

**Gulf of Alaska Trawl Bycatch Management
Western GOA Outreach Meeting Summary
Sand Point, AK | January 19, 2016**

In response to stakeholders' request, the North Pacific Fishery Management Council (Council) facilitated an outreach meeting with Western Gulf of Alaska (WGOA) trawl fishery participants, including vessel operators, processors, and community representatives. The vessel operators in attendance largely represent the fleet of vessels that are less than or equal to 58' in length, or – as they describe it – the local fleet.¹ The meeting took place on January 19, 2016 in Sand Point, AK, prior to the opening of the groundfish trawl fisheries on January 20th. The Council was represented by Chairman Dan Hull (AK), Alaska Department of Fish & Game staff Nicole Kimball, and Council staff Sam Cunningham. In addition to those attending in person, the conversation was joined by teleconference participants from King Cove, AK, Anchorage, AK, and Seattle, WA.²

The meeting was scheduled in order to provide stakeholders who did not anticipate being available to attend the Council's February meeting in Portland, OR with the opportunity to address Council members and staff with their questions and opinions about the present range of alternatives for the GOA Trawl Bycatch Management Program. The meeting facilitators went in with the intention of describing the alternatives, providing clarification on details and processes, and receiving input that could be carried back to the Council.

This document should serve as Council staff's summation of the major discussion themes, but is not a comprehensive transcription of all that was said. Attendees made it known that they, or their representatives, were prepared to transmit their personal opinions to the Council at the February meeting in Portland, OR, or by written public comment.

The discussion can be broken down to the following themes:

1. Public input and Council process
2. Prohibited Species Catch (PSC) limits and PSC limit reduction
3. General comments about quota-based management, or "rationalization"
4. The four existing alternatives under consideration by the Council
5. License Limitation Program (LLP) license "recency" and "new entry"
6. Issues that are unique or of particular concern to the Western GOA trawl fleet

As is expected with any major Council initiative, there is some degree of overlap between the topics listed above. *The summation comments that follows reflect the opinions of the stakeholders who participated in the outreach meeting, and not necessarily those of the Council representatives who provide the following summary.*

¹ The harvest representatives in attendance draw a distinction between themselves and other harvesters with larger vessels that also participate in trawl fisheries in the Bering Sea and Aleutian Islands.

² A full list of participants who identified themselves is included at the end of this document.

Public input and Council Process

The facilitators were clear about the fact that the Council is not prepared to make major decisions regarding the narrowing of alternatives as the February 2016 meeting. The purpose of that meeting is to further scope several issues of particular interest, and to provide a first opportunity for feedback on Alternative 3, which was first introduced in October 2015. The Council acknowledges that public input on this alternative is important, but that decisions should follow a complete review of the range of alternatives. Such a review will be in the form of an Environmental Impact Statement (EIS) that is targeted for initial review in October or December of 2016. Stakeholders attending the meeting made clear that they felt strongly about the new alternative (Alternative 3), and that they thought that their feedback should be made known to the Council early in the process, regardless of whether or not policy decisions were being made.

Meeting attendees requested that the Council plan for an additional outreach meeting in Sand Point, AK prior to the initial review of the draft EIS. The WGOA participants conveyed a strong preference for initial review in December due to the fact that few fishermen could cease fishing activity during the fall pollock and Pacific cod seasons.

PSC limits and limit reductions

Trawl stakeholders emphasized that some amount of PSC must be made available to the fleet in order for seafood products to be delivered at a reasonable price in a globally competitive market. If PSC limits continue to be reduced from their present levels, the WGOA fleet might not be able to continue fishing and delivering groundfish at present levels. Participants emphasized that the Council and analysts should take into account the available information on external factors that could influence the rate of PSC encounters in the GOA, specifically noting environmental factors (e.g., ocean temperatures), and human inputs such as hatchery releases in the Pacific Northwest. Participants also expressed their interest in receiving continuing refinements on the genetic stock composition of GOA trawl bycatch; some stated that Chinook salmon encounter in the Pacific cod fishery is a relatively recent development.

WGOA stakeholders noted that, among the GOA trawl participants, they are the most reliant upon late-season (fall) pollock and Pacific cod fisheries. When GOA-wide trawl PSC closures are enacted, they consider themselves to be the most vulnerable and most heavily impacted.

In light of their reliance on some amount of PSC to harvest groundfish stocks, meeting attendees stated their opposition to reducing PSC limits at the inception of a new program. Rather, they would prefer a “cooling off period” in order to examine the effects of cooperative management and assess whether further reductions are needed or are feasible. Trawlers highlighted the volatile nature of the existing catch estimation sampling procedure as a reason not to lower PSC limits to the average level of historical use, given the possibility of “lightning strike” bycatch encounters immediately curtailing the fishery.

General comments on rationalization

Those attending the meeting did not reach a consensus on the extent to which issuing groundfish quota would increase the value of the WGOA trawl fishery. Trawlers and processors alike identified several new and higher value product forms that could be developed if deliveries occurred on a predictable and controllable schedule. That being said, participants noted that price levels are highly dependent on a

global market, so value gains could be limited. Most participants did not anticipate achieving increased harvest value under Alternative 3, while some did see that as a possibility under Alternative 2. Some fishermen with experience in the Central GOA Rockfish Program and the Bering Sea pollock fishery attested to the benefits of cooperative quota management in terms of allowing harvesters and processors to work together and share profits on new product ventures.

Trawlers were generally concerned about increased monitoring and management costs. Discussion regarding observers is summarized below. In regards to cooperative management, some participants stated that a cooperative manager for the WGOA might not necessarily need to be a high-paid full-time position given that the fleet is already somewhat organized around two processing plants and several well-known fishing areas.

Vessel operators noted the tension between the desire to avoid consolidation while also providing avenues for new entrants. Some were skeptical of whether an independent new entrant could make a WGOA operation viable unless the vessel was owned by a processing company. Attendees tended to view “new entry” in the WGOA as current skippers and crew rising through the ranks to achieve financial equity in an existing operation.

In a similar vein, the attendees were conflicted on whether current participation levels in the fishery should be preserved through regulation – in perpetuity – or whether such measures would forgo future growth opportunities.

Several meeting attendees expressed that the transferability of PSC quota does not benefit the resource. In opposition, others stated that non-transferable individual PSC allowances do not give fishermen a realistic chance to work around “lightning strike” bycatch events, and would unduly close the fishery (under Alternative 1) or shut down particular operations (under Alternatives 2 and 3).

Alternatives

Alternative 1

WGOA trawlers stated that taking “no action” would not preserve the status quo, as consolidation is already occurring in the fishery and the PSC limit reductions that have already been implemented are having unpredictable effects on the length of the season.

Alternative 2

WGOA stakeholders generally supported the option to “regionalize” harvest quota. They also supported additional provisions that would allow active skippers to receive a portion of target species catch history.

Some stakeholders noted that allowing cooperatives to manage and internally transfer PSC quota would permit vessels to harvest during times that are relatively less “clean”, but that further the cooperative’s objective of increasing value by spreading out the timing of harvest. Under Alternative 2, vessels could fish during these times without bearing an individual cost of accruing PSC that would close them out of the fishery early.

Some stakeholders expressed concern that the established control dates would not accurately reflect the fishery and WGOA harvest (in relation to the Central GOA). Harvesters stated that the fishery has recently changed because higher TAC levels and longer seasons have allowed the fleet to return to areas that were not practical to fish during the proposed qualifying periods. The main concern among WGOA trawlers was that regional allocations based on years prior to 2013 would not accurately reflect proportional activity in the WGOA and the Central GOA; this could hinder the development of under-exploited shoreside flatfish and rockfish markets in the WGOA.

Some stated that historically based allocations generally favor individual license holders who did not attempt to avoid PSC in the past. This benefit would be exacerbated if PSC allocations are transferable.

Some attendees opposed any allocation on the basis that the GOA program would result in some license holders with catch history deriving financial benefits while not remaining active in the fishery. A few among those individuals favored the “no action” alternative (Alternative 1), but also requested measures to prevent Central GOA harvesters from increasing their effort in the WGOA if the Central GOA is rationalized.

Alternative 3

WGOA harvesters generally did not support Alternative 3. The majority of meeting attendees stated that a program without target species allocation would not mitigate the race for fish, would not limit consolidation (relative to that which is occurring under the status quo), and would not provide an opportunity to increase harvest value that sufficiently outweighs the additional costs of monitoring and cooperative management. If the Council were to pursue Alternative 3, the stakeholders attending the meeting requested that PSC allocation based on historical groundfish landings be analyzed. If the Council were to pursue PSC allocation based on “equal shares,” stakeholders are generally in favor of a new round of LLP license “recency.”

The “equal shares” approach elicited concerns about “new” vessels entering the fishery for a minimal amount of time with the sole purpose of bringing more PSC to the cooperative. If an “equal shares” approach is selected, the Council should ensure that cooperatives are able to internally transfer PSC in order to keep historically dependent vessels active in the fishery throughout the year, to the extent possible.

Alternative 4

The meeting attendees expressed general opposition to this alternative (specifically to Community Fisheries Associations), though no significant discussion time was dedicated to this topic.

LLP recency and new entry

WGOA fishermen in attendance generally agreed that they wanted the active fleet to remain as “local” as possible. Some stated that the only viable new entrants would be either vessels already active in the Bering Sea that could acquire a latent GOA license, or vessels owned by a processing company. These views were expressed in specific regards to the “equal shares” option under Alternative 3.³

Most attendees supported the addition of some license “recency” action under both Alternative 2 or 3, even though they acknowledged that Alternative 2 would include some limitations on licenses without qualifying catch history (i.e., they would bring no annual harvest quota to a cooperative or the Limited Access sector). Regarding Alternative 2, some participants were concerned that well-funded operations might be able to purchase both latent licenses and severed catch history, especially if the historical “local” operators cannot afford to continue fishing under increased monitoring costs.

The WGOA harvesters in attendance were in general agreement that new entry from inexperienced or unfamiliar operators would pose a threat to fleet-wide PSC levels.

Observer coverage and monitoring issues

Harvesters in attendance were in consensus that 100% observer coverage was not financially feasible for the WGOA trawl fleet. Participants encouraged staff to analyze the increased cost of coverage at a regional level, and encourage the Council to consider whether the marginal improvement in fishery data merits the additional individual costs. Several participants asserted that 100% coverage would eliminate a crew position on each vessel.

Within the discussion of observer costs, several attendees asserted that paying a daily rate for full observer coverage would affect fishing behavior. Fishermen might not be willing to abide by bycatch avoidance plans if they were paying an observer for days on which they did not fish. Participants linked this discussion to safety concerns, stating that operators might go back out to sea in unfavorable conditions if they had contracted an observer for a predetermined length of time.

Many vessel operators were in favor of the Council examining the use of electronic monitoring (EM) alongside a requirement for full groundfish retention. Some noted that EM would not provide the biological data that could be collected by a human observer, and were open to taking human samplers to the extent that would meet that data need. Others noted that, with full retention, shore-based observers/samplers could collect biological data.

The harvesters in attendance offered many comments about the existing system of PSC estimation (“basket sampling”). Participants understood the theory behind sampling and extrapolation, but were generally of the opinion that the approach is not well suited to PSC limits that are applied essentially in real-time.⁴

³ There was some unresolved discussion as to whether new operations would emerge under Alternative 3 (equal PSC shares) given that no such new effort has emerged under the existing Limited Access regime, where active participants essential share equally (albeit competitively) in an area-wide PSC limit.

⁴ In other words, as stated by a participant, the system would work better if PSC levels were assessed over a 5 or 10 year time period, as opposed to a daily or weekly time-scale.

Issues unique to the Western GOA trawl fleet

(The preparer of this document acknowledges that all opinions expressed during this outreach meeting are, to some extent, unique to the WGOA trawl fleet, processors, and communities.)

Participants highlighted two specific opportunities to reduce PSC in the WGOA. The first, which is included in the Council's alternatives, is to change the seasonal apportionment of pollock to make more harvest available early in the year, which Chinook salmon PSC rates tend to be lower. However, small-boat trawlers expressed some concern that extending the A/B season to June 10 would mainly benefit larger vessels (typically those that also operate in the Bering Sea), since most 58' vessels prosecute salmon fisheries in the summer. The second opportunity is to examine the reopening of historically fished areas that were closed for Steller sea lion (SSL) protection. This could provide skippers with more opportunities to find "clean" tows, and might also decrease operating costs.

The harvest stakeholders in attendance stated that they do not have the financial resources to conduct the type of bycatch avoidance research that is being conducted by Bering Sea – or even Kodiak-based – participants (e.g., excluder net testing). Some individuals stated that they could not afford to purchase an excluder net if they did not know with certainty that it would be effective in their fishery. In general, the meeting attendees emphasized the difference in the scale of their operations as compared to other Alaska trawlers; some individuals noted that they did not have the revenue benefits of existing "catch share" programs, such as the Central GOA Rockfish Program or the Bering Sea pollock fishery (American Fisheries Act).

Some attendees stated that PSC "hot spot" closures would not be an effective tool for the WGOA, since the bulk of the fishery tends to occur in a few known places of groundfish aggregation.

In regards to community stability, some stakeholders emphasized that vessel consolidation would impose a serious cost on Sand Point and King Cove, as crew jobs are among the best work opportunities in those areas. It was also noted that that crew who thrive on trawl/pot/seine combination vessels are uniquely skilled and not easily replaced.

Meeting attendance

In Person:

- 18 WGOA trawl harvesters and processor representatives
- 4 Aleutians East Borough or Sand Point community representatives
- 3 Council/ADFG representatives

Via Teleconference:

- 5 harvester, processor, and community (Harbor Master) representatives in King Cove, AK
- 1 processor representative in Seattle, WA
- 2 Aleutians East Borough and Sand Point community representatives in Anchorage, AK