

MEMORANDUM

TO: Council, SSC and AP Members
FROM: Chris Oliver *Chris*
Executive Director
DATE: November 22, 2006
SUBJECT: BSAI & GOA Trawl LLP Recency Analysis

ESTIMATED TIME 4 HOURS

ACTION REQUIRED

Progress report on analysis.

BACKGROUND

Staff has been proceeding with analyses of a proposed amendment to address latent capacity by trawl catcher vessels and trawl catcher processor vessels in the BSAI and GOA. In October, the Council reviewed some preliminary data and made several revisions to the alternatives and options. The problem statement, along with revised alternatives and options is attached as Item C-3(a). The presentation at the December meeting will be limited to a brief summary of data analyses completed to date. Additional preliminary data and qualitative analyses of portions of the proposed amendment will be distributed at the meeting.

Staff anticipates initial public review of the Draft Environmental Assessment/Regulatory Impact Review can still be completed for review at the February Council meeting.

BSAI & GOA Trawl LLP Recency Analysis – Draft Problem Statement and Alternatives

DRAFT PROBLEM STATEMENT

The Council's adopted the following draft problem statement on June 11, 2006.

Trawl catcher vessel eligibility is a conflicting problem among the Bering Sea, Gulf of Alaska and Aleutian Islands. In the Bering Sea and Gulf of Alaska, there are too many latent licenses and in the Aleutian Islands there are not enough licenses available for trawl catcher vessels.

In the Bering Sea and GOA, the trawl catcher vessel groundfish fisheries in the BSAI and trawl vessel groundfish fisheries in the GOA are fully utilized. In addition, the existence of latent licenses may exacerbate the disadvantages to GOA dependant CVs resulting from a lack of comprehensive rationalization in the GOA. Competition for these resources is likely to increase as a result of a number of factors, including Council actions to rationalize other fisheries, favorable current market prices and a potential for TAC changes in future years. Trawl vessel owners who have made significant investments, have long catch histories, and are dependent upon BSAI and GOA groundfish resources need protection from others who have little or no recent history and with the ability to increase their participation in the fisheries. This requires prompt action to promote stability in the trawl catcher vessel sector in the BSAI and trawl vessel sector in the GOA until comprehensive rationalization is completed.

In the Aleutian Islands, previous Congressional and Council actions reflect a policy encouraging economic development of Adak. The opportunity for non-AFA CVs to build catch history in the AI was limited until markets developed in Adak. The analysis indicates that there are only six non-AFA CV trawl AI endorsed LLPs. The Congressional action to allocate AI pollock to the Aleut Corporation for the purpose of economic development of Adak requires that 50% of the AI pollock eventually be harvested by <60' vessels. The Council action under Am. 80 to allocate a portion of AI POP and Atka mackerel to the limited access fleet does not modify AFA CV sideboard restrictions, thus participation is effectively limited to non-AFA vessels with AI CV trawl LLP endorsements. A mechanism is needed to help facilitate the development of a resident fishing fleet that can fish in both state and federal waters. The Council will consider different criteria for the CV Eligibility in the AI.

DESCRIPTION OF ALTERNATIVES

The Council has approved a draft set of analysis for analysis of a license-based LLP threshold eligibility program for vessels meeting minimum catch criteria of at least one landing or two landings over a qualification period. LLPs not meeting these minimum catch criteria will have endorsements in the non-qualifying management area removed of all area (BSAI and GOA) or subarea (Bering Sea, Aleutian Island, Western Gulf and Central Gulf) endorsements, depending upon the option selected by the Council. The two main participation periods selected by the Council are 2000-2005 and 1995-2005, although these are modified slightly in Component 5 to allow analysis of 2006 harvests in the Aleutian Islands management area. The analysis covers LLPs held by BSAI trawl catcher vessels and catcher processor vessels as well as LLPs held by both trawl catcher vessels and catcher processors within the GOA. The Council noted a specific request for the analysis to provide the number of LLPs for vessels under 60 feet that would be eliminated under the eligibility criteria, so that option is addressed in Component 1- Option 3.

The Council's draft alternatives for the program are described in the following text and also in Table 1 shown at the end of this section.

Five Unique Alternative Choices:

Alternative 1 – No Action: Under this alternative the existing situation will continue. All LLPs currently issued will continue to be valid for the BSAI and GOA trawl groundfish fisheries. There would also be no change in the number of non-AFA trawl CV LLPs for the Aleutian Islands area, which could occur under Component 5.

Alternatives 2, 3, 4, and 5 are differentiated by two main factors: whether or not the program is implemented at the management area or subarea designation and secondly whether the landings history is based upon trawl groundfish landings or whether total groundfish landings, including the amount harvested by fixed gear, is included in the cumulative catch for the appropriate qualification period. The specification of these two main factors is shown for each respective alternative below:

Alternative 2 would implement LLP threshold criteria based upon BSAI and GOA management areas. It would specify application of all trawl groundfish harvests within these areas for the respective qualification period.

Alternative 3 would implement LLP threshold criteria based upon BSAI and GOA management areas. It would specify application of groundfish harvests (trawl and fixed gear) within these areas for the respective qualification period.

Alternative 4 would implement LLP threshold criteria based upon BS, AI, WG and CG subdistrict management areas. It would specify application of trawl groundfish harvests within these areas for the respective qualification period.

Alternative 5 would implement LLP threshold criteria based upon BS, AI, WG and CG subdistrict management areas. It would specify application of groundfish harvests (trawl and fixed gear) within these areas for the respective qualification period.

Component/Option Choices Common to Each Action Alternative (2-5).

Each of the four action alternatives has a common set of five components that will form the remainder of choices for this amendment. The Council can choose to include and apply any combination from these components to any one of the alternatives identified above. The respective components address the issues of qualification period; landing criterion applied to determine qualified LLPs; multiple LLPs registered to a single vessel; potential exclusion of AFA qualified vessels; potential exclusion of Amendment 80 vessels; and options for separately addressing LLPs in the Aleutian Islands groundfish fishery.

Component 1 includes a number of possible choices for landings criteria to be applied to the current LLP holders for existing trawl LLPs in the respective areas. The varying factors under Component 1 are the choice of qualification period (2000-2005 or 1995-2005); choice of threshold criteria to be applied (at least one landing for the qualification period or at least two landings for the qualification period); and a final choice to exempt vessels with an overall length less than 60 feet from application of the threshold criteria. The choices for Component 1 are as follows:

Component 1 – Option 1 requires at least one landing of groundfish during the qualification period of 2000-2005.

Component 1 – Option 1 - Suboption 1 requires at least one landing of groundfish during the qualification period of 1995-2005.

Component 1 – Option 2 requires at least two landings of groundfish during the qualification period of 2000-2005.

Component 1 – Option 2 – Suboption 1 requires at least two landings of groundfish during the qualification period of 1995-2005.

Component 1 – Option 3 provides a choice to exempt trawl LLPs in the BSAI or GOA assigned to vessels less than 60 feet in overall length from application of the threshold criteria. Selection of this option can be independent of other Component 1 options.

Component 1 – Option 4 provides a choice of whether include non-AFA & non-Amendment 80 BSAI Cp in application of the groundfish threshold landings criteria.

Component 2 provides a set of choices on how to handle the instance where there are multiple LLPs registered to a single vessel, also known as ‘stacking’ of LLPs. The Council has specified one option to deal with this situation as follows:

Component 2 – will fully credit groundfish harvest history to all stacked licenses, each carrying its own qualifying endorsements and designations.

Component 3 provides a choice of whether not to exclude AFA vessels from LLP qualification under the amendment. The Council identified a single option as follows:

Component 3 – Option 1 will exclude LLPs originally issued to vessels qualified under the AFA and LLPs used for eligibility in the AFA.

Component 4 provides a choice of whether not to exclude Amendment 80-qualified vessels from LLP qualification under the amendment. The Council identified a single option as follows:

Component 4 – Option 1 will exclude LLPs originally issued to vessels qualified under Amendment 80 and LLPs used for eligibility in Amendment 80.

Component 5 is different from other parts of the proposed amendment, in that it evaluates the effect of adding new LLPs to the Aleutians Islands non-AFA trawl groundfish CV fishery based on harvests during the respective qualification periods. Harvests for the parallel waters fishery in the Aleutian Islands and also the 2006 State waters fishery are included in the basis for qualification. The options for Component 5 are slightly different from Component 1 to provide inclusion of 2006 groundfish harvests.

Component 5 - Option 1: requires at least one landing of groundfish during the qualification period of 2000-2006.

Component 5 – Option 1 - Suboption 1: requires at least one landing of groundfish during the qualification period of 2000-2005.

Component 5 - Option 2: requires at least one landing of groundfish during the qualification period of 1995-2006.

Component 5 – Option 2 - Suboption 1: requires at least one landing of groundfish during the qualification period of 1995-2005.

Component 5 - Option 3: requires at least two landings of groundfish during the qualification period of 2000-2006.

Component 5 – Option 3 – Suboption 1: requires at least two landings of groundfish during the qualification period of 2000-2005.

Component 5 - Option 4: requires at least two landings of groundfish during the qualification period of 2000-2006.

Component 5 – Option 4 – Suboption 1: requires at least two landings of groundfish during the qualification period of 2000-2005.

Table 1: Alternatives Components and Options for the BSAI Trawl CV LLP and GOA Trawl CV & CP LLP Analysis

Alternative/Element	Alternative 1 - No Action	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Change to LLP licenses being considered.	Existing situation to continue. LLPs will remain as currently configured.	Implement LLP threshold criteria based upon BSAI and GOA management areas	Implement LLP threshold criteria based upon BSAI and GOA management areas	Implement LLP threshold criteria based upon submanagement areas for the BS, AI, WG and CG.	Implement LLP threshold criteria based upon submanagement areas for the BS, AI, WG and CG.
Component 1: trawl landing requirement for trawl groundfish/all groundfish harvested	no landing requirement implemented	Trawl LLPS (BSAI CV and GOA CV and CP) – trawl landing requirement (except IFQ sablefish)	Trawl LLPS (BSAI CV and GOA CV and CP) – groundfish landing requirement (except IFQ sablefish)	Trawl LLPS (BSAI CV and GOA CV and CP) – trawl landing requirement (except IFQ sablefish)	Trawl LLPS (BSAI CV and GOA CV and CP) – groundfish landing requirement (except IFQ sablefish)
Component 1: Option 1	no landing requirement implemented	Component 1: Option 1 - at least one landing of groundfish from 2000-2005			
Component 1: Option 1 suboption 1	no landing requirement implemented	Component 1: Suboption 1 - at least one landing of groundfish from 1995-2005			
Component 1: Option 2	no landing requirement implemented	Component 1: Option 2 - at least two landings of groundfish from 2000-2005			
Component 1: Option 2 suboption 1	no landing requirement implemented	Component 1: Option 2 - Suboption 1: at least two landings of groundfish from 1995-2005			
Component 1: Option 3 exemption for LLPs assigned to vessels < 60 feet length overall	no change from status quo	Component 1: Option 3 - provide an exemption for vessels less than 60 feet from application of threshold criteria.			
Component 1: Option 4 inclusion of non-AFA & non-Amendment 80 BSAI CPs	no change from status quo	Component 1: Option 4 - include BSAI CP LLPs that are not AFA LLPs nor Amendment 80 LLPs			
Component 2: multiple LLPs on a single vessel - 'stacking' of permits	no change to LLP regulations	Catch history of a vessel accumulated while licenses are stacked on the vessel will	Catch history of a vessel accumulated while licenses are stacked on the vessel will	Catch history of a vessel accumulated while licenses are stacked on the vessel will	Catch history of a vessel accumulated while licenses are stacked on the vessel will
Component 2: Option 1	no change to LLP regulations	Component 2: Option 1 - Fully credited to all stacked licenses (with qualifying endorsements and designations)			
Component 3: Option for AFA vessels	no change from status quo	AFA vessels:	AFA vessels:	AFA vessels:	AFA vessels:
Component 3: Option 1	no change from status quo	Component 3: Option 1 - Exclude LLPs originally issued to vessels qualified under the AFA and LLPs used for eligibility in the AFA			
Component 4: Option for Amendment 80 vessels	no change from status quo	Amendment 80 vessels:	Amendment 80 vessels:	Amendment 80 vessels:	Amendment 80 vessels:
Component 4: Option 1	no change from status quo	Component 4: Option 1 - Exclude LLPs originally issued to vessels qualified under Amendment 80 and LLPs used for eligibility in Amendment 80			
Component 5: Option for Aleutian Islands Fisheries. Implement a trawl landing requirement for trawl groundfish/all groundfish harvested, including harvests in 2006	no change from status quo	Non-AFA vessels with a CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.	Non-AFA vessels with a CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.	Non-AFA vessels with a CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.	Non-AFA vessels with a CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.
Component 5: Option 1	no landing requirement implemented	Component 5: Option 1 - at least one landing of groundfish from 2000-2006			
Component 5: Option 1 suboption 1	no landing requirement implemented	Component 5: Suboption 1 - at least one landing of groundfish from 1995-2006			
Component 5: Option 2	no landing requirement implemented	Component 5: Option 2 - at least two landings of groundfish from 2000-2006			
Component 5: Option 2, suboption 1	no landing requirement implemented	Component 1: Option 2 - Suboption 1: at least two landings of groundfish from 1995-2006			

**Agenda Item C-3 Trawl LLP Recency
Supplemental Handout
Summary of Preliminary Analyses for Application of Threshold LLP Harvest
Level Alternatives (revised 12/6/06)**

Alternative 1 - is the no action alternative. Under this alternative, there would be no qualification of area endorsements for trawl groundfish LLPs in the BSAI and GOA, either at the management area level or submanagement area level. Therefore, no LLPs would lose endorsements under the no-action alternative. The issues described in the Council's problem statement would not be addressed.

Alternative 2 - Implements LLP threshold criteria based upon trawl landing requirements for the BSAI and GOA management areas. The tables showing some of the effects of this alternative choice are Tables 1, 2, 3 and 4 below. Note that the alternative does not include CP harvests in the BSAI, with the exception of LLPs on the relatively small number of CPs that are non-AFA and are not qualified under Amendment 80. This latter case is shown in the discussion following Table 1.

Alternative 3 - Implements LLP threshold criteria based upon groundfish landing requirements for the BSAI and GOA management areas.

Alternative 4 - Implements LLP threshold criteria based upon trawl landing requirements for the BS, AI, WG, and CG submanagement areas.

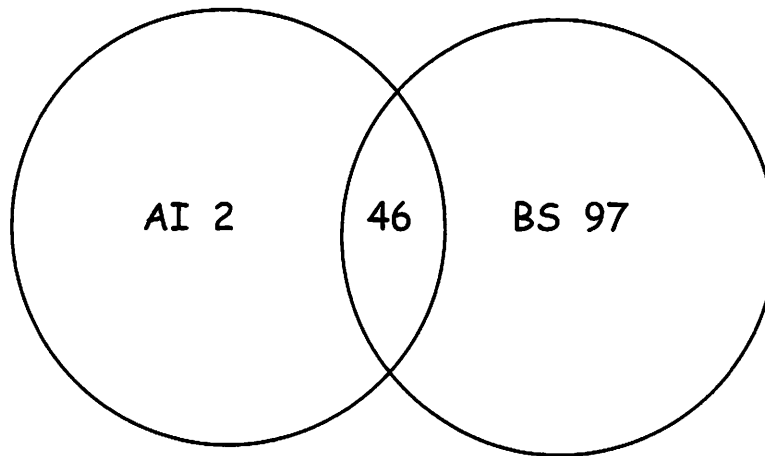
Alternative 5 - Implements LLP threshold criteria based upon groundfish landing requirements for the BS, AI, WG, and CG submanagement areas.

Each of the four action alternatives has a common set of five components that will form the remainder of choices for this amendment. The Council can choose to include and apply any combination from these components to any one of the alternatives identified above.

Tables 1, 2, and 3 to address Alternative 2 and Alternative 3

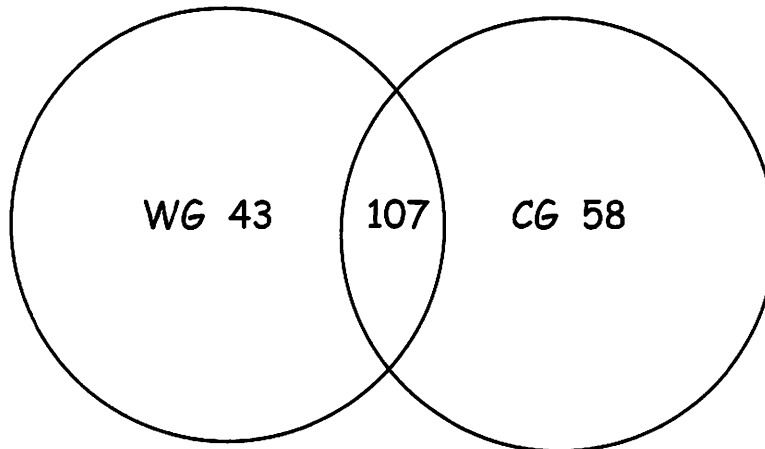
Alternatives 2 and 3 deal with application of the threshold criteria at the management area level. Therefore, LLPs for two areas are included. To show the effect of combining unique LLPs for the BSAI and GOA, the following figures were prepared.

Figure 1: AI has 48 LLPs BS has 143 LLPs Total of 46 LLPs have both areas



145 Unique BSAI Trawl CV LLPs

Figure 2: WG has 150 LLPs CG has 165 LLPs Total of 107 LLPs have both areas



208 Unique GOA Trawl CV LLPs

Table 1: LLP License Holders with BSAI trawl CV endorsements that meet specific groundfish landing thresholds, 1995-2005 and 2000-2005

	Alternative 2 - Trawl		Alternative 3 -Trawl and Non-Trawl	
	Period/ Number of LLPs			
Total number of BSAI trawl CV LLPs = 145	Period/ Number of LLPs		Period/ Number of LLPs	
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =47)	1995-2005	2000-2005	1995-2005	2000-2005
No retained BSAI groundfish harvest	26	31	11	23
At least one landing BSAI groundfish	21 (26)	16 (31)	36 (11)	24 (23)
At least two landings BSAI groundfish	20 (27)	15 (32)	35 (12)	23 (24)
AFA trawl CV LLPs (total number of LLPs = 98)	1995-2005	2000-2005	1995-2005	2000-2005
No retained BSAI groundfish harvest	0	4	0	4
At least one landing BSAI groundfish	98 (0)	94 (4)	98 (0)	94 (4)
At least two landings BSAI groundfish	98 (0)	94 (4)	98 (0)	94 (4)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained BSAI groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 2: LLP License Holders with GOA trawl CV endorsements that meet specific groundfish landing thresholds, 1995-2005 and 2000-2005

	Alternative 2 - Trawl		Alternative 3 -Trawl and Non-Trawl	
	Period/ Number of LLPs			
Total number of GOA trawl CV LLPs = 208	Period/ Number of LLPs		Period/ Number of LLPs	
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =117)	1995-2005	2000-2005	1995-2005	2000-2005
No retained GOA groundfish harvest	21	37	10	20
At least one landing GOA groundfish	96 (21)	80 (37)	107 (10)	97 (20)
At least two landings GOA groundfish	95 (22)	79 (38)	105 (12)	95 (22)
AFA trawl CV LLPs (total number of LLPs = 91)	1995-2005	2000-2005	1995-2005	2000-2005
No retained GOA groundfish harvest	2	48	2	48
At least one landing GOA groundfish	89 (2)	43 (48)	89 (2)	43 (48)
At least two landings GOA groundfish	87 (4)	34 (57)	87 (4)	34 (57)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained GOA groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 3: LLP License Holders with GOA trawl CP endorsements that meet specific groundfish landing thresholds, 1995-2005 and 2000-2005

	Alternative 2 -Trawl		Alternative 3 -Trawl and Non-Trawl	
	Period/ Number of LLPs			
Total number of GOA trawl CP LLPs = 36	Period/ Number of LLPs		Period/ Number of LLPs	
Non-AFA trawl CP LLPs (total number of non-AFA LLPs = 4)	1995-2005	2000-2005	1995-2005	2000-2005
No retained GOA groundfish harvest	4	4	2	2
At least one landing GOA groundfish	0 (4)	0 (4)	2 (2)	2 (2)
At least two landings GOA groundfish	0 (4)	0 (4)	2 (2)	2 (2)
AFA trawl CP LLPs (total number of AFA LLPs =8)	1995-2005	2000-2005	1995-2005	2000-2005
No retained GOA groundfish harvest	3	6	3	6
At least one landing GOA groundfish	5 (3)	2 (6)	5 (3)	2 (6)
At least two landings GOA groundfish	5 (3)	1 (7)	5 (3)	1 (7)
Amendment 80 trawl CP LLPs (total number of LLPs =24)	1995-2005	2000-2005	1995-2005	2000-2005
No retained GOA groundfish harvest	1	3	1	3
At least one landing GOA groundfish	23 (1)	21 (3)	23 (1)	21 (3)
At least two landings GOA groundfish	22 (2)	20 (4)	22 (2)	20 (4)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained GOA groundfish harvests and include groundfish destined for meal production.

Note: harvests include both CP landings operating as a CP and, where applicable, landings of the CPs making landings as a CV.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Tables 4, 5, 6, 7, 8 and 9 to address Alternative 4 and Alternative 5

Table 4: LLP License Holders with AI trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005

	Alternative 4 - Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs			
Total number of AI trawl CV LLPs = 48	Period/ Number of LLPs		Period/ Number of LLPs	
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =6)	1995-2005	2000-2005	1995-2005	2000-2005
No retained AI groundfish harvest	5	5	2	.5
At least one landing AI groundfish	1 (5)	1 (5)	4 (2)	1 (5)
At least two landings AI groundfish	1 (5)	1 (5)	4 (2)	1 (5)
AFA trawl CV LLPs (total number of LLPs =42)	1995-2005	2000-2005	1995-2005	2000-2005
No retained AI groundfish harvest	3	18	3	18
At least one landing AI groundfish	39 (3)	24 (18)	39 (3)	24 (18)
At least two landings AI groundfish	35 (7)	21 (21)	35 (7)	21 (21)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained AI groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 5: LLP License Holders with BS trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005

	Alternative 4 - Trawl		Alternative 5 - Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of BS trawl CV LLPs = 143				
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =45)	1995-2005	2000-2005	1995-2005	2000-2005
No retained BS groundfish harvest	25	30	11	22
At least one landing BS groundfish	20 (25)	15 (30)	34 (11)	23 (22)
At least two landings BS groundfish	19 (26)	14 (31)	33 (12)	22 (23)
AFA trawl CV LLPs (total number of LLPs =)	1995-2005	2000-2005	1995-2005	2000-2005
No retained BS groundfish harvest	0	4	0	4
At least one landing BS groundfish	98 (0)	94 (4)	98 (0)	94 (4)
At least two landings BS groundfish	98 (0)	94 (4)	98 (0)	94 (4)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained BS groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 6: LLP License Holders with WG trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005

	Alternative 4 -Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of WG trawl CV LLPs = 150				
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =72)	1995-2005	2000-2005	1995-2005	2000-2005
No retained WG groundfish harvest	18	25	10	15
At least one landing WG groundfish	54 (18)	47 (25)	62 (10)	57 (15)
At least two landings WG groundfish	54 (18)	44 (26)	58 (14)	51 (21)
AFA trawl CV LLPs (total number of LLPs =78)	1995-2005	2000-2005	1995-2005	2000-2005
No retained WG groundfish harvest	8	55	8	55
At least one landing WG groundfish	70 (8)	23 (55)	70 (8)	23 (55)
At least two landings WG groundfish	68 (10)	13 (65)	68 (10)	13 (65)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained WG groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 7: LLP License Holders with CG trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005

	Alternative 4-Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of CG trawl CV LLPs = 165	1995-2005	2000-2005	1995-2005	2000-2005
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =105)				
No retained CG groundfish harvest	16	48	7	31
At least one landing CG groundfish	89 (16)	57 (48)	98 (7)	74 (31)
At least two landings CG groundfish	89 (16)	51 (54)	98 (7)	68 (37)
AFA trawl CV LLPs (total number of AFA LLPs =60)	1995-2005	2000-2005	1995-2005	2000-2005
No retained CG groundfish harvest	9	31	9	31
At least one landing CG groundfish	51 (9)	29 (31)	51 (9)	29 (31)
At least two landings CG groundfish	50 (10)	27 (33)	50 (10)	27 (33)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained CG groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 8: LLP License Holders with WG CP endorsements that meet specific harvest thresholds, 1995-2005 and 2000-2005

	Alternative 4 -Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of WG trawl CP LLPs = 28	1995-2005	2000-2005	1995-2005	2000-2005
AFA trawl CP LLPs (total number of AFA LLPs =6)				
No retained WG groundfish harvest	3	4	3	4
At least one landing WG groundfish	3 (3)	2 (4)	3 (3)	1 (4)
At least two landings WG groundfish	3 (3)	1 (5)	3 (3)	1 (4)
Amendment 80 trawl CP LLPs (total number of LLPs =22)	1995-2005	2000-2005	1995-2005	2000-2005
No retained WG groundfish harvest	2	3	2	3
At least one landing WG groundfish	20 (2)	19 (3)	20 (2)	19 (3)
At least two landings WG groundfish	20 (2)	19 (3)	20 (2)	19 (3)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained WG groundfish harvests and include groundfish destined for meal production.

Note: harvests include both CP landings operating as a CP and, where applicable, landings of the CPs making landings as a CV.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Table 9: LLP License Holders with CG CP endorsements that meet specific harvest thresholds, 1995-2005 and 2000-2005

	Alternative 4 -Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of CG trawl CP LLPs = 25	1995-2005	2000-2005	1995-2005	2000-2005
Non-AFA trawl CP LLPs (total number of Non-AFA LLPs = 4)	1995-2005	2000-2005	1995-2005	2000-2005
No retained CG groundfish harvest	4	4	2	2
At least one landing CG groundfish	0 (4)	0 (4)	2 (2)	2 (2)
At least two landings CG groundfish	0 (4)	0 (4)	2 (2)	2 (2)
AFA trawl CP LLPs (total number of AFA LLPs =4)	1995-2005	2000-2005	1995-2005	2000-2005
No retained CG groundfish harvest	0	3	0	3
At least one landing CG groundfish	4 (0)	1 (3)	4 (0)	1 (3)
At least two landings CG groundfish	4 (0)	0 (4)	4 (0)	0 (4)
Amendment 80 trawl CP LLPs (total number of LLPs =17)	1995-2005	2000-2005	1995-2005	2000-2005
No retained CG groundfish harvest	0	2	0	2
At least one landing CG groundfish	17 (0)	15 (2)	17 (0)	15 (2)
At least two landings CG groundfish	16 (1)	12 (5)	17 (0)	12 (5)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained CG groundfish harvests and include groundfish destined for meal production.

Note: harvests include both CP landings operating as a CP and, where applicable, landings of the CPs making landings as a CV.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

Non-AFA, Non-Amendment 80 LLPs – to address Component 1, option 4

At the October, 2006 meeting, the Council added a new option to the LLP analysis. Prior to that time, the proposed amendment did not address the operation of CPs in the BSAI. The new option provides the choice of whether or not to include application of the harvest thresholds for LLPs to CPs operating in the BSAI that are non-AFA and will not be included with the Amendment 80 qualified vessels.

There are a total of five CP LLPs that meet these criteria for the BSAI. Of the five, only four would not meet the harvest threshold of one or greater harvests during the qualification periods, based on trawl CP landings. One of the group would meet the threshold criteria of both one and two landings over both threshold periods. This would be the result under Alternative 2 assumption, to only include trawl landings.

Under the assumptions of Alternative 3, CP non-trawl landings would be included in the analysis of threshold qualification. Under this situation, each of the five non-AFA, non-Amendment 80 CP LLPs would meet the thresholds of both one and two landings over either of the qualification periods.

Table 10 to address Aleutian Islands LLPs under Component 5

This table provides data to evaluate the effects of Component 5. It shows the harvest records for vessels not having an Aleutian Islands LLP endorsement, for both the parallel waters fishery and the 2006 groundfish fishery in State waters. Note that the data for the 2006 State waters fishery are only current through March 2006. It is possible that there could be additional vessels making landings of groundfish within the State waters fishery in 2006 that do not appear in this table.

The data files available do not allow differentiation between one landing and two landings at this time. Therefore, the response to the threshold achievement for at least two groundfish harvests is marked n/a. It is likely that the vessels achieving greater than one landing would also achieve two landings. This problem will be resolved for the next version of this analysis.

Also, please note that the three of the vessels making landings in the State waters fishery in 2006 also had landings in the parallel waters fishery. Therefore, the number of vessels achieving the harvest threshold for the State waters fishery is four, if we do not count the vessels already accounted in the parallel waters count. The sum total of vessels for both areas that would achieve the threshold level of at least one landing is 21 vessels. This number of vessels would receive AI LLPs if Component 5 is selected by the Council.

Table 10: Vessels without AI trawl CV LLP endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005 Parallel Waters and State waters Fisheries

Qualification period	1995-2005	2000-2005	2006
	# of vessels	# of or vessels	# of vessels
Non-AFA trawl CV without an AI LLP	Parallel waters fishery	Parallel waters fishery	2006 State waters fishery
At least one landing AI groundfish	17	17	7 ⁽¹⁾
At least two landings AI groundfish	n/a	n/a	7 ⁽¹⁾

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained AI groundfish harvests and include groundfish destined for meal production.

(1) Note that three of the seven vessels participating in the 2006 State waters fishery also appear in the parallel waters totals.

Public Testimony Sign-Up Sheet

Agenda Item C-3 TRAWL Recency

	NAME (PLEASE PRINT)	AFFILIATION
1	Russell Pritchett & Chuck Burroce	Independent Cod Trawlers Assn.
2	BRENT PAINE	UCB
3	Julia Tenney	ACDB
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.