


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
 Executive Director 

DATE: April 9, 1999

SUBJECT: Allocation of BSAI Pacific Cod Among Fixed Gear Vessels

<b>ESTIMATED TIME</b> <b>8 HOURS</b> (for all D-1 items)
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**ACTION REQUIRED**

Develop alternatives and timeline for analysis.

**BACKGROUND**

The non-CDQ Pacific cod TAC in the BSAI is currently allocated 51 percent to fixed gear, 47 percent to trawl gear, and 2 percent to jig gear. Within the fixed gear sector, Pacific cod is harvested by vessels using longline and pot gear. Fixed gear vessels are further broken down by whether they are catcher vessels or catcher/processors.

For the week ending March 27, 1999 34 catcher/processors targeted Pacific cod using fixed gear. They were mostly freezer longliners, however pot catcher/processors also participate in this fishery. Traditionally freezer longliners have accounted for the majority of the BSAI fixed gear Pacific cod harvest.

**Pacific Cod Harvests (mt) by Fixed Gear Vessels, 1993-98**

Year	Pot CV	Pot CP	Longline CV	Freezer Longliner
1993	2,000	1,000	0	66,000
1994	6,000	2,000	1,000	85,000
1995	16,000	5,000	3,000	101,000
1996	24,000	8,000	0	94,000
1997	17,000	5,000	0	124,000
1998	14,000		100,000	

Source: Economic Status of the Groundfish Fisheries off Alaska, 1997, for 1993-97 data. Data for 1998 were derived from the NMFS AKR web site ([www.fakr.noaa.gov/1998/bsa98g.txt](http://www.fakr.noaa.gov/1998/bsa98g.txt)).

The License Limitation Program (LLP) would issue approximately 100 fixed gear groundfish licenses to BSAI catcher/processor vessels. These licenses would be valid for either longline or pot gear. Approximately 350 additional fixed gear licenses would be issued to catcher vessels that participate in the BSAI. Licenses are not species specific and any of these vessels could participate in the fixed gear Pacific cod fishery. Prior to adding

gear endorsements to the license, all 548 licensed vessels in the BSAI could have fished Pacific cod using either pot or longline gear. Therefore the number of vessels eligible to use fixed gear in the BSAI has been reduced by about 100, as a result of the Council actions in October 1998. Appendix I provides detailed information on the gear types used by LLP qualified vessels.

Members of the freezer longliner fleet have expressed concern that effort flowing into the Pacific cod fishery could negatively impact their viability. They rely on Pacific cod for the majority of their revenue, and there is a limited number of other fisheries in which they participate.

Because of these concerns, members of the freezer longline sector are requesting that the Council develop a program that would maintain the current fishery structure. Developing that analysis will require that the Council design a suite of alternatives, and set a timeline for initial and final review of the document.

Table 88 also shows the range in the number vessels that are projected to receive one or the other gear designation. The low end of the range is estimated by adding the number of vessels that exclusively used a single gear to the number of vessels that used both gears during the original LLP qualifying period. Thus the low end of the range of catcher vessel that will receive non-trawl endorsements in the GOA is calculated as  $1,898 + 171 = 2,069$ . The high end of the range adds in the number of vessels that have a choice of gear designations. Thus the high end of the range of catcher vessels that will receive non-trawl endorsements in the GOA is calculated as  $2,069 + 15 = 2,084$ .

Table 89 provides a breakdown of gear designations by area endorsements catcher vessel/catcher processor designations and vessel length designations. The table rows are divided into three main sections showing catcher vessels, then catcher processors, and then finally catcher vessels and catcher processors combined. The main sections are separated by double-lines (=====). Within the first two sections (showing gear designations for catcher vessels and then catcher processors) there are four sets of rows showing the four different outcomes for gear designations based on the available data. These four sets are: 1) non-trawl gear designations, 2) trawl designations, 3) both trawl and non-trawl gear designations, and 4) a choice between trawl or non-trawl gear designations. Each set contains rows for each vessel length class in which vessels are projected to qualify. The last row in each main section shows the total number of endorsements that will be issued for each type of vessel. For the GOA, BSAI and LLP total, the rows showing the totals for each set are identical to the to similarly defined rows in Table 88 above. In other words, the projected number of catcher vessels that are projected to receive only non-trawl designations for the GOA is 1,898. This projection is found in the fourth row of numbers and fourth column of numbers in Table 89 and in the first row of numbers and first column of number in Table 88.

The columns in Table 89 show the gear designations of vessels that are projected to receive endorsements for the each subarea and for the GOA and BSAI as a whole. It is important to note that many vessels will receive the endorsements for more than one subarea. For example, the number of licenses for the GOA will be less than the number obtained by adding together the number of endorsements in the Eastern, Central, and Western Gulf subareas. Some vessels will also receive endorsements in both the GOA and the BSAI. Therefore the total number of licenses shown in the last column of the table is less than the total obtained by adding the number of in the GOA to the number in the BSAI.

The Council's LLP will prohibit vessels from using trawl gear in the Eastern Gulf, but vessels that qualify for endorsements in the Eastern Gulf may in fact receive trawl gear designations. Table 89 indicates that at least 10 catcher vessels, 6 catcher processors will receive trawl gear designations and endorsements for the Eastern Gulf. This does not mean that these vessels will be allowed to trawl in the Eastern Gulf, but rather that they will be allowed to trawl in other areas for which they receive endorsements. Vessels that receive trawl designations in the Eastern Gulf will only be allowed to use non-trawl gear.

The first row of numbers in Table 89 indicates that there are 975 catcher vessels that are 59' or less that will receive non-trawl designations in the Eastern Gulf. The table also shows that 981 designations will be issued to small catcher vessels in the Central Gulf and another 122 in the Western Gulf. Adding these three numbers together results in a sum of 2,078. However the total number of small catcher-vessels that are projected to receive non-trawl designations in the GOA as shown in Table 89 is only 1,740. This means that as many as 338 small catcher vessels will receive endorsements in more than one area in the GOA. In the BSAI, Table 89 indicates that 14 small catcher vessels will receive non-trawl designations and endorsements for the Aleutian Islands subarea and that 98 small catcher vessels will receive non-trawl designations and endorsements for the Bering Sea subarea. For the BSAI as whole however, the number of vessels that receive non-trawl designations is also 98. This means that every small catcher vessel that will receive a non-trawl designation and an endorsement for the Aleutian Islands will also receive an endorsement for the Bering Sea. Similar types of observations can be made for vessel in other length classes and catcher-vessel/catcher-processor designations.

Table 89: Groundfish Vessel, Length, and Gear Designations By Endorsement Area

Vessel Length	Eastern Gulf	Central Gulf	Western Gulf	GOA Total	Aleutian Islands	Bering Sea	BSAI Total	LLP Total
<b>Designated Catcher Vessels with Non-Trawl Gear Designations</b>								
0' - 59'	975	981	122	1,740	14	98	98	1,770
60' - 124'	39	120	73	152	36	110	116	205
125' +	0	0	6	6	1	26	27	28
<b>Total</b>	<b>1,014</b>	<b>1,101</b>	<b>201</b>	<b>1,898</b>	<b>51</b>	<b>234</b>	<b>241</b>	<b>2,003</b>
<b>Designated Catcher Vessels with Trawl Gear Designations</b>								
0' - 59'	0	9	10	14	0	8	8	21
60' - 124'	0	23	29	35	8	37	37	42
125' +	0	6	17	17	16	19	19	19
<b>Total</b>	<b>0</b>	<b>38</b>	<b>56</b>	<b>66</b>	<b>24</b>	<b>64</b>	<b>64</b>	<b>82</b>
<b>Designated Catcher Vessels with Both Trawl and Non-Trawl Gear Designations</b>								
0' - 59'	9	70	54	81	0	19	19	82
60' - 124'	1	71	50	84	18	62	63	92
125' +	0	4	6	6	7	7	7	7
<b>Total</b>	<b>10</b>	<b>145</b>	<b>110</b>	<b>171</b>	<b>25</b>	<b>88</b>	<b>89</b>	<b>181</b>
<b>Designated Catcher Vessels with the Choice between Trawl and Non-Trawl Gear Designations</b>								
0' - 59'	3	4	1	6	0	1	1	7
60' - 124'	0	6	4	8	1	10	10	12
125' +	0	0	1	1	0	2	2	3
<b>Total</b>	<b>3</b>	<b>10</b>	<b>6</b>	<b>15</b>	<b>1</b>	<b>13</b>	<b>13</b>	<b>22</b>
<b>All Designated Catcher Vessels</b>								
<b>Total</b>	<b>1,027</b>	<b>1,294</b>	<b>373</b>	<b>2,150</b>	<b>101</b>	<b>399</b>	<b>407</b>	<b>2,288</b>
<b>Designated Catcher Processors with Non-Trawl Gear Designations</b>								
0' - 59'	3	4	2	4	1	2	2	4
60' - 124'	8	18	11	19	22	22	22	23
125' +	0	9	10	14	27	29	30	30
<b>Total</b>	<b>11</b>	<b>31</b>	<b>23</b>	<b>37</b>	<b>50</b>	<b>53</b>	<b>54</b>	<b>57</b>
<b>Designated Catcher Processors with Trawl Gear Designations</b>								
60' - 124'	0	7	4	7	1	5	5	7
125' +	2	12	15	16	35	35	35	35
<b>Total</b>	<b>2</b>	<b>19</b>	<b>19</b>	<b>23</b>	<b>36</b>	<b>40</b>	<b>40</b>	<b>42</b>
<b>Designated Catcher Processors with Both Trawl and Non-Trawl Gear Designations</b>								
60' - 124'	3	7	5	7	7	11	11	11
125' +	1	11	12	15	33	33	33	33
<b>Total</b>	<b>4</b>	<b>18</b>	<b>17</b>	<b>22</b>	<b>40</b>	<b>44</b>	<b>44</b>	<b>44</b>
<b>Designated Catcher Processors with the Choice between Trawl and Non-Trawl Gear Designations</b>								
60' - 124'	0	1	0	1	0	0	0	1
125' +	0	0	2	2	3	2	3	3
<b>Total</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>All Catcher Processors</b>								
<b>Total</b>	<b>17</b>	<b>69</b>	<b>61</b>	<b>85</b>	<b>129</b>	<b>139</b>	<b>141</b>	<b>147</b>
<b>Designated Catcher Vessels and Catcher Processors Combined</b>								
<b>Total</b>	<b>1,044</b>	<b>1,363</b>	<b>434</b>	<b>2,235</b>	<b>230</b>	<b>538</b>	<b>548</b>	<b>2,435</b>

Tables 90 - 92 provide additional details about the gears used in recent years on vessels that qualify for groundfish licenses. In terms of the assignment of gear designations, recent participation affects only those vessels that used a different gear during the period between June 18, 1995 and February 7, 1998 than was used in the original qualifying period. Tables 90 - 92 however, provide recent gear use information for all qualifying vessels. The tables are useful in that they allow the reader to determine the diversity of gears and their usage by vessels that are projected to receive non-trawl gear designations. The tables also provide an indication of the level of recent non-participation by vessels that are projected to receive groundfish licenses.

Table 90 summarizes the gears used in recent years by vessels that qualify for licenses in the GOA and BSAI, and in the Groundfish LLP as a whole. Table 91 provides additional details for the Eastern Gulf, Central Gulf, and Western Gulf endorsement areas. Table 92 provides additional details for the Aleutian Islands and Bering Sea endorsement areas.

Tables 90 - 92 are formatted similarly to Table 89 with the addition of five columns in FMP area and endorsement subarea showing gears used in recent years by the qualifying vessel. The recent participation gear columns are defined as follows:

1. **DNP** shows the number of qualifying vessels that did not participate between 6/18/95 and 2/7/98
2. **H&L** shows the qualifying vessels that used hook and line gear between 6/18/95 and 2/7/98
3. **Jig** shows the number of qualifying vessels that used jig gear between 6/18/95 and 2/7/98
4. **Trw.** shows the number of qualifying vessels that used trawl gear between 6/18/95 and 2/7/98
5. **Lic's** shows the number of unique vessels that are projected to qualify for licenses

**Table 90: LLP Designations, Endorsements and Gears Used 6/18/95 and 2/7/98**

Vessel Length	Gulf of Alaska						Bering Sea and Aleutian Islands						Groundfish License Limitation Program						
	DNP	H&L	Jig	Pot	Trw.	Lic's	DNP	H&L	Jig	Pot	Trw.	Lic's	DNP	H&L	Jig	Pot	Trw.	Lic's	
<b>Designated Catcher Vessels with Non-Trawl Gear Designations</b>																			
0' - 59'	584	1,094	186	96	0	1,740	18	63	35	11	0	98	591	1,105	205	99	0	1,770	
60' - 124'	19	114	2	55	0	152	11	53	1	68	0	116	25	118	2	101	0	205	
125' +	0	2	0	6	0	6	3	2	0	24	0	27	3	2	0	25	0	28	
<b>Total</b>	<b>603</b>	<b>1,210</b>	<b>188</b>	<b>157</b>	<b>0</b>	<b>1,898</b>	<b>32</b>	<b>118</b>	<b>36</b>	<b>103</b>	<b>0</b>	<b>241</b>	<b>619</b>	<b>1,225</b>	<b>207</b>	<b>225</b>	<b>0</b>	<b>2,003</b>	
<b>Designated Catcher Vessels with Trawl Gear Designations</b>																			
0' - 59'	10	0	0	0	4	14	6	0	0	0	2	8	16	0	0	0	0	5	21
60' - 124'	4	0	0	0	31	35	3	0	0	0	34	37	6	0	0	0	0	36	42
125' +	0	0	0	0	17	17	0	0	0	0	19	19	0	0	0	0	0	19	19
<b>Total</b>	<b>14</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>52</b>	<b>66</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>55</b>	<b>64</b>	<b>22</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>60</b>	<b>82</b>
<b>Designated Catcher Vessels with Both Trawl and Non-Trawl Gear Designations</b>																			
0' - 59'	3	50	12	39	54	81	1	10	3	11	11	19	3	51	12	40	54	82	
60' - 124'	7	40	1	21	61	84	5	18	0	14	46	63	7	40	1	23	68	92	
125' +	0	0	0	0	6	6	0	0	0	1	7	7	0	0	0	1	7	7	
<b>Total</b>	<b>10</b>	<b>90</b>	<b>13</b>	<b>60</b>	<b>121</b>	<b>171</b>	<b>6</b>	<b>28</b>	<b>3</b>	<b>26</b>	<b>64</b>	<b>89</b>	<b>10</b>	<b>91</b>	<b>13</b>	<b>64</b>	<b>129</b>	<b>181</b>	
<b>Designated Catcher Vessels with the Choice between Trawl and Non-Trawl Gear Designations</b>																			
0' - 59'	0	5	0	2	6	6	0	1	1	0	0	1	0	6	1	2	6	7	
60' - 124'	0	2	0	5	8	8	0	2	0	9	8	10	0	3	0	9	10	12	
125' +	0	0	0	1	1	1	0	0	0	2	2	2	0	0	0	3	3	3	
<b>Total</b>	<b>0</b>	<b>7</b>	<b>0</b>	<b>8</b>	<b>15</b>	<b>15</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>11</b>	<b>10</b>	<b>13</b>	<b>0</b>	<b>9</b>	<b>1</b>	<b>14</b>	<b>19</b>	<b>22</b>	
<b>All Designated Catcher Vessels</b>																			
<b>Total</b>	<b>627</b>	<b>1,307</b>	<b>201</b>	<b>225</b>	<b>188</b>	<b>2,150</b>	<b>47</b>	<b>149</b>	<b>40</b>	<b>140</b>	<b>129</b>	<b>407</b>	<b>651</b>	<b>1,325</b>	<b>221</b>	<b>303</b>	<b>208</b>	<b>2,288</b>	
<b>Designated Catcher Processors with Non-Trawl Gear Designations</b>																			
0' - 59'	0	4	1	0	0	4	0	2	1	0	0	2	0	4	1	0	0	4	
60' - 124'	1	17	1	2	0	19	3	18	1	2	0	22	3	19	1	3	0	23	
125' +	1	13	0	4	0	14	12	17	0	6	0	30	12	17	0	6	0	30	
<b>Total</b>	<b>2</b>	<b>34</b>	<b>2</b>	<b>6</b>	<b>0</b>	<b>37</b>	<b>15</b>	<b>37</b>	<b>2</b>	<b>8</b>	<b>0</b>	<b>54</b>	<b>15</b>	<b>40</b>	<b>2</b>	<b>9</b>	<b>0</b>	<b>57</b>	
<b>Designated Catcher Processors with Trawl Gear Designations</b>																			
60' - 124'	0	0	0	0	7	7	0	0	0	0	5	5	0	0	0	0	0	7	7
125' +	1	0	0	0	15	16	1	0	0	0	34	35	1	0	0	0	0	34	35
<b>Total</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>22</b>	<b>23</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>39</b>	<b>40</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>41</b>	<b>42</b>
<b>Designated Catcher Processors with Both Trawl and Non-Trawl Gear Designations</b>																			
60' - 124'	0	6	0	2	3	7	2	7	1	2	4	11	2	7	1	2	4	11	
125' +	0	4	0	1	11	15	2	9	0	2	24	33	2	9	0	2	24	33	
<b>Total</b>	<b>0</b>	<b>10</b>	<b>0</b>	<b>3</b>	<b>14</b>	<b>22</b>	<b>4</b>	<b>16</b>	<b>1</b>	<b>4</b>	<b>28</b>	<b>44</b>	<b>4</b>	<b>16</b>	<b>1</b>	<b>4</b>	<b>28</b>	<b>44</b>	
<b>Designated Catcher Processors with the Choice between Trawl and Non-Trawl Gear Designations</b>																			
60' - 124'	0	0	1	0	1	1	0	0	0	0	0	0	0	0	1	0	1	1	
125' +	0	1	0	1	2	2	0	1	0	1	3	3	0	1	0	1	3	3	
<b>Total</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>4</b>	<b>4</b>		
<b>All Catcher Processors</b>																			
<b>Total</b>	<b>3</b>	<b>45</b>	<b>3</b>	<b>10</b>	<b>39</b>	<b>85</b>	<b>20</b>	<b>54</b>	<b>3</b>	<b>13</b>	<b>70</b>	<b>141</b>	<b>20</b>	<b>57</b>	<b>4</b>	<b>14</b>	<b>73</b>	<b>147</b>	
<b>Designated Catcher Vessels and Catcher Processors Combined</b>																			
<b>Total</b>	<b>630</b>	<b>1,352</b>	<b>204</b>	<b>235</b>	<b>227</b>	<b>2,235</b>	<b>67</b>	<b>203</b>	<b>43</b>	<b>153</b>	<b>199</b>	<b>548</b>	<b>671</b>	<b>1,382</b>	<b>225</b>	<b>317</b>	<b>281</b>	<b>2,435</b>	

Table 91: GOA Designations, Endorsements and Gears Used between 6/18/95 and 2/7/98

Vessel Length	Eastern Gulf						Central Gulf						Western Gulf					
	DNP	H&L Jig	Pot	Trw.	Lic's		DNP	H&L Jig	Pot	Trw.	Lic's		DNP	H&L Jig	Pot	Trw.	Lic's	
<b>Designated Catcher Vessels with Non-Trawl Gear Designations</b>																		
0' - 59'	312	636	74	9	0	975	297	654	120	80	0	981	22	85	26	26	0	122
60' - 124'	3	36	0	2	0	39	13	99	1	40	0	120	8	53	1	24	0	73
125' +	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	6	0	6
<b>Total</b>	<b>315</b>	<b>672</b>	<b>74</b>	<b>11</b>	<b>0</b>	<b>1,014</b>	<b>310</b>	<b>753</b>	<b>121</b>	<b>120</b>	<b>0</b>	<b>1,101</b>	<b>30</b>	<b>140</b>	<b>27</b>	<b>56</b>	<b>0</b>	<b>261</b>
<b>Designated Catcher Vessels with Trawl Gear Designations</b>																		
0' - 59'	0	0	0	0	0	0	5	0	0	0	4	9	6	0	0	0	4	10
60' - 124'	0	0	0	0	0	0	3	0	0	0	20	23	2	0	0	0	27	29
125' +	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	17	17
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>38</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>48</b>	<b>56</b>
<b>Designated Catcher Vessels with Both Trawl and Non-Trawl Gear Designations</b>																		
0' - 59'	0	6	1	1	5	9	2	42	9	32	52	70	2	27	7	31	42	54
60' - 124'	0	1	0	0	0	1	5	40	1	17	52	71	5	14	0	16	37	50
125' +	0	0	0	0	0	0	0	0	0	0	4	4	0	0	0	0	6	6
<b>Total</b>	<b>0</b>	<b>7</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>10</b>	<b>7</b>	<b>82</b>	<b>10</b>	<b>49</b>	<b>108</b>	<b>145</b>	<b>7</b>	<b>41</b>	<b>7</b>	<b>47</b>	<b>85</b>	<b>110</b>
<b>Designated Catcher Vessels with the Choice between Trawl and Non-Trawl Gear Designations</b>																		
0' - 59'	0	2	0	0	3	3	0	4	0	2	4	4	0	1	0	1	1	1
60' - 124'	0	0	0	0	0	0	0	2	0	3	6	6	0	0	0	4	4	4
125' +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1
<b>Total</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>5</b>	<b>10</b>	<b>10</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>6</b>	<b>6</b>	<b>6</b>
<b>All Designated Catcher Vessels</b>																		
<b>Total</b>	<b>315</b>	<b>681</b>	<b>75</b>	<b>12</b>	<b>8</b>	<b>1,027</b>	<b>325</b>	<b>841</b>	<b>131</b>	<b>174</b>	<b>148</b>	<b>1,294</b>	<b>45</b>	<b>182</b>	<b>34</b>	<b>109</b>	<b>139</b>	<b>373</b>
<b>Designated Catcher Processors with Non-Trawl Gear Designations</b>																		
0' - 59'	0	3	1	0	0	3	0	4	1	0	0	4	0	2	1	0	0	2
60' - 124'	0	8	0	0	0	8	1	17	1	1	0	18	0	10	1	1	0	11
125' +	0	0	0	0	0	0	0	9	0	1	0	9	1	9	0	4	0	10
<b>Total</b>	<b>0</b>	<b>11</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>1</b>	<b>30</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>31</b>	<b>1</b>	<b>21</b>	<b>2</b>	<b>5</b>	<b>0</b>	<b>23</b>
<b>Designated Catcher Processors with Trawl Gear Designations</b>																		
60' - 124'	0	0	0	0	0	0	0	0	0	0	7	7	0	0	0	0	4	4
125' +	0	0	0	0	2	2	1	0	0	0	11	12	0	0	0	0	15	15
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>18</b>	<b>19</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>19</b>	<b>19</b>
<b>Designated Catcher Processors with Both Trawl and Non-Trawl Gear Designations</b>																		
60' - 124'	0	3	0	0	0	3	0	6	0	2	3	7	0	5	0	2	2	5
125' +	0	0	0	0	1	1	0	3	0	1	8	11	0	3	0	1	9	12
<b>Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>9</b>	<b>0</b>	<b>3</b>	<b>11</b>	<b>18</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>3</b>	<b>11</b>	<b>17</b>
<b>Designated Catcher Processors with the Choice between Trawl and Non-Trawl Gear Designations</b>																		
60' - 124'	0	0	0	0	0	0	0	0	1	0	1	1	0	0	0	0	0	0
125' +	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	2	2
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>All Catcher Processors</b>																		
<b>Total</b>	<b>0</b>	<b>14</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>17</b>	<b>2</b>	<b>39</b>	<b>3</b>	<b>5</b>	<b>30</b>	<b>69</b>	<b>1</b>	<b>30</b>	<b>2</b>	<b>9</b>	<b>32</b>	<b>61</b>
<b>Designated Catcher Vessels and Catcher Processors Combined</b>																		
<b>Total</b>	<b>315</b>	<b>695</b>	<b>76</b>	<b>12</b>	<b>11</b>	<b>1,044</b>	<b>327</b>	<b>880</b>	<b>134</b>	<b>179</b>	<b>178</b>	<b>1,363</b>	<b>46</b>	<b>212</b>	<b>36</b>	<b>118</b>	<b>171</b>	<b>434</b>

Table 92: BSAI Designations, Endorsements and Gears Used between 6/18/95 and 2/7/98

Vessel Length	Aleutian Islands						Bering Sea					
	DNP	H&L	Jig	Pot	Trw.	Lic's	DNP	H&L	Jig	Pot	Trw.	Lic's
<b>Designated Catcher Vessels with Non-Trawl Gear Designations</b>												
0' - 59'	1	13	0	0	0	14	18	63	35	11	0	98
60' - 124'	4	30	0	4	0	36	10	48	1	67	0	110
125' +	0	0	0	1	0	1	3	2	0	23	0	26
<b>Total</b>	<b>5</b>	<b>43</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>51</b>	<b>31</b>	<b>113</b>	<b>36</b>	<b>101</b>	<b>0</b>	<b>234</b>
<b>Designated Catcher Vessels with Trawl Gear Designations</b>												
0' - 59'	0	0	0	0	0	0	6	0	0	0	2	8
60' - 124'	1	0	0	0	7	8	3	0	0	0	34	37
125' +	0	0	0	0	16	16	0	0	0	0	19	19
<b>Total</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>24</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>55</b>	<b>64</b>
<b>Designated Catcher Vessels with Both Trawl and Non-Trawl Gear Designations</b>												
0' - 59'	0	0	0	0	0	0	1	10	3	11	11	19
60' - 124'	0	6	0	3	13	18	5	17	0	14	46	62
125' +	0	0	0	1	7	7	0	0	0	1	7	7
<b>Total</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>4</b>	<b>20</b>	<b>25</b>	<b>6</b>	<b>27</b>	<b>3</b>	<b>26</b>	<b>64</b>	<b>88</b>
<b>Designated Catcher Vessels with the Choice between Trawl and Non-Trawl Gear Designations</b>												
0' - 59'	0	0	0	0	0	0	0	1	1	0	0	1
60' - 124'	0	0	0	1	1	1	0	2	0	9	8	10
125' +	0	0	0	0	0	0	0	0	0	2	2	2
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>11</b>	<b>10</b>	<b>13</b>
<b>All Designated Catcher Vessels</b>												
<b>Total</b>	<b>6</b>	<b>49</b>	<b>0</b>	<b>10</b>	<b>44</b>	<b>101</b>	<b>46</b>	<b>143</b>	<b>40</b>	<b>138</b>	<b>129</b>	<b>399</b>
<b>Designated Catcher Processors with Non-Trawl Gear Designations</b>												
0' - 59'	0	1	0	0	0	1	0	2	1	0	0	2
60' - 124'	3	18	1	2	0	22	3	18	1	2	0	22
125' +	11	16	0	5	0	27	11	17	0	6	0	29
<b>Total</b>	<b>14</b>	<b>35</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>50</b>	<b>14</b>	<b>37</b>	<b>2</b>	<b>8</b>	<b>0</b>	<b>53</b>
<b>Designated Catcher Processors with Trawl Gear Designations</b>												
60' - 124'	0	0	0	0	1	1	0	0	0	0	5	5
125' +	1	0	0	0	34	35	1	0	0	0	34	35
<b>Total</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>36</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>39</b>	<b>40</b>
<b>Designated Catcher Processors with Both Trawl and Non-Trawl Gear Designations</b>												
60' - 124'	0	7	0	2	2	7	2	7	1	2	4	11
125' +	2	9	0	2	24	33	2	9	0	2	24	33
<b>Total</b>	<b>2</b>	<b>16</b>	<b>0</b>	<b>4</b>	<b>26</b>	<b>40</b>	<b>4</b>	<b>16</b>	<b>1</b>	<b>4</b>	<b>28</b>	<b>44</b>
<b>Designated Catcher Processors with the Choice between Trawl and Non-Trawl Gear Designations</b>												
60' - 124'	0	0	0	0	0	0	0	0	0	0	0	0
125' +	0	1	0	1	3	3	0	1	0	1	2	2
<b>Total</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>All Catcher Processors</b>												
<b>Total</b>	<b>17</b>	<b>52</b>	<b>1</b>	<b>12</b>	<b>64</b>	<b>129</b>	<b>19</b>	<b>54</b>	<b>3</b>	<b>13</b>	<b>69</b>	<b>139</b>
<b>Designated Catcher Vessels and Catcher Processors Combined</b>												
<b>Total</b>	<b>23</b>	<b>101</b>	<b>1</b>	<b>22</b>	<b>108</b>	<b>230</b>	<b>65</b>	<b>197</b>	<b>43</b>	<b>151</b>	<b>198</b>	<b>538</b>



RECEIVED

APR - 9 1999

N.P.F.M.C

April 9, 1999

Mr. Richard B. Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4th Avenue  
Anchorage, AK 99501

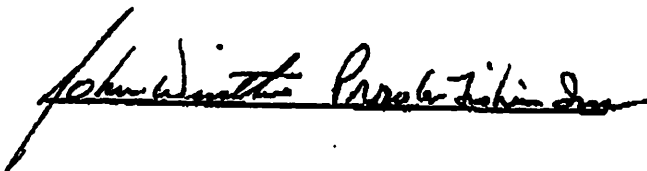
RE: BSAI Fixed Gear Cod Split, LLP Species Endorsements for  
BSAI Longline Cod Vessels

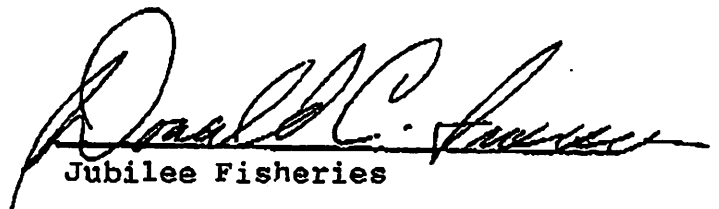
Dear Chairman Lauber:


The undersigned fixed gear representatives request that the Council adopt the attached proposal for analysis. The proposal consists of two separate amendments. The first would split BSAI cod TAC among the different fixed gear sectors, according to recent historic catch (harvest of rollovers not included). No reallocation among fixed gear operators is contemplated. No change in the Council's 51%/49%/2% split of BSAI cod is intended. It is hoped that this amendment will be implemented early in F/Y 2000.

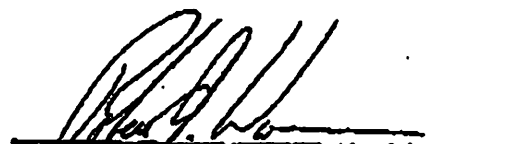
The second amendment would provide for LLP species endorsements for BSAI freezer-longline and longline cod vessels, based on historic catches. Only those vessels that meet the minimum historic catch level selected by the Council will receive species endorsements. It is understood that because of the more elaborate analysis required, this amendment will be implemented later in F/Y 2000.

Sincerely,

  
John W. Little  
CLIPPER SEAFOODS

  
Donald C. Jensen  
Jubilee Fisheries

  
DAVID LITTLE  
CLIPPER SEAFOODS

  
ALASKA LEADER FISHERIES

Mr. Richard B. Lauber, Chariman  
April 9, 1999  
Page 2

GLACIER FISH COMPANY

BY: J. Brandy

William C. Arlunni  
ALASKA FRONTIER CO.

Maury [unclear]

GULF MUST, INC.

[Signature]

F/V BLUE NORTH AND BLUE PACIFIC

Takujin Kono

DEEP PACIFIC FISHING COMPANY

[Signature]  
STAR OFFSHORE

[Signature]

ALAN FORNEY, REGAL FISH LTD

Ronald [unclear]

FISHING Co. of ALASKA

Charles Horner  
Baranof/Courages

F/V NORTHERN MARORA  
F. [unclear]

Rudya Petersen  
F/V Pathfinder, F/V U.S. Liberator

**PROPOSED BSAI FIXED GEAR COD SPLIT****A. BSAI COD TAC**

Allocation among fixed and mobile gear remains the same - 51% fixed gear, 47% trawl gear, 2% jig gear.

**B. BSAI FIXED GEAR COD ALLOCATION**

To be apportioned between freezer-longliners, longliners, and pot vessels according to recent catch histories.

Recent catch histories to be determined as a percentage of cumulative catches of the fixed gear apportionment of BSAI cod TAC by gear type for

1. 1996, 1997, 1998;
2. 1997, 1998;\* or
3. 1998

Harvest of trawl and jig rollovers not included.

**C. FUTURE COD ROLLOVERS**

Future trawl and jig rollovers to the fixed gear sectors (if any) will be apportioned according to historic catch of rollovers, for whichever year or series of years is chosen under (B), above.

\*51/47/2 split became effective in 1997.

**LLP SPECIES ENDORSEMENTS, BSAI LONGLINE COD FLEET****A. FIXED GEAR LICENSES, LLP**

Initial LLP licenses for F/Y 2000 will be interim licenses. A trailing LLP amendment will provide for separate licenses with cod species endorsements to be issued to freezer-longliners and longliners fishing for cod in the BSAI.

**B. COD SPECIES ENDORSEMENTS, LLP LANDING REQUIREMENTS**

**Freezer-Longliners** - For purposes of analysis, minimum catches of 200, 300, 500 mt in 1996, 1997 or 1998. Species endorsements to those who qualify, only.

**Longliners** - For purposes of analysis, minimum catches of 7.5, 15, and 25 mt in 1996, 1997 or 1998. Species endorsements to those who qualify, only.

# United Fishermen's Marketing Association, Inc.

P.O. Box 1035 Kodiak, Alaska 99615

Telephone 486-7553

AGENDA D-1(f)  
APRIL 1999  
Supplemental



Mr. Richard Lauber, Chairman  
North Pacific Fishery Management Council  
Anchorage, AK

RECEIVED April 7, 1999  
APR 12 1999  
N.P.F.M.C.

Dear Chairman Lauber,

The April, 1999, Council Agenda includes Council consideration of the possible rationalization of the BSAI fixed gear p. cod TAC under D-1 (4) ("Allocation of BSAI Pacific cod between freezer longliners and other fixed gear: Council direction").

## I. General Background

The issue of a potential reallocation of the BSAI p. cod fixed gear TAC among and between the fixed gear components of the fixed gear sector has been advanced by representatives of the freezer longline fleet. Please note that we did not advance this issue, and we do not endorse it.

We are opposed to the proposed reallocation because it creates consequences that harm, and cause economic destabilization and disruption to the pot fleet.

We request that the Council not try to solve a problem by creating another problem. We respectfully request that the Council develop a recent participation requirement (i.e., gear-type-species endorsement/recent participation requirement) for the pot fleet as an integral and inseparable component of any Analysis/FMP Amendment that is voted on by the Council for submission to the Secretary of Commerce on this issue. We are opposed to the concept of a "Trailing Amendment" that addresses the needs of the pot fleet after the proposed reallocation is advanced to the Secretary. We respectfully request that the Council recommend that the Secretary implement a recent participation requirement for the pot fleet at the same time that he may implement the proposed reallocation. We would rather see nothing, than see only the proposed reallocation submitted to the Secretary.

The pot component of this fishery will gain no benefit toward rationalization or stability from an initiative that addresses only the simple reallocation among the fixed gear components. The proposed reallocation overwhelmingly favors the freezer longline fleet at the expense of the pot fleet, and only selectively provides for the economic interests of the freezer longline component of this fishery.

It is anticipated that the proposed reallocation will set up circumstances that destabilize and derationalize the pot gear component of this fishery. Addressing only the proposed fixed-gear reallocation will simply assign a percentage of the BSAI p. cod fixed gear TAC to each of the respective fixed gear components, and not impose a limit on the number of vessels who may participate in this fishery. For example, in any one year, the BSAI p. cod pot fishery has been characterized by participation from a relatively limited number of pot vessels. We presume that the historical production record that has been earned by this small set of pot vessels partially establishes the basis upon which the Council may develop a formula to reallocate a percentage of the BSAI p. cod fixed gear TAC to the pot-gear component. We propose that it logically follows that the Council should also limit access to such p. cod pot gear TAC to some subset of those vessels that were responsible for establishing the historical basis of any reallocation of the pot-gear p. cod TAC. Absent a recent participation requirement, more than 300 vessels may be LLP-qualified to participate in the harvest of any p. cod pot gear TAC that results from the proposed reallocation, thus causing a disruption, derationalization and destabilization of the economic viability of the pot-gear component of this fishery.

**II. Bycatch considerations in any formula for the reallocation of the BSAI p. cod fixed gear TAC**

We believe that the Council should consider an allocation to the pot gear component that exceeds the historical percentage that has been demonstrated by that component; that is, an increment over the percentage allocation that may otherwise be calculated and based on historical performance. Pot gear has diminished bycatch and discards. We ask the Council to analyze the comparative performance of the hook-and-line sector and the pot sector respectively with regard to the bycatch and mortality of halibut and other marine species.

**III. Other economic impacts and considerations**

The proposed reallocation of the BSAI p. cod fixed gear TAC among the fixed gear components of this fishery has significant economic consequences and impacts, costs and benefits with regard to employment, shore based communities, shore-based processing entities, support industries, etc. Under 679.20(a)(7), 51 percent of the BSAI p. cod TAC is currently allocated to the fixed gear sector of this fishery (i.e., hook-and-line, and pot gear). During 1995 through 1998, approximately 510,000 metric tons of p. cod was harvested as a result of this allocation to the fixed gear sector; approximately 89,000 metric tons was harvested by the pot component of this sector. These are significant amounts of product, and the proposed reallocation of this resource has significant economic consequences. Nearly the entire fleet of pot-gear vessels that harvest BSAI p. cod are catcher-vessels that base their operations on shore. The preponderant quantity of p. cod that is harvested by the pot fleet is delivered to shore-based processing entities. The proposed reallocation of BSAI p. cod will have consequences to the commerce and economic activity that surround this fishery.

We ask the Council to consider that the TAC for BSAI p. cod has varied from 270,000 mt to 177,000 mt in the past 6 years; the economic consequences that derive from the productivity trends of the BSAI p. cod resource should be considered in the discussion of the proposed reallocation.

We believe that the economic consequences, costs and benefits that may result from the proposed reallocation should be carefully and thoughtfully measured and considered by the Council.

**IV. Treatment of the Reallocation (i.e., rollover) of the BSAI p. cod trawl and jig TAC**

We recommend that the Council compute the respective historical harvest record of the hook-and-line and pot-gear components on a percentage basis using the BSAI p. cod fixed gear TAC as established in the final harvest specifications. The percentages should be calculated using the respective historical harvests of the BSAI p. cod fixed gear TAC, and not using the respective historical harvests of the combined TAC and rollovers. Harvests of rollovers from the trawl and jig sectors should not be used to calculate the harvest percentages of the BSAI p. cod fixed gear harvest. Rollovers are traditionally released during a time in the Fall when the pot fleet is generally unable to access this p. cod.

We recommend that any future rollover that may occur under any future regime in which the proposed reallocation of p. cod is operative will be allocated according to the same formula that is applied to the overall allocation of the BSAI p. cod fixed gear TAC between the hook-and-line fleet and the pot fleet.

**V. Alternatives and other issues for consideration**

We ask the Council to substitute an alternative to the proposed reallocation of the BSAI p. cod fixed gear TAC. The alternative solution would institute a recent participation requirement within LLP for the

combined set of all pot-gear and hook-and-line vessels of the BSAI p. cod fixed gear sector. This alternative is meant to substitute for the proposed reallocation, and would limit participation in the fixed gear sector to those fixed-gear vessels that meet some set of recent participation requirements.

A vessel that is LLP-qualified to operate as a hook-and-line vessel and as a pot-gear vessel should be required to make a one-time-choice of the gear-type that is utilized for the harvest of BSAI p. cod.

Establish a process for the distribution of any future reallocation of BSAI p. cod from the BSAI p. cod trawl sector to the fixed gear sector; that is, for any change in the current 51%/47%/2% allocation.

Consider product quality and size-selectivity issues.

Analyze the foreign ownership interest in the hook-and-line catcher-processor fleet.

Permit the retention of BSAI p. cod that is harvested for crab bait by crab vessels.

Permit the retention of BSAI p. cod that is harvested during the halibut and sablefish IFQ fisheries.

Establish a process to reallocate BSAI p. cod to the pot component if the hook-and-line component is restricted by the Marine Mammal Protection Act, the Endangered Species Act or bycatch regulations.

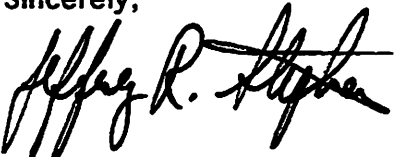
#### VI. Summary

Two letters from 4 U.S. Senators address the impacts of AFA; the Senators encourage that "... steps are necessary to prevent fishermen from redirecting their efforts toward-and further overcapitalizing-fisheries in which they have little participation. . ." The Senators raised salient points with regard to "... the need to prevent major dislocations and redirection of effort . . ." The proposed reallocation will simply establish a separate TAC cap of BSAI p. cod for each of the fixed gear components, which, by itself, will cause further dislocations and redirection of effort with no attention to rationalization, or to the number of participants who may participate in these fisheries.

An outcome that simply addresses only the reallocation of the BSAI p. cod fixed gear TAC among and between the fixed-gear participants of this fishery is incomplete, will not address fundamental and essential issues, and serves to destabilize the pot component of this fishery. Further, the proposed reallocation is not justified if it is designed principally to serve the desire of the freezer longline fleet to organize a cooperative, and not to comprehensively address the greater rationalization issues.

If a responsible and comprehensive approach to this issue results in the implementation of a solution in 2001, rather than in 2000, we believe that the delay in implementation is justified; we encourage the Council to address this issue in a thorough, deliberative and thoughtful manner.

Sincerely,



Jeffrey R. Stephan

# United Fishermen's Marketing Association, Inc.

P.O. Box 1035 Kodiak, Alaska 99615

Telephone 486-3453

Mr. Richard Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4th Ave., Suite 306  
Anchorage, AK 99501-2252

RECEIVED April 7, 1999

APR 12 1999

Dear Chairman Lauber,

N.P.F.M.C

The April, 1999, Council Agenda includes Council consideration of the possible rationalization of the BSAI p. cod fixed gear TAC under D-1(d) and D-1(g).

We respectfully request the Council to develop a recent participation requirement (i.e., gear-type-species endorsement/recent participation requirement) for the pot fleet as an integral and inseparable component of any Analysis/FMP Amendment that is voted on by the Council for submission to the Secretary of Commerce on this issue.

We believe that any initiative that simply addresses only the reallocation of the BSAI p. cod fixed gear TAC among and between the fixed-gear participants in this fishery is incomplete, will not address fundamental and essential issues, and serves to destabilize the pot component of this fishery. Further, the proposed reallocation is not justified if it is designed principally to serve the desire of the freezer longline fleet to organize a cooperative, and not to comprehensively address the greater rationalization issues.

We ask the Council to include the following topics in any Analysis/FMP Amendment that addresses the rationalization of the BSAI p. cod fixed gear sector:

I. Historical participation of vessels that delivered p. cod from the BSAI p. cod fixed gear TAC:

A. Total number of unique hook-and-line vessels

1. by hook-and-line catcher vessel
2. by hook-and-line catcher/processor
3. during '95, '96, '97 and '98 collectively
4. during '95, '96, and '97 collectively
5. during '96, '97, and '98 collectively
6. during '95 and '96 collectively
7. during '96 and '97 collectively
8. during '97 and '98 collectively
9. during '95, '96, '97 and '98 respectively
10. by the following vessel-length categories:
  - a. < 60 ft
  - b. ≥ 60 ft and < 125 ft
  - c. ≥ 125 ft



**B. Total number of unique pot vessels**

1. by pot catcher vessel
2. by pot catcher/processor
3. during '95, '96, '97 and '98 collectively
4. during '95, '96, and '97 collectively
5. during '96, '97, and '98 collectively
6. during '95 and '96 collectively
7. during '96 and '97 collectively
8. during '97 and '98 collectively
9. during '95, '96, '97 and '98 respectively
10. by the following vessel-length categories:
  - a. < 60 ft
  - b.  $\geq 60$  ft and < 125 ft
  - c.  $\geq 125$  ft

**II. The number of unique vessels that are LLP-qualified to harvest p. cod from the BSAI p. cod fixed gear TAC. LLP-qualifications for vessels should be analyzed from the standpoint of those LLP-qualifications that are 1) now in effect, and that 2) may be in effect if the Secretary approves the October, 1998, Council actions with regard to LLP:**

**A. Total number of unique vessels that are LLP-qualified to operate**

1. as hook-and-line catcher vessels
2. as hook-and-line catcher/processors
3. as pot-gear catcher vessels
4. as pot-gear catcher/processors

**B. Information provided in II A above should be grouped by the following vessel-length categories:**

1. < 60 ft
2.  $\geq 60$  ft and < 125 ft
3.  $\geq 125$  ft

**C. Information provided in II A above should be grouped by LLP qualification for the following area and gear-type designations:**

1. BSAI and GOA trawl and non-trawl combined
2. BSAI and GOA trawl
3. BSAI and GOA non-trawl
4. BSAI only trawl and non-trawl combined
5. BSAI only trawl
6. BSAI only non-trawl

III. The addition of a recent participation requirement to LLP (i.e., gear-type-species endorsement, recent participation requirement) for the pot component of the BSAI p. cod fixed gear sector that limits participation in the pot component to those vessels that meet some combination of the following requirements:

A. qualification years:

1. any 3 years of 1995, 1996, 1997 and 1998
2. any 2 years of 1995, 1996, 1997 and 1998
3. any 2 years of 1995, 1996 and 1997
4. any 2 years of 1996, 1997 and 1998

B. qualification landings:

1. minimum number of deliveries
2. minimum number of pounds

IV. Substitute an alternative to the proposed reallocation of the BSAI p. cod fixed gear TAC. The alternative solution would institute a recent participation requirement within LLP for the combined set of all pot-gear and hook-and-line vessels of the BSAI p. cod fixed gear sector. This alternative is meant to substitute for the proposed reallocation, and would limit participation in the fixed gear sector to those fixed-gear vessels that meet one of the following sets of qualification years:

A. For pot vessels

1. any 3 years of 1995, 1996, 1997 and 1998
2. any 2 years of 1995, 1996, 1997 and 1998
3. any 2 years of 1995, 1996 and 1997
4. any 2 years of 1996, 1997 and 1998

B. For hook-and-line vessels

1. options to be suggested by the hook-and-line fleet

V. Require a fixed gear vessel to make a one-time-choice under LLP to utilize either pot-gear or hook-and-line gear for the harvest of BSAI p. cod. This would establish a gear-type-species endorsement within LLP for the BSAI p. cod fixed gear sector.

A. retain the ability to utilize both hook-and line gear and pot gear under LLP for the harvest of the BSAI p. cod fixed gear TAC.

B. one-time choice under LLP to utilize either pot-gear or hook-and-line gear for the harvest of the BSAI p. cod fixed gear TAC.

VI. Calculate the respective historical harvest record of the hook-and-line and pot-gear components on a percentage basis using the BSAI p. cod fixed gear TAC as established in the final harvest specifications. The percentages should be calculated using the respective historical harvests of the BSAI p. cod fixed gear TAC, and not using the respective historical harvests of the combined TAC and rollovers.

- A. for 1995, 1996, 1997 and 1998 respectively
- B. by hook-and-line component

C. by pot-gear component

VII. Allocate any future rollover from the trawl and jig sectors that may occur under any future regime in which the proposed reallocation of p. cod is operative according to the same formula that is applied to the overall allocation of the BSAI p. cod fixed gear TAC between the hook-and-line and the pot fleet.

VIII. Establish a process for the distribution of any future reallocation of BSAI p. cod from the BSAI p. cod trawl sector to the fixed gear sector; that is, for any change in the current 51%/47%/2% allocation.

IX. Analyze and measure the economic consequences, impacts, costs, and benefits of the proposed reallocation of the BSAI p. cod fixed gear allocation between the hook-and-line and pot components of this fishery:

- A. employment impacts
- B. impacts to shore-based communities
- C. impacts to shore-based processing entities
- D. impacts to support industry
- E. the economic significance of the BSAI p. cod fishery to the pot-gear fleet
- F. the foreign ownership interest in the hook-and-line catcher-processor fleet
- G. economic impacts associated with the productivity trends of the BSAI p. cod resource
- H. comparison of other economic costs and benefits

X. Analyze the comparative and respective performance of the hook-and-line sector and the pot sector with regard to:

- A. halibut bycatch and mortality
- B. other bycatch and mortality

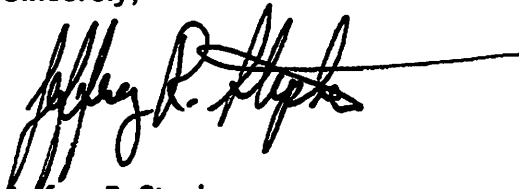
XI. Permit the retention of BSAI p. cod that is harvested for crab bait by crab vessels.

XII. Permit the retention of BSAI p. cod that is harvested during the halibut and sablefish IFQ fisheries.

XIII. Establish a process to reallocate BSAI p. cod to the pot component if the hook-and-line component is restricted by the Marine Mammal Protection Act, the Endangered Species Act or bycatch regulations.

Thank you for your consideration of our thoughts on this subject.

Sincerely,



Jeffrey R. Stephan

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April 11 1999

Richard B. Lauber, Chairman  
North Pacific Fisheries Management Council  
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N.P.F.M.C

Dear Mr. Lauber:

I am an owner/operator of the "Pacific Venture". The "Pacific Venture" is a pot boat that fishes cod and crab in the Bering Sea. With the likelihood of the council initiating some kind of action in the re-allocation of fixed gear cod in the BSAI, I would like to express some concerns.

If the council is to address the re-allocation issue, it is imperative to address Limited License Program at the same time. Both the re-allocation and LLP should be inseparable thus benefiting all gear types. Any action separating or initiating re-allocation without LLP would unduly reward one gear type at the expense of the other.

A LLP based on a historic catch or participation would benefit participants who were responsible for the production numbers used in any re-allocation.

In closing I urge you to consider these issues together.

Respectfully,



Jerry Bongen