

On Time Public Comment List

Buck Laukitis PC1

Theresa Peterson PC2

Comment for Proposal 2 – Clarification of intent by the author.

Submitted By: Buck Laukitis

The purpose of proposal 2 is to require a person who fishes for directed cod in any parallel fishery in the GOA to also have an LLP for that area. This proposal does not apply to the “State Waters Cod Fishery” or for jigging in parallel waters. When the Commissioner opens a parallel fishery by EO under 5AAC28.267b, 5aac 28.367b, 5AAc 28.467b, 5AAC 28.537b, or 5AAC 28.577b, a fisherman would be required to have on board a p cod endorsed LLP for the adjacent waters to fish for p cod. These regulations are found in PWS, Cook Inlet, Kodiak, Chignik, and the Alaska Peninsula. So for example, in the Alaska Peninsula parallel waters a boat would be required to have a WG pot CV cod endorsed LLP or a WG hook and line CV cod endorsed LLP to participate. (For the most part trawling is not allowed in state waters and this proposal is not intended as an additional requirement for jiggers.) For Chignik, because it straddles two Federal areas (CG and WG) a boat would be required to have either a CG or WG cod endorsed LLP with catches subtracted from the appropriate federal TACs.

Background From the Federal Register:

B. GOA Parallel Fisheries

During the Federal Pacific cod TAC fisheries, the State creates a parallel Pacific cod fishing season by generally adopting NMFS management actions in State waters; however, trawl gear is generally not allowed within State waters of the GOA. The State has management authority for groundfish resources within State waters, and the Commissioner of the Alaska Department of Fish and Game (ADF&G) opens parallel fisheries through emergency order under the Parallel Groundfish Fishery Emergency Order Authority at 5 AAC 28.086. These emergency orders establish parallel fishing seasons that allow vessels to fish for groundfish, including Pacific cod, within State waters with the same season as the Federal seasons. In addition, the Commissioner is authorized to open or close the fisheries under emergency order to adapt to unanticipated openings or closures of the Federal fisheries. There are no limits on the proportion of the Pacific cod TAC that may be harvested in State waters.

September 20, 2011

Attention: Board of Fish Comments
Board Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK. 99811-5526

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BOARDS

Support of Proposal 3—Kodiak Area Pacific Cod Management plan

Dear Board of Fish Members,

I am writing to support the placeholder proposal 3 submitted by the Alaska Department of Fish and Game addressing the Kodiak Area Pacific Cod Management. These comments are in reference to the jig fishery only and intended to provide background on the issue. Myself and a number of other jig fishermen from Kodiak have been involved on the federal side with the North Pacific Fishery Management Council advocating for a non historical set aside for the jig fleet in the Pacific cod sector split action. The outcome of these efforts is outlined below. This proposal could serve as a place holder to facilitate efforts from our community to increase opportunity in a federal allocation to the jig fishery by maximizing the State jig GHL and federal allocation while minimizing stranded cod in both State and Federal fisheries.

In 2009, a Gulf of Alaska (GOA) pacific cod sector split action divided the cod in the Gulf to Pot, trawl, longline and jig fishers. Upon implementation, scheduled for 2012, the jig sector would receive an initial allocation from the respective Pacific cod total allowable catch (TAC), before allocations to other sectors are made. The initial allocation is 1% of the Central GOA TAC and 1.5% of the Western GOA TAC, with a stair step provision to increase by 1% if 90% of the Federal jig allocation is harvested in any given year. The jig allocation would be capped at 6% of the Central and Western GOA Pacific cod TACs. In addition, the jig allocation would be stepped down by 1% in the following year if at least 90% of the previous allocation is not harvested in a given year, but would not drop below the initial allocation.

The success of this action will depend on the timing and structure of the State jig fishery with the new federal allocation. The majority of participants in both the State GHL and the federal jig fishery are from small coastal communities in Alaska. The jig fishery is an entry level opportunity, an integral component of maintaining working waterfronts. The revenue stream that is provided to the participants is an important segment of a diversified fishing operation. Increase in participation and catch would be most likely to benefit coastal Alaska residents. In addition, increased deliveries would increase processing activity and the onshore fleet services that are found throughout coastal communities.

Upon review of the proposed federal rule and completion of the jig fishery under way now, jig fishermen will network with ADF&G Kodiak area management to chart the course for a successful outcome for this innovative initiative.

Thank you for the opportunity to provide this brief background and we look forward to a management structure which has support from the jig fleet and ADF&G Kodiak area managers while achieving the objective to increase access to federal waters for jig fishermen.

Sincerely,



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