### **C6 ABM DISCUSSION PAPER**

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#### OVERVIEW OF DISCUSSION PAPER TOPICS

		EBS shelf trawl	survey index (t)
		Low < 130,000	High ≥ 130,000
	High ≥ 11,000	Medium 1,745 mt	High 2,207 – 2,325 mt
IDLIC		(current limit)	(15% above current limit or 2015 limit)
IPHC setline survey index in Area	Medium 8,000 – 10,999	Low 1,309 – 1,483 mt	Medium 1,745 mt
4ABCDE (WPUE)		(15-25% below current)	(current limit)
	Low < 8,000	Very Low 1,047 – 1,222 mt	Low 1,309 – 1,483 mt
		(30-40% below current)	(15-25% below current)

3 items requested by Council (February 2020)

- Evaluation of lookup table for setting PSC limits
- 2. Consideration of performance standard tied to status quo limit
- 3. CDQ compensation concept



#### LOOK UP TABLE FOR SETTING PSC LIMITS

Table 2-1 Council's proposed look-up table for the A80 halibut PSC limit. IPHC Setline survey values in weight-per-unit-effort (WPUE) while EBS trawl survey is in metric tons (t)

		EBS shelf trawl survey index (t)			
		Low < 130,000	High ≥ 130,000		
	High ≥ 11,000	Medium 1,745 mt	High 2,207 – 2,325 mt		
IPHC setline		(current limit)	(15% above current limit or 2015 limit)		
survey index in Area 4ABCDE	Medium 8,000 – 10,999	Low 1,309 – 1,483 mt	Medium 1,745 mt		
(WPUE)		(15-25% below current)	(current limit)		
	Low < 8,000	Very Low 1,047 – 1,222 mt	Low 1,309 – 1,483 mt		
		(30-40% below current)	(15-25% below current)		



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		EBS shelf trawl survey index (t)			
		Low	High		
		< 130,000	≥ 130,000		
	High	Medium	High		
	≥ 11,000	1,745 mt	2,207 – 2,325 mt		
			(15% above current limit		
IPHC setline		(current limit)	or 2015 limit)		
survey index	Medium	Low	Medium		
in Area	8,000 – 10,999	1,309 – 1,483 mt	1,745 mt		
4ABCDE					
(WPUE)		(15-25% below current)	(current limit)		
	Low	Very Low	Low		
	< 8,000	1,047 – 1,222 mt	1,309 – 1,483 mt		
		(30-40% below current)	(15-25% below current)		





Table 2-1 Council's proposed look-up table for the A80 halibut PSC limit. IPHC Setline survey values in weight-per-unit-effort (WPUE) while EBS trawl survey is in metric tons (t)

		EBS shelf trawl	survey index (t)
		Low < 130,000	High ≥ 130,000
	High	Medium	High
	≥ 11,000	1,745 mt	2,207 – 2,325 mt
			(15% above current limit
IPHC setline		(current limit)	or 2015 limit)
survey index	Medium	Low	Medium
in Area	8,000 - 10,999	1,309 – 1,483 mt	1,745 mt
4ABCDE			
(WPUE)		(15-25% below current)	(current limit)
	Low	Very Low	Low
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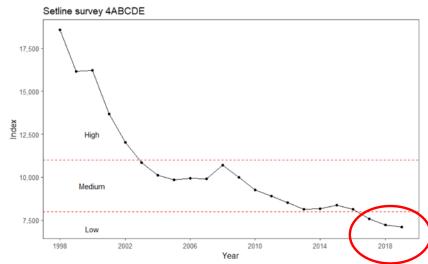


Figure 2-3 Setline survey 4ABCDE Index 1998-2019 (as reported in February 2020). Red line indicates breakpoints of Low, Medium, and High states as proposed in look-up table.

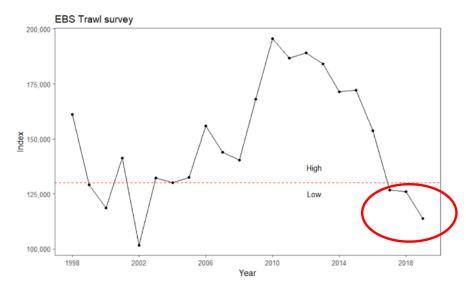
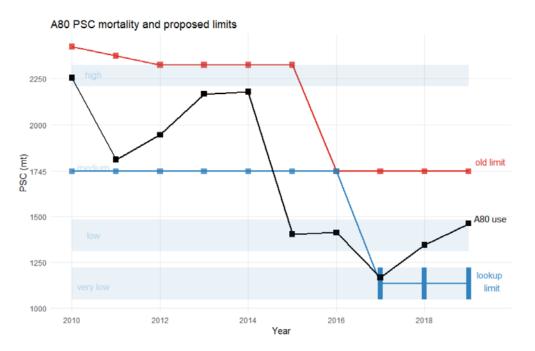


Figure 2-2 EBS trawl survey index 1998-2019 (as reported in February 2020). Red line indicates breakpoint between Low and High states as proposed in look-up table.





# HISTORICAL CALCULATION OF LIMITS AND MORTALITY BASED ON LOOK UP TABLE AND SURVEYS



-4 A80 PSC mortality ('A80 use'), existing PSC limits ('old limit'), and new limits that would have been applied based on survey indices as proposed in look-up table. Light blue bands show lookup table states for reference.

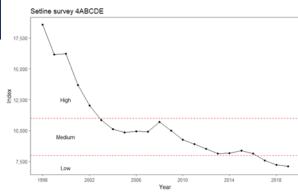


Figure 2-3 Setline survey 4ABCDE Index 1998-2019 (as reported in February 2020). Red line indicates breakpoints of Low, Medium, and High states as proposed in look-up table.

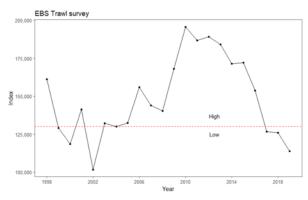


Figure 2-2 EBS trawl survey index 1998-2019 (as reported in February 2020). Red line indicates breakpoint between Low and High states as proposed in look-up table.



Table 2-2 Historical survey indices and corresponding PSC limit states (High/Medium/Low/VeryLow) based on "Look-up Table," PSC limits, and A80 PSC use (highlighted cells = A80 sector would/could have reached the limit)

	l .	Survey CDE	EBS T Surv						
Year	Index (WPUE)	State	Index (mt)	State	Look-up Table State	"New" PSC Limit			
1998	18,577	High	161,256	High	High	2,207 – 2,325			
1999	16,155	High	129,116	Low	Medium	1,745			
2000	16,207	High	118,677	Low	Medium	1,745			
2001	13,681	High	141,219	High	High	2,207 - 2,325			
2002	12,037	High	101,706	Low	Medium	1,745			
2003	10,862	Medium	132,151	High	Medium	1,745			
2004	10,128	Medium	130,075	High	Medium	1,745			
2005	9,856	Medium	132,518	High	Medium	1,745			
2006	9,932	Medium	155,964	High	Medium	1,745			
2007	9,922	Medium	143,903	High	Medium	1,745			
2008	10,714	Medium	140,247	High	Medium	1,745	Ame	endment 80 P	SC (mt)
2009	9,989	Medium	168,102	High	Medium	1,745	Limit	Encounter	Mortality
2010	9,271	Medium	195,535	High	Medium	1,745	2,425	2,823	2,254
2011	8,896	Medium	186,666	High	Medium	1,745	2,375	2,277	1,810
2012	8,539	Medium	189,000	High	Medium	1,745	2,325	2,469	1,944
2013	8,133	Medium	183,989	High	Medium	1,745	2,325	2,677	2,166
2014	8,173	Medium	171,427	High	Medium	1,745	2,325	2,667	2,178
2015	8,385	Medium	172,237	High	Medium	1,745	2,325	1,719	1,404
2016	8,134	Medium	153,704	High	Medium	1,745	1,745	1,965	1,412
2017	7,583	Low	126,684	Low	Very Low	1,047 - 1,222	1,745	1,976	1,167
2018	7,228	Low	125,957	Low	Very Low	1,047 – 1,222	1,745	2,555	1,343
2019	7,104	Low	113,855	Low	Very Low	1,047 – 1,222	1,745	3,067	1,461



Table 2-3 Comparison of survey index statistics with proposed breakpoints

		Proposed Breakpoints						
Survey	Years	Average	25th percentile	Median	75th percentile	Low	Medium	High
Setline	1998-2019	10,432	8,226	9,889	10,825	< 8,000	8,000 –	≥ 11,000
Settiffe	2010-2019	8,145	7,721	8,154	8,501		10,999	
EBS	1998-2019	148,818	129,356	142,561	170,596	< 130,000	NA ≥	> 120,000
Trawl	2010-2019	161,905	133,439	171,832	185,997			≥ 130,000

Table 2-1 Council's proposed look-up table for the A80 halibut PSC limit. IPHC Setline survey values in weight-per-unit-effort (WPUE) while EBS trawl survey is in metric tons (t)

		EBS shelf trawl survey index (t)				
		Low < 130,000	High ≥ 130,000			
		,	_ ,			
	High	Medium	High			
	≥ 11,000	1,745 mt	2,207 – 2,325 mt			
			(15% above current limit			
		(current limit)	or 2015 limit)			
IPHC setline		(editent innit)				
survey index	Medium	Low	Medium			
in Area	8,000 – 10,999	1,309 – 1,483 mt	1,745 mt			
4ABCDE						
(WPUE)		(15-25% below current)	(current limit)			
	Low	Very Low	Low			
	< 8,000	1,047 - 1,222  mt	1,309 – 1,483 mt			
			.,			
		(30-40% below current)	(15-25% below current)			



## SURVEY DATA UPDATES AND PSC LIMIT VOLATILITY

Table 2-5 Relative changes in the IPHC setline survey 'state' when using 2019 data versus 2018 data for use in the proposed look-up table (Table 2-1)

		Survey	EBS Trav	vl Survey		19 setline		Survey		
	4ABCD	E (2019)			in	index		E (2018)	Using 2018 s	etline index
Year	Index (mt)	Category	Index (mt)	Category	Combined Category	New Limit	Index (mt)	Category	Combined Category	New Limit
1998	18,577	High	161,256	High	High	2,207-2,325	18,502	High	High	2,207-2,325
1999	16,155	High	129,116	Low	Medium	1,745	16,201	High	Medium	1,745
2000	16,207	High	118,677	Low	Medium	1,745	16,203	High	Medium	1,745
2001	13,681	High	141,219	High	High	2,207-2,325	13,780	High	High	2,207-2,325
2002	12,037	High	101,706	Low	Medium	1,745	12,104	High	Medium	1,745
2003	10,862	Medium	132,151	High	Medium	1,745	10,866	Medium	Medium	1,745
2004	10,128	Medium	130,075	High	Medium	1,745	9,987	Medium	Medium	1,745
2005	9,856	Medium	132,518	High	Medium	1,745	9,550	Medium	Medium	1,745
2006	9,932	Medium	155,964	High	Medium	1,745	9,802	Medium	Medium	1,745
2007	9,922	Medium	143,903	High	Medium	1,745	9,673	Medium	Medium	1,745
2008	10,714	Medium	140,247	High	Medium	1,745	10,264	Medium	Medium	1,745
2009	9,989	Medium	168,102	High	Medium	1,745	9,834	Medium	Medium	1,745
2010	9,271	Medium	195,535	High	Medium	1,745	9,146	Medium	Medium	1,745
2011	8,896	Medium	186,666	High	Medium	1,745	8,669	Medium	Medium	1,745
2012	8,539	Medium	189,000	High	Medium	1,745	8,403	Medium	Medium	1,745
2013	8,133	Medium	183,989	High	Medium	1,745	7,989	Low	Low	1309-1483
2014	8,173	Medium	171,427	High	Medium	1,745	7,995	Low	Low	1309-1484
2015	8,385	Medium	172,237	High	Medium	1,745	8,130	Medium	Medium	1,745
2016	8,134	Medium	153,704	High	Medium	1,745	7,826	Low	Low	1309-1483
2017	7,583	Low	126,684	Low	Very Low	1,047-1,222	7,250	Low	Very_Low	1,047
2018	7,228	Low	125,957	Low	Very Low	1,047-1,222	7,141	Low	Very_Low	1,047
2019	7,104	Low	113,855	Low	Very Low	1,047-1,222				





#### **PSC LIMIT VOLATILITY**

2011-2016: larger survey differences = same PSC

8,896	- 8,	134	=762
Mediu	m		

186,666 -153,704 =32,962 High

	4ABCDE (2019)					
r	Index	(mt)	Category	I		
2011	8	,896	Medium			
2012	8	,539	Medium			
2013	8	,133	Medium			
2014	8	,173	Medium			
2015	8	,385	Medium			
2016	8	,134	Medium			
2017	7	,583	Low			
2018	7	,228	Low			
2019	7	,104	Low			

Setline Survey

	EBS Trav	wl Survey	Using 2019 setline index		
I	ndex (mt)	Category	Combined Category	New Lim	
	186,666	High	Medium	1,74	
	189,000	High	Medium	1,74	
	183,989	High	Medium	1,74	
	171,427	High	Medium	1,74	
	172,237	High	Medium	1,74	
	153,704	High	Medium	1,74	
	126,684	Low	Very Low	1,047-1,22	
	125,957	Low	Very Low	1,047-1,22	
	113,855	Low	Very Low	1,047-1,22	

PSC=1,745





#### **PSC LIMIT VOLATILITY**

2011-2016: larger survey differences = same PSC

2016-2017: smaller survey differences = different PSC

8,896 - 8,134=762 Medium		Setlin 4ABCI
	Vear	Index (mt)
186,666 - 153,704 = 32,962	2011	8,896
High	2012	8,539
	2013	8,133
8,134 - 7,583=551	2014	8,173
Medium → Low	2015	8.385
1 16didiii — 26 W	2016	8,134
153,704 -126,684=27,020	2017	7,583
	2018	7,228
High→ Low	2019	7,104

		Survey E (2019)	EBS Trav	wl Survey	Using 2019 setline index		
	Index (mt)	Category	Index (mt)	Category	Combined Category	New Limit	
1	8,896	Medium	186,666	High	Medium	1,745	
2	8,539	Medium	189,000	High	Medium	1,745	
3	8,133	Medium	183,989	High	Medium	1,745	
1	8,173	Medium	171,427	High	Medium	1,745	
5	8.385	Medium	172.237	High	Medium	1,745	
5	8,134	Medium	153,704	High	Medium	1,745	
7	7,583	Low	126,684	Low	Very Low	1,047-1,222	
8	7,228	Low	125,957	Low	Very Low	1,047-1,222	
9	7,104	Low	113,855	Low	Very Low	1,047-1,222	

PSC=1,745

PSC=1,047-1,222



#### EFFECT OF TERMINAL SURVEY YEAR

Table 2-5 Relative changes in the IPHC setline survey 'state' when using 2019 data versus 2018 data for use in the proposed look-up table (Table 2-1)

		Survey E (2019)	EBS Trav	vl Survey		Using 2019 setline index		_		Setline Survey 4ABCDE (2018)		Using 2018 setline index	
Year	Index (mt)	Category	Index (mt)	Category	Combined Category	New Limit	Index (mt)	Category	Combined Category	New Limit			
2012	8,539	Medium	189,000	High	Medium	1,745	8,403	Medium	Medium	1,745			
2013	8,133	Medium	183,989	High	Medium	1,745	7,989	Low	Low	1309-1483			
2014	8,173	Medium	171,427	High	Medium	1,745	7,995	Low	Low	1309-1484			
2015	8,385	Medium	172,237	High	Medium	1,745	8,130	Medium	Medium	1,745			
2016	8,134	Medium	153,704	High	Medium	1,745	7,826	Low	Low	1309-1483			
2017	7,583	Low	126,684	Low	Very Low	1,047-1,222	7,250	Low	Very_Low	1,047			
2018	7,228	Low	125,957	Low	Very Low	1,047-1,222	7,141	Low	Very_Low	1,047			
2019	7,104	Low	113,855	Low	Very Low	1,047-1,222							

- Setline index changed when 2019 data added
- New index values would have changed the survey 'state' and PSC limit in 2013, 2014, 2016 (highlighted in yellow)



#### POLICY CHOICES IN LOOK UP TABLE

- Dimensions of look-up table
- Breakpoints
- PSC limit values



## PSC LIMITS EMPLOYING BREAKPOINTS IN BSAI

- Chinook salmon bycatch management program (A91/110)
  - Lower limits in years of 'low Chinook abundance'
  - Threshold for determination based on natural break in data (3-River Index and western AK adult equivalents)
  - 2 issues when re-examined in 2018:
    - Natural break in data less obvious when updated AEQ are included
    - New model for Kuskokwim run which when updated historically indicated different perception of low years then when A110 final action taken

- Bristol Bay red king crab and EBS Tanner crab PSC limits
- BBRKC
  - Stairsteps set based on threshold in the State harvest strategy
- Tanner crab
  - Stairsteps negotiated by industry workgroup based on historical bycatch levels



## PSC LIMIT FROM LOOK UP TABLE IMPLEMENTATION ISSUES

- Timing issues with specifications process
  - October/December Council specifications
  - November interim/January annual IPHC meetings and data availability
- Setting annual PSC limits in the absence of 1 or more years of survey data
  - Council would need to indicate what data (or average thereof) should be used in the absence of a survey year(s)



## A80 SECTOR HALIBUT CATCH (ENCOUNTER), MORTALITY (PSC)

- Both surveys display downward abundance trends
- Halibut catch and mortality (PSC) follow similar trajectories from 2010 through 2015
- Since 2015 halibut catch has increased at a greater rate than mortality
  - changes in catch accounting and fish handling procedures described in the DEIS

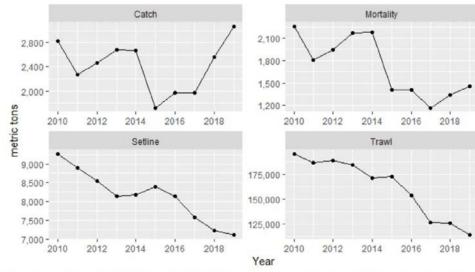


Figure 2-5 A80 halibut catch and mortality (top panels) and setline and trawl survey indices (bottom panels), 2010 through 2019



#### PSC ENCOUNTER BY TARGET

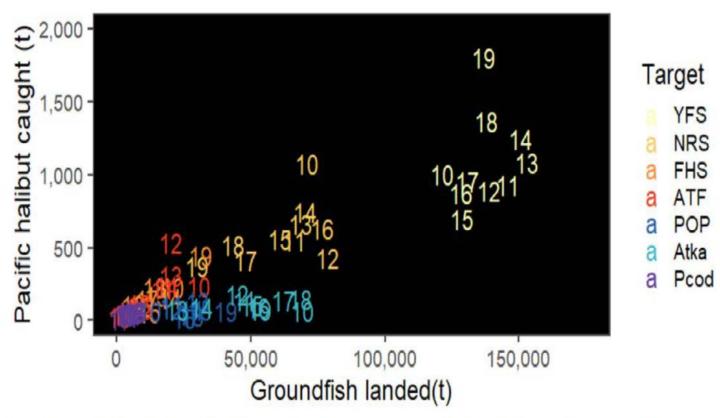
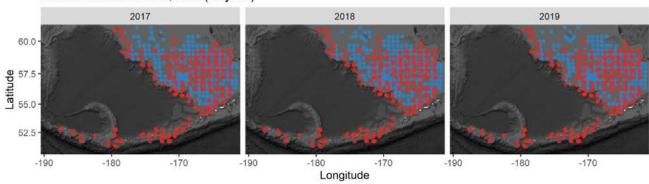




Figure 2-7 A80 sector bycatch of Pacific halibut (t) versus groundfish catch by target species, 2010 through 2019

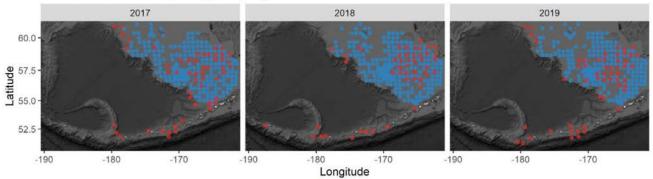
### SPATIAL OVERLAP: A80 FISHERY, EBS SURVEY

Halibut locations EBS, A80 (all year)



EBSA80

Halibut locations EBS, A80 (June, July)





ADF&G statistical areas where halibut PSC occurred in the A80 fishery overlaid on areas where the EBS trawl survey (EBS) encountered halibut, 2017 through 2019. Top panel shows areas with A80 halibut catch throughout the year; bottom panel show areas with A80 halibut catch for the months during which the EBS trawl survey typically occurs.



- Static "base" PSC limit of 1,745 t (status quo)
- Performance standard thresholds
  - Option 1: 80% of 1,745 t (1,396 t)
  - Option 2: 90% of 1,745 t (1,571 t)
- If threshold met in 3 of most recent 5 years
  - Full PSC limit 1,745 t available
- If threshold not met, available PSC is
  - Option 1: 80% (1,396 t)
  - Option 2: 90% (1,571 t)
- Performance standard applies only when IPHC Area 4CDE directed fishery catch limit <2 mil lbs</li>



Option 1: 80% of 1,745 t (1,396t)

- Performance standard not met in any years
  - but does not apply in 2019 (catch limit>2 mil lbs)

A80 PSC Mortality, limit and performance standard

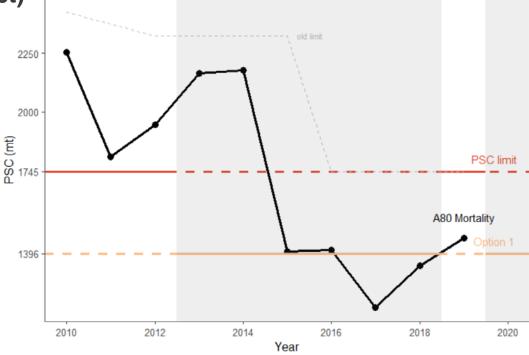




Figure 3-2 A80 PSC mortality and potential PSC limits under performance standard annual threshold Option 1. Grey box indicates years when 4CDE TAC was less than 2 million pounds (performance standard could apply). Solid red and orange lines indicate PSC limit that would have been applied based on the performance standard.

Option 2:90% of 1,745 t (1,571 t)

- Performance standard met 2015-2019
  - Full limit applies in 2018-2020

#### A80 PSC Mortality, limit and performance standard

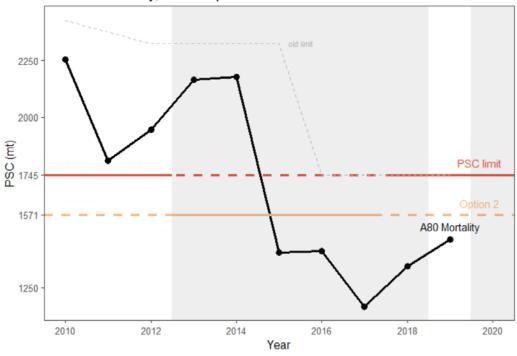


Figure 3-3

A80 PSC mortality and potential PSC limits under performance standard annual threshold Option 2. Grey box indicates years when 4CDE TAC was less than 2 million pounds (performance standard could apply). Solid red and orange lines indicate PSC limit that would have been applied based on the performance standard.





 Threshold could effectively codify recent achievements or drive further reductions

Table 3-2 A80 Halibut PSC mortality (t) and total groundfish catch (1,000 t), 2010 through 2020\*

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020*
A80 PSC	2,254	1,810	1,944	2,166	2,178	1,404	1,412	1,167	1,343	1,461	646
% of 80% Std.	161%	130%	139%	155%	156%	101%	101%	84%	96%	105%	46%
% of 90% Std.	143%	115%	124%	138%	139%	89%	90%	74%	85%	93%	41%
A80 GF Catch	305.2	302.2	307.4	306.8	308.0	289.2	298.4	278.8	290.2	288.3	-

<sup>\* 2020</sup> year to date through August 4, 2020

- Limitations of using past performance to project future PSC use
- Heterogeneous effects within sector



## CHINOOK SALMON PERFORMANCE STANDARD IN EBS POLLOCK FISHERY

- Overall sector level PSC limits and an annual threshold <PSC limit
  - Annual threshold intended to reduce bycatch at all levels of encounters
  - To access full PSC limit cannot exceed the annual threshold > 2x in a rolling 7 years [Performance Standard]
  - If a sector fails this performance standard it's PSC limit in all years will be fixed at the lower level

- Performance standard is defined in regulation and tied to operation under the Incentive Plan Agreements (IPA) proposed by industry.
- IPAs are required to report annually to the Council on specific performance related to measures that are intended to be included within the structure of each IPA
  - Including salmon excluders, vessel level incentives, rolling hot spots etc.





### GOA NON-POLLOCK CHINOOK PERFORMANCE STANDARD

$$7,500 \ Chinook = 3,600 \ CP + (2,700 \ NRPCV + 1,200RPCV)$$

48%

36%

16%

Threshold: @  $6,500 \ Chinook = 3,120 + (2,340 + 1,200)$ 

 $\Delta 480$ 

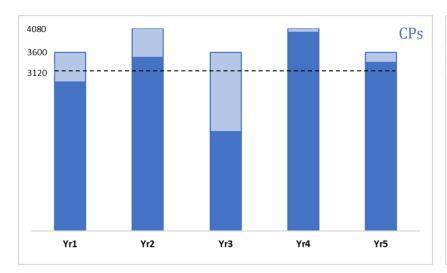
 $\Delta 360$ 

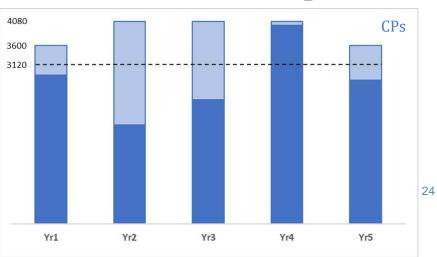
Limit w/Buffer: CP = 4,080 NRPCV = 3,060

Example: If Yr1 PSC < 3,120 then Yr2 Limit = 4,080

Not possible for avg. over 2 consecutive yrs to exceed 3,600:

$$\frac{3,119+4,080}{2}$$
 < 3,600





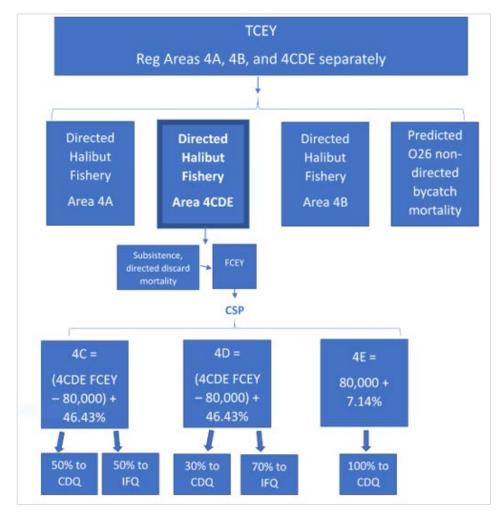
### PERFORMANCE STANDARD: IMPLEMENTATION

- Motion proposes structure as static limit (1,745 t) and reductions from there
- Might not modify A80 PSC limit until some years post-implementation
- Should not impair IPHC's ability to set 4CDE catch limits
- Not likely to substantially alter NMFS inseason management or A80 sector operations during the first month of the A80 year
- If combined with a Look-Up Table, analysts assume that historical attainment RE: "3 out of 5 years" would not be revised if later abundance indices dictate that the Look-Up Table has shifted to a different state



- Intent to shift A80 PSC to Area 4CDE CDQ directed halibut as directly as possible, under certain circumstances
- Proposal maintains a static "base" PSC limit of 1,745 mt
- Assumed that proposed A80 PSC limit reduction per amount 4CDE is below 1 million pounds is "progressive"





	% O26 bycatch	by weight
Year	Straight	Weighted
2010	55.6%	34.2%
2011	64.7%	43.0%
2012	62.5%	50.9%
2013	61.6%	52.4%
2014	63.3%	51.5%
2015	50.0%	38.4%
2016	65.7%	28.2%
2017	70.2%	46.3%
2018	62.5%	49.6%
2019	75.8%	60.5%
Average 2010-2019	69.5%	52.1%

Table 4-3



Figure 4-1

Table 4-1 Area 4CDE catch limit and amount allocated to CDQ groups (1,000 lbs.), 2010 through 2019

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
4CDE Catch Limit	3,580	3,720	2,465	1,982	1,285	1,285	1,660	1,700	1,580	2,040	1,730
4CDE CDQ Reserve	1,630	1,692	1,136	951	569	569	780	798	700	948	811
% CDQ	46%	45%	46%	48%	44%	44%	47%	47%	44%	46%	47%

Table 4-2 Area 4CDE halibut catch limits (total, CDQ) under proposed transfer mechanism when IPHC sets 4CDE at or below 1 million net pounds

Scena	rio	Adjuste	d (lbs.)
4CDE Limit (lbs.)	A80 PSC Limit (t)	4CDE Limit +	4CDE CDQ Reserve
1,000,000	1,745	1,000,000	460,000
900,000	1,695	950,000	437,000
800,000	1,645	900,000	414,000
700,000	1,595	850,000	391,000
600,000	1,545	800,000	368,000
500,000	1,495	750,000	345,000
400,000	1,445	700,000	322,000
300,000	1,395	650,000	299,000
200,000	1,345	600,000	276,000
100,000	1,295	550,000	253,000

A80 PSC Usage						
Tons						
2,254						
1,810						
1,944						
2,166						
2,178						
1,404						
1,412						
1,167						
1,343						
1,461						



Table 4-1 Area 4CDE catch limit and amount allocated to CDQ groups (1,000 lbs.), 2010 through 2019

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
4CDE Catch Limit	3,580	3,720	2,465	1,982	1,285	1,285	1,660	1,700	1,580	2,040	1,730
4CDE CDQ Reserve	1,630	1,692	1,136	951	569	569	780	798	700	948	811
% CDQ	46%	45%	46%	48%	44%	44%	47%	47%	44%	46%	47%

Table 4-2 Area 4CDE halibut catch limits (total, CDQ) under proposed transfer mechanism when IPHC sets 4CDE at or below 1 million net pounds

Scena	rio	Adjusted	l (lbs.)
4CDE Limit (lbs.)	A80 PSC Limit (t)	4CDE Limit +	4CDE CDQ Reserve
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300,000	1,395	650,000	299,000
200,000	1,345	600,000	276,000
100,000	1,295	550,000	253,000

A80 PS	A80 PSC Usage						
Year	Tons						
2010	2,254						
2011	1,810						
2012	1,944						
2013	2,166						
2014	2,178						
2015	1,404						
2016	1,412						
2017	1,167						
2018	1,343						
2019	1,461						



#### Other issues:

- Council/NMFS does not have the authority to accommodate the request absent Congressional action
- Implementation: May require inseason adjustment to A80 PSC limit after IPHC Annual Meeting (similar to Performance Standard)
- General considerations when linking impact of PSC reduction to directed halibut fishery catch



#### ACTION FOR AP AT THIS MEETING

#### DEIS

- Consider purpose and need revisions as necessary
- Provide input on alternatives interpretation or revisions

#### Discussion paper

- Consider incorporation of any of the concepts into the alternatives set for DEIS or as a separate analysis
- Further development of any of the concepts as a separate action

