



Ph. 206.284.2522  
2303 W Commodore Way Suite 202  
Seattle, WA 98199  
[www.freezerlonglinecoalition.com](http://www.freezerlonglinecoalition.com)

---

---

October 12<sup>th</sup>, 2012

Mr. Larry Cotter, Chairman  
SSL Mitigation Committee

RE: FLC recommendations to the Council for alternatives RPAs for inclusion in the Steller sea lion mitigation measures EIS currently being prepared by NMFS.

Name: Freezer Longline Coalition  
Address: 2303 W Commodore way # 202 Seattle, WA 98199  
Email: [kennydown@comcast.net](mailto:kennydown@comcast.net)

Brief Statement of Proposal –

- Reinstate the pre-2010 RPAs to allow fishing for cod in the Aleutian Islands management area. Establish a cap on cod removals based on best estimate of cod biomass at ACL/TAC.

Objectives of Proposal

Problems:

- The RPA based on the November 2010 BiOp severely restricts cod fishing opportunities in the Aleutian Islands.
- Restrictions unnecessarily cause severe financial losses to Freezer Longline Fleet while it is recognized that cod are not an important food source for Sea lions.
- Reduced fishing area causes fishing pressure to be focused more intensely on remaining open areas, which can lead to localized depletion.

Proposed changes to the regulations

- Reopen critical habitat west of the Segum foraging area except outside of 3 miles from rookeries and within 10 miles of Buldir rookery.

Justification:

- The CIE and Bernard et al, note that there is no evidence that the current RPA is beneficial to SSLs. If they provide no benefit they are unnecessary.

### Impacts of Proposal

- Both the CIE and the State of Alaska’s independent review conclude that there is no evidence of positive or negative impact on SSLs from cod fishing in the AI
- Increasing spatial dispersion of the fishing effort may be beneficial in preventing localized depletion of cod stocks.
- Spatial dispersion of fishing effort in the EBS will also improve fishers efforts to reduce halibut bycatch which will improve their ability to harvest the cod TAC.

### Supporting data and other documentation—

- The “Independent, Scientific Review of the Biological Opinion (2010)” by Bernard, et al, and the three reviews of the BiOp by the Center for Independent Experts question the basis of the 2010 BiOp RPAs.

### Alternative solutions

- The NPFMC proposed RPA in response to the draft 2010 BiOp.

### Justification for Council action

- If the NPFMC fails to take action, fishing will be forced to continue in compressed areas. This will potentially lead to localized depletions of cod. It will also contribute to unnecessarily high halibut bycatch, and to inability to achieve TAC in the EBS. The existing RPA under the 2010 BiOp unnecessarily cause severe financial losses on traditional users of this resource.