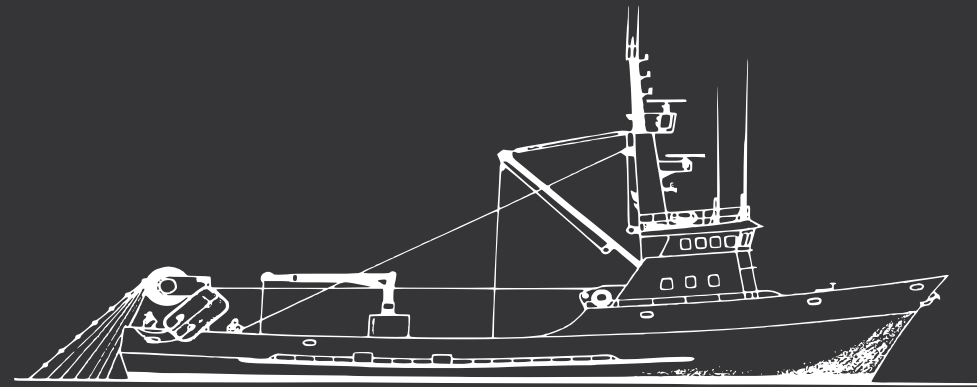


**Bering Sea/ Aleutian Islands Pacific Cod
Limited Access Privilege Program Scoping Paper
for the Trawl Catcher Vessel Sector and Pot
Catcher Vessels \geq 60 feet**



October 2019 NPFMC meeting

Homer, AK

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Organization of the Scoping Paper

1. Intro
 - 1.1 Tasking on a scoping paper
 - 1.2 Brief summary of BSAI Pacific cod management
2. MSA elements of a Limited Access Privilege Program (LAPP)
3. Examples of Cooperative Programs in the North Pacific (including table)
4. Consideration of a Trawl CV sector LAPP
5. Consideration of a pot sector LAPP, for vessels ≥ 60 ft
6. Impacts of proposed LAPPs on other sectors
7. Conclusions and next steps

Table of Cooperative Programs in the North Pacific

(Section 3.6, page 21)

	Freezer Longline Conservation Cooperative	BSAI crab rationalization	AFA BSAI pollock	Amendment 80 Bering Sea non-pollock groundfish trawl fishery	Central GOA Rockfish Program
Type of allocation	Sector allocation of cod and Pacific cod LLP license endorsement in Dec 2004	Individual fishing quotas with cooperative option	Cooperatives with limited access option	Cooperatives with limited access option	Cooperatives with entry level fishery
Year implemented	2006 limited participation; by the 2010 B season full participation.	2005-2006 season	1999 and 2000	2008	2007 pilot program & 2012 Rockfish Program
Catalyst for program	Derby fishery Short seasons Overcapitalization Safety	Derby fishery Short seasons Overcapitalization Safety	Allocation dispute between inshore and offshore sectors	Bycatch reduction and individual bycatch accountability	Derby fishery Short seasons Loss of product quality Conflicts with other fisheries (salmon)
Fishing Areas	BSAI	BSAI	BSAI	BSAI	Central GOA
Program development	Council limited LLP licenses, sector developed cooperative program	Council program under specific Congressional authority	Congressionally developed program with some Council developed components	Council developed program under MSA authority	Pilot: Congressional mandated program developed by the Council. RP developed by the Council under MSA.
Harvester initial allocation	Determined by members	97% to limited entry LLP license holders; 3% to captains (based on catch histories)	Vessel owners (based on catch histories)	Vessel owners (based on catch histories)	LLP holders (based on catch histories of the LLP license)
Processor component	N/A	Processor QS and price arbitration	Severable processor/cooperative associations	N/A	Pilot: Non-severable processor/cooperative association based on landings history; RP Kodiak landing requirement.
Gear type	Longline	Pot	Mid-water trawl	Pelagic and bottom trawl	Bottom and semi-pelagic trawl
Area/species allocations	None by Council: Sector: 1 allocation plus; 1 bycatch allocation	9 allocations	2 allocations	10 allocations plus; 5 bycatch allocations	8 allocations plus; 1 bycatch allocation
Number of vessels in season prior to program implementation	38	167 BS C. opilio; 251 Bristol Bay red king crab; 20 AI golden king crab.	113 CVs 38 C/Ps	22	25 CVs 6 C/Ps
Number of vessels in most recent season	28	68	81 CVs 15 CPs	20	26 CVs 4 C/Ps

Table of Cooperative Programs in the North Pacific

(Section 3.6, page 21)

	Freezer Longline Conservation Cooperative	BSAI crab rationalization	AFA BSAI pollock	Amendment 80 Bering Sea non-pollock groundfish trawl fishery	CGOA Rockfish Program
Observers	200%	100% C/P 20% - 50% CVs (varies by fishery)	200% C/P 100% CVs	200%	200% C/Ps 100% CVs
Cap on individual share holdings/use	None in regulation	1% - 10% (varies by fishery)	17.5%	30% of aggregate quota	4% CVs 40% C/Ps
Vessel use caps	None in regulation	None in cooperative; 2% - 20% of outside cooperative (varies by fishery)	17.5%	20% of aggregate quota	60% for C/Ps 8% for CVs
Cooperative use cap	None in regulations	None	None	None	30% for CVs
Processing cap	N/A	30% of processor shares by fishery	30%	N/A	30%
Share classes	None in regulations	Operation type (CV/C/P) and owner share/crew share	Operation type (CV shoreside/C/P/ CV mothership)	No	Operation type (CV/C/P)
Owner-on-board/ active participation requirements	None	Active participation requirement for crew shares	None	None	None
Eligibility to acquire shares	Shares are not issued, must hold valid LLP	Sea time requirement for all shares; active participation requirements for crew shares	None	None	None
Community provisions	None	2-year port-specific landing requirement; regional landing requirements; community right of first refusal on processor quota	None	N/A	Kodiak delivery requirement for CVs
Elements to improve entry opportunities	None	Crew share QS requires active participation for acquisition and retention; loan program	None	None	Set-aside Entry Level Longline
Subject to Cost Recovery	No	Yes	Yes	Yes	Yes

Summary of BSAI Pacific Cod Management

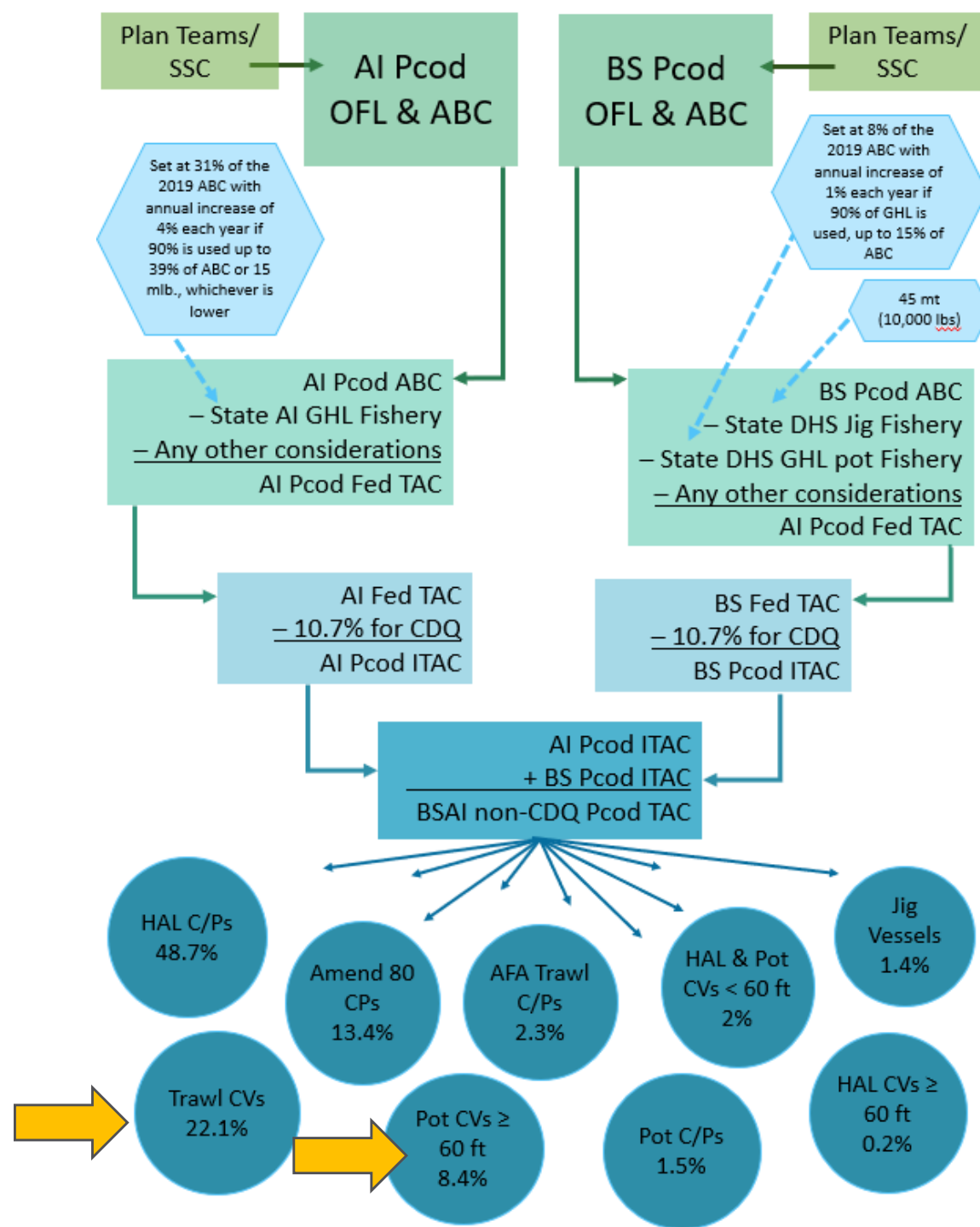


Photo credit: NPFMC

Section 1.3, page 4

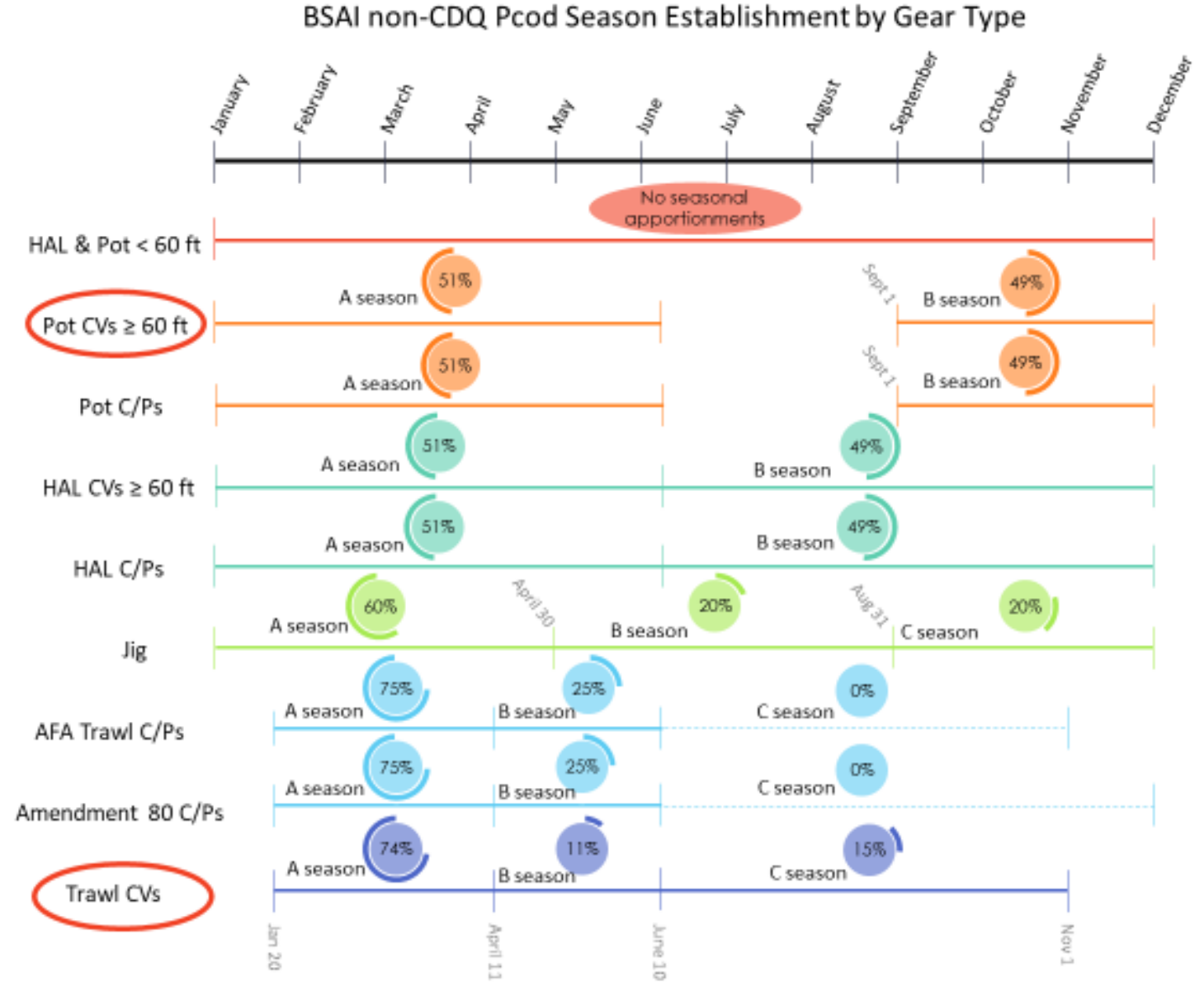
BSAI Cod Specs and Sector Allocations

(Figure 1-1, page 6)



BSAI non-CDQ Pacific cod seasonal apportionments by gear type

(Figure 1-2, page 8)



Number of LLP licenses issued in BSAI by endorsement

(Table 1-1, page 9)

Sector	Sum of AI_C/P_PCOD_HAL2	Sum of BS_C/P_PCOD_HAL2	Sum of AI_C/P_PCOD_POT2	Sum of BS_C/P_PCOD_POT2	Sum of AI_CV_PCOD_HAL2	Sum of BS_CV_PCOD_HAL2	Sum of AI_CV_PCOD_POT2	Sum of BS_CV_PCOD_POT2	Sum of AI_TRAWL_C/P2	Sum of BS_TRAWL_C/P2	Sum of AI_TRAWL_CV2	Sum of BS_TRAWL_CV2	Sum of A802	Sum of AFA
AI_C/P_PCOD_HAL	34													
BS_C/P_PCOD_HAL	34	36												
AI_C/P_PCOD_POT	3	3	5											
BS_C/P_PCOD_POT	3	3	5	8										
AI_CV_PCOD_HAL	0	0	1	1	8									
BS_CV_PCOD_HAL	0	0	1	1	7	8								
AI_CV_PCOD_POT	0	0	0	0	0	0	3							
BS_CV_PCOD_POT	0	0	0	0	0	1	2	49						
AI_TRAWL_C/P	0	0	0	0	0	0	0	0	50					
BS_TRAWL_C/P	0	0	0	0	0	0	0	0	49	58				
AI_TRAWL_CV	0	0	0	0	1	0	0	0	0	0	43			
BS_TRAWL_CV	0	0	0	0	0	0	0	0	0	0	42	114		
A80	0	0	0	0	0	0	0	0	19	26	0	0	26	
AFA	0	0	0	0	0	0	0	0	25	27	42	98	0	128

MSA Elements of a LAPP



Photo credit: NPFMC

Section 2, page 10

MSA Elements of LAPP (Section 2, page 10)

- Section 303A of the MSA
- 13 required elements (Section 2.1, page 10)
- 2 additional required elements
 - Allocation
 - Excessive Consolidation
- Discretionary elements (Section 2.2, page 12)

LAPP for BSAI Trawl CV Sector



Photo credit: NPFMC

Section 4, page 23

Program Objectives (Section 4.1, page 23)

Based on the Council's purpose and need statement and previous testimony, some of the conditions that have led to the present CV trawl proposal include:

- a decline in Pacific cod TAC,
- an increase in the number of LLP licenses used by this sector and the risk of additional entrants,
- length of the fishery has compressed in recent years,
- inability to maximize the value of the fishery,
- high bycatch, and
- safety.



Photo credit: NPFMC

Any clarification and/ or specific program goals that can be articulated?

Cooperative Structure (Section 4.2, page 24)

- Council's motion states that harvesting privileges would be fished under cooperatives
- Several important decision points around the structure of trawl CV cooperatives
 - Voluntary? (e.g. FLCC)
 - Maybe AFA-affiliated vessels could organize cooperatives without a regulatory framework, but the diversity of both AFA and non-AFA fleets may create more difficulty forming a voluntary coop
 - If set in regulations, the Council may consider other elements
 - Would cooperative membership be mandatory?
 - If not mandatory, what is the alternative?
 - Would there be restrictions on the number of coops that can form (min or max)?
 - Would there be any restrictions on the percent of QS holders needed to form?
 - Any mechanism for transfers between cooperatives?

Allocation Decisions (Section 4.3, page 26)



MSA states allocations should be fair and equitable and provides guidance.



The analysis includes data on harvest and participation from several angles.

Allocation Decisions (Section 4.3, page 26)

Decision points:

- Which years will be used to establish history?
- Would participation include just targeted catch or targeted and incidental catch?
- How to treat harvest from the AI vs BS – both in eligibility and allocation, as well as how the harvesting privileges can be used?
- How to assign catch history to LLP licenses when more than one LLP license was assigned to the CV at the time the fish were harvested?
- How to assign catch history in the event of internal AFA cooperative leasing?

Allocation Decisions (Section 4.3.1, pages 26-27)

Harvest Participation Data:

- Harvest data included in the tables is 2003 – 2018
 - CAS implemented in 2003
 - Catch data is from trawl CV sector allocation only
 - Does not include State fisheries data (GHL)
 - CDQ fisheries
 - Other federal fisheries sector excluded
- Catch with no LLP license not included
 - Mostly vessels in AI and those using AI transferable endorsement

Allocation Decisions (Table 4-2, page 27)

Targeted cod catch with no LLP license

Weight/Vessels	2003	2004	2005	2006	2007	2008	2009	2010	2012	2015	2016	2017	2018	Total
AI														
Weight (mt)	6,073	2,060	506	1,561	712	550	738	828	225		*		1,190	14,682
Vessels	15	7	4	10	12	10	9	5	3		2		6	30
BS														
Weight (mt)	140	*	*						*	*	*	*		1,037
Vessels	6	2	1						1	1	1	1		11
Total														
Total Weight (mt)	6,213	*	*	1,561	712	550	738	828	*	*	409	*	1,190	15,718
Total Vessels	19	9	5	10	12	10	9	5	4	1	3	1	6	39

Allocation Decisions (Table 4-3, page 28)

Targeted AFA vs non-AFA trawl CV Pacific cod catch

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Non-AFA																	
Landed Catch (mt)	3,173	1,661	1,547	1,568	1,714	3,755	3,776	4,219	7,695	7,066	6,832	6,136	7,874	7,000	6,642	6,868	77,526
Landed Catch (%)	9.4%	4.7%	5.1%	5.1%	6.0%	13.6%	15.0%	17.0%	22.2%	17.4%	17.5%	15.7%	24.8%	16.9%	17.9%	21.1%	14.6%
LLP Licenses	7	6	6	6	9	9	6	7	12	10	11	6	7	9	12	13	18
Vessels	7	6	6	6	8	9	6	7	12	10	11	6	7	9	12	12	20
Processing Plants	6	7	7	8	10	11	8	7	8	8	7	5	7	8	12	14	36
AFA																	
Landed Catch (mt)	30,577	33,424	28,834	29,312	26,724	23,785	21,390	20,540	26,928	33,467	32,142	32,985	23,825	34,307	30,445	25,651	454,338
Landed Catch (%)	90.6%	95.3%	94.9%	94.9%	94.0%	86.4%	85.0%	83.0%	77.8%	82.6%	82.5%	84.3%	75.2%	83.1%	82.1%	78.9%	85.4%
LLP Licenses	64	65	57	52	51	54	42	38	39	48	45	47	45	51	52	53	94
Vessels	63	62	53	48	49	52	40	37	38	44	42	42	40	47	48	48	82
Processing Plants	10	12	11	10	11	12	8	7	11	10	10	9	8	14	14	14	35
Total																	
Total Landed Catch (mt)	33,750	35,086	30,381	30,880	28,439	27,540	25,166	24,759	34,622	40,533	38,974	39,122	31,698	41,308	37,087	32,519	531,863
Total Landed Catch (%)	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Total LLP Licenses	71	71	63	58	60	63	48	45	51	58	56	53	52	60	64	66	109
Total Vessels	70	68	59	54	57	61	46	44	50	54	53	48	47	56	60	60	102
Total Processing Plants	10	13	12	11	12	14	10	8	13	11	12	10	11	17	17	19	41

Allocation Decisions (Section 4.3.2, pages 28-30)

AFA Vessel Consolidation and Sideboard Exempt History:

- Consolidation and Vessel replacement via Coast Guard Act of 2010
 - Table 4-4 (page 29) shows inshore cooperative vessels with inactivity
 - These vessels were replaced or replacement vessels
 - Table also shows which of these vessels had cod activity
 - All LLP licenses of replaced vessels with cod history transferred to active AFA vessels
- AFA created exempt sideboard cod vessels in BSAI
 - 10 AFA CVs met the sideboard exemption criteria and 19 AFA CVs were a member of the MS sector which are exempt from cod sideboards after March 1 of each year
 - Table 4-5 shows trawl CV annual cod target catch for exempt and non-exempt AFA vessels

Allocation Decisions (Table 4-6, page 30)

Targeted and incidental catch of Pacific cod in the trawl CV sector

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Pacific Cod																	
Landed Catch (mt)	33,750	35,086	30,381	30,880	28,439	27,540	25,166	24,759	34,622	40,533	38,974	39,122	31,698	41,308	37,087	32,519	531,863
Landed Catch (%)	90.8%	90.7%	86.6%	89.1%	91.0%	89.5%	87.3%	89.7%	87.1%	86.3%	89.4%	92.5%	84.3%	91.8%	86.8%	89.1%	88.9%
LLP Licenses	71	71	63	58	60	63	48	45	51	58	56	53	52	60	64	66	109
Vessels	70	68	59	54	57	61	46	44	50	54	53	48	47	56	60	60	102
Processing Plants	10	13	12	11	12	14	10	8	13	11	12	10	11	17	17	19	41
Other Species																	
Landed Catch (mt)	3,439	3,610	4,705	3,791	2,806	3,226	3,663	2,853	5,124	6,453	4,635	3,151	5,898	3,710	5,656	3,967	66,687
Landed Catch (%)	9.2%	9.3%	13.4%	10.9%	9.0%	10.5%	12.7%	10.3%	12.9%	13.7%	10.6%	7.5%	15.7%	8.2%	13.2%	10.9%	11.1%
LLP Licenses	95	94	95	90	94	93	93	94	92	95	93	96	96	99	97	98	115
Vessels	91	92	91	87	91	90	90	91	89	92	88	90	89	92	91	89	107
Processing Plants	12	14	12	13	11	13	11	12	11	11	11	11	16	18	16	19	38
Total																	
Landed Catch (mt)	37,189	38,695	35,086	34,670	31,244	30,766	28,830	27,612	39,746	46,987	43,609	42,273	37,596	45,017	42,742	36,486	598,550
Landed Catch (%)	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
LLP Licenses	112	109	109	106	110	109	107	103	107	109	107	104	105	107	107	109	130
Vessels	107	105	104	101	105	104	102	99	104	104	101	98	98	100	101	99	124
Processing Plants	17	19	18	16	16	20	15	13	17	16	16	15	20	22	21	23	50

Allocation Decisions (Table 4-7, page 31)

Targeted Bering Sea vs Aleutian Islands trawl CV Pacific cod catch

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
AI																	
Landed Catch (mt)	11,128	11,378	7,466	8,210	12,895	13,945	14,319	12,188	7,535	6,739	5,120	4,554	*	5,573	2,539	4,064	130,390
Landed Catch (%)	33.0%	32.4%	24.6%	26.6%	45.3%	50.6%	56.9%	49.2%	21.8%	16.6%	13.1%	11.6%	*	13.5%	6.8%	12.5%	24.5%
LLP Licenses	17	14	12	15	21	21	17	19	14	14	7	6	4	9	5	10	32
Vessels	17	14	12	15	21	21	17	19	14	14	7	6	4	9	5	9	39
Processing Plants	7	6	5	5	9	9	6	5	4	6	3	3	2	3	3	5	26
BS																	
Landed Catch (mt)	22,622	23,707	22,915	22,670	15,544	13,595	10,847	12,570	27,088	33,795	33,854	34,568	*	35,734	34,548	28,454	401,473
Landed Catch (%)	67.0%	67.6%	75.4%	73.4%	54.7%	49.4%	43.1%	50.8%	78.2%	83.4%	86.9%	88.4%	*	86.5%	93.2%	87.5%	75.5%
LLP Licenses	64	62	59	54	51	49	34	30	48	53	52	51	52	56	62	63	107
Vessels	62	59	55	50	49	47	32	29	47	50	50	46	47	52	58	58	101
Processing Plants	9	9	10	10	9	11	7	5	11	9	10	9	11	17	17	18	33
Total																	
Total Landed Catch (mt)	33,750	35,086	30,381	30,880	28,439	27,540	25,166	24,759	34,622	40,533	38,974	39,122	31,698	41,308	37,087	32,519	531,863
Total Landed Catch (%)	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Total LLP Licenses	71	71	63	58	60	63	48	45	51	58	56	53	52	60	64	66	109
Total Vessels	70	68	59	54	57	61	46	44	50	54	53	48	47	56	60	60	102
Total Processing Plants	10	13	12	11	12	14	10	8	13	11	12	10	11	17	17	19	41

Allocation Decisions (Sections 4.3.3, pages 31-32)

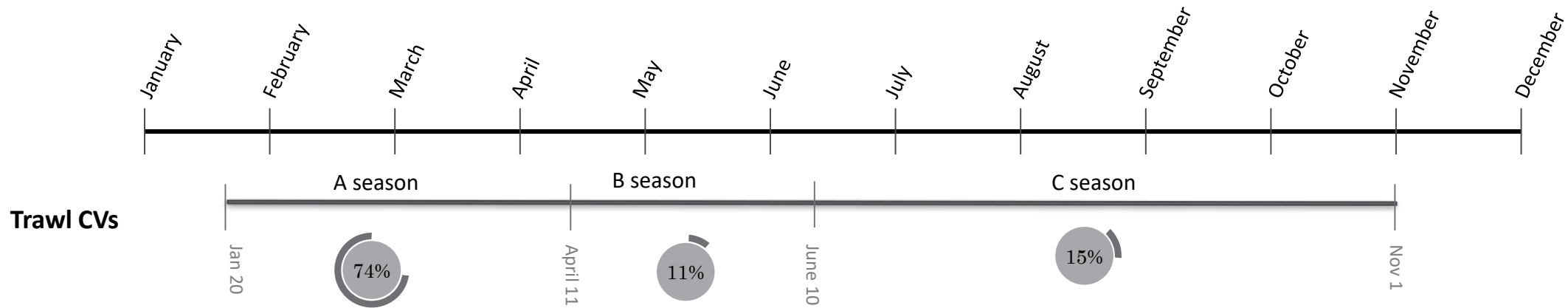
- **Stacking LLP licenses**

- Since more than one LLP license may be assigned to a vessels, Council should define options for assigning catch history for stacked licenses
- Three different methods for addressing stack licenses
 1. If only one LLP license is endorsed for the area fishery or gear used to make the catch, then all of catch history is assigned to that LLP license
 2. If there are two LLPs used to harvest cod in the area, the owner of the vessel used to make the landings may choose which LLP license to assign catch history
 - This would provide more power to the vessel owner versus the LLP license holder if the ownership of the LLP license changes or the LLP license holder was not vessel owner at the time of the landing
 3. Divide the catch history equally between the qualified stacked LLP licenses
- In total, from 2008 – 2018, there were 10 vessels with 21 LLP licenses that had 5.2% of the targeted cod

Allocation Decisions (Sections 4.3.4, pages 32-33)

- Cod transfer within AFA Cooperatives
 - AFA cooperatives are allowed to harvest cod up to the amount defined by their sideboard limits, which are based on member's cod history used to determine the sideboard
 - Once in the cooperative, members may determine how to harvest the available cod
 - Results in members leasing cod
 - Under a cooperative program where cod history is assigned to the LLP license, those transfer have implications relative to who is assigned catch history in a LAPP
 - Staff does not have access to cooperative contracts or individual contracts
 - Double counting catch to credit the person leasing quota and the person harvesting quota could be contentious and staff has no data to provide the additional information
 - Cooperative would either need to provide transfer information or they would need to address the issue internally

Seasonal Allocations (Section 4.4, page 33)



- Currently the trawl CV allocation is apportioned into 3 seasons
- These seasonal apportionments were primarily put in place to protect an important Stellar Sea Lion prey species
- Most of the catch occurs in the A season, which also contains the greatest level of participation (Table 4-9, page 34)
- Considering adjustments to the seasons would likely require some level (formal or informal) of protected species consultation

Processor and Community Considerations

(Section 4.5, page 34)

- We provide some background on port/ community activity associated with trawl CVs from the Cod Allocation Review. Figure 4-1 on page 35 and Table 4-10 on page 36 (restricted by confidentially)
 - Communities that have received deliveries of trawl CV cod include Adak, Akutan, Dutch, King Cove, Sand Point, and Anchorage
- A reminder that a LAPP might include elements that promote community/ processor sustained participation to prevent a drastic change in delivery patterns that compromise investments and reliance on the fishery
- Elements might include:
 - Cooperative/ processor linkages
 - Allocation of harvest shares to processors
 - Limiting deliveries to C/P acting as motherships
 - Regionalization
 - Port of landing requirements



Photo credit: NPFMC

AI Pacific Cod Shoreside Sustainability

(Section 4.5.3, page 38)

- Amendment 113 – Section 4.5.3.1 provides a brief overview of AM113 and the March 21, 2019 U.S. District Court for the District of Columbia ruling on the amendment
- AI Pacific cod port-specific or regional landing requirement (details are on pages 39-40)
 - Regional landing requirement would likely work better than a port specific landing requirement (more flexible which could accommodate the addition of new shoreside processors in the AI)
 - Need to determine a set % of non-CDQ BSAI cod trawl CV sector allocation to the AI shoreplants as quota (AM 113 was 5,000 mt)
 - Is the quota specific to a specific time period or entire year (AM113 was Jan 20 to March 21) and whether its AI TAC specific (AM 113 was AI TAC specific)
 - Could include a notification deadline and performance measures in case of no processor or limiting processing
- Allocation of harvester quota to AI shoreplant(s)
- An AI regional fishing associations

Ownership and Use Caps (Section 4.6, page 41)

Ownership and use caps limit consolidation of harvesting privileges and consolidation of harvesting activity.

Types of caps	Description
Ownership caps	Restricting the amount of a harvesting privilege that a person/ entity may hold
Consider:	<ul style="list-style-type: none">• How will ownership caps be calculated?• Will entities be grandfathered in?
Vessel use caps	Restricting the amount of pounds a vessel may harvest within a year
Cooperative caps	Restricting the amount of harvesting privilege/ pounds a cooperative may hold/ use within a year
Processing caps	Restricting the amount of harvesting privilege may be received or processed with one processing company

The Council should also consider whether there is a concern with the potential for BSAI Pacific cod trawl consolidation on AFA vessels.

Sideboard Limits (Section 4.7, page 44)

- Includes background on current sideboards
- Are all the current sideboards still necessary?
 - i.e. AFA sideboards for BSAI Pacific cod trawl CV may no longer be necessary
- Does the Council wish to establish any new sideboards as a result of this action?
 - Are there any fisheries at risk of increased participation as a result of the privileges potentially allocated under this action?
 - Non-AFA and/ or AFA sideboard exempt fisheries in the GOA?
 - Should yellowfin sole sideboards for AFA trawl CV continue and should new limits for non-AFA vessels be created?
 - Would there be any exemptions?

Impacts to Captains and Crew (Section 4.8, page 49)

- General implications of LAPPs for captains and crew members
- Examples of crew provisions in other programs
- Specific to the BSAI Pacific cod trawl CV fishery
 - Depends on level of consolidation that may occur
 - Depends on diversification of the vessels
 - Lack of crew data
 - Cost of entry will likely increase



Photo credit: NPFMC

Bycatch/ PSC Management (Section 4.9, page 52)

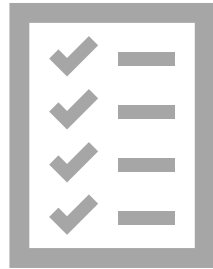
- Analysts were tasked with considering implications for bycatch management
 - LAPP could inherently aid the participants in limiting bycatch through cooperation and communication
 - Council could consider alternatives that specifically target halibut PSC reductions
- Currently:
 - Halibut and crab PSC allocated to the BSAI trawl limited access sector, then to Pacific cod fisheries (trawl CV + trawl C/Ps)
- Under a LAPP:
 - Further apportion out trawl CV halibut and crab PSC (How?)
 - Further choose to apportion by license holder/ cooperative (How?)
 - Halibut Abundance Based Management may play a role
- Limiting groundfish and cod bycatch
 - Sideboards (Section 4.7)
 - MRA – maximum retainable harvest
 - ICA of Pacific cod in other groundfish fisheries



Photo credit: NPFMC

Management and Enforcement

(Section 4.10, page 57)



Elements required for implementation

Cost recovery

Observer coverage

Consideration of enforceability

Program review (highlighted in the MSA requirements)



Optional elements for consideration

Cooperative reports

Economic data collection

LAPP for BSAI Pot CV \geq 60 ft Sector



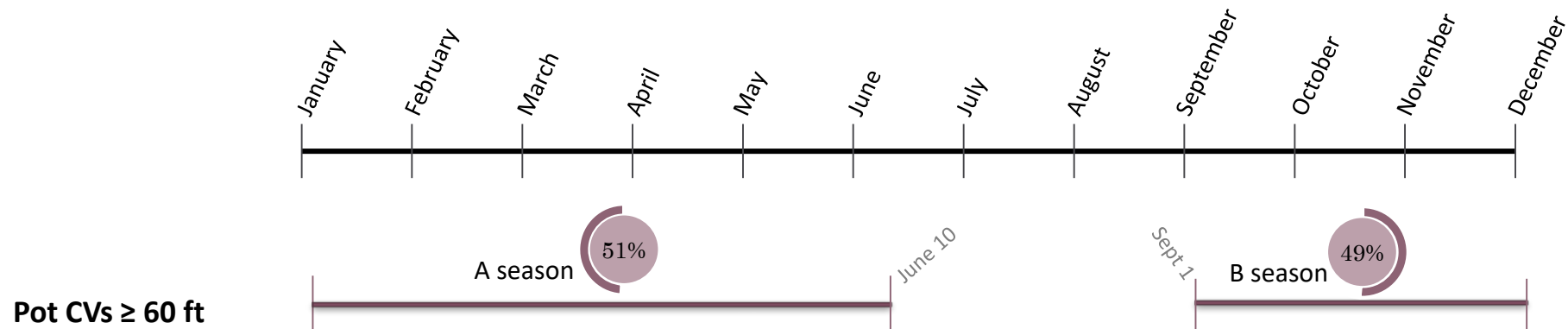
Photo credit: NPFMC

Section 5, page 60

Background

(Section 5.1, page 61)

- 8.4% of the BSAI cod TAC
- Typically does not harvest full allocation (except 2011 and 2018)
- 50 LLP licenses able to be used on vessels ≥ 60 ft in the BS or AI Pacific cod open access pot CV fishery (all have been used between 2003-2018)



LAPP for BSAI Pot CV \geq 60 ft sector

(Section 5-1, page 62)

Reported halibut and crab mortality in the **pot CV** non-CDQ BSAI Pacific cod target fishery

Species	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Halibut mortality (mt)	2	1.65	1.71	0.21	2.23	0.09	1.20	3.29	2.15	0.61	0.43	0.47	0.70	0.62	0.17
Red King crab	408	2,994	3,652	22,733	20,358	1,437	1,069	7,866	1,834	22,430	19,061	19,875	309	8,716	242,567
C. bairdi	25,294	92,528	211,226	430,990	839,641	267,264	198,074	114,981	43,355	62,215	108,234	148,669	48,736	133,249	154,486
C. opilio PSC (COBLZ)	1,000	7,377	7,120	229,603	51,793	6,520	17,333	258	1	0	0	0	0	1,396	25
Other C. opilio	44,602	76,200	189,097	556,794	235,668	61,927	261,829	41,494	7,363	4,744	29,101	35,710	1,334	27,631	2,579

Source: AKFIN, May 2019. Sector_PSC (4-16-19)

LAPP for BSAI Pot CV \geq 60 ft sector

(Table 5-2, page 62)

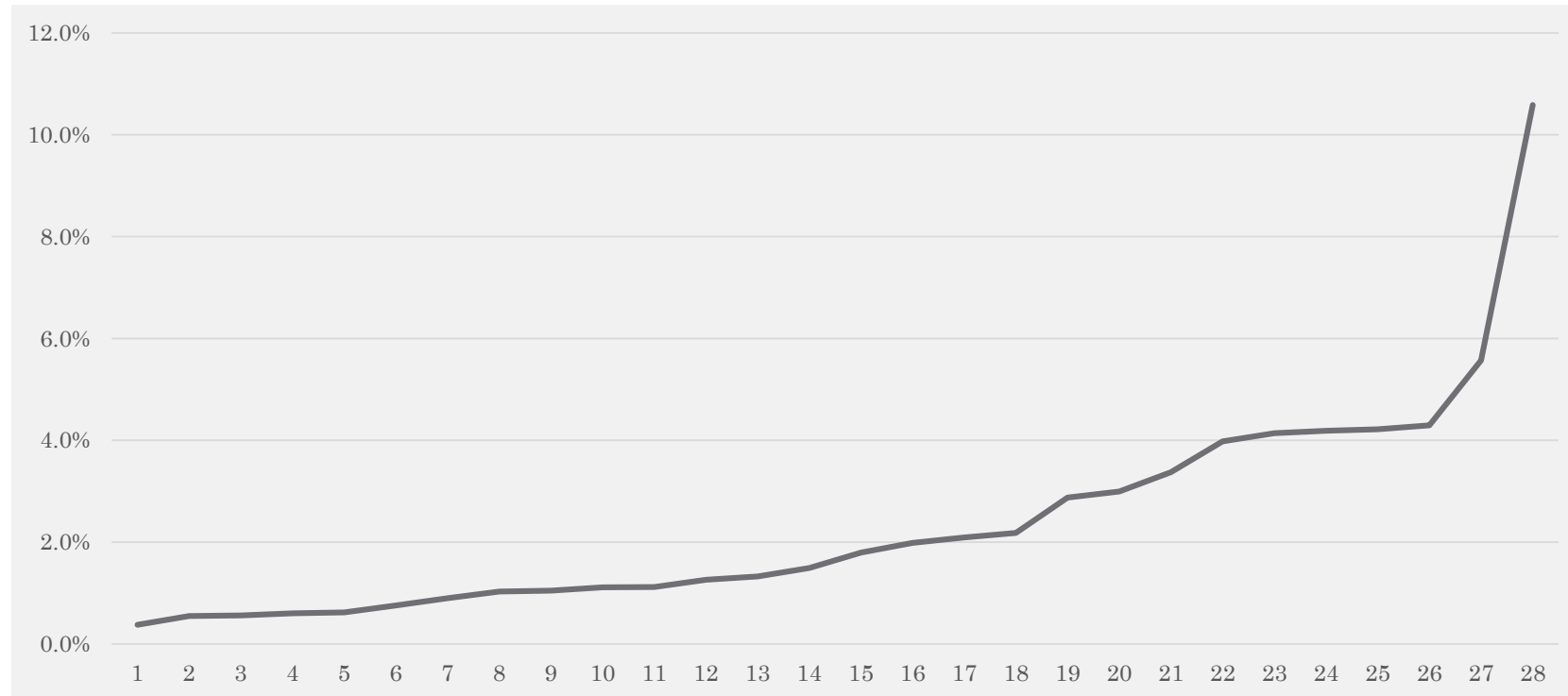
BSAI Pacific cod catch in the Federal Open Access Pacific cod target fishery by CVs \geq 60 ft using pot gear (2003-2018)

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
AI																	
Weight (mt)				*	*											1,282	1,682
LLP Licenses				1	1											3	4
Vessels				4	2											3	8
Processing Plants				2	1											3	5
BS																	
Weight (mt)	14,448	10,568	11,522	*	*	11,227	6,476	11,589	16,404	12,721	12,436	11,136	10,408	11,028	13,725	13,952	191,603
LLP Licenses	36	39	37	40	42	41	26	30	36	33	33	33	25	27	36	34	49
Vessels	54	53	45	45	45	41	26	30	33	29	31	31	23	25	34	31	83
Processing Plants	10	11	10	14	10	10	9	8	9	7	8	8	8	9	8	8	26
Total																	
Weight (mt)	14,448	10,568	11,522	12,843	11,521	11,227	6,476	11,589	16,404	12,721	12,436	11,136	10,408	11,028	13,725	15,234	193,285
LLP Licenses	36	39	37	40	42	41	26	30	36	33	33	33	25	27	36	37	50
Vessels	54	53	45	49	46	41	26	30	33	29	31	31	23	25	34	34	88
Processing Plants	10	11	10	15	10	10	9	8	9	7	8	8	8	9	8	9	28

LAPP for BSAI Pot CV \geq 60 ft sector

(Figure 5-1, page 63)

Percentage of 2010 through 2018 pot CV \geq 60 ft catch of target Pacific cod by LLP holder's address



Note: The four smallest and largest amounts were averaged to protect confidential information.

LAPP for BSAI Pot CV \geq 60 ft sector

(Table 5-3, page 64)

LLP licenses on pot CVs \geq 60 ft by Pacific cod pot endorsement and Crab Rationalization sideboard limits

Pcod Endorsements	CR GOA Sideboarded	CR GOA Sideboarded - except Pcod	CR GOA Sideboarded - no GOA Pcod Fishing	No CR Sideboard	Total
AI CV Pot				1	1
AI CV Pot; BS CV Pot				1	1
AI CV Pot; BS CV Pot; WG CV Pot	1				1
BS CV Pot	4			28	32
BS CV Pot; BS CV HAL; CG CV Pot	1				1
BS CV Pot; CG CV Pot	2				2
BS CV Pot; WG CV Pot	6	1	2	1	10
BS CV Pot; WG CV Pot; CG CV Pot		2			2
Total	14	3	2	31	50

Impacts of Proposed LAPP on Other Sectors



Photo credit: NPFMC

Section 6, page 65

Inseason Rollovers of Pacific Cod to Other Sectors (Table 6-1, page 65)

BSAI non-CDQ Pacific cod sector apportionment and BSAI non-CDQ Pacific cod seasonal allowance for 2019

Sector	BSAI Sector Apportionment (mt)	BSAI Season allowance (mt)		
		A	B	C
H&L/pot < 60'	3,109	No seasonal allowance		
H&L CV ≥ 60'	311	159	152	
H&I CP	75,705	38,610	37,095	
Pot CV ≥ 60'	13,058	6,660	6,398	
Pot CP	2,332	1,189	1,143	
Sector	BSAI Sector Apportionment (mt)	BSAI Season allowance (mt)		
Jig vessels	2,186	1,311	437	437
AFA trawl CP	3,591	2,693	898	0
Amendment 80	20,919	15,689	5,230	0
Trawl CV	34,500	25,530	3,795	5,175

Inseason Rollovers of Pacific Cod

(Table 6-2, page 66)

**HAL/pot CV <60 ft BSAI
Pacific cod sector allocations**

Year	Total TAC	Initial Allocation		After Reallocations		
		mt	% of non-CDQ TAC	mt	Change (mt)	% of non-CDQ TAC
1995	250,000	NA	NA	NA		NA
1996	270,000	NA	NA	NA		NA
1997	270,000	NA	NA	NA		NA
1998	210,000	NA	NA	NA		NA
1999	177,000	NA	NA	NA		NA
2000	193,000	1,268	0.7%	1,230	-38	0.7%
2001	188,000	1,235	0.7%	1,235	0	0.7%
2002	200,000	1,314	0.7%	1,314	0	0.7%
2003	207,500	1,363	0.7%	1,363	0	0.7%
2004	215,500	1,416	0.7%	2,961	1,545	1.5%
2005	206,000	1,354	0.7%	2,601	1,247	1.4%
2006	189,768	1,246	0.7%	3,242	1,996	1.9%
2007	170,720	1,121	0.7%	2,928	1,807	1.9%
2008	170,720	3,033	2.0%	5,210	2,177	3.4%
2009	176,540	3,137	2.0%	4,434	1,297	2.8%
2010	168,780	2,998	2.0%	5,509	2,511	3.7%
2011	227,950	4,055	2.0%	9,005	4,950	4.4%
2012	261,000	4,645	2.0%	8,880	4,235	3.8%
2013	260,000	4,627	2.0%	9,177	4,550	4.0%
2014	253,894	4,518	2.0%	12,018	7,500	5.3%
2015	249,422	4,438	2.0%	10,630	6,192	4.8%
2016	251,519	4,476	2.0%	10,674	6,198	4.8%
2017	239,399	4,259	2.0%	9,271	5,012	4.3%
2018	203,831	3,627	2.0%	8,748	5,121	4.8%

HAL/pot CV < 60 ft Sector (Table 6-3, page 67)

HAL/pot CV < 60 ft sector BSAI Pacific cod harvest and final sector allocation 2003 through 2018

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Reported Harvest (mt)	1,371	2,560	2,119	3,294	3,132	4,297	4,040	5,159	7,563	8,304	8,456	10,293	9,304	10,301	9,880	7,735	97,807
Final Allocation (mt)	1,363	2,961	2,601	3,242	2,928	5,210	4,434	5,509	9,005	8,880	9,177	12,018	10,630	10,674	9,271	8,748	106,651
% harvested	101%	86%	81%	102%	107%	82%	91%	94%	84%	94%	92%	86%	88%	97%	107%	88%	92%
Vessels	7	11	12	16	16	15	15	14	15	19	21	15	21	21	22	26	66

Inseason Rollovers of Pacific Cod to Other Sectors (Section 6, page 68-69)

Potential impacts of trawl and pot CV LAPPs on reallocations

- Moving to a cooperative program could reduce reallocations
 - Cooperatives could lead to better cooperation to efficiently harvest the cod allocation
 - Will likely depend on the structure of the LAPPs; for example if trawl CV C-season remains open access, there is likely greater chance of reallocations
 - LAPP could include an option to reallocate available cod with cooperatives finish their fishing (when season closes or when cooperatives check out of fishing).
 - Reallocations would likely be later than currently, which would limit the ability of the harvesting all of the reallocation, if any.

Conclusions and Next Steps

(Section 7, page 70)

If the Council determines the consideration of BSAI Pacific cod LAPP(s) continue to be warranted...

Trawl CV LAPP

- Use the structural questions throughout the document to further clarify program structure
- Use the structural questions to help identify alternatives and options for further consideration

Pot CV LAPP for vessels \geq 60 ft LOA

- Identify the purpose and need
- Identify alternatives and options using Section 5 as well as context from the rest of the document, OR
- Provide direction for continued discussion

Both

- Determine whether these actions will continue to be considered together

Questions?



Photo credit: NPFMC

Allocation Decisions (Table 4-1, page 27)

Annual % of BSAI Pacific cod discarded from AFA trawl CVs, non-AFA trawl CVs, and pot CVs

CV group	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
AFA trawl CVs	0.6%	0.7%	0.3%	0.8%	1.3%	0.1%	0.6%	0.6%	0.2%	0.1%	0.2%	0.4%	0.0%	0.3%	0.4%	0.3%
Non-AFA CVs	1.1%	0.3%	0.3%	0.8%	1.1%	0.0%	1.7%	0.2%	0.3%	1.0%	0.6%	0.4%	1.0%	0.3%	4.5%	1.1%
Pot CVs	0.9%	0.3%	0.4%	0.5%	0.4%	1.0%	0.1%	0.0%	0.0%	0.1%	0.1%	0.3%	0.1%	0.1%	0.0%	0.3%

Source: AKFIN summary of CAS data (BSAI_PCOD_R_D(7-9-2019))

Allocation Decisions (Table 4-2, page 27)

Targeted Pacific cod catch reported with the LLP license field blank

Weight/Vessels	2003	2004	2005	2006	2007	2008	2009	2010	2012	2015	2016	2017	2018	Total
AI														
Weight (mt)	6,073	2,060	506	1,561	712	550	738	828	225		*		1,190	14,682
Vessels	15	7	4	10	12	10	9	5	3		2		6	30
BS														
Weight (mt)	140	*	*						*	*	*	*		1,037
Vessels	6	2	1						1	1	1	1		11
Total														
Total Weight (mt)	6,213	*	*	1,561	712	550	738	828	*	*	409	*	1,190	15,718
Total Vessels	19	9	5	10	12	10	9	5	4	1	3	1	6	39

Allocation Decisions (Table 4-4, page 29)

Pacific cod	Vessel	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Years
	AJ	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	11
	ALASKAN COMMAND	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	Black	Black	Black	Black	8
*	ALASKAN DEFENDER	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	4
	AMERICAN CHALLENGER	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	14
*	ARCTIC RAM	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	Black	Black	Black	Black	7
*	BERING DEFENDER	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	8
	BLUE FOX	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	White	White	White	9
	DEFENDER	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	4
	DONA MARTITA	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	7
*	EXODUS EXPLORER	Black	Black	Black	Black	Black	White	White	White	White	White	White	White	White	White	White	5
	GUN-MAR	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	11
	HAZEL LORRAINE	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	White	White	White	White	8
*	INTREPID EXPLORER	Black	Black	Black	Black	Black	Black	White	White	White	White	White	White	White	White	White	6
*	MARGUN	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	13
	MARGUN	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	2
	MORNING STAR	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	14
	MORNING STAR	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	13
*	MS AMY	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	White	White	10
	NORDIC EXPLORER	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	White	White	White	White	8
	NORTHERN DEFENDER	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	2
*	NORTHERN RAM	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	6
	PACIFIC KNIGHT	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	8
	PACIFIC MONARCH	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	White	White	White	White	7
*	PATRICIA L	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	5
*	PEGGY JO	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	13
	POSEIDON	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	White	White	White	White	White	10
	PREDATOR	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	14
*	TRACY ANNE	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	Black	9

AFA CV vessels that did not hold an AFA inshore permit (white cells) in all years from trawl CV Pacific cod catch

Allocation Decisions (Table 4-5, page 30)

Trawl CV sector targeted Pacific cod catch by non-AFA, AFA BSAI cod exempt, and AFA BSAI cod non-exempt vessels

Trawl CVs	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Metric Tons																	
Non-AFA	3,173	1,661	1,547	1,568	1,714	3,755	3,776	4,219	7,695	7,066	6,832	6,136	7,874	7,000	6,642	6,868	77,526
AFA non-BSAI Pacific cod exempt	23,561	24,179	20,676	21,429	20,272	18,452	14,372	13,349	17,005	22,025	22,260	23,641	15,008	24,128	23,087	21,219	324,666
AFA Pacific cod exempt	7,016	9,245	8,157	7,882	6,452	5,333	7,018	7,191	9,923	11,442	9,882	9,344	8,816	10,180	7,358	4,432	129,672
Grand Total	33,750	35,086	30,381	30,880	28,439	27,540	25,166	24,759	34,622	40,533	38,974	39,122	31,698	41,308	37,087	32,519	531,863
Percentage																	
Non-AFA	9.4%	4.7%	5.1%	5.1%	6.0%	13.6%	15.0%	17.0%	22.2%	17.4%	17.5%	15.7%	24.8%	16.9%	17.9%	21.1%	14.6%
AFA BSAI Pacific cod non-exempt	69.8%	68.9%	68.1%	69.4%	71.3%	67.0%	57.1%	53.9%	49.1%	54.3%	57.1%	60.4%	47.3%	58.4%	62.3%	65.3%	61.0%
AFA Pacific cod exempt	20.8%	26.4%	26.9%	25.5%	22.7%	19.4%	27.9%	29.0%	28.7%	28.2%	25.4%	23.9%	27.8%	24.6%	19.8%	13.6%	24.4%
Grand Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Allocation Decisions (Table 4-6, page 30)

Targeted and incidental catch of Pacific cod in the trawl CV sector

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Pacific Cod																	
Landed Catch (mt)	33,750	35,086	30,381	30,880	28,439	27,540	25,166	24,759	34,622	40,533	38,974	39,122	31,698	41,308	37,087	32,519	531,863
Landed Catch (%)	90.8%	90.7%	86.6%	89.1%	91.0%	89.5%	87.3%	89.7%	87.1%	86.3%	89.4%	92.5%	84.3%	91.8%	86.8%	89.1%	88.9%
LLP Licenses	71	71	63	58	60	63	48	45	51	58	56	53	52	60	64	66	109
Vessels	70	68	59	54	57	61	46	44	50	54	53	48	47	56	60	60	102
Processing Plants	10	13	12	11	12	14	10	8	13	11	12	10	11	17	17	19	41
Other Species																	
Landed Catch (mt)	3,439	3,610	4,705	3,791	2,806	3,226	3,663	2,853	5,124	6,453	4,635	3,151	5,898	3,710	5,656	3,967	66,687
Landed Catch (%)	9.2%	9.3%	13.4%	10.9%	9.0%	10.5%	12.7%	10.3%	12.9%	13.7%	10.6%	7.5%	15.7%	8.2%	13.2%	10.9%	11.1%
LLP Licenses	95	94	95	90	94	93	93	94	92	95	93	96	96	99	97	98	115
Vessels	91	92	91	87	91	90	90	91	89	92	88	90	89	92	91	89	107
Processing Plants	12	14	12	13	11	13	11	12	11	11	11	11	16	18	16	19	38
Total																	
Landed Catch (mt)	37,189	38,695	35,086	34,670	31,244	30,766	28,830	27,612	39,746	46,987	43,609	42,273	37,596	45,017	42,742	36,486	598,550
Landed Catch (%)	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
LLP Licenses	112	109	109	106	110	109	107	103	107	109	107	104	105	107	107	109	130
Vessels	107	105	104	101	105	104	102	99	104	104	101	98	98	100	101	99	124
Processing Plants	17	19	18	16	16	20	15	13	17	16	16	15	20	22	21	23	50

Allocation Decisions (Table 4-8, page 32)

BSAI non-CDQ targeted trawl CV Pacific cod catch by number of LLP licenses associated with the catch

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
1 LLP license												
Pacific cod (mt)	27,685	25,223	25,527	34,598	39,371	37,703	38,061	27,175	37,781	33,871	31,333	358,328
Pacific cod (%)	98.6%	97.4%	99.8%	99.9%	96.5%	96.7%	97.3%	85.6%	90.6%	90.0%	93.0%	94.8%
2 LLP licenses												
Pacific cod (mt)	405	681	60	24	1,426	1,271	1,060	4,566	3,935	3,770	2,376	19,575
Pacific cod (%)	1.4%	2.6%	0.2%	0.1%	3.5%	3.3%	2.7%	14.4%	9.4%	10.0%	7.0%	5.2%
Vessels	2	2	1	1	3	2	5	5	4	4	6	10
LLP licenses	4	4	2	2	6	4	10	10	8	8	12	21
Total (mt)	28,090	25,904	25,587	34,622	40,797	38,974	39,122	31,741	41,716	37,641	33,709	377,904

LAPP for BSAI Pot CV \geq 60 ft sector

(Section 5-1, page 62)

Reported halibut and crab mortality in the **pot CV** non-CDQ BSAI Pacific cod target fishery

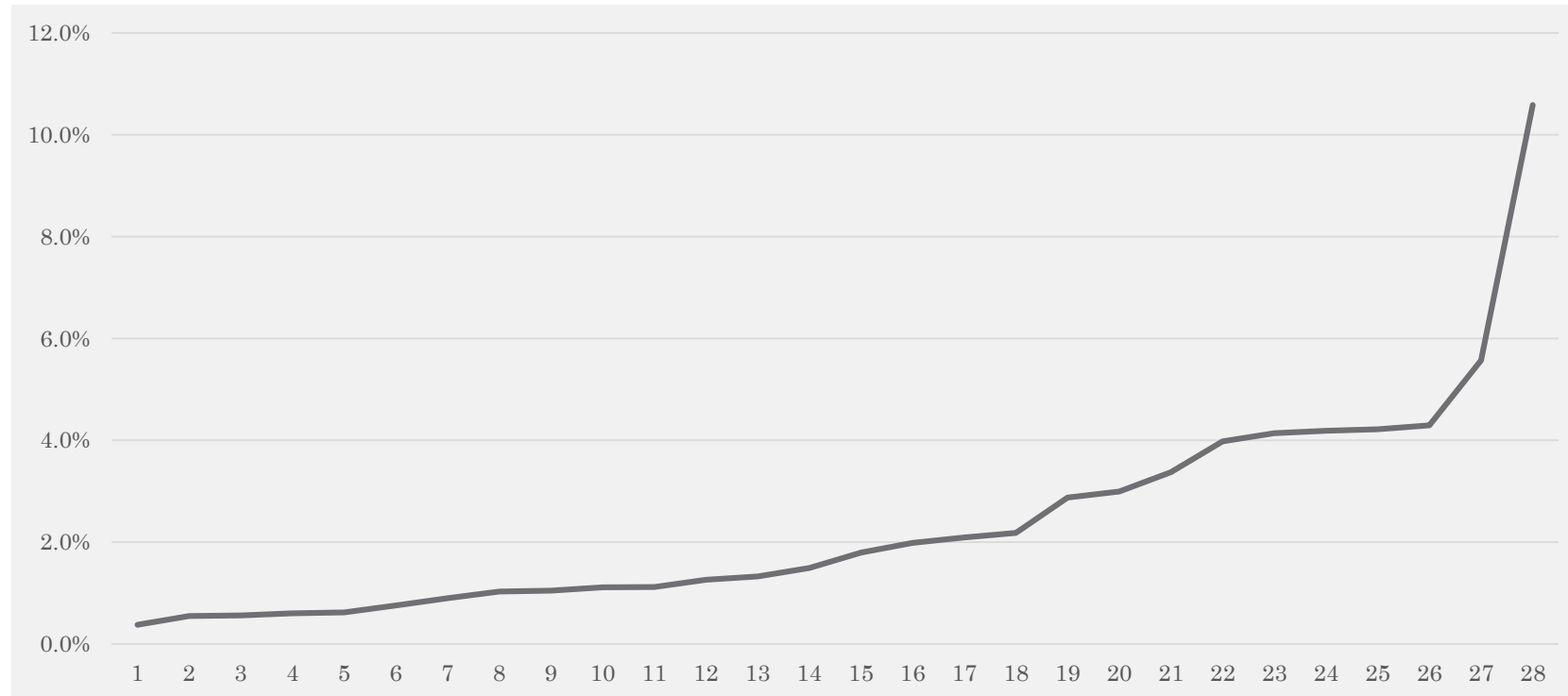
Species	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Halibut mortality (mt)	2	1.65	1.71	0.21	2.23	0.09	1.20	3.29	2.15	0.61	0.43	0.47	0.70	0.62	0.17
Red King crab	408	2,994	3,652	22,733	20,358	1,437	1,069	7,866	1,834	22,430	19,061	19,875	309	8,716	242,567
C. bairdi	25,294	92,528	211,226	430,990	839,641	267,264	198,074	114,981	43,355	62,215	108,234	148,669	48,736	133,249	154,486
C. opilio PSC (COBLZ)	1,000	7,377	7,120	229,603	51,793	6,520	17,333	258	1	0	0	0	0	1,396	25
Other C. opilio	44,602	76,200	189,097	556,794	235,668	61,927	261,829	41,494	7,363	4,744	29,101	35,710	1,334	27,631	2,579

Source: AKFIN, May 2019. Sector_PSC (4-16-19)

LAPP for BSAI Pot CV \geq 60 ft sector

(Figure 5-1, page 63)

Percentage of 2010 through 2018 pot CV \geq 60 ft catch of target Pacific cod by LLP holder's address



Note: The four smallest and largest amounts were averaged to protect confidential information.

LAPP for BSAI Pot CV \geq 60 ft sector

(Table 5-3, page 64)

LLP licenses on pot CVs \geq 60 ft by Pacific cod pot endorsement and Crab Rationalization sideboard limits

Pcod Endorsements	CR GOA Sideboarded	CR GOA Sideboarded - except Pcod	CR GOA Sideboarded - no GOA Pcod Fishing	No CR Sideboard	Total
AI CV Pot				1	1
AI CV Pot; BS CV Pot				1	1
AI CV Pot; BS CV Pot; WG CV Pot	1				1
BS CV Pot	4			28	32
BS CV Pot; BS CV HAL; CG CV Pot	1				1
BS CV Pot; CG CV Pot	2				2
BS CV Pot; WG CV Pot	6	1	2	1	10
BS CV Pot; WG CV Pot; CG CV Pot		2			2
Total	14	3	2	31	50