

Submitted by: Aleutian Pribilof Island Community Development Association, Bristol Bay Economic Development Corporation, Coastal Villages Region Fund and Yukon Delta Fisheries Development Association

Date: October 27, 2022

Substitute language for proposal #6:

5 AAC 28.648 Dutch Harbor Subdistrict Pacific Cod Management Plan.

Establish new framework for setting annual state-waters Pacific cod GHGs, as follows:

(1) the guideline harvest level for Pacific cod in the Dutch Harbor subdistrict is set annually based on the Pacific cod allowable biological catch for the federal Bering Sea Subarea as follows:

(A) beginning in 2023, the guideline harvest level is set at twelve percent (12%) of the Bering Sea Subarea Pacific cod allowable biological catch;

(B) every second year thereafter, the guideline harvest level will increase by one percent (1%) of the annual Bering Sea Subarea Pacific cod allowable biological catch up to a maximum level of thirteen percent (13% percent) of the Bering Sea Subarea Pacific cod allowable biological catch subject to the conditions as set forth below.

(2). If the guideline harvest level established under Section (1), above, is achieved during each of the two consecutive years, the guideline harvest level will be increased by one percent (1%) beginning the next year of the annual Bering Sea Subarea Pacific cod allowable biological catch but may not exceed thirteen percent (13%) of the annual Bering Sea Subarea Pacific cod allowable biological catch.

(3). If the guideline harvest level established under Section (1), above, is not achieved during each of the two consecutive years, the guideline harvest level will be reduced by one percent (1%) beginning the next year of the annual Bering Sea Subarea Pacific cod allowable biological catch but may not be reduced below ten percent (10%) of the annual Bering Sea Subarea Pacific cod allowable biological catch.

(4). A guideline harvest level is considered to have been achieved for any one year under Section (1), above, if, by November 15 of that year, ninety five percent (95%) of that guideline harvest level is projected to be harvested by the end of that calendar year.

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Rationale: Reduction of the current GHL stairstep cap from 15% to 13%

- Implementing a 13% cap is responsive to the numerous concerns expressed from Community Development Quota organizations and Alaskan stakeholders who have significant historical federal participation in the Pacific cod fishery and who have been negatively impacted by continued increases to the GHL fishery.
- The 2022 GHL is at 11% and scheduled to increase another 1% next year. A 13% cap represents a simple compromised approach, tempering the allocative impacts of the 2018 BOF action on Alaskan federal cod participants, while still allowing for additional increases to the GHL and opportunities for the U60 fleet. A 13% GHL represents a split between the current GHL percentage level (11%) and the status quo cap (15%).
- At current allowable biological catch levels, a 13% GHL represents an additional 18% increase to the GHL fishery. This GHL also represents an amount 28% bigger than the entire CDQ program allocation, which serves 65 communities and over 30,000 residents.
- It is appropriate to reconsider the status quo cap level (15%) due to the slower of pace of the fishery this year (266 days versus an average season length of 50 days in the past five years), in addition to some indication that the fleet has reached an equilibrium in vessel participation and effort.

Rationale: Performance Based GHL changes with a floor and cap

- In order to prevent cod from going unharvested in the GHL fishery, which could occur as a result of changes in abundance or effort, unfavorable market conditions or other unanticipated factors, a management mechanism is needed to adjust the GHL downward if certain performance thresholds are not met. The proposed language allows for a two-year trend in underutilization to trigger a 1%-point decrease to smooth out single year anomalous circumstances.
- Under the proposed language, additional increases to the GHL (up to the cap) are based on performance over a two-year period, which serves to provide additional stability to cod user groups and a better understanding of the near-term performance of the U60 fleet.
- An adjustment to the current harvest performance threshold from 90% to 95% could prevent significant amounts of cod from going unharvested, particularly during high abundance levels. If the GHL grows significantly due to higher levels of ABC, the fleet could achieve the 90% threshold, but theoretically leave up to the additional 10% in the water while still meeting the harvest threshold. Ten percent of a large GHL could represent a large number of pounds. At low/average levels of abundance, achieving a 95% threshold should not pose undue challenges for the fleet, as they have successfully done so every year since 2014.

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