



May 18, 2015

Dear Chairman Kluberton;

I support changing the meeting date for Pacific cod proposals to the November 30, 2015 meeting. The statewater pcod fishery is very important to state residents, and we appreciate being able to participate in the meetings. A meeting in November and December allows fishermen who fish statewater pcod to participate in the Board of Fish process. If the meeting is held in February fishermen usually are already fishing or preparing to fish.

Thank you for considering this request.

Sincerely,

Buck Laukitis

59065 Meadow Ln.

Homer, Ak 99603

907-299-0112



May 19, 2015

Dear Chairman Kluberton,

I am in favor of discussing the Pacific cod proposals at the November-December 2015 meeting. Pacific cod, in particular the state water fishery, is a major portion of my income as a fisherman. If the meeting is in November/December I am able to attend and participate. February is the peak of our fishery, and those with the voices that matter will be out fishing. Thank you for considering this request.

Sincerely,

A handwritten signature in cursive script that reads "Peter Neaton".

Peter Neaton
59065 Meadow Lane
Homer, AK 99603
907-359-2332



P.O. BOX 162 UNALASKA, AK 99685

May 20, 2015

Glen Haight
Alaska Board of Fisheries Executive Director
Fish and Game Board Support
P.O. Box 115526
Juneau, AK 99811-5526

Subject: Moving the Board of Fisheries meeting Pacific Cod related proposals from February 23, - March3, 2016 to November 30- December 7, 2015

The Unalaska AC is in unanimous support of the meeting date change, by doing this local area Pacific Cod fishermen will be able to participate at in December. It also ties in well with the start of North Pacific Council meeting which starts on December 9th and is an important meeting where the groundfish total allowable catch amounts are set for the 2016 federal water fisheries. There will be a lot of interest by harvesters and processors to attend both meetings. With the Board of Fisheries meeting change if it is approved it will save a lot of travel dollars for meeting participants.

A handwritten signature in blue ink, appearing to read "Frank Kelty".

Frank Kelty,

Unalaska / Dutch Harbor AC Chairman

CC: Taryn Oconnor Brito, ADFG Board Support



Members of the Board

My name is Matt Giambrone and I am writing in support of moving discussion of Pacific Cod related proposals to the Nov-December meeting. I would like to be involved but it is simply not possible with the current meeting scheduled in what has been the middle of our season.

I have participated in the Dutch Harbor State Waters Pot Cod Fishery for the last two years. This fishery has already become a critical factor in the success of my fishing business and I believe it will be even more important to me in the future given the trend in salmon prices.

Please support moving the meeting so more of us can participate

Thank you,

Matt Giambrone



Members of the Board

My name is Mark Anderson and I have operated a vessel in the Dutch Harbor state water pot cod fishery for the past two years. I am writing to support moving the meeting for pacific cod related issues to the Nov-Dec meetings. This fishery is critical to the success of our vessel and we very much want to be involved in the process. When the meetings are held in February we can not participate because those dates fall right in the middle of our cod season. Please support moving the meetings to a time that we can attend.

Thank you

Mark T Anderson



I am in favor of changing the meeting from February to November.
I fish area O for cod and will be fishing in February. Moving the meeting to November would allow me to attend this important meeting.

Robert Hanson
Fv Stanley K
Pmb 2086
3705 Arctic Blvd
Anchorage AK
99503

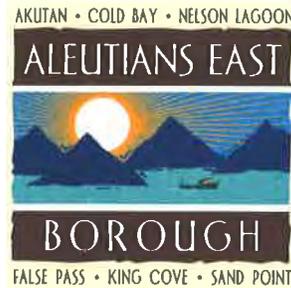


Chairman Kluberton:

As fishery advisor for Lake and Peninsula Borough and speaking on behalf of Chignik cod fishermen we encourage the Board to move the cod proposals to the Nov/Dec meeting

Chuck McCallum

Fishery Advisor, Lake and Peninsula Borough



May 21, 2015

Chairman Tom Kluberton
Alaska Board of Fisheries
Emailed to dfg.bog.comments@alaska.gov

Re: Possible Decision to Consider Changing the Date for Review and Deliberation of Pacific Cod Proposals

Chairman Kluberton,

The Aleutians East Borough supports moving consideration of Pacific cod proposals from the Alaska Peninsula meeting in February and March 2016, to the December 2015 time period, so that ADFG groundfish staff and our local Pacific cod fishermen will be able to participate fully.

This is the same issue we wanted to address in advance of the previous Alaska Peninsula meeting in February-March of 2013, when we submitted ACR 15 for the 2012 Board Work Session. We were pleased that the Board at that time established the October 2013 Statewide Pacific Cod meeting, allowing South Alaska Peninsula Pacific cod fishermen to participate in the meeting.

As you know, many vessels in our local small boat fleet participate in several local state fisheries throughout the year, including salmon fishing in the summer and Tanner crab and Pacific cod in the winter & spring. That means that many of our fishermen will still need to choose: whether to participate in the State Pacific cod fishery or to attend the Alaska Peninsula Board of Fish meeting for salmon issues. We hope in the future that you will consider a fall/winter time period in the Board meeting cycle for all Alaska Peninsula finfish issues, as a solution that will allow full stakeholder participation by fishermen in the Aleutians East Borough.

Thank you for the opportunity to comment in advance of your consideration of this issue.

Sincerely,

Ernest Weiss

Aleutians East Borough
Natural Resources Director



May 22, 2015

Mr. Tom Kluberton, Chairman
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Retain original meeting schedule for p-cod proposals (or move to the March Statewide Finfish meeting)

Dear Mr. Chairman and Members of the Board of Fisheries,

On behalf of the Freezer Longline Coalition (FLC), we request that the Board of Fisheries maintain the original scheduling of the p-cod related proposals for the upcoming meeting cycle. If the BOF chooses to move or consolidate the p-cod proposals into one meeting, we would recommend that the logical meeting for consolidating p-cod proposals from multiple regions would be the Statewide Finfish and Supplemental Issues meeting in March 2016 (currently scheduled for 5 days).

Specifically, we request the BOF to **not** move the p-cod issues to the Bristol Bay meeting (November 30 – December 7) for the following reasons:

- 1.) **BOF meeting conflicts with the NPFMC meeting:** The Bristol Bay meeting (Nov 30-Dec 7) already overlaps with the NPFMC December meeting (Dec 7-15). If the p-cod issues are added to the Bristol Bay meeting, the BOF meeting would likely be extended by two additional days or more (becoming a ten day meeting) and would then overlap the NPFMC meeting by three days or more.

The two week period prior to a Council meeting is when the relevant documents and analyses become available to the public. These analyses are generally very thick and require considerable time to review in order to provide informed public comment in the federal process. The scheduling of groundfish issues in the Bristol Bay meeting will not only conflict with the NPFMC meeting dates but with the public's opportunity to effectively prepare for that same process.

- 2.) **Length of meeting:** The movement of the p-cod issues to the Bristol Bay meeting would make for a 16 day continuous meeting (with three days of overlap) for the public and staff that participate in both regulatory processes (BOF and NPFMC) for groundfish issues. With travel days, this would make for an 18 consecutive day meeting duration. The Groundfish Plan Team also meets for a week in late



November to develop the SAFE¹ documents for each NPFMC groundfish stock. With the combination of the Plan Team (tentative Nov 16-20 or Nov 23-27) BOF Nov 30-Dec 9; NPFMC (Dec 7-15), this would make for 24 meeting days in one month for the staff and public who participate in both federal and state groundfish processes – should the BOF choose to move the p-cod issues to the Bristol Bay meeting.

- 3.) **The Statewide Finfish meeting in March is presently scheduled for five days and does not conflict with any NPFMC meetings.** NPFMC meetings are in December, February, April, June, and October.
- 4.) **A BOF decision regarding p-cod allocations in November will be uninformed as to the potential amounts and impacts as the EBS/GOA/AI p-cod ABCs are not determined until the December NPFMC meeting.** The State of Alaska does not conduct comprehensive surveys and stock assessment of cod stocks in these three areas (EBS/GOA/AI), but relies on the federal stock assessment and harvest specifications process. The annual federal stock assessment process is not concluded until the December NPFMC meeting (i.e. after the Bristol Bay meeting). Should the BOF decide to take up p-cod issues in November (before the conclusion of the Dec NPFMC meeting), the BOF will not be informed as to actual stock status and potential impacts of the Board's decisions. There exists a large potential range of p-cod ABCs in the Eastern Bering Sea and the Aleutian Islands due to considerable uncertainty in cod models.
- 5.) **There currently exists a large amount of uncertainty regarding p-cod modeling (and resulting ABCs) in all three areas (EBS/GOA/AI) that will not be resolved until the December NPFMC meeting.** The p-cod models produce an ABC (allowable biological catch) and OFL (over-fishing level) that is incorporated into the final selection at the December meeting. Due to the large amount of uncertainty regarding cod modeling, the Groundfish Plan Team for the NPFMC has convened a special BSAI/GOA Joint Team Subcommittee on Pacific Cod Models. The joint team recommendations came out May 11, 2015 (see attached table of recommendations) and will be reviewed at the June NPFMC meeting by the SSC (Science and Statistics Committee)

The p-cod stock assessment authors will address these recommendations from the SSC/Joint Team for the October and November Plan Team meetings. However, the ultimate selection of the model and ABC/OFL will not be made until the December 2015 NPFMC meeting by the SSC and NPFMC.

EBS cod model: There is a wide disparity between the two EBS p-cod models output. For example, in 2015, the result from Model 0 (status quo model) was an ABC of 295,000 mt. The output from Model 2 (new model) was 112,000 mt (or – 62% less). This is a difference of 183,000 mt. In 2015, due to reservations with Model 2, the stock assessment author selected Model 0 but recommended a precautionary ABC of 255,000 mt (rollover from previous year) due to retrospective fit concerns with Model 0. This recommendation was adopted by the SSC and NPFMC. The Joint Team has since recommended the author continue to work on four models (Model 0 and three versions of Model 2) as well as

¹ Stock Assessment and Fishery Evaluation

discretionary consideration of 8 other model configurations. The Joint Team recommended 4 non-model analyses.



Aleutian Islands cod model: The non-age structured Tier 5 model in 2015 for AI p-cod resulted in an ABC of 17,600 mt. The age-structured Tier 3 models (two are still under development) resulted in ABCs of 29,300 and 33,400 mt (or twice the Tier 5 model). The more conservative Tier 5 model was recommended and ultimately adopted by the SSC and NPFMC in 2015 (along with a recommendation for continued work on the Tier 3 models). The Joint Team has since recommended additional work on two models and discretionary work on two additional model configurations as well as two non-model analyses.

GOA p-cod model: There is less uncertainty between the two models and the model with the better data fit was selected in 2015. The Joint Team has recommended author continue work on the two models as well as an additional discretionary model and one non-model analyses.

The FLC represents owners and operators of over 30 U.S.-flag vessels that participate in the hook-and-line CP, or freezer longline sector of the Pacific cod fishery in the Bering Sea and Aleutian Islands (BSAI). The freezer longline fleet is almost completely reliant on p-cod and have few alternative fisheries. FLC member companies are the pioneers of the freezer longline sector in Alaska and have over 30 years of history fishing for p-cod in the North Pacific. FLC members are based across Alaska and Washington and offload their harvests in Alaska ports, predominantly Dutch Harbor. Five member companies are based in Alaska. The freezer longline fleet generates over \$160 million in revenues annually and employees over 1200 full-time workers in Alaska and Washington.

The timing of a BOF decision regarding p-cod in November (prior to the December NPFMC meeting) will ensure that the decision will not be well informed regarding p-cod stock status, ABC/TAC, and potential impacts of changes in allocation. Given the large uncertainty and variance with p-cod models (that would be not be resolved by November), moving p-cod proposals to the November BOF does not appear to be a wise course of action.

Given the meeting conflicts and overlap; combined lengths of meeting; and the mistiming with the stock assessment and harvest specification process, we request that the BOF **not** move the p-cod issues to the November 2015 BOF meeting but instead consider moving the p-cod issues to the March 2016 BOF meeting.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. See".

Chad I. See
Executive Director
Freezer Longline Coalition



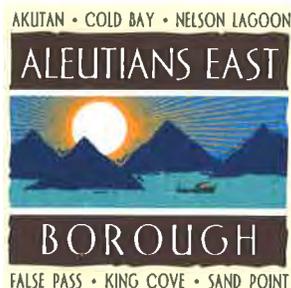
2303 West Commodore Way
Suite 202
Seattle, WA 98199
Office Phone 206-284-2522
Cellular Phone 202-487-3562
Fax 206-284-2902
chadisee@freezerlongline.biz



Table 1. Paraphrased proposals (see Appendix 1) and assignment thereof to candidate models and non-model analyses, as recommended by the subcommittee. M = model, SPM = starting point model (i.e., the model addressed by the respective proposal), D = author's discretion.

List of proposed models				September model							
Region	Proposal	SPM	Brief description of proposal	0	1	2	3	4	5	6	D
EBS	none	2011 M3b	No changes	x	n/a						
EBS	none	2014 M1	No changes (note that 2014 M1 is identical to 2011 M3b)	x	n/a						
EBS	BPT1	2014 M2	No changes		n/a	x					
EBS	SSC2	2014 M1	Use iterative re-weighting or the approach of Francis (2011) for composition data (see also MM5)		n/a						x
EBS	MM2	2014 M1	Age-specific natural mortality (estimated and fixed)		n/a						
EBS	MM3	2014 M1	Include more initial age devs		n/a						x
EBS	MM4	2014 M1	Fit a smooth curve to the survey abundance index data to estimate the CV		n/a						x
EBS	MM5	2014 M1	Run the model with Francis weighting for composition data		n/a						x
EBS	MM6	2014 M1	Run the model with empirical sd's for composition data and time varying commercial selectivity		n/a						x
EBS	MM7	2014 M1	Split out age 1 and 2 based on length and model as separate surveys		n/a						
EBS	MM8	2014 M1	Time varying growth		n/a						x
EBS	MM9	2014 M1	Richards growth curve		n/a						x
EBS	new	2014 M2	Iterative re-weighting, Francis (2011), or harmonic mean for comp. data; turn off time-varying Q				x				
EBS	new	2014 M2	Do not use internal estimate of σ_R					x			
EBS	new	2014 M2	Include more initial age devs					x			
EBS	new	2014 M2	Initialize the composition weighting process by setting sample sizes equal to number of sampled hauls								x
EBS	new	2014 M2	Compare process error versus observation error weightings								x
AI	none	2014 M1	No changes	x	n/a						
AI	BPT1	2014 M2	Work on the problems with the model so as to make progress toward an age-structured assessment		n/a	x					
AI	new	2014 M2	Include pre-1991 data				x				
AI	new	2014 M2	Extend catch data back to 1977								x
AI	new	2014 M2	Include more initial age devs								x
GOA	none	2014 MS1a	No changes	x	n/a						
GOA	none	2011 M3	No changes		n/a	x					
GOA	new	2014 MS1a	Explore initial conditions								x

List of proposed non-model analyses				September analysis							
Region	Proposal	SPM	Brief description of proposal	0	1	2	3	4	5	6	D
EBS	SSC1	n/a	Simulation study on estimability of selectivity type 17 parameters and annual deviations								x
EBS	MM1	2014 M1	R_o profile using the observed data and using simulated data without error		x						
EBS	MM10	2014 M1	Plot the time series of catch/survey to determine whether current values are within historic range*			x					
EBS	new	2014 M2	Initialize the composition weighting process by setting sample sizes equal to number of sampled hauls				x				
AI	BPT2	n/a	Spatial comparison of NMFS trawl survey, IPHC survey, AFSC longline survey, and fishery data		x						
GOA	GPT1	n/a	Examine longline survey RPN and length frequency data for use in the model		x						



May 21, 2015

Chairman Tom Kluberton
Alaska Board of Fisheries
Emailed to dfg.bog.comments@alaska.gov

Re: Possible Decision to Consider Changing the Date for Review and Deliberation of Pacific Cod Proposals

Chairman Kluberton,

The Aleutians East Borough supports moving consideration of Pacific cod proposals from the Alaska Peninsula meeting in February and March 2016, to the December 2015 time period, so that ADFG groundfish staff and our local Pacific cod fishermen will be able to participate fully.

This is the same issue we wanted to address in advance of the previous Alaska Peninsula meeting in February-March of 2013, when we submitted ACR 15 for the 2012 Board Work Session. We were pleased that the Board at that time established the October 2013 Statewide Pacific Cod meeting, allowing South Alaska Peninsula Pacific cod fishermen to participate in the meeting.

As you know, many vessels in our local small boat fleet participate in several local state fisheries throughout the year, including salmon fishing in the summer and Tanner crab and Pacific cod in the winter & spring. That means that many of our fishermen will still need to choose: whether to participate in the State Pacific cod fishery or to attend the Alaska Peninsula Board of Fish meeting for salmon issues. We hope in the future that you will consider a fall/winter time period in the Board meeting cycle for all Alaska Peninsula finfish issues, as a solution that will allow full stakeholder participation by fishermen in the Aleutians East Borough.

Thank you for the opportunity to comment in advance of your consideration of this issue.

Sincerely,

Ernest Weiss

Aleutians East Borough
Natural Resources Director

To Alaska Board of Fisheries

re: Proposal to change Alaska Peninsula Area 0 State Water Cod meeting from Feb 23 - Mar 3 to Nov 30 - Dec 7th

I support changing the meeting from February to December. We participate in the Area 0 state water cod fishery. These fisheries are very good for state residents of the state of Alaska. I would like to participate in the meetings, but cant if I am fishing in February. Please consider this change.

Thank you.
DAN VEERHUSEN

Don Veerhusen



From: [Chuck McCallum](#)
To: [Haight, Glenn E \(DFG\)](#)
Subject: Re: Thoughts on shifting P. Cod proposals to December
Date: Thursday, May 07, 2015 11:34:49 AM

I think it is an extremely good idea to avoid doing cod proposals in February and March and do them in December -- for all future years.

Chuck McCallum

On Thu, May 7, 2015 at 10:49 AM, Haight, Glenn E (DFG)
<glenn.haight@alaska.gov> wrote:

Hi Chuck,

I wanted to check again and see if you had thoughts on moving P. Cod proposals to December?

Thank you,

Glenn

From: Haight, Glenn E (DFG)
Sent: Tuesday, May 05, 2015 9:35 AM
To: 'Chuck McCallum'
Subject: Thoughts on shifting P. Cod proposals to December

Good morning Chuck,

As currently scheduled and cast, the Board of Fisheries is prepared to review and deliberate on Pacific cod proposals at its Alaska Peninsula, BS/AI, and Chignik meeting, February 23 – March 3 in Anchorage. We received input recently that the fishery will be underway at that time and key stakeholders would not be able to attend. The Board may consider moving those proposals to the Nov/Dec time slot, but wanted to hear from stakeholders prior.

Do you have any input on this question?

Thank you,



Glenn

Glenn Haight, Executive Director

ADF&G, Boards Support Section

PO Box 115526

Juneau, Alaska 99811

Phone: [907-465-6095](tel:907-465-6095)

Cell: [907-321-8982](tel:907-321-8982)

Glenn.haight@alaska.gov



From: [Ernie Weiss](#)
To: [Haight, Glenn E \(DFG\)](#)
Subject: RE: Thoughts on shifting P. Cod proposals to December
Date: Tuesday, May 05, 2015 10:20:03 AM

Glenn – thanks for the question. As you know our local fleet participates in several state fisheries, including summer salmon and winter tanner crab and P. cod. The Feb/March time slot for our area's Board of Fish meeting has never been convenient – most of our salmon fishermen are busy in Feb/March fishing for cod.

The key question for us, if you are discussing moving the P.cod to Nov/Dec, would that be 2015 (during the same cycle)? We could support that, but we would not support a delay to the following cycle, based on my short poll.

Would appreciate hearing whether the Board would hear P.cod proposals earlier or later – 2015 or 2016? Thanks.

Ernie Weiss
907-274-7557

From: Haight, Glenn E (DFG) [mailto:glenn.haight@alaska.gov]
Sent: Tuesday, May 05, 2015 9:35 AM
To: Ernie Weiss
Subject: Thoughts on shifting P. Cod proposals to December

Good morning Ernie,

As currently scheduled and cast, the Board of Fisheries is prepared to review and deliberate on Pacific cod proposals at its Alaska Peninsula, BS/AI, and Chignik meeting, February 23 – March 3 in Anchorage. We received input recently that the fishery will be underway at that time and key stakeholders would not be able to attend. The Board may consider moving those proposals to the Nov/Dec time slot, but wanted to hear from stakeholders prior.

Do you have any input on this question?

Thank you,
Glenn

Glenn Haight, Executive Director
ADF&G, Boards Support Section
PO Box 115526
Juneau, Alaska 99811
Phone: 907-465-6095
Cell: 907-321-8982
Glenn.haight@alaska.gov



From: [Frank Kelty](#)
To: [Haight, Glenn E \(DFG\)](#)
Subject: RE: Thoughts on shifting P. Cod proposals to December
Date: Tuesday, May 05, 2015 10:18:50 AM

Glenn,

I think it's a good idea, NPFMC meeting starts on 12-7-15 many folks are coming in for that meeting if the BOF was held just before that meeting like 12-2-5-15 folks could attend both meetings without having to fly in twice. That would work the best for me I'd hate to come in November and then turnaround and come back again a week or two later. That's my thoughts hope it helps.

Regards Frank Kelty

From: Haight, Glenn E (DFG) [mailto:glenn.haight@alaska.gov]
Sent: Tuesday, May 05, 2015 9:36 AM
To: Frank Kelty
Subject: Thoughts on shifting P. Cod proposals to December

Good morning Frank,

As currently scheduled and cast, the Board of Fisheries is prepared to review and deliberate on Pacific cod proposals at its Alaska Peninsula, BS/AI, and Chignik meeting, February 23 – March 3 in Anchorage. We received input recently that the fishery will be underway at that time and key stakeholders would not be able to attend. The Board may consider moving those proposals to the Nov/Dec time slot, but wanted to hear from stakeholders prior.

Do you have any input on this question?

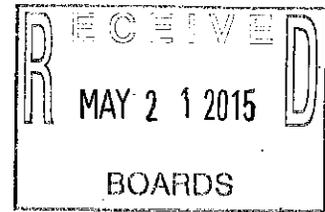
Thank you,
Glenn

Glenn Haight, Executive Director
ADF&G, Boards Support Section
PO Box 115526
Juneau, Alaska 99811
Phone: 907-465-6095
Cell: 907-321-8982
Glenn.haight@alaska.gov



P.O. Box 37
King Cove, AK 99612
hmackmayor@gmail.com

Office of the Mayor



Tom Kluberton
Vice Chair, Alaska Board of Fisheries
PO Box 115526
Juneau, Alaska 99811

May 19, 2015

Dear Chairman Kluberton:

I support changing the meeting date for Pacific Cod proposals to the November 30, 2015 meeting. The state water pacific cod fishery is very important to state residents, and we appreciate being able to participate in these meetings.

A meeting in November and December allows fishermen who fish state water pacific cod to participate in the Board of Fish process.

If the meeting is held in February most fishermen are fishing or preparing to fish.

Thank you for considering this request.

Sincerely,

Henry Mack
Mayor