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January 28, 2014

Mr. Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Ave, Suite 306  
Anchorage, AK 99501-2252

RE: Agenda Item E-1, Staff Tasking: Sablefish IFQ Vessel Caps

Dear Chairman Olson,

On behalf of the Freezer Longline Coalition (FLC), I would like to submit comments to the North Pacific Fishery Management Council (the Council) suggesting potential changes to the sablefish IFQ program. The following provides information on the need for modifications to the program and specific changes we would recommend to be considered by the Council.

**About FLC**

The FLC represents the owners and operators of the nearly 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. 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. The HAL CP fleet is predominantly a single-species P-cod directed fishery fleet, but a limited number of vessels are also historical participants in the sablefish IFQ fishery. This fishery provides an important additional source of revenues for the vessel operators and crew who participate in the fishery.

**Problem statement - Why change the sablefish IFQ program?**

There are two key purposes for pursuing changes to the current sablefish IFQ program: improving operating efficiencies for vessels participating in the fishery and maximizing utilization of sablefish in the Bering Sea and Aleutian Islands.

- *Improving efficiencies:* From an efficiency standpoint, the 1% vessel cap is too low for freezer longline vessels to operate in the fishery efficiently. The smallest freezer longline vessels are about 125' and hold about 325,000 lbs of fish. Under the 1% vessel cap, the 2013 IFQ allocation amounted to 280,139 lbs of sablefish, or about 204,000 H&G lbs. This amounts to about only half a load of fish for the smallest freezer longliners, and less so for larger vessels. The high operational costs of harvesting the



