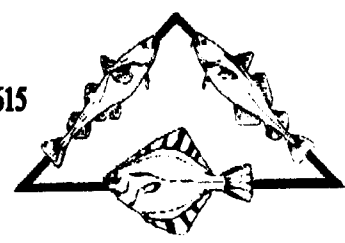


# Groundfish Data Bank

Alaska

PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

Julie Bonney, Executive Director jbonney@gci.net  
Katy McGauley, Fisheries Biologist agdb@gci.net



## Public Comment Statewide Pacific Cod

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 the Central Gulf of Alaska groundfish trawl fisheries.

**We oppose proposals 2 -5 that would increase the guideline harvest level (GHL) for the Chignik, Kodiak, and Cook Inlet Management Areas and proposals 18 – 21 that would increase the GHL for the South Alaska Peninsula Management Area.**

We oppose these proposals for the following reasons:

- The Pacific cod resource, both federal and state, are fully allocated and subscribed.
- Any reallocation of the resource between federal and state participants will not only impact individual harvesting businesses but these harvesters' business partners -- processing companies, secondary fishery businesses and coastal communities.
- Increasing Pacific cod catch within Stellar Sea Lion critical habitat (zero to three miles) will most likely require a reconsultation under the Endangered Species Act. If a jeopardy determination is found additional restrictions for federal fishing activity may result. During the 2010 reconsultation the Central Gulf of Alaska regulatory area barely escaped increased fishing restrictions similar to what occurred in the Aleutian Islands.
- There is no observer coverage, bycatch accounting or vessel monitoring systems within the State Pacific cod fisheries.
- Forcing larger amount of harvests within three miles could result in localized depletion of Pacific cod, negatively impact Pacific cod spawning habitat and result in stranded un-harvestable GHL.
- Federal participants have made substantial investments in gear and technology to harvest Pacific cod while minimizing bycatch. Any reallocation that limits access to the resource results in excessive stranded capital for these fleets.
- Catch in the parallel zone during the federal fishery and catch during the State fishery is not a reasonable proxy of cod abundance inside three miles or representative of future ability to catch cod inside three miles. This is because the parallel fishery is open during the federal fishery and those without a federal license must fish inside three miles, thus catch overtime will always

increase no matter what the GHJ is for the state fishery. The state and federal fisheries are separate and distinct seasons where non-licensed vessels must fish inside three miles during the federal fishery and for the state fisheries.

- The North Pacific Fishery Management Council (NPFMC) has passed many regulatory amendments to address bycatch (see attached flyer). The Council is now in the process of designing a "trawl bycatch management system" that will provide the necessary tools for the trawl fleets to control and reduce bycatch so that they can meet the new federal bycatch regulatory environment. This program will require coordination between the two regulatory bodies, the NPFMC for their authority from 3 to 200 miles and the Alaska Board of Fish (BOF) for their authority from 0 to 3 miles. Stability is needed for fishery participants as this new fishery management structure is under construction and designed.

There are several opportunities for participation within the federal cod fishery:

- Vessels are allowed to participate in the parallel fishery when the federal fishery is open, no federal license required. Harvest during the parallel season is deducted from the federal TAC.
- With the newly implemented federal Gulf of Alaska cod split, 6% of the federal TAC is available to jig gear participants. There are no licensing restrictions for jig gear participants or restrictions on vessel length. Presently the jig allocation is 2% in CGOA and 2.5% in WGOA.
- Rollover provisions exist within the federal fisheries where unused cod TACs by sector are available to the different catcher vessel sectors providing additional fishing opportunities.