

GHL be included in the ICA, it would also provide NMFS and the Council with additional opportunity to manage bycatch all Bering Sea fisheries, state-waters included.

Long-term, FLC would like to see the Council develop a long-term solution to the HAL CP sector being subject to exclusion from the AI P-cod fishery in future years. Based on current projections and modeling, the ABC for AI P-cod is unlikely to be significantly different from 2014 for the foreseeable future. The AI P-cod SAFE presented at the November 2013 Plan Team meeting projects the 2015 ABC to be identical to 2014, at 15,100 MT. Given this, it's critical that a management plan be developed that ensures the HAL CP sector will have an opportunity to continue operating in the AI.

FLC recommends that Council initiate a discussion paper examining potential management strategies to ensure participation in the AI P-cod fishery by the HAL CP sector and others who have historically participated in the fishery. This paper would review previous efforts to develop a more defined management plan for the fishery under a BSAI split (some of which could be drawn from the April 2013 discussion paper titled "Overview of Apportionment of BSAI Pacific Cod Sector Allocations Between BS and AI Areas and AI Pacific Cod Processing Sideboards"), identify additional unintended consequences of the current, open access management plan, and examine elements of a future management plan for the fishery that would address adverse impacts on fishery participants.

We believe that now is an appropriate time for Council to revisit efforts to address management of the AI P-cod fishery. Efforts in previous years to take on a more ambitious management plan were tabled, in part, due to uncertainties about a number of elements that would impact a future AI P-cod fishery, including the amount of fish available following a split, SSL-related management measures, and what unintended consequences may emerge the confluence of these elements and the default management plan established by the Council. Today, many of the uncertainties surrounding these matters are resolved and unintended consequences are emerging that require the attention of Council. Action to move forward to develop a new management plan for the AI P-cod fishery should be a priority for Council and all stakeholders in the fishery.

Sincerely,



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