

Alaska Board of Fisheries
 Alaska Department of Fish and Game
 P.O. Box 115526
 Juneau, AK 99811-5526

November 26, 2024

Re: Proposals 14, 15, 16, and 17 - PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes all shorebased processors located in Kodiak and catcher vessels home ported in Kodiak. Our members participate in the Prince William Sound (PWS) Pelagic Pollock Trawl fishery annually and the Kodiak processors and vessels have long term dependency in the state managed fishery; not only did they pioneer the fishery, but they have also participated since the inception in 1995. All three of AGDB's staff are also Kodiak residents; I've lived here for 40 years, raised my family here, and my employees have planted roots here as well. Kodiak is one of the last truly fishery dependent, year round commercial fishing towns in Alaska. AGDB mission is maintaining sustainable GOA fisheries now and into the future and keeping Kodiak as a community whole.

Our members strongly oppose proposals 14, 15, 16 and 17.

Background

The Kodiak trawl fleet are primarily family owned businesses with some third and fourth generation families that now operate the vessels. Data available from the National Oceanic and Atmospheric Administration, Alaska Fishery Science Center, show that more than 50% of the revenue generated in the Gulf of Alaska (GOA) pollock fishery is harvested by vessels that are Alaskan owned¹. The majority of crew members on these vessels are also Alaskan residents. The PWS pollock fishery is a catcher vessel only fishery; most vessels are between 80 to 90 feet in length. All vessels that participate in the State pollock fishery are federally licensed and also participate in the GOA federal pollock fishery which only allows catcher vessels.

Kodiak has more shorebased processors than any other community in Alaska. The trawl sector delivers groundfish 10 to 11 months a year which allows for year round processing within our community. Our year round processing sector supports the highest percentage of local resident processing workers of any major seafood production area in Alaska.

According to an economic report commissioned by the Kodiak Island Borough (KIB), "the seafood industry is the most significant sector in terms of earnings and employment in the borough. The analysis of fisheries and other data indicates the seafood industry generated 3,200 jobs and \$200 million in labor income in 2019. Nonetheless, Kodiak is experiencing a long-term decline in fisheries participation and income, including both wage jobs (most notably seafood processing jobs) and self employment (fishermen)."² The KIB levies a severance tax, the city levies a sales tax, and both governments benefit from the State of Alaska Fishery Business Tax. Tax revenue data for 2023 shows fish severance tax revenue for all fish landings in the KIB generated \$1.5 million and State Fishery Business Tax generated

¹ Alaska Fishery Science Economic Staff (Nov 2024), Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska and Bering Sea/Aleutian Islands Area: Economic Status of the Groundfish Fisheries off Alaska, 2023, page 45.

² McDowell Group (2021). Kodiak Economic Profile and Pandemic Impact Analysis. Prepared for Kodiak Island Borough.

\$1.35 million³. These revenues directly benefit borough services. Similar tax amounts from the State Fishery Business Tax and sales tax are available to support city services.

Alaska’s seafood industry continues to be in crisis statewide and Kodiak’s fisheries are no exception. The industry continues to be under extreme stress which began during the Covid pandemic due to tariffs, rising fuel costs, supply chain issues, processing labor costs and currency exchange rates. The situation dramatically worsened in August 2023 with the collapse of global seafood markets across all species. Russia has declared economic war on US Seafood and continues to put large volumes of cheap salmon and whitefish on the global markets to fund their war in Ukraine. The glut of Russian seafood is expected to continue into 2025, as Russia has already announced an increase in their pollock quotas for next year, against their own scientific advice. All of these negative pressures have resulted in low ex-vessel and wholesale prices across virtually all seafood species. We are seeing changes in the Kodiak waterfront as a result and are concerned about both processor and vessel consolidation as the industry struggles through these unprecedented times.

PWS Pollock Fishery Management

The Alaska Department of Fish and Game (ADF&G or Department) has done a thorough job describing the management of the PWS pollock fishery in their staff report. As they point out, the fishery is heavily regulated and managed. The fleet and processors have developed strong collaboration to create effective real time communication between the Department and the industry. The fleet must check in and out of the fishery, report harvest including bycatch species to the department daily and typically only 6 - 8 vessels are allowed to fish in the Sound at any one time. Besides the 5% bycatch limit divided across the different species/ species groups and the pollock guideline harvest level (GHL), there is also a 60% limit for each bycatch species or species group and pollock harvest for each section. Table 1 below shows the more refined bycatch caps for the 2023 fishery and actual catch as an example.

Table 1. 2023 PWS Fishery Summary (all units are round lbs, including salmon)

Mgmt Section Totals	Pollock	Rockfish	Salmon	Shark	Squid	Other	Total Bycatch	Vessels
Hinchinbrook	4,287,979	11,248	392	599	47,489	1,242	60,970	15
Port Bainbridge	1,806,754	1,975	1,698	793	4,088	2,109	10,663	6
Knight Island	940,585	684	383	3	1,085	1,210	3,365	3
Total Harvest (lb)	7,035,318	13,907	2,473	1,395	52,662	4,561	74,998	19
Annual GHL/Cap	7,309,316	36,547	2,924	70,169	219,279	36,547	365,466	
Lbs Remaining	273,998	22,640	451	68,774	166,617	31,986	290,468	
% caught	96.25%	61.95%	84.58%	1.99%	24.02%	12.48%	20.52%	

The vessels are also required to retain all pollock, rockfish and salmon. All proceeds for pollock in excess of the 300,000 pound trip limit and rockfish above the incidental catch limit of 0.5% must be surrendered to the State. The salmon retained can not be sold but can be donated to Food Banks. For rockfishes taken as bycatch, the trawl fleet's catch is predominantly shorttraker rockfish and some roughey rockfish, not yelloweye rockfish

Vessel Operations

Ability to Discard Catch: Vessels haul back their net and dump their catches directly into their refrigerated sea water (RSW) tanks. One haul can be between 50,000 to 150,000 pounds of pollock catch. The staff comments indicate that on average between 759 individual rockfish and 888 individual salmon were caught annually between 2021 and 2023. This compares to an average pollock catch over the same time

³ Kodiak Island Borough 2023 Comprehensive Annual Financial Report.

frame of approximately 6 million pounds (or 3.4 million individual pollock assuming 1.75 pound average per fish). When comparing the number of individual rockfish or individual salmon to the number of individual pollock, the catch is just 0.012% rockfish and 0.026% salmon. Sorting through all those pollock to remove the few individual fishes of bycatch is not practical. This is why all the accounting of the catch is done at the processing plants at time of offload.

Bottom Contact: A pelagic net and all the components run from \$150,000 to \$250,000. The Sound is very deep ranging in depth from 150 to 250 fathoms. Acoustic back scatter for the vessel's electronics do not provide the details to "see" the bottom with enough confidence to touch the sea floor with their net. The bottom type in PWS is rocky gullies and trenches. Losing a net at the beginning of the fishing season would be disastrous for the vessel and its crew. The pollock fleet does not fish their pelagic nets on the bottom in PWS.

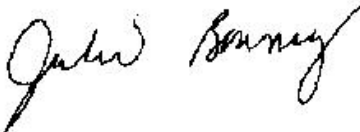
Monitoring: The majority of the Kodiak pollock fleet have electronic monitoring equipment on their vessels. They also carry at-sea observers when required within the federal fisheries. Developing a cost effective State observer/monitoring program for an average of 23 pollock trips annually would be difficult. As the Department suggests they have the authority to deploy onboard observers but do not have the authority to require electronic monitoring.

Unintended Consequences

Pollock are predators in the PWS Ecosystem. There have been several studies that show juvenile pink salmon survival is linked to the amount of adult pollock in the ecosystem within the Sound. Reducing pollock harvests will affect pink salmon survival which will in turn affect commercial salmon fisheries in the Sound. See Attachment 1 for a summary of research papers that show pollock consumption on pink salmon in PWS.

Not only are the actions described in Proposals 14, 15, 16, and 17 unwarranted, but they would cause real harm to Alaskans, including harvesters, processors and the community of Kodiak. We trust Department staff to continue managing the fishery as they have been and we concur with them that all four proposals should be rejected. Thank you for the opportunity to comment.

Sincerely,



Julie Bonney
Executive Director
Alaska Groundfish Data Bank