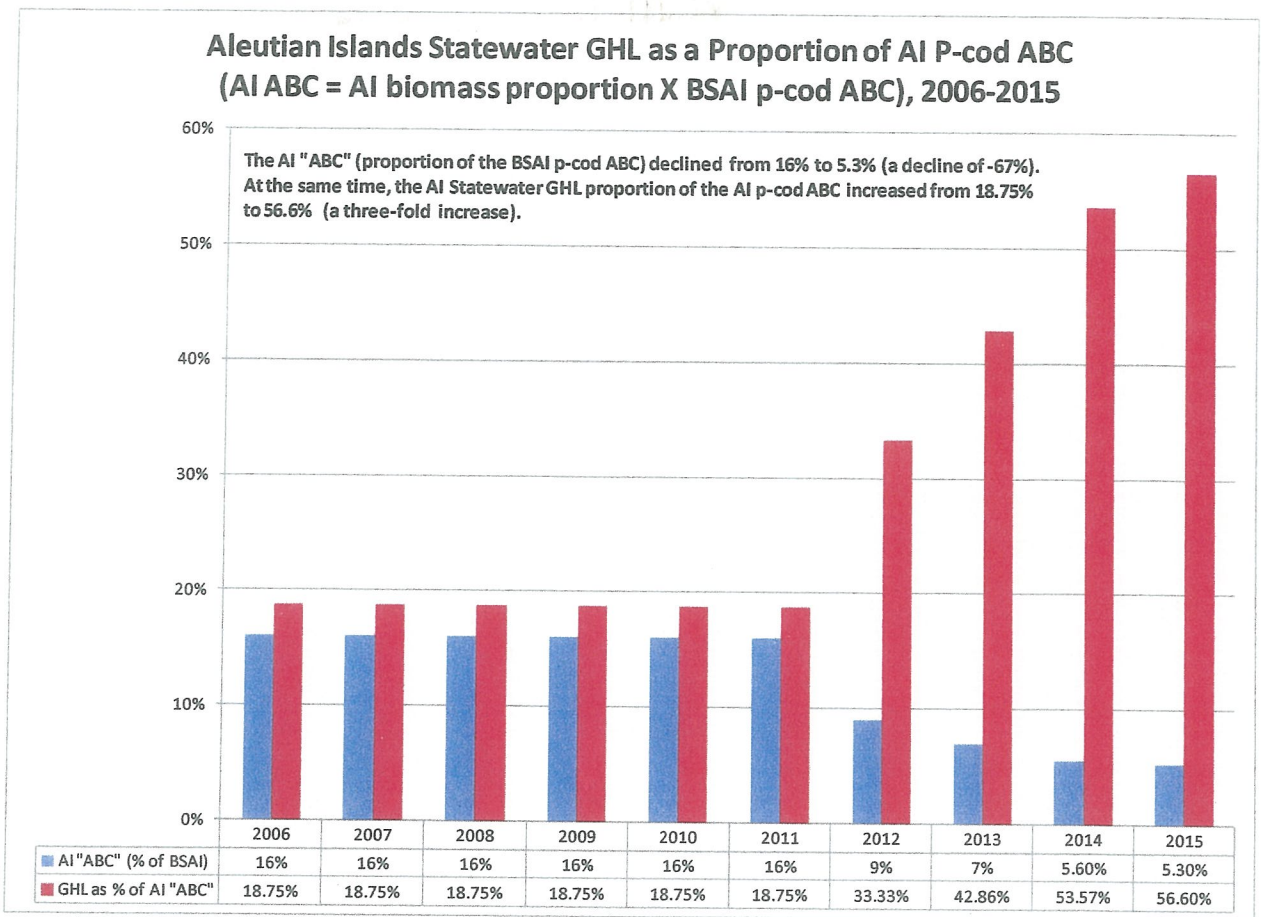


**Figure 1: Aleutian Islands p-cod ABC and AI statewater GHL by proportion**



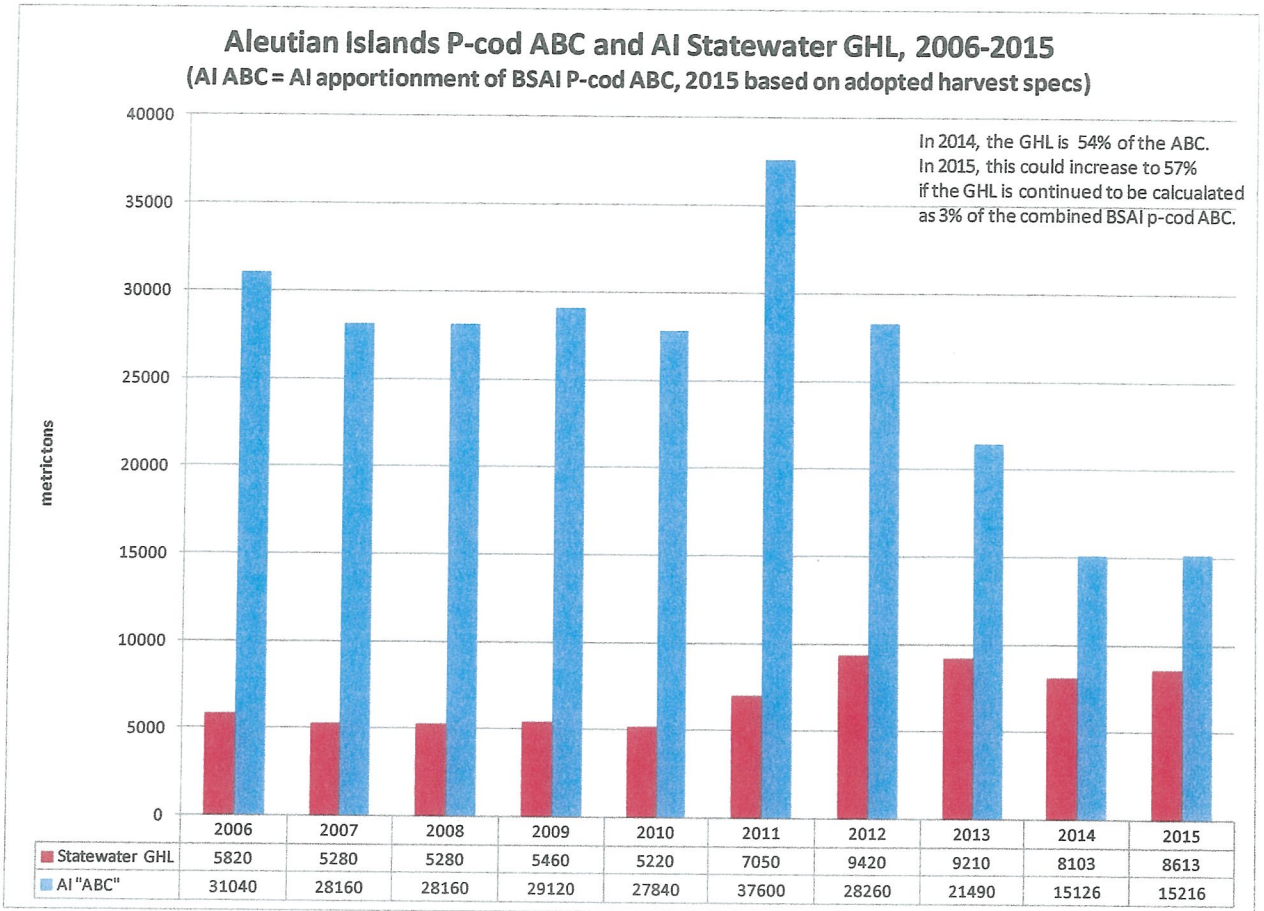
The Aleutian Islands proportion of BSAI biomass has declined -65% (2011-2014) going from 16% of BSAI to 5.6% of BSAI and is expected to slightly decline in 2015 to 5.3%.

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 were 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



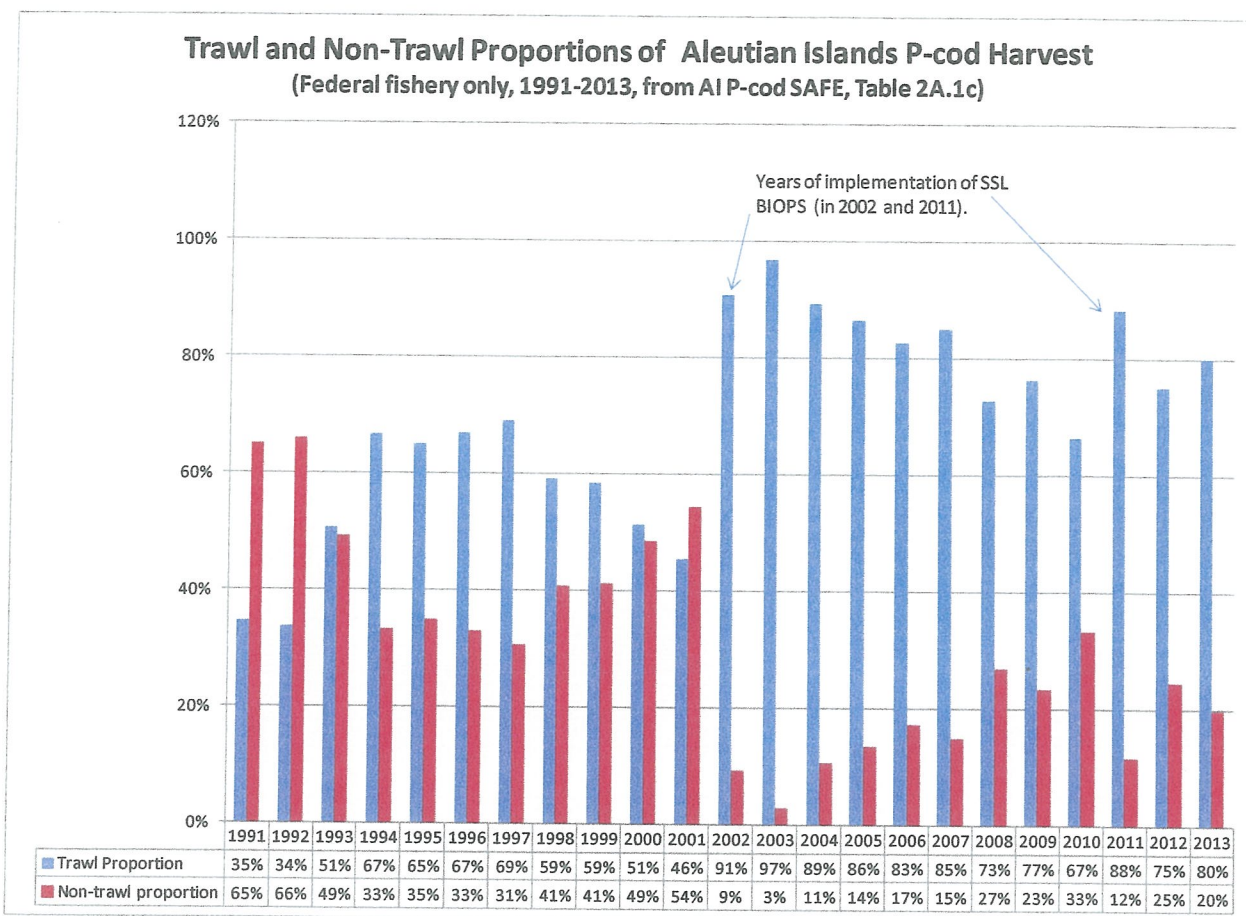
While the statewater GHL proportion of the AI p-cod ABC has increased (as the AI ABC is decreasing) the actual GHL mt has also increased. The 2014 GHL is +39% larger than the 2006 GHL.

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**



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.

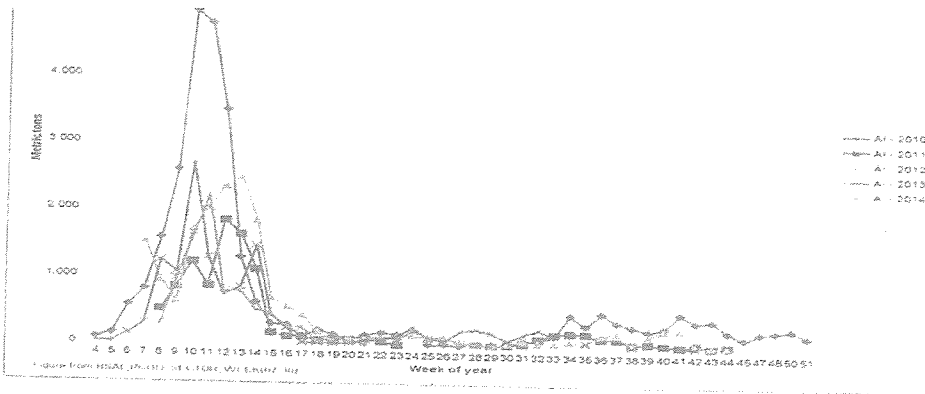


Figure 6 Total retained harvest of Aleutian Islands Pacific cod by week, 2010 through July 2014

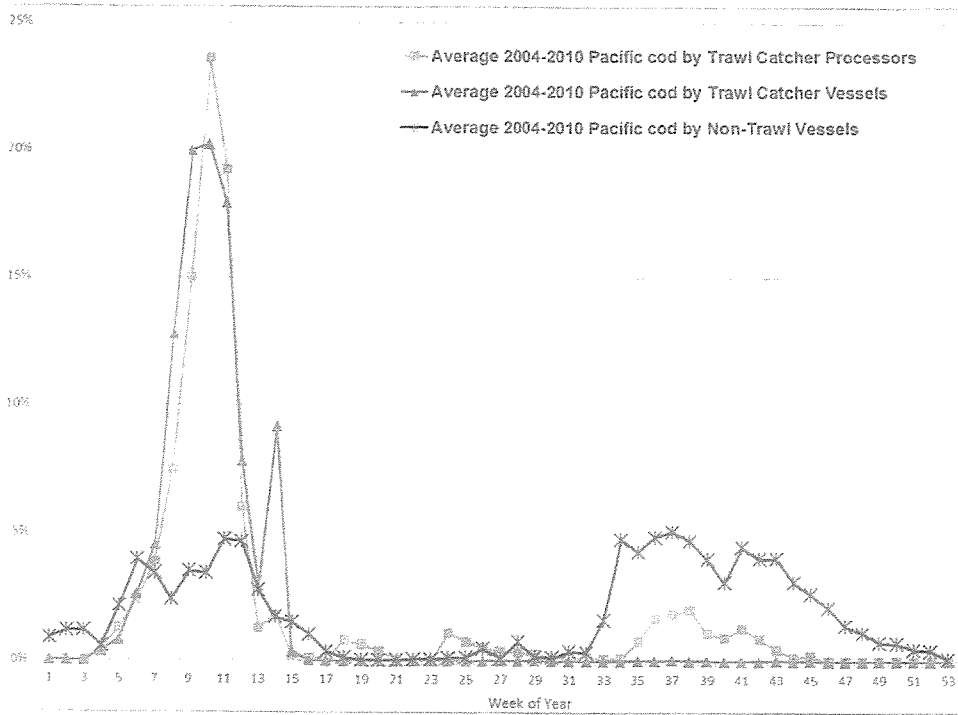


Figure 3-8 2004–2010 Average weekly percentage of Pacific cod catch by sectors

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). Directed fishing for p-cod in the Aleutian Islands closed March 16, 2014.