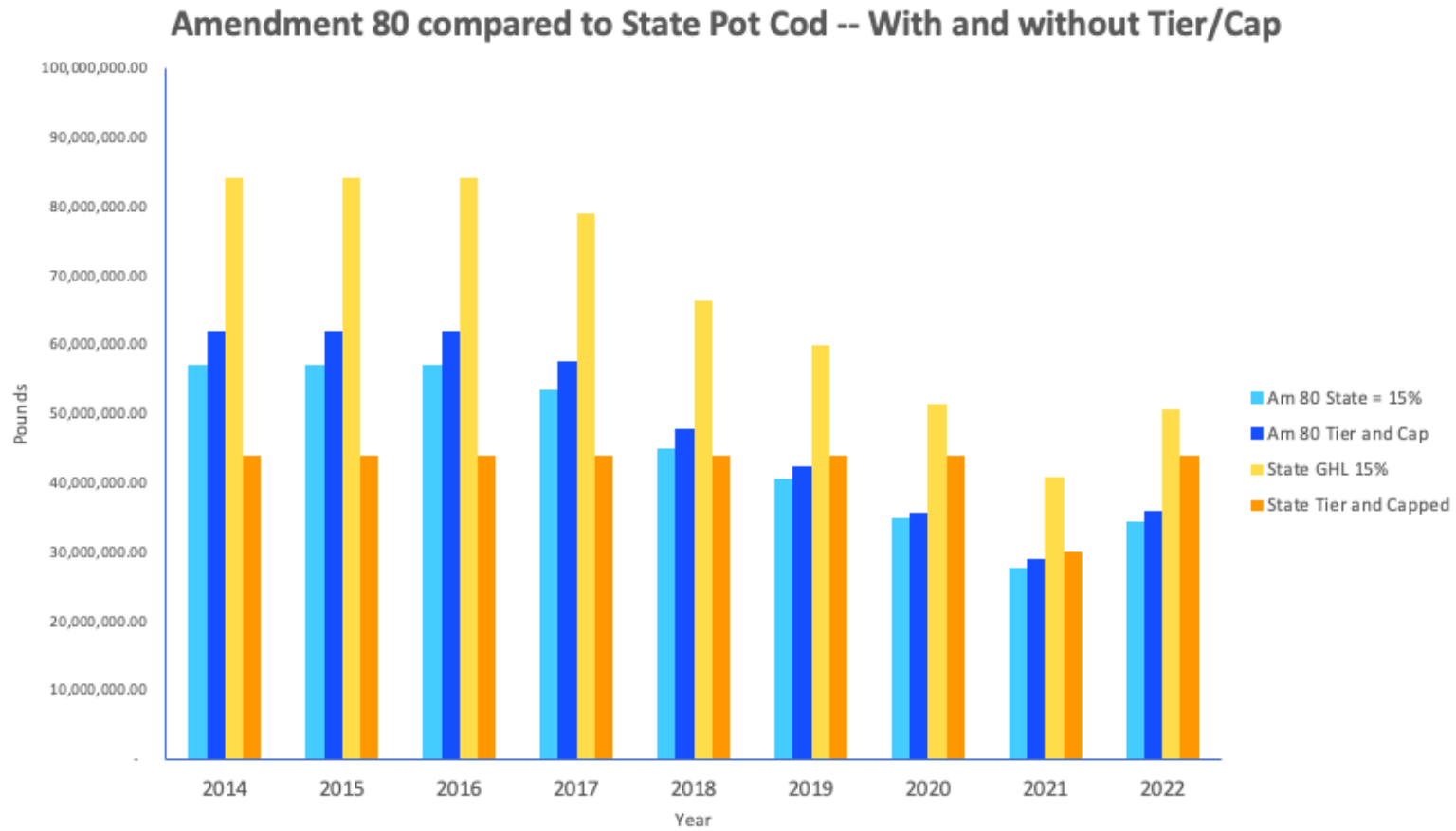
<sup>3</sup> Essential Fish Habitat Fishing Effects Discussion Paper Oct 2022 North Pacific Fishery Management Council



Hook-and-line catcher processor quota versus state water quota, comparing a 15% state allocation with the tier system in Proposal 6.



Trawl catcher vessel quota versus state water quota, comparing a 15% state allocation with the tier system.



Am 80 trawl quota versus state water quota, comparing a 15% state allocation with the tier system.