

Results and Accountability

- In 2014, using actual observed DMR (**7.9%**), the CP H&L mortality rate was less than 6 pounds halibut per metric ton of groundfish (2204 lbs).
- For 2015, to date, the rate is **4.4 lbs halibut mortality per mt of groundfish**.
- BSAI CP H&Ls are **100%** observed and are fully accountable. Vessels are equipped with VMS, video monitoring, and flow scales (**100%** of the catch goes across the scale).

Summary

- The FLC has a long history of dependence on the p-cod fishery in the BSAI and WGOA.
- The participants in this sector have made considerable investments and incurred considerable debt (\$39 million) to reduce overcapitalization via a vessel/permit buyback.
- There is significant Alaskan investment in this sector (including CDQ groups).
- Sector produces high quality seafood products in a sustainably managed fishery with minimal bycatch.

FLC Recommendations

- Request the BOF to **not** adopt proposals to increase the allocation to the GHL in SAP (Proposals 10 & 11) and in Area O (Proposals 15 & 16) or the size of the area (Proposal 15).
- Request the BOF to consider re-instating the **“Guiding Principles for Groundfish Fishery Regulations”** and to consider actions consistent with those principles to temporally and spatially disperse p-cod harvest in the GHL fisheries (i.e. reduce concentration of harvest and prevent localized depletion; and extend season length).

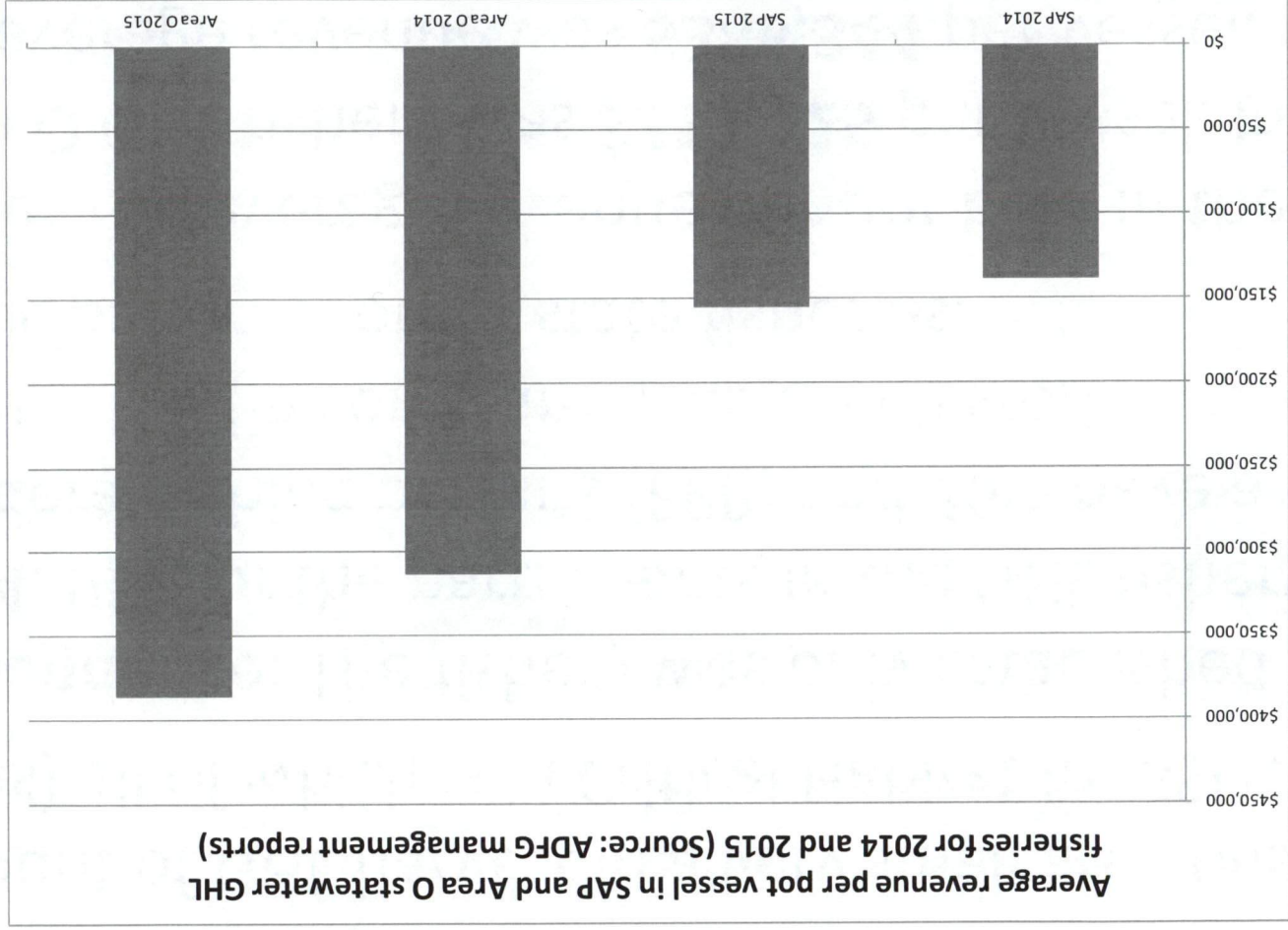
Rationale: South Alaska Peninsula

- In the WGOA in 2014, **51%** of the harvest is already inside of 3 miles (SAP GHL harvest + parallel harvest). The BOF just recently increased the GHL allocation from 25% to 30% effective in 2014.
- NMFS letter states further reductions in the federal fishery (due to increases in the GHL allocation) may result in closure of directed fishing to some federal sectors.
- The average revenue per pot boat in the 2014 SAP GHL fishery is **\$138,000** per vessel (in an 18 day season). In 2015, the average revenue was **\$187,871** per vessel.

Rationale: Area O

- Proposals would result in a concentration of a large amount of GHL harvest in a very small area (inside 3 miles) all of which is in Critical Habitat for SSLs.
- **Dependence:** The fishery was only established in 2014. 95% of the participants in the GHL fishery have a federal fishing permits (FPP) and 76% have a federal LLP (in some area) as well historic participation in other state fisheries.
- **Need:** The average revenue per pot boat in the 2014 Area O GHL fishery was **\$313,125** per vessel. In 2015, the average revenue was **\$386,344** per vessel.

**Need: Average revenue per pot vessel in 2015:
 Area O = \$386 K/boat. SAP = \$155 K/boat
 (Revenue is up in 2015 from 2014 in both areas)**



Opportunity exists in the federal <60 fixed gear fishery (pot and longline)

- As of November 7, 2015, the <60 federal fixed sector has caught **65%** of its current allocation. There is **4337 mt** remaining (**9.56 million pounds**) left to be caught (out of total **12,830 mt** or **27.3 million pound allocation**).
- Over **80%** of the <60' federal fixed gear participants are Alaskans – so reallocation from the federal fishery to the GHL fishery would be reallocating from some Alaskans (with BSAI LLPs) to other Alaskans (who did not purchase BSAI LLPs or who do not want observer coverage, VMS etc).