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**Participation and Effort in the BSAI Trawl Limited Access Yellowfin Sole Fishery
Agenda item C1, February 2016**

Green Hope, LLC comments on the discussion paper and recommendations for next steps

The issue of limiting participation in the yellowfin sole trawl limited access sector (TLAS) was raised in Oct. 2015 because of a claim that 'new participants' in 2015 were negatively impacting the 'historic participants' in the fishery and because halibut savings were in jeopardy. Neither of these claims are supported by the discussion paper, but the following points are clear.

- Discussion paper shows the yellowfin fishery has closed only in two recent years. The fishery closed Nov. 11, 2015 when yellowfin quota was taken and Nov. 10, 2013 for that same reason (see Table 4). The fishery opens Jan. 20 each year so it was open for nearly 10 months in both of these years and in all other years the yellowfin quota has not been caught and the fishery remained open from Jan. 20 – Dec. 31.
- The only year halibut bycatch was limiting was 2014, which was prior to the 'new participants' entering the fishery. In 2014, the historic participants exhausted the 167 mt halibut allocation in May in spite of them having an agreement 'to control bycatch' (see USSF letter). Participants needed a 60 mt halibut reallocation from the cod fishery in order to continue that year (see Table 4).
- In 2015, over 25% (43 of 167 mt) of the halibut remained unused in spite of vigorous claims at the October meeting that the fishery was out of control. New participants did nothing to jeopardize the 10% savings that APA/USSF had committed to or the 22.5% savings they privately hoped to achieve according to their testimony in Oct. 2015.
- The allocation to the TLAS fishery is at a historic low (see Table 1) so if participation is limited to the 'historic participants' and the yellowfin sole TAC increases it will create a windfall for those that would qualify under their proposal. When the TLAS allocation increases it also creates a high likelihood that the quota won't be harvested in the future unless the new participants are allowed to remain in the fishery.
- If Alternative 2, as presented in the USSF comment letter, were adopted it would result in AFA C/Ps and the USSF catcher vessels being the only qualified participants for the fishery (see Tables 7 & 8). Yes, a shoreside delivery option would remain, but there is no shoreside market. Table 8 also makes it clear that under their Alternative 2 a number of early and late participants would not qualify even though they have history in the fishery and have done nothing wrong.

For an owner of a non-AFA trawl catcher vessel there are a limited number of BSAI fishery options available. We have invested in the F/V Green Hope so that it can participate in the yellowfin TLAS fishery. The discussion paper does not provide any evidence that our participation or that of any other 'new participant' is putting this fishery in jeopardy. We ask that no further action be taken on this agenda item.