

North Pacific Fishery Management Council

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ADVISORY PANEL MINUTES October 3–7, 2017 Anchorage, AK

The following members were present for all or part of the meetings (absent ~~stricken~~):

Carroll, Shannon	Gruver, John	Peterson, Joel
Christiansen, Ruth	Kauffman, Jeff	Scoblic, John
Cochran, Kurt	Kwachka, Alexis	Stephan, Jeff
Crowley, John	Lowenberg, Craig	Stevens, Ben
Donich, Daniel	McCallum, Chuck	Upton, Matt (Co-Vice Chair)
Downing, Jerry	Nichols, Carina	Weiss, Ernie (Chair)
Drobnica, Angel (Co-Vice Chair)	O'Donnell, Paddy	Wilt, Sinclair

The AP approved the minutes from the June 2017 meeting.

C1 Charter Halibut Permit Registration

The AP recommends the Council release the analysis for public review.

The alternatives are shown below, with the AP's preliminary preferred alternative in **bold and with an additional option added (Option 4)**:

Alternative 1. Status Quo

Alternative 2. Implement an annual registration process for transferable and non-transferable charter halibut permits (CHP). A CHP holder must submit the following information to NMFS on an annual basis to register a CHP:

- **CHP number,**
- **CHP holder name (individual or non-individual entity), and**
- **CHP holder address.**

If a CHP is not registered with NMFS, the CHP would not be valid for use during the applicable fishing year.

Options for additional requirements could include (options are not mutually exclusive):

Option 1. CHP ownership (e.g., ownership holdings for the CHP by individual(s), partners, or a corporate entity).

Option 2. Natural person(s) and/or vessel(s) that will use the permit.

Sub-option: If a non-transferable CHP is used by a natural person(s) and/or vessel(s) that was not submitted to NMFS during the annual registration, the CHP would not be valid for use during the following fishing year.

Option 3. For non-transferable permits, the CHP holder must notify NMFS where the permit will be used (i.e., the beginning and/or ending port(s) to trips where the CHP is used.

Sub-option: If a non-transferable CHP is used for a trip that begins or ends in a port that was not submitted to NMFS during the annual registration, the CHP would not be valid for use during the following year.

Option 4. CHP use as indicated by answering the following questions:

- 1) In the last year, was this CHP used by an operator who is not part of the CHP ownership structure?
- 2) If yes, what were the agreed upon compensation terms for the use of the CHP?
 - a. No compensation; operator is an employee of the CHP holder
 - b. A flat fee of \$___ paid to the permit holder
 - c. A fee that is a percentage of gross earnings, ___%
 - d. Combination of flat fee and percentage, the flat fee \$___ and percentage ___%
 - e. Other? Explain: _____

Motion to amend Option 4 with ~~strikeouts~~ passed 20-0.

Motion to amend adding following sentence, passed 16-4.

The AP recommends that a CHP fee be established for the CHP Program, and the mechanism for administering the CHP fee would parallel the mechanism that is utilized in the Observer Program. Motion to amend striking last phrase, passed 20-0.

The final motion as amended passed 20-0.

Rationale in Support:

- A fee structure should be investigated to cover the administrative costs associated with a new annual registration

Rationale Against:

- NMFS has the discretion to establish a fee upon a program as they see fit so inclusion of this specific request is unnecessary.
- The analyst noted that discussion on a fee had been previously investigated and included in earlier draft papers. The concept was not carried forward in this version of the analysis.
- Including this specific request would be more appropriate as part of an initial review analysis, but is inconsistent with the main motion that moves the analysis forward for public review.

Rationale in Support of Main Motion:

- Alternative 2 is consistent with the Council's goal to increase understanding on the usage, ownership and leasing behaviors of the CHP program.
- Alternative 2 would provide a systematic process for updating CHP holder information for transferable and non-transferable CHPs, improve understanding of latent capacity and improve enforcement on the water.

- Option 1 was selected as part of the PPA because it is more in line with current business models used in the program and is responsive to the realities of unforeseen mid-season changes in operators, vessels and ports. Options 2 and 3 could prove unnecessarily burdensome and/or pose compliance issues.
- The inclusion of Option 4 is necessary to provide the Council with improved information on CHP leasing activity of transferable and non-transferable permits and balances relevant information that may inform future management decisions with minimizing the burden on permittees of providing specifics on financial arrangements.
- Establishing an annual registration would enable the Council to begin gathering information that could potentially inform program changes in the future.

During discussions, the following motion to amend failed 10-10:

The AP recommends that Alternative 2, Sub-option 1 should be expanded to include information on foreign ownership to help comply with existing restrictions on foreign ownership (50CFR300.67 (i)(2)(i).

Rationale in Support: Including a requirement regarding foreign ownership of CHPs in a new annual registration process is a reasonable provision to ensure program compliance with MSA requirements.

Rationale Against: Including a requirement regarding foreign ownership of CHPs in a new annual registration process is redundant and already required through NMFS.

C2 Mixing of Guided and Unguided Halibut

The AP recommends the Council release the analysis for public review after the addition of the following:

1. An expanded discussion of the changes in guided and unguided halibut fishery management measures that led to an increase in multi-day, mothership and floating lodge operations and increasing potential for mixing halibut caught by guided and unguided anglers.
2. An expanded discussion of the regulatory history of current prohibitions on mixing halibut in the commercial, subsistence, and sport fisheries.
3. Available information on the recently identified sample of mothership and floating lodge sport halibut operations in areas 2C and 3A (i.e., number of operations identified, description of services offered, whether operation holds CHPs, etc.)

Motion passed 20-0.

Rationale:

- Additional information is needed to help the Council, AP and the public better understand the purpose and need for the proposed action. Specifically, it would be helpful to have more background on the distinctions between unguided and guided regulations and how regulatory changes have influenced the evolution of business development in the sectors.
- An increased understanding of the rationale behind current regulations that prohibit mixing in the subsistence, commercial and sport fisheries may help inform future management decisions.

- As discussed in the staff presentation, new information is available for multi-day trip, mothership and floating lodge operations in areas 2C and 3A. The inclusion of this data will help the Council better understand the types of services being provided and the potential scope of the problem regarding mixing of halibut.

C3 BSAI Crab Specifications for 6 Stocks and SAFE

The AP recommends the Council adopt the 2017 Crab SAFE Report and the 2017 and 2018 OFL and ABC recommendations by the Crab Plan Team and the SSC.

Motion passed 20-0.

C4 Groundfish Harvest Specifications

Gulf of Alaska Groundfish

The AP recommends the Council adopt the proposed 2018 and 2019 Gulf of Alaska groundfish specifications for OFLs and ABCs as recommended by the SSC, and set TACs as shown in the **attached table**. The TACs for both Gulf of Alaska Pacific cod and Pollock have been adjusted to account for the State water GHL fisheries. The GOA Pacific cod adjustments are shown in the **attached table** provided by staff (revised C4 item 6). *Motion passed 19-0.*

The AP recommends that the Council set the proposed 2018 and 2019 annual and seasonal Pacific halibut PSC limits and apportionments in the GOA as provided in Tables 9, 10 and 11 (C4 item 7). *Motion passed 19-0.*

The AP recommends that the Council adopt the updated halibut DMRs for both the BSAI and the GOA for 2018 and 2019 as shown in Table 1 (C4 item 8). *Motion passed 19-0*

The AP recommends the Council write a letter to NMFS and ask that all three of the survey vessels be used for the Gulf of Alaska surveys. *Motion passed 20-0.*

Rationale: The AP is concerned about alarming reductions in recent P. Cod assessments and believes that survey reductions in the GOA could lead to data quality issues.

Bering Sea and Aleutian Islands Groundfish

The AP recommends the Council adopt Table 8 (C4 item 4a), the proposed 2018 and 2019 apportionments of PSC catch allowances in the BSAI. *Motion passed 19-0.*

The AP recommends the Council adopt Table 10 (C4 item 4c), proposed 2018 and 2019 prohibited species bycatch allowances for the BSAI trawl limited access sector. *Motion passed 20-0.*

The AP recommends the Council adopt the flatfish ABC reserves as the difference between the ABC and the TACs. *Motion passed 20-0.*

The AP recommends the Council adopt the proposed 2018 and 2019 OFLs, ABCs, and TACs as shown in the **attached table** for groundfish in the Bering Sea and Aleutian Islands. *Motion passed 20-0.*

C5 Observer tendering issue; low sampling rates

Biased sampling from tendering

The AP recommends the Council adopt the OAC recommendation to initiate a regulatory analysis of Option 2a and 2b to change the definition of a tender trip so that either delivery starts a new trip, or a tender trip may constitute no more than a maximum number of deliveries. The OAC recommends that the analysis should evaluate allowing observers to deploy from tender vessels and that a secondary objective of the action is to provide relief to vessels that otherwise are required to have an observer onboard a small vessel for long periods while the vessel is making use of a tender.

Motion passed 20-0.

Rationale: This action is consistent with previous expressed concerns and recommendations from the AP and is a refinement of the Council's tabled observer tender analysis that received preliminary evaluation in 2015 and 2016.

Chinook sampling in the GOA pollock fisheries

The AP recommends the Observer Advisory Committee recommendation regarding Chinook salmon sampling in the GOA pollock fisheries; Option 1, to monitor off loads at the plant and require EM on trawl vessels to ensure there are no discards. *Motion passed 20-0.*

Rationale: Trawl catcher vessels and tenders delivering pollock to a shoreside plant should have their catch monitored. This action is consistent with concerns expressed by the AP in the past as well as the SSC and Observer Advisory Committee. The above action is based on the OAC discussion and work paper from their September 2017 meeting and recommendations.

Low Sampling Rate discussion paper

The AP recommends that the Council request the OAC subgroup to continue to develop options on low sampling rates. *Motion passed 18-1.*

Rationale: The subgroup has identified the need to continue to work on reference points and define objectives before directing changes in coverage rates or any associated fee structure changes.

C6 2018 Observer Annual Deployment Plan

2018 ADP

The AP recommends that the Council adopt the NMFS recommendations for the 2018 Annual Deployment Plan for observers in the Groundfish and Halibut Fisheries off Alaska as outlined on page 4 and 5 of the report with three exceptions:

1. For sampling strata for 2018: drop the H&L vessels greater or equal to 40 ft delivering to tenders and Pot vessels greater or equal to 40 ft delivering to tenders as recommended by the OAC.
2. For the allocation strategy, evaluate two different approaches in the final ADP: the NMFS recommended approach of 15% plus optimization based on groundfish discards and halibut and Chinook PSC and the OAC recommended optimization approach based on groundfish discards and halibut PSC. The agency should consider which allocation strategy will best

balance groundfish discard and halibut PSC optimization along with data needed for the Pacific cod stock assessments.

3. Because of the changes in the Pacific cod stocks it is premature to pick selection rates at this time.

Motion passed 20-0.

Rationale:

- A 4% coverage observer coverage rate for the pot strata recommended by the OAC may not be adequate for Pacific cod in the GOA considering its declining status. While the AP recognizes time constraints in conducting new analyses on selection rates, it would be beneficial to understand the affects this new stock information may have before recommending preferred selection rates.
- The low number of trips in the hook and line and pot tender strata may provide insufficient, representative data for program goals. Challenges with vessels predicting their delivery mode and the potential for resulting penalties does not outweigh the limited benefit of maintaining these strata.

Other OAC recommendations

The AP recommends that the Council adopt the other OAC recommendations in their report. We wish to highlight the following:

- The OAC recommendation that the June Annual report separate the HAL and POT components of the EM strata for evaluation metrics, and track dockside sampling of P Cod for its sufficiency in providing needed dockside samples.
- The OAC recommendations regarding reclassifying ~~for longline a higher coverage rate on~~ sablefish pot vessels. [*Motion to strike passed 20-0.*]
- The OAC recommendation to continued development of a gear specific hurdle approach using Catch Accounting system gear/area definitions. This is similar to what was used in Supplemental EA, but should focus more on “core” areas where partial coverage vessels comprise a significant part of the catch and discards, or areas where using “borrowed data” causes a significant effect.
- The OAC recommendation that ODDS be reprogrammed to allow vessels to be in the EM pool for fixed gear and in the observer pool for trawl gear in the same year.

Rationale:

- Separating HAL and POT vessels in the June report on the EM strata is necessary to support a meaningful observer effects test.
- The sablefish pot fishery is new and information is needed on size composition of the catch and on discards
- Higher coverage on sablefish pots should not trigger higher coverage for pots as a whole; there are 113 pot vessels and only around 17 vessels fishing sablefish pots
- A hurdle approach has merit, however given the different complexities and catch accounting needs of the POT, HAL, and TWL strata, a different hurdle for each may be warranted.

Motion as amended passed 20-0.

2019 ADP

The AP recommends that the Council not support the draft 2018 ADP recommendation to require 100% coverage on EM boats in 2019 with 30% post trip selection. ~~Additional information needs to be collected as recommended by the OAC first.~~ [Motion to strike passed 19-0.]
Motion as amended passed 20-0.

Rationale:

- Pot vessels must slow handling procedures down on EM observed trips; 100% coverage will have operational costs
- Maintaining 100% operation of EM systems will have operational and field costs
- The annual review process has provisions to detect for observer effect and provide options for Council if detected. The agency's recommendation for 100% coverage comes before a problem has been detected
- 100% coverage is counter to the Council's direction that EM responsibilities be comparable to observed vessels
- EM is voluntary and 100% coverage will likely prevent the EM program from achieving a desired scale and cost efficiency needed to improve at-sea monitoring

Observer Program Statements of Work (SOW)

The AP supports the OAC request that the agency explore whether there are other observer services procurement models in operation between NMFS and the PSMFC which could provide more flexibility to allow market incentives to affect cost efficiency; an assessment of whether they would simply shift costs or whether they would be likely to provide overall cost savings; and whether they could legally be used for the Alaska partial coverage program.

The AP supports the OAC recommendation that the Council submit comments to AGO that reflect the combined comments of the OAC and the EM Workgroup. The AP highlights their recommendation that the EM contract proposed SOW needs to:

- Revise the SOW to clearly distinguish between Contractor services desired to support the operational EM fleet to be paid for using industry fees, from Contractor support for R&D work to develop and test new technologies. Contractor support for R&D work should be expressed as options in the contract.
- Reaffirm Council commitment to the new technology vetting process described in original EM analysis and change Section 3.4, of the Draft EM SOW to remove requirement that contractor replacement EM equipment support machine vision functionality being developed by NMFS until that technology has undergone the vetting process.
- Revise Section 4 Field service requirements to clearly describe support services provided by the contractor that will be part of the annual per vessel cost unit, and optional services that the vessel owner must pay for.
- Clarify distinction between Primary vs. Secondary ports—Primary ports would have EM technician services offered frequent throughout the fishing year as needed; secondary ports would have EM technician services offered on more limited scheduled trips.
- Identify costing units that include:
 - Existing EM vessels: Field services and support for vessels in the operational EM program with an EM system installed and an approved VMP that has successfully produced high quality data from at least one EM selected trip.

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- New Vessels: Field services and support for a new vessel in the operational EM program during the first year; thereafter these vessels would be considered existing vessels.
- EM Hardware: Provision of standard camera EM equipment replacement parts at ~~actual~~ **reasonable** costs.
- Field service repair for VMP listed issues—billed at ~~actual~~ **reasonable** travel and labor costs.
- Optional Services: Services such as owner requested add-on capabilities (engine room cameras), optional spare parts or technician work that would be billed to vessel owner ~~as actual~~ **at reasonable** costs.

[Motion replacing actual with reasonable, passed 20-0.]

- **The AP further recommends that the final SOW not foreclose the option of “local” EM data review if it appears this could result in cost and service efficiencies.**

[Motion to add final bullet passed 20-0.]

The AP supports the OAC recommendation that the Council request NMFS and AGO to provide a revised Statement of Work for the EM component only, for additional comment before it is finalized, as long as this does not result in reducing the schedule to the minimum solicitation period.

Final motion as amended passed 20-0.

Rationale:

- The statement of work is very open ended and does not clearly specify what would be covered by the observer program. As is, this potential contract is not consistent with the Council’s policies on improving cost efficiencies.
- New technology and innovations are welcomed in the program, however there are several cost identification clarifications needed to more clearly define potential implications.
- The AP supports the OAC recommendation that the Council request NMFS and AGO to provide a revised Statement of Work for the EM component only, and solicit additional comment before it is finalized, if the minimum solicitation period schedule can be maintained.
- The OAC noted that the EM SOW seems like a first draft and it is not clear on the competencies that would be required from a bidder. The OAC recognized time constraints, but expressed that they would like to review a more refined draft of the EM SOW.
- It is challenging for providers to determine contract costs with such high levels of uncertainty in the SOW. Clarifying the items listed in the OAC recommendations will help offer a more accurate cost analysis/prediction .
- The change in language from ‘actual’ to ‘reasonable’ was made in an attempt to keep the base bids as closely comparable as possible.

C7 CGOA Rockfish Program Review

The AP recommends the Council approve the document and release it to the public.

Motion passed 19-1.

Rationale in Support:

- The rockfish program continues to meet the goals identified.
- The document is thorough and the AP doesn't want to let the new allocation review slow down the review process and release to the public.

Rationale Against:

- Analysis didn't go far enough or in detail enough to support the assumptions analysts made.

C8 Salmon FMP Amendment – Expanded Discussion Paper

The AP recommends the Council initiate an analysis to revise the Federal Fishery Management Plan for Salmon with the following:

- Modifications to Objectives 1 and 2 under Alternative 2 as presented in the discussion paper (i.e., suggested language on page 43);
- The management policy and objectives under Alternative 3 as outlined in the discussion paper (i.e., suggested language on page 44);
- The list of management measures to be delegated to the State of Alaska;
- The options for status determination criteria as presented for both Alternatives 2 and 3; and
- Other options as necessary to address MSA requirements.

The initial analysis should focus on the salmon fisheries in Cook Inlet but the AP recommends establishment of a Salmon Stakeholder Committee that includes, **but not limited to**, stakeholders from all three traditional west net areas. *[Motion to add bolded language passed 18-0.]*

Final motion as amended passed 18-1.

Rationale in Support:

- The AP thanks the authors and contributors on the extensive and thorough discussion paper that provides a solid foundation for initiating an analytical package.
- The bulleted list of items to include in the initial analysis are in direct response to suggestions outlined in the discussion paper, while recognizing that other analytical options are likely to be developed throughout the process.
- While the analysis should initially focus on the salmon fisheries in Cook Inlet, it is premature to remove the Prince William Sound and the Alaska Peninsula net areas from the analytical package at this time. When Amendment 12 was adopted, the three traditional net areas were excluded from the FMP for the same reasons. When revising the FMP, there is nothing precluding the selection of a different Alternative for each of the net areas, including status quo (Alternative 1), but an analytical package is necessary to determine the best alternative for each area to meet the requirements of the MSA.

- The complexities of the salmon fisheries necessitate a Stakeholder Committee with broad stakeholder interest, but there is nothing compelling participation. While the initial analysis will focus on Cook Inlet, including the option for representation from Prince William Sound and the Alaska Peninsula is important as those areas remain part of the analytical package.

Rationale Against:

- An option for analysis should be included to specifically leave the Prince William Sound and South Alaska Peninsula traditional net fishing areas status quo, as was requested in public comment by stakeholders; the Ninth Circuit Court decision states only that Amendment 12 is "contrary to law to the extent it removes Cook Inlet from the FMP".

C9 Halibut ABM

The AP recommends that the Council instruct the ABM workgroup to bring back a focused discussion paper.

In the discussion paper, the AP recommends that the workgroup consider the EBS shelf trawl survey and the IPHC Area 4ABCDE setline survey as indices for abundance based management of Pacific halibut PSC, and continue to refine options for their inclusion separately and/or in combination with control rules.

The AP further recommends the Council identify a more realistic range of ABM starting points.

- ~~Establish separate PSC limits for fixed and trawl gear. Maintain fixed gear PSC limit at status quo, unless a threshold is met to lower the limit.~~
 - ~~Fixed gear threshold: Fixed gear PSC would be adjusted downward if a conservation threshold such as the IPHC coastwide stock status reaches B_{30} or below.~~
 - ~~Examine control rule(s) to be applied to fixed gear fishery if B_{30} or other conservation threshold is met.~~

[Motion to add above stricken language failed 4-14.]

~~The AP recommends the Council consider a range of starting points for trawl sector be narrowed to 10% above the 2016 PSC cap to 10% below 2016 PSC use.~~

[Motion to add above stricken language failed 4-14.]

In developing control rules, the AP recommends the workgroup focus on which control rules, when combined with the two indices recommended by the workgroup, are most consistent with the Council's identified objectives for this action.

The AP also recommends that the workgroup include the following elements in a strawman ABM alternative. Workgroup consideration of this ABM strawman does not preclude consideration of other strawman alternatives.

- Use the EBS shelf trawl survey and IPHC setline survey for Area 4ABCDE, and the two-dimensional decision table approach identified in Table 20, p. 85, with control rules such as: (1) the number of stair-steps, (2) stair-steps with transitions and ramps, ~~and~~ (3) a continuous control rule **and (4) varying slopes at different levels of abundance (e.g., steeper slope at higher levels of abundance).** *[Motion to add item (4) passed 18-0.]*

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- Present options for defining low, medium, and high thresholds corresponding to each index, and provide examples of how these thresholds affect control rules that are based on strawman options and are consistent with the Council's objectives.
- Add a specific option that would allow different control rule and index combinations to be developed for BSAI longline and trawl PSC caps.
- Develop as a separate element, options for a control rule for use to reduce PSC caps when coast wide stock is below the B30 threshold. *[Motion to strike this bullet failed 6-12.]*
- To achieve the Council objective of providing the opportunity for a directed fishery, develop options for additional rules that specifically control O26 mortality such as: (1) an O26 cap in addition to the overall cap, and (2) an O26/U26 ratio; (3) an O26 Guideline harvest limit. These options would use the Area 4 ABCDE setline survey to set O26 PSC mortality limits. Relative to the guideline harvest limits, bycatch performance relative to the O26 control rule could trigger a response in a subsequent year.
- **Look at the difference between O30 and U30 of spawning biomass.** *[Motion to add bullet passed 11-7.]*
- **Include a discussion of the potential data limitations affecting the efficacy of a sub cap for O26.** *[Motion to add bullet passed 18-0.]*

Final motion as amended passed 15-3.

The following substitute motion failed 6-12:

The AP recommends the Council adopt the recommendations outlined by the SSC for the next iteration of the discussion paper.

Rationale for Amended Main Motion:

- The AP motion is largely consistent with SSC recommendations; the intent of the motion is to provide more direction on various components of control rules that industry would like to see further evaluated. Staff reaffirmed in their presentation that such direction would be helpful.
- Each index tracks a different size component of the stock and reflects the abundance components encountered by two sectors: trawl and the directed fishery. The combination of the two responds to the range of halibut sizes, with the trawl survey encountering the U26 component and the setline survey encountering the O26 component.
- The decision table approach provides a simple, comprehensible way to assess how each index may affect a control rule. This is consistent with the SSC recommendation that indices should be placed directly into a control rule, rather than combining them first.
- The motion provides some guidance on various control rule shapes to evaluate against Council objectives.
- The options provided in the motion are not prescriptive, but intended to provide focused guidance, scale and context for next steps.
- Defining **low, medium and high thresholds** is important to understand how potential changes in indices will affect PSC levels. These options could include numerous thresholds, a range of years in defining low/med/high or equal weighting of low/med/high.
- Allowing **different control rule and index combinations to be developed for BSAI longline and trawl** PSC caps is consistent with SSC recommendations. There are separate caps for each gear type and each gear type affects a different component of the stock;

developing different control rules with separate indices or combinations may prove responsive to these distinctions.

- Developing a **separate control rule for B30** is consistent with SSC recommendations and consistent with the Council objective to preserve the spawning biomass at low levels of abundance. When stocks are above B30, using an abundance index for just the BSAI may be appropriate, however if a coastwide conservation concern occurs that triggers a restriction on the directed harvest, a response mechanism for all halibut users should be evaluated. B30 has not been triggered in the last 100 years and would put the fishery in a crisis situation, maintaining a static bycatch cap in such case would not be acceptable.
- Developing an element of a control rule **that applies to 026 mortality** is consistent with SSC recommendations. Evaluating whether caps could be developed to reflect the 026/U26 composition of PSC may help balance some of the potentially conflicting objectives of the Council. The directed fishery depends on 026 abundance and availability; to provide an opportunity for a directed fishery, there is a tradeoff between how well the 026 component is controlled and how constraining the overall cap needs to be. The 026 portion could be further incorporated into a control rule using models such as a catch share plan between directed and bycatch users or by identifying a specific ratio of target 026/U26. The AP also recognized the current discrepancies between observer and fishery data regarding 026/U26 size composition at the vessel level and believes these limitations need to be better understood to determine whether such an approach could be effectively implemented.
- A wider evaluation of size composition that looks at a 030/U30 ratio would expand options in determining how separate PSC limits could be established using different components of the halibut stock

Rationale Against Main Motion:

- The Council would benefit from an expanded discussion paper on the relationship between the EBS shelf trawl survey and the IPHC setline survey for Area 4ABCDE and control rules.
- Attempting to develop a control rule within ABM focused on the 026 portion of halibut PSC is not realistic given data limitations, and would create an additionally constraining cap for 026 that would make ABM even more complicated.
- Existing cooperative incentive programs have proven to be effective at reducing bycatch, and an additional focus on 026 halibut within ABM is not necessary.
- A B30 coast wide reference point is not a useful tool in a BSAI ABM program that should be focused on the BSAI. There is not a correlation between BSAI halibut PSC and coastwide halibut stocks, for example the BSAI abundance of halibut could be increasing while the coastwide stock is on a downward trend. ABM will not be able to address the systemic problems that would cause the halibut stock to approach or dip below B30. Stakeholders need to be realistic about ABM and have manageable expectations.
- Developing an additional control that applies to 026 halibut will unnecessarily complicate the action, instead it is more appropriate to see how the ABM control rules could function before layering another cap that prioritizes only the IPHC setline survey.

Rationale in Support of Failed Motions:

- Given the extreme rarity of the situation, including options specific to a B30 threshold are not necessary at this time. It is more important to focus on developing a robust ABM program to address the current management situation within more typical ranges.
- Since 2015, the halibut PSC users have taken strides in reducing their PSC usage through the development of incentive programs, gear modification, and deck sorting EFPs. An 026 limit in addition to ABM would impact the fleets flexibility at avoiding halibut.
- Fixed gear should be treated separately under an ABM program, evaluated as a trigger approach based on a conservation threshold since the sector comprises of a relatively small portion of total PSC in the BSAI and its actual usage is significantly lower than the sector's PSC limit.
- The fixed gear sector proposal to only have reductions in their halibut PSC if the coastwise halibut stocks are below B30, an event that has happened once in 100 years, is tantamount to being functionally exempt from ABM and getting the status quo. Each sector needs to share in conservation of the halibut resource through ABM.
- Starting points should be narrowed down to a more realistic number so that stakeholders are able to better understand how the control rules may impact PSC levels. The current range of starting points is too broad and does not provide a useful reference.

D1 Halibut Deck Sorting EFP and Halibut Genetics Sampling EFP

The AP recommends the Council support the 2018/2019 deck sorting EFP. *Motion passed 16-0.*

The AP recommends the Council support the halibut genetics EFP. *Motion passed 16-0.*

Rationale:

- The latest deck sorting EFP builds upon previous work from the ground-fish sector which has resulted in significant halibut bycatch reductions. The AP fully endorses continued efforts to increase efficiencies and safety protocols and to verify genetic stock structure studies of the halibut population.

D2 IFQ Committee Report including data review

The AP recommends that the Council request that NMFS OLE provide a written report that describes how costs have been charged to the IFQ cost recovery program in recent years and what changes are planned.

The AP further recommends that the Council direct OLE to establish a policy of billing to the IFQ cost recovery program only those costs that are incurred as "incremental costs" of the IFQ program, as defined in NOAA's Catch Share Policy.

Motion passed 15-0.

Rationale:

- While the role OLE plays in managing fisheries is appreciated, detail and clarity on costs would be helpful
- It is unclear if OLE and the management side of the cost recovery are following the same policies in how they bill the fleet. We need to understand if the fees collected are consistent with NOAA's Catch Share Policy, which allows fees only for incremental costs; those costs which would not have occurred but for the management of the specific LAP program.
- OLE related charges to the IFQ cost recovery program continue to increase while the halibut/sablefish fleet and transfers and deliveries have all significantly decreased. The IFQ review highlighted that the number of boats fishing under the IFQ program has decreased by 51% and number of offloads has decreased by 42%, while the OLE charge to the IFQ program is up 20%.
- Officers assigned to communities to monitor IFQ activities are doing more than just IFQ enforcement, but the totality of what they do is being charged to IFQ QS holders, significantly driving up cost recovery fees.
- A billing policy would provide direction and consistency with authorizing and identifying cost recovery fees, per the catch share policy.

D3 Halibut Retention in Sablefish Pots

Discussion Paper

The AP recommends that Council task staff with analyzing the following Alternatives, Elements and Options:

Alternative 1. No action.

Alternative 2. Allow the retention of halibut caught incidentally in longline or single pots used in the BSAI-Sablefish IFQ fishery, provided the IFQ holder also holds sufficient halibut IFQ for that IPHC regulatory area.

Element 1. Gear retrieval.

Option 1. Gear cannot be left for more than **a range of 5-10 days** without being moved. All gear must be removed from the grounds once an IFQ holder no longer has **sablefish** IFQ to harvest in a specific area. [*Motions in bold passed 15-0.*]

Additionally, all vessels using longline pot gear are required to use logbooks and VMS.

A review of the effects of allowing retention of halibut caught incidentally in longline or single pots used in the BSAI Sablefish fishery will be conducted 3 years after implementation and that NMFS include pot gear in their management report to the Council.

Motion as amended passed 15-0.

Rationale:

- Depredation by killer whales on longline gear is a growing challenge in the BSAI sablefish and halibut IFQ fisheries. The Council has received significant public testimony as to the dimensions of this problem including, impacts on the halibut and sablefish resources; harvesting operations and trips; and underreported harvests. The use of longline or single pots has been effective in curtailing killer whale depredation.

- Under current federal regulations, halibut taken with pot gear in the BSAI must currently be discarded, although discard is not allowed in the Gulf of Alaska. Discarding halibut taken with pots used in the sablefish fishery encourages killer whale predation, and contributes to halibut wastage. Allowing retention of halibut caught incidentally in longline or single pots used BSAI-Sablefish IFQ fishery, would address concerns with killer whale depredation, make the fishery more efficient for fishermen with halibut IFQ, and reduce regulatory discards and associated mortality.
- This action would address the above concerns and is responsive to the Council's objectives of conserving the halibut resource and reducing halibut mortality.
- Limitations should be placed on the length of time gear can soak before being turned over or moved to other grounds. In evaluating an appropriate duration, issues such as fish quality, gear conflicts and logistical challenges of the fleet should be considered.

Targeted Fishing for Halibut with Pot Gear

The AP recommends that the Council request an expanded discussion paper on the targeted fishing for halibut with longline and single pot gear in the BSAI, including the Gulf side of IPHC Area 4A.

The discussion paper should include further development of the following elements that pertain to this action, taken from the discussion paper "Halibut Retention in Sablefish Pots."

1. Legal Gear

Federal regulations define authorized fishing gear (Section 679.2). Within that definition, legal fixed gear includes, in (4)(iii), hook-and-line gear **only** for halibut harvested from any IFQ regulatory area. Subpart (4)(iii) would need to be revised to include "all pot gear" if the Council wants to allow vessels to target halibut with pots.

2. Tunnel Openings

Federal regulations (Subpart (15)(ii)) defines Tunnel openings: "Each pot used to fish for groundfish must be equipped with rigid tunnel openings that are no wider than 9 inches (22.86 cm) and no higher than 9 inches (22.86 cm), or soft tunnel openings with dimensions that are no wider than 9 inches (22.86 cm)."

An action that allows vessels to target halibut with pot gear should consider whether these maximum opening limits should be revised.

3. Gear and gear deployment regulations

Section 679.42(l) establishes GOA sablefish longline pot gear requirements and restrictions on longline pot gear deployment and retrieval. This includes rules for pot tags, vessel pot limits, restrictions on leaving pots unattended on fishing grounds, and logbook use.

An action to allow vessels to target halibut with pot gear would need to include such consideration of such regulations.

4. Pribilof Island Habitat Conservation Zone

An action that allows vessels to target halibut with pot gear should consider whether those pots should be allowed in the PIHCZ.

5. Bycatch considerations

6. Marine mammal interactions

Motion passed 15-0.

Rationale:

- Under current federal regulations, pot gear is not legal gear for harvest of halibut in the BSAI. Allowing pot gear for harvesting halibut would address concerns with killer whale depredation by preventing loss of halibut from hooks, and make the fishery more efficient for fishermen with halibut IFQ. The unreported halibut mortality from killer whale depredation would also be curtailed.
- This action is responsive to the Council's objective of conserving the halibut resource

E. Staff Tasking

The AP took no action on this agenda item.

Species	Area	OFL	2016 ABC	TAC	Catch	OFL	2017 ABC	TAC	Catch as of 9/2/17	2018 & 2019		
										OFL	ABC	TAC
Pollock	State GHL	n/a	6,358	-	n/a	n/a	5,094	-	-	n/a	3,937	-
	W (610)	n/a	56,494	56,494	61,252	n/a	43,602	43,602	9,198	n/a	33,701	33,701
	C (620)	n/a	124,927	124,927	47,025	n/a	98,652	98,652	61,132	n/a	76,249	76,249
	C (630)	n/a	57,183	57,183	64,816	n/a	48,929	48,929	16,062	n/a	37,818	37,818
	WYAK	n/a	9,348	9,348	133	n/a	7,492	7,492	40	n/a	5,791	5,791
	Total	Subtotal	322,858	254,310	247,952	173,226	235,807	203,769	198,675	86,432	182,204	157,496
	EYAK/SEO	13,226	9,920	9,920	-	13,226	9,920	9,920	-	13,226	9,920	9,920
	Total	336,084	264,230	257,872	173,226	249,033	213,689	208,595	86,432	195,430	167,416	163,479
Pacific Cod	W	n/a	40,503	28,352	18,475	n/a	36,291	25,404	15,505	n/a	22,565	15,796
	C	n/a	49,312	36,984	23,973	n/a	44,180	33,135	14,646	n/a	27,471	20,603
	E	n/a	8,785	6,589	69	n/a	7,871	5,903	45	n/a	4,894	3,671
	Total	116,700	98,600	71,925	42,517	105,378	88,342	64,442	30,196	67,486	54,930	40,069
Sablefish	W	n/a	1,272	1,272	1,059	n/a	1,349	1,349	698	n/a	1,367	1,367
	C	n/a	4,023	4,023	4,175	n/a	4,514	4,514	3,412	n/a	4,574	4,574
	WYAK	n/a	1,475	1,475	1,656	n/a	1,605	1,605	1,498	n/a	1,626	1,626
	SEO	n/a	2,317	2,317	2,464	n/a	2,606	2,606	2,070	n/a	2,640	2,640
	Total	10,326	9,087	9,087	9,354	11,885	10,074	10,074	7,678	12,045	10,207	10,207
Shallow-Water Flatfish	W	n/a	20,851	13,250	148	n/a	20,921	13,250	248	n/a	21,042	13,250
	C	n/a	19,242	19,242	3,658	n/a	19,306	19,306	1,830	n/a	19,418	19,418
	WYAK	n/a	3,177	3,177	1	n/a	3,188	3,188	-	n/a	3,206	3,206
	EYAK/SEO	n/a	1,094	1,094	1	n/a	1,099	1,099	-	n/a	1,105	1,105
	Total	54,520	44,364	36,763	3,808	54,583	44,514	36,843	2,078	54,893	44,771	36,979
Deep-Water Flatfish	W	n/a	186	186	4	n/a	256	256	20	n/a	257	257
	C	n/a	3,495	3,495	220	n/a	3,454	3,454	121	n/a	3,488	3,488
	WYAK	n/a	2,997	2,997	9	n/a	3,017	3,017	7	n/a	3,047	3,047
	EYAK/SEO	n/a	2,548	2,548	5	n/a	2,565	2,565	2	n/a	2,590	2,590
	Total	11,102	9,226	9,226	238	11,182	9,292	9,292	150	11,290	9,382	9,382
Rex Sole	W	n/a	1,315	1,315	172	n/a	1,459	1,459	44	n/a	1,478	1,478
	C	n/a	4,445	4,445	1,573	n/a	4,930	4,930	1,120	n/a	4,995	4,995
	WYAK	n/a	766	766	3	n/a	850	850	2	n/a	861	861
	EYAK/SEO	n/a	967	967	-	n/a	1,072	1,072	-	n/a	1,087	1,087
	Total	9,791	7,493	7,493	1,748	10,860	8,311	8,311	1,166	11,004	8,421	8,421
Arrowtooth Flounder	W	n/a	28,183	14,500	1,007	n/a	28,100	14,500	176	n/a	25,747	14,500
	C	n/a	107,981	75,000	18,784	n/a	107,934	75,000	19,161	n/a	98,895	75,000
	WYAK	n/a	37,368	6,900	26	n/a	37,405	6,900	30	n/a	34,273	6,900
	EYAK/SEO	n/a	12,656	6,900	13	n/a	12,654	6,900	11	n/a	11,595	6,900
	Total	219,430	186,188	103,300	19,830	219,327	186,093	103,300	19,378	196,635	170,510	103,300
Flathead Sole	W	n/a	11,027	8,650	228	n/a	11,098	8,650	65	n/a	11,282	8,650
	C	n/a	20,211	15,400	2,190	n/a	20,339	15,400	1,357	n/a	20,677	15,400
	WYAK	n/a	2,930	2,930	2	n/a	2,949	2,949	-	n/a	2,998	2,998
	EYAK/SEO	n/a	852	852	-	n/a	857	857	-	n/a	872	872
	Total	42,840	35,020	27,832	2,420	43,128	35,243	27,856	1,422	43,872	35,829	27,920

Sources: 2016 OFLs, ABCs, and TACs are from harvest specifications adopted by the Council in December 2015; 2017 OFLs, ABCs, and TACs are from the harvest specifications adopted by the Council in December 2016, 2016 catches through December 31, 2016 and 2017 catches through September 2, 2017 from AKR Catch Accounting.

Species	Area	2016				2017			Catch as of 9/2/17	2018 & 2019		
		OFL	ABC	TAC	Catch	OFL	ABC	TAC		OFL	ABC	TAC
Pacific Ocean Perch	W	n/a	2,737	2,737	2,654	n/a	2,679	2,679	2,530	n/a	2,627	2,627
	C	n/a	17,033	17,033	17,646	n/a	16,671	16,671	13,025	n/a	16,347	16,347
	WYAK	n/a	2,847	2,847	2,827	n/a	2,786	2,786	2,757	n/a	2,733	2,733
	W/C/WYAK	26,313	22,617	22,617	23,127	25,753	22,136	22,136	18,312	25,252	21,707	21,707
	SEO	2,118	1,820	1,820	-	2,073	1,782	1,782	-	2,032	1,747	1,747
	Total	28,431	24,437	24,437	23,127	27,826	23,918	23,918	18,312	27,284	23,454	23,454
Northern Rockfish	W	n/a	457	457	121	n/a	432	432	211	n/a	400	400
	C	n/a	3,547	3,547	3,316	n/a	3,354	3,354	1,311	n/a	3,108	3,108
	E	n/a	4	-	-	n/a	4	-	-	n/a	4	-
	Total	4,783	4,004	4,004	3,437	4,522	3,790	3,786	1,522	4,175	3,512	3,508
Shortraker Rockfish	W	n/a	38	38	53	n/a	38	38	22	n/a	38	38
	C	n/a	301	301	419	n/a	301	301	153	n/a	301	301
	E	n/a	947	947	305	n/a	947	947	246	n/a	947	947
	Total	1,715	1,286	1,286	777	1,715	1,286	1,286	421	1,715	1,286	1,286
Dusky Rockfish	W	n/a	173	173	95	n/a	158	158	81	n/a	146	146
	C	n/a	4,147	4,147	3,217	n/a	3,786	3,786	2,249	n/a	3,499	3,499
	WYAK	n/a	275	275	7	n/a	251	251	22	n/a	232	232
	EYAK/SEO	n/a	91	91	8	n/a	83	83	5	n/a	77	77
	Total	5,733	4,686	4,686	3,327	5,233	4,278	4,278	2,357	4,837	3,954	3,954
Rougheye and Blackspotted Rockfish	W	n/a	105	105	42	n/a	105	105	20	n/a	104	104
	C	n/a	707	707	484	n/a	706	706	244	n/a	702	702
	E	n/a	516	516	115	n/a	516	516	158	n/a	512	512
	Total	1,596	1,328	1,328	641	1,594	1,327	1,327	422	1,583	1,318	1,318
Demersal shelf rockfish	Total	364	231	231	117	357	227	227	111	357	227	227
Thornyhead Rockfish	W	n/a	291	291	207	n/a	291	291	79	n/a	291	291
	C	n/a	988	988	689	n/a	988	988	472	n/a	988	988
	E	n/a	682	682	222	n/a	682	682	218	n/a	682	682
	Total	2,615	1,961	1,961	1,118	2,615	1,961	1,961	769	2,615	1,961	1,961
Other Rockfish	W/C	n/a	1,534	1,534	1,190	n/a	1,534	1,534	850	n/a	1,534	1,534
	WYAK	n/a	574	574	53	n/a	574	574	41	n/a	574	574
	EYAK/SEO	n/a	3,665	200	40	n/a	3,665	200	25	n/a	3,665	200
	Total	7,424	5,773	2,308	1,283	7,424	5,773	2,308	916	7,424	5,773	2,308
Atka mackerel	Total	6,200	4,700	2,000	1,092	6,200	4,700	3,000	987	6,200	4,700	3,000
Big Skate	W	n/a	908	908	166	n/a	908	908	112	n/a	908	908
	C	n/a	1,850	1,850	1,884	n/a	1,850	1,850	1,050	n/a	1,850	1,850
	E	n/a	1,056	1,056	51	n/a	1,056	1,056	100	n/a	1,056	1,056
	Total	5,086	3,814	3,814	2,101	5,086	3,814	3,814	1,262	5,086	3,814	3,814
Longnose Skate	W	n/a	61	61	154	n/a	61	61	21	n/a	61	61
	C	n/a	2,513	2,513	887	n/a	2,513	2,513	545	n/a	2,513	2,513
	E	n/a	632	632	355	n/a	632	632	220	n/a	632	632
	Total	4,274	3,206	3,206	1,396	4,274	3,206	3,206	786	4,274	3,206	3,206
Other Skates	GOA-wide	2,558	1,919	1,919	1,666	2,558	1,919	1,919	910	2,558	1,919	1,919
Sculpins	GOA-wide	7,338	5,591	5,591	1,332	7,338	5,591	5,591	1,168	7,338	5,591	5,591
Sharks	GOA-wide	6,020	4,514	4,514	2,016	6,020	4,514	4,514	841	6,020	4,514	4,514
Squids	GOA-wide	1,530	1,148	1,148	239	1,516	1,137	1,137	18	1,516	1,137	1,137
Octopuses	GOA-wide	6,504	4,878	4,878	383	6,504	4,878	4,878	162	6,504	4,878	4,878
Total		727,684	590,809	293,617	297,193	796,158	667,877	535,863	179,460	682,141	572,710	465,832

Sources: 2016 OFLs, ABCs, and TACs are from harvest specifications adopted by the Council in December 2015; 2017 OFLs, ABCs, and TACs are from the harvest specifications adopted by the Council in December 2016, 2016 catches through December 31, 2016 and 2017 catches through September 2, 2017 from AKR Catch Accounting.

**C4-Addendum-GOA Pcod Adjustments
OCTOBER 2017**

Proposed 2018/2019 Gulf of Alaska Pacific cod ABCs, TACs and State Guideline Harvest Levels (GHLs) in metric tons.

Specifications	Western	Central	Eastern	Total
ABC	22,565	27,471	4,894	54,930
State GHL	6,770	6,868	1,224	14,861
(%)	30%	25%	25%	25-30
Federal TAC	15,796	20,603	3,671	40,069

October SSC proposed BSAI Groundfish OFL and ABC and AP proposed TAC recommendations for 2018-2019 (in metric tons)

Species	Area	2016			Catch	2017			Catch as of 9/2/17	2018 and 2019		
		OFL	ABC	TAC		OFL	ABC	TAC		OFL	ABC	TAC
Pollock	EBS	3,910,000	2,090,000	1,340,000	1,352,707	3,640,000	2,800,000	1,345,000	1,287,862	4,360,000	2,979,000	1,359,358
	AI	39,075	32,227	19,000	1,257	43,650	36,061	19,000	1,095	49,291	40,788	19,000
	Bogoslof	31,906	23,850	500	1,005	130,428	60,800	500	186	130,428	97,428	500
Pacific cod	BS	390,000	255,000	238,680	231,514	284,000	239,000	223,704	171,442	258,687	208,265	194,936
	AI	23,400	17,600	12,839	12,593	28,700	21,500	15,695	10,675	28,700	21,500	15,695
Sablefish	BS	1,304	1,151	1,151	532	1,499	1,274	1,274	984	1,519	1,291	1,274
	AI	1,766	1,557	1,557	349	2,044	1,735	1,735	405	2,072	1,758	1,735
Yellowfin sole	BSAI	228,100	211,700	144,000	135,350	287,000	260,800	154,000	92,798	276,000	250,800	154,000
Greenland turbot	BSAI	4,194	3,462	2,873	2,238	11,615	6,644	4,500	2,623	12,831	10,864	4,500
	BS	n/a	2,673	2,673	2,117	n/a	5,800	4,375	2,528	n/a	9,484	4,375
	AI	n/a	789	200	121	n/a	844	125	95	n/a	1,380	125
Arrowtooth flounder	BSAI	94,035	80,701	14,000	11,110	76,100	65,371	14,000	5,051	67,023	58,633	14,000
Kamchatka flounder	BSAI	11,100	9,500	5,000	4,851	10,360	8,880	5,000	4,091	10,700	9,200	5,000
Northern rock sole	BSAI	165,900	161,000	57,100	45,101	159,700	155,100	47,100	33,341	147,300	143,100	50,100
Flathead sole	BSAI	79,562	66,250	21,000	10,384	81,654	68,278	14,500	7,949	79,136	66,164	15,500
Alaska plaice	BSAI	49,000	41,000	14,500	13,385	42,800	36,000	13,000	13,326	36,900	32,100	13,000
Other flatfish	BSAI	17,414	13,061	2,500	2,847	17,591	13,193	2,500	4,028	17,591	13,193	2,500
Pacific ocean perch	BSAI	40,529	33,320	31,900	31,319	53,152	43,723	34,900	24,057	51,950	42,735	34,900
	BS	n/a	8,353	8,000	8,221	n/a	12,199	11,000	5,444	n/a	11,924	11,000
	EAI	n/a	7,916	7,900	7,444	n/a	10,307	7,900	4,208	n/a	10,074	9,900
	CAI	n/a	7,355	7,000	6,765	n/a	8,009	7,000	5,890	n/a	7,828	7,500
	WAI	n/a	9,696	9,000	8,888	n/a	13,208	9,000	8,515	n/a	12,909	12,000
Northern rockfish	BSAI	14,689	11,960	4,500	4,541	16,242	13,264	5,000	4,125	15,854	12,947	5,000
Blackspotted/Rougheye rockfish	BSAI	693	561	300	159	612	501	225	163	750	614	225
	EBS/EAI	n/a	179	100	72	n/a	306	100	49	n/a	374	100
	CAI/WAI	n/a	382	200	87	n/a	195	125	114	n/a	240	125
Shortraker rockfish	BSAI	690	518	200	112	666	499	125	133	666	499	125
Other rockfish	BSAI	1,667	1,250	875	789	1,816	1,362	875	593	1,816	1,362	875
	BS	n/a	695	325	282	n/a	791	325	216	n/a	791	325
	AI	n/a	555	550	507	n/a	571	550	377	n/a	571	550
Atka mackerel	BSAI	104,749	90,340	55,000	54,485	102,700	87,200	65,000	45,766	99,900	85,000	65,000
	EAI/BS	n/a	30,832	28,500	28,360	n/a	34,890	34,500	16,236	n/a	34,000	34,500
	CAI	n/a	27,216	16,000	15,795	n/a	30,330	18,000	17,304	n/a	29,600	21,500
	WAI	n/a	32,292	10,500	10,330	n/a	21,980	12,500	12,226	n/a	21,400	13,910
Skates	BSAI	50,215	42,134	26,000	29,687	49,063	41,144	26,000	22,623	46,583	39,008	26,000
Sculpins	BSAI	52,365	39,725	4,500	4,947	56,582	42,387	4,500	4,058	56,582	42,387	4,500
Sharks	BSAI	1,363	1,022	125	126	689	517	125	82	689	517	125
Squids	BSAI	6,912	5,184	1,500	1,378	6,912	5,184	1,342	2,006	6,912	5,184	1,342
Octopuses	BSAI	3,452	2,589	400	627	4,769	3,576	400	152	4,769	3,576	400
Total	BSAI	5,324,080	3,236,662	2,000,000	1,953,391	5,110,344	4,013,993	2,000,000	1,739,614	5,764,649	4,167,913	2,000,000

Sources: 2016 OFLs, ABCs, and TACs and 2017 OFLs and ABCs are from harvest specifications adopted by the Council in December 2015 and December 2016, respectively; 2016 catches through December 31, 2016 and 2017 catches through September 2, 2017 from AKR Catch Accounting.