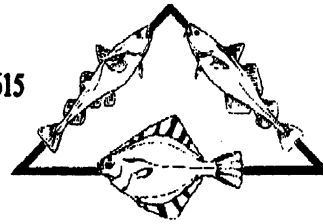


Groundfish Data Bank

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



October 16, 2018

Mr. John Jensen, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Ak 99811-5526

Re: Aleutian Islands-Bering Sea Pacific Cod Proposals

Mr. Jensen and members of the Board of Fisheries,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes shorebased processors and trawl catcher vessels home ported in Kodiak. The Kodiak trawlers are mostly family owned businesses who have participated in the federal groundfish fisheries since Americanization of the fisheries. Some of our catcher vessel members participate in the Bering Sea (BS) and Aleutian Islands (AI) trawl catcher vessel fisheries.

The members of Alaska Groundfish Data Bank oppose proposals 1, 2, 6, 9, 12, 13, and 14 and support proposals 3, and 4.

Our main opposition and concerns are with proposals 12, 13 and 14 that would increase the GHL for the Bering Sea state cod fishery (Area O, Dutch Harbor Sub District). There seems to be a misconception about how the Gulf of Alaska (GOA) state waters Pacific cod fisheries were created in 1996 and the State's objectives for these fisheries. These misconceptions are being used as leverage to advocate for an increase in the Dutch Harbor Sub District (DHS) Guideline Harvest Level (GHL).

While 25% of the federal acceptable biological catch (ABC) was set as the cap in the GOA at the time the board took action to create these state cod fisheries in 1996, it is important to note that the actual catch inside three miles at that time averaged 22.6%. At the 25% state guideline harvest level, the board anticipated a 14 – 16 percent increase in actual harvest from state waters¹. For the DHS fishery, historical cod catch within state waters was less than 1% of the BS ABC. At the current 6.4% GHL for the DHS fishery, the board has already increased inside three mile catch by about 600%. Suggesting that the DHS GHL should be increased to a similar level as the Gulf (25%) is irrational understanding the difference in ocean bottom types/topography, cod distribution, and historical catch patterns.

In 1996 the board chose to limit vessel size and utilize gear restrictions to slow harvest rates to create a year round harvest for maximum benefit to the local Gulf communities, the region and the State. The DHS fishery in 2018 was the fastest paced fishery ever, harvesting 29,055,603 pounds in 30 days (opening January 30th and closing March 1st).

¹ <http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff97169x.pdf>

Another objective was that the state management plans adopted by the Board should not substantially and adversely affect federal fishery management plans adopted by the North Pacific Fishery Management Council (NPFMC). As public comments note, many of the federal participants are extremely concerned by the prospect of an increase in the DHS GHL; as demonstrated, the various sectors and their respective management plans will experience differential impacts. As GOA federal participants we are concerned that many of the vessels that are federal participants in the BS that are economically disadvantaged may very well come to the GOA or spend more fishing time in the GOA to try to recoup lost revenue; this will disadvantage the GOA-only dependent vessels. As you know, the state of Alaska has requested a federal disaster declaration for the GOA Pacific cod fishery due to the 80% reduction of the GOA acceptable biological catch (ABC) of Pacific cod in 2018. The unusually warm waters (the warm blob) affected forage fish and cod bioenergetics which led to poor body condition and higher natural mortality. The warm water also impacted cod egg production and larval survival, greatly reducing recruitment during these years. Management of Gulf of Alaska cod is now focused on maintaining the spawning stock and increasing the likelihood that the fishery will remain viable in the future. Accordingly, catch limits for Pacific cod were set at very low amounts for 2018 and 2019. GOA dependent vessels have begrudgingly accepted the reduced quotas in an effort to maintain the stock and are already economically disadvantaged. The lower number of adult and juvenile cod will affect the population and fishery for several years to come. Best case for the GOA cod fishery is a turnaround in adult cod abundance at the earliest in 2021. Additional effort in our fisheries would be a double blow to historically dependent GOA participants.

Another objective in 1996 was to minimize bycatch to the maximum extent practicable. Crab interact with pot gear. Mortality assumed for stock assessments purposes is 50% for pots. There is no observer data in the Area O DHS cod fishery to understand the magnitude of crab bycatch. You have received public comments by both the Alaska Bering Sea Crab Association and the Bering Sea Pot Cod Cooperative regarding their concerns about crab bycatch within the DHS fishery. Until a state observer program is created there is no way to understand crab interactions with pot gear and the impact of the fishery's crab bycatch on Bering Sea crab stocks. This is especially worrisome given the recent stock declines of Bering Sea red king crab.

As the BOF did back in 1996 for the GOA state cod fisheries, the board should clearly articulate their objectives for the DHS state cod fishery so that all participants, both federal and state, can appropriately develop their individual business plans. Our members would suggest that the Board provide a written finding of their objectives and actions for the fishery so that the intent (current and future goals) is clearly understood by the public.

Another item that has not been clearly articulated are the opportunities within Alaska's federal fisheries for the subset of vessels involved in the DHS fishery. Of the 32 vessels that participated in the DHS fishery in 2018, 27 had non-trawl Federal LLPs endorsed for the BS and 15 had non-trawl LLPs endorsed for the AI. Federal regulations require that the Regional Administrator reallocate projected unharvested amounts of Pacific cod TAC from a catcher vessel sector as follows; first to the jig sector, or to the less than 60ft hook-and-line or pot catcher vessel sector, or to both of these sectors. In other words, the <60 foot sector along with the jig sector has priority over any other catcher vessel sector to receive additional federal quota. Reallocations from other Federal sectors occur throughout the year to extend the <60 foot pot cod fishery. Table 1 shows the amount of the BS cod ABC that has been harvested by <60 foot pot gear sector, both federal and state. As the table shows once the DHS fishery GHL was increased to 6.4% their combined total harvests in both 2016 and 2017 was 10.36% and 10.45% respectively, more than the federal CDQ allocation of 10.02% (remember any GHL allocation is off the top of the ABC and so all federal allocations are reduced proportionally).

Another poorly understood aspect of the <60 foot pot cod fisheries in the Bering Sea is the long duration of their cod fisheries given both the DHS fishery and the frequent reallocations of federal quota from other sectors to this sector throughout the year – on average, 2014-2018, this sector has had cod fishing opportunities for 215 days of the year, not having once closed to directed fishing in the second half of the year (Sept 1 – Dec 31) over this time period (Table 2). These ample cod fishing opportunities are in addition to any IFQ, salmon, GOA crab, tendering and GOA cod fishing opportunities.

Table 1. Bering Sea ABC caught by the <60 foot pot gear sector, 2014-2018, compared to BS CDQ allocations.

Year	< 60 ft Pot Federal Harvest	DHS State Harvest	Total	BS ABC	% Of ABC	Bering Sea CDQ	
						BS CDQ Alloc	% Of ABC
2014	10,376	8,013	18,389	255,000	7.21%	26,418	10.36%
2015	9,306	8,000	17,306	255,000	6.79%	25,680	10.07%
2016	10,319	16,112	26,431	255,000	10.36%	25,539	10.02%
2017	9,885	15,081	24,966	239,000	10.45%	23,936	10.02%
2018*	5,547	13,179	18,726	201,000	9.32%	20,131	10.02%

*thru Oct 6. Federal catch personal communication, Mary Furuness, NMFS/Catch Accounting; DHS catch from ADFG.

Table 2. BS DHS and Federal cod fishery durations, 2014-2018, for the pot cod <60 ft sector.

Year	Federal A Season			DHS State Fishery			Federal B Season			Total Days Open
	Opened	Closed	No. Days	Opened	Closed	No. Days	Opened	Closed	No. Days	
2014*	1/1/2014	2/4/2014	34	2/11/2014	5/31/2014	109	9/1/2014	12/31/2014	121	264
2015	1/1/2015	2/2/2015	32	2/9/2015	3/31/2015	50	9/1/2015	12/31/2015	121	203
2016	1/1/2016	2/5/2016	35	2/12/2016	4/22/2016	70	9/1/2016	12/31/2016	121	226
2017	1/1/2017	2/2/2017	32	2/9/2017	4/8/2017	58	9/1/2017	12/31/2017	121	211
2018	1/1/2018	1/23/2018	22	1/30/2018	3/1/2018	30	9/1/2018	12/31/2018	121	173
		Average	31			63			121	215

*2014: Closed 9/1/2014 but 99% of DHS GHL taken by end of May. For 2018, assume fishery will remain open until Dec 31 as in prior years

In closing, the majority of the <60 foot pot sector that are advocating for more cod in the DHS fishery are not small vessels with limited fishing opportunity but wide body 58 foot vessels with extensive fishing opportunities. Any addition to the state GHL will take away from CDQ groups and other federal participants with extensive historical participation and dependency on the fishery. When is enough, enough?

Thanks for the opportunity to comment. We look forward to participating in the committee of the whole process with the Board of Fish members.

Sincerely,
 Julie Bonney
 Executive Director
 Alaska Groundfish Data Bank, Inc
jbonney@gci.net