

**Errata Sheet
for
Gulf of Alaska Trawl Bycatch Management
Discussion Paper
February 2016¹**

This errata sheet is provided as a replacement for Section 1 of the originally published discussion paper. The sole purpose of this change is to provide readers with a better explanation of how to interpret the tables. The analysts received early feedback that some readers did not clearly understand how to interpret the number of licenses that had a particular endorsement for each GOA area.

1 GOA Groundfish Trawl LLP Licenses

At its October 2015 meeting the Council directed staff to provide additional information on the active and inactive GOA trawl groundfish LLP licenses. This information was requested in part because of the options being considered to allocate PSC limits under Alternative 3. Alternative 2 would only allocate quota and PSC to licenses based on catch history. Alternative 3 considers allocating PSC equally among vessels that have a valid GOA trawl LLP license, the representative applies for an annual allocation, and they agree to meet the active participation requirements. A goal of Alternative 3 is to allow all LLP license holders and their associated vessels to qualify for an allocation and potentially create a lower cost for new entrants to access the fishery relative to Alternative 2. The degree that it will cost less to enter the fishery depends on a variety of factors that will be considered in the EIS. To the extent the licenses create access to PSC and a resulting increased net revenue stream, they could command a higher market price than the status quo. However, the cost may be less than buying a license with target and secondary history attached, because of the unknown level of future net revenue that could be generated by that license. For persons active in the fishery, that have had above average historic levels of catch, dividing the PSC among more vessels would dilute the amount of PSC those persons would bring into a cooperative (or to the Limited Access sector).

Groundfish licenses that have been inactive in the non-Rockfish Program GOA trawl fishery would not be eliminated by the proposed action. Depending on the option selected, no existing license that is associated with a vessel would be prohibited from participating in a trawl cooperative or the GOA limited access trawl fishery. Vessels in the limited access fishery would be allowed to compete for any target species available, but under the constraint of reduced PSC limits.

Under Alternative 3, vessels assigned a latent or active LLP license would be allowed to join a trawl cooperative, and would be granted an equal portion of the PSC limit; under Alternative 2 inactive license holders could join a cooperative, but could only access target species and/or PSC quotas brought into the cooperative by license holders with qualifying catch history. Access to individual PSC limits or target (and secondary) species would be granted under the terms of the cooperatives' privately negotiated contracts.

The Council requested the following information so that it could begin considering the impacts of the proposed allocation methods on both "active" participants and holders of "latent" licenses (those that have not been active in the non-Rockfish program GOA trawl fisheries in recent years). Three different time periods are considered, based on the year combinations proposed in Alternative 2. These periods were selected because they provide a more direct comparison of the latent licenses assigned to vessels that

¹ Prepared by Darrell Brannan (NPFMC contractor) and Sam Cunningham (NPFMC staff).

could be granted a PSC limit allocation under structures based on catch history (Alternative 2) and those based on capacity or equal shares (Alternative 3).

1.1 2008 through 2012

Restricted Access Management (RAM) license data published in 2015 indicates there are a total of 152 Groundfish LLP licenses with a trawl endorsement for at least one GOA management area (Table 1). The matrix of licenses by endorsement type indicates that 28 of the licenses have a C/P endorsement. The remaining 124 licenses may only be used when the vessel named on the license is operating as a CV.

The number of licenses by type of Western GOA gear endorsement and associated Central GOA gear endorsements are shown in the columns. For example, reading the columns at the CV total row indicates that of the 124 CV licenses issued there are 42 licenses with no Western GOA trawl endorsement, 4 with only a non-trawl endorsement, 54 with a trawl and non-trawl endorsement, and 24 with only a trawl endorsement.

The breakout of Central GOA endorsements on those licenses are provided under the CV total row. For example, 28 of the 42 licenses that do not have a Western GOA trawl endorsement have both a trawl and non-trawl endorsement in the Central GOA, and the other 14 licenses only have a Central GOA trawl endorsement. The four licenses that only have a non-trawl endorsement in the Western GOA all have both a non-trawl and trawl endorsement for the Central GOA. Of the 54 licenses that have a non-trawl and trawl endorsement for the Western GOA, four have no endorsements for the Central GOA, 16 only have a non-trawl endorsement for the Central GOA, and 34 have a non-trawl and trawl endorsement for both areas. Licenses (24) with only a trawl endorsement for the Western GOA fall into two categories when also considering their Central GOA endorsements. Seven of the licenses have no Central GOA endorsements and 17 only have trawl endorsements in both areas.

Based on the information in Table 1 there are a total of 78 licenses with a trawl endorsement for the Western GOA. Recall that 54 have both a non-trawl and trawl endorsement and 24 only have a trawl endorsement). Of those 78 licenses, 11 cannot be used to fish in the Central GOA and 16 can only be used to fish the Central GOA with non-trawl gear.

When focusing on the Central GOA CV licenses, the summary is provided in the total column for each row. In that column it shows that of the 124 CV licenses, 11 have no Central GOA endorsement, 16 only have a non-trawl endorsement, 66 have both a non-trawl and trawl endorsement, and the remaining 31 licenses only have a Central GOA trawl endorsement. The 66 licenses with a Central GOA non-trawl and trawl endorsement have the following Western GOA endorsements: 28 have no Western GOA gear endorsement, 4 only have a non-trawl endorsement for the Western GOA, and 34 have a non-trawl and trawl endorsement in both areas. Of the 31 licenses that only have a trawl endorsement in the Central GOA, 14 have no Western GOA endorsement and 17 only have a Western GOA trawl endorsement.

Table 1 GOA groundfish LLP licenses with a trawl endorsement

		Western Gulf Gear Endorsements				Total
		None	Non-trawl	Non-trawl & Trawl	Trawl	
Central Gulf Gear Endorsements	C/P	7	1	2	18	28
	None				7	7
	Non-trawl & Trawl	1	1	2		4
	Trawl	6			11	17
	CV	42	4	54	24	124
	None			4	7	11
	Non-trawl			16		16
	Non-trawl & Trawl	28	4	34		66
	Trawl	14			17	31
	Grand Total	49	5	56	42	152

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.

Table 2 shows the subset of licenses reported in Table 1 that were inactive in the GOA non-Rockfish Program trawl fisheries from 2008 through 2012. In general, the table is presented in the same format as described for Table 1. However, some cells in the C/P section have two numbers, a number and a number in parentheses. The number by itself shows the total number of licenses that were not active as a C/P. The number in parentheses shows the number of C/P licenses that were not active as either a CV or a C/P. For example, in the C/P total row there were five C/P licenses that were not active in the GOA trawl fisheries from 2008 through 2012. The difference between the two numbers is the number of licenses that were not active as C/Ps but were active as a CV during the time period considered. Based on the Council’s motion, licenses that delivered to an inshore processor could be converted to inshore CV licenses and used to join an inshore cooperative. If the holder of those licenses converted them to inshore CV licenses, they could not be used to deliver to C/Ps or act as C/Ps in the future.

A total of 39 CV licenses were inactive. Seventeen of the licenses did not have a trawl endorsement for the Western GOA, and 16 did not have a trawl endorsement for the Central GOA. Six of the inactive licenses held a trawl endorsement for both areas. By area, 24 licenses had a Western GOA trawl endorsement and 23 held a Central GOA trawl endorsement. The reader should note that these totals double count the six licenses that were endorsed for both areas.

Under Alternative 3, the inactive licenses could be attached to a vessel and that vessel could be allocated an equal share of the PSC limit or an amount of PSC based on the vessel’s capacity. To receive the allocation the vessel would be required to be active during that fishing year, or active in specific fisheries depending on the alternative selected. Inactive licenses could also be used to fish under Alternative 2, but the license holder would be required to fish in the limited access fishery or obtain quota from a person/cooperative that holds quota.

Additional information on the completely inactive C/P licenses provides some explanation of why they were inactive. One of the five licenses was derived from an AFA C/P. The AFA prohibits these licenses and vessels from being active in the GOA. Three other licenses were derived from Amendment 80 vessels. These Amendment 80 licenses (vessels) are limited by inshore/offshore regulations in the GOA pollock and Pacific cod fisheries. They are also limited in the GOA flatfish fisheries by sideboards. The fifth license is eligible to be issued Rockfish Program quota on an annual basis.

Of the 39 CV licenses, 10 were derived from an AFA vessel, six other licenses held Rockfish Program quota, and one other license had crab sideboard limit restrictions. Fourteen of the remaining 22 licenses had a GOA pot cod endorsement and one had a HAL cod endorsement. Two of the remaining 7 licenses had a trawl endorsement for the BS or AI, and all of the five remaining licenses had a non-trawl endorsement for at least one area in the GOA or BSAI.

Table 2 Number of GOA groundfish trawl LLP licenses that were inactive in the GOA non-Rockfish Program trawl fisheries in the GOA from 2008 through 2012

		Western Gulf Gear Endorsements				Total
		None	Non-trawl	Non-trawl & Trawl	Trawl	
Central Gulf Gear Endorsements	C/P	4 (2)	1	1 (0)	3 (2)	9 (5)
	None				2	2
	Non-trawl & Trawl		1	1 (0)		2 (1)
	Trawl	4 (2)			1 (0)	5 (2)
	CV	13	4	16	6	39
	None				4	4
	Non-trawl			12		12
	Non-trawl & Trawl	10	4	4		18
	Trawl	3			2	5
	Grand Total	17	5	17	9	44

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.

Table 3 shows that 108 licenses number of licenses were active in the GOA non-Rockfish Program trawl fisheries from 2008 through 2012. Of those licenses, 19 C/P licenses were active as C/Ps. Four additional C/P licenses were active, but only on vessels that were operating as CVs. One of the C/P licenses that was only active as a catcher vessel delivered all its catch to a mothership (or C/P acting as a mothership). This is the only C/P license that would not be eligible to convert to an inshore CV licenses and fish off the inshore CV allocation. That license could potentially convert to a CV licenses under the terms of the LLP, but could only fish off PSC and target species allocated to the offshore sector. The three remaining C/P licenses could be converted to inshore CV licenses and deliver to the inshore processors.

A total of 85 CV licenses were active. In the Western GOA, 56 CV licenses with a trawl endorsement were active (58 including the C/P licenses acting only as CVs). In the Central GOA, 74 CV licenses were active (77 counting the C/P licenses acting only as CVs). Forty-five of the active licenses had endorsements for both areas.

Table 3 Number of GOA groundfish trawl LLP Licenses that were active in the GOA non-Rockfish Program trawl fisheries in the GOA from 2008 through 2012

	Western Gulf Gear Endorsements				Total
	None	Non-trawl	Non-trawl & Trawl	Trawl	
C/P	3	0	1	15	19
None				5	5
Non-trawl & Trawl	1		1		2
Trawl	2			10	12
CV	29 (31)	0	38 (39)	18 (19)	85 (89)
None			4	3	7
Non-trawl			4		4
Non-trawl & Trawl	18		30 (31)		48
Trawl	11 (13)		0	15 (16)	26 (29)
Grand Total	32 (34)	0	39 (40)	33	104 (108)

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.

1.2 2007 through 2012

Selecting a different time period for catch history does not change the total number of licenses issued in 2015. That information was already presented in Table 1, so it is not repeated again.

The total number of completely inactive licenses in the GOA non-Rockfish Program trawl fishery decreased from 44 to 41, as a result of adding 2007 as a qualifying year (Table 4). The three licenses that were active only in 2007 were all CV licenses. These three licenses would qualify for an allocation under Alternative 2. All of the CV licenses reported in Table 1 could apply for an allocation under Alternative 3. Therefore, the maximum difference in the number of CVs (licenses) receiving an allocation between Alternative 2 and Alternative 3 is 41 using the years 2007 through 2012 as the qualifying years.

One C/P license was active as a C/P in 2007, but in the 2008 through 2012 period was only active as a CV. That information is shown by the total number of inactive C/Ps decreasing from nine in Table 2 eight in Table 4. The owners of all three of the four of the C/P licenses that were active as a CV during the 2007 through 2012 period could elect to operate as a CV in the inshore sector of the program or remain in the offshore (C/P) sector, because they made deliveries to the inshore sector during the qualifying years.

Table 4 Number of GOA groundfish trawl LLP Licenses that were inactive in the GOA non-Rockfish Program trawl fisheries in the GOA from 2007 through 2012

		Western Gulf Gear Endorsements				Total
		None	Non-trawl	Non-trawl & Trawl	Trawl	
Central Gulf Gear Endorsements	C/P	4(2)	1	1(0)	2	8(5)
	None				2	2
	Non-trawl & Trawl		1	1(0)		2(1)
	Trawl	4(2)				4(2)
	CV	13	4	15	4	36
	None				3	3
	Non-trawl			12		12
	Non-trawl & Trawl	10	4	3		17
	Trawl	3			1	4
	Grand Total	15	5	15	6	41

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.

Table 5 shows the number of active licenses from 2007 through 2012. The licenses in this table represents the number of licenses that could qualify for an allocation under Alternative 2. It is not known how many of the 41 latent CV licenses could become active under Alternative 3 by being attached to a vessel that will fish in the future.

Table 5 Number of GOA groundfish trawl LLP Licenses that were active in the GOA non-Rockfish Program trawl fisheries in the GOA from 2007 through 2012

		Western Gulf Gear Endorsements				Total
		None	Non-trawl	Non-trawl & Trawl	Trawl	
Central Gulf Gear Endorsements	C/P	3		1	16	20
	None				5	5
	Non-trawl & Trawl	1		1		2
	Trawl	2			11	13
	CV	29(31)		39(40)	20	88(91)
	None			4	4	8
	Non-trawl			4		4
	Non-trawl & Trawl	18		31(32)		49(50)
	Trawl	11(13)			16	27(29)
	Grand Total	34		41	36	111

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.

1.3 2003 through 2012

The total number of inactive LLP licenses from 2003 through 2012 decreased to 20 under this broader set of qualifying years. Two C/P LLP licenses were completely inactive in the GOA non-Rockfish Program trawl fisheries, and 18 CV licenses were inactive. Three additional C/P licenses were used to harvest fish on vessels acting as CVs. All three of the inactive C/P licenses that made landings as a CV had both inshore deliveries and deliveries to a mothership during the 2003 through 2012 period. The owners of these vessels and the associated LLP license could choose to convert the LLP license to an inshore CV license or retain the C/P endorsement and remain in the offshore sector. Compared to the 2008 through 2012 qualifying period, the number of LLP licenses completely inactive GOA non-Rockfish Program trawl fisheries decreased from 44 to 20. That decrease means that 24 LLP licenses were only active in the non-Rockfish Program trawl fisheries from 2003 through 2007.

Table 6 Number of GOA groundfish trawl LLP Licenses that were inactive in the GOA non-Rockfish Program trawl fisheries in the GOA from 2003 through 2012

		Western Gulf Gear Endorsements				Total
		None	Non-trawl	Non-trawl & Trawl	Trawl	
Central Gulf Gear Endorsements	C/P	3(1)	1	1(0)		5(2)
	None					
	Non-trawl & Trawl			1	1(0)	2(1)
	Trawl	3(1)				3(1)
	CV	6	2	8	2	18
	None				2	2
	Non-trawl				6	6
	Non-trawl & Trawl	5	2	2		9
	Trawl	1				1
	Grand Total	7	3	8	2	20

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.

Table 7 shows that 132 of the 152 GOA groundfish LLP licenses with a trawl endorsement were active in the non-Rockfish Program GOA trawl fisheries from 2003 through 2012. In the CV sector, 106 of the 124 total licenses issued in 2015 were active.

Table 7 Number of GOA groundfish trawl LLP Licenses that were active in the GOA non-Rockfish Program trawl fisheries in the GOA from 2003 through 2012

		Western Gulf Gear Endorsements				
		None	Non-trawl	Non-trawl & Trawl	Trawl	Total
Central Gulf Gear Endorsements	C/P	4		1	18	23
	N				7	7
	Non-trawl; Trawl	1		1		2
	Trawl	3			11	14
	CV	36(38)	2	46(47)	22	106(109)
	N			4	5	9
	Non-trawl			10		10
	Non-trawl; Trawl	23	2	32(33)		57(58)
	Trawl	13(15)			17	30(32)
	Grand Total	42	2	48	40	132

Source: NMFS RAM LLP data and AKFIN summaries of catch accounting data.