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September 29, 2014

Mr. John Henderschedt, Acting Chairman
North Pacific Fishery Management Council
605 W. 4th Ave, Suite 306
Anchorage, AK 99501-2252

RE: Agenda Item C-11, AI Pacific Cod Directed Fishing Allowance

Dear Chairman Henderschedt,

Please accept the following comments from the Freezer Longline Coalition (FLC) in regards to agenda item C11, the AI Pacific Cod Directive Fishing Allowance. We appreciate the opportunity to provide our input on this important issue and welcome your feedback.

About FLC

The FLC represents the owners and operators of over 30 vessels that participate in the hook-and-line catcher processor (HAL CP) sector of the federal P-cod fishery in the Bering Sea and Aleutian Islands (BSAI). FLC member companies are the pioneers of the HAL CP sector in Alaska and have over 30 years of history fishing for P-cod in the North Pacific including the Aleutian Islands. The HAL CP fleet is a P-cod single species directed fishery fleet, and, therefore, is nearly fully reliant on P-cod.

The AI P-cod fishery is important for FLC members as a whole as well as for individual member vessels within the fleet. Members who historically harvest P-cod in the AI are skilled operators in these waters with decades of experience navigating and harvesting in the AI fishing grounds. This has enabled them to sustain fishing operations in the AI despite the higher operational costs relative to similar costs in the Bering Sea. Importantly, AI P-cod are typically larger in size than those found in the BS and return stronger prices on the international market, creating unique benefits for operators who can efficiently participate in the AI fishery. Re-deployment to the EBS cannot make up for the loss of the access to the large P-cod found in the Aleutians. It is important to keep these niche markets active with an ongoing supply of AI fish.

AI Pacific Cod Directed Fishing Allowance

The FLC requests the NPFMC re-consider the necessity of this proposed action in light of the fact that in 2014, the Aleutian Island p-cod statewater GHL is now **fifty-four percent (54%)** of the total Aleutian Islands p-cod ABC (see attached Figure 1).

The regulations for the AI statewater GHL p-cod fishery are designed to ensure shore-side delivery by catcher vessel and effectively preclude participation by CPs. In particular, longline CPs that have historically participated in the AI p-cod fishery are precluded from the AI statewater GHL fishery. With 54% of the AI ABC currently in the statewater AI GHL p-cod fishery and with the GHL designed for catcher vessels only, the need for this action at the NPFMC does not seem warranted.

The statewater GHL is currently calculated as 3% of the combined EBS and AI p-cod ABCs and for 2014 the GHL is 8103 mt (or 54% of the AI p-cod ABC). In 2014, the ITAC available to participants in the AI p-cod federal fishery is 6248 mt (or 41% of the AI p-cod ABC). [See attached Figure 2.]

As of 9/20/14, 88% (5484 mt) of the AI p-cod federal ITAC has been caught. The federal ITAC is expected to decrease to 5793 mt in 2015 (or 38% of the AI ABC). The GHL statewater fishery is expected to increase to 57% of the AI ABC in 2015. In the GHL statewater fishery, uncaught p-cod is stranded and does not roll back to the federal fishery. Table 6 of the analysis provides the annual amount allocated to the GHL but does not provide the total GHL catch or the amount of TAC that has been stranded by year for all years.

Effect of action on the longline CP sector:

Due to previous actions, the longline sector has experienced a declining harvest share in the Aleutians Islands p-cod fisheries (both by proportion and by amount). The cumulative effect of previous actions and this action will exacerbate this trend. The initial review draft identifies that the proposed action will have further increased negative impacts on the hook-and-line CP sector:

- *"Hook-and-line CP sector would likely be negatively impacted from the proposed action"*[1]

- *"The proposed delivery requirement of AI Pacific cod to AI shore plants will negatively impact offshore processing vessels that have historically participated in the AI Pacific cod fishery."*[2]

The analysis also recognizes the declining harvest and participation of the hook-and-line CP sector in the AI p-cod fishery. This decline is attributed to a cumulative effect of previous actions such as the BS and AI p-cod ABC/OFL split and the SSL management measures (from the 2010 BIOP)[3]. Prior to 2010, the non-trawl proportion of AI p-cod harvest was **33%** and trawl was 67% (1991-2010). For 2011-2013, the non-trawl proportion of AI p-cod harvest has decreased to **19%**. [See attached Figure 3].

These proportions are solely of the federal p-cod fishery in the Aleutians. The actual proportion of fixed gear p-cod harvest in the AI – and especially longline harvest - is further reduced in the Aleutians when taking into account the increasing proportion and amount of harvest in the state water GHL fishery. The majority of the Aleutian state water GHL p-cod fishery is trawl harvest.

[1] P. 9, C11 AI P-cod Allocation, Initial Review draft
[2] P. 10, Ibid.
[3] P. 55, Ibid.

The SSL management measures resulting from the 2014 BIOP (as contained in the proposed rule).are not expected to reverse this declining trend for the AI longline p-cod fishery. While the 2014 SSL BIOP management measures are an improvement over the 2010 BIOP (particularly in regards to re-opening Area 543), the lack of a seasonal AI p-cod apportionment or AI p-cod sector allocations (or a trawl/non-trawl split) will likely further reduce harvest opportunity for hook-and-line CP vessels.

The 2014 BIOP notes: *"Because the directed fishery for Pacific cod by trawl vessels typically starts earlier than the directed fishery for Pacific cod by non-trawl vessels, it is plausible that the Area 543 limit will be reached before the non-trawl vessels begin fishing. We anticipate that catches of Pacific cod with non-trawl gear in 543 will be very small to nil under the proposed action."*[4]

And the 2014 BIOP notes that the ITAC resulting from the BS and AI ABC/OFL split may cause the AI directed cod fisheries to close in the A season (with no B season harvest opportunity): "*The Aleutian Islands directed Pacific cod fishery is likely to close prior to the end of the A season under the new Aleutian Islands-specific TAC."*[5]

The stated intent of the management measures in the SSL proposed rule is "*spatially, temporally, and globally disperse fishing to mitigate potential competition for prey resources between Steller sea lions and these fisheries. Spatial and temporal fishery dispersion is accomplished through closure areas, harvest limits, seasonal apportionments of harvest limits, and limits on participation in a fishery."*[6]

Both the 2014 BIOP and proposed rule recognize that fixed gear in the Aleutian Islands is more spatially and temporally dispersed than trawl gear and fishes at a slower rate that is less likely to contribute to localized depletion. However, the cumulative effect of multiple management actions (including SSL management) in the Aleutians has severely restricted the gear types (non-trawl) that are the most consistent with intent of the SSL management measures.

Given the increasing proportion of the AI statewater GHL p-cod fishery and the cumulative effect of previous Council actions and the expected effect of the 2014 BIOP management measures, and the identified negative effects of this proposed action, the FLC requests that the NPFMC not proceed with this action. However, if the NPFMC proceeds with this action establishing an allocation for shoreside processing, that the analysis also include:

- An alternative establishing an AI p-cod allocation for the CP hook-and-line sector (or minimally, inclusion of a trawl/non-trawl apportionment).

- An option providing for a seasonal apportionment of p-cod in the federal fishery (as is currently included in the AI GHL fishery). This will ensure a more temporal dispersion of harvest and a B season. Non-trawl vessels have historically fished AI p-cod in the B season (as well as the A season) but after 2011, the B season was greatly reduced, and is likely to disappear completely with the new SSL measures and ABC split (see attached Figures 4 & 5).

[4] P. 207, 2014 BIOP
[5] Page 149, 2014 BIOP
[6] Page 37492 of the SSL proposed rule

- The analysis should also include an expanded discussion of the effects of the statewater GHL fishery on participants in the federal fishery including: the GHL proportion of the federal AI ABC; the total amount of p-cod harvest in 0-3 miles (parallel fishery plus GHL fishery); the amount of harvest left uncaught in the GHL fishery and stranded; the state regulations on participation in the GHL fishery (including the trip limits and onboard limits); and the biological implications of setting the AI GHL predominately based on a p-cod ABC in another unrelated management area (EBS).

- To provide a more complete representation of harvest trends by sectors, the analysis should include a historic catch by gear type or sectors from the combined AI federal fishery and GHL fishery – to the extent practicable. Due to confidentiality, the gear types may need to be further aggregated such as trawl and non-trawl.

- Include in the analysis the cumulative effects on the AI CP hook-and-line sector harvest opportunity from previous actions (AI and EBS p-cod split; 2011 SSL management measures; and the statewater GHL fishery) as well as from the proposed 2015 SSL management measures and the proposed action item.

The FLC makes this request due to the steadily declining harvest opportunity in the Aleutian Islands p-cod fishery for the CP hook-and-line fishery. The longline p-cod fishery in the Aleutian Islands is the most spatially and temporally dispersed p-cod fishery in the AI and the least likely to result in localized depletion.

The CP hook-and-line p-cod vessels have a long history of participation in the Aleutian Islands but the opportunity has steadily decreased due to the cumulative effect of previous actions. The harvest opportunity is expected to further decrease under the 2014 SSL proposed rule as well as the increasing size and proportion of the statewater GHL fishery. The action before the Council today will also have further negative effects on the CP hook-and-line sector as identified by the analysis. Please see the attached supporting materials for this request.

Thank you for your consideration in this matter,

Sincerely,

Chad I. See
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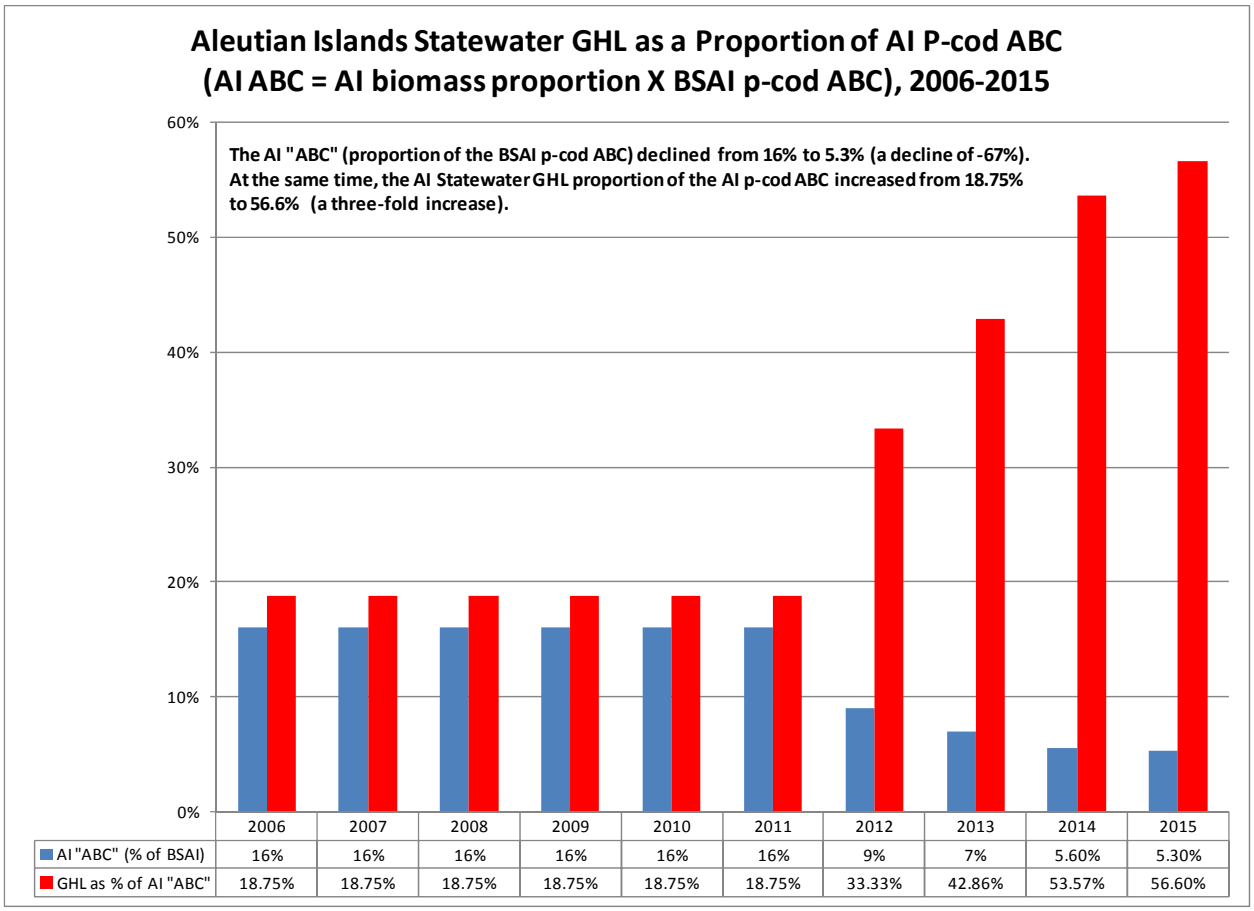
Figure 1: Aleutian Islands p-cod ABC and AI statewater GHL by proportion



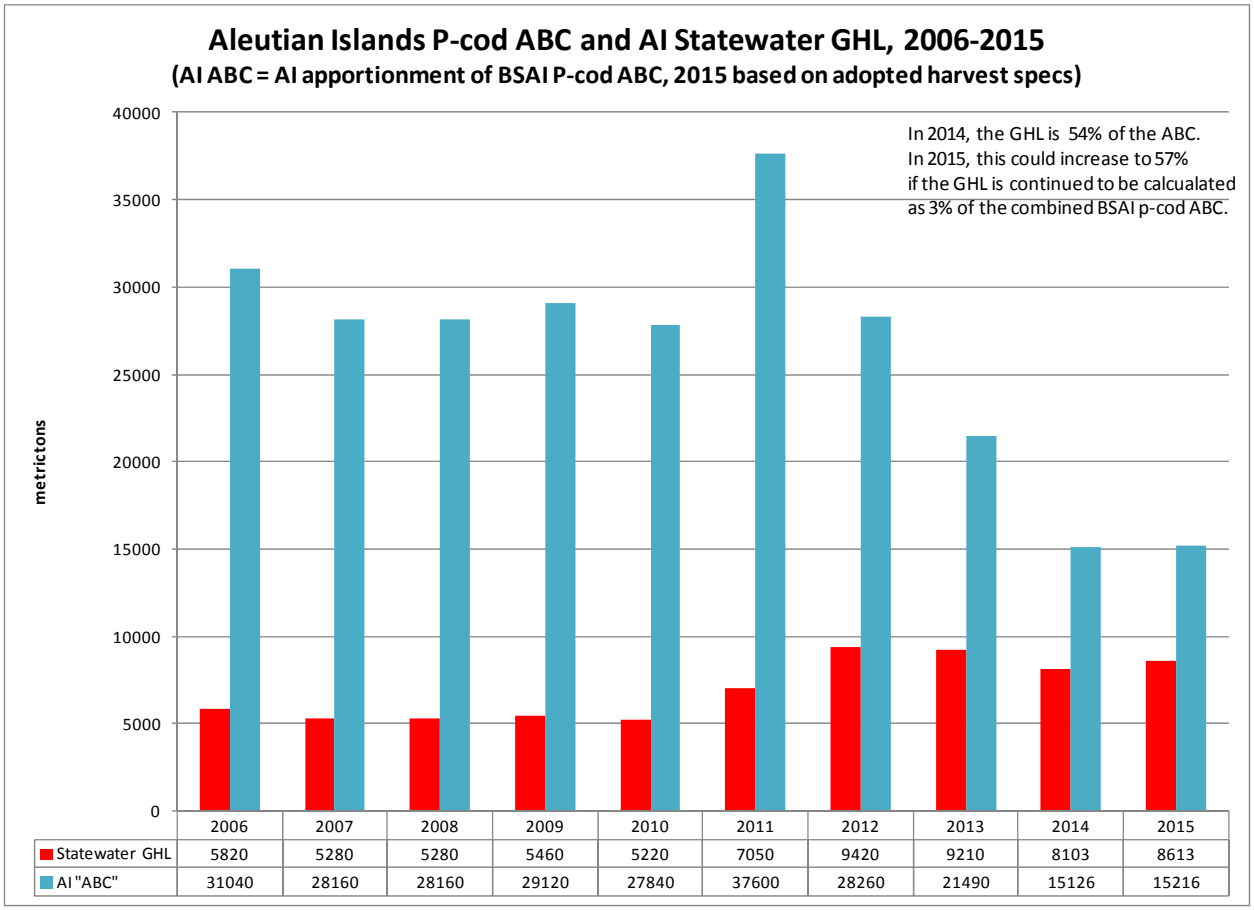
The Aleutian Islands proportion of BSAI biomass has declined **-65%** (2011-2014) going from 16% of BSAI to 5.6% of BSAI and is expected to slightly decline in 2015 to 5.3%.

At the same time (2011-2014), the AI statewater GHL proportion of the AI "ABC" has increased from **18.75% to 53.57%** - almost a three-fold increase and expected to increase to **56.6%** in 2015.

The regulations for participation in the AI statewater GHL fishery include: vessel size limits by gear type, daily trip limits, and a limit on the total amount of cod onboard the vessel. Under the GHL management plan, longline vessels must be less than 58' in the A season and less than 60' in the B season - effectively precluding participation by the CP hook-and-line fleet that has historically participated in the AI p-cod fishery.

Table 6 of the Initial Review draft shows the GHL amounts and harvests for 2006 and 2013 but the table does not show the total GHL harvested or total uncaught GHL by year for all years (except for 2006 where 3.5 million pounds where rolled back to the federal fishery). Since 2006, uncaught p-cod in the GHL statewater fishery have not been rolled back into the federal fishery but are stranded.

Figure 2: AI p-cod ABC and GHL in mt



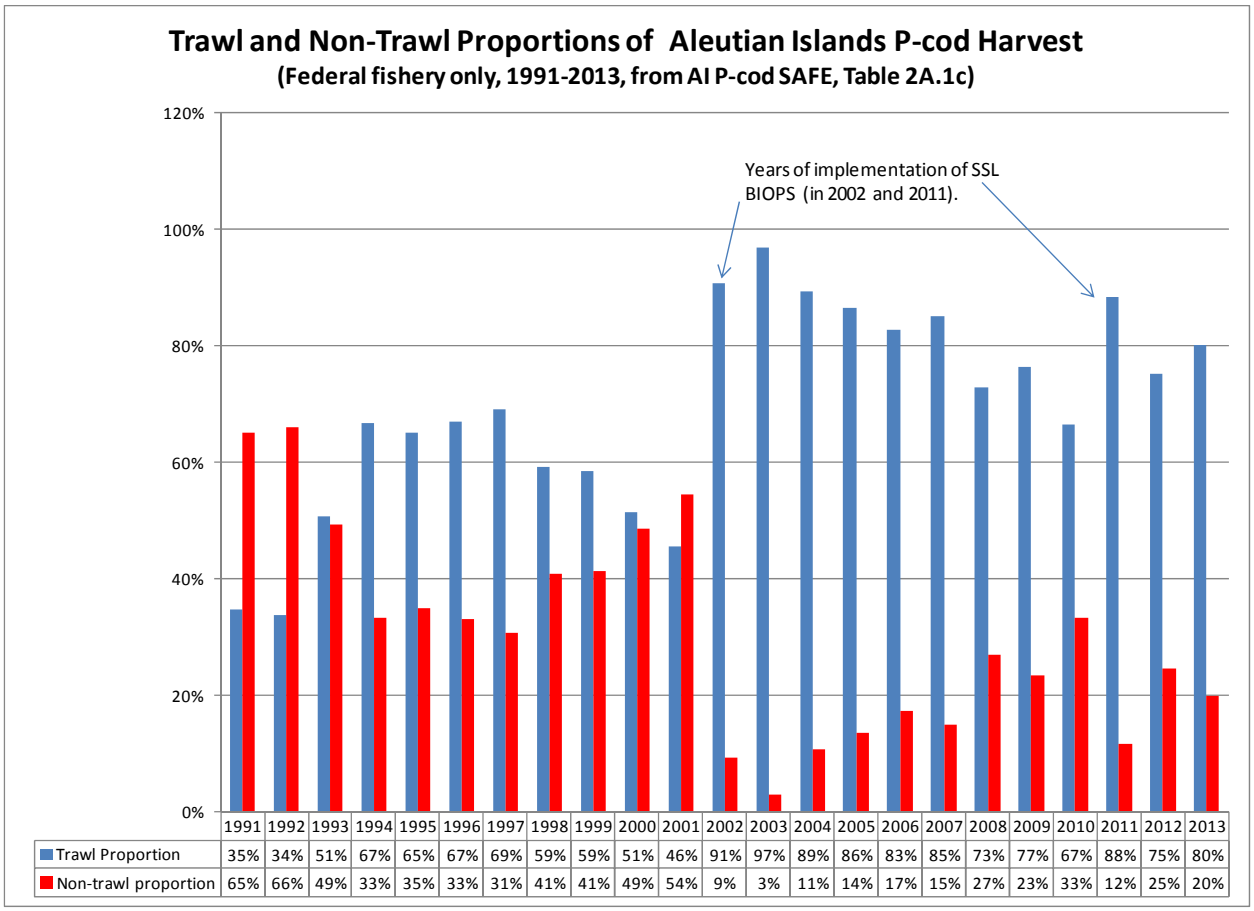
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Statewater GHL	5820	5280	5280	5460	5220	7050	9420	9210	8103	8613
AI "ABC"	31040	28160	28160	29120	27840	37600	28260	21490	15126	15216

While the statewater GHL proportion of the AI p-cod ABC has increased (as the AI ABC is decreasing) the actual GHL mt has also increased. The 2014 GHL is +39% larger than the 2006 GHL.

The calculation of the AI statewater GHL based on the combined EBS ABC and AI ABC (which is predominately composed of the EBS ABC) is a scientifically questionable management practice that has little relationship to the actual distribution of p-cod biomass.

The increasing statewater GHL is concentrating more catch inside of three miles in terms of both proportion and amount. The analysis should include the amount of harvest in 0-3 resulting from the GHL fishery, the parallel fishery, and the combination of both fisheries inside of 3 miles.

Figure 3: Declining non-trawl proportion of AI p-cod harvest



	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
Trawl Proportion	35%	34%	51%	67%	65%	67%	69%	59%	59%	51%	46%	91%	97%	89%	86%	83%	85%	73%	77%	67%	88%	75%	80%
Non-trawl proportion	65%	66%	49%	33%	35%	33%	31%	41%	41%	49%	54%	9%	3%	11%	14%	17%	15%	27%	23%	33%	12%	25%	20%

From 1991-2010, the non-trawl portion of AI p-cod harvest in the federal fishery was 33%. From 2011-2013, the non-trawl portion of AI p-cod harvest in the federal fishery was reduced to 19%. Large reductions in the proportion of non-trawl harvest in the Aleutian Islands federal fishery occurred in both 2002 and 2011 – coinciding when new SSL measures were implemented.

The above figure is the non-trawl proportion of harvest for the federal AI p-cod fishery. The actual proportion of fixed gear p-cod harvest in the AI – and especially longline harvest - is further reduced in the Aleutians when taking into account the increasing proportion of harvest in the state water GHL fishery. The majority of the Aleutian state water GHL p-cod fishery is trawl harvest.

Table 9 of the Initial Review draft includes the retained AI p-cod catch for CP hook-and-line (2003-2014). From 2003 to 2010, the retained catch was **2976 mt/yr**. From 2011-2013, the retained catch is **1731 mt/yr** (or -42%). This may be further reduced by the new SSL management measures as well as consequences of this proposed action.

Figures 4&5: Temporal Dispersion: Figure 6 of the Initial Review Draft (below) shows AI p-cod catch by week for 2010-2014 in mt. The catch is compressed in the early A season with little catch in the B season.

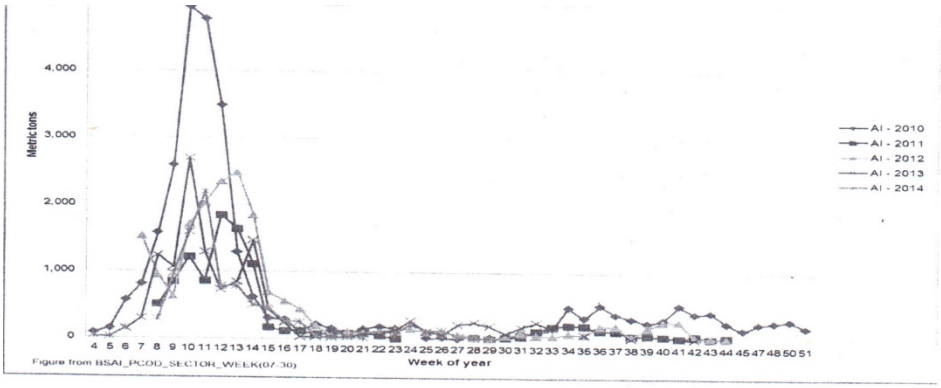


Figure 6 Total retained harvest of Aleutian Islands Pacific cod by week, 2010 through July 2014

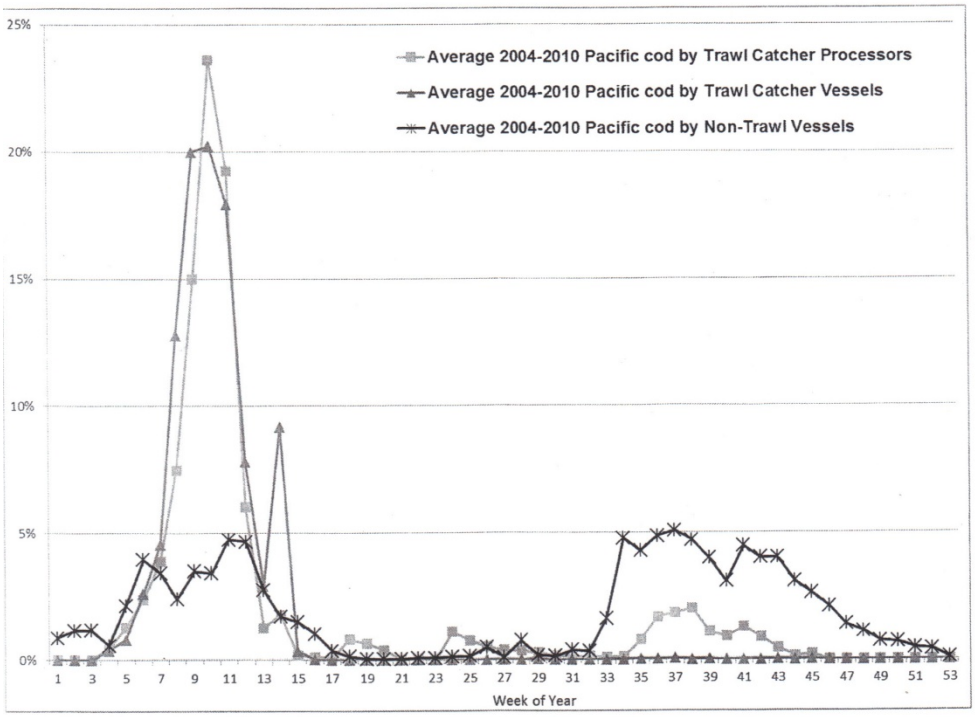


Figure 3-8 2004–2010 Average weekly percentage of Pacific cod catch by sectors

Figure 3.8 of the SSL EIS shows the proportion of catch by week by sector for 2004-2010. The non-trawl catch is more temporally dispersed throughout the year and there is significant catch in the B season (2004-2010). The B season non-trawl harvest that is evident in 2004-2010 is absent in the figure depicting 2010-2014. The non-trawl harvest is also more spatially dispersed in 2004-2010 (see Figure 17 of Initial Review draft) than in 2011-2012 (Figure 18 of Initial Review draft).

2014 BIOP and Proposed Rule: The stated intent of the management measures in the SSL proposed rule is "*spatially, temporally, and globally disperse fishing to mitigate potential competition for prey resources between Steller sea lions and these fisheries. Spatial and temporal fishery dispersion is accomplished through closure areas, harvest limits, seasonal apportionments of harvest limits, and limits on participation in a fishery."*[7]

In both the proposed rule and the 2014 BIOP, NMFS acknowledges that the fixed gear (hook-and-line and pot) is less likely to cause localized depletion due to the slower rate of fishing and increased temporal and spatial dispersion by fixed gear:

- Rate: Proposed Rule 37494: *"…Pacific cod hook-and-line and pot gear harvests occur in much smaller quantities and at slower rates for these gears than trawl gear. This makes it less likely that hook-and-line and pot gear harvests would result in localized depletion of Steller sea lion prey resources."*

- Temporal: 2014 BIOP, p. 229: "*The non-trawl fishery is dispersed temporally to a greater extent than the trawl fishery."*

- Temporal: 2014 BIOP, p. 149: "*Pacific cod catch by non-trawl gear is distributed throughout the year to a much greater extent than trawl gear."*

- Temporal: 2014 BIOP, p. 152: "*From the catch data we see that Pacific cod trawl fisheries are the most temporally compressed fisheries (mid-February to mid-March)."*

- Spatial: 2014 BIOP, p. 112: "*Compared to trawl vessels, the catch by non-trawl vessels is dispersed throughout the Aleutian Islands."*

In contrast to these statements, the proposed rule SSL management measures (due to the lack of a seasonal apportionment and/or sector allocations) will likely result in a temporally compressed harvest in the A season by trawl vessels – which the 2014 BIOP also acknowledges.

2014 BIOP, p. 207: *"Because the directed fishery for Pacific cod by trawl vessels typically starts earlier than the directed fishery for Pacific cod by non-trawl vessels, it is plausible that the Area 543 limit will be reached before the non-trawl vessels begin fishing. We anticipate that catches of Pacific cod with non-trawl gear in 543 will be very small to nil under the proposed action."*

The 2014 BIOP notes that the ITAC resulting from the AI and BS p-cod ABC split may cause the AI directed cod federal fisheries to close in the A season (with no B season harvest opportunity): "*The Aleutian Islands directed Pacific cod fishery is likely to close prior to the end of the A season under the new Aleutian Islands-specific TAC."*[8]

[7] Page 37492, Propose Rule
[8] Page 149, 2014 BIOP

Adak Community Development Corporation

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September 29th, 2014

John Henderschedt, Chairman NPFMC
605 W. 4th Avenue. Suite 306
Anchorage, Alaska 99501-2252

Re: C-11 AI Pacific Cod Directed Fishing Allowance and Delivery Requirement

Dear Chairman Henderschedt,

Adak Community Development Corporation believes the Initial Review draft analysis of the "Aleutian Island Pacific Cod Directed Fishing Allowance and Delivery Requirement" contains the information necessary to inform a decision on the alternatives. We request the Council take the next step and schedule final action.

The problem was brought to the attention of the Council in 2008. As the history of the action (page 16 & 17) shows, the issue has gone through 4 discussion papers and 3 versions of Initial Review drafts over the last 6 years. The problem statement developed for the December 2009 Initial Review Draft has remained relatively unchanged, and it is clear that this is not a problem that will go away by doing nothing.

The Range of Alternatives

The multiple discussion papers and draft analyses have served to scope the range of reasonable alternatives. As the analysis points out (pages 18 & 70) the approach in the proposed action alternative has several advantages compared to options the Council has considered in the past.

- *First and foremost, the proposed action would maintain the sector allocations implemented under Amendment 85 and each sector would have access to their entire cod allocation. This action would modify who can harvest AI Pacific cod early in the fishing year.*
- *The proposed action would remove the AI trawl CV fishery from a race with the BS trawl CV fishery, and addresses the increasing shift of effort early in the year primarily by pollock CVs.*
- *The proposed action would limit increased participation by surplus processing capacity from rationalized sectors, by creating a date before which offshore processing sectors cannot participate.*
- *The proposed action also provides an option that is intended to prevent stranded TAC. For example, in fishing years where half of the directed fishing allowance has not been delivered by a date certain, the processing restrictions are removed.*

In February the Council requested industry sectors work together on developing additional alternatives to be brought back to the Council for consideration, with the direction that such alternatives achieve the following goals in the AI Pacific cod fisheries:

- *Maintain functional Aleutian Islands shore plants west of 170 degrees*
- *Maintain trawl and fixed gear sector access to AI Pacific cod fisheries*
- *Minimize pre-emption of the AI CV cod fishery by the BS CV cod fishery"*

To date, neither ACDC nor the city of Adak has been approached to participate in identifying an alternative that would better address the problem statement and meet the goals identified by the Council.

We believe that short of a rationalized CV cod fishery with regionalization, there are no other reasonable alternatives to analyze beyond what is in the Initial Review draft.

Comments on the Analysis

ACDC believes the Initial Review draft contains the necessary data for reaching decision and is substantively complete. As the document notes (page 45,) "*Assessing the effects of the alternatives and options involves some degree of speculation."*

ACDC wishes to offer the following comments on some of the speculation concerning potential impacts.

Stranded Cod

The analysis includes a discussion of the potential for "stranding" cod in the AI (pages 62 & 63.) It states, "*both March 7 and 15 would likely result in some stranding of AI Pacific cod"* and that the AI cod fishery peaks during the 1st two weeks of March and then "*the fishery is quickly diminishing over the next few weeks."*

While it is true that there is *"rapid decline in fishing and processing active over the next two weeks" (page 62)* during the years used in Figure 8 (2009-2014), the decline is not due to a decline in CPUE. It is due to the closure of the fishery. Table 26 provides the closure dates going back to 2003 and shows that the 2003 is the only year during which the fishery was open in the last week of March. Table 27 provides weekly catch rates but only goes back to 2010. The 2003 NMFS report on catch by week (https://alaskafisheries.noaa.gov/2003/halibut_psc.xls) shows 11,700 tons of trawl cod harvest in the AI during the last two weeks of March, of which over 3,000 tons each week was harvested by shorebased CV's.

Even if CPUEs were lower for trawl CVs during the last half of March (which we don't believe to be the case), cod not harvested by trawl CVs would be available to all other sectors for the remainder of the year. Given that the CP H&L and AM-80 sectors seem to want more AI cod, it is unlikely that any cod would ever be "stranded". For the CV trawl sector, any cod they don't harvest in the AI, is available to them in the Bering, so there is no "stranding" issue for the CV trawl sector.

Capacity

Table 27 is a useful comparison of AI and BS CV cod catch by week versus the AI ITAC. Comparison against the effective directed fishing allowance (DFA) would be more appropriate since that is what closes directed fishing.

Another important bit of information is shown in table 27 though not directly discussed in the text. 2010 was a year that the shoreplant in Adak was essentially not operating and all but 298 tons (table 24) was taken by CVs delivering AI Pacific cod to CPs and floaters. The data in the table show that these at-sea processors took 4474 tons the 1st week of March and 4180 tons the 2nd week.

Adding in the potential catch of trawl and fixed gear CPs, the data in the analysis makes it clear that under status quo, the entire AI cod DFA could be taken in a week.

Redistribution

The analysis states (page 65) "*In those occasions that the BS Pacific cod fishery is closed to directed fishing to prevent preemption of the AI Pacific cod fishery, the effect of this limitation would be a redistribution of Pacific cod from trawl CVs operating in the BS to trawl CVs operation in the AI.*"

The accuracy of this statement is dependent on the baseline used. Relative to what can happen under status quo, preventing preemption does "redistribute" from CVs fishing the BS to CVs fishing the AI. However, as the analysis shows (page 59 & table 16) that over the last decade Adak deliveries "*often ranged from 6,000 to over 9,000 mt*".

Relative to that historic baseline, reserving up to 5,000 tons of the AI cod DFA for AI shorebased delivery, only limits the amount of "redistribution" from CVs fishing the AI to CVs fishing the BS.

Displacement/Redeployment

The analysis states (page 58) "*Vessels displaced from the AI Pacific cod fishery have limited opportunities for redeployment into other BSAI or GOA groundfish fisheries.*" While there may not be opportunities in other non-cod targets, there is no need to shift targets for vessels "displaced" from AI cod. As the analysis points out elsewhere each sector has a sector allocation of cod at the aggregate BSAI level. Any cod harvest foregone by a sector in the AI is available to that sector in the BS.

PSC

The analysis notes (page 9) that trawl halibut bycatch rates in the AI are 1/10th the rates in the Bering Sea. It states "*the trawl halibut PSC limits could potentially prevent trawl CVs and CPs that historically participated in the AI Pacific cod fishery from catching their sector allocation in the BS.*" It should be noted that to the extent the action alternative results in more AI CV catch, it benefits the BS CV fleet in halibut savings, offsetting the PSC impact on trawl CPs that substitute BS cod for AI cod.

H&L halibut rates are not mentioned in the analysis, but previous Council documents have shown higher bycatch rates in the AI for H&L CP than in the Bering. Thus, to the extent the action alternative constrains the amount of the H&L harvest being taken in the AI, it represents a halibut savings.

Relative Impacts

The analysis states (page 58) "*Vessels shifting their Pacific cod harvests from the AI to the BS may receive a lower price for Pacific cod in the BS…*" This is true, but it needs to be viewed in the context of the data provided in tables 8 and 10. These data show that the weighted averages of AI cod revenue for the period 2003 to 2013, by trawl and fixed gear CPs that retained AI cod, were 4.8% and 3.6% respectively.

Thus because cod catch foregone in the AI is available to the each sector in the BS, even if the average premium for AI cod is 25 to 30 percent, the net dollar loss is around 1%. Further, because the AI cod TACs are much lower than they were in the previous decade, most of this "loss" is a function of TAC rather than of the action alternative.

In contrast, communities in the AI experience 100% loss of revenue for every foregone pound of AI cod, as they have no means of substituting Bering Sea cod.

Competition and Innovation

The analysis includes a discussion on the impact of the alternative on ex-vessel price to AI harvesters (page 60). While it is generally the case that more buyers mean more competition and higher prices to harvesters, there are some offsetting factors that should be considered. Many of the non-shorebased processors that have participated in the AI cod fishery have company owned fleets. Because these processors have the ability to direct their vessels to fish at whatever price they set, it restricts the ability of independent vessels to negotiate price in a derby fishery such as AI cod. In contrast, processors operating in Adak have always had a high degree of dependence on deliveries from boats over which they have no control and no alternative source of supply, while the boats delivering to them generally have alternative markets.

This year, 2/3rds of the harvest of the AI cod DFA took place in a two week period, during which the Adak shoreplant was racing against a CP acting as a mothership. The Adak processor was an innovator who was trying to produce individual vacuum pack filet portions. The fact that he was racing against a mothership operation contributed to his decision not to operate the plant in the future. In this case excess capacity acted as a barrier to innovation.

At-sea Processing Baseline

Table 21 presents a comparison of at-sea processing with shorebased processing. It appears that in this table "at-sea processing" includes the directed catch of CPs. While it is possible by comparing other tables in the analysis to impute the amount of CV catch processed by at-sea processors, it would be helpful to have a discreet column of those data.

Such a presentation would demonstrate more clearly the shift of excess processing capacity from the rationalized sectors into the mothership mode in the AI cod fishery.

The document notes (page 61) that "those offshore processing vessels that have historically participated in the AI Pacific cod fishery will likely experience a reciprocal decline in

economic activity from the loss of AI Pacific cod harvesting and processing." This statement overlooks the option these vessels have to buy from CVs in the Bering Sea.

Sideboards

The analysis summarizes sideboards applying to the AFA, AM 80 and Crab Rationalization program. It also notes (page 31) that the FLLC coop is effectively a rationalized fishery that allows H&L CPs to change the way they operate. Under status quo this could allow them to increase their A season AI participation. It should be noted that this is the only rationalized sector not subject to sideboards in the BSAI.

Definition of Shoreplant

The document suggests that the Council explicitly define a shoreplant (page 58.) Our preference is that a shoreplant be defined as a processing facility located on land.

Conclusion

The task at this meeting is not to choose an alternative, but to evaluate the adequacy of the analysis and the range of reasonable alternatives. The six year scoping process has produced one action alternative (with sub-options) that addresses the problem statement. The Initial Review draft is substantively complete and contains the relevant data.

It's time to "fish or cut bait" and move the document forward for final action.

Thank you for considering our comments.

Sincerely,

dave fraser
ACDC