

March 28, 2025

North Pacific Fishery Management Council
1007 West 3rd Ave, Suite 400
Anchorage, AK 99501

RE: D3- Central GOA Rockfish Program Review

Dear Madam Chair and Members of the Council,

Thank you for the opportunity to comment on the Central GOA Rockfish Program Review on behalf of the Gulf of Alaska Best Use Cooperative (BUC). BUC represents all offshore participants in the Central Gulf of Alaska Rockfish Program (CGOA RP) with 11 qualified CGOA RP LLPs and 7 non-pelagic trawl catcher processor vessels as current members. The CGOA RP is meeting the stated goals and objectives of the program in the offshore sector and BUC is not recommending any changes at this time.

We would like to thank staff for a comprehensive and well-written Program Review document. The document outlines the CGOA RP's success in providing improved safety at sea, controlling fleet capacity, enhancing NMFS' ability to conserve and manage species allocated under the program, increasing vessel accountability, reducing sea floor contact, and allowing full retention of allocated species.

The offshore sector receives quota shares (QS) for three primary rockfish species – Pacific ocean perch, Northern rockfish, and Dusky rockfish – and for four secondary species – Sablefish, Shortraker rockfish, Rougheye rockfish, and Thornyhead rockfish. Each cooperative also receives a quota share of Halibut PSC mortality. The Program Review document shows that the CP sector harvests the majority of both primary and secondary species allocations and all quota share species are fully retained under this program. The CGOA RP and the cooperative structure allow greater spatial and temporal flexibility in prosecuting the offshore fishery. The result is lower bycatch, a more rational distribution of effort, and better market stability for the offshore sector.

The document also walks through the history of Central Gulf of Alaska rockfish fishery management, which highlights the Council's continued commitment to the success of the CGOA RP in its iterative forms. From the original structure of the Rockfish Pilot Program in Amendment 68 to the GOA FMP, to the Rockfish Program in Amendment 88 to the GOA FMP, the reauthorization of the Rockfish Program through Amendment 111 to the GOA FMP, and finally, the regulatory changes under Amendment 113 to the GOA FMP. With each iteration, the program is more responsive to the complex dynamics of the fishery and the fishery stakeholders. Noting that the adjustments to the CGOA RP under Amendment 113 were implemented in September 2024 and have not been in place for a rockfish fishery season yet, at this time GOA BUC is not recommending any additional changes to the program.

The CGOA rockfish fishery is of critical importance to the offshore sector, and we thank the Council for your consideration of these comments and your continued commitment to this cooperative based catch share program.

Sincerely,

Annika Saltman

Annika Saltman

President, Gulf of Alaska Best Use Cooperative