
ALASKA BOARD OF FISHERIES

Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod Meeting

Anchorage | October 30-31, 2025

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Alaska Whitefish Trawlers Association

PO Box 991 | Kodiak, Alaska 99615
Ph: (907) 654-9888 | <http://www.alaskawhitefishtrawlers.org>

October 15, 2025

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
P.O. Box 115526
Juneau, AK 99811-5526

Submitted via online portal

Re: Opposition to Proposals 1-8

Alaska Whitefish Trawlers Association (AWTA) is a Kodiak-based association representing trawl catcher-vessels that primarily target groundfish in the Gulf of Alaska, as well as harvesting halibut and Tanner crab, and tendering salmon in the summer. Most AWTA vessel owners, captains, and crew live in Kodiak. Kodiak is a major commercial fishing port in the U.S.¹ that relies on a diverse mix of fisheries, including trawl groundfish, salmon, crab, halibut, and sablefish. Trawl operates 11 months of year and allows Kodiak processing plants to remain open and available to process all species of fish throughout most of the year. Pacific cod (Pcod) is an important species for AWTA members and losing fishing opportunity for Pcod would hurt our fishing businesses, with negative trickle-down economic impacts to the community of Kodiak.

AWTA Opposes Proposals 1-8

All eight proposals seek to increase the state Pcod GHF from 30% of the total allowable harvest up to a range of 40-60%. Increasing the GHF will require a corresponding decrease in federal fishery Total Allowable Catch (TAC) in the Western Gulf of Alaska (WGOA). Federal fisheries in the WGOA have a broad range of participants with separate sector allocations, which are shown in Table 5 of RC2. In addition to the federal fishery there is also the parallel fishery, and fish caught in the parallel fishery are counted against federal TAC. The state South Alaska Peninsula Pacific cod (Pcod) fishery is limited to vessels under 58 feet using jig and pot gear, with pot gear accounting for 85% of this fishery.

If any of Proposals 1-8 are adopted then the amount of TAC available to some federal sectors may be too small to support opening a fishery (RC 2 at page 8). If federal fisheries cannot open then the parallel fishery also remains closed. Since the state South Peninsula and Kodiak Pcod fisheries are both Exclusive Registration Areas that means most Kodiak boats that traditionally fish Pcod in the WGOA will be shut out of this Pcod opportunity. The impact of these proposals would be felt by Kodiak boats under 58 feet that could otherwise fish in the state fishery, as well as over-58 foot Kodiak boats that use pot, trawl, and hook and line gear².

¹ NOAA Fisheries, *Fisheries of the United States 2022*

² According to the December 2024 NMFS In-Season Management [report](#) the number of catcher vessels participating in the WGOA Pcod fishery ranged from 26-65 boats each year between 2017-2024.

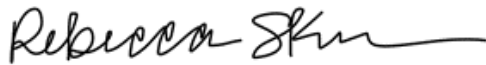
AWTA Comments to Alaska BOF October 30-31, 2025 meeting
October 15, 2025
Page 2 of 2

On the flip side, the benefit of these proposals will be concentrated in about 22 under-58 pot boats in the South Alaska Peninsula Area (Table 3 in RC2 indicates an average of 22 boats participated in this state fishery between 2018-2025). It does not make sense to hurt half of the Alaska-based fishing businesses that have a long history of catching Pcod in the WGOA, and concentrate the benefit of the action in a small subset of vessels.

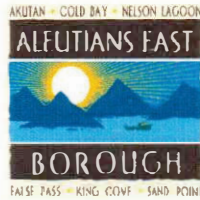
Pacific cod has been at low levels in the Gulf of Alaska (GOA) since about 2018, which has been really challenging to all the GOA communities and fishermen. This is not the right time for a major reallocation, especially if it hurts more Alaskans than it helps.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Skinner", with a long horizontal flourish extending to the right.

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association



RESOLUTION 26-13

A RESOLUTION OF THE ALEUTIANS EAST BOROUGH SUPPORTING LOCAL AREA FISHERMEN PROPOSALS TO INCREASE THE SOUTH PENINSULA STATE-WATERS PACIFIC COD GUIDELINE HARVEST LEVEL AND ENHANCE SUSTAINABILITY.

WHEREAS, Pacific cod is one of the 3 most important fish species for local commercial fishermen and communities of the Aleutians East Borough, and

WHEREAS, State-waters Pacific cod fisheries provide important opportunity for the many small local fishing vessels of the Aleutians East Borough, and

WHEREAS, the Alaska Board of Fisheries will consider State-waters Pacific Cod proposals for the Alaska Peninsula, Aleutian Islands, Bering Sea and Chignik at their October 30-31, 2025 meeting, and

WHEREAS, Pacific cod proposals 1 through 8 are from local Fish & Game Advisory Committees and local fishermen proposing to increase the South Peninsula area Pacific cod guideline harvest level, and

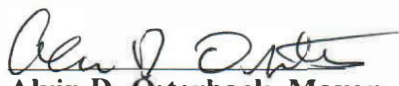
WHEREAS, the South Peninsula Pacific cod fishery is especially important to local fishermen, communities and processors, and increasing the GHF will help keep the fishery viable, and

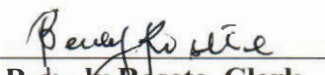
WHEREAS, Proposals 9 and 10 from the False Pass Advisory Committee attempt to better coordinate the South Peninsula and Dutch Harbor Subdistrict Pacific cod fisheries by closing waters near Unimak Island to enhance Pacific cod migration and aligning season start dates to provide more equal fishing opportunity and improved fishery sustainability.

NOW THEREFORE BE IT RESOLVED, the Aleutians East Borough Assembly supports Alaska Board of Fisheries Proposals 1 through 8 that would increase the South Peninsula Pacific cod GHF, and

BE IT FURTHER RESOLVED, the Aleutians East Borough Assembly supports Proposals 9 and 10 that allow for better migration of Pacific cod and enhance opportunity for all Borough Fishermen.

PASSED AND APPROVED by the Aleutians East Borough Assembly on this 11th day of September 2025.


Alvin D. Osterback, Mayor

ATTEST: 
Beyerly Rosete, Clerk

Submitted by: Brexten Benson

Community of Residence: Kodiak

I am writing this letter to express my opposition to all eleven of the proposed cod quota reallocations in the Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik areas. The interests I have considered which led to me opposing these proposals are quite simple: people, cod population, variability, and access.

These reallocations would be detrimental to the people of our communities, communities that depend on these fisheries for nearly everything including jobs, general economic growth and stability, and tax revenue. Reallocating quota as described in these proposals would increase the difficulty in catching the fish leading to fish being caught less efficiently, directly increasing the financial burden on the crews and captains as well as the greater community.

The population is not going to grow by reallocating quota. The quota is not changing, the same number of fish will be caught, only now with these proposals, the area where its able to be caught decreases. This puts a much greater burden on this small area to produce more fish to maintain its population, which increases the likelihood of the population decreasing, leading to a worse situation than we are currently in, not better.

These proposed reallocations are rash; they are being made based off of one year. Anyone who has ever fished can tell you that you can never plan on catching the same amount as the previous year. That is one of the reasons there are special federal tax laws for fishermen which require only one tax payment instead of quarterly payments, as it would be unreasonable to make us predict our income based on the prior year as it is mostly dependent on things beyond our control. Just the same, it would be unreasonable to make large changes to quota based off one year of fishing.

The gear types allowed for the federal allocation of the quota are numerous and shrinking the federal allocation would lead to the exclusion of many fishermen who are not allowed to fish in state waters. There are winners and losers to a reallocation as proposed, and the winners would be the larger fishing operations that can afford state and federal permits, they will have access to the same amount of quota as before albeit it will be concentrated in a smaller area as before mentioned. Now the losers are the little guys, the smaller fishing vessels with only a federal permit that cannot afford both permits, why do they always have to get the short end of the stick?

I oppose all eleven of these proposed reallocations as I feel I have a responsibility for my community and the fish that we depend on, while ensuring fair access, without making rash changes to an ever-fluctuating fishery.

Thank you

Re: Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod Proposals 1-11

Dear Members of the Alaska Board of Fish,

Please accept our written comment regarding Pacific cod proposals 1-11. I am writing this on behalf of our captains and crew as well as myself. Pacific cod is an instrumental component of our operation. It is essential in supporting the livelihood of our captains and crew, a majority of whom reside in Alaska.

In summary, our positions are as follows:

Proposals 1-8: Oppose**Proposal 9: Oppose****Proposal 10: Oppose****Proposal 11: Neutral****Proposals 1-8: Oppose**

We are generally in support of state-water fisheries, and the South Alaska Peninsula (SAP) state-water Pacific cod fishery is no exception. With that said, there needs to be a balance between state-water and Federal opportunities. The reality is that both are suffering since the recent GOA Pacific cod collapse. The SAP state-water fishery is currently allocated 30% of the Western Gulf of Alaska (WGOA) ABC. This is already a large portion of the overall Pacific cod opportunity for WGOA. To my knowledge, only the Aleutian Island state-water allocation is greater by percentage, with that being 35% of the Aleutian Island ABC. To increase the SAP GHF by over 50% in a single action to unprecedented levels is too extreme for us to support.

Furthermore, if action is taken to increase the SAP GHF, it will come at the direct expense of the Federal participants whom have had to make significant capital expenditures to participate in an already marginal fishery. We support balanced opportunity and as such oppose proposals 1-8.

Proposals 9: Oppose

On the surface this proposal claims to promote equitable fishing opportunities. The reality is that it would severely harm the Dutch Harbor Subdistrict (DHS) state-water Pacific cod fishery by removing what has been traditionally some of the most productive grounds in the DHS. The impact of the closure for the South Alaska Peninsula (SAP) state-water Pacific would be nearly negligible based off ADF&G data. Furthermore, there is no basis for the claim that implementing this closure area would have any positive impact to the SAP. There is even a case that it could be detrimental to both the DHS and SAP by reducing fleet efficiency and/or redirecting fishing effort. Given the lack of basis, and most importantly, the harm it would do to the DHS Pacific cod fishery, we strongly oppose this proposal.

Proposal 10: Oppose

Proposal 10 claims to be based in promoting equitable fishing opportunities but it comes at the sole expense of the Dutch Harbor Subdistrict (DHS) fishery. Additionally, it lacks the basis that it would positively impact the South Alaska Peninsula (SAP) fishery.

The negative impacts to the DHS fishery are numerous. It would simultaneously decrease fleet efficiency, reduce overall fishery value, and push the fishery later into the season. The latter, forcing the fleet to fish on historically lower quality fish and lower catch per unit effort (CPUE) all while increasing opportunity costs for the fleet and processors.

The SAP has been fully harvesting their fishery in a fraction of the time that it takes the DHS to do so. Even with the SAP having a later start date, they have proven to fully harvest their GHF earlier than the DHS has in most cases.

Given the above, we strongly oppose proposal 10.

Proposal 11: Neutral

While we are in support of proposal 11's intent of protecting the Aleutian Island ecosystem we feel further research is warranted prior to taking such action.

We appreciate your consideration on these matters.

Sincerely,

Blake Burkholder

Blake Burkholder



October 14, 2025

Marit Carlson-Van Dort
Alaska Board of Fisheries Chair
Alaska Board of Fisheries/Game
P.O. Box 115526
Juneau, AK 99811-5526

RE: South Alaska Peninsula Pacific Cod Board of Fish Meeting (Proposals 1-8)

Dear Chair Carlson-Van Dort,

The undersigned Community Development Quota (CDQ) groups respectfully urge the Alaska Board of Fisheries to delay consideration of Proposals 1-8, all of which would substantially increase the current Guideline Harvest Level (GHL) for the Western Gulf of Alaska (WGOA) state-waters Pacific cod fishery. While we fully support state water fisheries, we believe that current management uncertainties, and the significant allocative consequences for Alaskan stakeholders participating in the Pacific cod federal fisheries, including CDQ groups who are heavily invested in the GOA hook and line catcher processor (HAL) sector, warrant delaying consideration of these proposals at this time.

About the CDQ Program

The CDQ Program was established in 1992 by the State of Alaska to help support fisheries based economic development in 65 Western Alaska communities and is entirely dependent on the revenue it generates from federal fisheries to fund this mission. The CDQ program continues to grow as a major contributor to Alaskan ownership of the federal fisheries and is the vehicle by which tens of thousands of rural Alaskan residents benefit through direct ownership of quota, vessels, and shore-based processing. At the end of the last program review in 2020, CDQs directly accounted for approximately 20% of in-region employment and labor income representing 2,300 jobs and provided scholarship funding to over 1,000 students. CDQ groups also offer broad reaching programs to support small boat fisheries in state and federal waters. Over the years, these have included providing market access in very remote communities by operating shoreside processing facilities, tendering, and buying stations, as well as grants and loan programs to help with vessel, permit, and quota purchases. Each year CDQ groups also fund substantial cooperative research efforts that aid in the management of state water salmon fisheries, in collaboration with ADFG. Annually, the sector invests \$80-\$100 million in Western Alaska towards these goals and the program is playing an increasingly important role in its member communities as state and federal resources have declined.

Current Management Uncertainties

Since the proposal submission deadline, there is new information related to Pacific cod biology and abundance that we believe warrants caution by the Board. Recent studies have created a new understanding of how WGOA and Bering Sea Pacific cod stocks interact, and federal scientists have indicated that they will likely initiate changes to the stock assessment of Pacific cod in the coming years due to this new information. These changes could have significant impacts on WGOA biomass estimates. While we do not yet know whether these will lead to increases or decreases in WGOA Pacific cod, if the BOF makes decisions based on historical abundances and allocations, these may not be representative of future circumstances. Additionally, the 2025 GOA trawl survey shows a 39% increase in Pacific biomass, which is likely to increase the GHL in 2026, potentially addressing some harvest concerns without requiring reallocation. While future ABCs are unknown, as well as apportionments to the WGOA, both are positively correlated to the trawl survey catches of Pacific cod. The likely potential for increases to the WGOA GHL next year provides some additional time for the BOF to take in new information before making significant changes to the GHL while the extent of upcoming federal management changes becomes clearer.

Negative Impact to Alaska Businesses and Communities

Proposals 1-8 will have significant negative impacts on Alaska businesses and communities. Alaskan interest and history in the GOA HAL CP sector are substantial. Much of the freezer longline fleet originated in Kodiak and other GOA communities following the departure of foreign fleets from Alaska's waters in the 1970s. Today's participants in the fishery include four CDQ groups and one Alaska Native Corporation. The fleet also includes the Arctic Prowler, built in Ketchikan, the largest fishing vessel ever constructed in Alaska. Altogether, 90% of the WGOA quota allocated within the sector goes to Alaskan-owned operators.

The WGOA GHL is 30% of the WGOA ABC, representing the highest in the GOA management areas; the remaining TAC is allocated amongst the numerous remaining federal sectors. Of this, the HAL sector is allocated a static percentage (19.2%) of the WGOA TAC, so every 5% increase to the GHL fishery represents a 7% decrease to the HAL sector, independent of changes to the ABC. Any action to increase the GHL fishery will come at the direct expense of Alaska-based businesses in the federal fisheries who rely on the WGOA as a key component of their harvest operations, including vessels of all sizes and gear types and heavily Alaskan-owned fleets that contribute greatly to the economies of Western Alaska communities.

While we understand that the impetus for requests to increase the GHL stems from declining quotas in recent years, all sectors have been facing operational challenges that would be exacerbated if the federal TACs were reduced further, compromising the viability of the remaining platforms. In recent years, sharp quota declines have made it increasingly difficult for long-time participants in the freezer longline sector to operate, and allocations have been so low that the available harvest is often insufficient to justify the cost of deploying a vessel and crew, resulting in only a couple Alaskan owned vessels fishing the entirety of the quota and distributing benefits to other members through harvest agreements.

We fully appreciate the importance of state water fishery opportunities to Alaskans, and are committed to collaborative, long-term solutions that provide stability for all sectors. The CDQ program's purpose is to support fisheries' access and participation for our residents, and we have

created many programs structured to do just that throughout our regions. As you evaluate this proposal, we respectfully request that the BOF consider the Alaskan participation in both the state and federal WGOA Pacific cod fisheries, and how potential forthcoming changes to the federal management create challenges in fully assessing the impacts and tradeoffs of Proposals 1-8 at this time.

Sincerely,



Luke Fanning, Chief Executive Officer
Aleutian Pribilof Island Community
Development Association



Michael Link, President and CEO
Bristol Bay Economic Development
Corporation



Ragnar Alstrom, Executive Director
Yukon Delta Fisheries Development
Association



Eric Deakin, Chief Executive Officer
Coastal Villages Region Fund



Simon Kineen, Vice President
Norton Sound Economic
Development Corporation

CC: Alaska Board of Fisheries Members
Alaska Department of Fish & Game

Submitted by: Josh Cozby

Northern Enterprises LLC

Community of Residence: Vancouver, WA

Public Comment on Proposal 11 and AIS Subdistrict Trip Limit

I support Proposal 11 to close all waters west of 170°W longitude to trawl gear. This measure is essential for protecting vulnerable marine ecosystems, preserving fish stocks, and promoting more sustainable fishing practices in the region. Limiting trawl activity in these waters helps reduce bycatch and habitat destruction, ensuring the long-term health of the marine environment and the communities that depend on it.

In addition, I would like to propose a change to the trip limit regulation in the AIS subdistrict west of the 170° line.

I am the owner of the Icelandier, a 100-foot tender/pot cod vessel. We have participated in the state waters cod fishery in Adak for several years on and off. Adak is an extremely challenging location to fish, primarily due to the logistical difficulties in delivering catch to a shoreside processor.

One of the major obstacles is the need for tenders to retrieve the product, and the high fuel and transport costs associated with operating in such a remote area. These costs are difficult to absorb under the current 150,000-pound daily/delivery trip limit. My proposal is to lift or increase the 150,000 lb trip limit in order to allow for larger, more economically viable deliveries.

For both fishermen and processors, the current limit makes it hard to justify the investment required to harvest and process cod in Adak. Shoreside processors struggle to make the economics work without sufficient volume, and fishermen face high operating costs that can't be offset by small loads.

This trip limit was originally intended to ensure equitable access for multiple gear types. However, if Proposal 11 passes, most of those other gear types (particularly trawl) will no longer be operating in the area, making that concern largely irrelevant.

Allowing for larger deliveries would increase the likelihood that the AIS cod quota is fully and efficiently harvested. Without this change, I fear the quota will continue to go unharvested due to lack of participation—simply because it's not profitable under current restrictions.

Thank you for considering this proposal in conjunction with Proposal 11. These changes together would support both sustainable fisheries management and the economic viability of the cod fishery in Adak.

Sincerely,

Josh Cozby

Owner/Operator, F/V Icelandier

Home Port: Kodiak, AK

Submitted by: Conor Fitzgerald
Ocean Invictus

Community of Residence: Kodiak

I'm writing not just as a fisherman, but as someone whose life and livelihood depend on the cod I catch. Reducing the trawl fleet's quota would create significant hardship for me—more uncertainty and constant worry about providing for my family.

What feels most unjust is reallocating fish from the federal fishery without adequate justification. Cod stocks are recovering. Increasing the state harvest won't grow the overall population and could undermine recovery efforts. When WGOA cod quotas were drastically cut, all fishermen shared the burden equally. Those cuts don't justify now transferring 20–30% from the federal fishery to state waters and would only serve to further harm a particular subset of fishermen.

Fishing isn't just my job—it's my way of life. Every quota reduction feels like losing another piece of what I've built. I'm asking you to consider the people behind these numbers—the fishermen and families who will bear the weight of this decision every single day.

-Conor Fitzgerald

Submitted by: Robert Graham
Community of Residence: Kodiak, AK

Opposition to proposal 1-10 below.

I've been fishing in Alaska since 1999, and I oppose these proposals to increase the state-waters quota for the following reasons:

Both state and federal fisheries deliver to the same plants. The town receives the same tax revenue regardless. These proposals don't provide additional community benefits—they simply shift the burden to another community.

A single year's harvest results are not sufficient reason to dramatically alter the allocation between state and federal fisheries, especially when we need stability and close monitoring.

Federal fishery participants have families to support and bills to pay, just like any other fleet. There's little logic in continuing to reallocate from federal to state under this rationale.

The 610 fishery is permit-limited—only a certain number of people can participate. However, there's overlap between state and federal that already allows state fishery participants to fish both. These proposals exclude one group without providing an alternative. In addition, the increase is likely to make

the state fishery more saturated with competition, driving down the value of the fishery on a per boat basis.

After 27 years of fishing in Alaska, I believe this is a shortsighted measure that will do more harm than good in the long term.

Thank you,
Robert Graham
Captain of FV Ocean Invictus

PC9

Submitted by: Chandler Johnson
F/v Elizabeth F. F/v Walter N

Community of Residence: Kodiak

I'm commenting on south peninsula proposals 1-8.

I am representing two local kodiak boats with history of fishing area 610 cod with trawl gear. While we haven't fished there for a few years due to various reasons it is an important option for us. Fish populations come and go and codfish may be at a low level right now but that doesn't mean that in a few years the population won't bounce back and be robust again. Lately we have been fishing more in kodiak but in the past have concentrated more on area 610.

To take a federal fishery and give it to a select few vessels that are under 60' is just taking away from other vessels that also rely on it. We live in kodiak. Also a coastal community that is struggling. Fish prices are horrible and to have fishing options taken from us just makes it harder to survive. We need to be able to adapt and fish where the fish are.

We are against transferring more fish from the federal fishery into a state fishery that excludes us.

Thank you
Chandler Johnson

Submitted by: Garrett Kavanaugh
None

Community of Residence: Kodiak

Chair Carlson-Van Dort and Members of the Board,

Oct 13, 2025

1-8 Support; 9 Oppose; 10 Oppose; 11 Support

My name is Garrett Kavanaugh, I am 27 yrs old, and I am testifying on my own behalf. I operate the FV Insatiable for pot cod in state and federal waters. AT 16, I received my HS diploma and started fishing full time. I fish cod from Kodiak to Adak, which accounts for 60-80 percent of my income. The remainder of my income relies on other State Waters fisheries.

At 24 years old, I invested in a 113 ft tender vessel that operates in the Central and Western Gulf, as well as the Bering Sea. I hold a 100-ton license. I'm a lifetime member of UFA; I serve in leadership positions for KCAC (Kodiak Crab Alliance Cooperative) and USCH (Under 60 Cod Harvesters). I would have liked to attend this meeting in person, but I am currently out fishing cod in the Western Gulf.

I am consistently supportive of state managed fisheries and the right to oversee those resources within state waters. PROPOSALS 1-8 offer an increase of State Pacific Cod GHL from 30% of the overall ABC to a range of 40-50%. This action, if supported by the Board, would provide a robust and secure fishery for the State Waters cod fleet. I am supportive of a step-up/ step down action similar to the Boards action for the State Waters Area O fishery.

There is not any way to separate my support of the previous proposals and my opposition of PROPOSALS 9 & 10. Both 9 & 10 restrict and delay the prosecution of the state waters fisheries in the BSAI and South Penn. These two areas have seen a recent uptick in landings during a time when we have lacked survey data. All ground fisheries are dependent on consistent surveys that inform a optimum TAC/GHL. It is my opinion that the focus should be on ensuring constant survey data that determines the available biomass and sets GHLs and TACs based on conservation. We all saw what happens when the cod quota is restricted and catch doesn't happen, the fleet numbers fall and fishermen adjust. We are currently seeing more cod and the fleet is slowly building capacity. This is the ideal scenario and how an open fishery works. Therefore, I support an increased GHL providing more state opportunities, but the fleet also needs the opportunity necessary to harvest the quota. My vessel has been one of the last vessels on the grounds for the past two years. We fish until the processors close. If we lose opportunity mid-season or are unable to fish within a reasonable distance from our market, there would be the potential to strand fish.

To summarize, I support the proposed version of (1-8) in my written testimony, do not support combining proposals (1-8) with 9 and/or 10, and am opposed to 9 & 10 due to lost opportunity, restricted market access, safety, and stranding GHL.

I would also like to provide my support for PROPOSAL 11. I am aware of the increased trawl pressure in the AI golden king crab habitat area and am concerned about the biological conservation of female and juvenile crabs.

Garrett Kavanaugh, Kodiak Alaska

PC10

Submitted by: Garrett Kavanaugh

Community of Residence: Kodiak

1-8 support, I always support state managed fisheries.

9 oppose

10 oppose

11 support

Chair Carlson-Van Dort and Members of the Board,

Oct 13, 2025

1-8 Support; 9 Oppose; 10 Oppose; 11 Support

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I would also like to provide my support for PROPOSAL 11. I am aware of the increased trawl pressure in the AI golden king crab habitat area and am concerned about the biological conservation of female and juvenile crabs.

Garrett Kavanaugh, Kodiak Alaska

Submitted by: Buck Laukitis

Community of Residence: Homer, AK

I oppose proposals 9 and 10. The state water cod GHL fisheries have been a shining star of state management of marine resources. Low bycatch harvest, by and for state residents, delivered to shore plants in Alaska. We have fished the state water GHL fisheries in area M and area O since their inceptions. I helped develop the first state GHL fishery in area M in 1996 and later in area O. These two proposals are entirely misguided. Please see the ATTACHED detailed comments.

Background for opposition to proposals 9 and 10:

Stock Assessment Process for Pacific Cod in the GOA and BSAI

Pacific cod stocks in the Gulf of Alaska (GOA) and Bering Sea/Aleutian Islands (BSAI) are assessed annually as part of the North Pacific Fishery Management Council's (NPFMC) groundfish management process. These assessments use data from fishery-dependent sources (like catch reports) and fishery-independent sources (like NOAA trawl surveys) to estimate stock biomass, recruitment, fishing mortality, and future projections. The process is handled by two separate plan teams—the GOA Groundfish Plan Team and the BSAI Groundfish Plan Team—because the regions have distinct ecosystems, migration patterns, and data needs. While there is some limited migration between the western GOA and southern BSAI, the stocks are treated as genetically and management-wise distinct, with no shared assessment model.

Here's a simple step-by-step overview of how each plan team recommends the stock assessment:

1. Data Collection (Year-Round, Led by NOAA's Alaska Fisheries Science Center - AFSC): Scientists gather survey data (e.g., bottom trawl surveys every 1-2 years), catch logs, age/length samples from landings, and environmental data (e.g., ocean temperature affecting recruitment). For GOA, surveys focus on shelf and slope areas from Southeast to Kodiak; for BSAI, they cover the eastern Bering Sea shelf and Aleutian Islands. Data is updated through the most recent fishing year (e.g., 2024 data informs 2025 assessments).
2. Model Development and Draft Assessment (Summer/Fall): AFSC stock assessment authors build age-structured models (e.g., using software like Stock Synthesis) to estimate current biomass and project future scenarios under different harvest levels. The GOA team emphasizes regional variations (Western, Central, Eastern GOA), while the BSAI team separates Eastern Bering Sea (EBS) from Aleutian Islands (AI) due to different productivity. Draft reports include overfishing level (OFL) candidates (the maximum harvest without overfishing) and acceptable biological catch (ABC) buffers (a conservative reduction from OFL for uncertainty).
3. Plan Team Review (September/October):
 - The GOA Groundfish Plan Team (scientists, managers, and stakeholders) meets to review the Pacific cod chapter in the GOA Stock Assessment and Fishery Evaluation (SAFE) report. They scrutinize model assumptions, data quality, and projections, then recommend OFL/ABC values to the NPFMC's Scientific and Statistical Committee (SSC).
 - Separately, the BSAI Groundfish Plan Team does the same for the BSAI SAFE report, focusing on EBS and AI specifics (e.g., AI cod has higher uncertainty due to sparser surveys). They also recommend values to the SSC.
 - Both teams incorporate ecosystem factors (e.g., 2016s warm "Blob" effects reduced GOA recruitment) but operate independently—no cross-region adjustments.
4. SSC Endorsement (October/November): The SSC (independent scientists) reviews and endorses or adjusts the plan teams' recommendations during NPFMC meetings, ensuring they're based on the "best scientific information available."

This process repeats yearly, with full benchmark assessments every 2-4 years (e.g., GOA's last full model in 2019, updated annually; BSAI's in 2023). The result: Region-specific OFL/ABC recommendations that feed into harvest decisions.

How the NPFMC Sets ABC, Overfishing Levels (OFL), Total Allowable Catches (TACs), and State of Alaska GHL Reductions

Once the plan teams and SSC provide OFL/ABC recommendations, the NPFMC (the Council) finalizes them at its December meeting, balancing science with socioeconomic factors (e.g., fleet impacts, bycatch). NMFS then implements via harvest specifications published in February/March. ABC is set at or below the SSC's recommendation (often reduced for extra caution). OFL is the hard ceiling (cannot be exceeded). TAC is the harvest target, set at or below ABC, and apportioned by gear/sector/season.

State GHLs (Guideline Harvest Levels) are Alaska's parallel fisheries in state waters (0-3 miles offshore). They're a fixed percentage of the Federal ABC to avoid overharvest, set by the Alaska Board of Fisheries but coordinated with NPFMC TACs (Federal TACs are reduced by the

GHL amount). If stocks decline, GHLs automatically shrink proportionally, acting as a built-in reduction mechanism.

Simple steps:

1. Council Review and Approval (December): NPFMC adopts SSC's OFL/ABC, sets $TAC \leq ABC$ (factoring in GHLs, bycatch, and economics).
2. NMFS Finalizes (February/March): Publishes in Federal Register; TACs include seasonal/gear splits.
3. GHL Calculation and Reductions (Concurrent): State sets GHL as % of ABC (e.g., GOA: 30% Western, 25% Central/Eastern; BS: ~11% of EBS ABC). If ABC drops, GHL drops automatically—no separate vote needed.
4. Monitoring and Adjustments: In-season cuts if TACs near limits; post-season reviews for next year.

2025 Examples

- GOA Pacific Cod:
 - OFL: ~41,000 mt (projected; exact from 2024 SAFE, endorsed by SSC).
 - ABC: ~33,000 mt (SSC reduced from max permissible for recruitment uncertainty post-warm waters).
 - TAC: 23,670 mt (Council set below ABC to account for ~8,471 mt State GHL across regions; up from 2024's 20,757 mt due to slight biomass rebound).
 - GHL Reductions: Tied to ABC—Western GOA GHL ~9,900 mt (30% of regional ABC, minor ~2% cut from 2024 due to stable surveys); Central/Eastern ~4,200 mt each (25%). Total state harvest projected at 8,471 mt, down slightly but spared major cuts (only ~1-3% reduction vs. 2024) thanks to better 2023 recruitment data.
 - BSAI Pacific Cod (EBS/AI combined for simplicity; EBS dominates):
 - OFL: ~295,000 mt (from 2023 assessment update, stable).
 - ABC: ~220,000 mt (SSC buffer for environmental variability).
 - TAC: ~199,000 mt
 - GHL Reductions: BS GHL ~12,471 mt (11% of EBS ABC + buffer, ~9% cut from 2024 matching Federal reduction); AI GHL capped at ~6,804 mt max (39% of AI ABC, no change). State's total ~13,000 mt, directly scaled to ABC drop.
- These 2025 specs reflect a rebound in GOA (TAC up 14%) but caution in BSAI (TAC down 9%), driven by region-specific survey data.

Key Emphasis: GOA and BSAI Processes Are Entirely Separate

The GOA and BSAI are managed as completely independent units under separate chapters of the NPFMC's Fishery Management Plans, with distinct plan teams, assessments, and harvest specs. Genetic studies show limited mixing (e.g., some western GOA cod from southern BS, but not enough to link models). Adding or subtracting fish (e.g., via TAC changes) in one area does not affect the other—no shared quotas, no cross-region adjustments. A BS cut (like 2025's 9%) boosts GOA opportunities without penalty, and vice versa, ensuring localized sustainability while maximizing overall fishery health. This separation prevents one region's issues (e.g., BS warm-water die-offs) from cascading.

Summary of the Separateness of GOA and BSAI Pacific Cod Assessments and Quotas
The Gulf of Alaska (GOA) and Bering Sea/Aleutian Islands (BSAI) Pacific cod stocks are managed as entirely separate entities under the North Pacific Fishery Management Council (NPFMC). Each region has its own:

- Stock Assessment Process: Conducted by distinct GOA and BSAI Groundfish Plan Teams using separate data (e.g., NOAA trawl surveys, catch logs) and models tailored to regional ecosystems. The Alaska Fisheries Science Center (AFSC) provides independent assessments for GOA (Area M) and BSAI (including Area O in the Bering Sea), with no shared biomass or harvest calculations. Limited migration (e.g., some western GOA cod from southern BS) is

acknowledged but insufficient to merge models, as stocks are genetically and ecologically distinct.

- Annual Quotas: The NPFMC sets Acceptable Biological Catch (ABC), Overfishing Levels (OFL), and Total Allowable Catches (TACs) separately for GOA and BSAI based on region-specific assessments. The State of Alaska's Guideline Harvest Levels (GHLs) are calculated as fixed percentages of each region's ABC (e.g., ~11% for BS, 25-30% for GOA regions). These quotas are independent—GOA's Area M GHL and BSAI's Area O GHL do not influence each other.
- **Note that the BSAI cod population is approximately 600% larger than the GOA population (ABC of 295,000 MT vs. 41,000 MT) The GOA TAC was cut approximately 85% after the 2016 stock assessment. The WG has not recovered from the loss of population caused by the warm water "Blob". The BS was not affected by the Blob to the same degree as the GOA. The authors of proposals 9 and 10 are confusing correlation and causation (the increase in GHL for a developing Area O fishery with the cod decline in the GOA).**

The key take-away: A proposal to reduce fishing in the BSAI, such as curtailing the GHL in Area O (Bering Sea state waters), will not increase fishing opportunities or quotas in the GOA (Area M). This is because:

- **No Cross-Region Quota Linkage:** The GOA and BSAI quotas are set independently based on separate stock assessments. Reducing the BS GHL (e.g., by limiting fishing time or area) only lowers the state's harvest within the BS TAC, leaving the GOA's ABC, TAC, and GHL unchanged. For example, cutting BS's 2025 GHL (~12,471 mt) by 10% would reduce BS state harvests but have no effect on GOA's ~8,471 mt GHL or 23,670 mt TAC.
- **Illogical Expectation of Quota Transfer:** The proposal assumes a connection between BS and GOA harvests doesn't exist in the current management framework. Without a complete overhaul of the NPFMC's process to integrate migration and mixing (e.g., a single stock model for both regions), reducing BS fishing cannot redirect quota to GOA. Such a change would require years of new genetic, migration, and biomass studies, plus a new Fishery Management Plan—highly unlikely given the robustness of the existing system.
- **Robust Management System:** The State of Alaska, AFSC, NPFMC, and Scientific and Statistical Committee (SSC) use a rigorous, science-driven process. Assessments incorporate the best available data (e.g., 2024 surveys showing BS biomass decline vs. GOA rebound). The SSC ensures conservative ABCs, and GHLs automatically scale with ABC changes, preventing overfishing. This system has maintained sustainable cod fisheries for decades, with no need for cross-region quota shifts.

Conclusion

Reducing the BS Area O GHL offers no positive benefit for GOA's Area M fishery. The separate assessments and quotas ensure that changes in one region do not affect the other. Any proposal suggesting otherwise ignores the established, independent management structure and would require an impractical restructuring of a proven system.

Proposal 9: Closed Waters Adjacent to Unimak Pass for Pacific Cod Fisheries

Dear Alaska Board of Fisheries,

I am writing to strongly **oppose** Proposal 9, which proposes amending 5 AAC 28.650 and adding a new section 5 AAC 28.5XX to establish closed waters adjacent to Unimak Pass in both the Dutch Harbor Subdistrict (DHS, Area O) of the Bering Sea-Aleutian Islands (BSAI) and

the South Alaska Peninsula (SAP) Area for state-waters Pacific cod fisheries. **While the proposal cites concerns over migration corridors, fleet competition, and equitable access, it is scientifically unfounded, would devastate the Area O fishery by effectively closing the majority of its productive grounds, and fails to deliver any conservation or equity benefits.** This measure ignores the robust, data-driven management by the Alaska Department of Fish and Game (ADFG), Alaska Fisheries Science Center (AFSC), North Pacific Fishery Management Council (NPFMC), and Scientific and Statistical Committee (SSC). Below, I detail the key flaws.

1. Flawed Scientific Basis: Overstated Migration and No Evidence of Depletion or Unfair Advantages

The proposal assumes Unimak Pass is a “critical migration corridor” requiring protection from “unobstructed” fishing to prevent depletion and promote equity between DHS and SAP fleets. However, AFSC and NPFMC assessments treat BSAI and Gulf of Alaska (GOA) Pacific cod as separate stocks with only limited, localized mixing—insufficient to warrant cross-region closures. Genetic studies (e.g., Spies et al., 2019; Drinan et al., 2018) show distinct spawning groups: Unimak Pass cod are genetically differentiated from GOA populations ($F_{ST}=0.001-0.004$), with isolation-by-distance patterns but no large-scale, harvest-impacting migrations. Tagging data from 2002-2006 (AFSC FIT) and 2003 releases near Unimak/Amak indicate seasonal movements within the eastern Bering Sea shelf, but recoveries are dispersed northward and westward, not en masse to GOA spawning grounds.

The BSAI stock is not overfished and not subject to overfishing (2023 assessment), with quotas set conservatively via annual AFSC models incorporating Unimak-area data. Localized depletion studies near Unimak (AFSC, 2002-2006) found no conclusive effects from fishing, even during spawning aggregations. “Increasing competition” between DHS and SAP fleets is anecdotal; ADFG’s parallel-season structure (state waters open post-federal closure) already balances access without evidence of “unfair advantages.” Imposing closures based on unverified traditional knowledge over “best scientific information available” undermines decades of sustainable management.

2. De Facto Closure of the Area O Fishery: Targets Core Harvest Areas

The DHS closure (5 AAC 28.650(d)) prohibits Pacific cod fishing in “all waters of Alaska adjacent to Unimak Island west of 164° 48.200’ W. long.” during state-waters seasons. Unimak Pass lies at ~164°30’ W, and the DHS (Area O) spans ~166°30’ W to 164° W (per 5 AAC 28.648(a)). This line slices through the eastern DHS, but the vast majority of Area O harvest occurs west of 164°48.200’ W—in the productive “Cod Alley” grounds northwest of Unimak, where pre-spawning aggregations concentrate (ADFG statistical areas 515 and 520, centered ~165°-166° W).

ADFG data confirms this: In 2023-2024, ~80-90% of DHS pot gear landings (~6,500-7,400 mt out of ~7,800-8,200 mt total GHL) came from waters west of ~165° W, per commercial operator reports and NMFS observer logs. The SAP closure (new 5 AAC 28.5XX(a), west of 164°19.200’ W) similarly buffers from the west but overlaps minimally with SAP’s core areas east of the pass (~163°-164° W). For DHS, this is not a “buffer”—it’s a blanket prohibition on most fishing grounds, effectively closing Area O during its ~10-month season (January-November). Existing closures (e.g., south of 53°06.11’ N in (c)) already protect nearshore areas; this expands them illogically.

3. Catastrophic Economic and Community Impacts Without Benefits

DHS is Alaska’s largest state-managed Pacific cod fishery, with a 2025 GHL of ~12,471 mt (11% of BSAI ABC), ~60-70% (~7,500-8,700 mt) from the Dutch Harbor Subdistrict. **Closing core areas west of 164°48.200’ W would slash harvest by 70-80% (5,250-7,000 mt lost), based on spatial distribution in ADFG’s 2023-2024 reports (e.g., 85% of pot gear catch from statistical areas >164°50’ W).**

Economic Losses:

- Direct Exvessel Value: At \$0.50-\$0.60/lb (~\$1,100-\$1,320/mt), lost harvest equates to \$5.8-9.2 million annually—~75% of the fishery's ~\$8-11 million total value (2023: ~\$10.2 million).
 - Multiplier Effects: NMFS estimates groundfish impacts at 1.5-2.0x direct value, yielding \$8.7-18.4 million in lost revenue, wages (~\$3-4 million for 50-60 small vessels/crews), and port activity in Unalaska/Dutch Harbor—the nation's top port by volume. This exacerbates recent challenges (e.g., 9% GHLL cut in 2025, fleet participation down 20%). For SAP, impacts are minor (~10-20% GHLL affected, ~500-1,000 mt lost), but the asymmetric harm to DHS undermines “equity.” No offsetting benefits: Fish aren't “redirected” to SAP, as stocks are managed separately. In-season monitoring already prevents conflicts; closures add bureaucracy without gains.
4. No Benefit to SAP or Overall Sustainability: Separate Management Frameworks
No positive benefit will accrue to SAP (Area M equivalent in GOA context) from these DHS closures. BSAI (DHS/Area O) and GOA/SAP are entirely separate under NPFMC plans:

Under harvest in DHS leaves fish for federal fleets (e.g., larger vessels east of closures), not SAP spawning. SAP's 2025 TAC rose 14% on its own data; BSAI's fell 9% without cross-adjustments. True equity requires NPFMC-level migration studies, not unilateral state closures that contradict AFSC findings.

Recommendation

Reject Proposal 9 outright. The current system—parallel seasons, GHLLs tied to regional ABCs, and in-season adjustments—sustains fisheries without arbitrary restrictions. If concerns linger, support AFSC tagging expansions via NPFMC, not economically ruinous zones. This preserves jobs in the Aleutian East and Aleutian West Boroughs while honoring science.

Thank you for your consideration.

Sincerely,
Buck Laukitis

Proposal 10: Dutch Harbor Subdistrict Pacific Cod Management Plan
Dear Alaska Board of Fisheries,

I am writing to **oppose Proposal 10**, which seeks to amend 5 AAC 28.648(d) by delaying the opening of the Dutch Harbor Subdistrict (Area O) state-waters Pacific cod pot gear season to seven days after the closure of the federal Bering Sea/Aleutian Islands (BSAI) pot/longline catcher vessel under 60 feet season or March 7, whichever is later. While the intent to align seasons based on traditional knowledge of cod migration is understandable, this proposal is fundamentally flawed in its rationale, would impose severe economic harm on local fishermen without achieving its stated conservation goals, and ignores the robust, science-based management framework that already sustains these fisheries. Below, I outline key concerns.

1. Misguided Assumption of Significant Stock Mixing and Migration Impacts

The proposal relies on “traditional and local knowledge” suggesting Pacific cod migrate en masse from the BSAI through Unimak Pass to Western Gulf of Alaska (WGOA, including Area M) spawning grounds in winter, implying that early Area O harvests deplete fish needed for GOA spawning. However, scientific assessments from the Alaska Fisheries Science Center (AFSC), North Pacific Fishery Management Council (NPFMC), and Scientific and Statistical Committee (SSC) treat BSAI and GOA Pacific cod as separate stocks with only limited, localized migration (primarily from southern BSAI to western GOA). Genetic and tagging studies show no evidence of large-scale, harvest-altering movements that would justify cross-region season alignment.

- The NPFMC's separate GOA and BSAI Groundfish Plan Teams conduct independent annual stock assessments using region-specific data (e.g., BSAI Eastern Bering Sea trawl surveys vs. GOA shelf/slope surveys). These models do not incorporate shared biomass adjustments for migration, as the stocks are ecologically and genetically distinct.

- Delaying Area O harvests would not “allow some portion of the migrating stock to spawn in the WGOA,” as claimed. Any minor migrants would still face GOA harvests under its own Guideline Harvest Level (GHL), set independently at 25-30% of the GOA ABC. The proposal’s logic assumes a connected quota system that does not exist—reducing BSAI effort cannot increase GOA opportunities or biomass.

This proposal would require overhauling the NPFMC’s Fishery Management Plans to integrate migration modeling, a process demanding years of new data and unlikely to yield the benefits imagined. In the meantime, it risks unnecessary restrictions based on anecdotal rather than “best scientific information available.”

2. Drastic Reduction in Fishing Time, Ignoring Historical Patterns

Under current regulations, the Area O pot gear season opens seven days after the federal under-60-foot vessel season closes, allowing access to peak winter abundance when cod aggregate near shore. Recent federal closures have occurred in mid-to-late January, resulting in Area O openings around late January:

- 2022: Federal closure January 26 → Area O open ~February 2.
- 2023: Federal closure January 16 → Area O open ~January 23.
- 2024: Federal closure January 25 → Area O open ~February 1.
- 2025: Federal closure January 21 → Area O open ~January 28 (mid-January pattern consistent with recent years).

Proposal 10 would force a blanket delay to March 7 (or later), eliminating 5-6 weeks of prime fishing time—effectively cutting the season for no benefit. January and February represent two of the three best months for cod harvesting in Area O, with high catch-per-unit-effort due to pre-spawning aggregations. This is not a minor tweak; it’s a de facto closure of the fishery during its most productive period, contradicting the equitable opportunity the proposal claims to promote.

The proposal focuses entirely on the state water GHL fishery and ignores the CV trawl fisheries that catch a larger percentage of cod resource (with much higher bycatch) in the same area at the same time.

3. Substantial Losses in Harvest and Economic Value

Area O state-waters Pacific cod (pot gear) contributes significantly to the Dutch Harbor economy, supporting small-boat fleets, processors, and communities like Unalaska and False Pass. Based on ADFG and NMFS data, the Dutch Harbor Subdistrict accounts for ~60-70% of total Area O GHL harvests (~7,500-8,500 mt annually out of ~12,000-13,000 mt GHL). Exvessel prices for Pacific cod averaged \$0.50-\$0.60/lb (\$1,100-\$1,320/mt) in 2022-2024, despite broader industry challenges.

- Annual Harvest Baseline: ~8,000 mt total for Dutch Harbor Subdistrict (2022: ~7,800 mt; 2023: ~8,200 mt; 2024 preliminary: ~7,500 mt, reflecting a 9% GHL reduction tied to BSAI ABC).
- January-February Contribution: These months typically yield minimally 25-35% of annual catch (2,000-2,800 mt), based on seasonal patterns from ADFG commercial operator reports and NMFS observer data showing peak pot gear landings in winter (e.g., 2022 Saltwater Finfish Report notes ~30% of Area O cod harvested Jan-Feb across gears).
- Estimated Harvest Loss: 2,000-2,500 mt/year (minimally 25-30% of total), assuming the delay shifts effort to less productive spring months with lower abundance and higher operational costs (e.g., weather, fuel).

Economic Impact:

- Direct Exvessel Value Lost: \$2.2-3.3 million annually (2,000-2,500 mt × \$1,100-\$1,320/mt).
- Broader Ripple Effects: Using NMFS economic multipliers for Alaska groundfish (~1.5-2.0 for induced/ indirect impacts), total lost value could exceed \$4-6 million/year, including processor revenues, crew wages (~\$50,000/vessel/season for 50-60 vessels affected), and port fees. This hits small operators hardest—many under-60-foot vessels rely on this early

window for debt payoff and off-season viability—in an industry already reeling from a \$1.8 billion statewide loss (2022-2023 NOAA snapshot).

- In 2022-2023 alone, Area O cod contributed ~\$10-12 million in exvessel value; losing January-February would exacerbate a minimally 20-30% fleet participation drop seen in recent low-stock years.

These losses are avoidable and disproportionate, especially since the BSAI stock remains sustainably managed (2025 assessment: not overfished, below overfishing levels). Curtailments should target data-driven in-season adjustments, not blanket delays.

4. No Positive Benefit for Area M (WGOA)

Critically, no benefit will accrue to Area M from curtailing Area O harvests. GOA and BSAI are managed as entirely separate units under NPFMC plans:

Reducing Area O GHL utilization (e.g., via time/area closures) only underharvests the BSAI TAC, leaving fish in federal waters for larger vessels—not redirecting them to GOA spawning or quotas. The State of Alaska’s GHLs automatically scale with regional ABCs via AFSC/SSC/NPFMC processes, not cross-region transfers. For 2025, GOA TAC rose 14% due to its own survey data rebound, independent of BSAI’s 9% cut. This proposal’s “equitable opportunities” claim is illusory; it harms BS communities without aiding GOA.

Recommendation

Reject Proposal 10. The current parallel-season structure already balances access and conservation, informed by decades of robust science. If migration concerns persist, fund targeted tagging studies through the NPFMC rather than impose economically devastating restrictions. This protects livelihoods in Dutch Harbor while upholding sustainable management.

Thank you for considering this comment.

Sincerely,
Buck Laukitis

Submitted by: Ben Ley

Community of Residence: King Cove

My comments and support for proposal 9 are based off previous fishing experience in the WGOA region and recently published scientific information. Please refer to the attached presentation made by Pete Hulson in September. There are some layers and options here but any way I look at it roughly 50% of the WGOA cod stock is migrating to and from the BS in Jan-Mar. This migration is concentrated through Unimak Pass (per tagging results) where there is significant fishing pressure harvesting "BS quota" at that time. Looking at the possible solutions, WG should see an increase based on 2.9%-6.8% of the surveyed fish in the BS.

The real concern to me is the potential for localized depletion or overfishing from the Area O fleet during this migration. When the WGOA receives an increase in A season TAC based on new understanding of the migrating biomass we will have increased opportunity to harvest more fish. In addition to the WGOA increase the same fish will continue to be harvested in Unimak Pass now increasing the total take of the WGOA stock more than intended. This is an avoidable situation and needs to be addressed.

This may be a preempted move on behalf of the state to protect a stock and area that has struggled since 2018, but one I would encourage and commend. I understand the significance of that area to the fleet and have participated in that fishery many times. I also understand the size of Area O and the options available for opportunity if this area is reserved for preservation.

Submitted by: Ben Ley

Community of Residence: King Cove

I support proposal 5 and 6 as they will provide an opportunity for the local small boat fishing fleet. I believe this will add direct, positive results for the communities in the South Alaska Peninsula as they are historically very dependent on this resource.

South Peninsula has historically proven that it can efficiently harvest its share of the allocation while implementing numerous measures to ensure maximum CPUE and value of the harvest. An initial increase of 10% is not beyond this fleet's capabilities and allows for the proof up approach for further increases.

I ask the board to recognize the challenges in the region and do its part to help create a successful and thriving fishery for all local communities in the South Peninsula.

Submitted by: David Morey

Community of Residence: Homer, AK

I am Captain of the F/V Oracle and have fished the Area O State water fishery since 2015 in the Unimak Pass area. I strongly oppose proposals 9 and 10. Delaying the Area O fishery in Unimak Pass to “align” with WG State water cod fishery would only hurt the BS State fishery without any data to support a “mass migration” that would benefit the fishermen in WG. Millions of pounds of fish and millions of dollars in revenue would be lost for Area O fishermen from coastal communities all over the State. The Unimak Pass area has many cod fisheries happening at the same time. When we typically fish (January 15- March or April) the BS cod trawl fleet, over 60’ pot fleet, Federal CDQ and freezer longliners are all fishing outside of us. Why is it the BS state fishery in this area is through “traditional knowledge” the only one affecting the WG State water cod fishery? These other fleets have much larger quotas and huge catching power but the handful of boats fishing inside 3 miles are severely affecting the WG? BSAI and WG State water GHL’s are derived from their respective Federal quotas. Delaying the start for BS State water in this area will only hurt the BS fleet without a single pound of cod gain to the WG fleet. Thank you for considering my comment. David Morey



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802-1668

September 25, 2025

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The National Marine Fisheries Service, Alaska Region wishes to provide the Alaska Board of Fisheries (Board) with the following information on eight regulatory proposals (1–8) for your consideration during the upcoming meeting in Anchorage, Alaska that could impact State of Alaska and Federal fisheries participants. Andrew Olson from the Alaska Region plans to attend the Board meeting to be available to answer questions concerning our letter.

Sincerely

Jonathan M. Kurland
Regional Administrator



**Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific Cod Interaction
between Federal and State of Alaska Fisheries
Alaska Board of Fisheries Meeting – October 30–31, 2025
National Marine Fisheries Service (NMFS) Comments (Proposals 1–8)**

Proposals 1–8: 5 AAC 28.577 South Alaska Peninsula Area Pacific Cod Management Plan

Potential Issues:

- *Setting a guideline harvest level (GHL) on total allowable catch (TAC) would not allow the North Pacific Fishery Management Council (Council) to adjust TACs to account for the GHL fishery. However, if the GHL was set based on acceptable biological catch (ABC) the Council would be able to accommodate the GHL fishery during the TAC setting process.*
- *NMFS would need notice of any increase/decrease in the State GHL by November 15 in order to correctly set the Gulf of Alaska (GOA) harvest specifications for the following calendar year.*
- *An increase in State GHL fisheries may result in NMFS being unable to open and manage Pacific cod fisheries in Federal waters for sectors who fully utilize their TAC allocation particularly in years of lower Pacific cod abundance.*

Proposals 1–8 seeks to increase the South Alaska Peninsula Area Pacific cod GHL fishery from 30% up to 60% of the Federal Western GOA ABC. Proposal 1 and proposals 4–8 seek to increase the percentage of GHL allocated to the State GHL fishery from the Federal TAC, while proposals 2 and 3 seek to increase the percentage of GHL allocated to the GHL fishery from the Federal ABC. Increasing the GHL will subsequently decrease the Federal TAC of Pacific cod available for harvest in the Western GOA. Setting the GHL as a portion of the TAC will further decrease the Federal TAC.

Currently the State GHL fishery is determined using a percentage of the Federal ABC rather than the TAC. The TAC is the amount allocated to the Federal fishery. Annually, the Council is responsible for recommending TACs that do not exceed the ABC of Pacific cod. Federal TAC is recommended after reducing the ABC to account for the State GHL fisheries. Setting GHLs based on Federal ABCs instead of TACs better accommodates the Council process, result in higher GHLs, and ensure all Pacific cod ABC is allocated to either the GHL or the TAC.

Each August, the Council and NMFS begin developing groundfish harvest specifications for the upcoming and subsequent calendar years. The Scientific and Statistical Committee (SSC) sets final overfishing limits (OFLs) and ABCs and the Council recommends final TACs at the December Council meeting each year. Several proposals contain a provision for a step up in GHL if Pacific cod was fully harvested in the previous year. Any step-ups in the South Alaska Peninsula Area Pacific cod State GHL percentage will require an update in the Federal harvest specification process to ensure Federal TAC plus State GHL does not exceed the Federal ABC as recommended by the SSC. Should the Board adopt any GHL increase from these proposals with a step-up provision, coordination between the Alaska Department of Fish and Game (ADF&G) and NMFS would be essential to ensure NMFS properly accounts for this change during the annual Federal harvest specification process each year. In other GHL fisheries, ADF&G has a provision to inform NMFS by November 15 so that the data is available for this process.

If any of these proposals were adopted, it would result in an overall decrease in the amount of TAC available in the Federal Western GOA Pacific cod fisheries and could constrain Federal fisheries. Harvest of the Federal Pacific cod TAC allocation in the WGOA from 2015 to 2024 has annually averaged 80% in the directed Pacific cod fisheries, and up to 87% when accounting for the incidental catch allowance (ICA). Pot, trawl, and longline gear sectors have historically harvested the majority of their allocations (Table 2). As an example of what the Federal TAC might be under any of these proposals, Table 3 shows the Federal gear allocations of 2025 TAC by season under the varying proposed GHL increases from the status quo of 30% up to 60% of ABC. The proposed percentage increases to the State GHL fisheries from the Federal ABC for Pacific cod could leave small amounts of TAC for the federal fisheries, especially in years with a low Pacific cod biomass. If the federal TAC is too small it may be impossible for NMFS to open and manage the pot and trawl fishery in the A season and the longline fleet in both the A and B seasons. Thus, these fisheries may remain closed to directed fishing and the TACs may only be available as incidental catch in other directed fisheries which could result in unharvested TAC. For example, if the State GHL fishery had been 60% of the Federal ABC for 2025, then the Federal A season TAC for pot gear would have been 666 mt. This is likely not enough TAC to support an orderly A season pot fishery and may have resulted in the fishery being closed for the A season (Table 3). In addition, because no proposal describes a step-down mechanism to reduce the GHL percentage, if the GHL were being consistently underharvested, there would not be a way to increase the federal TAC in future years.

Background on Federal Western GOA Pacific cod management:

For the GOA, the SSC recommends the OFL and ABC for Pacific cod for the entire GOA and the ABC is apportioned to each of the GOA regulatory areas (Western, Central, and Eastern) based on the distribution of trawl survey biomass among each of the areas. Federal TACs are set to account for the State of Alaska's Pacific cod fisheries so that the ABC for Pacific cod is not exceeded. Currently, the South Alaska Peninsula Area State fishery establishes a GHL based on the Federal ABC in the Western GOA (30% of the ABC). Because the Council must ensure that total catch in the Western GOA does not exceed the ABC, the Council determines the Federal TAC by applying the State GHL to the Western GOA ABC, as set by the SSC, and designating the remainder of the ABC as the Federal TAC. After taking into account the state-waters GHL fishery, the TAC is set equal to or less than the remainder of the Pacific cod Federal ABC.

The Western GOA Pacific cod TAC is seasonally allocated among gear and operational sectors where a portion of the annual TAC is apportioned to the A season for hook-and-line, pot, and jig gear from January 1 through June 10, and for trawl gear from January 20 through June 10, and a portion of the annual TAC is apportioned to the B season for jig gear from June 10 through December 31, for hook-and-line and pot gear from September 1 through December 31, and for trawl gear from September 1 through November 1. In addition to seasonal and gear sector allocations, a portion of the Pacific cod TAC is set aside for each sector as an ICA to account for incidental harvest of Pacific cod needed to support other fisheries in the WGOA (Table 1). Unused Pacific cod in the A season can be rolled over to the B season for each sector. In addition, NMFS has the authority to reallocate unused Pacific cod TAC from one sector to another sector if NMFS has determined that a different sector is more likely to be able to harvest that TAC.

Table 1. The 10-year average (2015–2024) and range, in metric tons, of incidental catch of Pacific cod needed to support other fisheries in the Western GOA for the hook-and-line catcher/processors (HAL C/P), hook-and-line catcher vessels (HAL CV), trawl C/P, and trawl C/V sectors.

	HAL C/P	HAL CV	Trawl C/P	Trawl CV
Average	8.2	168	89	134
Range	1–35	61–504	36–191	53–331

Note: Jig and pot gear are not shown because incidental catch of Pacific cod for these gear groups in other fisheries is zero.

Table 2. 10-year average (2015–2024) of effort, landings, TAC, and harvest of Pacific cod in the Western GOA.

Sector	Vessels	Landings	TAC (lbs)	Harvest (lbs)	% of TAC Harvested
Jig	6	152	440,920	119,048	27%
Pot	14	438	5,577,638	4,102,761	74%
Trawl (C/P and CV)*	15	635	6,029,581	5,601,889	93%
Longline (C/P and CV)*	3	366	1,957,685	1,618,176	83%
Average All Sectors	8	204	3,299,652	2,654,749	80%
Incidental Catch Allowance (ICA) - all sectors				221,000	
Totals Including ICA			3,299,652	2,875,749	87%

*C/P and CV are a combination of those sectors due to confidentiality

Table 3. 2025 Federal Western GOA Pacific cod ABC 8,710 mt, State GHL (30% 2,613 mt State) and Federal TAC (70% 6,097 mt) allocated by sector and season.

			Jig		HAL CV		HAL CP		Trawl CV		Trawl CP		All Pot (CV & CP)	
			3.5%		1.3%		19.1%		37.1%		2.3%		36.7%	
Proposed % of ABC to GHL	State GHL	Federal TAC	A Season	B Season	A Season	B Season	A Season	B Season	A Season	B Season	A Season	B Season	A Season	B Season
30	2,613	6,097	128	85	41	41	641	524	1,856	404	53	88	1,165	1,071
40	3,484	5,226	110	73	35	35	549	449	1,591	346	45	75	999	918
50	4,355	4,355	91	61	29	29	458	374	1,326	289	38	63	832	765
60	5,226	3,484	73	49	23	23	366	299	1,061	231	30	50	666	612

Note: A season occurs for hook-and-line, pot, and jig gear from January 1 through June 10, and for trawl gear from January 20 through June 10. B season for jig gear from June 10 through December 31, for hook-and-line and pot gear from September 1 through December 31, and for trawl gear from September 1 through November 1.

Submitted by: Peter Neaton

Community of Residence: Homer

Dear Members of the Alaska Board of Fisheries,

I am an owner/operator in the Area O pot cod fishery and have participated in the fishery since its inception in 2014. I respectfully submit my opposition to Proposal 9. This proposed regulation would severely restrict access to the most productive fishing grounds available to the Area O fleet, threatening the economic viability of our operations. I urge the Board to consider that Proposal 9 lacks a foundation in scientific evidence or long-term survey data. Instead, it appears driven by perceptions of competition from neighboring South Alaska Peninsula stakeholders who believe Area O is intercepting their fish stock. However, there is no clear evidence to support this claim. Implementing this proposal would likely cripple the Area O fleet without providing measurable benefits to the South Alaska Peninsula fishery. To ensure sustainable and equitable management of Alaska's fisheries, I respectfully request that the Board reject Proposal 9 and prioritize decisions grounded in robust scientific data.

I also oppose Proposal 10. The current structure for the opening of the fishery works well for the fleet and the processors. Thank you for your time and consideration.

Sincerely,
Peter Neaton

Patrick O'Donnell

F/V Caravelle and Golden West Fisheries, Inc
 PO Box 3075
 Kodiak, Alaska 99615

October 15, 2025

Alaska Board of Fisheries
 Board Support Section
 ATTN: BOF Comments
 P.O. Box 115526
 Juneau, AK 99811-5526

Submitted via online portal

My name is Paddy O'Donnell. I have lived in Kodiak for over 35 years and own an 85-foot trawler that participates in the Western Gulf of Alaska (WGOA) Pacific cod federal fisheries. My boat does not qualify to participate in the state South Alaska Peninsula Area Pacific cod fishery.

I am opposed to Proposals 1, 2, 3, 4, 5, 6, 7, 8

If any of these proposals are approved it will take fish from the federal TAC. Removing cod from the federal fisheries and moving it in to the state water fisheries will negatively impact my business, as well as many other fishing businesses in Kodiak that employ many crew members and support many Kodiak families.

Proponents of these changes already have much more opportunity to harvest cod than I do as they participate in the parallel cod fishery, and can also participate in the state water cod fishery. All of the Kodiak trawlers, who have a long history of fishing in the Western Gulf, can only participate in the federal fishery since we cannot fish in state waters or in the South Alaska Peninsula Area state fishery.

In 2024 there were only 9 pot vessels and 10 jig vessels that participated in this state cod fishery (Tables 3 and 4 in RC 2). In 2024 there were 26 catcher-vessels that participated in the federal WGOA cod fishery. On the federal side different fishing sectors receive separate allocations of cod, and Table 5 in RC shows the current allocations by sector.

Table 5 in RC 2 shows current sector allocations for Western Gulf of Alaska federal Pacific cod:

WGOA federal Pacific Cod Sector	2025 TAC allocation (%)	2025 TAC allocation (pounds)
Jig	3.5%	470,451
Longline catcher processor	19.8%	2,568,257
Longline catcher vessel	1.4%	181,594
Trawl catcher vessel	38.4%	4,980,862
Trawl catcher processor	2.4%	311,304
Pot	38.0%	4,928,978
Total		13,441,446

O'Donnell letter to Alaska BOF

October 15, 2025

Page 2 of 2

As you can see from the table above trawl is allocated 38.4% and pot is allocated 38% in the federal fishery. However, trawl cannot participate in the state water cod fishery, which totaled 5,760,620 pounds in 2025 (Table 2 in RC 2), while under-58 foot pot boats can access 85% of this amount (4,896,527 pounds). This means vessels under 58 feet using pot gear already have the ability to harvest almost 10 million pounds between the state and federal fisheries. The state GHL, which is 30% of the federal TAC, is more cod than is allocated to either the pot sector or the trawl sector in the federal fishery.

Table 3 in RC 2 shows that in 2024 nine pot vessels participated in the GHL state water cod fishery, with exvessel revenue was \$1,390,794. This equates to an average vessel gross of \$154,532.00 per vessel. In 2025 you had 20 vessels participate in the GHL state water fishery, with total exvessel revenue of \$1,659,258 and an average per vessel gross of \$82,962.

Historically, there have been as many as 65 vessels participating in this state cod fishery, and if as many boats start participating again the per-vessel revenue will plummet. For example, if you divide 2025 gross earnings by 65 vessels you would have an average of \$25,527 per vessel. At the same time the corresponding decrease in federal TAC will hurt the 26-65 vessels that traditionally participated in the WGOA federal fishery.

These proposals to increase the GHL allocation will hurt businesses such as mine, and a lot of other boats in Kodiak, and disproportionately benefit pot vessels in the South Alaska Peninsula area.

Sincerely,



Patrick O'Donnell

F/V Caravelle and Golden West Fisheries, Inc

Submitted by: Carl Sholl

Community of Residence: Kodiak

To whom it may concern,

I'm writing in opposition of proposals one through eight for the alaska south Peninsula.

My name is carl sholl and I am a lifelong Kodiak Island resident born and raised. I've grown up in the fishing industry doing everything from crab cod, salmon Long lining to trawling. I've participated in most all the cod fisheries in the state of Alaska from Central gulf, Western gulf to the Bering Sea. In both federal and state Waters over the last 20 years. I have been working on a vessel that participates in the federal cod fishery in the 610 district for nearly a decade and I would like to VOTE NO on the proposal to move federal quota to the state water quota. I understand the hardships that members of the community of the east Aleutian Burroughs are claiming and it's not much different from what other fisheries where experiencing with the shutdown of the federal fisheries and state fisheries around in the gulf in years past. But as a local Alaskan resident that participates in the 610 federal cod fishery I as well rely on the income from that quota. Also the vessel I'm employed on spends money in these communities while participating in the federal 610 fishery in the forms of fuel, groceries, parts and moorage.

I don't see it as very conducive or responsible to take quota from a vast federal statistical area and multiple user gear types and place it inside 3 miles and reducing the access of the user groups to that quota. It is from my experience with most vessels that participate in the 610 statistical area have the ability to Fish federal Waters utilizing different gear types in my opinion. Therefore taking quota from the federal fishery and moving it inside 3 miles would remove income from other local Alaskans and reduce users that rely on the quota that participate in this fishery.

I don't believe the mentality of taking from thee and giving to me is beneficial to anybody in the long run. I would also question the science to know if it is sustainable for that amount of fish to be taken out of just the state waters alone in the long run. I would like to thank the board for taking the time to hear my testimony and again cast a no vote to the proposal. From the crew of the f/v sea Mac and our local coastal community participants.

Submitted by: Donald Sitton

F/v Sea Mac

Community of Residence: Kodiak

I don't support the eleven proposals for the following reasons,myself,my crew, families,owners and community,including the coastal communities all benefit from our participation in this fishery,we have been involved in this fisheries for decades,the participants proposing the reallocation have both trawl

and pot endorsement,taking from a vast federal area from multiple users to a smaller area inside three miles will have a impact not only on the environment,but also all stocks of cod,crab,ect.we are all feeling the effects of the quotas equally,and taking from one group from a federal area is a injustice to those involved in the fishery,I vote no on the eleven proposals, I thank the board of fish for listening to my testimony.Don Sitton

PC19

Submitted by: Micheal Spokas

Community of Residence: Dutch Harbor 8 months a year

I am the Captain of the F/V St. Paul, I have been fishing Unimak pass since 1992, Captain since 1999 and i strongly oppose proposals 9 and 10. These are ludicrous, greed driven proposals. Why are the under 60s targeted when every other gear type is fishing the BSAI at the same time. Our effort is minimal compared to the constant pounding of trawlers off Cape Sarichef during A and B season. Over 60 pot fleet and the Freezer longliners all fish the Unimak Pass area. The proposals, if enacted, would have huge economic implications to the crews and owners of the U60 fleet, not to mention the substantial loss revenue to the local canneries. How about a current tagging program over 5 years and cost benefit analysis on the economic impact?

I will end with stating again that I, Mike Spokas, Stongly oppose proposals 9 and 10.

PC20

Submitted by: Richard Starr

Community of Residence: Kodiak

I am writing to express my strong opposition to the proposal to move a portion of the federal Pacific cod quota to the state-waters Guideline Harvest Level (GHL) in the 610 district. This proposed reallocation would have serious and negative consequences for the stability and fairness of this fishery and for the communities, skippers, and crews who depend on it.

Increasing the GHL will not increase the overall cod population; it will only concentrate a larger share of fishing effort into a smaller area. This increased concentration could intensify localized depletion and further stress both the resource and the fishermen who rely on balanced access to it.

Additionally, reallocating quota based on a single year's harvest outcome is not a sound management approach. Every year is different in terms of conditions, markets, and which participants are able to catch the available quota. Basing a long-term reallocation on one year's results fails to account for the natural variability of this fishery and undermines the long-term stability that fishermen depend on.

It is also important to recognize that the federal allocation supports a diverse group of users employing multiple gear types. Reducing the federal portion of the quota would negatively impact this broad range of participants, many of whom do not have access to state-waters fisheries. Meanwhile, those who would benefit from an increased state allocation already hold federal permits that allow them to participate in both fisheries. In other words, this proposal would advantage a narrow subset of fishermen at the expense of others who have equal stake and history in the fishery.

For these reasons, I urge you to reject the proposal to shift quota from the federal fishery to the state-waters GHL in the 610 district. Maintaining the current allocation balance is essential to protecting the health of the fishery, the fairness of access, and the livelihoods of the many Alaskans who depend on it.

Thank you for your consideration

PC21

Submitted by: Robert Start

Community of Residence: Anchorage

Dear Members of the Alaska Board of Fisheries:

I am writing to express my strong opposition to the proposals to move a portion of the federal Pacific cod quota to the state-waters Guideline Harvest Level (GHL) in the 610 district.

My name is Robert Starr, and I have been a commercial fisherman in Alaska since 1988. Fishing out of Kodiak has been my sole source of income for nearly four decades. Throughout my career, I have participated in multiple fisheries, including pot fishing, longlining, and trawling. Like many others in our coastal communities, my livelihood, and that of my crews', depends on fair and stable management of our fisheries.

Increasing the state GHL will not increase the cod population; it will simply concentrate a larger portion of the harvest into a smaller area. This shift would intensify fishing pressure in localized zones, creating greater strain on both the resource and the fishermen who depend on it for their livelihood.

Additionally, reallocating fish between federal and state management based on the outcome of a single year is not sound fisheries management. Each year is different in terms of weather, conditions, market demand, and who is able to catch their share of the available quota. Using one year's data to justify permanent reallocation undermines long-term balance and fairness.

The federal allocation also supports a wide variety of participants using multiple gear types. Reducing that allocation would negatively impact many fishermen who do not have access to state-waters fisheries. At the same time, those who would benefit from an increased state allocation already hold

federal permits that allow them to fish in both areas. This proposal would therefore benefit a limited group at the expense of others who have just as much history and investment in the fishery.

For these reasons, I urge the Alaska Board of Fisheries to reject the proposals to move quota from the federal Pacific cod fishery to the state-waters GHL in the 610 district. Maintaining the current allocation is essential to ensuring fairness, sustainability, and economic stability for fishermen across Alaska.

Thank you for your time and consideration.

Sincerely,

Robert Starr



UNDER SIXTY COD HARVESTERS

October 10, 2025

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

Re: Pacific Cod Proposals 9–11

Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries:

The Under Sixty Cod Harvesters is a member organization representing fixed-gear vessels participating in the Pacific cod fisheries of the Bering Sea, Aleutian Islands, and Gulf of Alaska. Our members are longtime participants in and supporters of state-waters fisheries. We appreciate the opportunity to comment on the Pacific cod proposals under consideration. Our positions are as follows:

Proposals 1–8: Neutral

Proposal 9: Oppose

Proposal 10: Oppose

Proposal 11: Support

Proposals 1–8: Neutral

Our members are supportive of statewater fisheries and their many merits, and participate in both state and federal Pacific cod opportunities. However, we do not have a formal position on these proposals.

Proposal 9: Oppose

Proposal 9 would establish new closed waters around Unimak Pass during the Dutch Harbor Subdistrict (Area O) and South Alaska Peninsula (Area M) state-waters Pacific cod seasons. While framed as a way to “protect migration corridors” and “promote equity,” the measure is scientifically and logistically unsound, and would effectively shut down some of the most productive Area O fishing grounds without delivering additional conservation or access benefits. The Western Gulf of Alaska GHL has also been fully harvested in 28 of its 29 years in existence, which fails to indicate that localized migration is depleting fishing opportunity and efficiency.

The Bering Sea/Aleutian Islands (BSAI) and Gulf of Alaska (GOA) cod stocks are managed as separate populations under independent North Pacific Fishery Management Council plans. Meaning, the BSAI Acceptable Biological Catch (ABC) is set and apportioned based on the Bering Sea stock assessment and management plan, entirely separate from the GOA. Similarly, the State of Alaska manages groundfish on a regional basis, recognizing the distinction between the two marine systems. Recent research¹ continues to affirm significant genetic differentiation between these stocks, and validates this practice of managing them separately. While some Pacific cod tagging studies show seasonal migrations within and between Bering Sea

¹ Drinan et al. 2018; Spies et al. 2019

and Gulf regions, they also show that Pacific cod are generally spawning and then traveling north toward summer foraging² at this time, and little evidence exists of any large-scale migrations that warrant cross-over management. This makes drastic area closures as an attempt to increase access in a different region doubly concerning because 1) there is no management mechanism to link a closure in the Bering Sea to increased quota in the Gulf, nor is there any indication that such a mechanism would be biologically appropriate; and 2) we lack any actionable evidence that a meaningful number of Pacific cod would choose to travel south at that time and be available for harvest by Gulf fleets in either the short- or long-term.

In terms of the impacts to the Dutch Harbor fishery, negative outcomes would be immediate and severe. The proposed closure areas would remove a significant portion of current Area O harvest grounds, including the core “Cod Alley” region where pre-spawning fish aggregate. As ADFG staff comments highlight³ more than 70% of the annual DHS GHF is harvested in the combined proposed closure areas. Redistributing that effort would result in decreased productivity affecting both harvesters and processors, longer seasons, and significantly increased expense to the fleet. For some vessels already operating on close margins, these additional fuel, crew and operational costs would hamper if not prevent participation in the fishery.

For these reasons, the Under Sixty Cod Harvesters oppose Proposal 9. It would have substantial negative impacts to harvesters as well as coastal communities like Unalaska and False Pass (both of which process Area O cod) without yielding benefits elsewhere.

Proposal 10: Oppose

Proposal 10 would delay the Dutch Harbor Subdistrict pot-gear opening until seven days after the federal under-60-foot pot/longline season closes *or* March 7, whichever is later. Although intended to “align seasons” for fairness between the BSAI and GOA, the proposal misinterprets how these fisheries are structured and would inflict serious economic harm on portions of the under 60 fleet.

As discussed in the previous section, BSAI and GOA cod fisheries are biologically and administratively distinct. Delaying Area O’s opening cannot enhance GOA spawning or quota opportunities because the two regions’ harvest levels are determined independently by separate plan teams and stock assessments. Any purported benefit to western GOA stocks is based on an unverifiable set of assumptions for which there is no onramp into actual TAC setting.

Operationally, a March 7 start would erase the fishery’s most productive window. Over the last several years, Area O has typically opened in late January following the federal closure, when cod aggregate nearshore and catch rates are highest. January–February landings can account for roughly one-quarter of the fleet’s annual income; losing this period would cut 25–30 percent of harvest opportunity. The fleet cannot simply “fish later”—processing slows and quality declines after April, when cod move offshore. The earlier months when fish are aggregated are critical for efficiency and seasonal income security. Additionally, making best use of January through April, rather than the later window alone, allows for a focus on quality and supply chain stability. Cod quality is notably higher in the earlier portions of the season, and truncating this optimum harvest time curtails important efforts underway to increase quality output and access higher value markets.

² December 2024 Ecosystem Status Report (ESR) for the Eastern Bering Sea. North Pacific Fishery Management Council

³ Alaska Department of Fish and Game, page 28. (2025, October 2). *Staff comments on Pacific cod proposals*.

As Alaska increasingly competes with evolving global whitefish markets that have highly prioritized quality innovation, we cannot afford to go backwards on the harvest and processing of cod at peak quality.

Current state fishery timing already complements federal timing while maintaining conservation integrity. We urge the Board to reject Proposal 10 and preserve the proven season structure that supports both sustainable harvest and viable community economies.

In terms of both proposals 9 and 10, and discussion around purported benefits to the Western GOA Pacific cod stock, it's important to look at recent changes in the region. GOA cod experienced a drastic decline between 2013 and 2017, when the biomass dropped by 79%⁴, and triggered fishing closures across the region. The crash was primarily attributed to the marine heatwave, aka “the blob”, a mass of warm water that developed in the Gulf from 2014-2016. Researchers believe warmer conditions accelerated metabolism in juvenile cod, while simultaneously decreasing prey availability and fat content, leading to a substantial mortality event for juvenile cod. Since that time, cod stocks have been gradually rebuilding. The foundation of rebuilding cod stocks in the Gulf of Alaska is and will continue to be ongoing study of this genetically distinct biomass, and appropriate Gulf catch limits that reflect the strength of the biomass and its evolving ecological stressors. We believe strongly that the federal and state mechanisms in place are already well suited to achieve that standard, and have already led to the gradual increase in Gulf cod access over the last several years. Our members have also consistently reported increased cod numbers in the Gulf. We believe the best way to increase harvest opportunity in the Gulf in the near term is to advocate for increased frequency of stock surveys, coupled with proactive engagement in the groundfish plan team and well established TAC setting process.

Proposal 11: Support

Proposal 11 would close state waters west of 170° W longitude to commercial groundfish trawling in order to protect golden king crab habitat and reduce benthic impacts. The Under Sixty Cod Harvesters support this proposal. We recognize that healthy benthic habitats underpin the productivity of all bottom-associated species—cod, crab, and others. Trawl expansion into sensitive Aleutian Islands areas has raised valid concerns about contact with crab concentrations, female and juvenile habitat refugia, and long-recovery benthic communities. A precautionary closure west of 170° W provides reasonable protection for these habitats, and is consistent with long-standing state management practices. We commend the proponent's focus on habitat and crab conservation and support continued scientific review of trawl distribution, bycatch, and habitat effects through both the Alaska Board of Fisheries and federal Council processes.

Thank you for considering our comments.

Sincerely,



Hannah Heimbuch, Director
Under Sixty Cod Harvesters

⁴ P. G. von Szalay & N. W. Raring, *Data Report: 2017 Gulf of Alaska Bottom Trawl Survey*, NOAA Tech. Memo. NMFS-AFSC 374 (2018)