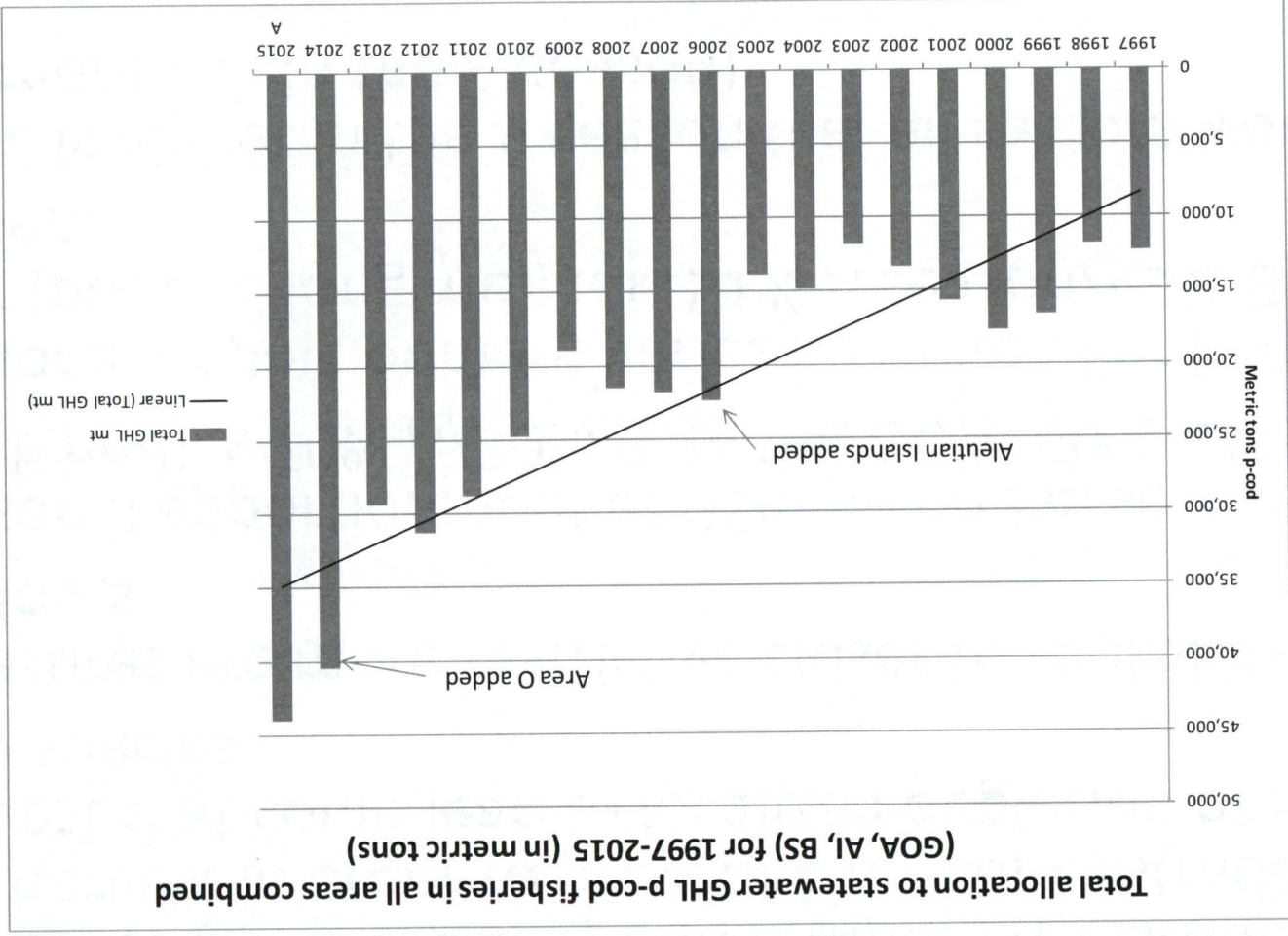


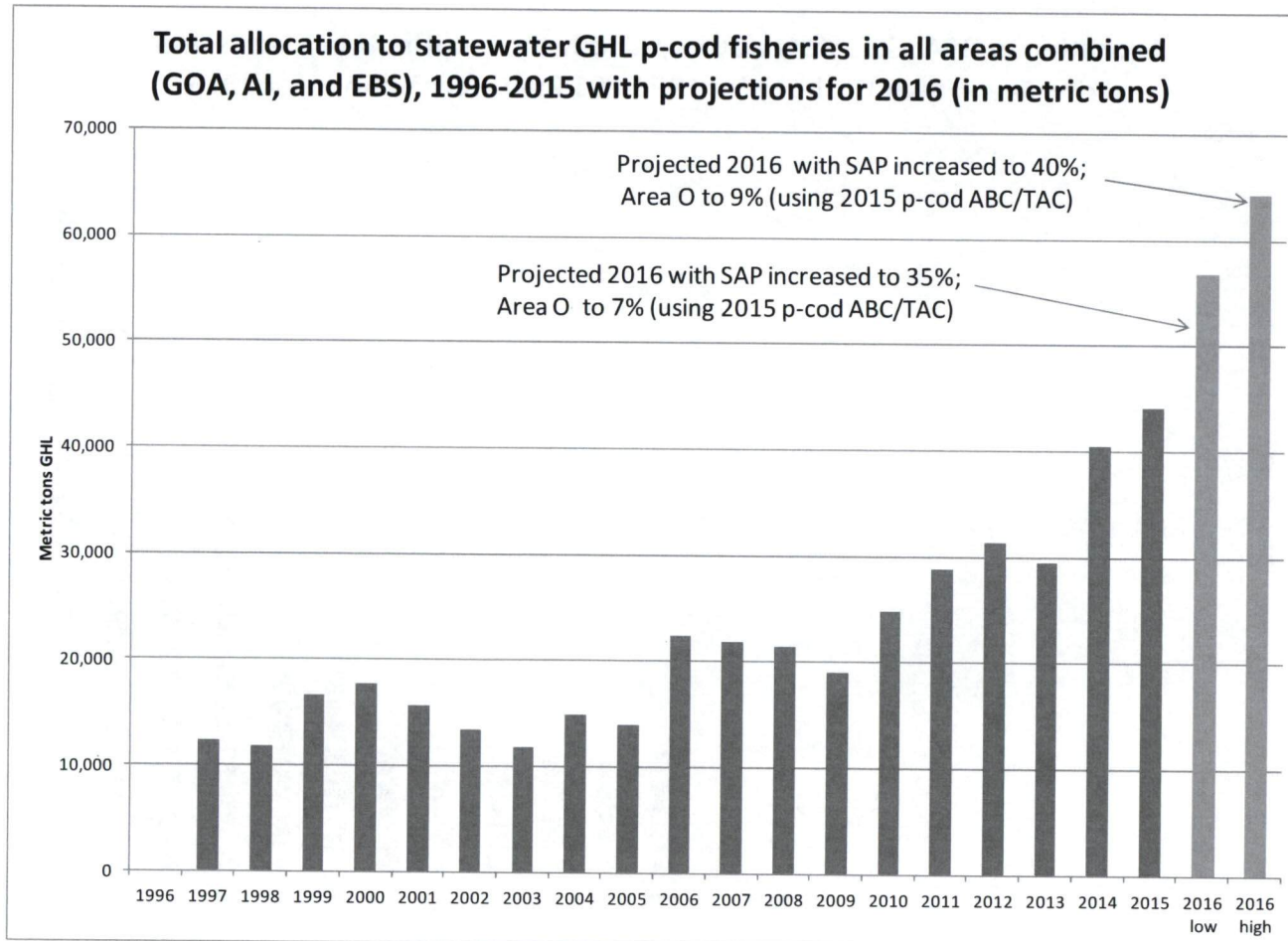
Steller Sea Lion Management for P-cod

- Measures are to spatially and temporally distribute p-cod harvest in order to prevent over-concentration of harvest that could lead to localized depletion of SSL prey species.
- Measures are more restrictive closer to rookeries and haulouts.
- Seasonal apportionment of BSAI p-cod (all sectors combined) is 70% A/30% B. In the GOA: 60% A/40% B.
- Seasonal apportionment varies by sector. For BSAI fixed gear (pot and longline), it is 51% A season/49% B season.
- CPUE is higher in the A season (i.e. all sectors would like more fish in the A season).

The total allocation to statewaters GHL p-cod (in all areas combined) has increased **4X** from 1997 to 2015.

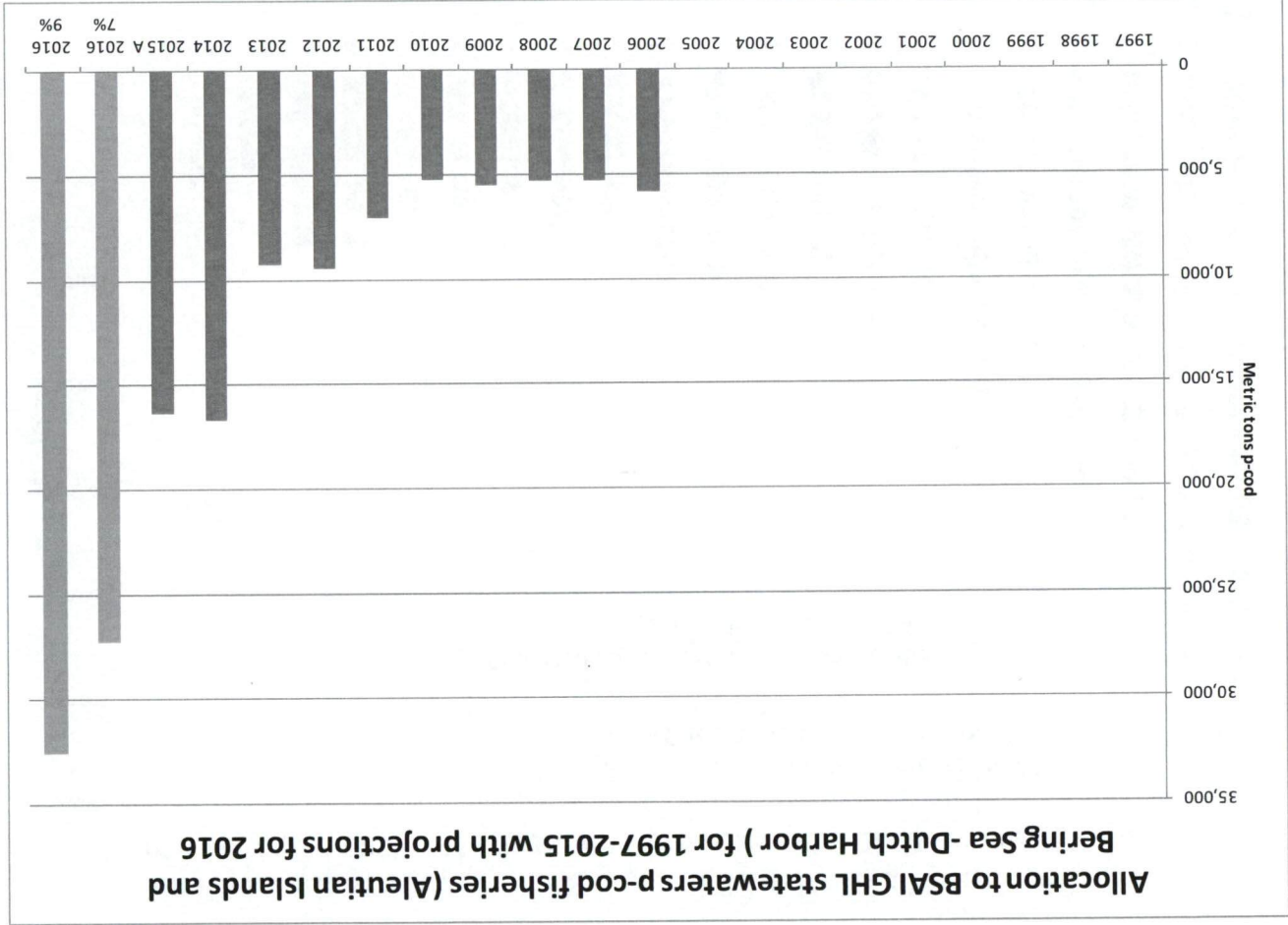


The current BOF proposals could increase the allocation to the combined GHL fisheries an additional **+46%** in 2016 (using 2015 ABC/TACs), an increase of **5.2 X** from 1997 to 2016 (or **+420%**).

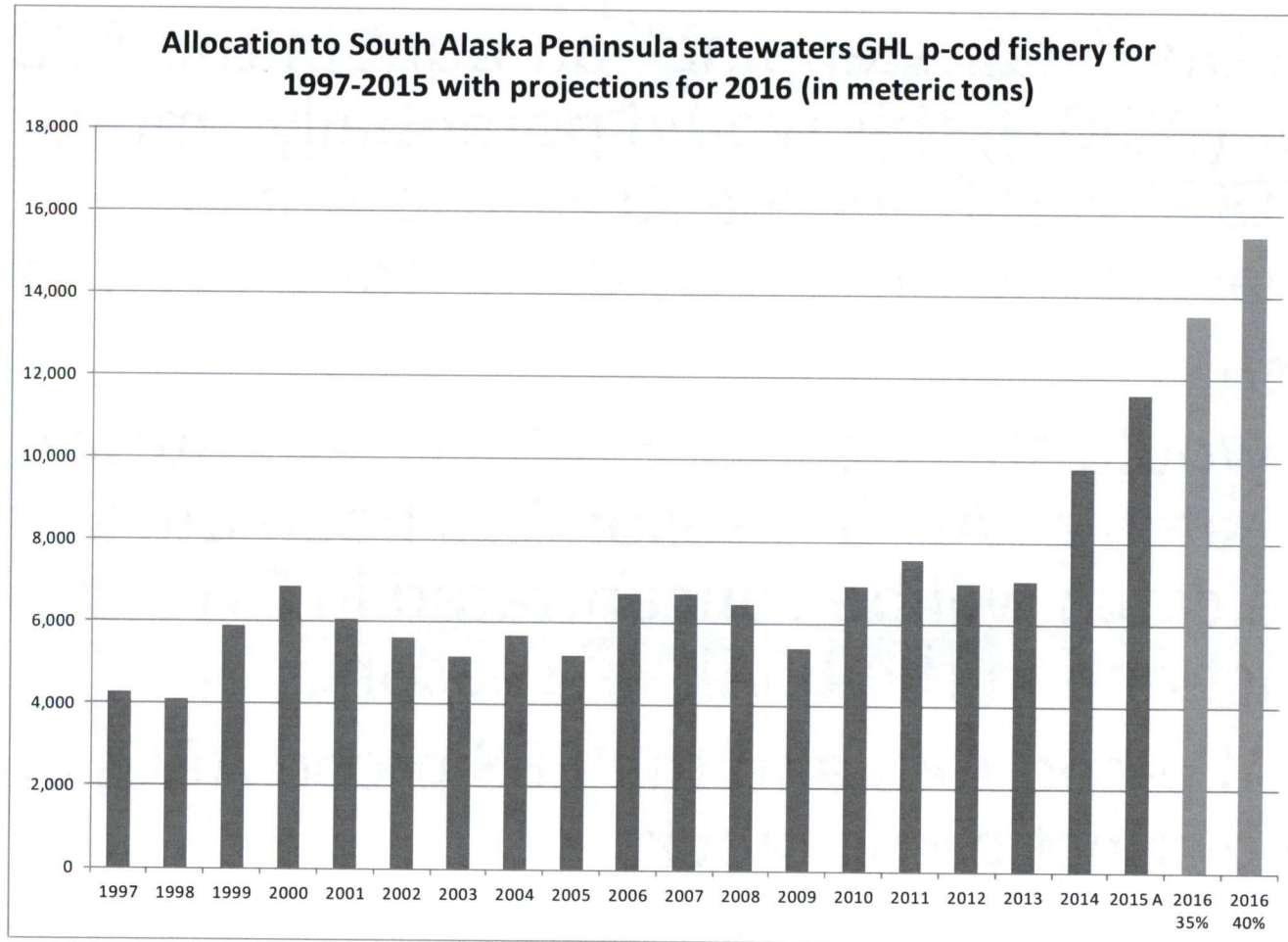


GM-FLC

The 2015/2016 BOF proposals could increase the allocation to BSAI **GHL** fisheries **+67% to +100%** (an increase of **4.7 X to 5.6 X** from 2006 to 2016 – or **+370%** to **+460%**).



The 2015/2016 BOF proposals could increase the allocation to the SAP GHL fishery up to **+33%** (or an increase of **3.2 X to 3.6 X** from 1997 to 2016).



GM-FLK

Effect of moving the uncaught AI "B" season to Area O "A" season

- With the "stair stepping" amount in the ACDC letter (PC-01), this would potentially "move" 3 M lbs (1315 mt) from the AI GHL to Area O – increasing the Area O by 0.5% (for a total of 3.5%).
- This would still increase total BSAI statewater GHL catch as AI "B" season has been uncaught. More catch will be concentrated in DH sub-district and in the BSAI "A" season.
- The AI p-cod ABC and the EBS p-cod ABCs are now distinct p-cod stocks.

Endangered Species Act considerations

- My experience from involvement 2001 SSL litigation; 2010 SSL litigation; 2014 SSL litigation; NPFMC SSLMC; and U.S. Pacific Salmon Treaty (ESA Snake River chinook).
- ESA is a very inflexible and rigid statute.
- Once entangled in ESA, it is difficult to become disentangled. It is difficult to prove a “negative” (i.e. that a fishery is not causing harm to the listed species or its critical habitat– JAM).
- Litigation and ESA compliance is very expensive. State of Alaska previously used outside legal counsel.

State of Alaska is not well positioned for purposes of ESA compliance

- No seasonal apportionment of harvest (no A/B)
- GHL fisheries have become increasingly more concentrated spatially (increased amount of harvest from inside three miles in CH)
- GHL fisheries have become concentrated temporally as season length has been decreasing.
- No comprehensive survey of p-cod biomass distribution within three miles
- No limited entry for GHL fisheries

ESA (con't)

- There is an ITS (incidental take statement) for the federal and parallel fisheries.
- There is **no ITS** for the statewater GHL p-cod.
- “Guiding Principles for Groundfish Fishery Regulations” repealed by BOF.
- No “Wildlife Conservation Action Plan” for SSLs on ADFG website (was slated to be updated; now removed from State Wildlife Action Plan).
- No “Habitat Conservation Plan” for SSLs (ESA Section 10).

ESA (cont)

- ESA advice: The State GHL fisheries are vulnerable (and hanging out there) in regards to ESA.
- A Section 10 for the GHL p-cod fisheries may have the potential to bring in consideration of additional State fisheries (pollock GHL, salmon, and herring – all SSL prey species).
- On BOF proposals to increase allocation: “Most guys wouldn’t weld that close to a gas tank.”