

**STAFF COMMENTS  
ON KODIAK FINFISH REGULATORY PROPOSALS**

**ALASKA BOARD OF FISHERIES MEETING  
KODIAK, ALASKA**

**JANUARY 7-10, 2014**



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The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Fisheries meeting, January 7-10, 2014 in Kodiak, Alaska and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

## ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on Kodiak Management Area finfish regulatory proposals. These comments were prepared by the department for use at the Alaska Board of Fisheries (board) meeting, January 7-10, 2014 in Kodiak, Alaska to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

Key words: Alaska Board of Fisheries, staff comments, subsistence, personal use, sport, commercial, regulatory proposals, finfish, salmon.

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**PROPOSAL 44 – 5 AAC 28.36X. Cook Inlet Area Pollock Management Plan; 5 AAC 28.46X. Kodiak Area Pollock Management Plan and 5 AAC 28.53X. Chignik Area Pollock Management Plan.**

**PROPOSED BY:** Matt Hegge.

**WHAT WOULD THE PROPOSAL DO?** This proposal would create state-waters (0–3 nautical miles; nmi) walleye pollock fisheries in the Cook Inlet, Kodiak, and Chignik areas for vessels less than or equal to 58 feet in overall length using pelagic trawl, nonpelagic trawl, seine, or jig gear. This proposal would also require 100% observer coverage for all trawl vessels, paid for by the vessel, and establish a vessel landing limit of 150,000 pounds with a time period of no less than 48 hours between landings.

**WHAT ARE THE CURRENT REGULATIONS?** Walleye pollock fisheries in the Cook Inlet, Kodiak, and Chignik areas are managed as parallel fisheries (5 AAC 28.086). During parallel fisheries, the state opens a fishery from 0–3 nmi offshore concurrent to adjacent federal walleye pollock fisheries in the exclusive economic zone (3–200 nmi) and adopts by emergency order most federal rules, including seasons, area closures, bycatch limits, and management actions.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The State of Alaska would prosecute state-waters walleye pollock fisheries in the Cook Inlet, Kodiak, and Chignik areas independently of federal walleye pollock fisheries. The guideline harvest level (GHL) would be based on 25% of the Central Gulf of Alaska (CGOA) areas 620 and 630 walleye pollock acceptable biological catch (ABC).

Developing state-waters walleye pollock fisheries would result in reduction in catch for federal/parallel participants. The proposal would reserve 25% of the CGOA walleye pollock ABCs in areas 620 and 630 for vessels 58 feet in length or less in state waters. Currently, most vessels targeting walleye pollock in the CGOA exceed 58 feet in length. Reduced harvest levels and vessel size restrictions may result in smaller harvests, shorter seasons, and increased competition among existing federal/parallel trawl participants.

This proposal would require 100% observer coverage for trawl vessels participating in the proposed state-waters fishery; however, the state does not have a groundfish observer program.

**BACKGROUND:** The North Pacific Fishery Management Council (NPFMC) is currently considering a new management program for federal Gulf of Alaska (GOA) trawl vessels (catcher vessels and catcher processors) aimed at reducing bycatch of non-target species including Pacific halibut and king salmon. This action is ongoing; in October 2013, the NPFMC proposed a preliminary program design based on a voluntary cooperative structure that would allocate pollock, Pacific cod, halibut prohibited species catch (PSC), and king salmon PSC in federal waters to cooperatives. This action is intended to solicit and focus public input prior to the NPFMC determining alternatives for a formal analysis. The initial design proposed in October includes 100% observer coverage on all trawl catcher vessels (trawl catcher processors already have at least 100% coverage). It is not possible to project when final action on such a program would occur, but it is likely at least 18 months to two years away. The NPFMC has specifically

noted that the interrelationships between state-waters, parallel, and federal fisheries management programs will be considered as trawl bycatch management measures are developed, and will necessitate coordination with the Alaska Board of Fisheries (board).

National Marine Fisheries Service (NMFS) annually establishes separate walleye pollock ABCs for areas 620 and 630 in the CGOA (Figure 44-1). The Cook Inlet, Kodiak, and Chignik areas overlap with federal CGOA areas 620 and 630, such that state waters of the Cook Inlet area are entirely within area 630; Kodiak Area state waters are within both areas 620 and a portion of 630, and state waters of the Chignik Area, mostly within area 620 (Figure 44-1). The 2012 walleye pollock ABCs in Areas 620 and 630 totaled approximately 159 million pounds (Area 620 = 101 million pounds; Area 630 = 58 million pounds). The proposed GHL for the state-waters fisheries would total approximately 40 million pounds based on 25% of the combined areas 620 and 630 pollock ABCs.

From 2003 to 2012, walleye pollock harvested during the parallel fishery in federal Area 620 averaged approximately 19% of the walleye pollock ABC; ranging from 5% in 2005 to 35% in 2004 (Table 44-1). Parallel harvest within Area 630 averaged approximately 33% of the walleye pollock ABC; ranging from 5% of the ABC in 2011, to 49% in 2005. The majority of the parallel fishery harvest occurred in the Kodiak Area (Table 44-2).

From 2003 to 2012, an average of six trawl vessels 58 feet in length or less participated in the Chignik Area parallel walleye pollock fishery and an average of two trawl vessels participated in the Kodiak Area parallel fishery (Table 44-3). In 2012 all vessels 58 feet in length participating in the Chignik and Kodiak parallel fisheries were federally permitted to fish in federal waters. Parallel harvest by trawl vessels 58 feet in length or less averaged approximately 1.5 million pounds annually in the Chignik and Kodiak areas from 2003 to 2012 (Table 44-3). No trawl vessels 58 feet in length or less have targeted walleye pollock in the Cook Inlet Area. In 2004, a single commissioner's permit was issued to a vessel greater than 58 feet to allow pelagic trawl harvest of walleye pollock in state waters of the Cook Inlet Area. Walleye pollock harvest by jig gear vessels is limited and harvest records indicate most walleye pollock is retained as bycatch during directed jig gear fisheries for Pacific cod. Seine gear is not an allowable gear type for walleye pollock; therefore, no harvest information is available.

Pacific cod are commonly harvested as bycatch or as a secondary target species during directed walleye pollock trawl fisheries. The Cook Inlet, Kodiak, and Chignik areas are currently allocated a combined 25% of the CGOA Pacific cod ABC in support of state-waters Pacific cod fisheries for vessels using pot and jig gear. If adopted, the department seeks guidance from the board regarding Pacific cod GHL allocation and catch accounting during state-waters walleye pollock fisheries. Additionally, the NPFMC recently adopted king salmon PSC bycatch caps for federal/parallel walleye pollock fisheries in the GOA, which were implemented in late 2012. The federal PSC caps are apportioned based on season, fishery target species, and gear/processing sector type. When the apportioned PSC cap is achieved, the directed fishing season is closed for the applicable federal fishing sector.

Federally-permitted pelagic trawl vessels are subject to federal observer program requirements. Annually, NMFS-certified observers are deployed across most federal groundfish and halibut fisheries based on management and conservation needs. Vessels subject to observer

requirements are placed into one of two observer coverage categories: 1) full coverage category or 2) partial coverage category. Most trawl catcher vessels in the GOA are placed into the partial coverage category, resulting in a level of observer coverage less than 100%. Funding associated with deploying federal observers on vessels in the partial coverage category is provided through annual fees based on the exvalue of groundfish and halibut retained during those fisheries.

Establishing a state groundfish observer program would be duplicative to the federal groundfish observer program for transboundary groundfish species. A state groundfish observer program would require a substantial investment in time and resources for the State of Alaska. Because NMFS provides stock assessment for most groundfish, maintaining a compatible state-waters observer program with data collected by the NMFS observer program would be essential to provide the same quality and type of information in order to be used for both catch accounting and stock assessment.

The state would need additional personnel to manage these walleye pollock fisheries. Additional personnel would be needed for management of open-access derby style fisheries, coordinating dockside sampling, reviewing and analyzing inseason and postseason harvest and bycatch data from observer program and maintaining databases of fishery performance and length/weight data.

**DEPARTMENT COMMENTS:** The department is **NEUTRAL** on this allocative proposal. However, as previously stated in proposal 43, the department is **OPPOSED** to nonpelagic trawl gear in state waters to reduce bycatch and protect habitat. The department would need funding to implement these new fisheries.

**COST ANALYSIS:** Approval of this proposal would result in an additional direct cost for a private person to participate in this fishery if fishery participants are required to pay for observers. Observer fees vary depending on the observer provider; however, observer coverage may cost vessel operators \$450 per day.

Table 44-1.—Walleye pollock acceptable biological catch (ABC) and retained harvest during parallel fisheries in federal areas 620 and 630 by year, 2003–2012.

Year	Area 620			Area 630		
	Parallel Harvest (Pounds)	620 ABC (Pounds)	Parallel Harvest as % of ABC	Parallel Harvest (Pounds)	630 ABC (Pounds)	Parallel Harvest as % of ABC
2003	7,184,392	43,397,996	17%	9,430,035	22,793,593	41%
2004	20,573,987	58,400,453	35%	11,116,438	30,952,902	36%
2005	3,698,705	75,847,837	5%	20,106,754	41,266,126	49%
2006	9,009,723	67,223,353	13%	19,209,333	40,670,878	47%
2007	6,310,075	46,252,983	14%	12,688,622	32,738,646	39%
2008	12,044,715	42,286,866	28%	10,699,750	30,071,053	36%
2009	7,770,885	31,080,770	25%	11,179,782	24,378,717	46%
2010	17,202,527	61,938,873	28%	6,509,534	42,147,975	15%
2011	9,484,954	82,375,724	12%	2,201,175	44,610,539	5%
2012	18,638,681	100,989,353	18%	9,195,678	58,087,397	16%
Average	11,191,864	60,979,421	19%	11,233,710	36,771,783	33%

Note: Harvest excludes discards at-sea.

Table 44-2.—Total retained parallel walleye pollock harvest, by all gear types, in the Cook Inlet, Chignik, and Kodiak management areas, 2003–2012.

Year	Cook Inlet		Chignik		Kodiak			
	Harvest (Pounds)	Harvest as % of Area 630 ABC	Harvest (Pounds)	Harvest as % of Area 620 ABC	Area 630 Harvest (Pounds)	Harvest as % of Area 630 ABC	Area 620 Harvest (Pounds)	Harvest as % of Area 620 ABC
2003	CF	CF	100,968	0%	9,430,014	41%	7,083,424	16%
2004	342,305	1%	1,118,569	2%	10,774,133	35%	19,455,418	33%
2005	CF	CF	857,414	1%	20,106,655	49%	2,841,291	4%
2006	CF	CF	1,186,683	2%	19,209,320	47%	7,823,040	12%
2007	1,694	0%	76,421	0%	12,686,928	39%	6,233,653	13%
2008	CF	CF	169,459	0%	10,699,664	36%	11,875,256	28%
2009	5,269	0%	CF	CF	11,174,513	46%	7,770,787	25%
2010	CF	CF	175	0%	6,509,379	15%	17,202,351	28%
2011	5,761	0%	131,221	0%	2,195,415	5%	9,353,733	11%
2012	4,301	0%	5,406,273	5%	9,191,376	16%	13,232,408	13%
Average	71,866	0%	1,005,243	1%	11,197,740	33%	10,287,136	18%

CF = Confidential data

Note: Harvest excludes discards at-sea

Table 44-3.—Parallel walleye pollock harvest by pelagic and nonpelagic trawl vessels greater than 58 feet and less than or equal to 58 feet in the Chignik and Kodiak areas, 2003–2012.

Year	Chignik				Kodiak			
	Vessels less than or Equal to 58 Feet		Vessels Greater than 58 Feet		Vessels less than or Equal to 58 Feet		Vessels Greater than 58 Feet	
	Harvest (Pounds)	Vessel Count	Harvest (Pounds)	Vessel Count	Harvest (Pounds)	Vessel Count	Harvest (Pounds)	Vessel Count
2003	CF	2	CF	1	CF	1	16,319,568	33
2004	922,546	4	CF	2	0	0	30,208,945	38
2005	429,682	4	524,984	3	CF	2	22,605,699	36
2006	642,675	3	CF	2	CF	2	26,851,128	31
2007	CF	1	0	0	0	0	18,723,343	27
2008	CF	1	0	0	CF	1	22,394,257	32
2009	0	0	0	0	CF	1	18,584,399	30
2010	0	0	0	0	1,604,716	4	22,025,932	32
2011	CF	1	CF	1	1,106,214	3	10,355,108	29
2012	4,103,067	11	CF	1	1,837,227	4	20,413,182	36
Average	1,524,493	6	524,984	1	1,516,052	2	20,848,156	32

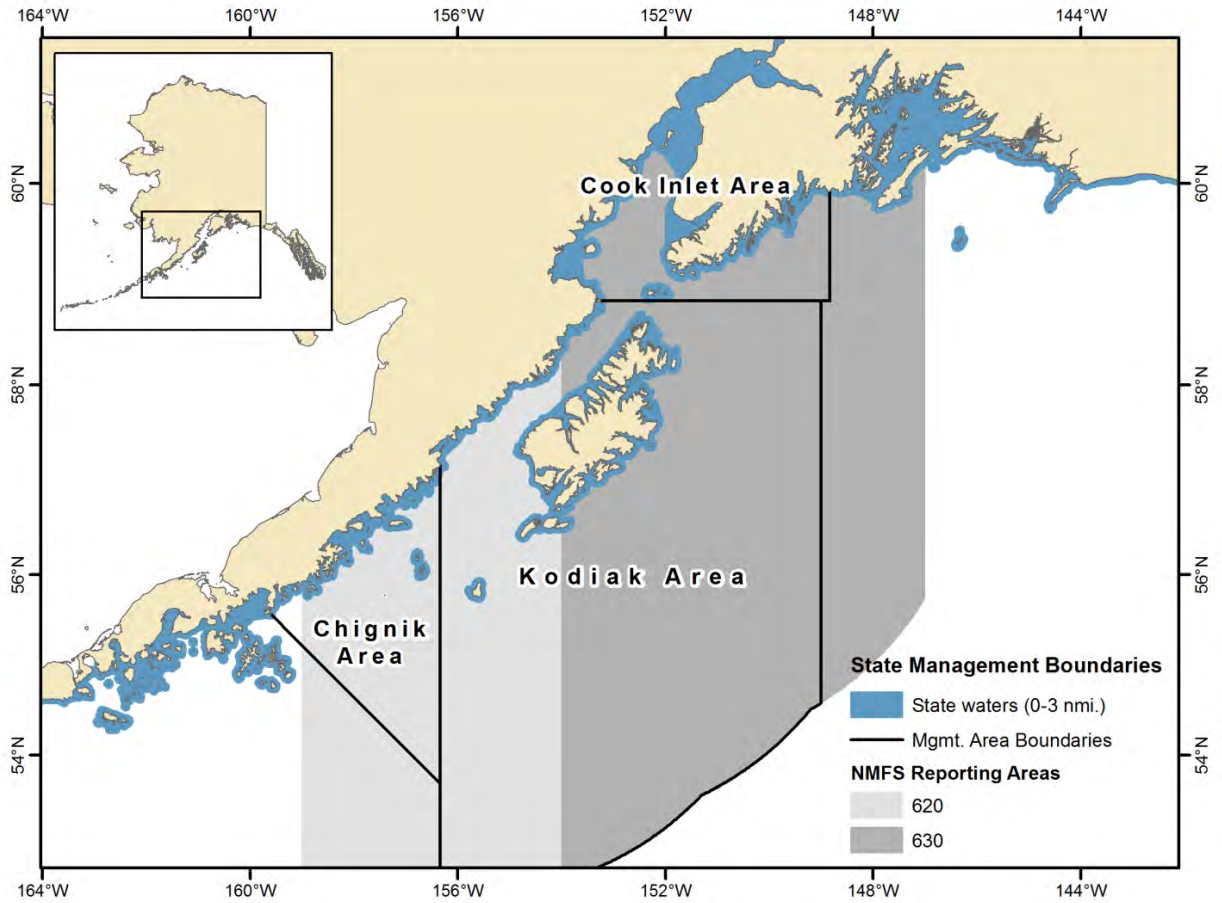


Figure 44-1.—Map depicting the Cook Inlet, Kodiak, and Chignik management areas and federal areas 620 and 630 for walleye pollock.