

Submitted by: Frank Miles

PROPOSAL 52: Increase the percentage of Central Gulf of Alaska (CGOA) Pacific cod ABC taken by the Kodiak Area state-waters Pacific cod fishery from 12.5% to 17.5% and allocate that additional ABC to the pot gear fishery.

Dear Chairman Morisky and Board of fish members,

I wish to withdraw proposal 52 that I submitted for the following reasons:

- The status of GOA cod stock has changed from when I submitted this proposal. According to the GOA Cod stock assessment, spawning biomass in 2020 is at B17.6%, barely above the “over fished” threshold of B17.5%, and below the Steller sea lion threshold of B20%. Because it is below B20%, all Gulf federal cod fisheries are closed in 2020.
- If the spawning biomass goes just a little lower (i.e. below B17.5%) most likely there will be no state water cod GHL fisheries in any of the Gulf GHL areas (gulf-wide).
- The BOF should take no action to increase the Gulf cod GHLs until the stock has recovered to a healthier level (e.g. spawning biomass is over B20% and is projected to remain so for the foreseeable future).
- ADFG acknowledged the need to be conservative with state water Pacific cod harvests in the GOA with their decision to set state water harvest limits below the allowable levels in 2020. Supporting an increase in the Kodiak GHL is counter to the Department’s own action on harvest limits this year (35% reduction).
- Projections by the GOA Pacific cod assessment author that the stock will return above B20% as early as next year are based on assumptions about recruitment that the author agrees could very well prove to be overly optimistic especially with the new warm blob that started last summer in the GOA. No actions should be taken by BOF until adequate recruitment of cod occurs.

Best Regards,
Frank Miles
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