


MEMORANDUM

TO: Council, SSC, and AP Members

FROM: Chris Oliver   
Acting Executive Director

ESTIMATED TIME 1 HOUR
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DATE: February 1, 2001

SUBJECT: GOA Rationalization

**ACTION REQUIRED**

Receive committee report.

**BACKGROUND**

At its December 2000 meeting, the Council disbanded the Gulf of Alaska Co-op Committee, which was appointed during final action on American Fisheries Act sideboard measures in December 1998. The newly-appointed 18-member GOA Rationalization Committee (Item C-5(a)) will have its initial meeting this week to develop elements and options for analysis by the June 2001 meeting. The Council notified the committee that it will be disbanded after its final report to the Council. Further, it should consider the National Academy of Science report and recommended standards when considering any type of IFQ program. It was also asked to develop a schedule for submission of new proposals for GOA rationalization and advise the Council of its work plan.

The Consolidated Appropriations Act of 2001 amended the Magnuson-Stevens Act to state that the:

Section 144(b)(2). North Pacific Fishery Management Council shall examine the fisheries under its jurisdiction, particularly the Gulf of Alaska groundfish and Bering Sea crab fisheries, to determine whether rationalization is needed. In particular, the North Pacific Council shall analyze individual fishing quotas, processor quotas, cooperatives, and quotas held by communities. The analysis should include an economic analysis of the impact of all the options on communities and processors as well as the fishing fleets. The North Pacific Council shall present its analysis to the appropriations and authorizing committees of the Senate and House of Representatives in a timely manner.

It is likely that such a broad program would take considerable time to develop and implement. Coincident with GOA rationalization, the Council has also noticed the public that it is considering rationalization options specifically for the GOA Pacific cod fisheries and Bering Sea crab fisheries (see Agenda C-6). The Council indicated in past discussions that it may wish to initiate more near-term rationalization options, specifically for Pacific cod fisheries.

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Telephone 486-3453



January 31, 2001

Mr. David Benton, Chairman  
North Pacific Fishery Management CouncilRe: C-5 GOA Rationalization

Dear Mr. Benton,

**RECEIVED**  
JAN 31 2001  
N.P.F.M.C

The United Fishermen's Marketing Association, Inc. (UFMA), requests that the Council proceed with the development and adoption of recency endorsements for the GOA p. cod fishery. We further request that the Council begin the analysis of the alternatives and options for recency endorsements for the GOA p. cod fishery that were recommended to the Council by the Advisory Panel in June, 2000. Finally, we request that the Council schedule the issue of recency endorsements for the GOA p. cod fishery for further development and action at your next meeting.

In April, 2000, the Council appropriately adopted Amendment 67 which accomplishes recency endorsements for the BSAI p. cod fixed gear fisheries. During consideration of Amendment 67, the Council and the Advisory Panel heard significant public testimony that indicated that such recency endorsements would have the effect of displacing a significant number of vessels to the GOA p. cod fishery from the BSAI fixed gear p. cod fishery.

GOA p. cod harvesters are concerned that this displacement will negatively impact the entire GOA p. cod fishery, including trawl, pot, hook and line and jig harvesters who have an economic dependency on the GOA p. cod fishery. Several GOA p. cod harvesters have indicated that their activities in the GOA p. cod fishery are very important to them, and that they are concerned that their opportunities to harvest GOA p. cod are at serious risk from latent GOA groundfish licenses generally, and from the influx of displaced BSAI fixed gear vessels.

During AP deliberation of Amendment 67 during the April, 2000, AP meeting, the AP expressed concern with respect to the impacts of Amendment 67 on the GOA p. cod fishery. The AP motion on Amendment 67 ("C-4 Pacific Cod License Limitation Endorsements") states, in part:

"The AP recommends the Council adopt Alternative 2-Limit entry to the BSAI P. Cod fixed gear fisheries based on historical participation." This motion passed 16-0. ". . . Finally, the AP requests the Council to initiate an analysis to establish p. cod species and area endorsements in the GOA that mirror the BS elements and options." This motion passed 16-0.

During Council deliberation of Amendment 67 during the April, 2000, Council meeting, the Council demonstrated concern with respect to the impacts and consequences of Amendment 67 on the GOA p. cod fishery, and agreed to begin consideration of the issue of recency endorsements for the GOA p. cod fishery at the June, 2000, Council meeting. The Council motion on Amendment 67 ("C-4 Pacific Cod LLP Endorsements") states, in part:

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“ ... to schedule a discussion for the June meeting with regard to initiation of an analysis to establish Pacific cod species and area endorsements for the Gulf of Alaska. Additionally, the Council notices the public that landings in Gulf of Alaska fisheries after April 16, 2000 may not be counted when the Council considers any type of rationalization program.” The motion passed unanimously.

The GOA Co-Op Committee included references to “latent” effort and permit concerns with respect to the GOA p. cod fishery in 2 of the 4 recommendations that they made to the Council during their April 10, 2000, meeting,

“The committee seeks clarification from NOAA GC regarding Council limitations on developing amendments to 1) limit effort and 2) Gulf LLP qualification criteria (eliminate latent permits); and ...”

“The Chairman is requested to schedule an agenda item under Staff Tasking at the June meeting to consider initiating an analysis to reduce latent effort in the W/C GOA groundfish and crab fisheries...”

The Council Newsletter of April, 2000 (News and Notes, Volume 2-2000), contained 2 articles that addressed the direction toward rationalization in the GOA p. cod fishery,

“BSAI Pacific Cod License Limitation Program: The Council approved the . . . program for applying Pacific cod endorsements to vessels with appropriate levels of historic participation in the BSAI fixed gear cod fishery. . . Required catch history to earn a Pacific cod endorsement was defined for the freezer longline, longline catcher vessel, pot catcher processor, and pot catcher vessel sectors. . . Gulf of Alaska Issues: The Council also noticed industry that they will be considering rationalization options for the GOA P.cod fisheries at the June 2000 Council meeting(see below). As part of that motion, the Council also noticed industry that landings that take place after April 16, 2000 may not count in any GOA rationalization programs considered by the Council.”

“Gulf of Alaska Co-op Committee: While the Council discussion this coming June (discussed in previous LLP article) may be specific to Gulf Pacific cod fisheries, the Gulf of Alaska Co-op Committee . . .”

Council staff prepared a discussion paper for the June, 2000, Council meeting that included preliminary data that are germane to recency endorsements for the GOA p. cod fisheries.

During their June, 2000, meeting, the AP recommended a suite of alternatives and options to the Council that were intended to serve as a basis to expand the Council discussion paper, and continue the development of recency endorsements for the GOA p. cod fishery (Attachment 1). The AP motion on “C-5 Staff Tasking (b) Next steps on GOA P.cod rationalization” states, in part:

“The AP recommends that the Council begin an initiative to implement further LLP

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endorsements for GOA P.cod and BSAI trawl P.cod. If an initiative for further LLP endorsements in the BSAI P.cod trawl fisheries is supported by the AP, it is with the clear intent that the GOA is a clear priority and in great need of immediate attention. It is noted that the endorsements may be different for the different areas of the GOA (WGOA, CGOA, etc.) . . . “ The motion passed unanimously 17-0.

The Council Newsletter of June, 2000 (News and Notes, Volume 3-2000), contained an article that addressed GOA p. cod rationalization,

“Gulf of Alaka Cooperatives: . . . A separate initiative to rationalize the Gulf Pacific cod fishery is being considered by the council. . .”

The AP did not address GOA Rationalization (D-1) or Staff Tasking (D-3) during the October, 2000, meeting because of time constraints. However, the AP recommended a recency requirement for trawl vessels. The AP motion on “C-2 (b) Groundfish Processing Sideboards and Excessive Share Caps” states, in part:

“Processing Sideboards-The AP recommends . . . Additionally, the AP requests the analysis include a recency requirement for trawl vessels.” The motion passed 9-8.

Therefore, affected individuals in the BSAI trawl p. cod fishery were successful in restating their need for recency requirements in the AP recommendation with respect to the “Groundfish Processing Sideboards and Excessive Share Caps” Agenda item. Since this Agenda item was specific to the BSAI, it was not possible for affected individuals in the GOA p. cod fishery to use this vehicle to restate their similar need. As previously noted, in June, 2000, the AP indicated the need for recency endorsements in the BSAI trawl p. cod fishery; however, it was positioned as secondary to the need for recency endorsements in the GOA p. cod fishery. Nevertheless, this attempt to address recency endorsements in the BSAI trawl p. cod fishery is a further indication that recency endorsements in the BSAI and GOA p. cod fisheries are in need of immediate Council attention. We note that the original AP motion in June, 2000, with respect to this issue indicated that the need for GOA recency endorsements in the GOA p. cod fishery was “a clear priority and in great need of attention.”

The Gulf of Alaska Co-op Committee made several recommendations to the Council at their October 5, 2000, meeting, including the recommendation that,

“The Council consider eliminating latent licenses in the GOA using a recency requirement as soon as possible.”

The Council has invested a great deal of its resources in issues that address BSAI groundfish. We respectfully request the Council to address a pressing need in the GOA p. cod fishery; that is, the adoption of recency endorsements for the GOA p. cod fishery.

Developing a rationalization package that is ready for final Council action, and that encompasses all GOA groundfish species (Areas 620-640) is a very difficult task. The Staff MEMORANDUM for the

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October, 2000, Agenda Item D-1(c) (September 27, 2000; SUBJECT: Gulf of Alaska Rationalization) states, in part,

"During final action on AFA . . . the Council added a framework proposal . . . for pollock co-operatives in the Gulf of Alaska to staff tasking noting that **this task would not be started by staff until the committee formed to study this issue has completed its work.**"

"It is likely that **such a broad program** (all groundfish species in Area 620-640) **would take considerable time to develop and implement.** Coincident with GOA rationalization, **the Council has also noticed the public that it is considering rationalization options specifically for the GOA Pacific cod fisheries.** The Council indicated it may wish to initiate more near-term rationalization options specifically for the cod fisheries . . ."

The realities of the FMP Amendment and rulemaking process lead to the conclusion that the effective date of the regulations that implement a Plan Amendment for such a broad program as is represented by an all-species GOA rationalization program is so far into the future as to be questionable as to its ability to be meaningful, and to solve contemporary problems.

Specific and immediate needs of the GOA p. cod fishery, including the interaction of Steller sea lions with the p. cod fishery, can be more readily addressed by the implementation of recency endorsements for GOA p. cod. The removal of latent licenses in the GOA p. cod fleet through the implementation of recency endorsements will result in a more rational p. cod fleet that will converge sometime in the future with an all-species GOA rationalization initiative.

Thank you for your consideration of our interest in this matter.

Sincerely,



Jeffrey R. Stephan

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Attachment 1  
Excerpt from June, 2000, AP Minutes

**C-5 Staff Tasking (b) Next steps on GOA P.cod rationalization**

The AP recommends that the Council begin an initiative to implement further LLP endorsements for GOA P.cod and BSAI trawl P.cod. If an initiative for further LLP endorsements in the BSAI P.cod trawl fisheries is supported by the AP, it is with the clear intent that the GOA is a clear priority and in great need of immediate attention. It is noted that the endorsements may be different for the different areas of the GOA (WGOA, CGOA, etc.)

**Freezer Longline Vessels:**

Qualification Years:

- Option 1: Any two years 1995, 1996, 1997, 1998
- Option 2: Any two years 1995, 1996, 1997, 1998, 1999
- Option 3: Any two years 1995, 1997, 1998, 1999
- Option 4: Any three years of 1995, 1996, 1997, 1998
- Option 5: Any three years of 1995, 1996, 1997, 1998, 1999

Minimum poundage requirement during each qualifying year:

- Option 1: 100,001 lbs. - 200,000 lbs.
- Option 2: 200,001 lbs. - 300,000 lbs.
- Option 3: > 300,000 lbs.

**Catcher Longline Vessels:**

Qualification Years:

- Option 1: Any two years 1996, 1997, 1998
- Option 2: Any two years 1996, 1997, 1998, 1999
- Option 3: Any three years of 1995, 1996, 1997, 1998
- Option 4: Any three years of 1995, 1996, 1997, 1998, 1999

Qualification landings (minimum landing requirements):

Minimum poundage requirement during each qualifying year:

- Option 1: 25,000 lbs. - 50,000 lbs.
- Option 2: 50,001 lbs. - 100,000 lbs.
- Option 3: 100,001 lbs. - 300,000 lbs.
- Option 4: > 300,000 lbs.

Suboption 1 : Allow catcher vessels less than 60' LOA to use their jig landing as part of their catch history to apply towards a minimum landing requirement.

Suboption 2 : Allow all catcher vessels to use their jig landing as part of their catch history to apply towards a minimum landing requirement.

**Pot Gear Catcher Vessels:**

Qualification Years:

- Option 1: Any two years of 1995, 1996, 1997, 1998
- Option 2: Any two years of 1995, 1996, 1997, 1998, 1999
- Option 3: Any three years of 1995, 1996, 1997, 1998
- Option 4: Any three years of 1995, 1996, 1997, 1998, 1999
- Option 5: Any four years of 1995, 1996, 1997, 1998,
- Option 6: Any four years of 1995, 1996, 1997, 1998, 1999



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AND

Qualification landings (minimum landing requirements):

Minimum pounds required for delivery during each qualifying year:

Option 1: 25,000 lbs. - 50,000 lbs.

Option 2: 50,001 lbs. - 100,000 lbs.

Option 3: 100,001 lbs. - 300,000 lbs.

Option 4: > 300,000 lbs.

**Pot Gear Catcher Processor Vessels:**

Qualification Years:

Option 1: Any two years of 1995, 1996, 1997, 1998

Option 2: Any two years of 1995, 1996, 1997, 1998, 1999

Option 3: Any three years of 1995, 1996, 1997, 1998

Option 4: Any three years of 1995, 1996, 1997, 1998, 1999

Option 5: Any four years of 1995, 1996, 1997, 1998,

Option 6: Any four years of 1995, 1996, 1997, 1998, 1999

AND

Qualification landings (minimum landing requirements):

Minimum pounds required for delivery during each qualifying year:

Option 1: 25,000 lbs. - 50,000 lbs.

Option 2: 50,001 lbs. - 100,000 lbs.

Option 3: 100,001 lbs. - 300,000 lbs.

Option 4: > 300,000 lbs.

**Trawl Catcher Vessels:**

Qualification Years:

Option 1: Any two years of 1995, 1996, 1997, 1998

Option 2: Any two years of 1995, 1996, 1997, 1998, 1999

Option 3: Any two years of 1996, 1997, 1998, 1999

Option 4: Any three years of 1995, 1996, 1997, 1998

Option 5: Any three years of 1995, 1996, 1997, 1998, 1999

Option 6: Any four years of 1995, 1996, 1997, 1998

Option 7: Any four years of 1995, 1996, 1997, 1998, 1999

Option 8: Any five years of 1995, 1996, 1997, 1998, 1999

AND

Qualification landings (minimum landing requirements):

Minimum pounds required for delivery during each qualifying year:

Option 1: 50,001 lbs. - 100,000 lbs.

Option 2: 100,001 lbs. - 300,000 lbs.

Option 3: > 300,000 lbs.

**Trawl Catcher Processors:**

Qualification Years:

Option 1: Any two years of 1995, 1996, 1997, 1998

Option 2: Any two years of 1995, 1996, 1997, 1998, 1999

Option 3: Any two years of 1995, 1996, 1997

Option 4: Any two years of 1996, 1997, 1998

Option 5: Any two years of 1996, 1997, 1998, 1999

Option 6: Any three years of 1995, 1996, 1997, 1998

Option 7: Any three years of 1995, 1996, 1997, 1998, 1999

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AND

Qualification landings (minimum landing requirements):  
Minimum pounds required for delivery during each qualifying year:  
Option 1: 100,001 lbs. - 300,000 lbs.  
Option 2: > 300,000 lbs.

**Jig Gear Vessels:**

Qualification Years:

Option 1: Anyone year of 1995, 1996, 1997, 1998  
Option 2: Any one year of 1995, 1996, 1997, 1998, 1999  
Option 3: Any two years of 1995, 1996, 1997, 1998  
Option 4: Any two years of 1995, 1996, 1997, 1998, 1999  
Option 5: Any three years of 1995, 1996, 1997, 1998  
Option 6: Any three years of 1995, 1996, 1997, 1998, 1999

AND

Qualification landings (minimum landing requirements):  
Minimum pounds required for delivery during each qualifying year:  
Option 1: A landing only (no minimum poundage required)  
Option 2: 25,000 lbs. - 50,000 lbs.  
Option 3: 50,001 lbs. - 100,000 lbs.  
Option 4: over 100,001 lbs.

**Exemptions**

Analyze options that exempt the following vessel sizes from the gear and area endorsements:

1. 58'
2. 50'
3. 48'

The AP also requests the following:

1. Information on catch history by sector using the years 1995-April 16, 2000
2. Information on points of delivery

*Motion passed unanimously 17-0.*