

FISHING VESSEL OWNERS' ASSOCIATION INCORPORATED

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SINCE 1914

September 25, 2014

North Pacific Fishery Management Council
605 W. 4th Ave., Ste 306
Anchorage, AK 99501-2252

RE: December Meeting, Scoping Report on Halibut Vessel Harvest CAPs/Sablefish Class A Vessel Harvest CAPs

Dear Mr. Chairman:

The Council staff, as directed by the Council members, is currently developing a scoping report on vessel harvest caps for the Halibut QS program and Class A Sablefish. The members of the Fishing Vessel Owners Association (FVOA) request that the Council expand this scoping exercise to include Class B and C Sablefish.

The concerns and impacts on the fleet and their crews from reducing TACs for sablefish are similar to the issues the Council discussed for halibut Vessel Harvest Caps and Class A sablefish. Below are the historical "All Areas Sablefish" vessel Caps.

Year	All Sablefish Vessel Cap	Year	All Sablefish Vessel Cap
1997	302,339	2006	345,461
1998	298,459	2007	334,504
1999	271,541	2008	299,671
2000	299,261	2009	264,883
2001	291,206	2010	248,767
2002	293,882	2011	267,947
2003	348,635	2012	293,269
2004	379,368	2013	280,139
2005	357,652	2014	236,796

The all sablefish vessel Cap has dropped from a high of 379,368 round pounds in 2004 to 236,796 pounds for 2014. This represents a 37% reduction in vessel harvest caps. The members of FVOA request that the Council expand the scoping document to include sablefish vessel categories, both B and C, and to look at 230,000 lbs. as a vessel floor cap should all areas of sablefish harvest be reduced lower than the 2014 harvest limit. As harvest limits drop, smaller

individually held quota poundage will need to move off some vessels on to others that can more efficiently cover expenses and provide attractive crew shares. Otherwise, quota will be stranded. We suspect that this is part of the reason the Bering Sea, Aleutians and Western Gulf sablefish TACs continue to not be achieved.

Sincerely,

A handwritten signature in black ink, appearing to read "R. D. Alverson", with a long horizontal flourish extending to the right.

Robert D. Alverson
Manager

RDA:cb