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Alaska Groundfish Data Bank
Proposal 49
January 13, 2020

RC 93

Chairman Morisky and Members of the BOF:

Regarding Proposal 49, establishing a Kodiak state water sablefish fishery, please remember other examples that have occurred when other proposals pushed for state fishery opportunities that were untried.

Example #1: State fishery was opened for skates in Prince William Sound under a commissioner's permit.

From "PRINCE WILLIAM SOUND REGISTRATION AREA E GROUND FISH FISHERIES MANAGEMENT REPORT, 2014–2017" <https://www.adfg.alaska.gov/FedAidPDFs/FMR17-40.pdf> :

P25-26:

"A directed fishery for big (*Raja binoculata*) and longnose (*Raja rhina*) skates occurred in PWS during 2009 and 2010 following the ADF&G's receipt of a capital budget increment.... The directed skate fishery was discontinued for several reasons, including the lack of comprehensive stock assessment data, relative catch and composition of skate species, halibut bycatch in the directed skate fishery, other skate harvest opportunities, and cost of management".

"The directed skate fishery in 2009 and 2010 was managed under a commissioner's permit, described in regulation 5 AAC 28.083, which stipulated, among other things, species, season, fishing area, log sheets, catch reporting, prior notice of departure and landing, and accommodation of an ADF&G observer. In 2010, the permit also stipulated a big skate trip limit of 2,500 pounds per 2-day period to slow the pace of harvest because the GHL had been exceeded the previous year."

Example #2: Develop a state-waters Atka mackerel fishery for vessels 60 feet and under, from 170 degrees W long to 180 degrees W long, using seine gear. Harvests levels would be determined from a yet-to-be specified percentage of the federal annual biological catch limit.

Board Action in October 2013: Set aside 10% of the ABC for the WAI
Emergency Board Action in November 2013, Teleconference: The board voted 7/0 to rescind its decision to create the state waters Atka Mackerel fishery and noted commissioner's test fishery permits could provide additional information on the viability of an Atka mackerel seine fishery.

Example #3: In 2014 proposal 44 would have created a GOA pollock seine fishery and a pollock jig fishery. Instead commissioner's test fishery permits were issued versus creating a new management plan. In Kodiak, one purse seine vessel made a single trip in May and did not harvest a single pollock. Forty-six vessels were issued pollock jig permits. The total catch with jig gear was 33,000 pounds, an average of 245 pounds per vessel. In Lower Cook Inlet, a test fishery took place with the F&G observers. Two vessels participated and harvested about 32,000 pounds of pollock and 45 Chinook salmon in three

trips. The pollock caught were too small for a fillet market and only 20% were suited for the bait market. The Gulf of Alaska Pollock Workgroup Final Report can be found at:
http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/cgoapollockworkgroup/pdfs/pollock_final_report.pdf

We recommend that the Board reject proposal 49. If the Board of Fish chooses to do an exploratory fishery, explore the viability of the fishery with a commissioner's permit or set a small GHL set aside of 20,000 to 30,000 pounds with some type of at-sea monitoring to understand any increase in bycatch and discard of nontarget groundfish species such as halibut, skates, cod and dogfish sharks.