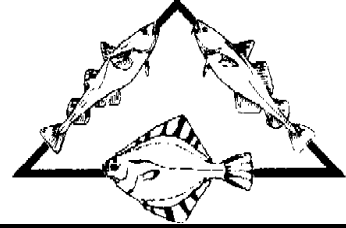


Alaska Groundfish Data Bank

P.O. Box 788 Kodiak AK 99615
Julie Bonney, Executive Director
Chelsae Radell, Assistant to the ED

(907) 486-3033
jbonney@gci.net
agdb@gci.net



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

E-1 Staff Tasking: Proposed Regulatory changes to the Central GOA Rockfish Program (RP)

Dear Chairman Kinneen and Members of the Council,

Alaska Groundfish Data Bank, Inc (AGDB) is a member organization representing Gulf of Alaska (GOA) shoreside trawlers and shoreside processors that participate in the Central Gulf of Alaska (CGOA) Rockfish Program. AGDB is also the Rockfish Co-op manager for all of the shoreside Rockfish Cooperatives (six coops in 2021) and the intercooperative manager. Since 2007, the Rockfish Pilot Program (RPP) and the Rockfish Program (RP) have brought significant benefits to the fishery in terms of conservation, fish quality and stability for participants. The program has increased vessel accountability, reduced waste and discards, controlled fleet capacity, improved safety, reduced halibut bycatch and provided controls for Chinook salmon bycatch.

In February of 2021, the Council recommended and NMFS authorized an emergency rule (ER) to open the rockfish fishery one month earlier in 2021 (April 1 versus May 1). Fishery participants requested the ER because there was no shoreside market for flatfish and potential covid impacts. The earlier start date was successful. Now participants would like to make the April 1st opening date permanent and would note that both the lack of a flatfish market and concerns regarding covid persist. We are asking that the Council initiate an amendment at this time to accomplish this change.

In addition, we would like to see three modest changes to the program to make it more functional, and to help ensure we don't forego TAC of these species from being landed in Kodiak. The changes and justification are as follows below:

- 1) Change the 8% vessel harvest cap for all primary rockfish in aggregate – Pacific Ocean Perch (POP), Northern Rockfish (NR), Dusky Rockfish – to capping only POP catch at 8%.
- 2) Increase the processing caps (currently 30% for primary rockfish, 30% for sablefish, and 30% for cod); analyzing a range of 35 to 40%.
- 3) Remove the cooperative quota share (QS) holding cap.

Change the vessel harvest cap to 8% of the CV POP quota. The only species to which the cap is relevant is POP; the TACs are not fully taken in the other species to which the aggregate cap applies. This change may help in more fully prosecuting these fisheries by the CV fleet and bring more landings across Kodiak’s docks. Table 1 shows the amount of quota left in the water by the CV sector in 2019 – 2021 for the three primary rockfish species. NR ranged from 65-75%, Dusky ranged from 27 – 59%, and POP ranged from 1-4% of quota remaining in those years. Table 2 shows the vessels that were within 200,000 pounds of the harvesting cap and the percentage of their catch for each primary rockfish species during that same timeframe. The vessels that approach the harvest cap primarily catch POP so maintaining the 8% cap for POP will still restrict behavior while simultaneously allowing vessels to harvest more northern and dusky rockfish, which are traditionally more difficult to catch. Annually, 25-28 vessels actively fish, and only 1-3 vessels approach the harvesting cap each year.

Table 1. POP, Northern, and Dusky quota remaining in 2019-2021 (in pounds).

Year	Species	Catch	Quota	Quota Remaining	% Remaining
2019	POP	10,849	10,954	104	1.0%
2020	POP	12,232	12,570	338	2.7%
2021	POP	14,602	15,154	552	3.6%
2019	NR	649	1,835	1,186	64.6%
2020	NR	444	1,722	1,277	74.2%
2021	NR	457	1815	1,358	74.8%
2019	Dusky	1,145	1,567	422	26.9%
2020	Dusky	889	1,523	634	41.6%
2021	Dusky	1,079	2,645	1,567	59.2%

Table 2. Vessels within 200,000 pounds of the 8% rockfish harvesting cap in 2019-21.

Year	Vessel	POP	NR	Dusky	Sum RF	Harvest Cap	Diff from Harvest cap	% POP	% NR	% Dusky
2019	Vessel 1	1,783,998	150,660	364,092	2,298,750	2,375,718	76,968	77.6%	6.6%	15.8%
2019	Vessel 2	1,031,921	545,203	682,532	2,259,656	2,375,718	116,062	45.7%	24.1%	30.2%
2019	Vessel 3	1,498,579	331,521	344,781	2,174,881	2,375,718	200,837	68.9%	15.2%	15.9%
2020	Vessel 1	1,545,938	613,801	574,518	2,734,257	2,789,213	54,956	56.5%	22.4%	21.0%
2021	Vessel 4	2,768,697	285,912	360,340	3,414,949	3,459,487	44,538	81.1%	8.4%	10.6%
2021	Vessel 1	2,696,892	264,259	408,373	3,369,524	3,459,487	89,963	80.0%	7.8%	12.1%
2021	Vessel 5	3,336,691	2,704	12,986	3,352,381	3,459,487	107,106	99.5%	0.1%	0.4%

Increase the processing cap to 35% to 40% of CV primary rockfish, sablefish and cod quota (the current cap is 30% for these species / species groupings). This change is necessary for all quota to be able to be landed. Table 3 shows the amount of the three limited species/species group processed in 2013 and 2014 when 7 processors were active in the fishery compared to 2021 when only 4 Kodiak processors remained active. With the loss of 3 processors on the waterfront, it is becoming increasingly difficult to get quota processed without exceeding the existing caps; harvesters need this change. The season ends November 15, and if a processor shuts down for the season early for any reason, as one processor did in 2021, it puts further constraints on the ability to process the remaining quota. When the 30% number was selected, there was no grandfather provision included to reflect historical processing activity above the cap. Now the processing caps are limiting every year.

Table 3. Percentage of species and species grouping processed by processing entity, 2013-2014, 2021

Year	Pounds Harvested			% by Processor		
	RF	Sable	Cod	RF	Sable	Cod
2013 Total	19,444,337	813,808	1,079,812	100%	100%	100%
<i>Processor</i>	415,516	18,492	3,474	2.1%	2.3%	0.3%
<i>Processor</i>	2,723,029	105,925	141,975	14.0%	13.0%	13.1%
<i>Processor</i>	582,331	40,359	384	3.0%	5.0%	0.0%
<i>Processor</i>	4,478,367	180,196	335,516	23.0%	22.1%	31.1%
<i>Processor</i>	2,820,964	136,193	298,602	14.5%	16.7%	27.7%
<i>Processor</i>	3,250,365	98,753	149,623	16.7%	12.1%	13.9%
<i>Processor</i>	5,173,765	233,890	150,237	26.6%	28.7%	13.9%
2014 Total	22,267,594	703,542	3,015,958	100%	100%	100%
<i>Processor</i>	3,616,531	99,920	720,310	16.2%	14.2%	23.9%
<i>Processor</i>	3,093,110	75,305	236,835	13.9%	10.7%	7.9%
<i>Processor</i>	3,688,844	134,794	474,994	16.6%	19.2%	15.7%
<i>Processor</i>	971,717	39,868	65,708	4.4%	5.7%	2.2%
<i>Processor</i>	762,354	31,876	135,623	3.4%	4.5%	4.5%
<i>Processor</i>	3,983,417	127,790	556,976	17.9%	18.2%	18.5%
<i>Processor</i>	6,151,621	193,989	825,513	27.6%	27.6%	27.4%
2021 Total	35,578,102	1,136,139	1,245,654	100%	100%	100%
<i>Processor</i>	12,857,209	278,739	507,997	36.1%	24.5%	40.8%
<i>Processor</i>	5,974,485	366,225	229,877	16.8%	32.2%	18.5%
<i>Processor</i>	6,708,955	166,256	315,539	18.9%	14.6%	25.3%
<i>Processor</i>	10,037,453	324,919	192,240	28.2%	28.6%	15.4%

Note: Processor data has been randomized for each year.


Eliminate the cooperative holding cap: Presently, there are two cooperatives associated with the same processor that continue to form separately due to the current 30% cooperative holding cap. Table 4 shows the combined quota shares of each cooperative by vessel, with brown and green representing the distinct membership of each cooperative. From an administrative and management perspective, it would be preferable to have one coop instead of two. The purpose of a cooperative cap is questionable since multiple cooperatives can associate with one processor. When the Council took final action for the BSAI CV trawl cod LAPP, which is similar to the rockfish LAPP structure, no cooperative cap was included. The BSAI CV trawl cod analysis supported that there was no real purpose for a cooperative cap because the program has both harvesting and processing caps, and processors can receive deliveries from more than one cooperative.

Table 4. Members of two coops associated with the same processor based on 2021 Quota Shares and TAC

Vessel	QS UNITS				2021 TAC - METRIC TONS			
	POP	NR	DUSKY	TOTAL	POP	NR	DUSKY	TOTAL
Ocean Storm	310,957	2,740	73,114	386,811	78.5	0.2	9.9	88.6
Rosella	680,933	288,003	597,094	1,566,030	172.0	18.8	81.1	271.9
Excalibur II	1,816,063	715,313	372,236	2,903,612	458.7	46.8	50.5	556.0
Arctic Ram	737,398	476,003	399,620	1,613,021	186.2	31.1	54.3	271.6
Marcy J	1,427,968	1,015,508	1,167,975	3,611,451	360.7	66.4	158.6	585.6
Cape Kiwanda	1,224,441	786,060	501,659	2,512,160	309.3	51.4	68.1	428.8
Pacific Ram	216,888	23,497	64,999	305,384	54.8	1.5	8.8	65.1
Traveler	1,527,812	73,997	12,709	1,614,518	385.9	4.8	1.7	392.4
Arctic Wind	3,620,616	1,907,465	1,011,048	6,539,129	914.5	124.7	137.3	1176.5
Michelle Renee	2,637,886	3,577,753	1,818,818	8,034,457	666.3	234.0	246.9	1147.2
Pacific Storm	100	100	100	300	0.0	0.0	0.0	0.0
Walter N	2,217,284	277,857	329,514	2,824,655	560.0	18.2	44.7	622.9
Elizabeth F	1,761,985	84,372	249,873	2,096,230	445.0	5.5	33.9	484.5
Collier Brothers	1,112,779	742,825	300,249	2,155,853	281.1	48.6	40.8	370.4
Hickory Wind	827,739	271,795	135,897	1,235,431	209.1	17.8	18.4	245.3
Sunset Bay	1,952,646	625,968	395,511	2,974,125	493.2	40.9	53.7	587.8
Gold Rush	2,259,085	857,086	363,764	3,479,935	570.6	56.1	49.4	676.0
Total	24,332,580	11,726,342	7,794,180	43,853,102	6145.763	766.881	1058.114	7970.758
Percentage	40.55%	42.25%	40.00%	40.89%	40.55%	42.25%	40.00%	40.64%

Our hope is that the Council can add this straightforward action to your priority list so that it can be accomplished quickly. The overall goal is to ensure that rockfish catcher vessels can continue to deliver rockfish program species in Kodiak, to maximize harvest under the TACs, and to react to the realities of the fisheries as they have changed over time.

Sincerely,



Julie Bonney
 Alaska Groundfish Data Bank, Inc.
 PO Box 788
 Kodiak AK 99615
jbonney@gci.net