

ACDC Comment 12/12/19

RC

The federal CV trawl A season is likely to close the 1st week of February. With no A113 "set aside" in place, the Federal closure by the BS CV trawl fleet triggers the removal of the "box" and the 60 foot limit which applies only to the "box".

All state waters west of long 170°W, including the Adak Section, open to the state-waters fishery for pot vessels 125 ft or less OAL, trawl vessels 100 ft or less OAL, and longline and jig vessels 58 ft or less OAL, either 4 days after the Bering Sea and Aleutian Islands parallel "A" season for the catcher-vessel trawl fishery is closed, 4 days after the federal Aleutian Islands Subarea non-Community Development Quota season is closed, or March 15; whichever occurs first.

With the "box" going away early, the real emergency is extending the opening date for larger vessels to the "later of April 10th" or 4 days after the after the Bering Sea and Aleutian Islands parallel "B" season for the catcher-vessel trawl fishery is closed,

This will open the flood gates to large vessels (pot and trawl) that don't qualify for GHJ cod fisheries in any other areas.

There is a simple fix by modifying the regulations to trigger the opening of all statewaters to the closure of the federal CV trawl B season:

(c) The commissioner shall open and close, by emergency order, a state-waters season in the Aleutian Islands Subdistrict as follows:

(1) the Adak Section shall open January 1;

(2) all waters of the Aleutian Islands Subdistrict shall open as follows:

(A) four days after the Bering Sea and Aleutian Islands parallel "~~A-B~~" season for the catcher-vessel trawl fishery is closed ~~or four days after the federal Aleutian Islands Subarea non-CDQ season is closed, whichever is earlier;~~ or

(B) if the state-waters season has not opened under (A) of this paragraph by ~~March 14~~, **APRIL 10<sup>th</sup>** the commissioner will close, by emergency order, the parallel "~~A-B~~" season for the catcher-vessel trawl fishery at 12:00 ~~noon March 14~~ **APRIL 10<sup>th</sup>** and open, by emergency order, the state-waters season at 12:00 ~~noon March 15~~; **APRIL 14<sup>th</sup>**

This change would be consistent with the Commissioner's authority already embedded in the AI P. Cod Plan:

(e) The commissioner may open and close, by emergency order, fishing seasons at times other than those specified in this section if the commissioner determines it is necessary to

- (1) adapt to unanticipated openings and closures of federal seasons;
- (2) provide for maximum fishing opportunity;
- (3) maintain sustained yield management; or
- (4) provide for orderly fisheries.

The exclusivity provision could be set to be lifted on the same date:

(f) The Aleutian Islands Subdistrict is ~~a non~~ AN exclusive registration area for Pacific cod during a state-waters season PRIOR TO APRIL 10TH.

The pool of pot boats that could potentially enter the AI cod GHL fishery by early February:

size class	count						
58'	75	CFEI					
60' to 100'	84						
100' to 125'	75						

Notes on date in RC2:

Table 278-1 Aleutian Islands Subdistrict  
 2018 1M lbs/ boat, 10 trips/boat  
 2019 759,000 lbs/boat, 8.6 trips/boat

Table 278-4.-Dutch Harbor Subdistrict  
 900K lbs/boat, 12 trips/ boat

Table 278-2.- Aleutian Islands Subdistrict -  
 As many as 20 trawlers & 14 pot boats (50 boats total)