

ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON COMMERCIAL REGULATORY PROPOSALS COMMITTEE OF THE WHOLE FOR THE

ALASKA PENINSULA, ALEUTIAN ISLANDS, BERING SEA, AND CHIGNIK PACIFIC COD ALASKA BOARD OF FISHERIES MEETING ANCHORAGE, ALASKA

October 30–31, 2025



Regional Information Report No. 5J25-04

The following staff comments were prepared by the Alaska Department of Fish and Game (department) for use at the Alaska Board of Fisheries (board) meeting, October 30–31, 2025, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

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Weights and measures (metric)		General		Acronyms	
centimeter	cm	Alaska Administrative Code	AAC	Acceptable Biological Catch	ABC
deciliter	dL			Alaska Board of Fisheries	board
gram	g	all commonly accepted abbreviations	e.g., Mr., Mrs., AM, PM, etc.	Alaska Department of Fish and Game	department /ADF&G
hectare	ha			Amount Necessary for Subsistence	ANS
kilogram	kg	all commonly accepted professional titles	e.g., Dr., Ph.D., R.N., etc.	Alaska Wildlife Troopers	AWT
kilometer	km			Biological Escapement Goal	BEG
liter	L	at	@	Central Gulf of Alaska	CGOA
meter	m	compass directions:		Coded Wire Tag	CWT
milliliter	mL	east	E	Commercial Fisheries Entry Commission	CFEC
millimeter	mm	north	N	Cook Inlet Aquaculture Association	CIAA
		south	S	Customary and Traditional Department of Natural Resources	C&T
Weights and measures (English)		west	W	Demersal Shelf Rockfish	DSR
cubic feet per second	ft ³ /s	copyright	©	Emergency Order	EO
foot	ft	corporate suffixes:		Guideline Harvest Level	GHL
gallon	gal	Company	Co.	Gulf of Alaska	GOA
inch	in	Corporation	Corp.	Global Positioning System	GPS
mile	mi	Incorporated	Inc.	Individual Fishing Quota	IFQ
nautical mile	nmi	Limited	Ltd.	Local Area Management Plan	LAMP
ounce	oz	District of Columbia et alii (and others)	D.C. et al.	Lower Cook Inlet	LCI
pound	lb	et cetera (and so forth)	etc.	Mean Low Water	MLW
quart	qt	exempli gratia (for example)	e.g.	Mean Lower Low Water	MLLW
yard	yd	Federal Information Code	FIC	No Data	ND
		id est (that is)	i.e.	National Marine Fisheries Service	NMFS
Time and temperature		latitude or longitude	lat or long	National Oceanic and Atmospheric Administration	NOAA
day	d	monetary symbols (U.S.)	\$, ¢	Nick Dudiak Fishing Lagoon	NDFL
degrees Celsius	°C	months (tables and figures): first three letters	Jan,...,Dec	North Pacific Fishery Management Council	NPFMC
degrees Fahrenheit	°F	registered trademark	®	Optimum Escapement Goal	OEG
degrees kelvin	K	trademark	™	Pelagic Shelf Rockfish	PSR
hour	h	United States (adjective)	U.S.	Prince William Sound	PWS
minute	min	United States of America (noun)	USA	Prior Notice of Landing	PNOL
second	s	U.S.C.	United States Code	Private Nonprofit Salmon Hatchery	PNP
		U.S. state	use two-letter abbreviations (e.g., AK, WA)	River Mile	RM
Physics and chemistry				Special Harvest Area	SHA
all atomic symbols				Sustainable Escapement Goal	SEG
alternating current	AC			Trail Lakes Hatchery	TLH
ampere	A			Upper Cook Inlet	UCI
calorie	cal			Western Gulf of Alaska	WGOA
direct current	DC				
hertz	Hz				
horsepower	hp				
hydrogen ion activity (negative log of)	pH				
parts per million	ppm				
parts per thousand	ppt, ‰				
volts	V				
watts	W				

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FOR THE**

**ALASKA PENINSULA, ALEUTIAN ISLANDS, BERING SEA,
AND CHIGNIK PACIFIC COD**

**ALASKA BOARD OF FISHERIES MEETING
ANCHORAGE, ALASKA**

October 30–31, 2025

by
Alaska Department of Fish and Game

Alaska Department of Fish and Game
Division of Sport Fish, Research and Technical Services
333 Raspberry Road, Anchorage, AK 99518-1565

October 2025

ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on commercial regulatory proposals for Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific cod. These comments were prepared by the department for use at the Alaska Board of Fisheries meeting, October 30–31, 2025, in Anchorage, Alaska. The comments are forwarded to assist the public and the board. The comments contained herein should be considered preliminary and subject to change, as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

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Summary of department positions on regulatory proposals for Alaska Peninsula, Aleutian Islands, Bering Sea, and Chignik Pacific cod; Anchorage, Alaska, October 30–31, 2025.

Proposal No.	Department Position	Issue
1	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level.
2	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level.
3	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level and include a proposed step-up provision.
4	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level and include a proposed step-up provision.
5	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level and include a proposed step-up provision.
6	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level and include a proposed step-up provision.
7	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level and include a proposed step-up provision.
8	N	Increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level and include a proposed step-up provision.
9	N	Create a Pacific cod no-fishing zone in state waters.
10	N	Amend the season opening date for the Dutch Harbor Subdistrict state-waters Pacific cod pot gear fishery.
11	N	Amend closed waters for groundfish fishing with pelagic and nonpelagic trawl gear in the Aleutian Islands District.

N = Neutral; S = Support; O = Oppose; NA = No Action; WS = Withdrawn Support

COMMITTEE OF THE WHOLE: ALASKA PENINSULA, ALEUTIAN ISLANDS, BERING SEA, AND CHIGNIK PACIFIC COD (11 PROPOSALS)

SOUTH ALASKA PENINSULA PACIFIC COD MANAGEMENT PLAN (8 PROPOSALS)

PROPOSAL 1 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: Steven Gould.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 50% of the federal Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC).

This proposal is one of eight similar proposals seeking to increase the South Alaska Peninsula Area state-waters Pacific cod GHL (Proposals 1–8; Table 1).

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 2). Conversely, reallocating 20% of the federal WGOA ABC to the state-waters fisheries would result in a corresponding decrease in the federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance, some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in federal fishery closures.

BACKGROUND: Three Pacific cod fisheries (federal, parallel, and state waters) occur in the South Alaska Peninsula Management Area.

- The federal fishery is managed exclusively by the National Marine Fisheries Service and prosecuted in federal waters (3–200 nmi offshore). Harvest in this fishery is deducted from the federal TAC.
- Concurrent to the federal fishery, the state opens a parallel fishery inside waters under state jurisdiction (0–3 nmi). The state adopts most federal rules and management actions inside state waters during the parallel fishery. Harvest in this fishery is deducted from the federal TAC.
- A separate state-waters Pacific cod fishery is also prosecuted from 0–3 nmi but is managed exclusively by the state according to board regulations. Harvest in this fishery is deducted from the state-waters GHL.

In 1996, the board adopted state-waters Pacific cod management plans for fisheries in five management areas, including South Alaska Peninsula Area (5 AAC 28.081). The initial harvest

level for the South Alaska Peninsula Area was set at 15% of the WGOA ABC. The percentage of WGOA ABC allocated to South Alaska Peninsula Area was structured to increase by 5% if the GHL was reached in any calendar year, to a maximum of 25%. The South Alaska Peninsula Area fishery achieved the final GHL step-up increment to 25% in 2000. Prior to the 2014 season, the board increased the GHL to 30% of the WGOA ABC. There are no provisions in regulation that reduce the GHL if annual state-waters GHLS are not achieved during a calendar year.

The South Alaska Peninsula Area state-waters Pacific cod fishery is an open access fishery with exclusive registration requirements. All vessels participating in the state-waters fishery are restricted to a maximum of 58 feet in overall length. Legal gear is restricted to either pot or jig gear and the GHL is allocated between the two gear types (85% pot; 15% jig). The state-waters season for pot gear vessels opens seven days following closure of the WGOA federal/parallel pot gear season or March 7, whichever is later. The state-waters season for jig vessels opens 48 hours after closure of the WGOA federal/parallel season for jig gear, or March 15, whichever is earlier.

Since the inception of the fishery in 1997, the pot gear allocation has been fully harvested during all but one season (2003; Table 3); the jig gear GHL has been fully harvested during 9 out of 29 seasons (31% of seasons; Table 4). From 2016 through 2025, pot gear vessels harvested an average of 99% of their annual GHL allocation and jig gear vessels harvested an average of 32% of their annual GHL allocation (Tables 3 and 4). Pot gear harvest rates are higher compared to jig gear, resulting in relatively fast-paced seasons. From 2016 to 2025, the pot gear season averaged 12 days in length annually. Increasing the state-waters GHL to 50–60% of the WGOA ABC would likely increase the length of the state-waters pot gear season by 8–12 days on average, based on historical catch rates.

State-waters jig gear seasons frequently remain open most of the year, with the majority of harvest occurring during spring and summer months. If any jig gear GHL allocation remains unharvested after the closure of the fall federal/parallel WGOA pot gear B season, the department may reopen the state-waters season to both pot and jig gear vessels to facilitate full harvest of the GHL prior to the regulatory season closure on December 31. Reopening of the state-waters season is commonly referred to as a rollover season. In some years, even though a portion of the jig gear GHL allocation remained available for harvest, rollover seasons were precluded because the federal WGOA pot gear B season did not close.

The North Pacific Fishery Management Council (NPFMC) annually adopts a Pacific cod ABC for the federal WGOA management area. State and federal Pacific cod removals (GHL + TAC) are coordinated to not exceed the annual Pacific cod ABC. The federal/parallel WGOA Pacific cod TAC is subdivided across six harvesting sectors, each receiving a separate TAC allocation (Table 5). Federal/parallel TAC allocations are further divided into A and B seasons. For most sectors, the A season opens on January 1 and the B season opens on September 1. Any increase in the state-waters GHL proportionally reduces federal TAC available to federal sectors (Table 6). Average effort, TAC, harvest, and TAC utilization by federal WGOA Pacific cod sector is summarized in Table 7. On average, federal WGOA Pacific cod sectors harvested approximately 87% of their total combined TACs from 2015 to 2024.

From 2016 to 2025, an average of 56 vessels participated in WGOA federal/parallel Pacific cod fishery annually, with most harvest taken by trawl gear (41%) and pot gear (36%) vessels. From 2016 to 2025, an average of 39 vessels annually participated in South Alaska Peninsula state-waters Pacific cod fishery with most harvest taken by pot gear vessels (95%). For the past ten

seasons, 54% of vessels that participated in South Alaska Peninsula state-waters Pacific cod fishery also participated in the WGOA federal/parallel fisheries. Vessels ineligible to participate in both the federal/parallel and state-waters fisheries (i.e., longline catcher processors) would realize the largest reduction in opportunity from this proposal if adopted (Table 7).

In 2001, the NPFMC established no fishing zones around Steller sea lion haulouts and rookeries in federal waters in response to declining sea lion populations and their listing as an endangered species under the Endangered Species Act (ESA). The State of Alaska subsequently adopted most federal Steller sea lion closure areas for parallel Pacific cod fisheries under *Management measures in parallel groundfish fisheries for protection of Steller sea lions* (5 AAC 28.087). However, state-waters Pacific cod management plans only adopt a small subset of the federal/parallel Steller sea lion closure areas. Allocating additional Pacific cod ABC to the state-waters fishery could allow for higher Pacific cod harvest in areas that would be otherwise closed by federal regulation which could trigger a Steller sea lion re-consultation process under ESA.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 1.–Index of proposals seeking to increase the South Alaska Peninsula Area state-waters Pacific cod GHL.

Proposal	Base GHL %	Max GHL %	GHL Step Up	GHL Step Up Basis
1	50%	50%	No	-
2	50%	50%	No	-
3	40%	50%	5% per year	Total harvest
4	40%	50%	5% per year	Total harvest
5	40%	50%	5% per year	Pot gear harvest only
6	40%	50%	5% per year	Pot gear harvest only
7	50%	60%	5% per year	Total harvest
8	50%	60%	5% per year	Total harvest

Note: GHL = guideline harvest level; GHL represented as % of WGOA Pacific cod ABC.

Table 2.–Current Western Gulf of Alaska Pacific cod ABC apportionment and all proposed (Proposals 1-8) state-waters GHL allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHL	Proposed 40% state- waters GHL	Proposed 50% state- waters GHL	Proposed 60% state- waters GHL
2016	89,292,914	62,505,040	26,787,874	35,717,166	44,646,457	53,575,748
2017	80,007,139	56,004,997	24,002,142	32,002,855	40,003,569	48,004,283
2018	17,817,577	12,472,304	5,345,273	7,127,031	8,908,789	10,690,546
2019	16,827,712	11,779,398	5,048,314	6,731,085	8,413,856	10,096,627
2020	10,895,133	7,626,593	3,268,540	4,358,053	5,447,567	6,537,080
2021	17,605,936	12,324,155	5,281,781	7,042,374	8,802,968	10,563,561
2022	21,918,133	15,342,693	6,575,440	8,767,253	10,959,067	13,150,880
2023	16,455,134	11,518,594	4,936,540	6,582,054	8,227,567	9,873,081
2024	19,279,227	13,495,459	5,783,768	7,711,691	9,639,614	11,567,536
2025	19,202,066	13,441,446	5,760,620	7,680,826	9,601,033	11,521,240

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHL = guideline harvest level. Proposed state-waters GHL for Proposal 1 in bold.

Table 3.—South Alaska Peninsula Area state-waters Pacific cod pot gear effort, GHL, and harvest, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	51	469	9,424,762 ^a	9,097,805	96.5%	\$0.19	\$1,728,583
1998	49	309	7,662,497	8,192,803	106.9%	\$0.17	\$1,392,777
1999	52	388	11,071,174	11,115,028	100.4%	\$0.29	\$3,223,358
2000	65	505	12,883,263	14,286,151	110.9%	\$0.32	\$4,571,568
2001	55	311	11,430,968	10,421,593	91.2%	\$0.26	\$2,709,614
2002	49	276	10,524,455	10,669,572	101.4%	\$0.22	\$2,347,306
2003	41	191	9,650,736	7,927,656	82.1%	\$0.27	\$2,140,467
2004	43	277	10,592,385	10,770,980	101.7%	\$0.24	\$2,585,035
2005	39	267	9,798,776	10,206,340	104.2%	\$0.26	\$2,653,648
2006	43	350	12,581,092	11,640,184	92.5%	\$0.38	\$4,423,270
2007	46	406	12,581,092	12,423,973	98.8%	\$0.47	\$5,839,267
2008	48	390	12,148,683	11,901,039	98.0%	\$0.57	\$6,783,592
2009	47	329	10,103,758	10,500,742	103.9%	\$0.25	\$2,625,186
2010	38	240	12,969,933	12,973,186	100.0%	\$0.26	\$3,373,028
2011	49	280	14,232,492	14,363,262	100.9%	\$0.31	\$4,452,611
2012	53	299	13,132,496	13,366,884	101.8%	\$0.34	\$4,544,741
2013	37	248	13,248,680	13,384,834	101.0%	\$0.27	\$3,613,905
2014	38	321	18,408,522	18,805,994	102.2%	\$0.28	\$5,265,678
2015	42	436	21,757,443	21,651,744	99.5%	\$0.28	\$6,062,488
2016	38	498	22,769,927	22,390,711	98.3%	\$0.27	\$6,045,492
2017	42	546	20,401,820	20,141,256	98.7%	\$0.31	\$6,243,789
2018	25	99	4,543,482	4,958,500	109.1%	\$0.42	\$2,082,570
2019	24	93	4,291,067	4,716,527	109.9%	\$0.47	\$2,216,768
2020	19	54	1,805,887	1,676,128	92.8%	\$0.43	\$720,735
2021	28	89	4,489,514	4,053,162	90.3%	\$0.41	\$1,661,796
2022	31	135	5,589,124	5,296,833	94.8%	\$0.47	\$2,489,512
2023	21	78	4,196,059	3,980,000	94.9%	\$0.46	\$1,830,800
2024	9	74	4,916,203	4,967,120	101.0%	\$0.28	\$1,390,794
2025 ^b	20	107	4,896,527	5,028,054	102.7%	\$0.33	\$1,659,258
1997–2025 avg.	39	278	10,809,931	10,720,968	99.2%	\$0.33	\$3,338,327
2016–2025 avg.	26	177	7,789,961	7,720,829	99.1%	\$0.39	\$2,634,151

Note: GHL = guideline harvest level.

^a Total GHL; no GHL allocation by gear type during the 1997 season.

^b Harvest through September 1, 2025.

Table 4.–South Alaska Peninsula Area state-waters Pacific cod jig gear effort, GHL, and harvest, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	43	178	9,424,762 ^a	349,468	3.7%	\$0.17	\$59,410
1998	29	126	1,352,205	438,320	32.4%	\$0.16	\$70,131
1999	25	166	1,953,737	706,951	36.2%	\$0.29	\$205,016
2000	28	145	2,273,517	757,953	33.3%	\$0.48	\$363,817
2001	69	417	2,017,230	3,402,427	168.7%	\$0.28	\$952,680
2002	63	318	1,857,257	2,045,894	110.2%	\$0.24	\$491,015
2003	65	413	1,703,071	3,633,007	213.3%	\$0.27	\$980,912
2004	51	317	1,869,244	1,671,461	89.4%	\$0.24	\$401,151
2005	40	262	1,729,196	1,230,517	71.2%	\$0.26	\$319,934
2006	12	36	2,220,193	99,552	4.5%	\$0.38	\$37,830
2007	14	59	2,220,193	254,178	11.4%	\$0.47	\$119,464
2008	52	310	2,143,885	1,401,011	65.3%	\$0.57	\$798,576
2009	26	185	1,783,016	1,093,382	61.3%	\$0.25	\$273,346
2010	34	294	2,288,812	2,315,081	101.1%	\$0.26	\$601,921
2011	42	271	2,511,616	2,443,043	97.3%	\$0.31	\$757,343
2012	48	345	2,317,499	1,989,884	85.9%	\$0.34	\$676,561
2013	38	281	2,338,002	2,198,511	94.0%	\$0.30	\$659,553
2014	39	295	3,248,563	3,143,144	96.8%	\$0.28	\$880,080
2015	35	323	3,839,549	2,215,841	57.7%	\$0.27	\$598,277
2016	17	121	4,018,222	430,479	10.7%	\$0.27	\$116,229
2017	7	24	3,600,321	54,935	1.5%	\$0.31	\$17,030
2018	17	84	801,791	390,736	48.7%	\$0.41	\$160,202
2019	21	82	757,247	358,447	47.3%	\$0.48	\$172,055
2020	15	94	318,686	375,110	117.7%	\$0.40	\$150,044
2021	18	124	792,267	637,494	80.5%	\$0.39	\$248,623
2022	10	55	986,316	516,879	52.4%	\$0.48	\$248,102
2023	21	169	740,481	963,863	130.2%	\$0.46	\$443,377
2024	10	61	867,565	398,534	45.9%	\$0.27	\$107,604
2025 ^b	7	22	864,093	208,807	24.2%	\$0.35	\$73,082
1997–2025 avg.	31	192	1,907,635	1,231,893	64.6%	\$0.33	\$376,462
2016–2025 avg.	14	84	1,374,699	433,528	31.5%	\$0.38	\$173,635

Note: GHL = guideline harvest level.

^a Total GHL; no GHL allocation by gear type during the 1997 season.

^b Harvest through September 1, 2025.

Table 5.—Current Western Gulf of Alaska federal Pacific cod sectors and total allowable catch (TAC) allocations, 2025.

WGOA federal Pacific cod sector	2025 TAC allocations (%)	2025 TAC allocations (pounds)
Jig	3.5% ^a	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	100.0%	13,441,446

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch.

^a Jig gear allocation taken off the top of the TAC.

Table 6.—Current and proposed Western Gulf of Alaska federal Pacific cod sector total allowable catch (TAC) allocations, in pounds of Pacific cod, 2025.

WGOA federal Pacific cod sector	Current 2025 70% federal TAC (30% state GHL)	Proposed 60% federal TAC (40% state GHL)	Proposed 50% federal TAC (50% state GHL)	Proposed 40% federal TAC (60% state GHL)
Jig	470,451	403,243	336,036	268,829
Longline catcher processor	2,568,257	2,201,363	1,834,469	1,467,575
Longline catcher vessel	181,594	155,652	129,710	103,768
Trawl catcher vessel	4,980,862	4,269,310	3,557,759	2,846,207
Trawl catcher processor	311,304	266,832	222,360	177,888
Pot	4,928,978	4,224,838	3,520,699	2,816,559
Total	13,441,446	11,521,240	9,601,033	7,680,826

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHL = guideline harvest level.

Table 7.—Average Western Gulf of Alaska federal Pacific cod effort, total allowable catch (TAC), and harvest, by sector, 2015–2024.

WGOA federal Pacific cod sector	Vessels	Landings	TAC (pounds)	Harvest (pounds)	% of TAC harvested
Jig	6	152	440,920	119,048	27%
Pot	14	438	5,577,638	4,102,761	74%
Trawl (CP and CV) ^a	15	635	6,029,581	5,601,889	93%
Longline (CP and CV) ^a	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%

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch.

^a Catcher Processors (CP) and Catcher Vessels (CV) sectors combined due to confidentiality.

PROPOSAL 2 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: Dwain Foster Sr.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 50% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC).

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 8). Conversely, reallocating 20% of the WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance, some federal sector TAC allocations could become too small to support directed or incidental fisheries, resulting in fishery closures.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 8.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 50% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	44,646,457
2017	80,007,139	56,004,997	24,002,142	40,003,569
2018	17,817,577	12,472,304	5,345,273	8,908,789
2019	16,827,712	11,779,398	5,048,314	8,413,856
2020	10,895,133	7,626,593	3,268,540	5,447,567
2021	17,605,936	12,324,155	5,281,781	8,802,968
2022	21,918,133	15,342,693	6,575,440	10,959,067
2023	16,455,134	11,518,594	4,936,540	8,227,567
2024	19,279,227	13,495,459	5,783,768	9,639,614
2025	19,202,066	13,441,446	5,760,620	9,601,033

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

PROPOSAL 3 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: Patrick Brown on behalf of Sand Point Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 40% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC). A step-up provision is also proposed such that, if the total GHL is achieved during a season, the GHL would increase by 5% the following year, not to exceed a maximum of 50% of the WGOA Pacific cod ABC. As proposed, the GHL would not step down if the total GHL was not achieved during a season.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 9). Conversely, reallocating WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in fishery closures.

The step-up provision for increasing the GHL in this proposal is triggered by harvest of the total GHL (both pot and jig gear allocations combined). By regulation, a GHL is considered to have been achieved if 90% or more of the GHL is harvested during a season (5 AAC 28.081(d)). Since inception of the fishery in 1997, the pot gear GHL was fully harvested every year except for one but the total GHL was fully harvested during only 23 out of 29 seasons (79% of seasons; Table 10) mainly due to low jig gear harvest.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 9.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 40% state- waters GHl	Proposed Max 50% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	35,717,166	44,646,457
2017	80,007,139	56,004,997	24,002,142	32,002,855	40,003,569
2018	17,817,577	12,472,304	5,345,273	7,127,031	8,908,789
2019	16,827,712	11,779,398	5,048,314	6,731,085	8,413,856
2020	10,895,133	7,626,593	3,268,540	4,358,053	5,447,567
2021	17,605,936	12,324,155	5,281,781	7,042,374	8,802,968
2022	21,918,133	15,342,693	6,575,440	8,767,253	10,959,067
2023	16,455,134	11,518,594	4,936,540	6,582,054	8,227,567
2024	19,279,227	13,495,459	5,783,768	7,711,691	9,639,614
2025	19,202,066	13,441,446	5,760,620	7,680,826	9,601,033

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

Table 10.—South Alaska Peninsula Area state-waters Pacific cod effort, guideline harvest level (GHL), and harvest, all gear (pot and jig) combined, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	88	647	9,424,762	9,447,273	100.2%	\$0.19	\$1,794,982
1998	73	435	9,014,702	8,631,124	95.7%	\$0.17	\$1,467,291
1999	74	554	13,024,911	11,821,979	90.8%	\$0.29	\$3,428,374
2000	90	650	15,156,781	15,044,104	99.3%	\$0.38	\$5,716,759
2001	121	727	13,448,198	13,464,020	100.1%	\$0.26	\$3,500,645
2002	103	594	12,381,712	12,715,465	102.7%	\$0.23	\$2,924,557
2003	92	604	11,353,806	11,560,663	101.8%	\$0.27	\$3,121,379
2004	88	594	12,461,629	12,442,442	99.8%	\$0.24	\$2,986,186
2005	74	529	11,527,972	11,436,857	99.2%	\$0.26	\$2,973,583
2006	54	386	14,801,285	11,739,736	79.3%	\$0.38	\$4,461,100
2007	60	465	14,801,285	12,678,151	85.7%	\$0.47	\$5,958,731
2008	97	700	14,292,568	13,302,050	93.1%	\$0.57	\$7,582,169
2009	72	514	11,886,774	11,594,124	97.5%	\$0.25	\$2,898,531
2010	69	534	15,258,744	15,288,266	100.2%	\$0.26	\$3,974,949
2011	82	551	16,744,109	16,806,305	100.4%	\$0.31	\$5,209,955
2012	95	644	15,449,995	15,356,768	99.4%	\$0.34	\$5,221,301
2013	74	529	15,586,682	15,583,345	100.0%	\$0.27	\$4,207,503
2014	73	616	21,657,085	21,949,138	101.3%	\$0.28	\$6,145,759
2015	76	759	25,596,991	23,867,585	93.2%	\$0.28	\$6,682,924
2016	55	619	26,788,149	22,821,190	85.2%	\$0.27	\$6,161,721
2017	49	570	24,002,142	20,196,191	84.1%	\$0.31	\$6,260,819
2018	41	182	5,345,273	5,349,236	100.1%	\$0.42	\$2,246,679
2019	43	175	5,048,314	5,074,974	100.5%	\$0.47	\$2,385,238
2020	32	148	2,124,573	2,051,238	96.5%	\$0.43	\$882,032
2021	44	213	5,281,781	4,690,656	88.8%	\$0.41	\$1,923,169
2022	41	190	6,575,440	5,813,712	88.4%	\$0.47	\$2,732,445
2023	42	247	4,936,540	4,943,863	100.1%	\$0.46	\$2,274,177
2024	19	135	5,783,768	5,365,654	92.8%	\$0.28	\$1,502,383
2025 ^a	23	114	5,760,620	5,083,602	88.2%	\$0.34	\$1,728,425
1997–2025 avg.	67	470	12,604,020	11,935,162	94.7%	\$0.33	\$3,741,710
2016–2025 avg.	39	259	9,164,660	8,139,032	88.8%	\$0.39	\$2,809,709

^a Harvest through September 1, 2025.

PROPOSAL 4 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: Danny Cumberlidge.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 40% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC). A step-up provision is also proposed such that, if the total GHL is achieved during a season, the GHL would increase by 5% the following year, not to exceed a maximum of 50% of the WGOA Pacific cod ABC. As proposed, the GHL would not step down if the total GHL was not achieved during a season.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 11). Conversely, reallocating WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in fishery closures.

The step-up provision for increasing the GHL in this proposal is triggered by harvest of the total GHL (both pot and jig gear allocations combined). By regulation, a GHL is considered to have been achieved if 90% or more of the GHL is harvested during a season (5 AAC 28.081(d)). Since inception of the fishery in 1997, the pot gear GHL was fully harvested every year except for one but the total GHL was fully harvested during only 23 out of 29 seasons (79% of seasons; Table 12) mainly due to low jig gear harvest.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 11.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 40% state- waters GHl	Proposed Max 50% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	35,717,166	44,646,457
2017	80,007,139	56,004,997	24,002,142	32,002,855	40,003,569
2018	17,817,577	12,472,304	5,345,273	7,127,031	8,908,789
2019	16,827,712	11,779,398	5,048,314	6,731,085	8,413,856
2020	10,895,133	7,626,593	3,268,540	4,358,053	5,447,567
2021	17,605,936	12,324,155	5,281,781	7,042,374	8,802,968
2022	21,918,133	15,342,693	6,575,440	8,767,253	10,959,067
2023	16,455,134	11,518,594	4,936,540	6,582,054	8,227,567
2024	19,279,227	13,495,459	5,783,768	7,711,691	9,639,614
2025	19,202,066	13,441,446	5,760,620	7,680,826	9,601,033

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

Table 12.—South Alaska Peninsula Area state-waters Pacific cod effort, guideline harvest level (GHL), and harvest, all gear (pot and jig) combined, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	88	647	9,424,762	9,447,273	100.2%	\$0.19	\$1,794,982
1998	73	435	9,014,702	8,631,124	95.7%	\$0.17	\$1,467,291
1999	74	554	13,024,911	11,821,979	90.8%	\$0.29	\$3,428,374
2000	90	650	15,156,781	15,044,104	99.3%	\$0.38	\$5,716,759
2001	121	727	13,448,198	13,464,020	100.1%	\$0.26	\$3,500,645
2002	103	594	12,381,712	12,715,465	102.7%	\$0.23	\$2,924,557
2003	92	604	11,353,806	11,560,663	101.8%	\$0.27	\$3,121,379
2004	88	594	12,461,629	12,442,442	99.8%	\$0.24	\$2,986,186
2005	74	529	11,527,972	11,436,857	99.2%	\$0.26	\$2,973,583
2006	54	386	14,801,285	11,739,736	79.3%	\$0.38	\$4,461,100
2007	60	465	14,801,285	12,678,151	85.7%	\$0.47	\$5,958,731
2008	97	700	14,292,568	13,302,050	93.1%	\$0.57	\$7,582,169
2009	72	514	11,886,774	11,594,124	97.5%	\$0.25	\$2,898,531
2010	69	534	15,258,744	15,288,266	100.2%	\$0.26	\$3,974,949
2011	82	551	16,744,109	16,806,305	100.4%	\$0.31	\$5,209,955
2012	95	644	15,449,995	15,356,768	99.4%	\$0.34	\$5,221,301
2013	74	529	15,586,682	15,583,345	100.0%	\$0.27	\$4,207,503
2014	73	616	21,657,085	21,949,138	101.3%	\$0.28	\$6,145,759
2015	76	759	25,596,991	23,867,585	93.2%	\$0.28	\$6,682,924
2016	55	619	26,788,149	22,821,190	85.2%	\$0.27	\$6,161,721
2017	49	570	24,002,142	20,196,191	84.1%	\$0.31	\$6,260,819
2018	41	182	5,345,273	5,349,236	100.1%	\$0.42	\$2,246,679
2019	43	175	5,048,314	5,074,974	100.5%	\$0.47	\$2,385,238
2020	32	148	2,124,573	2,051,238	96.5%	\$0.43	\$882,032
2021	44	213	5,281,781	4,690,656	88.8%	\$0.41	\$1,923,169
2022	41	190	6,575,440	5,813,712	88.4%	\$0.47	\$2,732,445
2023	42	247	4,936,540	4,943,863	100.1%	\$0.46	\$2,274,177
2024	19	135	5,783,768	5,365,654	92.8%	\$0.28	\$1,502,383
2025 ^a	23	114	5,760,620	5,083,602	88.2%	\$0.34	\$1,728,425
1997–2025 avg.	67	470	12,604,020	11,935,162	94.7%	\$0.33	\$3,741,710
2016–2025 avg.	39	259	9,164,660	8,139,032	88.8%	\$0.39	\$2,809,709

^a Harvest through September 1, 2025.

PROPOSAL 5 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: King Cove Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 40% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC). A step-up provision is also proposed such that, if the pot gear GHL allocation is achieved during a season, the GHL would increase by 5% the following year, not to exceed a maximum of 50% of the WGOA Pacific cod ABC. As proposed, the GHL would not step down if the pot gear GHL allocation was not achieved during a season.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 13). Conversely, reallocating WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in fishery closures.

The step-up provision for increasing the GHL in this proposal is triggered by full harvest of the pot gear GHL allocation during a season. By regulation, a GHL is considered to have been achieved if 90% or more of the GHL is harvested (5 AAC 28.081(d)). Since inception of the fishery, the pot gear allocation has been fully harvested during all but one season (2003; Table 14). As written, the GHL step-up provision in this proposal would increase both the pot and jig gear GHL allocations, regardless of whether the jig gear GHL allocation was fully harvested in the prior year. Increasing the total GHL during years with low jig gear effort could result in additional foregone harvest of WGOA ABC.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 13.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 40% state- waters GHl	Proposed Max 50% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	35,717,166	44,646,457
2017	80,007,139	56,004,997	24,002,142	32,002,855	40,003,569
2018	17,817,577	12,472,304	5,345,273	7,127,031	8,908,789
2019	16,827,712	11,779,398	5,048,314	6,731,085	8,413,856
2020	10,895,133	7,626,593	3,268,540	4,358,053	5,447,567
2021	17,605,936	12,324,155	5,281,781	7,042,374	8,802,968
2022	21,918,133	15,342,693	6,575,440	8,767,253	10,959,067
2023	16,455,134	11,518,594	4,936,540	6,582,054	8,227,567
2024	19,279,227	13,495,459	5,783,768	7,711,691	9,639,614
2025	19,202,066	13,441,446	5,760,620	7,680,826	9,601,033

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

Table 14.—South Alaska Peninsula Area state-waters Pacific cod pot gear effort, GHL, and harvest, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	51	469	9,424,762 ^a	9,097,805	96.5%	\$0.19	\$1,728,583
1998	49	309	7,662,497	8,192,803	106.9%	\$0.17	\$1,392,777
1999	52	388	11,071,174	11,115,028	100.4%	\$0.29	\$3,223,358
2000	65	505	12,883,263	14,286,151	110.9%	\$0.32	\$4,571,568
2001	55	311	11,430,968	10,421,593	91.2%	\$0.26	\$2,709,614
2002	49	276	10,524,455	10,669,572	101.4%	\$0.22	\$2,347,306
2003	41	191	9,650,736	7,927,656	82.1%	\$0.27	\$2,140,467
2004	43	277	10,592,385	10,770,980	101.7%	\$0.24	\$2,585,035
2005	39	267	9,798,776	10,206,340	104.2%	\$0.26	\$2,653,648
2006	43	350	12,581,092	11,640,184	92.5%	\$0.38	\$4,423,270
2007	46	406	12,581,092	12,423,973	98.8%	\$0.47	\$5,839,267
2008	48	390	12,148,683	11,901,039	98.0%	\$0.57	\$6,783,592
2009	47	329	10,103,758	10,500,742	103.9%	\$0.25	\$2,625,186
2010	38	240	12,969,933	12,973,186	100.0%	\$0.26	\$3,373,028
2011	49	280	14,232,492	14,363,262	100.9%	\$0.31	\$4,452,611
2012	53	299	13,132,496	13,366,884	101.8%	\$0.34	\$4,544,741
2013	37	248	13,248,680	13,384,834	101.0%	\$0.27	\$3,613,905
2014	38	321	18,408,522	18,805,994	102.2%	\$0.28	\$5,265,678
2015	42	436	21,757,443	21,651,744	99.5%	\$0.28	\$6,062,488
2016	38	498	22,769,927	22,390,711	98.3%	\$0.27	\$6,045,492
2017	42	546	20,401,820	20,141,256	98.7%	\$0.31	\$6,243,789
2018	25	99	4,543,482	4,958,500	109.1%	\$0.42	\$2,082,570
2019	24	93	4,291,067	4,716,527	109.9%	\$0.47	\$2,216,768
2020	19	54	1,805,887	1,676,128	92.8%	\$0.43	\$720,735
2021	28	89	4,489,514	4,053,162	90.3%	\$0.41	\$1,661,796
2022	31	135	5,589,124	5,296,833	94.8%	\$0.47	\$2,489,512
2023	21	78	4,196,059	3,980,000	94.9%	\$0.46	\$1,830,800
2024	9	74	4,916,203	4,967,120	101.0%	\$0.28	\$1,390,794
2025 ^b	20	107	4,896,527	5,028,054	102.7%	\$0.33	\$1,659,258
1997–2025 avg.	39	278	10,809,931	10,720,968	99.2%	\$0.33	\$3,338,327
2016–2025 avg.	26	177	7,789,961	7,720,829	99.1%	\$0.39	\$2,634,151

Note: GHL = guideline harvest level.

^a Total GHL; no GHL allocation by gear type during the 1997 season.

^b Harvest through September 1, 2025.

PROPOSAL 6 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: False Pass Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 40% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC). A step-up provision is also proposed such that, if the pot gear GHL allocation is achieved during a season, the GHL would increase by 5% the following year, not to exceed a maximum of 50% of the WGOA Pacific cod ABC. As proposed, the GHL would not step down if the pot gear GHL allocation was not achieved during a season.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 15). Conversely, reallocating WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catches (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in fishery closures.

The step-up provision for increasing the GHL in this proposal is triggered by full harvest of the pot gear GHL allocation during a season. By regulation, a GHL is considered to have been achieved if 90% or more of the GHL is harvested (5 AAC 28.081(d)). Since inception of the fishery, the pot gear allocation was fully harvested during all but one season (2003; Table 16). As written, the GHL step-up provision in this proposal would increase both the pot and jig gear GHL allocations, regardless of whether the jig gear GHL allocation was fully harvested in the prior year. Increasing the total GHL during years with low jig gear effort could result in additional foregone harvest of WGOA ABC.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 15.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 40% state- waters GHl	Proposed Max 50% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	35,717,166	44,646,457
2017	80,007,139	56,004,997	24,002,142	32,002,855	40,003,569
2018	17,817,577	12,472,304	5,345,273	7,127,031	8,908,789
2019	16,827,712	11,779,398	5,048,314	6,731,085	8,413,856
2020	10,895,133	7,626,593	3,268,540	4,358,053	5,447,567
2021	17,605,936	12,324,155	5,281,781	7,042,374	8,802,968
2022	21,918,133	15,342,693	6,575,440	8,767,253	10,959,067
2023	16,455,134	11,518,594	4,936,540	6,582,054	8,227,567
2024	19,279,227	13,495,459	5,783,768	7,711,691	9,639,614
2025	19,202,066	13,441,446	5,760,620	7,680,826	9,601,033

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

Table 16.—South Alaska Peninsula Area state-waters Pacific cod pot gear effort, GHL, and harvest, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	51	469	9,424,762 ^a	9,097,805	96.5%	\$0.19	\$1,728,583
1998	49	309	7,662,497	8,192,803	106.9%	\$0.17	\$1,392,777
1999	52	388	11,071,174	11,115,028	100.4%	\$0.29	\$3,223,358
2000	65	505	12,883,263	14,286,151	110.9%	\$0.32	\$4,571,568
2001	55	311	11,430,968	10,421,593	91.2%	\$0.26	\$2,709,614
2002	49	276	10,524,455	10,669,572	101.4%	\$0.22	\$2,347,306
2003	41	191	9,650,736	7,927,656	82.1%	\$0.27	\$2,140,467
2004	43	277	10,592,385	10,770,980	101.7%	\$0.24	\$2,585,035
2005	39	267	9,798,776	10,206,340	104.2%	\$0.26	\$2,653,648
2006	43	350	12,581,092	11,640,184	92.5%	\$0.38	\$4,423,270
2007	46	406	12,581,092	12,423,973	98.8%	\$0.47	\$5,839,267
2008	48	390	12,148,683	11,901,039	98.0%	\$0.57	\$6,783,592
2009	47	329	10,103,758	10,500,742	103.9%	\$0.25	\$2,625,186
2010	38	240	12,969,933	12,973,186	100.0%	\$0.26	\$3,373,028
2011	49	280	14,232,492	14,363,262	100.9%	\$0.31	\$4,452,611
2012	53	299	13,132,496	13,366,884	101.8%	\$0.34	\$4,544,741
2013	37	248	13,248,680	13,384,834	101.0%	\$0.27	\$3,613,905
2014	38	321	18,408,522	18,805,994	102.2%	\$0.28	\$5,265,678
2015	42	436	21,757,443	21,651,744	99.5%	\$0.28	\$6,062,488
2016	38	498	22,769,927	22,390,711	98.3%	\$0.27	\$6,045,492
2017	42	546	20,401,820	20,141,256	98.7%	\$0.31	\$6,243,789
2018	25	99	4,543,482	4,958,500	109.1%	\$0.42	\$2,082,570
2019	24	93	4,291,067	4,716,527	109.9%	\$0.47	\$2,216,768
2020	19	54	1,805,887	1,676,128	92.8%	\$0.43	\$720,735
2021	28	89	4,489,514	4,053,162	90.3%	\$0.41	\$1,661,796
2022	31	135	5,589,124	5,296,833	94.8%	\$0.47	\$2,489,512
2023	21	78	4,196,059	3,980,000	94.9%	\$0.46	\$1,830,800
2024	9	74	4,916,203	4,967,120	101.0%	\$0.28	\$1,390,794
2025 ^b	20	107	4,896,527	5,028,054	102.7%	\$0.33	\$1,659,258
1997–2025 avg.	39	278	10,809,931	10,720,968	99.2%	\$0.33	\$3,338,327
2016–2025 avg.	26	177	7,789,961	7,720,829	99.1%	\$0.39	\$2,634,151

Note: GHL = guideline harvest level.

^a Total GHL; no GHL allocation by gear type during the 1997 season.

^b Harvest through September 1, 2025.

PROPOSAL 7 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: Art Holmberg.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 50% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC). A step-up provision is also proposed such that, if the total GHL is achieved during a season, the GHL would increase by 5% the following year, not to exceed a maximum of 60% of the WGOA Pacific cod ABC. As proposed, the GHL would not step down if the total GHL was not achieved during a season.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 17). Conversely, reallocating WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in fishery closures.

The step-up provision for increasing the GHL in this proposal is triggered by harvest of the total GHL (both pot and jig gear allocations combined). By regulation, a GHL is considered to have been achieved if 90% or more of the GHL is harvested during a season (5 AAC 28.081(d)). Since inception of the fishery, the pot gear GHL was fully harvested every year except for one but the total GHL was fully harvested during only 23 out of 29 seasons (79% of seasons; Table 18) mainly due to low jig gear harvest.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 17.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 50% state- waters GHl	Proposed Max 60% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	44,646,457	53,575,748
2017	80,007,139	56,004,997	24,002,142	40,003,569	48,004,283
2018	17,817,577	12,472,304	5,345,273	8,908,789	10,690,546
2019	16,827,712	11,779,398	5,048,314	8,413,856	10,096,627
2020	10,895,133	7,626,593	3,268,540	5,447,567	6,537,080
2021	17,605,936	12,324,155	5,281,781	8,802,968	10,563,561
2022	21,918,133	15,342,693	6,575,440	10,959,067	13,150,880
2023	16,455,134	11,518,594	4,936,540	8,227,567	9,873,081
2024	19,279,227	13,495,459	5,783,768	9,639,614	11,567,536
2025	19,202,066	13,441,446	5,760,620	9,601,033	11,521,240

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

Table 18.—South Alaska Peninsula Area state-waters Pacific cod effort, guideline harvest level (GHL), and harvest, all gear (pot and jig) combined, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	88	647	9,424,762	9,447,273	100.2%	\$0.19	\$1,794,982
1998	73	435	9,014,702	8,631,124	95.7%	\$0.17	\$1,467,291
1999	74	554	13,024,911	11,821,979	90.8%	\$0.29	\$3,428,374
2000	90	650	15,156,781	15,044,104	99.3%	\$0.38	\$5,716,759
2001	121	727	13,448,198	13,464,020	100.1%	\$0.26	\$3,500,645
2002	103	594	12,381,712	12,715,465	102.7%	\$0.23	\$2,924,557
2003	92	604	11,353,806	11,560,663	101.8%	\$0.27	\$3,121,379
2004	88	594	12,461,629	12,442,442	99.8%	\$0.24	\$2,986,186
2005	74	529	11,527,972	11,436,857	99.2%	\$0.26	\$2,973,583
2006	54	386	14,801,285	11,739,736	79.3%	\$0.38	\$4,461,100
2007	60	465	14,801,285	12,678,151	85.7%	\$0.47	\$5,958,731
2008	97	700	14,292,568	13,302,050	93.1%	\$0.57	\$7,582,169
2009	72	514	11,886,774	11,594,124	97.5%	\$0.25	\$2,898,531
2010	69	534	15,258,744	15,288,266	100.2%	\$0.26	\$3,974,949
2011	82	551	16,744,109	16,806,305	100.4%	\$0.31	\$5,209,955
2012	95	644	15,449,995	15,356,768	99.4%	\$0.34	\$5,221,301
2013	74	529	15,586,682	15,583,345	100.0%	\$0.27	\$4,207,503
2014	73	616	21,657,085	21,949,138	101.3%	\$0.28	\$6,145,759
2015	76	759	25,596,991	23,867,585	93.2%	\$0.28	\$6,682,924
2016	55	619	26,788,149	22,821,190	85.2%	\$0.27	\$6,161,721
2017	49	570	24,002,142	20,196,191	84.1%	\$0.31	\$6,260,819
2018	41	182	5,345,273	5,349,236	100.1%	\$0.42	\$2,246,679
2019	43	175	5,048,314	5,074,974	100.5%	\$0.47	\$2,385,238
2020	32	148	2,124,573	2,051,238	96.5%	\$0.43	\$882,032
2021	44	213	5,281,781	4,690,656	88.8%	\$0.41	\$1,923,169
2022	41	190	6,575,440	5,813,712	88.4%	\$0.47	\$2,732,445
2023	42	247	4,936,540	4,943,863	100.1%	\$0.46	\$2,274,177
2024	19	135	5,783,768	5,365,654	92.8%	\$0.28	\$1,502,383
2025 ^a	23	114	5,760,620	5,083,602	88.2%	\$0.34	\$1,728,425
1997–2025 avg.	67	470	12,604,020	11,935,162	94.7%	\$0.33	\$3,741,710
2016–2025 avg.	39	259	9,164,660	8,139,032	88.8%	\$0.39	\$2,809,709

^a Harvest through September 1, 2025.

PROPOSAL 8 – 5 AAC 28.577. South Alaska Peninsula Pacific Cod Management Plan.

PROPOSED BY: Dale Pedersen.

WHAT WOULD THE PROPOSAL DO? This would increase the South Alaska Peninsula Area state-waters Pacific cod guideline harvest level (GHL) from 30% to 50% of the Western Gulf of Alaska (WGOA) Pacific cod acceptable biological catch (ABC). A step-up provision is also proposed such that, if the total GHL is achieved during a season, the GHL would increase by 5% the following year, not to exceed a maximum of 60% of the WGOA Pacific cod ABC. As proposed, the GHL would not step down if the total GHL was not achieved during a season.

WHAT ARE THE CURRENT REGULATIONS? The South Alaska Peninsula Area state-waters Pacific cod fishery GHL is based on 30% of the estimated annual WGOA Pacific cod ABC (5 AAC 28.577(h)(1)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Increasing the state-waters GHL would provide additional harvest opportunity for pot and jig gear vessels eligible to participate in the South Alaska Peninsula state-waters Pacific cod fishery (Table 19). Conversely, reallocating WGOA ABC to the state-waters fishery would result in a corresponding decrease in federal Pacific cod total allowable catch (TAC), yielding lower harvests, shorter seasons, and increased competition among participants that have historically participated in the WGOA federal/parallel Pacific cod fishery. During periods of low Pacific cod abundance some federal sector TAC allocations could become too small to support directed or incidental fisheries resulting in fishery closures.

The step-up provision for increasing the GHL in this proposal is triggered by harvest of the total GHL (both pot and jig gear allocations combined). By regulation, a GHL is considered to have been achieved if 90% or more of the GHL is harvested during a season (5 AAC 28.081(d)). Since inception of the fishery in 1997, the pot gear GHL was fully harvested every year except for one but the total GHL was fully harvested during only 23 out of 29 seasons (79% of seasons; Table 20) mainly due to low jig gear harvest.

BACKGROUND: See Proposal 1.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 19.—Current Western Gulf of Alaska Pacific cod ABC apportionment and proposed state-waters allocations in pounds of Pacific cod, by year, 2016–2025.

Year	WGOA ABC	Current 70% WGOA Federal TAC	Current 30% state- waters GHl	Proposed 50% state- waters GHl	Proposed Max 60% state- waters GHl
2016	89,292,914	62,505,040	26,787,874	44,646,457	53,575,748
2017	80,007,139	56,004,997	24,002,142	40,003,569	48,004,283
2018	17,817,577	12,472,304	5,345,273	8,908,789	10,690,546
2019	16,827,712	11,779,398	5,048,314	8,413,856	10,096,627
2020	10,895,133	7,626,593	3,268,540	5,447,567	6,537,080
2021	17,605,936	12,324,155	5,281,781	8,802,968	10,563,561
2022	21,918,133	15,342,693	6,575,440	10,959,067	13,150,880
2023	16,455,134	11,518,594	4,936,540	8,227,567	9,873,081
2024	19,279,227	13,495,459	5,783,768	9,639,614	11,567,536
2025	19,202,066	13,441,446	5,760,620	9,601,033	11,521,240

Note: WGOA = Western Gulf of Alaska; TAC = total allowable catch; GHl = guideline harvest level.

Table 20.—South Alaska Peninsula Area state-waters Pacific cod effort, guideline harvest level (GHL), and harvest, all gear (pot and jig) combined, by year, 1997–2025.

Year	Vessels	Landings	GHL (pounds)	Harvest (pounds)	% of GHL harvested	Price per pound	Exvessel value
1997	88	647	9,424,762	9,447,273	100.2%	\$0.19	\$1,794,982
1998	73	435	9,014,702	8,631,124	95.7%	\$0.17	\$1,467,291
1999	74	554	13,024,911	11,821,979	90.8%	\$0.29	\$3,428,374
2000	90	650	15,156,781	15,044,104	99.3%	\$0.38	\$5,716,759
2001	121	727	13,448,198	13,464,020	100.1%	\$0.26	\$3,500,645
2002	103	594	12,381,712	12,715,465	102.7%	\$0.23	\$2,924,557
2003	92	604	11,353,806	11,560,663	101.8%	\$0.27	\$3,121,379
2004	88	594	12,461,629	12,442,442	99.8%	\$0.24	\$2,986,186
2005	74	529	11,527,972	11,436,857	99.2%	\$0.26	\$2,973,583
2006	54	386	14,801,285	11,739,736	79.3%	\$0.38	\$4,461,100
2007	60	465	14,801,285	12,678,151	85.7%	\$0.47	\$5,958,731
2008	97	700	14,292,568	13,302,050	93.1%	\$0.57	\$7,582,169
2009	72	514	11,886,774	11,594,124	97.5%	\$0.25	\$2,898,531
2010	69	534	15,258,744	15,288,266	100.2%	\$0.26	\$3,974,949
2011	82	551	16,744,109	16,806,305	100.4%	\$0.31	\$5,209,955
2012	95	644	15,449,995	15,356,768	99.4%	\$0.34	\$5,221,301
2013	74	529	15,586,682	15,583,345	100.0%	\$0.27	\$4,207,503
2014	73	616	21,657,085	21,949,138	101.3%	\$0.28	\$6,145,759
2015	76	759	25,596,991	23,867,585	93.2%	\$0.28	\$6,682,924
2016	55	619	26,788,149	22,821,190	85.2%	\$0.27	\$6,161,721
2017	49	570	24,002,142	20,196,191	84.1%	\$0.31	\$6,260,819
2018	41	182	5,345,273	5,349,236	100.1%	\$0.42	\$2,246,679
2019	43	175	5,048,314	5,074,974	100.5%	\$0.47	\$2,385,238
2020	32	148	2,124,573	2,051,238	96.5%	\$0.43	\$882,032
2021	44	213	5,281,781	4,690,656	88.8%	\$0.41	\$1,923,169
2022	41	190	6,575,440	5,813,712	88.4%	\$0.47	\$2,732,445
2023	42	247	4,936,540	4,943,863	100.1%	\$0.46	\$2,274,177
2024	19	135	5,783,768	5,365,654	92.8%	\$0.28	\$1,502,383
2025 ^a	23	114	5,760,620	5,083,602	88.2%	\$0.34	\$1,728,425
1997–2025 avg.	67	470	12,604,020	11,935,162	94.7%	\$0.33	\$3,741,710
2016–2025 avg.	39	259	9,164,660	8,139,032	88.8%	\$0.39	\$2,809,709

^a Harvest through September 1, 2025.

DUTCH HARBOR SUBDISTRICT PACIFIC COD FISHERY (2 PROPOSALS)

PROPOSAL 9 – 5 AAC 28.650. Closed waters in Bering Sea-Aleutian Islands Area and 5 AAC 28.5XX. New Section

PROPOSED BY: False Pass Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would create state-waters Pacific cod no fishing zones east and west of the boundary line on Unimak Island that separates the South Alaska Peninsula Area (SAP) and Dutch Harbor Subdistrict (DHS) state-waters Pacific cod fisheries (Figure 1).

WHAT ARE THE CURRENT REGULATIONS? The DHS includes state waters of the Aleutian Islands District east of 170° W long and the state waters of the Bering Sea District that are west of 162°30' W long, east of 170° W long, and south of 55°30' N lat, with closed waters south of 53°06.11' N lat (Figure 2).

The SAP groundfish registration area consists of all waters between a line extending 135° southeast from Kupreanof Point (55°33.98' N lat, 159°35.88' W long) and 170° W long near western Chuginadak Island (Figures 3 and 4). The DHS and SAP state-waters Pacific cod fisheries share a common boundary in Unimak Pass (54° 23.74' N lat, 164° 44.73' W long) with the DHS fishery occurring north of the line and the SAP occurring south of the line (Figure 1).

The DHS state-waters Pacific cod fishery is an open access fishery with exclusive registration requirements. Legal gear is restricted to either pot or jig gear, with separate guideline harvest levels (GHL) for each gear type. Vessels participating in the state-waters fishery are restricted to a maximum of 58 feet in overall length. The state-waters season for pot gear vessels opens seven days following closure of the federal Bering Sea and Aleutian Islands hook-and-line and pot catcher vessels less than 60 feet in length. The state-waters season for jig vessels opens May 1.

The SAP Area state-waters Pacific cod fishery is an open access fishery with exclusive registration requirements. Legal gear is restricted to either pot or jig gear; the GHL is allocated between the two gear types (85% pot; 15% jig). Vessels participating in the state-waters fishery are restricted to a maximum of 58 feet in OAL. The state-waters season for pot gear vessels opens seven days following closure of the Western Gulf of Alaska (WGOA) federal/parallel pot gear season or March 7, whichever is later. The state-waters season for jig vessels opens 48 hours after closure of the WGOA federal/parallel season for jig gear, or March 15, whichever is earlier.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, immediate fishery effects would be most noticeable for DHS pot gear participants. For the past five years, approximately 50% of the total annual GHLs, or about 92.5 million pounds of total catch, was harvested within the two statistical areas (645410 and 645435) fully contained within the proposed DHS no fishing zone. (Table 21 and Figure 1). Approximately 21% of the total annual GHLs, or 38.1 million pounds of total annual catch, was harvested within the statistical area (645433) bisected by the proposed DHS no fishing zone (Table 21). Redistributing the majority of annual DHS pot harvest away from the most productive fishing grounds in Unimak Pass to other fishing grounds within the DHS would result in longer seasons, lower fishery performance, and higher vessel operating costs.

Additionally, failure of the DHS pot fleet to harvest the GHL within a season could result in reductions in the GHL via regulatory step-down provisions specified in the fishery management plan. This reduction would reallocate harvest opportunity to the federal fishery to the benefit of federal users. These effects could be compounded if DHS pot gear season dates change as specified in Proposal 10.

If adopted, fishery effects for SAP pot gear participants would likely be minimal compared to DHS pot gear participants. In the past five years, no pot gear harvest was reported in the proposed SAP no fishing zone. The last reported harvest from the proposed SAP no fishing zone occurred in 2015 by one vessel. Harvest is confidential.

The North Pacific Fishery Management Council (NPFMC) annually adopts separate Pacific cod acceptable biological catch (ABC) levels for the federal Bering Sea Subarea and WGOA management area. State and federal Pacific cod removals (GHL + TAC) are coordinated to not exceed the annual Pacific cod ABC in each federal management area. Satellite tagging research indicates seasonal movement occurs between the Western Gulf of Alaska, Eastern Bering Sea, Northern Bering Sea, and Russian waters (December 2024 Assessment of the Pacific Cod Stock in the Eastern Bering Sea). Tagged fish generally move northward from winter spawning to summer foraging locations and southward from summer foraging to winter spawning locations. While some tagged fish were observed traveling from the Bering Sea to traditional SAP fishing grounds, tagged fish from SAP were also observed traveling north into the Bering Sea. Thus, the biological and fishery impacts of limiting harvest around the western part of Unimak Island are unknown.

There is no reported jig gear effort in either of the proposed no fishing zones, so impacts to jig gear participants are expected to be nominal.

BACKGROUND: The *Dutch Harbor Subdistrict Pacific Cod Management Plan* (5 AAC 28.648) was first adopted in 2013, and the first state-waters season occurred in 2014. The current DHS management plan allocates a proportion of the federal Bering Sea Subarea Pacific cod ABC to the DHS pot gear fishery, allowing the GHL to fluctuate, in part, with Pacific cod abundance in addition to fishery performance. The basis for setting annual GHLs has changed several times since the fishery was established. Currently, the DHS Pacific cod management plan sets the GHL at 10% of the Bering Sea Subarea ABC with a 1% step-up provision allowing for a maximum GHL of 15% of the Bering Sea Subarea ABC. The step-up provision requires the pot GHL to be achieved for two consecutive years before a 1% GHL step-up can occur. Conversely, a 1% step-down will occur if the GHL is not achieved for two consecutive seasons, down to a minimum GHL based on 10% of the Bering Sea Subarea Pacific cod ABC.

The DHS GHL has been achieved every year since the inception of the fishery with annual harvest ranging from 17.6 million to 41.8 million pounds. On average, 31.6 million pounds of Pacific cod were harvested annually during the DHS fishery from 2014–2025 (Table 22). Vessel participation ranged from 14 to 40 vessels, with an average of 27 vessels participating in the most recent five seasons. Weekly harvest typically peaks in late February through mid-March, corresponding to the nearshore migration and schooling of Pacific cod ahead of spawning. Current processing of DHS Pacific cod primarily takes place in the ports of Akutan and Dutch Harbor. Average season duration from 2020–2024 was 171 days and average total fishery exvessel value of \$13.7 million. The 2025 GHL was set at 44,026,000 pounds and as of September 1, 2025, 95% of the GHL has been harvested (Table 22). At 44.0 million pounds, the 2025 DHS fishery is the largest state-waters Pacific cod fishery in the state.

The *South Alaska Peninsula Pacific Cod Management Plan* (5 AAC 28.577) was first adopted in 1996, and the first state-waters season occurred in 1997. The initial GHL was set at 15% of the WGOA ABC. The percentage of WGOA ABC allocated to the SAP Area was structured to increase by 5% if the GHL was reached in any calendar year, to a maximum of 25%. The SAP Area fishery achieved the final GHL step-up increment to 25% in 2000. Prior to the 2014 season, the board increased the GHL to 30% of the WGOA ABC. There are no provisions in regulation that reduce the GHL if annual state-waters GHs are not achieved during a calendar year. Starting in 1998, the GHL was further allocated by gear type (85% pot, 15% jig).

The SAP pot gear GHL allocation has been achieved every year since the inception of the fishery in 1997 except for 2003. Annual harvest ranged from 1.7 million to 22.4 million pounds averaging 10.7 million pounds annually from 1997–2025 (Table 23). Pot gear vessel participation ranged between 9 and 65 vessels, with an average of 22 vessels participating in the fishery for the past five seasons. The jig gear GHL allocation has been achieved during 9 out of 29 seasons with an average of 31 vessels participating from 1997–2025. Processing of SAP Pacific cod primarily occurs in the ports of Sand Point, Akutan, and historically King Cove. Compared to the relatively long DHS pot gear season, the average season duration for SAP pot gear from 2021–2025 was 11 days. Average fishery value from 2021–2025 was \$1.8 million. The 2025 GHL was set at 1,896,527 pounds; the fishery opened on March 7 and closed March 18 with 103% of the GHL harvested (Table 23).

The Gulf of Alaska Pacific cod stock collapsed in response to a marine heat wave occurring from 2014 to 2016. Gulf-wide Pacific cod ABCs and corresponding SAP GHs were subsequently reduced to conserve the remaining stock (Table 23). The Gulf of Alaska Pacific stock appears to be slowly rebuilding. The Bering Sea Pacific cod stock and corresponding DHS GHs have remained relatively stable during this time.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

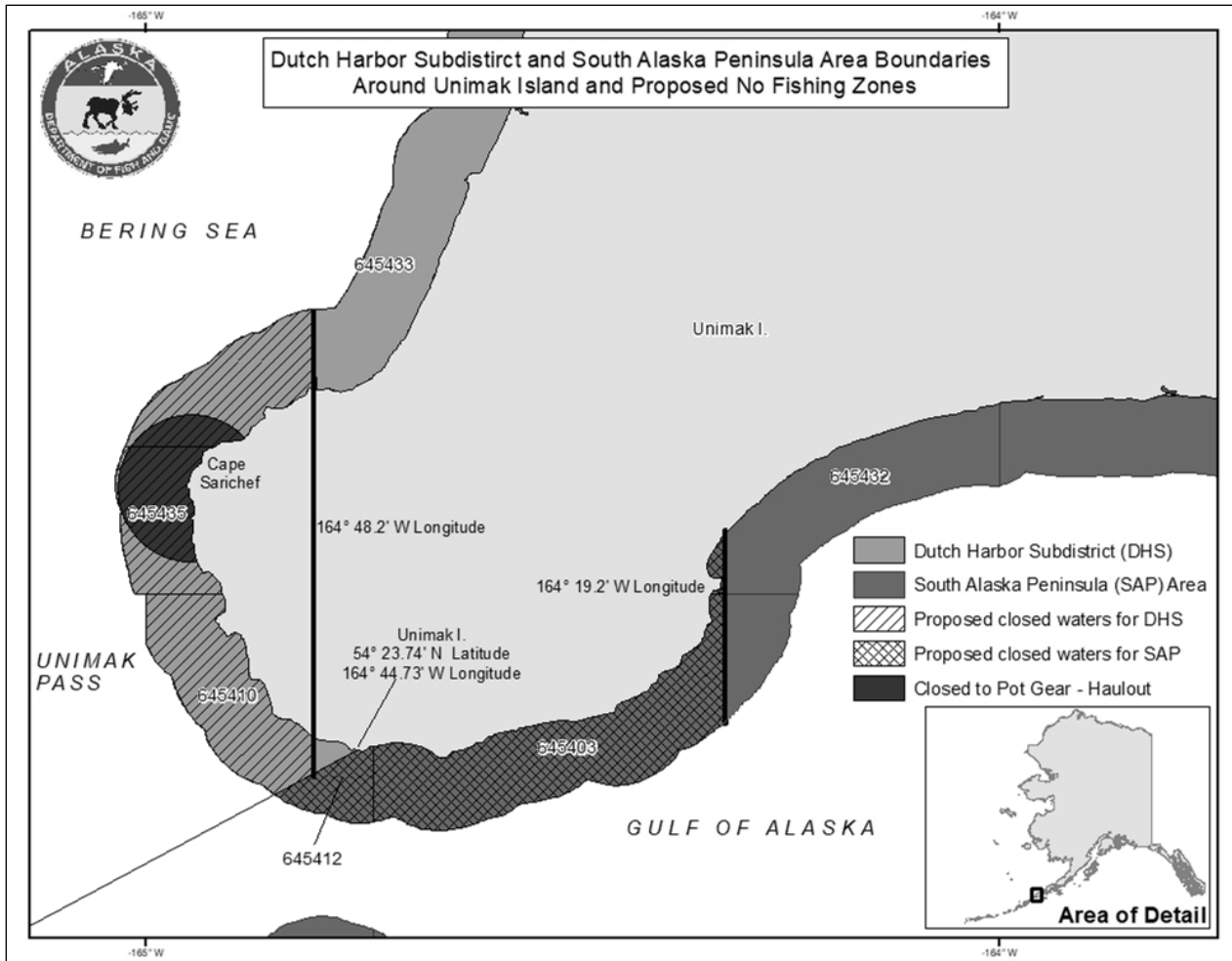


Figure 1.—Map of the Dutch Harbor Subdistrict and South Alaska Peninsula Area around Unimak Island with current sea lion closures and proposed closed waters.

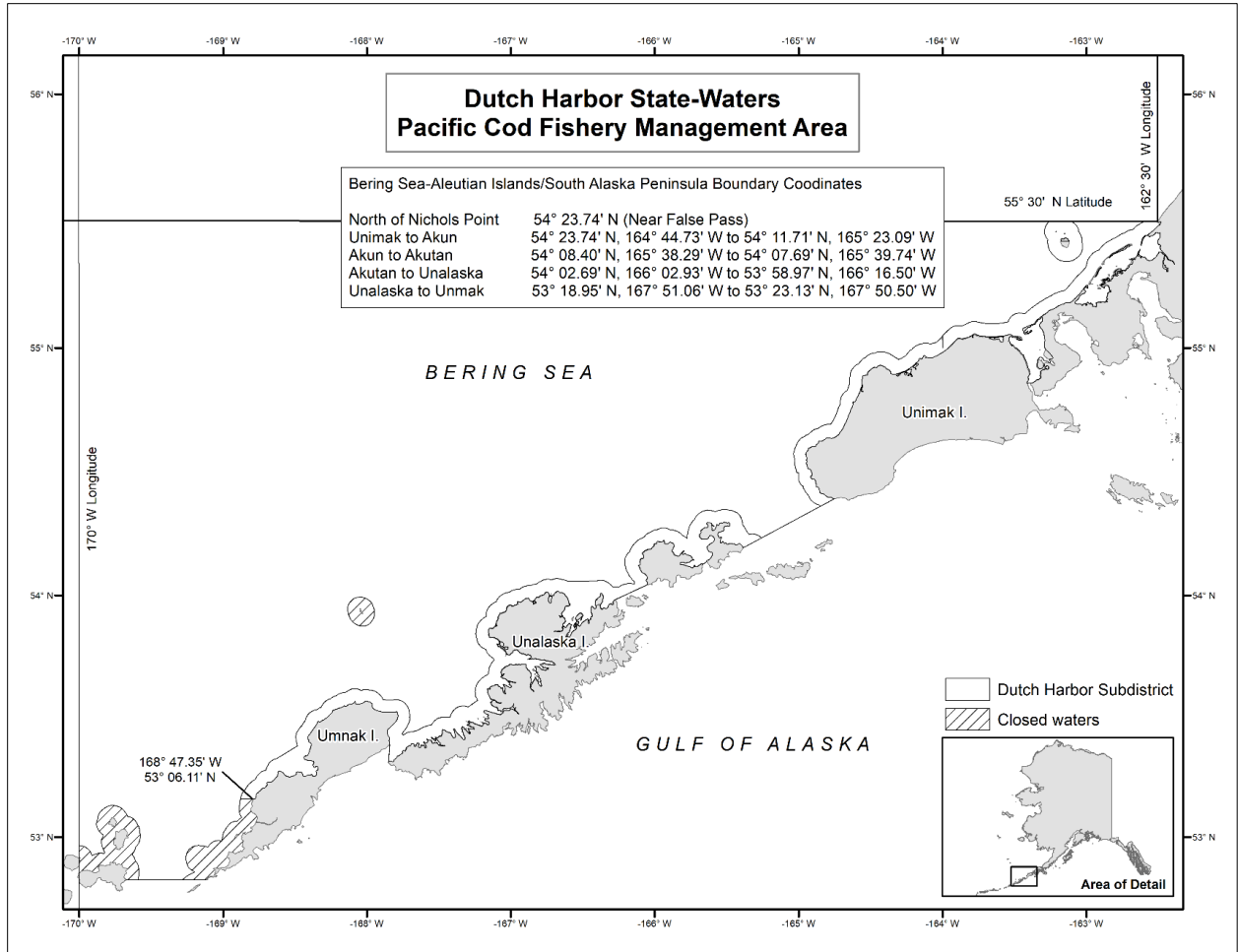


Figure 2.—Dutch Harbor Subdistrict state-waters Pacific cod fishery management area.

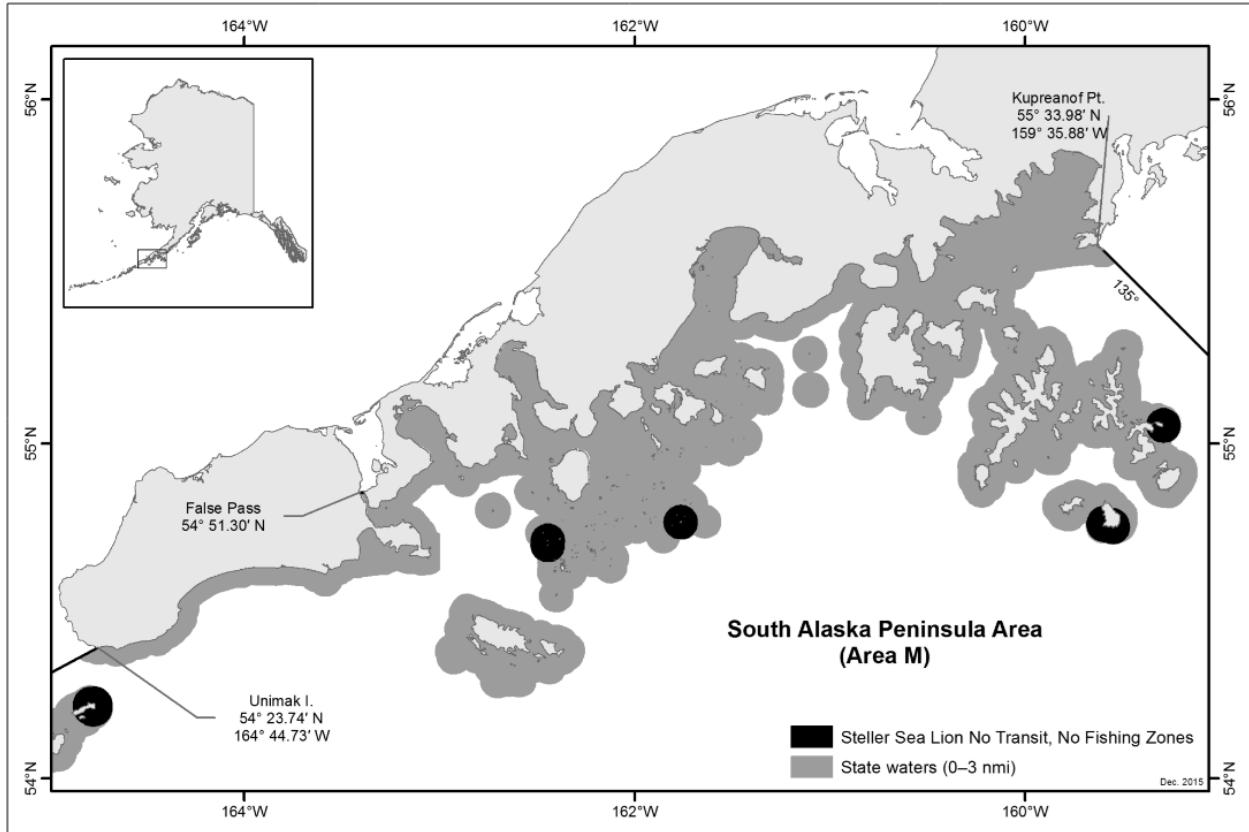


Figure 3.—South Alaska Peninsula Area for state-waters Pacific cod from Kupreanof Point to Unimak Island.

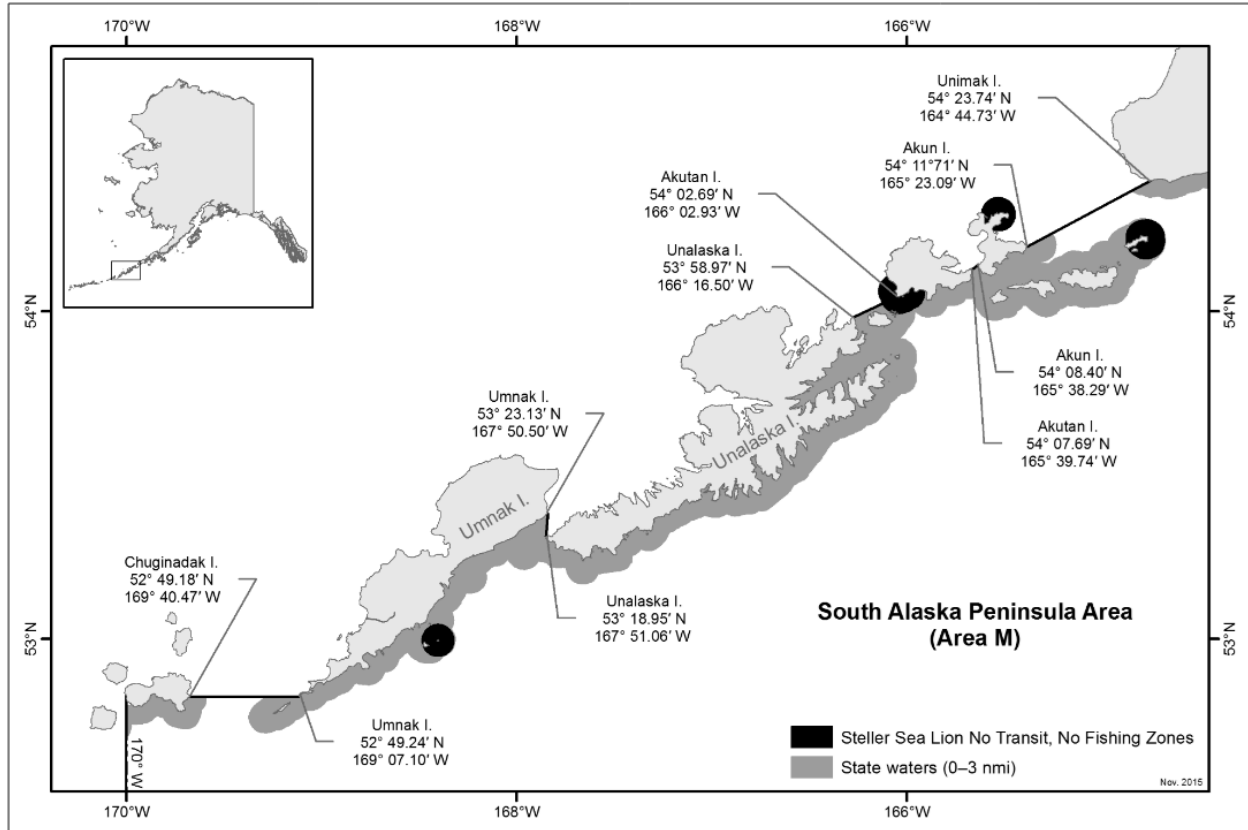


Figure 4.–South Alaska Peninsula Area for state-waters Pacific cod from Unimak Island to 170°W. longitude.

Table 21.—Harvest by year during the Dutch Harbor Subdistrict state-waters Pacific cod pot fishery in statistical areas proposed to be closed (645410, 645433, 645435), by year, 2020–2025.

Year	Statistical area						Total pounds harvested	Total % harvest
	645410		645435		645433			
	Pounds harvested	% of harvest	Pounds harvested	% of harvest	Pounds harvested	% of harvest		
2021	5,459,473	20%	3,834,265	14%	11,044,243	40%	20,337,980	74%
2022	9,134,205	25%	6,489,881	18%	6,378,724	18%	22,002,810	61%
2023	10,555,805	28%	5,973,811	16%	11,757,610	31%	28,287,226	75%
2024	8,361,801	21%	8,849,071	22%	11,894,541	29%	29,105,413	72%
2025 ^a	7,801,320	19%	12,908,716	31%	10,113,790	24%	30,823,826	74%
Average 2021–2025	8,262,521	23%	10,237,782	29%	7,611,149	20%	26,111,451	71%
Total Unimak Pass only	41,312,604	71%	51,188,909	55%	-	-	92,501,513	50%

^a Harvest through September 1, 2025.

Table 22.—Dutch Harbor Subdistrict state-waters Pacific cod pot fishery harvest, effort, and value, 2014–2025.

Year	% of BS			Vessels	Landings	Average		Season dates		Fishery duration ^d
	GHL ^a	ABC	Harvest ^a			price per pound ^b	Fishery value ^c	Opened	Closed	
2014	17,863,874	3% ^c	17,666,510	16	205	\$0.29	\$5.01	11-Feb	1-Sep	203
2015	18,029,404	3% ^c	17,636,103	14	183	\$0.28	\$4.76	9-Feb	31-Mar	51
2016	35,979,072	6%	35,519,920	24	421	\$0.26	\$9.85	12-Feb	22-Apr	71
2017	33,721,562	6%	33,247,414	24	349	\$0.31	\$10.07	9-Feb	8-Apr	59
2018	28,360,000	6%	29,055,603	32	286	\$0.41	\$11.82	30-Jan	1-Mar	31
2019	31,922,600	8%	32,345,033	37	431	\$0.45	\$14.18	19-Jan	24-Feb	37
2020	30,927,000	9%	30,928,649	40	569	\$0.43	\$13.07	26-Jan	12-Mar	60 ^f
2021	27,292,000	10%	27,585,848	29	412	\$0.39	\$10.33	2-Feb	25-Mar	52
2022	37,196,000	11%	35,891,311	29	568	\$0.47	\$16.54	2-Feb	31-Dec	333
2023	38,316,000	12%	37,587,855	26	437	\$0.46	\$16.68	23-Jan	7-Apr	75
2024	44,431,000	12%	40,375,613	22	416	\$0.26	\$10.19	1-Feb	31-Dec	335
2025 ^g	44,026,000	13%	41,849,827	29	544	\$0.36	\$14.64	28-Jan	-	-

Note: GHL = guideline harvest level; CF = confidential.

^a In whole fish pounds.

^b Price per pound of landed weight.

^c Fishery value based on landed weight, in millions of dollars.

^d In days.

^e GHL was set at 3% of the combined federal Bering Sea Subarea and Aleutian Islands Subarea ABC.

^f After the initial season there was about 845,000lbs of the GHL remaining. Interest from vessels warranted a small, 13-day reopening. The fishery reopened after the federal B season on 9/17/2020 and closed again on 9/29/2020.

^g Harvest through September 1, 2025.

Table 23.—South Alaska Peninsula state-waters Pacific cod pot fishery harvest, effort, and value, 1997–2025.

Year	GHL ^a	Harvest ^a	Vessels	Landings	Average	Fishery	Season dates		Season duration ^d
					price per pound ^b		value ^c	Opened	
1997	9,424,762 ^e	9,097,805	51	469	\$0.19	\$1,728,583	4-Apr	22-Dec	263
1998	7,662,497	8,192,803	49	309	\$0.17	\$1,392,777	10-Mar	16-Apr	38
1999	11,071,174	11,115,028	52	388	\$0.29	\$3,223,358	15-Mar	11-Apr	90 ^f
2000	12,883,263	14,286,151	65	505	\$0.32	\$4,571,568	11-Mar	8-Apr	29
2001	11,430,968	10,421,593	55	311	\$0.26	\$2,709,614	6-Mar	13-Apr	39
2002	10,524,455	10,669,572	49	276	\$0.22	\$2,347,306	5-Mar	24-Mar	20
2003	9,650,736	7,927,656	41	191	\$0.27	\$2,140,467	24-Feb	11-Mar	16
2004	10,592,385	10,770,980	43	277	\$0.24	\$2,585,035	2-Mar	24-Mar	23
2005	9,798,776	10,206,340	39	267	\$0.26	\$2,653,648	3-Mar	24-Mar	22
2006	12,581,092	11,640,184	43	350	\$0.38	\$4,423,270	9-Mar	29-Mar	21 ^g
2007	12,581,092	12,423,973	46	406	\$0.47	\$5,839,267	15-Mar	17-Apr	34
2008	12,148,683	11,901,039	48	390	\$0.57	\$6,783,592	7-Mar	1-Apr	26
2009	10,103,758	10,500,742	47	329	\$0.25	\$2,625,186	4-Mar	4-Apr	32
2010	12,969,933	12,973,186	38	240	\$0.26	\$3,373,028	5-Mar	23-Mar	19
2011	14,232,492	14,363,262	49	280	\$0.31	\$4,452,611	25-Feb	11-Mar	15
2012	13,132,496	13,366,884	53	299	\$0.34	\$4,544,741	7-Mar	22-Mar	16
2013	13,248,680	13,384,834	37	248	\$0.27	\$3,613,905	9-Mar	22-Mar	14
2014	18,408,522	18,805,994	38	321	\$0.28	\$5,265,678	7-Mar	24-Mar	18
2015	21,757,443	21,651,744	42	436	\$0.28	\$6,062,488	7-Mar	31-Mar	25
2016	22,769,927	22,390,711	38	498	\$0.27	\$6,045,492	7-Mar	1-Sep	179
2017	20,401,820	20,141,256	42	546	\$0.31	\$6,243,789	7-Mar	1-Sep	179
2018	4,543,482	4,958,500	25	99	\$0.42	\$2,082,570	10-Mar	17-Mar	8
2019	4,291,067	4,716,527	24	93	\$0.47	\$2,216,768	7-Mar	13-Mar	7
2020	1,805,887	1,676,128	19	54	\$0.43	\$720,735	7-Mar	27-Mar	21
2021	4,489,514	4,053,162	28	89	\$0.41	\$1,661,796	9-Mar	15-Mar	7
2022	5,589,124	5,296,833	31	135	\$0.47	\$2,489,512	7-Mar	16-Mar	10
2023	4,196,059	3,980,000	21	78	\$0.46	\$1,830,800	7-Mar	12-Mar	6
2024	4,916,203	4,967,120	9	74	\$0.28	\$1,390,794	7-Mar	28-Mar	22
2025 ^h	4,896,527	5,028,054	20	107	\$0.33	\$1,659,258	7-Mar	18-Mar	12

Note: GHL = guideline harvest level; CF = confidential.

^a In whole fish pounds.

^b Price per pound of landed weight.

^c Fishery value based on landed weight.

^d In days.

^e Total GHL; no GHL allocation by gear type during 1997 season.

^f Quota for the jig sector remained and was rollover to pot vessels. Season reopened 10/31/1999 and closed 12/31/1999.

^g Fishery was closed when the GHL was expected to be achieved; however, enough pounds remained after the initial closure to reopen the fishery again from 4/4/2006 to 4/7/2006.

^h Harvest through September 1, 2025.

PROPOSAL 10 – 5 AAC 28.648. Dutch Harbor Subdistrict Pacific Cod Management Plan.

PROPOSED BY: False Pass Advisory Committee.

WHAT WOULD THE PROPOSAL DO? This would amend the season opening date for the Dutch Harbor Subdistrict (DHS) state-waters Pacific cod pot gear fishery to more closely align with the season opening date of the separate but adjacent South Alaska Peninsula (SAP) state-waters Pacific cod pot gear season.

WHAT ARE THE CURRENT REGULATIONS? Current regulations open the DHS state-waters Pacific cod pot gear fishery 7 days following the closure of the initial season for the federal Bering Sea and Aleutian Islands hook-and-line and pot catcher vessel less than 60 feet in overall length sector.

The SAP state-waters Pacific cod pot gear fishery opens 7 days following the closure of the initial season for the federal Western Gulf of Alaska (WGOA) pot gear sector or March 7, whichever is later. Both state-waters fisheries are open access fisheries with exclusive registration requirements. Vessels participating in both state-waters fisheries are restricted to a maximum of 58 feet in length. Legal gear is restricted to either pot or jig gear. The DHS fishery has separate guideline harvest levels (GHL) for each gear type, while the SAP fishery GHL is allocated between pot and jig gear (85% pot; 15% jig).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, one of 2 regulatory triggers would open the DHS fishery: closure of the federal Bering Sea and Aleutian Islands less than 60-foot hook-and-line and pot gear season or a date certain opening on March 7, whichever is later. Since the federal season traditionally closes in late January or early February, this change would likely result in a March 7 opener for the DHS fishery in most years.

From 2014–2024, the DHS fishery opened on average 35 days prior to the proposed March 7 opening date. On average, the fleet harvested approximately 55% of the GHL each season prior to March 7, with 100% of the GHL being caught before March 7 in 2018 and 2019 (Tables 24 and 25). Pacific cod product quality tends to decrease after spawning and processors typically stop accepting DHS Pacific cod deliveries towards the end of April. Delays in opening the DHS fishery by approximately one month could lead to forgone harvest for the DHS fleet during a time of the year with historically high catch rates and productive fishing. Assuming an approximate forgone harvest of 55% of the GHL, the fleet could realize a loss of approximately \$6.3 million annually based on average price from 2014–2024. Additionally, if the DHS pot fleet is unable to harvest annual GHLs regulatory step-down provisions specified in the fishery management plan would further reduce annual harvest opportunity. GHL step-downs would reallocate Pacific cod ABC to the federal fishery to the benefit of federal users.

Satellite tagging research indicate seasonal movement between the western Gulf of Alaska, eastern Bering Sea, northern Bering Sea, and Russian waters (December 2024 Assessment of the Pacific Cod Stock in the Eastern Bering Sea). Tagged fish generally move northward from winter spawning to summer foraging locations and southward from summer foraging to winter spawning locations. While some tagged fish were observed traveling from the Bering Sea to traditional SAP fishing grounds, tagged fish from SAP were also observed traveling north into the Bering Sea. Thus, the biological and fishery impacts of changing the DHS harvest timing is unknown.

BACKGROUND: The *Dutch Harbor Subdistrict Pacific Cod Management Plan* (5 AAC 28.648) was first adopted in 2013, and the first state-waters season occurred in 2014. The current DHS management plan allocates a proportion of the federal Bering Sea Subarea Pacific cod ABC to the DHS pot gear fishery, allowing the GHL to fluctuate, in part, with Pacific cod abundance in addition to fishery performance. The basis for setting annual GHLs has changed several times since the fishery was established. Currently, the DHS Pacific cod management plan sets the GHL at 10% of the Bering Sea Subarea ABC with a 1% step-up provision allowing for a maximum GHL of 15% of the Bering Sea Subarea ABC. The step-up provision requires the pot GHL to be achieved for two consecutive years before a 1% GHL step-up can occur. Conversely, a 1% step-down will occur if the GHL is not achieved for two consecutive seasons to a minimum GHL based on 10% of the Bering Sea Subarea Pacific cod ABC. The GHL is considered to have been achieved if, by November 15, 90 percent of the GHL has been harvested or projected to be harvested by the end of the calendar year.

The North Pacific Fishery Management Council (NPFMC) annually adopts separate Pacific cod acceptable biological catch (ABC) levels for the federal Bering Sea Subarea and WGOA management area. State and federal Pacific cod removals (GHL + TAC) are coordinated to not exceed the annual Pacific cod ABC. Currently there is no provision to reallocate any forgone DHS harvest to the federal Bering Sea Pacific cod fisheries or to the adjacent South Alaska Peninsula Area state-waters fishery.

The DHS GHL has been achieved every year since the inception of the fishery with annual harvest ranging from 17.6 million to 41.8 million pounds. On average, 31.6 million pounds of Pacific cod were harvested annually from 2014–2025 (Table 24). Vessel participation ranged from 14 to 40 vessels, with an average of 27 vessels participating in the most recent five seasons. Current processing of DHS Pacific cod primarily occurs in the ports of Akutan and Dutch Harbor.

Average DHS season duration from 2020–2024 was 171 days although weekly harvest rates typically peak from February through mid-March, corresponding with the offshore to nearshore migration of Pacific cod ahead of spawning. Average fishery value from 2021–2025 was \$13.7 million. The 2025 GHL was set at 44,026,000 pounds and as of September 1, 2025, 95% of the GHL has been harvested (Table 24). At 44.0 million pounds, the 2025 DHS fishery is the largest state-waters Pacific cod fishery in the state.

Vessels participating in the DHS state-waters Pacific cod pot fishery are primarily homeported in other Alaska communities. Vessels typically travel to the Bering Sea in late December to participate in the federal Pacific cod pot gear season that opens January 1. Most vessels that fish in the federal Bering Sea pot gear fishery transition to the DHS state-waters fishery that opens a week after the federal season closes. In response to a potential month-long standdown between the federal and DHS state-waters seasons, vessels would likely transition to the adjacent WGOA federal/parallel pot gear fishery which would increase competition for traditional participants of that fishery, travel back to their homeports, or moor vessels in Dutch Harbor and fly crews home which would increase overall operating expenses for the season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Depending on when the federal season closes, approval of this proposal may result in additional mooring and travel costs if a person wishes to participate in the federal and state-waters fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

Table 24.—Dutch Harbor Subdistrict state-waters Pacific cod pot fishery harvest, effort, and value, 2014–2025.

Year	GHL ^a	% of BS		Vessels	Landings	Average price per pound ^b	Fishery value ^c	Season dates		Fishery duration ^d
		ABC	Harvest ^a					Opened	Closed	
2014	17,863,874	3% ^e	17,666,510	16	205	\$0.29	\$5.01	11-Feb	1-Sep	203
2015	18,029,404	3% ^e	17,636,103	14	183	\$0.28	\$4.76	9-Feb	31-Mar	51
2016	35,979,072	6%	35,519,920	24	421	\$0.26	\$9.85	12-Feb	22-Apr	71
2017	33,721,562	6%	33,247,414	24	349	\$0.31	\$10.07	9-Feb	8-Apr	59
2018	28,360,000	6%	29,055,603	32	286	\$0.41	\$11.82	30-Jan	1-Mar	31
2019	31,922,600	8%	32,345,033	37	431	\$0.45	\$14.18	19-Jan	24-Feb	37
2020	30,927,000	9%	30,928,649	40	569	\$0.43	\$13.07	26-Jan	12-Mar	60 ^f
2021	27,292,000	10%	27,585,848	29	412	\$0.39	\$10.33	2-Feb	25-Mar	52
2022	37,196,000	11%	35,891,311	29	568	\$0.47	\$16.54	2-Feb	1-Feb	333
2023	38,316,000	12%	37,587,855	26	437	\$0.46	\$16.68	23-Jan	7-Apr	75
2024	44,431,000	12%	40,375,613	22	416	\$0.26	\$10.19	1-Feb	31-Dec	335
2025 ^g	44,026,000	13%	41,849,827	29	544	\$0.36	\$14.64	28-Jan	-	-

Note: GHL = guideline harvest level; CF = confidential.

^a In whole fish pounds.

^b Price per pound of landed weight.

^c Fishery value based on landed weight, in millions of dollars.

^d In days.

^e GHL was set at 3% of the combined federal Bering Sea Subarea and Aleutian Islands Subarea ABC.

^f After the initial season there was about 845,000lbs of the GHL remaining. Interest from vessels warranted a small, 13-day reopening. The fishery reopened after the federal B season on 9/17/2020 and closed again on 9/29/2020.

^g Harvest through September 1, 2025.

Table 25.—Dutch Harbor Subdistrict state-waters Pacific cod pot fishery harvest before and after March 7, 2014–2025.

Year	Pounds harvested		Percent harvest		Total harvest	Vessels
	Prior to March 7	On or after March 7	Prior to March 7	On or after March 7		
2014	4,799,386	12,773,010	27%	73%	17,572,396	16
2015	10,143,091	7,493,012	58%	42%	17,636,103	14
2016	11,079,985	24,439,935	31%	69%	35,519,920	24
2017	14,215,645	19,031,770	43%	57%	33,247,414	24
2018	29,055,603	0	100%	0%	29,055,603	32
2019	32,345,033	0	100%	0%	32,345,033	37
2020	22,692,782	8,235,866	73%	27%	30,928,649	40
2021	13,785,740	13,800,108	50%	50%	27,585,848	29
2022	13,773,812	22,117,499	38%	62%	35,891,311	29
2023	17,034,858	20,552,996	45%	55%	37,587,855	26
2024	16,322,089	24,053,525	40%	60%	40,375,613	22
2025 ^a	21,786,702	20,063,125	52%	48%	41,849,827	29
Average	17,252,894	14,380,071	55%	45%	31,632,964	27

^a Harvest through September 1, 2025.

CLOSED WATERS IN BERING SEA-ALEUTIAN ISLANDS AREA (1 PROPOSAL)

PROPOSAL 11 – 5 AAC 28.650. Closed waters in Bering Sea-Aleutian Islands.

PROPOSED BY: Linda Kozak.

WHAT WOULD THE PROPOSAL DO? This would amend closed waters for the Aleutian Islands District to close all waters of Alaska (0–3 nmi) west of 170° W. long to groundfish fishing with pelagic and nonpelagic trawl gear. Final deliberation of this proposal is scheduled for the March 2026 Statewide Finfish and Supplemental Issues meeting.

WHAT ARE THE CURRENT REGULATIONS? Trawl gear is a legal gear type for commercial groundfish fisheries inside state waters (0–3 nmi) of the Aleutian Islands District west of 170° W. long. Several distinct commercial groundfish fisheries occur in this area; the state-managed Aleutian Islands Subdistrict (AIS) Pacific cod fishery and Aleutian Islands District parallel groundfish trawl fisheries that occur concurrent to the adjacent (3–200 nmi) federal fisheries. Parallel fisheries target multiple groundfish species using both pelagic and nonpelagic trawl gear (Figure 5). The AIS state-waters Pacific cod fishery is managed exclusively by the Alaska Department of Fish and Game (ADF&G) under the *Aleutian Islands Subdistrict Pacific Cod Management Plan* (5 AAC 28.647; Figure 6). The parallel fishery is managed by ADF&G, by adopting most federal management measures and inseason management actions (5 AAC 28.086).

At the beginning of each year, ADF&G issues an emergency order opening the parallel groundfish season in state waters to coincide with federal groundfish seasons in adjacent waters of the exclusive economic zone (EEZ; 3–200 nmi).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Closing state waters west of 170°W. long to pelagic and nonpelagic trawl gear would eliminate groundfish harvest opportunity for vessels using nonpelagic trawl gear in the AIS state-waters Pacific cod fishery, and for vessels using pelagic and nonpelagic trawl gear in multiple parallel groundfish trawl fisheries west of 170°W. long (Tables 26, 27, and 28). The *Aleutian Islands Subdistrict Pacific Cod Management Plan* (5 AAC 28.647) would need to be amended to remove nonpelagic trawl as a legal gear type—leaving pot, longline, and jig as legal gear types.

In total, state waters of the Aleutian Islands District west of 170° W long encompasses approximately 6,966 square miles although not all state waters are open to trawl fishing due to Steller sea lion (SSL) no fishing zones and habitat protection areas. Within the proposed state waters closures area, 391 square miles (6%) is open to fishing for Atka mackerel with nonpelagic trawl gear, 1,537 square miles (22%) is open to fishing for Pacific cod with nonpelagic trawl gear, 2,277 square miles (33%) is open to fishing for non-SSL prey species (species other than walleye pollock/Atka mackerel/Pacific cod) with nonpelagic trawl gear, and 2,650 square miles (38%) is open to fishing for walleye pollock with pelagic trawl gear (Table 29, Figures 7, 8, 9, and 10). Closing state waters west of 170° W. long to trawl gear would translate to a 100% reduction in available fishing area for the state-waters and parallel trawl fisheries. Current parallel groundfish trawl effort and catch would redistribute to adjacent federal waters.

Based on the language found in the proposal, the proponent seeks to close state waters west of 170° W. long to trawl gear (pelagic and nonpelagic) citing concern over the spatial overlap

between large catcher-processor groundfish trawl vessels operating inside state waters and golden king crab habitat relative to the directed Aleutian Islands golden king crab fishery (AIG; Figures 11 and 12). Closing state waters to trawl gear would reduce trawl bycatch of golden king crab inside state-waters (0–3 nmi) and reduce implied negative impacts of nonpelagic trawl gear to golden king crab seafloor habitat (Table 30). The degree to which prohibiting trawl gear inside state waters would benefit golden king crab stock health or habitat is difficult to assess and is largely unknown.

BACKGROUND: Three types of groundfish trawl fisheries (federal, parallel, and state waters) occur in waters of the Aleutian Islands District west of 170° W. longitude.

- The federal fishery is managed exclusively by the National Marine Fisheries Service (NMFS) and prosecuted in federal waters (3–200 nmi). Harvest in this fishery is deducted from the federal total allowable catch (TAC) established for each species (e.g. Atka mackerel, Pacific Ocean perch, walleye pollock, Northern rockfish, Pacific cod, and several species of flounder).
- Concurrent to the federal fishery, the state opens parallel fisheries inside waters under state jurisdiction (0–3 nmi). The state adopts most federal rules and management actions inside state waters by emergency order during parallel fisheries. Harvest in these fisheries is deducted from the federal TACs established for each species (e.g. Atka mackerel, Pacific Ocean perch, walleye pollock, Northern rockfish, Pacific cod, and several species of flounder).
- A separate state-waters fishery for Pacific cod only is also prosecuted from 0–3 nmi but is managed exclusively by the state according to board regulations. Harvest in this fishery is deducted from the state-waters guideline harvest level (GHL).

Trawl harvest of Pacific cod in the AIS state-waters fishery is largely confidential due to limited vessel and processor participation (Table 26). However, average annual trawl harvest from 2020–2025 AIS Pacific cod fisheries was 1,095,802 pounds, with an average of 4 vessels participating each year. Average fishery value of trawl-caught Pacific cod during these years was \$473,963. The 2025 season is ongoing with trawl harvest from two vessels as of August 15; harvest is confidential (Table 27).

Atka mackerel, Pacific Ocean perch, walleye pollock, Pacific cod, and several species of flounder dominate the federal and parallel trawl harvest by volume. Combined harvest of these species in state waters averaged less than 1% (1.81 million pounds) of the overall federal fishery catch from 2020–2025, with an average of 99% (243.1 million pounds) occurring in federal waters (Table 28). Trawl harvest of top species (by volume) occurred year-round from 2020–2025. Vessels participating in Aleutian Islands trawl fisheries from 2020–2025 range in size from 58 feet to 295 feet in overall length, averaging 190 feet in length. Most vessels operate as large factory trawlers that catch and process at sea. Average exvessel value for these fisheries does not readily translate given the mixed participation and differing product lines from motherships, catcher-processors, and catcher-vessels.

The Aleutian Islands golden king crab fishery was rationalized prior to the 2005/06 season and the stock is comanaged by ADF&G and the National Marine Fisheries Service (NMFS). Aleutian Islands golden king crab are considered a single stock but managed separately east and west of 174° W. long, with separate TACs established for each area (Figure 11). Crab catcher-vessels use

longline king crab pot gear with up to 80 pots per string and set multiple strings of pots that cover different depths across an extensive area. On average over the last 5 seasons, individual vessels fished 1,854 pots east of 174° W. long and 1,947 pots west of 174° W. longitude. Directed fishing for golden king crab takes place within a fixed 9-month regulatory season running August 1 through April 30 each year.

Directed fishery harvest of golden king crab inside state waters from 2020/21–2024/25 averaged 12.6% (696 thousand pounds) of the total annual directed catch while 87.4% (4.8 million pounds) of the total catch originated from federal waters (Table 31). An average of 5 vessels participated in golden king crab fishery for the past five seasons. Recent average exvessel value of the AIG fishery was \$28.9 million (Table 31).

Reported bycatch of golden king crab inside state waters west of 170° W. long by trawl gear vessels (based on ADF&G fish tickets) is generally low. From 2020–2025, an average of 66 golden king crab (1%) were annually reported as bycatch by trawl vessels operating inside state waters while the remaining 99% or 5,362 crab caught as bycatch were reported from vessels operating in federal waters (Table 30). Comparable federal data indicates a similar pattern of state/federal golden king crab trawl bycatch. Unobserved bycatch and mortality of golden king crab by trawl gear also occurs but is generally unquantified for king crab in the Aleutian Islands. No golden king crab were reported to be caught with trawl gear in the AIS state-waters Pacific cod fishery from 2020–2025.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional direct cost for the department.

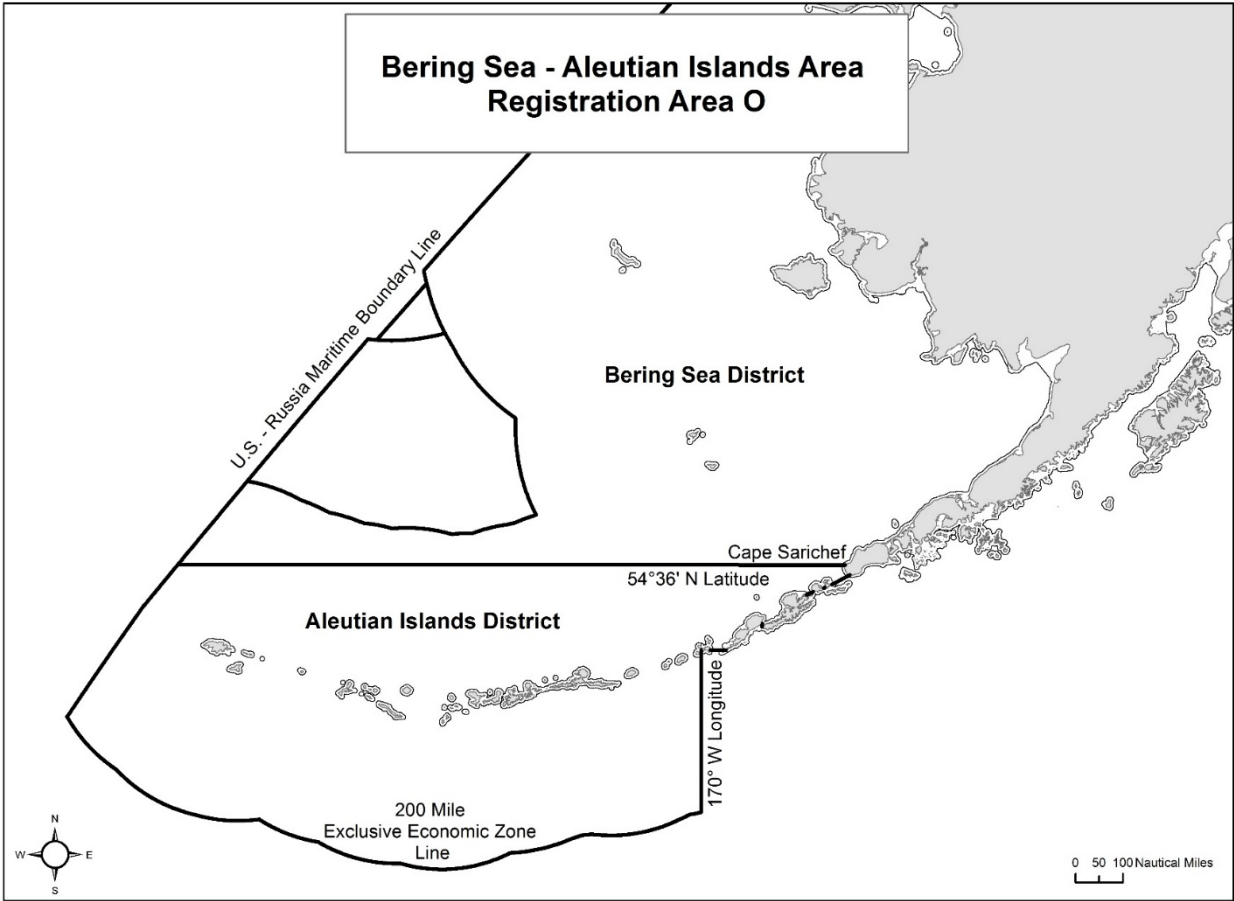


Figure 5.—Bering Sea-Aleutian Islands Groundfish Registration Area O.

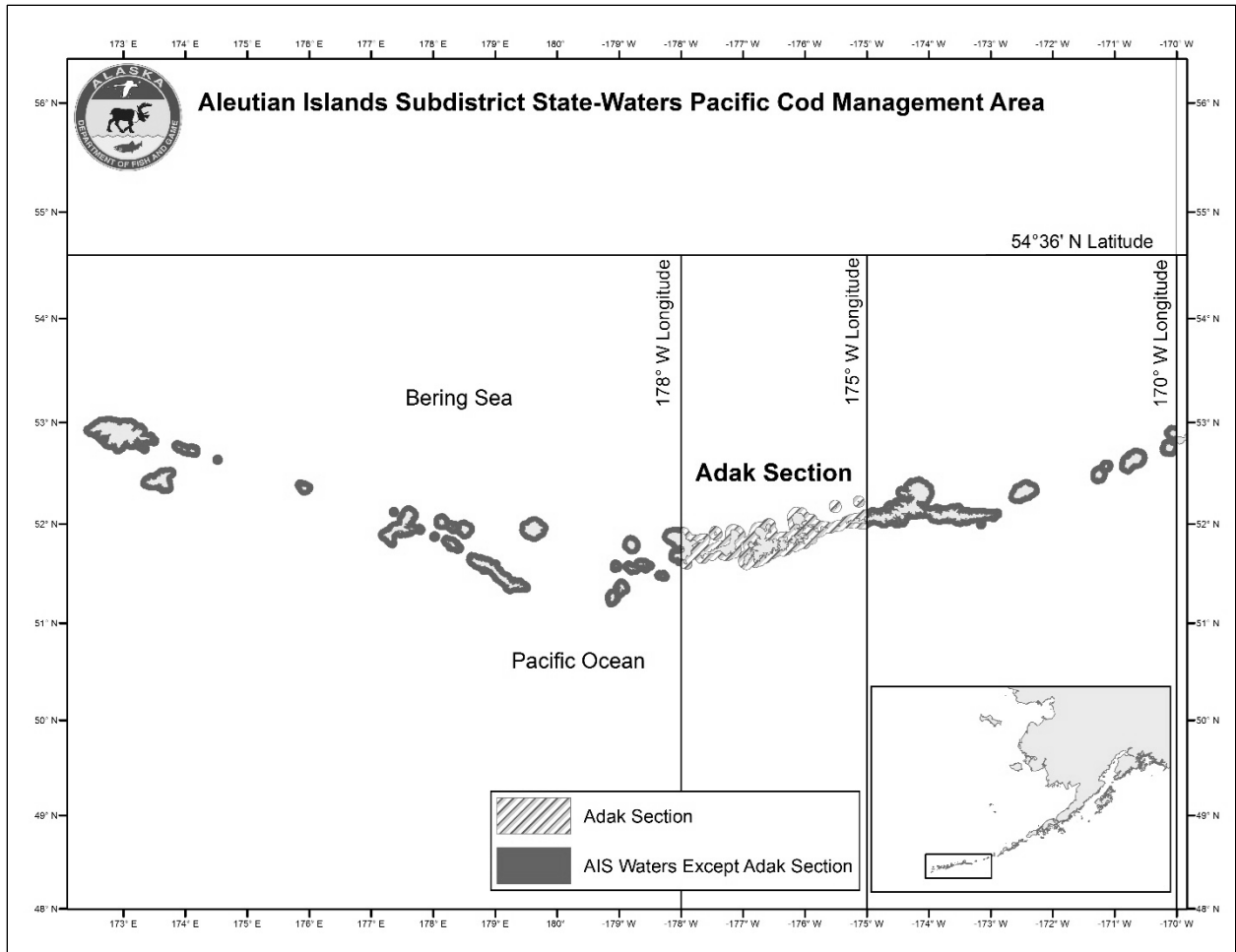


Figure 6.—Aleutian Islands Subdistrict state-waters Pacific cod fishery management area.

Table 26.—Aleutian Islands Subdistrict (AIS) state-waters Pacific cod fishery harvest by gear type, 2006–2024.

Year	Season	Longline ^a	Trawl ^a	Pot ^a	Jig ^a	Total ^a
2006	A season	CF	7,053,035	CF	0	8,502,781
	B season	76,462	0	274,952	0	351,414
2007	A season	0	6,998,224	1,231,707	0	8,229,931
	B season	CF	0	2,383,163	CF	3,409,070
2008	A season	CF	6,130,304	CF	0	7,477,507
	B season	362,410	0	3,786,710	92,572	4,241,692
2009	A season	CF	1,295,595	3,879,737	CF	5,537,886
	B season	CF	0	0	CF	CF
2010	A season	0	4,899,783	3,059,731	0	7,959,515
	B season	CF	0	CF	0	826,170
2011	A season	0	CF	CF	0	CF
	B season	CF	0	CF	0	CF
2012	A season	CF	5,983,213	CF	0	11,462,339
	B season	274,856	0	555,369	48,462	878,688
2013	A season	0	CF	CF	0	CF
	B season	CF	0	0	0	CF
2014	A season	0	CF	CF	0	CF
	B season	0	0	0	0	0
2015	A season	0	CF	0	0	CF
	B season	0	0	0	0	0
2016	b	0	CF	0	0	CF
2017	b	0	0	CF	0	CF
2018	b	0	CF	CF	0	CF
2019	b	0	CF	CF	0	13,664,555
2020	b	CF	CF	11,650,833	0	14,907,703
2021	b	0	CF	CF	0	14,777,163
2022	b	0	CF	CF	0	CF
2023	b	0	CF	CF	0	9,926,149
2024	b	0	0	0	0	0

Note: CF = confidential.

^a In whole fish pounds.

^b In 2016, regulation changed to only one season for Aleutian Island Subdistrict state-waters Pacific cod.

Table 27.—Aleutian Islands Subdistrict state-waters Pacific cod fishery harvest and value by trawl gear, 2020–2025.

Season	Vessels	Landings	Harvest ^a	Exvessel ^b	Fishery value ^c
2020	6	34	CF	CF	CF
2021	5	18	CF	CF	CF
2022	5	15	CF	CF	CF
2023	3	19	CF	CF	CF
2024	0	0	0	N/A	N/A
2025 ^d	2	7	CF	CF	CF
Average	4	16	1,095,802	\$0.35	\$473,963

Note: CF = confidential; N/A = not applicable.

^a Harvest in whole fish pounds.

^b Average initial price per pound of landed weight.

^c Fishery value based on landed weight and average initial price per pound.

^d Harvest through August 15, 2025.

Table 28.—Federal and parallel groundfish fishery harvest by trawl gear in waters of Aleutian Islands District west of 170°W. long, top five harvested species by weight, 2020–2025.

Year	Species	Vessels	Landings	State-waters harvest		Federal-waters harvest	
				Pounds	% State waters	Pounds	% Federal waters
2020	Atka mackerel	15	519	493,793	0.4%	133,655,641	99.6%
	Pacific Ocean perch	18	592	1,225,731	1.9%	64,681,575	98.1%
	Northern rockfish	15	512	36,282	0.2%	18,619,256	99.8%
	Kamchatka flounder	15	210	46,114	0.5%	10,126,285	99.5%
	Pacific cod	18	500	34,043	0.5%	7,137,897	99.5%
	Other ^a	18	603	580,353	2.6%	22,023,685	97.4%
	Total	18	623	2,416,315	0.9%	256,244,338	99.1%
2021	Atka mackerel	17	429	996,573	0.7%	136,612,965	99.3%
	Pacific Ocean perch	21	465	1,285,372	2.2%	56,329,334	97.8%
	Northern rockfish	17	397	45,005	0.3%	12,833,817	99.7%
	Kamchatka flounder	15	196	294,735	3.0%	9,590,423	97.0%
	Pacific cod	21	430	40,119	0.6%	6,471,080	99.4%
	Other ^a	21	495	515,882	2.9%	17,071,761	97.1%
	Total	21	520	3,177,686	1.3%	238,909,381	98.7%
2022	Atka mackerel	15	388	1,360,466	1.1%	125,260,951	98.9%
	Pacific Ocean perch	15	409	1,003,821	1.8%	55,963,917	98.2%
	Northern rockfish	15	352	46,010	0.3%	16,881,251	99.7%
	Kamchatka flounder	15	171	13,603	0.1%	12,748,931	99.9%
	Pacific cod	18	380	53,535	0.7%	7,237,112	99.3%
	Other ^a	18	433	206,964	1.0%	20,460,308	99.0%
	Total	18	448	2,684,399	1.1%	238,552,470	98.9%
2023	Atka mackerel	17	449	594,095	0.4%	140,686,561	99.6%
	Pacific Ocean perch	18	428	1,081,199	1.9%	56,355,344	98.1%
	Northern rockfish	17	388	152,215	0.7%	20,346,262	99.3%
	Kamchatka flounder	16	182	3,232	0.0%	10,343,058	100.0%
	Pacific cod	19	398	54,026	0.7%	7,551,363	99.3%
	Other ^a	19	498	166,024	0.6%	25,402,784	99.4%
	Total	19	509	2,050,792	0.8%	260,685,372	99.2%
2024	Atka mackerel	15	460	50,210	0.0%	156,768,273	100.0%
	Pacific Ocean perch	16	440	172,724	0.3%	59,912,023	99.7%
	Northern rockfish	15	388	2,482	0.0%	19,196,525	100.0%
	Arrowtooth flounder	16	261	350	0.0%	9,602,110	100.0%
	Walleye pollock	16	243	55,663	0.6%	8,840,973	99.4%
	Other ^a	16	525	4,137	0.0%	28,877,061	100.0%
	Total	16	526	285,565	0.1%	283,196,966	99.9%

-continued-

Table 28.—Page 2 of 2.

Year	Species	Vessels	Landings	State-waters harvest		Federal-waters harvest	
				Pounds	% State waters	Pounds	% Federal waters
2025 ^b	Atka mackerel	13	288	169,698	0.1%	118,792,937	99.9%
	Pacific Ocean perch	13	251	95,251	0.4%	22,569,700	99.6%
	Northern rockfish	13	244	626	0.0%	11,498,270	100.0%
	Pacific cod	13	245	3,098	0.0%	6,765,659	100.0%
	Walleye pollock	13	121	137	0.0%	5,991,893	100.0%
	Other ^a	13	276	4,540	0.0%	15,307,595	100.0%
	Total	13	275	273,350	0.2%	180,926,055	99.8%
	2020–2025 avg.	18	484	1,814,685	0.7%	243,085,764	99.3%

^a Combination of all other groundfish species.

^b Harvest through August 15, 2025.

Table 29.—Area of state-waters in Aleutian Islands District west of 170° W. longitude open to trawl gear, by species.

Species	Aleutian Islands District West of 170° W. longitude	
	Area of state-waters open to trawl ^a	Percentage of total state-waters area
Atka mackerel	391	6%
Pacific cod	1,537	22 %
Walleye pollock	2,650	38%
Other ^b	2,277	33%

Note: Total area of state-waters in Aleutian Islands District west of 170° W. longitude is 6,966 square miles.

^a Calculation of area in square miles.

^b All federal non-SSL groundfish prey species.

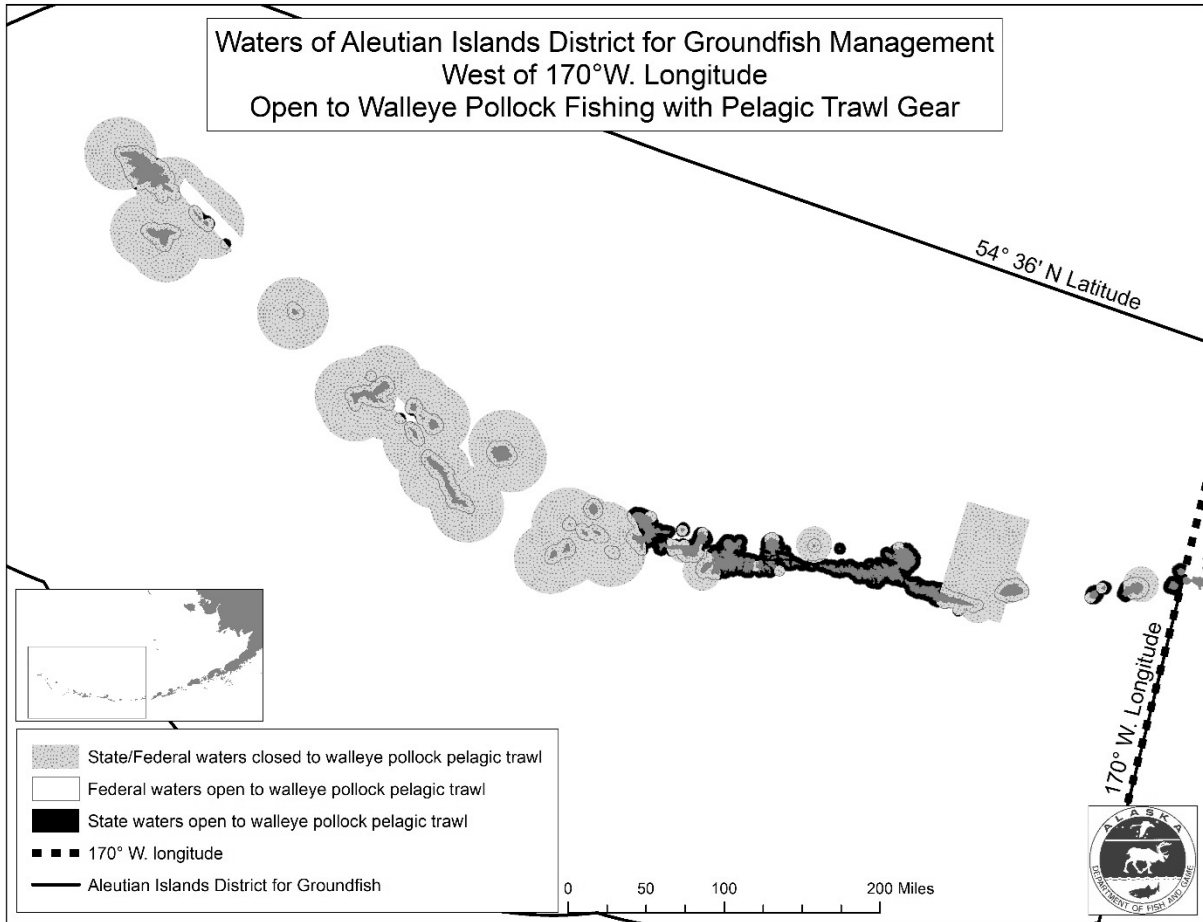


Figure 7.—Aleutian Islands District for groundfish management west of 170° W longitude open to walleye pollock fishing with pelagic trawl gear.

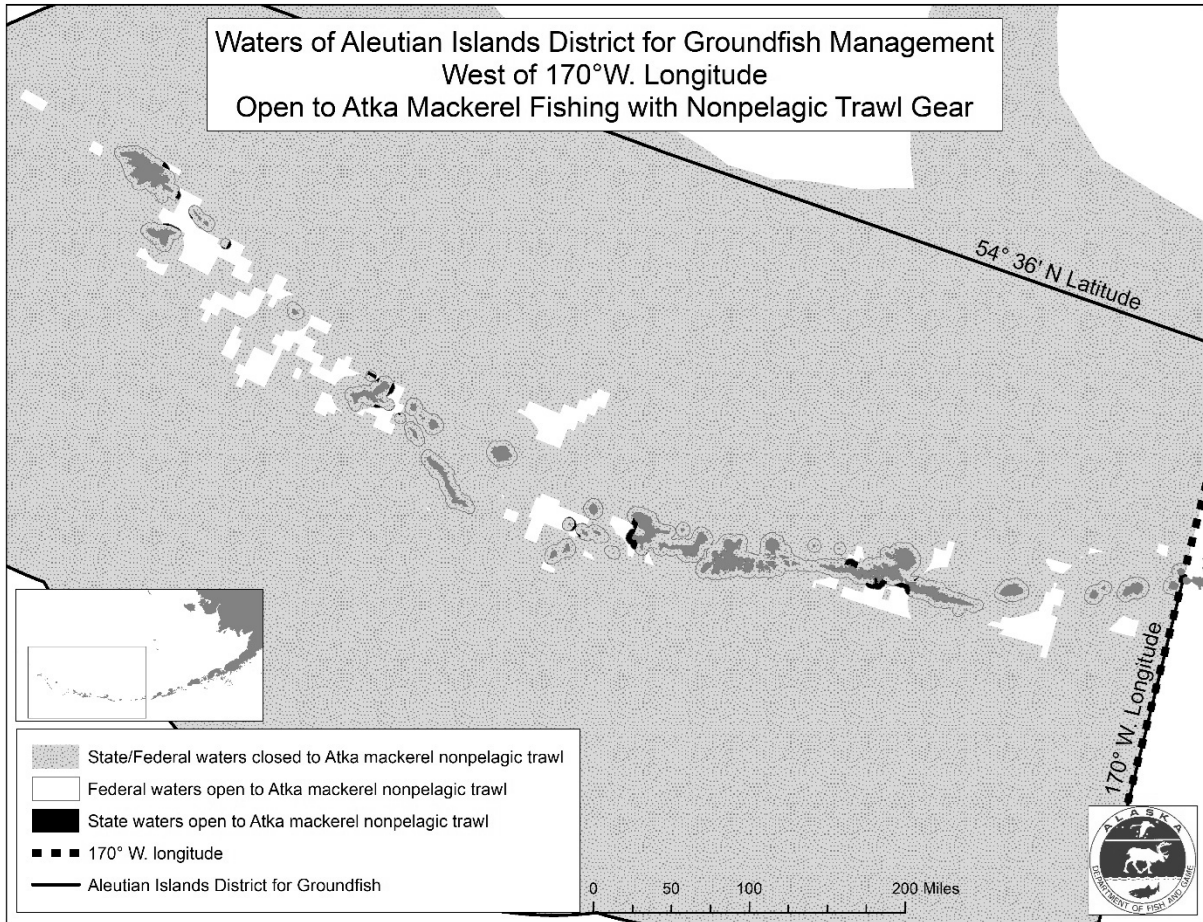


Figure 8.—Aleutian Islands District for groundfish management west of 170° W longitude open to Atka mackerel fishing with nonpelagic trawl gear.

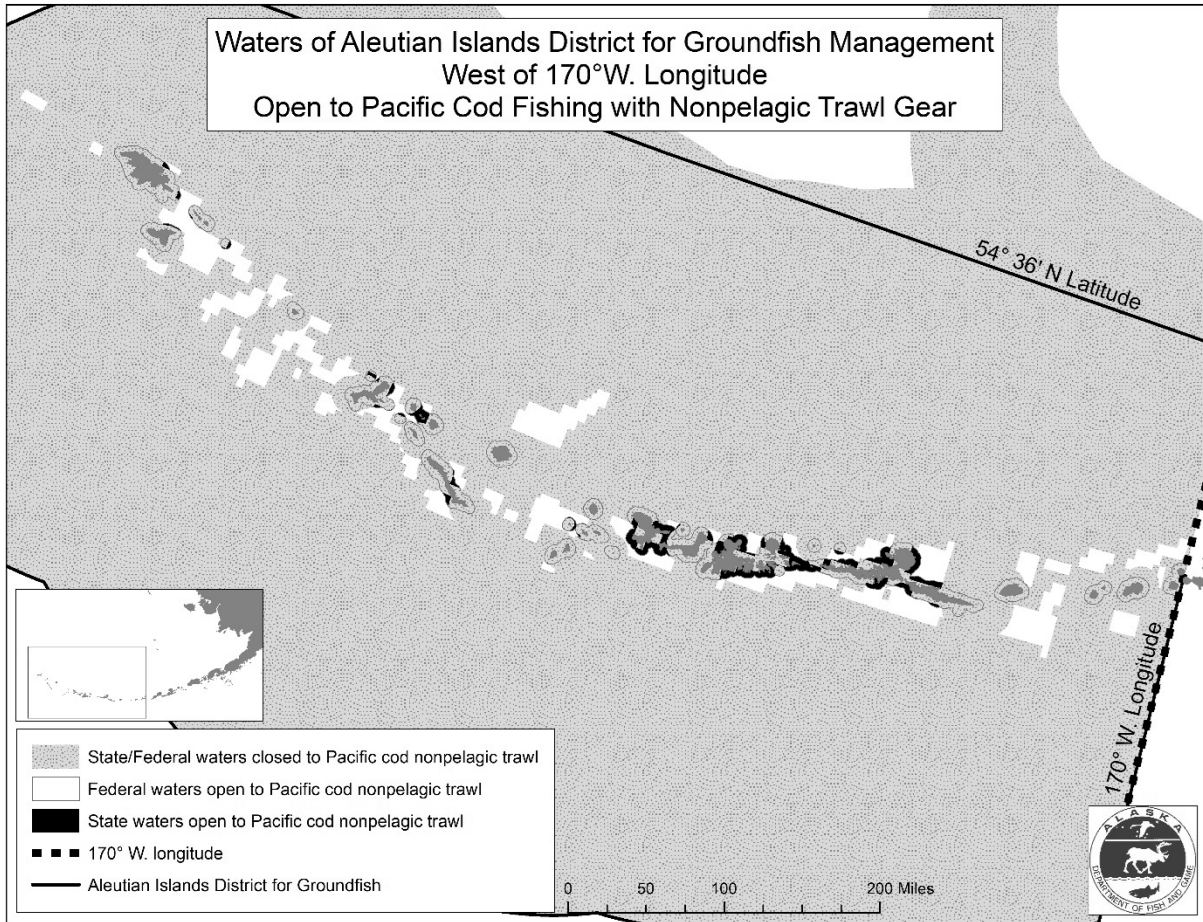


Figure 9.—Aleutian Islands District for groundfish management west of 170° W longitude open to Pacific cod fishing with nonpelagic trawl gear.

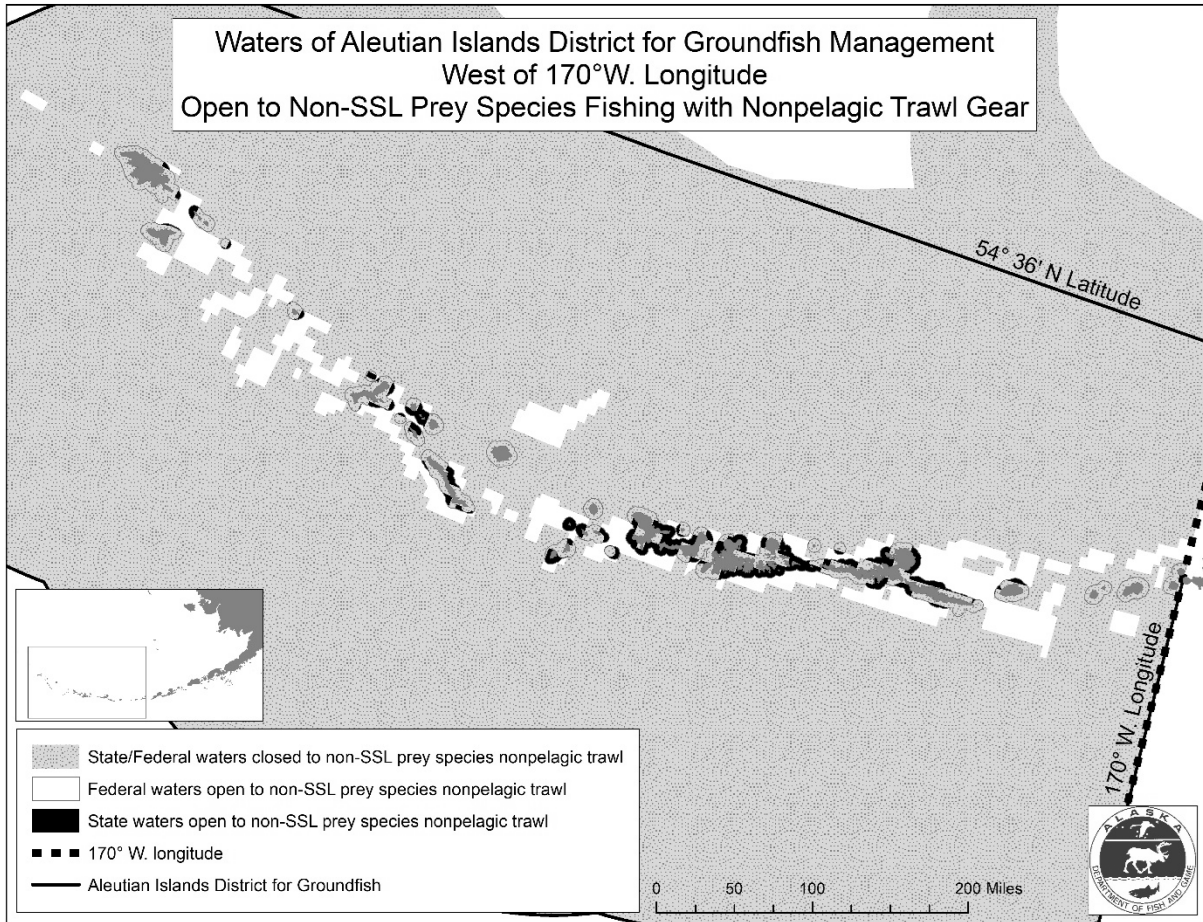


Figure 10.—Aleutian Islands District for groundfish management west of 170° W longitude open to non-SSL prey species (species other than walleye pollock/Atka mackerel/Pacific cod) fishing with nonpelagic trawl gear.

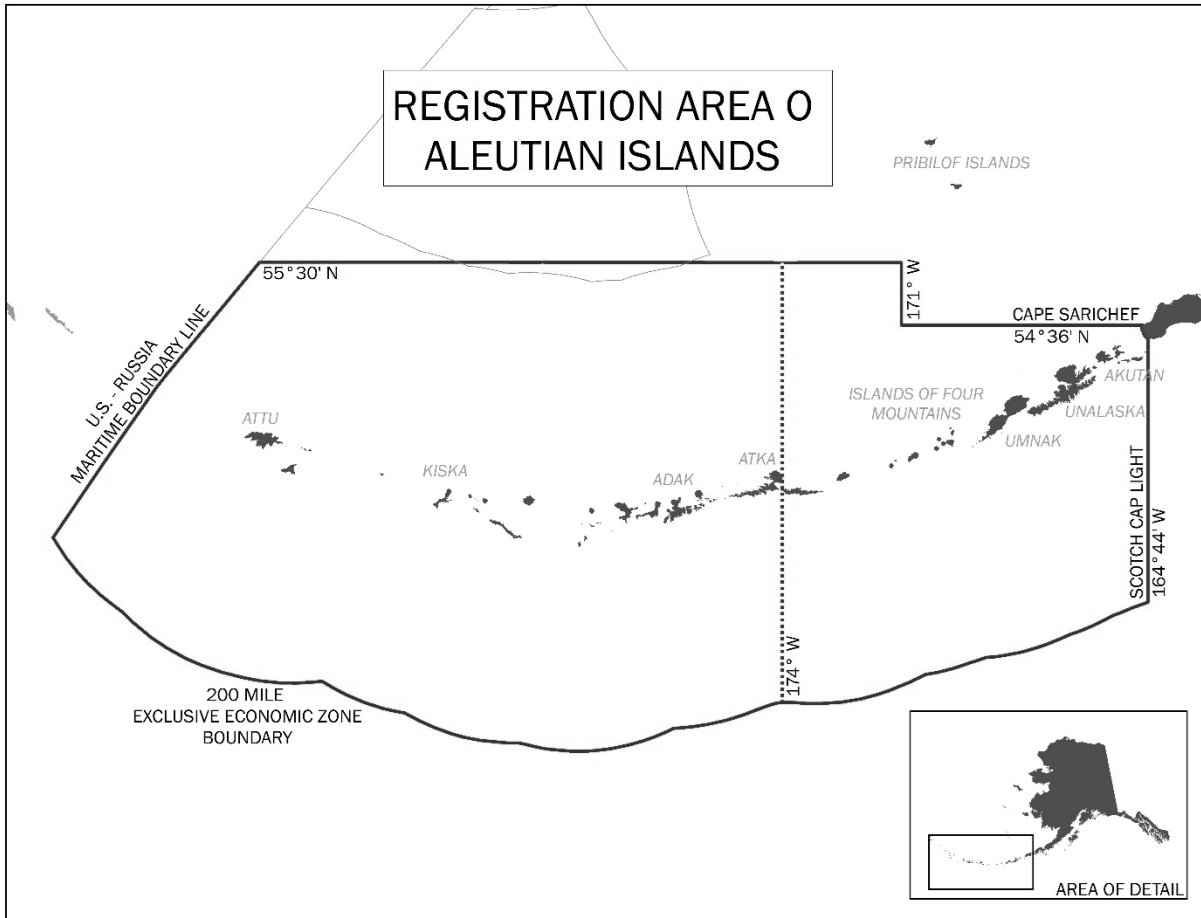


Figure 11.—King Crab Registration Area O – Aleutian Islands.

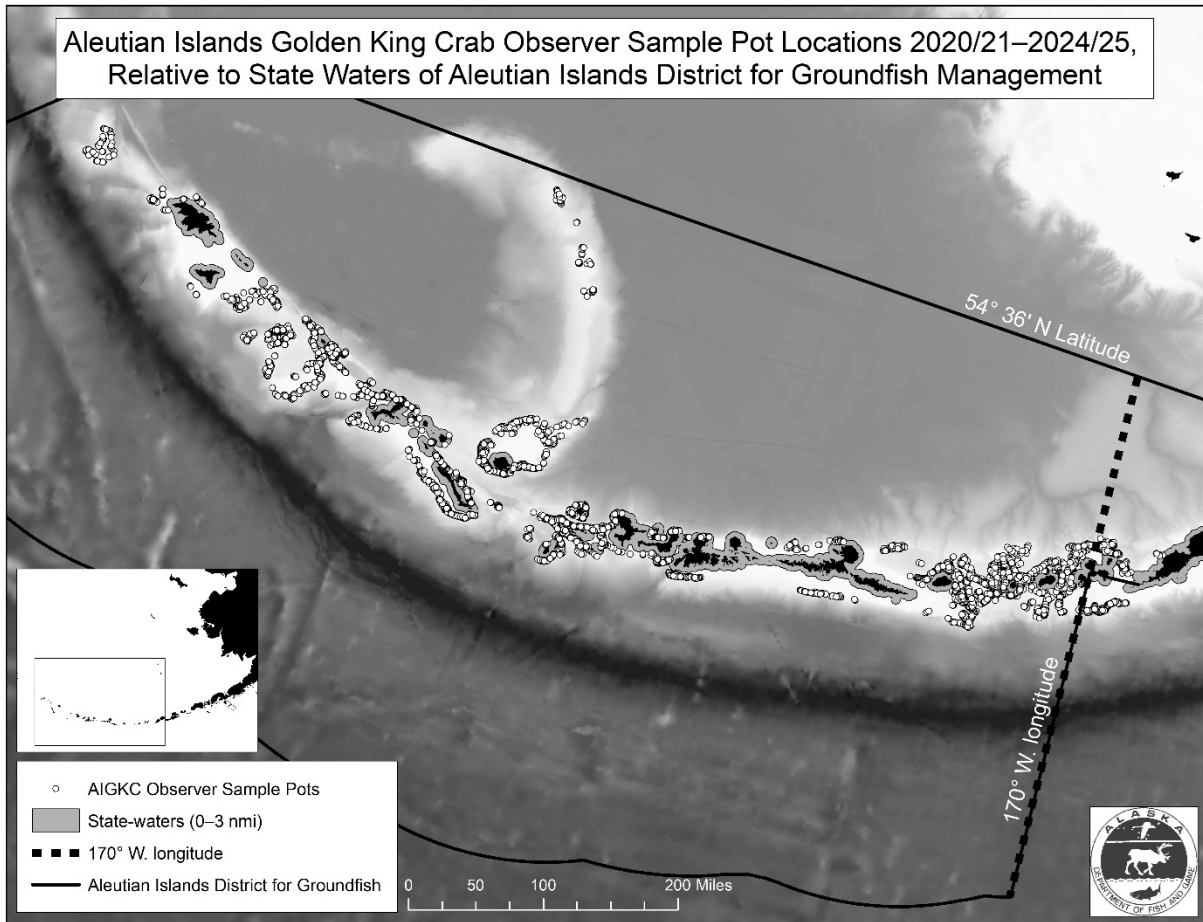


Figure 12.—Aleutian Islands golden king crab observer sample pot locations 2020/21–2024/25, relative to state-waters of Aleutian Islands District for groundfish management west of 170°W. longitude.

Table 30.—Aleutian Islands District reported harvest by ADF&G fish ticket of golden king crab by groundfish trawl gear in waters west of 170°W. long, 2020–2025.

Year	Vessels	Landings	State waters harvest		Federal waters harvest	
			Number of crab	% State waters	Number of crab	% Federal waters
2020	14	38	0	0.0%	4,936	100.0%
2021	11	37	396	5.8%	6,447	94.2%
2022	8	31	0	0.0%	3,350	100.0%
2023	11	37	0	0.0%	4,841	100.0%
2024	8	36	1	0.0%	3,581	100.0%
2025 ^a	9	17	0	0.0%	9,015	100.0%
Average	10	33	66	1.0%	5,362	99.0%

^a Harvest through August 15, 2025.

Table 31.—Aleutian Islands golden king crab fishery harvest and value in waters west of 170°W. long, 2020/21–2024/25.

Season	Vessels	Landings	State-waters harvest		Federal-waters harvest		Exvessel ^a	Fishery value ^b
			Pounds	% State waters	Pounds	% Federal waters		
2020/21	5	85	869,549	13.5%	5,566,289	86.5%	\$4.53	\$28,708,105
2021/22	5	88	785,704	13.5%	5,018,094	86.5%	\$5.14	\$29,411,056
2022/23	5	76	660,991	13.1%	4,389,285	86.9%	\$6.02	\$30,025,042
2023/24	5	93	717,674	13.0%	4,805,439	87.0%	\$5.03	\$27,385,204
2024/25	4	70	445,529	9.1%	4,439,044	90.9%	\$6.03	\$28,967,909
Average	5	82	695,889	12.6%	4,843,630	87.4%	\$5.35	\$28,899,463

^a Average initial price per pound of sold weight.

^b Fishery value based on sold weight and average initial price per pound.