

RC 12

Alaska Board of Fish Re: Pacific Cod for PWS, Cook Inlet, Kodiak, Chignik, and South Alaska Peninsula

For the Record - Testimony of Neil Rickman

Mr. Chair and Board Members:

My name is Neil Rickman and I run the 42 foot F/V Christy. I have been a cod jigger for 12 years.

Proposal 3 I support proposal 3. A 48 hour wait period before the state's jig season begins and also before the federal B season begins is better than the current 7 day waiting period. I am also in favor of a triggered, concurrent season, a federal season that overlaps the state season. With this option the jig fleet will be able to fish outside of three miles in a low effort /low harvest year. Ultimately a triggered reverse parallel season is the preferred option. The jig fleet would be less likely to strand fish in the state season under this option.

Proposal 4 I support proposal 4. Every year the jig fleet sweats closure of the state pot season in Kodiak. This proposal will fairly divorce the two allocations giving the jig fleet their full allocation without worry of a pot fleet overage.

Proposal 5 I support proposal 5. Under new rules being considered, a reverse parallel jig season will be more difficult to monitor if vessels are allowed to retain gear other than jig gear on board. This proposal would be easier to enforce than our current regulations.

Proposal 6 I support proposal 6. The state water jig season I believe was set up as a small boat/entry level fishery. The larger boats greater than 57 feet have historically caught an average of 5% per year since the state season was first implemented. This proposal would give the large boats more quota than the average and at the same time insure that the fishery remain a small boat fishery.

Proposal 7 I do not support proposal 7. The 25% cap for boats greater than 57 feet would be a 400% increase of the large boats' historical catch. While it is not certain that big boats will increase their participation in the jig fleet, it is well documented that any given set of rules in a fishery will be exploited to the maximum given enough time. Let's keep this a small boat fishery.

I appreciate this opportunity to share my thoughts on these important issues. I request that I please be included on the committee deliberating these proposals.

Thank you.

Neil Rickman

Dated _____

Arthur Schultz
3580 Sitkinak Dr
Kodiak AK 99615

RC13

Alaska Board of Fish
Re: Pacific cod for PWS, Cook Inlet, Kodiak, Chignik, and S. AK Peninsula
October 6-10, 2011

Chair and Board,

My name is Art Schultz and I own and operate the 48 foot jigging vessel Lindsey Marie.

Proposal 3: I support the Kodiak ADF&G advisory committee proposal to open state waters jig season 48 hours after the close of Federal A season. I know of no good reason to delay the start of the state season, and the ADF&G biologist at the most recent advisory committee meeting indicated that this proposal would be feasible from a management perspective.

Regarding the problem of "stranded quota," I recognize the problems inherent in differing management schemes. For the time being I support the status quo, with a firm opening date of March 15 for state waters. In the future though, as a way of alleviating the stranding problem in years of low effort/abundance, I urge the BOF to move toward an option of concurrent state/Federal openings. Such a concurrent state/Federal option would be at the discretion of Westward region ADF&G management.

As a long time cod fisherman, I have seen with painful clarity that in some years the cod may not be inshore, despite good fishing past three miles. A concurrent state/Federal scheme would help avoid stranded quota by giving the jig fleet the flexibility to harvest where the fish are most cooperative in different seasons.

Proposal 4: I support firm, separate allocations for jig and pot gear. While there has been a separation on paper for some time, in reality pot boats tend to be bigger, able to fish in heavier weather earlier in the year, and in good fishing years they've been able to harvest a portion of the jig allocation before being closed. The overage has been coming out of the jig quota. This situation is quite unfair.

Proposal 6: I support this proposal to limit participation by larger vessels. Larger and heavier vessels have been entering the Kodiak jig fishery recently. The jig fishery has historically been composed to smaller vessels more limited by capacity and weather than these new larger entrants. These larger vessels already tend to have multiple opportunities to work in other fisheries, and indeed many of them are already participants in other sectors of the Pacific cod fishery. The influx of these vessels does not properly represent the intent of state and Federal management to provide entry level opportunities.

Proposal 7: I do not support this proposal. I realize that there are long time participants in the Kodiak jig fishery that are 58 feet or longer, but a limit of 25% provides an incentive for larger and more diversified vessels with far more fishing opportunities to move into the jig fishery. Proposal 6, capping larger vessels at 10%, already provides for an increase over the historical average catch by the 58 foot+ participants in this fishery.

**North Pacific Fishery Management Council motion
D-2 Staff Tasking agenda item, action taken October 4, 2011**

Comments to the Board of Fisheries regarding GOA Pacific cod meeting (October 6-10) proposals:

The Council recognizes that the National Marine Fisheries Service (NMFS) proposed rule regarding the Pacific cod sector split has provided maximum flexibility to the Board of Fisheries (board) in adjusting their state GHL and parallel cod fisheries.

In taking final action on the sector split, the Council supported providing increased opportunity to the jig fleet and considered that fishery as the primary tool for the Council and the board to provide true entry level opportunity.

The Council requests the board to consider these goals during their deliberations on their proposals before them. The Council recognizes that the board will be balancing these goals with the desire of the board to fully harvest state managed GHs and address state management considerations of the effects of the sector split.

The Council further recommends that board considerations at this October meeting for the jig fishery in 2012 be focused on state water considerations relative to the NMFS proposed rule and any longer term solutions be a separate discussion, following a joint protocol meeting on Pacific cod fisheries, a time when the board chooses.

The Council further requests the board to consider options that will provide jig opportunity concurrently in state and federal waters when the regulations allow and the board and state managers find it implementable.

Comment on Prince William Sound proposal 34:

The Council requested their Executive Director draft a letter requesting that the board consider adjusting the opening date for longline gear in the state Prince William Sound Pacific cod GHL season to be no earlier than the opening date for the commercial IFQ halibut fishery in order to minimize halibut bycatch in the fishery.

RC 15

Alaska Board of Fish
RE: Pacific Cod for PWS, Cook Inlet, Kodiak, Chignik, and South Alaska Peninsula
Coast International Inn, Anchorage Alaska
Oct. 6-10, 2011

For the Record: Testimony of Darius Kasprzak

Mr. Chair and Board Members,

My name is Darius Kasprzak, and I own and operate the Kodiak ported 46 foot jig vessel FV Marona. I am president of the Alaska Jig Association (AJA), whom I am representing.

PROPOSAL 3: We support placeholder proposal 3. Representatives of the Kodiak jig fleet including myself have repeatedly testified before the North Pacific Fishery Management Council (NPFMC) for almost 4 years now advocating for an Federal non-historical jig allocation set aside with step-up provisions to mesh with our State jig fishery. Our goal is and has been to maximize opportunity for our jig fleet while minimizing stranded fish in either the State or Federal jig fisheries.

We support Kodiak Fish and Game Advisory Committee action to promote a State jig season opening 48 hrs after the close of Federal A season, and also the close of State season 48 hrs prior to the start of Federal B season to occur on a date certain of June 10.

In the short term, we advocate a fishery management structure of status quo, with an option for triggered concurrent seasons. That is to say, a Federal offshore (outside 3 miles) jig fishery could exist concurrently with an open inshore (inside 3 miles) State season only when local ADFG management institutes it at their discretion through emergency order during years of low jig effort and/or harvest, when cod biomasses reside largely offshore. This will provide jiggers maximum offshore capability during the spring post spawn period when fish are feeding heavily, daylight hours are lengthening, and weather is improving.

In the long term, we prefer and endorse a status quo fishery with a triggered reverse parallel State fishery. This means that local ADFG management could, during years of low jig effort and/or harvest and at their discretion through emergency order, institute a reverse parallel fishery where fish caught in Federal waters outside 3 miles could accrue to the State jig guideline harvest level (GHL) quota. We prefer this alternative in the long run as it remains our best option to avoid stranding State water quota fish as we step up and increase our Federal set aside jig quota.

Jig representatives including myself as well as NPFMC members and staff have been working for several years towards making a reverse parallel jig fishery a reality. We realize that surmountable complications may exist in precisely dovetailing a State jig reverse parallel fishery with Federal guidelines and regulations, even as we fully support the concept as our ultimate desired jig fishery management structure.

Specifically, we respectfully ask that the BOF to write a letter to the NPFMC as soon as practicable identifying the reverse parallel jig fishery as our preferred alternative and requesting further cooperation and coordination in finalizing such.

PROPOSAL 4: We support this proposal, and we advocate the Kodiak Fish and Game Advisory Committee's action to support divorcing the state jig/pot GHL allocations. This will provide security to the State water jig fleet, which has repeatedly lost fishing opportunity due to the pot sector exceeding their GHL allocation and thus dipping into the jig sector's GHL allocation to compensate.

PROPOSAL 5: We support this proposal. However, at our last AJA meeting, we voted to amend the language under section (g) to read with the following underlined additions (i.e., no deployable pot , trawl, or longline gear, as well as longline reels, allowed onboard). While this action may disenfranchise a minority of jig vessels that anchor with their longline reels, the majority of AJA members contend that it is in the best overall interest of the jig fleet to eliminate to the greatest extent possible incentives to cheat by jig registered vessels who are also fully rigged to longline.

PROPOSAL 6: We support this proposal. The majority of AJA members maintain that the historically small vessel contingent of the jig fleet needs to be protected from a continued influx of larger, heavy weather capable vessels entering the State jig fishery. Most of the larger jig vessels have multiple fishing opportunities throughout the year (such as participating in limited license program (LLP) Federal ground fish fisheries with other gear types, rationalized individual fishing quota (IFQ) halibut/sablefish fishing, IFQ or limited entry crab fishing, tendering, etc.) whereas many of the historically smaller jig vessels remain strictly entry level with little additional opportunity.

PROPOSAL 7: AJA does not support this proposal, maintaining that a over 58 foot jig vessel allocation cap of 25% is set too high.

Thank you for time and consideration of these issues. I request to please be included on the committee deliberating these proposals.

Sincerely,
Darius Kasprzak


President, Alaska Jig Association