

**Notes on the Area 4 Leasing Analysis:**

ACDC doesn't have a position on the Alternatives and Options at this time.

ACDC is concerned that the analysis has identified potential negative impacts and would like a better understanding of the scale of those impacts.

Section 3.8.2 states - "However, Alternative 2 could plausibly have negative indirect effects on some stakeholders of the halibut IFQ fishery. It is possible this action could result in a displacement of some crew jobs, for the duration of time that the halibut catch limits are low enough to allow IFQ leasing, potentially disadvantage vessel owner (to the extent that they are not also the QS holder), and potentially disadvantage some processors (to the extent that they are not the primary processor for both IFQ and CDQ halibut from the area)."

Section 3.8.3 states - "Prompted by objective number 6, assure that those directly involved in the fishery benefit from the IFQ program by assuring that these two fisheries are dominated by owner/operator operations," the Council has made a number of regulatory amendments to the program that continue to limit the amount of leasing and hired skipper use that occurs in the fishery. .... The proposed action may be considered counter to this purpose, as it allows for an avenue to lease halibut QS without any owner-on-board provisions."

A shift from quota being fished on a vessel delivering in Adak to a CDQ vessel, shifts the processing of that fish between the communities.

At this point ACDC has a very limited understanding of the potential scale of the shift. ACDC would like to see an estimate of the pool of 4B QS holders who currently are fishing their IFQ on vessels they don't own. (These are the QS holders most likely to have an incentive to save the airfare and time involved going on board a vessel when they could take advantage of a lease that would allow them to stay home.) ACDC would also like to have a better understanding of the pool of 4B "lease-able" quota under status quo.

To better understand the action ACDC would like the final draft of the analysis to address the following questions:

- How many vessels in 4B have hosted quota owners where the quota owner is not the vessel owner?
- What portion of the area 4B B & C share QS is grandfathered in for "leasing" to hired masters (available to lease under status quo)?
- What portion of the area 4B QS is A share eligible for "leasing" to hired masters (available to lease under status quo)?
- How many vessels (by size class) have actively fished in the last few years in 4B?
- What have the vessel use caps been in 4B for the last few years in relation to the 4B TACs? How many vessels were at or near the cap?
- Does the 51 foot limit allow any vessel to harvest leased IFQ on behalf of a CDQ group, or only <51' vessels owned by the CDQ group, or only by <51' vessels owned by residents of a CDQ group?
- What would the impact be of limiting the leasing exemption to 4B QS holders with less than 2,000 or 5,000 lbs of IFQ?

