

FISHERY MANAGEMENT PLAN or REGULATORY AMENDMENT PROPOSAL
North Pacific Fishery Management Council – Steller Sea Lion Mitigation Committee

Name of Proposer: United Fishermen's Marketing Association, Inc.
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Date: August 15, 2006
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Fishery Management Plan: Bering Sea/Aleutian Islands Groundfish

Brief Statement of Proposal: Change the "A Season" and "B Season" BSAI p. cod ITAC apportionments for the pot Catcher Vessel $\geq 60'$ Sector to 80% (A Season) and 20% (B Season), respectively.

Objectives of Proposal (What is the problem?): Under current SSL protection measures, the BSAI p. cod pot Catcher Vessel $\geq 60'$ sector has historically not been able to harvest their B Season allocation. This is primarily due to aggregations, availability and weather that exist during the B season. Moreover, unused p. cod from this sector is rolled over to other sectors. This unused allocation results in a significant economic loss and the forfeiture of allocated economic opportunity. The apportionment of ITAC as modified by Amendment 85 will exacerbate this occurrence, leading to a continued and increased economic loss. That is, Amendment 85 implements seasonal apportionments of the allocation to the fixed gear sector that keeps the percentage of the fixed gear ITAC during the A season the same as status quo (i.e., 30.2%), which has the effect of implementing a 51% A Season/49% B Season distribution.

Need and Justification for Council Action (Why can't the problem be resolved through other channels?): The Council is the appropriate authority to address SSL protection measures.

Foreseeable Impacts of Proposal (Who wins, who loses?): The BSAI p. cod pot Catcher Vessel $\geq 60'$ sector is better able to maximize efficiency and the harvest of their allocation. The impact of removals from the p. cod ITAC resulting from an 80 percent A Season apportionment is minimal. For example, applying the Amendment 85 A Season/B Season fixed gear split (51%/49%) to the 2007 BSAI p. cod ITAC for the pot Catcher Vessel $\geq 60'$ Sector (10,567 mt), the difference between the Amendment 85 "A Season" allocation and the proposed 80% "A Season" allocation is approximately 3,000 mt (approximately 2.4 % of the total ITAC). The principle of maintaining a 70/30 A Season/B Season distribution of the BSAI p. cod harvest is preserved. No one loses. See attached tables and reference documents indicated below.

Are there Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?: There do not appear to be alternative solutions that provide the necessary protections for SSL that are required by the ESA, and that provide the efficiency and economic benefits that are contemplated in this proposal.

Supporting Data & Other Information. What data are available and where can they be found? Be specific and cite references: See

- (1) Fishery Interaction Team (FIT) Report "Pacific cod localized depletion study" (Peter Munro and Liz Connors) presented to SSL Mitigation Committee during the May 16-18, 2006, meeting;
- (2) "Insights into the Timing of Weaning and the Attendance Patterns of Lactating Steller Sea Lions (*Eumetopias jubatus*) in Alaska During Winter, Spring, and Summer" (Trites, et al.) discussed during the May 16-18, 2006, SSL Mitigation Committee meeting.

Offsetting Measures. OPTIONAL - What protection measures might be increased in the region to offset the proposed action?: This proposal appears to have such minimal impact that no offsetting measures will be needed.

Signature: Jeffrey R. Stephan, United Fishermen's Marketing Association, Inc.



Date	TRAWL CP				TRAWL CV				TOTAL
	% of ITAC	Season	Trawl CP Seasonal % of Allocation	Trawl CP Seasonal % of ITAC	% of ITAC	Season	Trawl CV Seasonal % of Allocation	Trawl CV Seasonal % of ITAC	
	15.7%				22.1%				37.8%
1-Jan	(no fishing allowed with trawl gear 1/1-1/20)								
20-Jan		A	74.8%	11.8%			74.4%	16.5%	28.2%
1-Apr		B	25.2%	4.0%			10.6%	2.4%	6.3%
10-Jun		C	0.0%	0.0%			14.9%	3.3%	3.3%
10-Jun	(no cod target allowed with trawl gear after 11/1)								
31-Dec									
TOTAL	100%		15.7%		100%		22.1%		37.8%

23.50%	92.50%	23.50%
old allocations to trawl CP		old allocations to trawl CV
50%		70%
30%		10%
20%		20%

Date	All Other Fixed Gear >60'				POT CV >60'		JIG				>60' Fixed & Jig % of ITAC	<60' Fixed % of ITAC	Total trawl, fixed and jig % of ITAC*	Total trawl, fixed and jig % of TAC*	CDQ	TOTAL TAC	
	Percent of ITAC	Season	Seasonal % of Allocation	Seasonal % of ITAC	Seasonal % of Allocation pot CV	Seasonal % of ITAC pot CV	Percent of ITAC	Season	Seasonal % of Allocation	Seasonal % of ITAC							
	50.4%				8.4%						1.4%	60.2%	2.0%	100.0%	92.5%	7.5%	100.0%
1-Jan																	
20-Jan																	
1-Apr		A	51%	25.7%	80%	6.7%		A	60%	0.8%	33.5%	no seasonal allocations*	70.0%	64.8%	4.5%	69.3%	
1-Apr								B	20%	0.3%							
10-Jun								C	20%	0.3%	26.7%		30.0%	27.7%	3.0%	30.7%	
10-Jun																	
1-Nov		B	49%	24.7%	20%	1.7%											
31-Dec																	
TOTAL	100%		50.4%		8.4%			100%		1.4%	60.2%		100.0%	92.5%	7.5%	100.0%	

*The <60' fixed gear sector does not currently have seasonal apportionments. This table assumes that the <60' fixed gear sector harvests their entire allocation of 2% in the first half of the year (prior to June 10). Also assumes first two seasons of the

51%	old allocations to fixed gear
60%	
40%	

pot cp	1.50%
nonafa cp	13.40%
H&L >60'	0.20%
jig	1.40%
<60 fixed	2.00%
AFA CP	2.30%
trawl CV	22.10%
FLL	48.70%
pot CV	8.40%
total	100.00%

Scenario	A season allocation for Pot CV >60'		
	As percent of ITAC	As percent of TAC (7.5% CDQ allocation)	As percent of TAC (10% CDQ allocation)
Status quo			
A season	4.6%	4.2%	4.1%
Am. 85 A season (51% - 49% split)	4.3%	4.0%	3.9%
Am. 85 A season (with proposed 80%-20% split)	6.7%	6.2%	6.0%