



October 8, 2014

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

RE: B reports: BSAI Greenland turbot negotiation update

Mr. Chairman and Members of the NPFMC,

The Freezer Longline Coalition (FLC) would like to update the Council on the status of industry negotiations regarding BSAI Greenland turbot sector allocations. Negotiations have not resulted in a long term catch share arrangement. The result of the negotiations between the A. 80 sector and the FLC has only resulted in an agreement by the A. 80 sector to avoid AI turbot if possible. The A. 80 sector harvests turbot incidentally while the longline sector harvests turbot in directed fishing (which normally starts May 1).

The current status of turbot management (2013 and 2014) is that there is no directed fishing for turbot in the Aleutian Islands and there is a reduced directed fishery in the EBS which now opens on September 1 (when there is an increased amount of killer whale predation).

The FLC is hopeful negotiations will be successful as the turbot ABC is expected to increase in 2015. However, given the reduced opportunity for the directed hook-and-line fishery, the increased amount and proportion of catch by the A. 80 sector (post-2008), the FLC wanted to inform the Council on the current state of negotiations. If a mutually agreed to arrangement is not arrived at, the FLC may have to request the NPFMC update and move the BSAI turbot allocation analysis forward in an expedited manner.

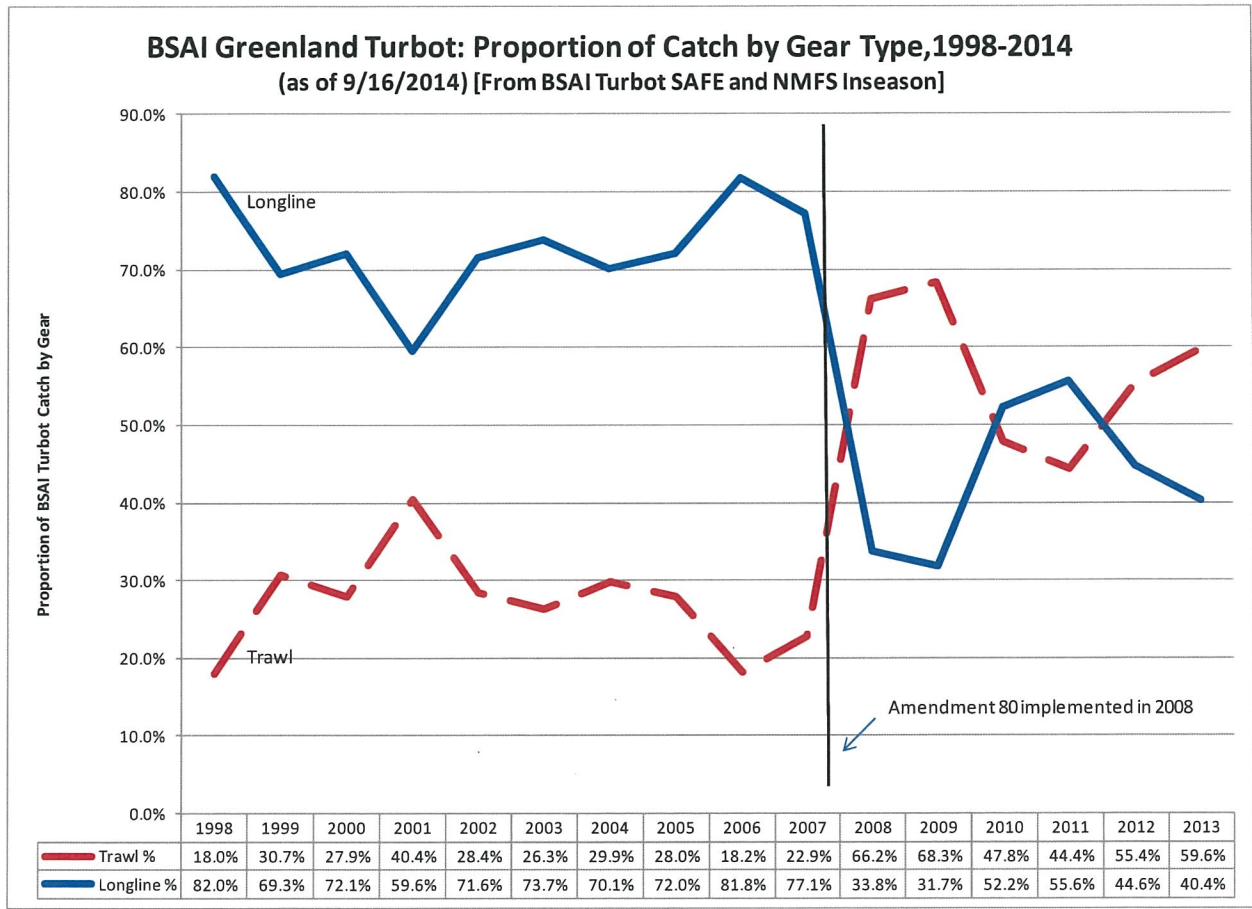
Thank you for your consideration in this matter,

Sincerely,

A handwritten signature in blue ink, appearing to read "C. See", is written above the typed name.

Chad I. See
Executive Director
Freezer Longline Coalition

BSAI Greenland Turbot Update: Freezer Longline Coalition, October 8, 2014



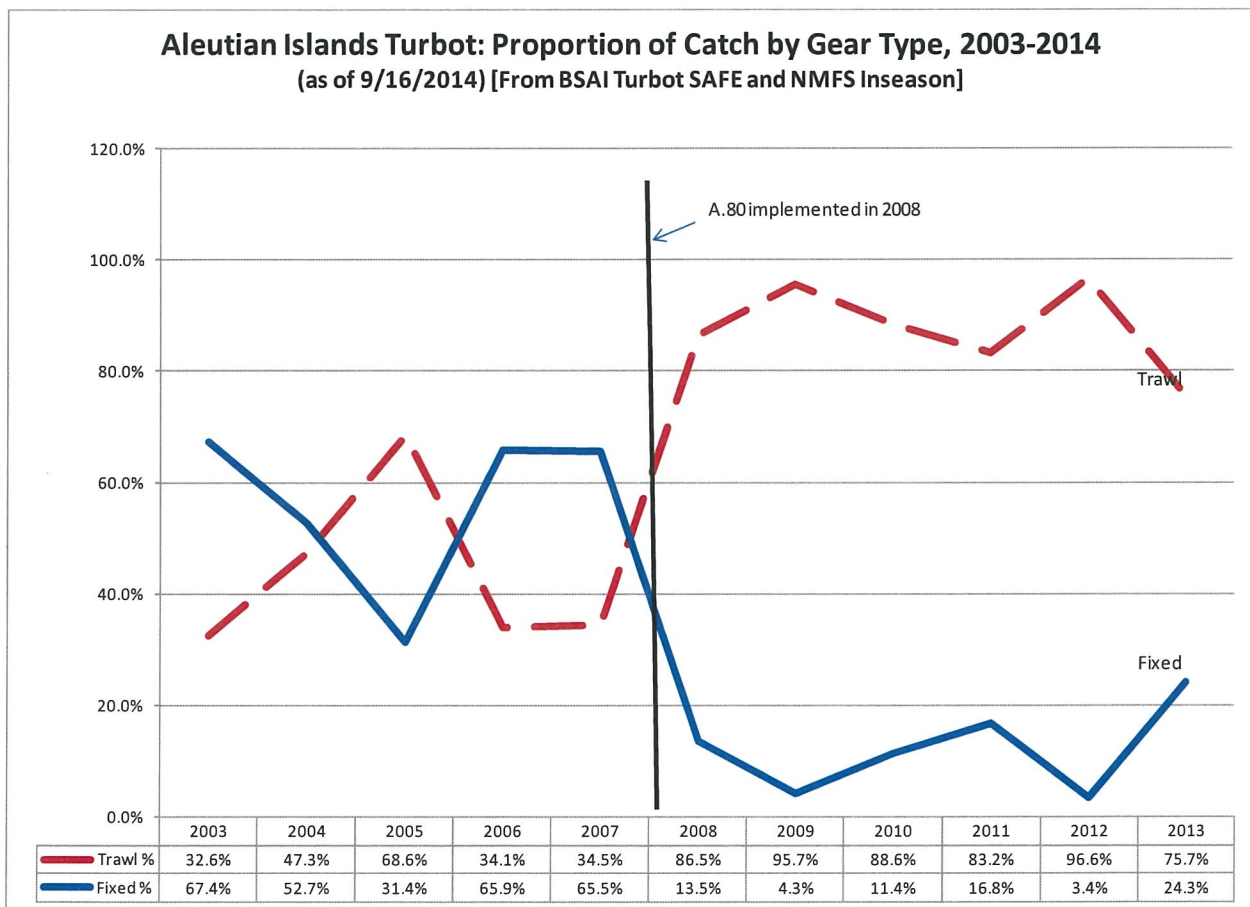
Prior to the implementation of Amendment 80 in 2008, the proportion of BSAI turbot harvest was **73%** longline and **27%** trawl (1998-2007).

After the implementation of Amendment 80, the proportion of BSAI turbot harvest shifted to **43%** longline and **57%** trawl (2008-2013). The longline share is steadily shrinking (2011-2013). Amendment 80 did not address turbot allocations, but the increased flexibility resulting from the A.80 program has resulted in the increased targeting of turbot by trawl CPs.

Prior to 2008, turbot was on bycatch status year round for trawl gear. For longline, turbot was on bycatch status on 1/1, and the directed fishery opened in both the AI and EBS on 5/1. In 2008, the A. 80 vessels began retaining a significant catch of turbot in the arrowtooth and Kamchatka flounder fisheries that coincided with the directed turbot fishery. In 2011, the MRA for turbot in the arrowtooth fishery was increased to 7% (formerly a zero percent MRA).

After numerous early closures of the directed fishery after 2008, the two sectors tried to negotiate a catch share agreement but were unsuccessful. In 2012, the Council initiated an analysis with a

problem statement and alternatives (passed 10-1). The analysis has not moved forward, and has yet to be scheduled on the three meeting outlook. In early 2013, the two sectors arrived at an interim arrangement (not a catch share agreement) that had the A.80 sector trying to stay away from turbot in the AI. In order for the EBS directed fishery to open, the start date was delayed until Sept 1 when the directed trawl fishing for arrowtooth and Kamchatka flounder closes. However, the 9/1 start date increases the amount of depredation by killer whales on longline turbot gear. For 2013 and 2014, there was no directed fishery for turbot in the AI for any gear. The expectation is that the final catch in EBS for 2014 will be similar or close to the proportions 2013. Negotiations are still ongoing but may not result in a catch share agreement. The BSAI turbot ABC is expected to increase in 2015.



Prior to the implementation of Amendment 80 in 2008, the proportion of AI turbot harvest was 57% fixed gear and 43% trawl (2003-2007).

After the implementation of Amendment 80, the proportion of AI turbot harvest shifted to 88% trawl and 12% fixed gear (2008-2013).

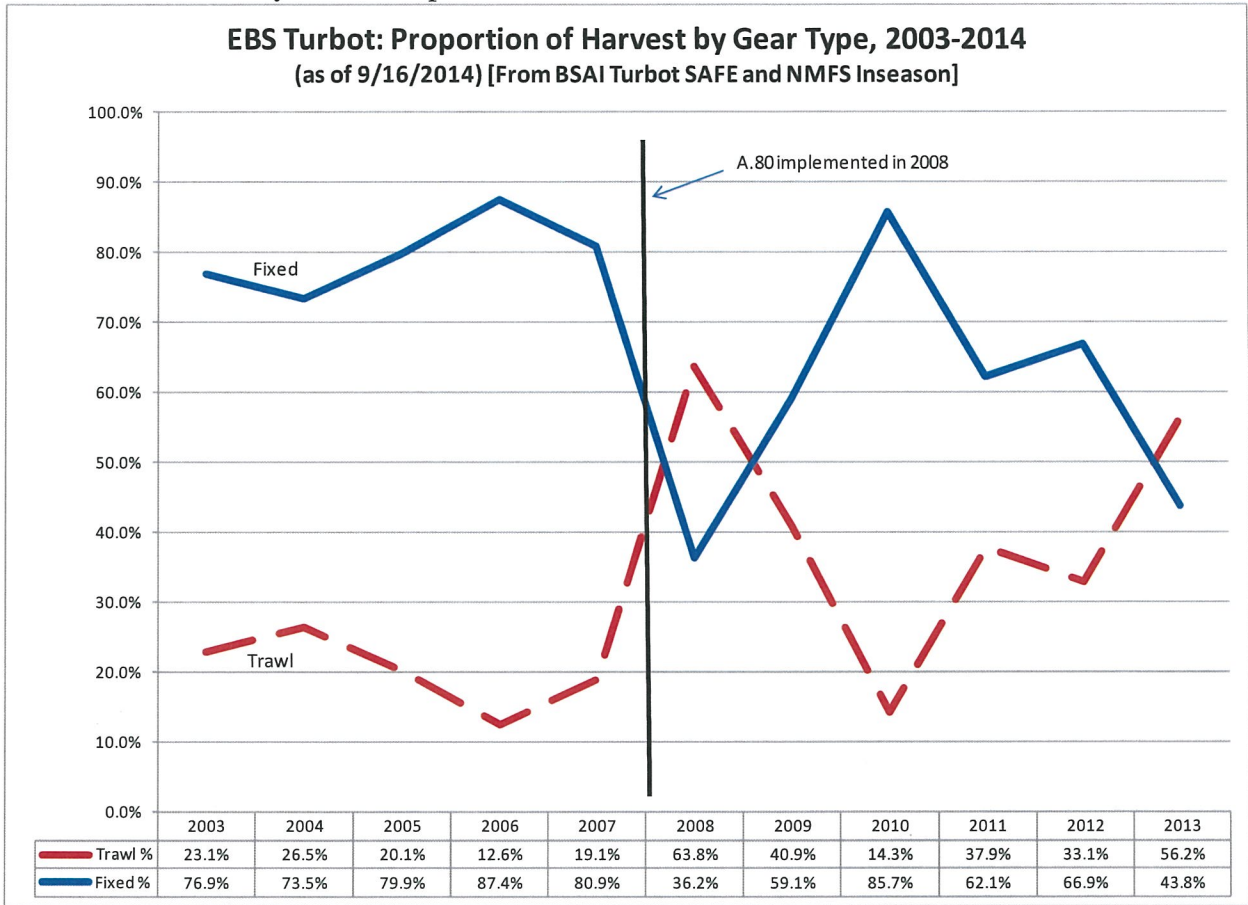
2008: Directed fishery opened 5/1 and closed 8/15.

2009: Directed fishery opened 5/1 and closed 5/28.

2010: Directed fishery opened 5/1 and closed 6/29.

2013: Directed fishery does not open.

2014: Directed fishery does not open.



Prior to the implementation of Amendment 80 in 2008, the proportion of EBS turbot harvest was 80% fixed gear and 20% trawl (2003-2007).

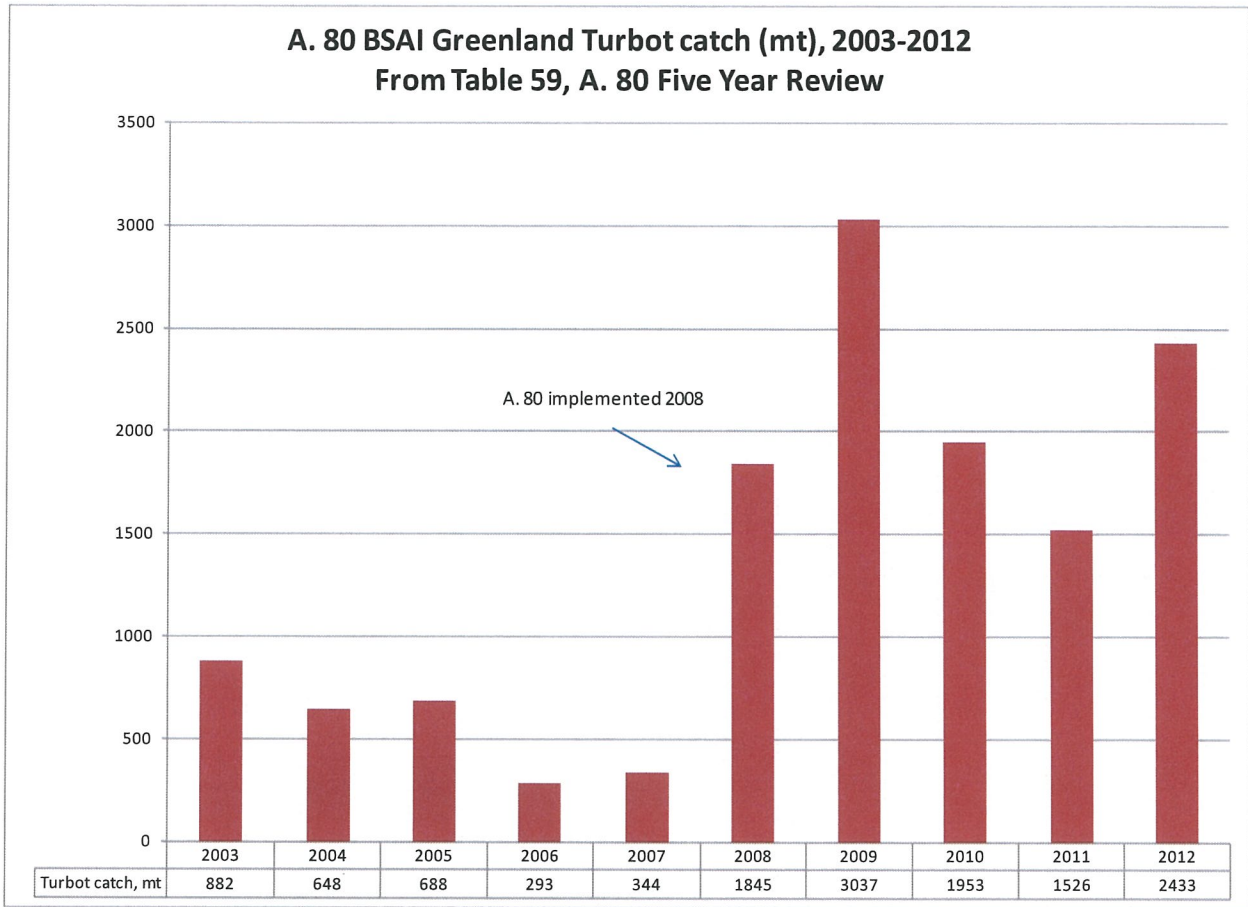
After the implementation of Amendment 80, the proportion of EBS turbot harvest shifted to 59% fixed gear and 41% trawl (2008-2013). The fixed gear proportion declined to 43.8% in 2013.

2008: Directed fishery opens 5/1 and closes 8/1.

2009: Directed fishery opens 5/1 and closes 6/19.

2013: Directed fishery delayed and opened on 9/1.

2014: Directed fishery delayed and opened on 9/1.



The 2003-2007 average catch of BSAI turbot by A.80 vessels is 571 mt/yr.

The 2008-2012 average catch of BSAI turbot by A.80 vessels 2159 mt/yr (a four-fold increase).