

Submitted at the request of Fritz Johnson

Proposal to modify 5 AAC 28.648 Dutch Harbor Subdistrict Pacific Cod Management Plan

Increase the DHL state waters Pacific cod fishery GHL from 6.4% to 8% of the federal Bering Sea Pacific cod acceptable biological catch (ABC).

Increase the DHL state waters Pacific cod fishery GHL to 9% of the federal Bering Sea Pacific cod ABC in years in which the federal Bering Sea Pacific cod ABC is equal to or above 200,000 mt.

Increase the DHL State waters Pacific cod fishery GHL to 10% in years in which the federal Bering Sea Pacific cod ABC is equal to or above 228,000 mt.

Overview: Create a GHL fishery that addresses conservation needs of the Pacific cod stock, particularly in periods of low abundance while balancing Alaska's economic interests in all sectors of the Pacific cod fishery, knowing that both federal and state fishery participants benefit Alaskan communities, the CDQ program, residents, processors and harvesters.

Rationale: Threshold Numbers

- Linked to ABC
 - The GHL is linked to BS Pacific cod ABC, as determined in the Federal BSAI harvest specifications process.
 - There is no change to a following year's GHL until ABC is determined for that year.

- Trigger reference points tied to ABC specifications
 - **Initial Increase:** Setting an initial 8% bump would allow immediate additional opportunities for state participants in recognition of the success and increased participation in the fishery. 7-8 percent of the ABC is already coming out of the Dutch Harbor Subdistrict (state and parallel combined)
 - **200,000 mt trigger:** This amount essentially represents the 2018 BS p-cod ABC and provides a realistic opportunity for another step up. A 9% increase at 200,000 mt would have been triggered every year in the past 8 years and represents a 11.5 million lb. increase and a 40% increase from status quo.
 - **228,000 mt trigger:** This number represents the 10-year average (2009-2018) ABC for BS Pacific cod. A 10% increase at 228,000 mt would have been triggered in 6 of the past 8 years and represents a 21.9 million lb. increase and a 70% increase from status quo.

Submitted by Angel Drobnica

- Responsive to stock status, economic interests
 - The BS Pacific cod stock is experiencing unprecedented shifts in distribution, biomass, and recruitment due to warming ocean temperatures. There is considerable uncertainty regarding the 2019 ABC and the long-term health of the stock. In 2018, for the first time since the annual trawl survey commenced in 1982, there was no cold pool formation.
 - The GHL fishery would step up to a higher percentage when ABC increases, to alleviate some of the harm to CDQ groups and other Alaskan federal participants
 - Assuming good health of the stock, the 9% and 10% numbers provide attainable thresholds to increase the GHL for the DHS fishery. Reductions in periods of lower abundance would likewise be gradual, allowing for a level of stability in the fishery.
 - The framework is capped at 10% of ABC to minimize economic impacts of reallocation between groups of Alaskans as well as concerns about concentration of harvest and unknown effects on spawning population for both the BS and GOA stocks. Capping the ABC creates more stability and certainty for both federal and state participants.

Rationale: Approach

- Common framework for Pacific cod
 - Provides a common framework for both state and federal participants.
- Balances interests of all participants
 - Provides a balance of interests, including within <60' sector – opportunity for growth and stability.
 - When the ABC increases, all users have an increased share of the cod resource – and additional opportunity is given to the <60' sector.
 - When the ABC decreases, all users have a decreased share of the resource, including the <60' sector, thus sharing the conservation burden between all cod user groups.
 - In 2015, a key argument for the BOF to increase the DHS GHL to 6.4% was the limited impact to Federal participants, due to the buffer between ABC and TAC. A framework providing for GHL to fluctuate relative to ABC is consistent with that intent:
 - In years of high abundance, cod is less constraining and GHL is increased.
 - In years of low abundance, the GHL decreases to minimize the economic impact to CDQs, Alaskan communities, and fishermen participating in the Federal fisheries.
- More responsive to shifts in resource
 - Frame-working GHL to ABC is more a precautionary and environmentally responsive approach than catch-based thresholds with no linkage to biomass or stock status.

Measures to be examined for future application in the DHS fishery

- Improved monitoring and data collection, including:
 - Port sampling for age and size composition
 - At-sea monitoring (electronic logbook and VMS)
- Trip limits

Rationale

- In public testimony, proponents of a GHL increase expressed a willingness to work with ADFG to improve monitoring and data collection in the fishery. These measures would improve our understanding of Pacific cod harvested in the DHS and help ensure a clean fishery.
- Trip limits are one tool known to curtail the race-to-fish in open-access fisheries and to facilitate more fishing opportunities for smaller vessels, while improving the economic value of the fishery.