Request for a Board Generated Proposal for consideration at the January Kodiak meeting

The Problem

The AI GHL fishery opens January 1st in the Adak Section (175 to 178 – "the box") to vessels <60'. The GHL fishery in all AI state waters has begun either on March 15th or four days following the closure of the BSAI trawl fishery (which has generally occurred in the month of March).

In 2019 all AI statewaters opened March 15th. Upon the date of the all AI statewaters opening, the 60' size limit expires and is replaced by a <125' pot vessel limit and <100' trawl vessel limit in all AI statewaters.

It is projected that the BSAI A season closure will likely occur by sometime in the 1^{st} week of February. This will result in the loss of approximately one month of priority access for <60' cod vessels.

There are at least 20 CV trawl vessels >60' and <100' that have participated in the AI cod GHL fishery at some point in the past and many more that could. There are at least 100 pot vessels >60' and <125' that could participate.

As a result the <60' vessels will be forced to race against vessels up to twice their size, creating safety concerns. Early entry by >60' vessels will compress the season into a dangerous, wasteful derby which undermines the ability to maximize product value, while contributing to the destabilization of AI communities.

The solution(s)

Our preferred solution would be for the Board of Fish to recommend to the ADFG Commissioner to use the authority in 5 AAC 28.647.(e) to set a fixed start date in 5 AAC 28.647.(c) of no earlier than March 15th for the GHL cod fishery in all AI statewaters.

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

An alternate process for achieving our preferred solution in a timely manner for the 2020 A season, would be for the Board to generate a proposal, scheduled for action at the January meeting in Kodiak, to set a fixed start date in 5 AAC 28.647.(c) of no earlier than March 15th for the GHL cod fishery in all AI statewaters.