

**Adak Community Development Corporation – Comments to BOF Re: Aleutian Cod**

*PROPOSAL 1 - Repeal and replace the Aleutian Island Sub-district Pacific Cod Management Plan with management measures found in the Dutch Harbor Sub-district Pacific Cod Management Plan.*

**Oppose** – The AI cod plan has been developed based on the specifics of our region and its communities. It has developed incrementally to balance the interests of a variety of stakeholders. We don't support disenfranchising small trawl vessels from the AI GHL fishery in which they've participated for over a decade.

*PROPOSAL 2 - Eliminate the 15-million-pound cap in the Aleutian Islands Sub-district Pacific Cod Management Plan.*

**Oppose** – We are concerned about the potential of killing the golden goose by over harvesting in our local area. The ABC from which the GHL is set is based on the whole Aleutian area, and our GHL is a minimum of 27% of the ABC, will go up to 31% next year. The vast majority of the GHL harvest occurs in the Adak Section which is a small portion of the AI. The NPRB has funded a project to place satellite tags on cod around Adak and Atka in cooperation with stakeholders in the AI cod fisheries. One of the objectives of the study is to determine how much and how far these cod move throughout the year. This may give us more insight into the potential for localized over harvest.

We don't think it is wise at this time to remove the 15M lb cap.

*PROPOSAL 3 - Amend the Aleutian Islands Sub-district Pacific Cod Management Plan to reduce the guideline harvest level based on processor availability.*

**Neutral** – We don't object to the proposal. We would prefer that the "bounce back" provision for a subsequent year be to the level that was in effect prior to the year that the reduction was in effect.

*PROPOSAL 4 - Decrease Aleutian Islands Sub-district state-waters Pacific cod fishery guideline harvest level if the guideline harvest level is not fully harvested the previous year.*

**Neutral** – We don't object to the concept behind the proposal. We note the concerns raised by NMFS about the timeliness of integrating a determination whether the GHL would be reached by Dec. 31<sup>st</sup> with the NMFS TAC setting process. This might require setting an earlier date and a threshold less than 100%.

*PROPOSAL 5 – Increase the 2020 Aleutian Islands Sub-district state-waters guideline harvest level if 2019 Pacific cod harvest by trawl catcher vessel participants in the federal Unrestricted Fishery diminishes access to the full Aleutian Islands Catcher Vessel Harvest Set-Aside.*

**Reconsidering** – We submitted this proposal by the April deadline, shortly after the closure of the federal CV trawl fishery. Adak had a successful cod season, but only due to the voluntary stand down of other sectors of the federal cod fishery in response to the Council’s request that they comply with the intent of AM113 after an accounting loophole was recognized. At the April NPFMC meeting we learned that while the Council was committed to fixing the “glitch”, that it would not be possible to have new regulations implemented for the 2019 season. We submitted Proposal 5 in an attempt to come up with a band-aid and to provide a signal to other sectors that the BOF also supported a continuing stand down until revised federal regulations can be implemented.

Subsequently, the Council took action in June to not entangle action on fixing AM113 with Bering Sea cod trawl issues, which could have delayed fixing the glitch for 2 or more years. In October the Council identified a preferred alternative which will fix the glitch and affirmed that it is the Council’s hope that other sectors will continue to stand down in 2019.

Both ADF&G and NMFS comments on Proposal 5 identify points of concern. At this time it is more important that the BOF echo the hope that other sectors stand down in 2019, than to take any action on Proposal 5.

*PROPOSAL 6 - Limit fishing for Pacific cod in the Adak section of the Aleutian Islands Sub-district to vessels 60 feet or less overall length and establish a guideline harvest level rollover provision.*

**Support** – The Adak Section was created to provide priority access for smaller vessel to fishing grounds close to the community of Adak during the parallel fishery. Currently pot vessels <125’ and trawl vessels <100’ can participate in the GHL fishery in the Adak Section (175 to 178), but during the parallel fishery there is a 60’ limit for all gear types. It makes sense to apply the same rationale to the Adak Section during both the parallel and GHL fisheries. This proposal would make it consistent 60’ limit for any gear type between both fisheries in the Adak Section.

*PROPOSAL 7 - Increase vessel size limit to 100 feet overall length for trawl gear vessels during parallel and state-waters Pacific cod seasons in the Adak Section of the Aleutian Islands Sub-district.*

**Oppose** – The Adak Section was created to provide priority access for smaller vessel to fishing grounds close to the community of Adak. This proposal goes backwards. We also note NFMS’s comments that this could start a new Section 7 Consultation under the ESA. That is something that we definitely don’t want to initiate.

*PROPOSAL 8 - Establish a pot limit for the Aleutian Island Sub-district state-waters Pacific cod fishery.*

**Neutral** – A 60 pot limit seems reasonable, but choosing the right number is something that we leave to the pot fleet to work out.