

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C2 GOA Pollock/Cod seasonal allocations

| | NAME (Please Print) | TESTIFYING ON BEHALF OF: | Handout | PPT |
|----|--------------------------------------|--|---------|-----|
| 1 | Paul Gonboldt | Self | | |
| 2 | Beth Stewart | PFC | | |
| 3 | Julia Binning | AG-DB | X | |
| 4 | Kurt Cochran | F/V MARATHON | | |
| 5 | Rebecca Skinner Patrick O'Donnell | Alaska Whitefish Trawlers Association | | |
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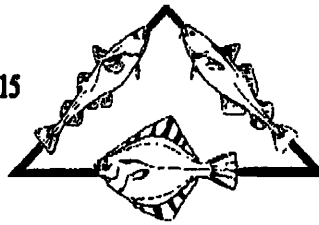
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Groundfish Data Bank

Alaska

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June 3, 2019

Simon Kinneen, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue
Anchorage, AK 99501

Agenda Item C-2 Modifications GOA pollock/cod Seasonal Allocations – Final Action

Dear Chairman Kinneen and Members of the Council,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of the Kodiak-based shorebased processors and trawl catcher vessels home ported in Kodiak that participate in the Gulf of Alaska (GOA) trawl fisheries. We would like to comment on two elements of the agenda item C-2 action.

Alternative 2, Option 1: Increase the amount of unharvested pollock that may be reallocated from one season to the following season: We do not support changing the amount of unharvested pollock that may be reallocated from one season to the following season, or among areas, from the present 20%. Intuitively, most would think increasing the rollover amount from 20% to a higher percentage (either 25% or 30%) would mean less pollock stranded annually overall for the GOA pollock fishery; in AGDB's experience that is not the case. It is important to remember that reallocation of uncaught TAC is applied first to the subsequent season for the area with the underage then any amount above that is rolled to the other two GOA areas up to the 20% for those areas (see page 19 and 20 of the analysis).

The analysis provides two examples where there was stranded pollock quota since the 20% was reached in all areas. It is important to note that in both cases the offending area did not perform for the subsequent seasons either. In 2016 for area 620 only 33% (A), 37% (B) and 14% (C) of the quota was harvested while what was rolled over to the other areas above the 20% cap was harvested in the other areas. In 2013 for area 610, the other example, 10% (C) season and 6% (D) season was harvested. Here again the offending area did not perform well yet the rollover to the other areas was full harvested (See table 3-1 of the analysis).

Since this option is part of alternative 2 which would combine the A/B and C/D seasons the result is a de facto increase to roll quota to the subsequent season since the 20% is based on the combined allocation amount. The base amount would be 50% of the annual allocation across the 3 GOA areas instead of the current 25%, resulting in a doubling of the amount available to roll. Table 1 demonstrates the effect of the difference using actual quota values with 4 seasons compared to 2 (combined) seasons.

While intuitively increasing the rollover amount above the 20% sounds like more pollock harvest in reality increasing the rollover percentage above the 20% could actually result in less pollock harvest in the offending area since the excess is not pushed out to the other regulatory areas. We do not support increasing the rollover amount above the present 20%.

Table 1. Effect of 20% maximum rollover based on 4 pollock seasons versus 2 pollock seasons (2012 top portion of the table; 2017 bottom portion of the table).

| Year-2012 | 610 | 620 | 630 | Total | |
|-------------------|---------------|---------------|---------------|----------------|------------------|
| A Season | 5,797 | 14,023 | 5,787 | 25,607 | |
| B Season | 5,797 | 17,221 | 2,589 | 25,607 | |
| A/B total | 11,594 | 31,244 | 8,376 | 51,214 | |
| C Season | 9,338 | 7,282 | 8,986 | 25,606 | |
| D Season | 9,338 | 7,282 | 8,986 | 25,606 | |
| C/D total | 18,676 | 14,564 | 17,972 | 51,212 | |
| 2012 Total | 30,270 | 45,808 | 26,348 | 102,426 | |
| Max 20% rollover | 1,868 | 1,456 | 1,797 | 5,121 | Status Quo |
| Max 20% rollover | 3,735 | 2,913 | 3,594 | 10,242 | Combined Seasons |

| Year-2017 | 610 | 620 | 630 | Total | |
|-------------------|---------------|---------------|---------------|----------------|------------------|
| A Season | 2,232 | 34,549 | 11,014 | 47,795 | |
| B Season | 2,232 | 39,420 | 6,143 | 47,795 | |
| A/B total | 4,464 | 73,969 | 17,157 | 95,590 | |
| C Season | 19,569 | 12,341 | 15,886 | 47,796 | |
| D Season | 19,569 | 12,341 | 15,886 | 47,796 | |
| C/D total | 39,138 | 24,682 | 31,772 | 95,592 | |
| 2017 Total | 43,602 | 98,651 | 48,929 | 191,182 | |
| Max 20% rollover | 3,914 | 2,468 | 3,177 | 9,559 | Status Quo |
| Max 20% rollover | 7,828 | 4,936 | 6,354 | 19,118 | Combined Seasons |

Alternative 3. Modify the Western and Central Gulf of Alaska Pacific cod allocation for trawl catcher vessels: AGDB supports option 3 that would increase the A season allocation for the trawl catcher vessel sector by a 15% change in relation to the status quo in both the WGOA and CGOA.

The CGOA trawl CV sector is currently allocated 21.1% of the CGOA A season TAC and 20.5% of the CGOA B season TAC. Those two figures are at a 51%:49% ratio to each other. The WGOA trawl CV sector is allocated 27.7% of the WGOA A season TAC and 10.7% of the WGOA B season TAC, which results in a 72%:28% seasonal ratio.

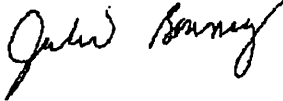
The GOA trawl CVs only directed fish for B season Pacific cod in the Central GOA. The Western GOA trawl CVs sector B season on the other hand largely goes unharvested except for catch incidental to their C/D season pollock trawl fishery. In the Central GOA, where the trawl CV fishery is prosecuted, TAC utilization in the B season lags A season utilization by a significant margin in percentage terms. Table 3-3 shows that Central GOA B season TAC utilization was typically below 50% and began to fall precipitously in the years leading up to the 2018 reduction in ABC. GOA cod do not tend to aggregate in the fall in a manner that lends itself to efficient harvest with trawl gear. Additionally, moving CGOA trawl effort from the B season to the A season would be expected to reduce incidence of halibut PSC in the CGOA.

Increasing the CGOA and WGOA CV cod A season allocation hopefully will make this fishery more attractive for those trawl harvesters to participate in with the appropriately endorsed LLPs. A better fishing opportunity in the GOA cod fishery may very well reduce effort in other fisheries across the NP such as the GOA pollock fisheries, the state Dutch

Harbor area O cod fishery, the state AI cod fishery as well as the BSAI CV trawl fishery which these vessels may be able to participate in. For these reason we support the maximum A season allocation (option3) for Alternative 3.

We appreciate the Council efforts to try to improve the GOA trawl fisheries under the current management structure and hope that you will prioritize a GOA catch share program which would be, hands down, the best mechanism to improve prosecution of these fisheries. Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie Bonney".

Julie Bonney
Executive Director
Alaska Groundfish Data Bank