



# **C1 BSAI Pacific Cod Pot CP LLP Licenses – Public Review**

February 2021 Council Meeting

## **Action Memo**

Council Staff: Sam Cunningham

Other Presenters: Krista Milani & Alicia Miller (NMFS Sustainable Fisheries)

Action Required: Consider designating a preferred alternative

## **BACKGROUND**

The Council will receive the public review analysis of a potential modification to the License Limitation Program (LLP) license endorsements for catcher-processors (CP) using pot gear to fish for Pacific cod in the Bering Sea and Aleutian Islands (BSAI) Fishery Management Plan (FMP) areas. The action alternative under consideration would remove “BSAI Pacific cod pot CP” endorsements from LLP licenses that were not credited with at least 1,000 metric tons of commercially retained cod caught while operating as a pot CP during a defined time period. The Council’s alternative includes options that would apply the 1,000 metric ton threshold to a period running from 2005 through 2019 (Option 1) or from 2012 through 2019 (Option 2). At the Council’s request, NMFS established a control date of December 10, 2019 meaning that any catch occurring after that date might not be considered in regard to evaluating this action alternative. Currently, eight LLP licenses hold the endorsement that allows a CP to fish for Pacific cod in the BS or AI with pot gear. If the Council were to select Option 1 then five LLP licenses would retain the endorsement. Four LLP licenses would retain the endorsement under Option 2.

The BSAI pot CP sector is allocated 1.5% of the initial total allowable catch (TAC) for Pacific cod. That amount can be increased through in-season reallocations of TAC from other gear and operational-type sectors that are not projected to utilize their TAC allocation. Some vessels in this sector also harvest CDQ Pacific cod, and must hold an endorsed LLP license to do so. In recent years, the reduced TAC level for all BSAI Pacific cod sectors has meant that fewer fish are directly available to the pot CP sector and fewer – if any – additional TAC is available through in-season reallocation. As a result, the total volume of the fishery and the length of the fishing season has fallen substantially and continuously since 2017.

The public review draft responds to Council requests and incorporates other necessary additions, including but not limited to: information about options for the future use of LLP licenses that could lose the pot CP endorsement under the action alternative; identification of the communities presently affiliated by ownership with the directly affected LLP licenses; acknowledgment of the potential impact of a recency action on other LLP-limited fisheries; and the cost of additional vessel monitoring requirements that are not necessarily tied to the action alternative but could affect this set of vessels if implemented under existing NMFS authority. Staff will provide a timely update on the 2021 A season as it occurred from January 1 through January 16 using the best data available at the time of the meeting.