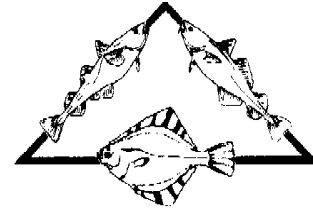


Alaska Groundfish Data Bank



P.O. Box 788 Kodiak, AK 99615 (907) 486-3033
Julie Bonney, Executive Director jbonney@alaskagroundfish.org
Chelsae Radell, Assistant Director cradell@alaskagroundfish.org
Shelby Bacus, Science Advisor sbacus@alaskagroundfish.org

March 28, 2025

North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, Alaska 99501-2252

Re: D3: CGOA Rockfish Program Review

Dear Chairwoman Drobnica and Members of the Council,

Alaska Groundfish Data Bank, Inc (AGDB) is a member organization representing Gulf of Alaska (GOA) shorebased trawl vessels, mostly homeported in Kodiak and shorebased processors that operate in the GOA. Our vessel and processor members are engaged in the shoreside sector of the Central GOA Rockfish Program (RP). Chelsae Radell, Assistant Director of AGDB, is the Cooperative Manager for the four shoreside RP cooperatives and the Inter-cooperative Manager. This letter is on behalf of the four RP cooperatives and their processing partners.

The Magnuson Stevens Act (MSA) requires LAPPs to be reviewed every 7 years and the last RP review occurred in 2017. We appreciate the analysts detailed work on the 2025 review, which concludes that the RP is functioning as intended. The program has provided benefits for all sectors to varying degrees and based on information available, has increased net benefits to the Nation. The one weakness revealed in the Review is the decline in both ex-vessel and wholesale fish prices, which was initially triggered by the COVID-19 pandemic, the strong US dollar, tariffs, and higher inventory levels. These factors have negatively impacted many commercial fisheries in Alaska and the broader U.S.

As the analysis points out, the RP or any other catch share program structure cannot address all broader national and global economic issues, but the structure of the RP has helped to mitigate some of these issues at least in part by increasing efficiency and fishing flexibility. 2024 was an especially challenging year in the CGOA and in the RP; the program structure allowed cooperative members whose associated processor wasn't purchasing rockfish to deliver to other markets and also allowed the fleet to quickly pivot back to rockfish due to an early pollock closure. The changes to the RP processing cap, recently implemented under Amendment 113 to the GOA Fishery Management Plan (FMP), were essential in allowing the RP to function more efficiently with last year's uncertainty. The Cooperatives do not have any recommendations for changes to the RP structure at this time, but we do have related requests.

Monitoring

Given the challenges noted in the Review with both the cost and availability of observers for the RP, we continue to move forward with our NFWF-funded Rockfish EM project. After collecting test data in 2022, we will be in our third pilot year in 2025 and plan to submit an Exempted Fishing Permit (EFP) for the 2026 fishing year. Developing an EM program for Rockfish CVs is a priority outlined in the Alaska Region's 2021-2025 Electronic Technologies Implementation Plan. Furthermore, the pelagic Pacific ocean perch target is nearly identical to pelagic pollock Trawl EM, which we are using as a foundation for Rockfish EM. However, including both pelagic gear and non-pelagic gear in the Rockfish EM program is essential for the program's success; vessels consistently deploy both pelagic and non-pelagic gear on RP trips in order to maximize efficiency.

Creating an EM program that includes non-pelagic gear and halibut accounting is also important for building further monitoring programs in other fisheries, as there would be benefits for flatfish and cod fisheries. We request the Council move expeditiously to stand up an EM program for the RP, but only if it includes both pelagic and non-pelagic gear.

Additionally, we support NMFS's recommendation to remove the CMCP specialist requirement from the regulations since Rockfish EM will include a shoreside monitoring component and the CMCP specialist will no longer be necessary.

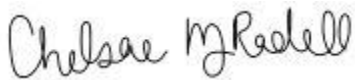
Rockfish QS Use Cap

The Cooperatives also ask that the Council clarify how NMFS Restricted Access Management (RAM) should regulate the Rockfish QS Use cap at 50 CFR 679.82(a)(2). We appreciate the analyst's inclusion of the existing issue with NMFS' present interpretation in the Review (pg 77-78). In 2024, we had a cooperative that could not harvest additional Pacific ocean perch because we simply could not *transfer* any additional CQ into the cooperative due to this cap, despite that none of the vessels were at or near their 8% vessel *harvest* cap. Although this cap is called the "*use*" cap, the regulation states that "A person may not individually or collectively ***hold or use*** more than..." We believe the intention of this regulation was to limit how much a person can *hold* or own, and support that interpretation, while the vessel use cap at 50 CFR 679.82(a)(4), is intended to control how much any vessel can harvest or *use* since it is a vessel harvesting the quota, not a person.

NMFS' current interpretation that primary rockfish quota counts towards this cap whether or not the quota is actually *used* by that person directly conflicts with the harvest cap by restricting primary rockfish harvest at 4% rather than at the 8% harvest cap. Since the collective part of the definition also impacts the entire cooperative, it can prevent a member from leasing and transferring additional quota, if a fellow member has already leased and transferred a significant amount of primary rockfish quota in, creating an unfair balance between cooperative members. The end result is that it disincentivizes small cooperatives due to a restriction on how much that cooperative could ever transfer into harvest, despite not being at their vessel harvest caps. Council clarification on how the Rockfish QS use cap should be interpreted could help solve this issue.

We appreciate the work that has gone into this Review. Thank you for the opportunity to comment.

Sincerely,



Chelsae Radell
Assistant Director, Alaska Groundfish Data Bank
RP Shoreside Cooperatives Manager
RP Shoreside Intercooperative Manager