

C-11 Aleutian Island Community Protections in the P. Cod Fishery

We concur with the SSC recommendation that *“while the document for this Pacific cod allocation amendment is not ideal, its long-delayed development history suggests that soliciting public comment at this time could provide missing data and “refreshed” information on the crucial status of the harvesting and processing capacity in the AI on-shore sector.”*

We request that this initial draft be released for public review with minor modifications of the options concerning waiving the requirement to deliver to shoreplants in the Aleutians in the event that such plants aren't operating at sufficient capacity.

Option: If less than 1000 tons of the AI Pacific cod directed fishing allowance has been landed by February 28th the restriction on delivery to other processors shall be suspended for the remainder of the year.

Additionally, we recommend including an option that would suspend the AI shoreplant delivery requirement for the year based on a certification to NMFS by the cities of Adak and Atka prior to the January 20th trawl opening that the shoreplants in their jurisdictions will not be operating for cod that season.

We request that the Council clarify its intent to define shoreplants for purposes of this action in regulation as processing facilities located on land.

Thank you,

Adak Community Development Corporation

Aleutian Pribilof Island Community Development Association

City of Adak