

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver  
Executive Director

DATE: January 30, 2007

SUBJECT: BSAI & GOA Trawl LLP Recency Analysis

ESTIMATED TIME 4 HOURS
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**ACTION REQUIRED**

Report on preliminary findings of the analysis.

**BACKGROUND**

This action is intended to address latent capacity by trawl CV LLPs and trawl CP LLPs in the BSAI and GOA groundfish fisheries.

As a part of the presentation concerning this action, the Staff will present a short discussion paper to the Council (**Item C-5(a)**) summarizing the various actions currently before the Council that are intended to modify the License Limitation Program (LLP). These include this action, the BS and AI split for Pacific cod (which includes options to revise Bering Sea and Aleutian Islands area endorsements on all licenses), and GOA Groundfish Management Issues (which could include options to remove latent LLPs from Gulf of Alaska fisheries). The paper is intended to advise the Council concerning potential coordination of these different actions.

Staff also will present a discussion paper concerning various aspects of the ongoing analysis of this action (**Item C-5(b)**). The presentation will be a progress report that describes preliminary findings of the analysis to date. Staff will focus on three specific areas in the presentation. First, NOAA Fisheries has expressed a concern that attributing catch to a license for any time prior to 2000 will complicate implementation of this action substantially. Due to this complication, NOAA Fisheries has suggested that the Council favor options that include catch history from 2000 forward. Second, preliminary results of the analysis showing the number of LLPs that would be excluded under the different alternative and option selections will be reviewed. Third, a short review of the potential economic effects of the alternatives will be presented.

The information presented at this meeting should allow the Council to begin consideration of their preferences for this proposed amendment, and provide the opportunity to revise the alternatives, based on available information.

Staff is still working to complete the Draft RIR/EA/IRFA for initial public review. We will initiate that review at the March/April meeting.

**Summary of ongoing actions to revise the License Limitation Program  
North Pacific Fishery Management Council  
February 2006**

Over the course of several meetings and in response to several concerns, the Council has developed three separate actions intended to modify the License Limitation Program (LLP). These actions are generally intended to both remove latent licenses from fisheries and to qualify licenses for areas that appear to have insufficient capacity. Some aspects of these actions overlap. These overlaps could lead to either redundancy or inconsistencies in Council actions. In addition, overlaps could prolong analyses consuming Council and staff time. This paper reviews the scopes of the three different agenda items addressing LLP revisions. Using this paper, the Council could choose to develop its alternatives in these actions in a manner that will avoid redundancies and inconsistencies and uses its time efficiently.

The first part of this paper briefly reviews the three actions before the Council. The paper goes on to describe areas of overlap. The paper concludes with a few observations concerning potential ways to structure the actions to avoid redundant and inconsistent actions.

**Action to reduce trawl licenses in all areas and add trawl LLP licenses to the Aleutian Islands.**

This action has two parts. The first is intended to remove latent licenses from the trawl sector in the Gulf and Bering Sea and Aleutian Islands (the "trawl LLP action"). The action has options that would apply a minimal threshold of one or two landings during a period of at least six years to retain eligibility. The qualification could be either at a management subarea level (i.e., BS, AI, WG, and CG) or at a management area level (BSAI and GOA). The LLP would not be restructured, but area endorsements would be removed from licenses that had no or very minimal activity in recent years.

The second part of the action would create new endorsements for the Aleutian Islands on catcher vessel licenses that have landings in the parallel or State waters fisheries in the Aleutian Islands (the "AI LLP action"). This action is intended to address a perceived shortage of catcher vessel licenses in the Aleutian Islands, particularly for the Pacific cod fishery.

These two actions address perceived disparities between entry limits and resource abundance. Yet, the two actions serve somewhat cross purposes. The first action is intended to prevent entry of latent capacity from fisheries that are believed to be fully utilized. The second action is intended to add

licenses to a single area that is believed to have an inadequate number of licenses. The appropriateness of combining the two actions into a single regulatory amendment could be questioned.

<p><b>Action to <u>reduce</u> trawl licenses in all areas</b></p> <p><u>Area/Gear/Operation</u></p> <p>BSAI (or BS and AI) trawl CVs <u>and</u> Non-AFA and non-Amendment 80 CPs GOA (or WG and CG) CVs and CPs Options to exclude AFA, Amendment 80 licenses, or vessels under 60 feet</p> <p><u>Eligibility thresholds</u></p> <p>One or two landings from 1995 to 2005 or 2000 to 2005</p> <p>Option to consider non-trawl catch for eligibility</p> <p><b>Action to <u>add</u> trawl licenses to the Aleutian Islands</b></p> <p><u>Area/Gear/Operation</u></p> <p>AI trawl CVs (non-AFA vessels only)</p> <p><u>Eligibility threshold</u></p> <p>One or two landings from 1995 to 2005 or 2000 to 2005 or 1995 – 2006 or 2000 to 2006 in the parallel or State waters of the Aleutian Islands</p>
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**Action to divide Pacific cod Bering Sea/Aleutian Islands allocations into separate Bering Sea allocations and Aleutian Islands allocations and to combine Bering Sea and Aleutian Islands license endorsements into a single Bering Sea/Aleutian Islands endorsement.**

The primary purpose of this action (the "BS/AI Pacific cod allocation action") is to divide the current Bering Sea/Aleutian Islands sector allocations of Pacific cod into Bering Sea allocations and Aleutian Islands allocations (in the event that the Pacific cod TAC and ABC are divided by subarea in a future specification process). As an ancillary part of the action, the Council has developed options that would create a new endorsement for the Bering Sea and Aleutian Islands areas. In effect, each license with a Bering Sea or Aleutian Islands would receive the new endorsement qualifying it for fishing in both the Bering Sea and Aleutian Islands for Pacific cod (the "BSAI Pacific cod LLP action"). This action is intended to address the perceived shortfall in Aleutian Islands endorsed licenses for use in the Aleutian Islands Pacific cod fishery. The primary beneficiary of this change would be catcher vessels, since many catcher vessels with a Bering Sea endorsement do not carry an Aleutian Islands endorsement. Since this action includes the division of allocations between the Bering Sea and Aleutian Islands, the simultaneous consideration of the need for Aleutian Islands licenses in the Pacific cod fishery would allow for coordination of the two actions. Whether the action should qualify all Aleutian Islands licenses for the Bering Sea might be questioned, if the Council's motivation is to increase the number of qualified licenses in the Aleutian Islands.

**Action to divide Pacific cod Bering Sea/Aleutian Islands allocations into separate Bering Sea allocations and Aleutian Islands allocations**

Considers a variety options to divide allocations based on historical catch

**Action to combine Bering Sea and Aleutian Islands license endorsements into a single Bering Sea/Aleutian Islands**

Every license with either a Bering Sea or Aleutian Islands endorsement would receive a Bering Sea/Aleutian Islands endorsement, qualifying the license for use in both areas for Pacific cod

**Action to make sector allocations of Gulf of Alaska Pacific cod and to remove latent licenses from the Gulf of Alaska fisheries.**

This action also has two parts. The first part would divide the various Gulf of Alaska subarea Pacific cod TACs into separate sector allocations (the "Gulf sector split action"). Although yet to be specified, sectors are likely to be defined by gear type, and possibly by operation (catcher vessel/catcher processor) and vessel length. The second part of the action is intended to remove latent licenses from the Gulf fisheries (the "Gulf LLP action"). The specific terms of this action are also undefined at this stage. The action could simply remove latent licenses (in a manner similar to the removal of latent trawl licenses described above). Alternatively, the action could redefine eligibility by defining new endorsements and designations, which parallel the sector allocations for Pacific cod. Since one of the actions defines allocations available to sector members, while the other defines sector eligibility, this package provides a means for considering the interactions between and coordinating the two decisions.

**Action establishing Gulf Pacific cod sector allocations**

Define area/gear/operation/vessel length sectors and determine allocations to those sectors

**Action removing latent licenses from Gulf fisheries**

Define criteria for retaining eligibility to fish in Gulf fisheries – could redefine sectors for license endorsement designation

**Discussion of coordination of these actions.**

This section briefly discusses issues that the Council could consider for coordinating these actions that consider revisions to the LLP. Since the Council has not developed a purpose and need statement or alternatives for the Gulf sector split/Gulf LLP action, the discussion is somewhat speculative concerning the nature of that action and possible alternatives. In any case, conclusions depend on the scope of the Council's alternatives in the various actions. The discussion attempts to address potential revisions to

actions that the Council could consider in development of alternatives, to allow the Council to fashion these actions to address those contingencies.

The trawl LLP action applies a minimal participation threshold for continued eligibility. The Council could continue that aspect of the trawl LLP action without great concern for unanticipated interactive effects with the other actions before it. This conclusion is dependent on the Council maintaining its current alternatives. If the Council were to revise the alternatives in the trawl LLP action in certain ways, it may be advisable to combine the trawl LLP action with the Gulf LLP action. First, if the Council elects to use the trawl LLP action to restructure any aspects of the LLP, combining the trawl LLP action with Gulf LLP action (which could take a broader view of the LLP) may be a more comprehensive, workable approach for coordinating the Council's decision making process.<sup>1</sup> If the Council maintains the current, relatively minimal participation thresholds for assessing latency in the trawl LLP action and does not use that action to restructure the LLP, the current action is unlikely to have substantial interactive effects with the other actions under consideration.

The AI LLP action (which is currently joined with the trawl LLP action) contains options that would qualify trawl licenses with history in the parallel fishery or the State water fishery in the Aleutians for an Aleutian Islands LLP endorsement. This action could qualify several trawl licenses for participation in the Aleutians. The Council is simultaneously considering the BS/AI Pacific cod allocation action, to divide the Bering Sea/Aleutian Islands Pacific cod allocations between those two subareas. That action is joined with the BSAI Pacific cod LLP action, which would qualify all holders of a Bering Sea or Aleutian Islands endorsed license for Pacific cod in the Bering Sea and Aleutian Islands. The qualification of licenses to participate in the Aleutians in the BSAI Pacific cod LLP action is likely far greater than the qualification in the AI LLP action. The BSAI Pacific cod LLP action, however, will be considered in the context of the action to divide Pacific cod between the Bering Sea and Aleutians, which is likely a prime motivation for increasing the number of licenses qualified for the Aleutians under both actions. The independent consideration of two sets of options to increase license endorsements for the Aleutians will likely complicate any analysis and reduce transparency of the actions to both Council decision makers and the public. Since the BS/AI Pacific cod allocation action is closely related to the issue of license qualifications for the Aleutians, it may be advisable to combine the AI LLP action with the BSAI Pacific cod LLP action and BS/AI Pacific cod allocation action to allow consideration of all options affecting Aleutian Islands allocations and eligibility in a single action and analysis.

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<sup>1</sup> For example, under the current LLP, a license contains a gear designation (i.e., trawl/non-trawl) that applies in all areas for which the license is endorsed. If the trawl action is used to revise the LLP, so that gear designations differ across areas, the Council may wish to combine the action with the Gulf action that could also consider options for revision of LLP endorsements.

## GROUND FISH LICENSE LIMITATION ANALYSIS for BSAI and GOA TRAWL CVs and CPs

### PRELIMINARY RESULTS

#### 1.0 INTRODUCTION

This paper presents information to assist the Council in formulating decisions on the respective options that have been developed to address LLP latent effort in the Bering Sea and Aleutian Islands (BSAI) and Gulf of Alaska (GOA) trawl CV and trawl CP groundfish fisheries. There are seven sections in the analysis presented, divided into the following headings:

**Purpose and Need**

**Overview of the Alternatives, Components and Options**

**Harvest/LLP Data Concern**

**Application of the Threshold Harvest Criteria**

**Impacts of the Alternatives**

**Economic Effects of the Proposed Alternatives**

**Management Issues for the Aleutian Islands Groundfish Fisheries**

#### 2.0 PURPOSE AND NEED

The proposed amendment applies threshold landings criteria to trawl groundfish fisheries in the Bering Sea, Aleutian Islands, the western Gulf of Alaska and central Gulf of Alaska. The intent of the amendment is to prevent latent trawl groundfish fishing capacity, comprised of LLPs from the respective areas that have not been utilized in recent years, from future re-entry into the fishery.

In December 2005, in preparation for consideration of provisions under this proposed amendment, the Council set a control date of December 11, 2005 for participation in the BSAI Pacific trawl CV fishery. The control date was notice to the public that participation in trawl groundfish fisheries by recently unutilized LLPs after this date may not be considered for future allocation or eligibility. Since this initial action, the focus of the amendment has expanded to include all groundfish species, options were added to consider application to CP LLPs and the area of implementation was expanded to include groundfish trawl CV and CP fisheries in the GOA. The moratorium as initially established by the Council does not correspond to the current formulation of the amendment.

The groups likely to be affected by the proposed amendment include trawl CV and trawl CP groundfish LLP permit holders in the abovementioned areas, as well as those holders of LLP permits, that would have groundfish area endorsements extinguished under provisions of the amendment. Under options being considered in the amendment, the Council may choose to expand application of the threshold criteria to both CV and CP trawl groundfish LLPs in the BSAI and GOA. The alternatives in the action apply the harvest thresholds to trawl groundfish LLPs at the management district level (BSAI & GOA) or at the submanagement district level (AI, BS, WG and CG). Note that under LLP area designations, the CG submanagement area includes west Yakutat.

The rationale for this action is concern over the impacts possible future entry of latent effort would have on the LLP holders that have exhibited participation and dependence on the groundfish fisheries. Latent effort, as addressed by this amendment, is comprised of valid LLPs that have not been utilized in the trawl CV groundfish fishery and the trawl CP groundfish in the BSAI & GOA in recent years. Recency, as defined in the alternatives, has been determined by the Council to be either: (a) participation during the 11 year period from

1995-2005 or (b) participation during the 6 year period from 2000-2005. The Council also specified that the analysis include 2006 non-AFA trawl groundfish harvests for the Aleutians Islands submanagement area (see Component 5 in the descriptions of alternatives below). In their discussions on this issue, the Council noted that LLP holders currently fishing the BSAI and GOA groundfish trawl fisheries have made significant investments, had long catch histories and are dependent on the groundfish resources from these areas. The Council believes these current participants need protection from LLPs that could re-enter the fisheries in the future.

As noted above, the management areas included under this program are the Bering Sea/Aleutian Islands (BSAI) and Gulf of Alaska (GOA). The management subareas included are the Bering Sea (BS), the Aleutian Islands (AI), the western Gulf of Alaska (WG), and the Central Gulf of Alaska (CG). The species included in the amendment include all species of trawl groundfish harvested in the above areas. Invertebrates (squid and octopus) crab, prohibited species (salmon, herring, halibut and steelhead), other species (sculpins, skates and sharks) and forage fish are not included and should not be affected by this amendment.

The Council's adopted the following draft problem statement on June 11, 2006.

*Trawl catcher vessel eligibility is a conflicting problem among the Bering Sea, Gulf of Alaska and Aleutian Islands. In the Bering Sea and Gulf of Alaska, there are too many latent licenses and in the Aleutian Islands there are not enough licenses available for trawl catcher vessels.*

*In the Bering Sea and GOA, the trawl catcher vessel groundfish fisheries in the BSAI and trawl vessel groundfish fisheries in the GOA are fully utilized. In addition, the existence of latent licenses may exacerbate the disadvantages to GOA dependant CVs resulting from a lack of comprehensive rationalization in the GOA. Competition for these resources is likely to increase as a result of a number of factors, including Council actions to rationalize other fisheries, favorable current market prices and a potential for TAC changes in future years. Trawl vessel owners who have made significant investments, have long catch histories, and are dependent upon BSAI and GOA groundfish resources need protection from others who have little or no recent history and with the ability to increase their participation in the fisheries. This requires prompt action to promote stability in the trawl catcher vessel sector in the BSAI and trawl vessel sector in the GOA until comprehensive rationalization is completed.*

*In the Aleutian Islands, previous Congressional and Council actions reflect a policy encouraging economic development of Adak. The opportunity for non-AFA CVs to build catch history in the AI was limited until markets developed in Adak. The analysis indicates that there are only six non-AFA CV trawl AI endorsed LLPs. The Congressional action to allocate AI pollock to the Aleut Corporation for the purpose of economic development of Adak requires that 50% of the AI pollock eventually be harvested by <60' vessels. The Council action under Am. 80 to allocate a portion of AI POP and Atka mackerel to the limited access fleet does not modify AFA CV sideboard restrictions, thus participation is effectively limited to non-AFA vessels with AI CV trawl LLP endorsements. A mechanism is needed to help facilitate the development of a resident fishing fleet that can fish in both state and federal waters. The Council will consider different criteria for the CV Eligibility in the AI.*

It is important to note that the main focus of the amendment is to reduce the future potential for increases in trawl groundfish fishing effort from LLPs currently unused or underutilized in all areas. However the last paragraph on the problem statement addresses the need to increase the number of valid non-AFA trawl LLPs in the Aleutian Islands area, and is therefore different in its objective from other management areas included in the amendment.

In addition to the main portion of the amendment that addresses numbers of LLPs meeting the harvest threshold over different qualification periods (Component 1, Options 1 & 2 with suboptions), it address a number of other aspects of LLPs in the BSAI and GOA groundfish fisheries, including: an alternative to exempt LLPs assigned to vessels less than 60 feet in length (Component 1-Option 3); an alternative to apply the threshold criteria to the group of LLPs assigned to trawl CPs in the BSAI that are neither part of the AFA sector nor qualified under Amendment 80 (Component 1 – Option 4); a provision to deal with multiple (stacked) LLPs assigned to a single

vessel (Component 2); an option to exclude AFA LLPs (Component 3); an option to exclude LLPs assigned to vessels qualified under Amendment 80 (Component 4); and an option for vessels with a catch history in the parallel waters or 2006 State waters Aleutian Island Pacific cod fishery that would be eligible, under the threshold criteria, to obtain an AI LLP on the basis of their past landings history for groundfish (Component 5).

### 3.0 OVERVIEW OF THE ALTERNATIVES, COMPONENTS AND OPTIONS

**Alternative 1 – No Action:** Under this alternative the existing situation will continue. All LLPs currently issued will continue to be valid for the BSAI and GOA trawl groundfish fisheries. There would also be no change in the number of non-AFA trawl CV LLPs for the Aleutian Islands area, which could occur under Component 5.

**Alternatives 2, 3, 4, and 5** are differentiated by two main factors: whether or not the program is implemented at the management area or subarea designation, and secondly whether the landings history is based upon trawl groundfish landings or total groundfish landings, including the amount harvested by fixed gear, which is included in the cumulative catch for the appropriate qualification period. The specification of these two main factors is shown for each respective alternative below:

*Alternative 2 would implement LLP threshold criteria based upon BSAI and GOA management areas. It would specify application of all trawl groundfish harvests within these areas for the respective qualification period.*

*Alternative 3 would implement LLP threshold criteria based upon BSAI and GOA management areas. It would specify application of groundfish harvests (trawl and fixed gear) within these areas for the respective qualification period.*

*Alternative 4 would implement LLP threshold criteria based upon BS, AI, WG and CG subdistrict management areas. It would specify application of trawl groundfish harvests within these areas for the respective qualification period.*

*Alternative 5 would implement LLP threshold criteria based upon BS, AI, WG and CG subdistrict management areas. It would specify application of groundfish harvests (trawl and fixed gear) within these areas for the respective qualification period.*

#### **Component/Option Choices Common to Each Action Alternative (2-5).**

Each of the four action alternatives has a common set of five components that will form the remainder of choices for this amendment. The Council can choose to include and apply any combination from these components to any one of the alternatives identified above. The respective components address the issues of qualification period; landing criterion applied to determine qualified LLPs; multiple LLPs registered to a single vessel; potential exclusion of AFA qualified vessels; potential exclusion of Amendment 80 vessels; and options for separately addressing LLPs in the Aleutian Islands groundfish fishery.

**Component 1** includes a number of possible choices for landings criteria to be applied to the current LLP holders for existing trawl LLPs in the respective areas. The varying factors under Component 1 are the choice of qualification period (2000-2005 or 1995-2005); choice of threshold criteria to be applied (at least one landing for the qualification period or at least two landings for the qualification period); and a final choice to exempt vessels with an overall length less than 60 feet from application of the threshold criteria. The choices for Component 1 are as follows:

*Component 1 – Option 1 requires at least one landing of groundfish during the qualification period of 2000-2005.*

*Component 1 – Option 1 - Suboption 1 requires at least one landing of groundfish during the qualification period of 1995-2005.*

*Component 1 – Option 2 requires at least two landings of groundfish during the qualification period of 2000-2005.*

*Component 1 – Option 2 – Suboption 1 requires at least two landings of groundfish during the qualification period of 1995-2005.*

*Component 1 – Option 3 provides a choice to exempt trawl LLPs in the BSAI or GOA assigned to vessels less than 60 feet in overall length from application of the threshold criteria. Selection of this option can be independent of other Component 1 options.*

*Component 1 – Option 4 provides a choice of whether to include non-AFA & non-Amendment 80 BSAI CPs in application of the groundfish threshold landings criteria.*

**Component 2** provides a choice where there are multiple LLPs registered to a single vessel, also known as ‘stacking’ of LLPs. The Council has specified a provision to deal with this situation as follows:

*Component 2 – will fully credit groundfish harvest history to all stacked licenses, each carrying its own qualifying endorsements and designations.*

**Component 3** provides a choice of whether to exclude AFA vessels from LLP qualification under the amendment. The Council identified a single option as follows:

*Component 3 – Option 1 will exclude LLPs originally issued to vessels qualified under the AFA and LLPs used for eligibility in the AFA.*

**Component 4** addresses consideration of excluding Amendment 80-qualified vessels from LLP qualification under the amendment. The Council identified a single option as follows:

*Component 4 – Option 1 will exclude LLPs originally issued to vessels Qualified under Amendment 80 and LLPs used for eligibility in Amendment 80.*

**Component 5** is different from other parts of the proposed amendment. It evaluates the effect of adding new LLPs to the Aleutian Islands non-AFA trawl groundfish CV fishery based on harvests during the respective qualification periods. Harvests for the parallel waters fishery in the Aleutian Islands and also the 2006 State waters fishery are included in the basis for qualification. The options for Component 5 are slightly different from Component 1 to provide inclusion of 2006 groundfish harvests.

Component 5 - Option 1: requires at least one landing of groundfish during the qualification period of 2000-2006.

Component 5 – Option 1 - Suboption 1: requires at least one landing of groundfish during the qualification period of 2000-2005.

Component 5 - Option 2: requires at least one landing of groundfish during the qualification period of 1995-2006.

Component 5 – Option 2 - Suboption 1: requires at least one landing of groundfish during the qualification period of 1995-2005.

Component 5 - Option 3: requires at least two landings of groundfish during the qualification period of 2000-2006.

Component 5 – Option 3 – Suboption 1: requires at least two landings of groundfish during the qualification period of 2000-2005.



Component 5 - Option 4: requires at least two landings of groundfish during the qualification period of 2000-2006.

Component 5 - Option 4 - Suboption 1: requires at least two landings of groundfish during the qualification period of 2000-2005.

#### **4.0 HARVEST/LLP DATA CONCERN**

Council staff recently became aware of a data problem for years prior to 2000 in the NOAA Fisheries, RAM Division database. This problem is related to the manner in which data prior to 2000 were recorded and stored. To apply the threshold landings criteria, it is necessary to tie the harvests of groundfish during the harvest period with a specific LLP or moratorium permit. The LLP program was implemented in 2000, however amendment options include an earlier 11 year qualification period from 1995-2005. Staff with RAM division advised the Council that the data formulation in the earlier years (prior to 2000) can not be accessed in electronic form to credit landings to a transferred moratorium permit. Should the Council choose the 1995-2005 qualification period, it would take a very laborious process to hand-process assignment of harvest to the correct LLP or moratorium permit, likely resulting in a long delay in implementation of the alternative.

There are also problems with the data that tie LLP ownership to harvest for the years 2000 and 2001. If the Council selects that latter qualification period for implementation of this alternative, it will mean that NOAA Fisheries will make a rebuttable presumption that the harvests associated with LLPs during 2000 and 2001 accrue to the vessel originating the LLP. Instances where this is not the case will have to be dealt with on a case by case basis.

It will be clear from reviewing the results presented in the following pages that the greater number of LLPs will be excluded using the later period of 2000-2005 compared with the 11-year period from 1995-2005. In many fleets and areas, the difference in the additional number of LLPs excluded by using the more recent period compared with 1995-2005 is relatively modest. However, there is a very large effect in the selection between these two choices when looking at the AFA groundfish trawl CVs most fleets and areas.

The largest differential between the choice of the two qualification periods is in the AFA trawl CV sector. Because of the implementation of the AFA, the participation for this group is markedly different in the latter period (2000-2005) compared with the longer period (1995-2005).

#### **5.0 APPLICATION OF THE THRESHOLD HARVEST CRITERIA**

The following discussion of results of the analysis is arranged in numeric order of the proposed alternatives, components and options.

##### **5.1 Component 1: Effects of Application of the Threshold Criteria**

The following tables have been revised version from those presented to the Council in December, 2006. They show the effect of applying the threshold criteria to the different trawl groundfish sectors and areas. Tables 1, 2 and 3 show the respective effects from **Alternatives 2 and 3**. Tables 4-9 show the respective effects from **Alternatives 4 and 5**.

The tables show the number of LLPs for different fleet sector areas that would meet the minimum threshold criteria (one landing or two landings) for each of the two qualifying periods (1995-2005 or 2000-2005). In effect, these tables identify the beneficiaries of the proposed action, since the qualifying LLPs will not have their area endorsements extinguished. When we shift to look at the effects of the different amendments and options, we look from the opposite perspective, focusing on those LLPs that do not meet the threshold criteria and thus will be excluded from future re-entry into the trawl groundfish fisheries. The opposite perspective, from the point of view of LLPs to be excluded, are presented in Tables 12-17.

Tables 13 and 14 present information to assess the affects of Component 5, which would increase the number of AI LLPs, based on past participation in the parallel waters groundfish fishery in the AI or the 2006 Adak State waters fishery off Adak.

The numbers in the body of the tables refer to the number of LLPs that would qualify for the specified threshold level (one landing or two landings) for the respective qualification periods. The numbers in parentheses show the numbers of LLPs that would not meet the threshold criteria, i.e. those LLPs that would lose areas endorsements under application of the specific alternative.

**Table 1: LLP License Holders with BSAI trawl CV endorsements that meet specific groundfish landing thresholds, 1995-2005 and 2000-2005**

	Alternative 2 - Trawl		Alternative 3 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
<b>Total number of BSAI trawl CV LLPs = 145</b>				
<b>Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =47)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	47	47	47	47
# achieving at least one landing BSAI groundfish	21 (26)	16 (31)	36 (11)	24 (23)
# achieving at least two landings BSAI groundfish	20 (27)	15 (32)	35 (12)	23 (24)
<b>AFA trawl CV LLPs (total number of LLPs = 98)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	98	98	98	98
# achieving at least one landing BSAI groundfish	98 (0)	94 (4)	98 (0)	94 (4)
# achieving at least two landings BSAI groundfish	98 (0)	94 (4)	98 (0)	94 (4)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained BSAI groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 2: LLP License Holders with GOA trawl CV endorsements that meet specific groundfish landing thresholds, 1995-2005 and 2000-2005**

	Alternative 2 - Trawl		Alternative 3 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
<b>Total number of GOA trawl CV LLPs = 208</b>				
<b>Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =117)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	117	117	117	117
# achieving at least one landing BSAI groundfish	96 (21)	80 (37)	107 (10)	97 (20)
# achieving at least two landings BSAI groundfish	95 (22)	79 (38)	105 (12)	95 (22)
<b>AFA trawl CV LLPs (total number of LLPs = 91)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	91	91	91	91
# achieving at least one landing BSAI groundfish	89 (2)	43 (48)	89 (2)	43 (48)
# achieving at least two landings BSAI groundfish	87 (4)	34 (57)	87 (4)	34 (57)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained GOA groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 3: LLP License Holders with GOA trawl CP endorsements that meet specific groundfish landing thresholds, 1995-2005 and 2000-2005**

	Alternative 2 -Trawl		Alternative 3 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
<b>Total number of GOA trawl CP LLPs = 36</b>	1995-2005	2000-2005	1995-2005	2000-2005
<b>Non-AFA trawl CP LLPs (total number of non-AFA LLPs = 4)</b>				
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	4	4	4	4
# achieving at least one landing BSAI groundfish	0 (4)	0 (4)	2 (2)	2 (2)
# achieving at least two landings BSAI groundfish	0 (4)	0 (4)	2 (2)	2 (2)
<b>AFA trawl CP LLPs (total number of AFA LLPs =8)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	8	8	8	8
# achieving at least one landing BSAI groundfish	5 (3)	2 (6)	5 (3)	2 (6)
# achieving at least two landings BSAI groundfish	5 (3)	1 (7)	5 (3)	1 (7)
<b>Amendment 80 trawl CP LLPs (total number of LLPs =24)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	24	24	24	24
# achieving at least one landing BSAI groundfish	23 (1)	21 (3)	23 (1)	21 (3)
# achieving at least two landings BSAI groundfish	22 (2)	20 (4)	22 (2)	20 (4)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained GOA groundfish harvests and include groundfish destined for meal production.

Note: harvests include both CP landings operating as a CP and, where applicable, landings of the CPs making landings as a CV.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 4: LLP License Holders with AI trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005**

	Alternative 4 - Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
<b>Total number of AI trawl CV LLPs = 48</b>	1995-2005	2000-2005	1995-2005	2000-2005
<b>Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =6)</b>				
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	6	6	6	6
# achieving at least one landing BSAI groundfish	1 (5)	1 (5)	4 (2)	1 (5)
# achieving at least two landings BSAI groundfish	1 (5)	1 (5)	4 (2)	1 (5)
<b>AFA trawl CV LLPs (total number of LLPs =42)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	42	42	42	42
# achieving at least one landing BSAI groundfish	39 (3)	24 (18)	39 (3)	24 (18)
# achieving at least two landings BSAI groundfish	35 (7)	21 (21)	35 (7)	21 (21)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained AI groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 5: LLP License Holders with BS trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005**

	Alternative 4 - Trawl		Alternative 5 - Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of BS trawl CV LLPs = 143	1995-2005	2000-2005	1995-2005	2000-2005
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =45)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	45	45	45	45
# achieving at least one landing BSAI groundfish	20 (25)	15 (30)	34 (11)	23 (22)
# achieving at least two landings BSAI groundfish	19 (26)	14 (31)	33 (12)	22 (23)
AFA trawl CV LLPs (total number of LLPs =98)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	98	98	98	98
# achieving at least one landing BSAI groundfish	98 (0)	94 (4)	98 (0)	94 (4)
# achieving at least two landings BSAI groundfish	98 (0)	94 (4)	98 (0)	94 (4)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained BS groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 6: LLP License Holders with WG trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005**

	Alternative 4 -Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Total number of WG trawl CV LLPs = 150	1995-2005	2000-2005	1995-2005	2000-2005
Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =72)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	72	72	72	72
# achieving at least one landing BSAI groundfish	54 (18)	47 (25)	62 (10)	57 (15)
# achieving at least two landings BSAI groundfish	52 (20)	44 (28)	58 (14)	51 (21)
AFA trawl CV LLPs (total number of LLPs =78)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	78	78	78	78
# achieving at least one landing BSAI groundfish	70 (8)	23 (55)	70 (8)	23 (55)
# achieving at least two landings BSAI groundfish	68 (10)	13 (65)	68 (10)	13 (65)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained WG groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 7: LLP License Holders with CG trawl CV endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005**

	Alternative 4-Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
<b>Total number of CG trawl CV LLPs = 165</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
<b>Non-AFA trawl CV LLPs (total number of Non-AFA LLPs =105)</b>				
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	105	105	105	105
# achieving at least one landing BSAI groundfish	89 (16)	57 (48)	98 (7)	74 (31)
# achieving at least two landings BSAI groundfish	89 (16)	51 (54)	98 (7)	68 (37)
<b>AFA trawl CV LLPs (total number of AFA LLPs =60)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	60	60	60	60
# achieving at least one landing BSAI groundfish	51 (9)	29 (31)	51 (9)	29 (31)
# achieving at least two landings BSAI groundfish	50 (10)	27 (33)	50 (10)	27 (33)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained CG groundfish harvests and include groundfish destined for meal production.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 8: LLP License Holders with WG CP endorsements that meet specific harvest thresholds, 1995-2005 and 2000-2005**

	Alternative 4 -Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
<b>Total number of WG trawl CP LLPs = 28</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
<b>AFA trawl CP LLPs (total number of AFA LLPs =6)</b>				
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	6	6	6	6
# achieving at least one landing BSAI groundfish	3 (3)	2 (4)	3 (3)	2 (4)
# achieving at least two landings BSAI groundfish	3 (3)	1 (5)	3 (3)	1 (5)
<b>Amendment 80 trawl CP LLPs (total number of LLPs =22)</b>	<b>1995-2005</b>	<b>2000-2005</b>	<b>1995-2005</b>	<b>2000-2005</b>
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	22	22	22	22
# achieving at least one landing BSAI groundfish	20 (2)	19 (3)	20 (2)	19 (3)
# achieving at least two landings BSAI groundfish	20 (2)	19 (3)	20 (2)	19 (3)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained WG groundfish harvests and include groundfish destined for meal production.

Note: harvests include both CP landings operating as a CP and, where applicable, landings of the CPs making landings as a CV.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

**Table 9: LLP License Holders with CG CP endorsements that meet specific harvest thresholds, 1995-2005 and 2000-2005**

Total number of CG trawl CP LLPs = 25	Alternative 4 -Trawl		Alternative 5 -Trawl and Non-Trawl	
	Period/ Number of LLPs		Period/ Number of LLPs	
Non-AFA trawl CP LLPs (total number of Non-AFA LLPs = 4)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	4	4	4	4
# achieving at least one landing BSAI groundfish	0 (4)	0 (4)	2 (2)	2 (2)
# achieving at least two landings BSAI groundfish	0 (4)	0 (4)	2 (2)	2 (2)
AFA trawl CP LLPs (total number of AFA LLPs =4)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	4	4	4	4
# achieving at least one landing BSAI groundfish	4 (0)	1 (3)	4 (0)	1 (3)
# achieving at least two landings BSAI groundfish	4 (0)	0 (4)	4 (0)	0 (4)
Amendment 80 trawl CP LLPs (total number of LLPs =17)	1995-2005	2000-2005	1995-2005	2000-2005
# achieving a zero harvest threshold for BSAI groundfish harvest –status quo	17	17	17	17
# achieving at least one landing BSAI groundfish	17 (0)	15 (2)	17 (0)	15 (2)
# achieving at least two landings BSAI groundfish	16 (1)	12 (5)	16 (1)	12 (5)

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained CG groundfish harvests and include groundfish destined for meal production.

Note: harvests include both CP landings operating as a CP and, where applicable, landings of the CPs making landings as a CV.

The italicized numbers in parentheses show the respective numbers of permits that would not achieve the threshold level of one landing and two landings.

## 5.2 Component 1 Option 3 – Exemption for LLPs assigned to vessels less than 60 feet

Data presented in Tables 22-26 provide specific information on the numbers of LLPs assigned to vessels less than 60 feet. They also provide information on regional characteristics of LLPs, i.e. do vessels less than 60 feet that would be excluded tend to be comprised of more local (i.e. Alaska) LLPs than the sector as a whole.

## 5.3 Component 1 Option 4 - Potential Inclusion of LLPs assigned to non-AFA & non-Amendment 80 groundfish vessels in the BSAI

At the October, 2006 meeting, the Council added a new option to the LLP analysis. Prior to that time, the proposed amendment did not address the operation of CPs in the BSAI. The new option provides the choice of whether or not to include application of the harvest thresholds for LLPs to CPs operating in the BSAI that are non-AFA and will not be included with the Amendment 80 qualified vessels.

There are a total of five CP LLPs that meet these criteria for the BSAI. Of the five, four would not meet the harvest threshold of one or greater harvests during the qualification periods, based on trawl CP landings. Only one of the group would meet the threshold criteria of both one and two landings over both threshold periods. This would be the result under Alternative 2 assumption, to only include trawl landings.

Under the assumptions of Alternative 3, CP non-trawl landings would be included in the analysis of threshold qualification. Under this situation, each of the five non-AFA, non-Amendment 80 CP LLPs would meet the thresholds of both one and two landings over either of the qualification periods.

## **5.4 Component 2 - Multiple LLPs assigned to a single vessel**

More than one LLP can be assigned to a single fishing vessel. The Council initially specified three options for methods of dealing with multiple (or stacked) licenses assigned to a single vessel. In October 2006, the Council made a determination to simplify this issue and fully credit groundfish harvest history for all stacked licenses. The instances of stacked licenses were individually reviewed as part of the data analysis, and the resulting decisions have been incorporated into the data files used in this analysis.

## **5.5 Component 3 - Options for AFA vessels**

After reviewing the data presented in Tables 22-26, the Council could choose to include or exclude AFA vessels from the amendment. It is clear from the data that the later period, being post AFA, has a much higher number of LLPs that would be excluded than the full period which incorporates pre-AFA harvests. The AFA has been successful in reducing the numbers of vessels actually fishing through cooperatives, which is the reason for the change in participation in non-pollock groundfish harvests, particularly in the GOA.

## **5.6 Component 4 – Options for Amendment 80 vessels**

After reviewing the data presented in Tables 22-26, the Council could choose to include or exclude Amendment 80 LLPs from the amendment. The decision to include or exclude may be made on the basis of latent permits, but could also include other considerations, i.e. protections afforded by sideboards under Amendment 80. The current estimate of the number of vessels in this group is 26.

Amendment 80 is a vessel designated program. The owner of a vessel qualified under the program may select which LLP to assign the Amendment 80 quota to, in the cases where the owner has multiple LLPs. There may therefore be some shifts to the number of Amendment 80 LLPs achieving the threshold criteria, once that program becomes implemented.

In the GOA, fishing by this group (Amendment 80-qualified vessels) will be regulated by sideboards. They have sideboard limits on halibut bycatch, Pollock, Pacific cod and directed rockfish (POP, northern rockfish, pelagic slope rockfish). While the rockfish pilot program is in effect, the Amendment 80 vessels have a lower priority for rockfish than the participants in the pilot program.

In the BSAI, there are no sideboards for any species for the Amendment 80 vessels.

## **5.7 Component 5 – Options for New Non-AFA LLPs in the Aleutian Islands Groundfish Fishery**

Table 10 provides an evaluation of the effects of Component 5. It shows the harvest records for vessels not having an Aleutian Islands LLP endorsement, for both the parallel waters fishery and the 2006 groundfish fishery in State waters. Note that the data for the 2006 State waters fishery are only current through March 2006. It is possible that there could be additional vessels making landings of groundfish within the State waters fishery in 2006 that do not appear in this table.

The data files available do not allow differentiation between one landing and two landings at this time. Therefore, the response to the threshold achievement for at least two groundfish harvests is marked n/a. It is likely that the vessels achieving greater than one landing would also achieve two landings. This problem will be resolved for the next version of this analysis.

The vessel length characteristics for trawl vessels making groundfish landings under Component 5 have been an issue of concern for the Council. Table 11 provides additional detail on the vessel length characteristics for vessels making landings in the parallel waters fishery and/or the 2006 State waters fishery. Note that three of

the vessels making landings in the State waters fishery in 2006 also had landings in the parallel waters fishery. Therefore, the number of vessels achieving the harvest threshold for the State waters fishery is four, if we do not count the vessels already counted in the parallel waters total. The sum total of vessels for both areas that would achieve the threshold level of at least one landing is **21 vessels** (17 plus 7 less the four 'overlap' vessels). This number of vessels would receive AI LLPs if Component 5 is selected by the Council.

**Table 10: Vessels without AI trawl CV LLP endorsements that meet specific groundfish harvest thresholds, 1995-2005 and 2000-2005 Parallel Waters and State waters Fisheries**

Qualification period	1995-2005	2000-2005	2006
	# of vessels	# of or vessels	# of vessels
<b>Non-AFA trawl CV without an AI LLP</b>	<b>Parallel waters fishery</b>	<b>Parallel waters fishery</b>	<b>2006 State waters fishery</b>
# achieving at least one landing AI groundfish	17	17	7 <sup>(1)</sup>
# achieving at least two landings AI groundfish	n/a	n/a	7 <sup>(1)</sup>

Source: Harvest data are from NPFMC data files comprised of 1995 – 2005 fish tickets merged to an LLP file. Harvest data are retained AI groundfish harvests and include groundfish destined for meal production.

(1) Note that three of the seven vessels participating in the 2006 State waters fishery also appear in the parallel waters totals.

**Table 11: Vessel Length for AI Parallel Waters and State Waters Fishery in 2006**

	Parallel waters	State waters fishery
vessel #	length in feet	length in feet
1	58	58
2	90	
3	58	58
4	58	
5	58	
6	57	
7	58	58
8	58	
9	58	
10	58	
11	58	
12	58	
13	112	
14	119	
15	58	
16	58	
17	58	
18		114
19		104
20		103
21		90
<b>Total # of vessels</b>	<b>17</b>	<b>7</b>
<b>number &lt; 60 feet</b>	<b>14</b>	<b>3 *</b>
* note that these three vessels are also included in the total of 14 vessels < 60 feet for the parallel waters fishery		

Source: NPMFC AI Trawl Latency Database I, December 2006.



## 6.0 IMPACTS OF THE ALTERNATIVES

This section of the report presents data on the impacts, presenting the number of LLPs that would not meet the respective thresholds for the alternatives considered for this amendment. Depending upon the areas selected, area endorsements for non-qualifying LLPs would be extinguished. This amendment would apply the threshold criterion of either one landing or two landings for one of the qualification periods. The number of LLPs that would not meet the threshold qualification level are shown in the series of tables below, under the heading appropriate to the specific alternative or component.

We don't know, with any degree of certainty, the actual effect we would be circumventing possible future entry of latent LLPs through selection of any specific alternative. Therefore the analysis of impacts is somewhat constrained. However, we can rank alternatives and options with regard to several important factors, specifically:

- the number of latent LLPs that would have area endorsements removed (more is presumed to be better than less, due to the relatively larger potential effect on LLPs meeting the threshold criterion)
- the relative proportion of LLPs assigned to vessels less than 60 feet in length, compared with the current status quo (it is presumed to be better not to disproportionately remove LLPs assigned to vessels less than 60 feet to preserve diversification in the fisheries), and
- the relative proportion of LLPs assigned to owners inside Alaska compared with those from outside of Alaska (as represented by the mailing address on the LLP permits). It is presumed to be desirable not to disproportionately remove area endorsements from LLPs assigned in a manner that would reduce participation in the groundfish fisheries by residents of Alaska's marine communities.

### 6.1 Status quo (No Action Alternative)

Under the no-action alternative, there would be no reduction in the number of valid LLPs in any of the trawl CV or trawl CP fisheries in the BSAI and GOA. Should future re-entry of latent LLPs into the trawl groundfish fisheries over the qualification periods result in either reduced gross trawl groundfish revenues or increased operating costs for LLPs who have participated in recent years, there could be future negative economic impacts to the current trawl CP and CV LLP participants in the BSAI and GOA under the no-action alternative.

Additionally, the level of possible future entry is unknown and would depend on a number of factors including future changes in fisheries management regulations, fluctuations in resource abundance, changes in market conditions and prices and changes in operating costs for vessels assigned to LLPs.

### 6.2 Alternative 2 – BSAI/GOA Trawl Harvests of Groundfish

Table 12 shows how the specifications for this amendment would apply the threshold criterion of either one landing or two landings for one of the qualification periods. The number of LLPs that would not meet the threshold qualification levels are shown in the table for each area and fleet designation.

Table 12: BSAI & GOA Trawl CVs and CPs: Effects Under Alternative 2

Effects of Application of Threshold Criteria for CV and CP LLPs in the BSAI & GOA under Alternative 2												
Area	Fleet	period	total LLPs	(no action) # of LLPs not meeting harvest threshold of 0	# of LLPs for vessels less than 60 ft.	# of LLPs inside/outside AK	# of LLPs excluded at threshold of at least 1 harvest	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK	# of LLPs excluded at threshold of at least 2 harvests	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK
<b>BSAI &amp; GOA CVs</b>												
<b>Alternative 2 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
BSAI	non-AFA	00-05	47	0	13	20/27	31	11	16/15	32	11	17/15
GOA	non-AFA	00-05	117	0	64	60/57	37	22	20/17	38	22	20/18
<b>Alternative 2 - Component 1 Option 1- Suboption 1 (at least one trawl landing 1995-05) and Option 2 - Suboption 1 (at least two trawl landings 1995-2005)</b>												
BSAI	non-AFA	95-05	47	0	13	20/27	26	9	14/12	27	10	15/12
GOA	non-AFA	95-05	117	0	64	60/57	21	10	9/12	22	10	9/13
<b>Alternative 2 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
BSAI	AFA	00-05	98	0	0	5/93	4	0	0/4	4	0	0/4
GOA	AFA	00-05	91	0	0	5/86	48	0	0/48	57	0	0/57
<b>Alternative 2 - Component 1 Option 1 - Suboption 1 (at least one trawl landing 1995-05) and Option 2 Suboption 1 (at least two trawl landings 1995-2005)</b>												
BSAI	AFA	95-05	98	0	0	5/93	none	none	none	none	none	none
GOA	AFA	95-05	91	0	0	5/86	2	0	0/2	4	0	0/4
<b>GOA CPs</b>												
<b>Alternative 2 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
GOA	non-AFA	00-05	4	0	0	1/3	4	0	1/3	4	0	1/3
GOA	AFA	00-05	8	0	0	0/8	6	0	0/6	7	0	0/7
GOA	Am. 80	00-05	24	0	0	0/24	3	0	0/3	4	0	0/4
<b>Alternative 2 - Component 1 Option 1 - Suboption 1 (at least one trawl landing 1995-05) and Option 2 Suboption 1 (at least two trawl landings 1995-2005)</b>												
GOA	non-AFA	95-05	4	0	0	1/3	4	0	1/3	4	0	1/3
GOA	AFA	95-05	8	0	0	0/8	3	0	0/3	3	0	0/3
GOA	Am. 80	95-05	24	0	0	0/24	1	0	0/1	2	0	0/2

Within Alternative 2:

BSAI non-AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under Alternative 2 – Option 2 (32 LLPs out of 47). These LLPs have a lower proportion of vessels under 60 feet than all non-AFA trawl CVs, and a higher proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

GOA non-AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under Alternative 2 – Option 2 (38 LLPs out of 117). These LLPs have a very similar proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a very similar proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

BSAI AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under either Alternative 2 – Option 1 or Option 2 (both 4 LLPs out of 98). No excluded LLPs are assigned to vessels less than 60 feet and none are from Alaska.

GOA AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under either Alternative 2 – Option 2 (57 LLPs out of 91). No excluded LLPs are assigned to vessels less than 60 feet and none are from Alaska.

GOA trawl CPs

- The small number of non-AFA trawl CPs would be excluded under all options of Amendment 2
- Most (7 out of 8) AFA trawl CPs would be excluded under Alternative 2 – Option 2.
- 4 out of 24 LLPs assigned to Amendment 80 vessels would be excluded under Alternative 2 – Option 2.

Alternative 2 compared with Alternative 3:

- In almost all instances, the number of excluded LLPs is greater under Amendment 2 compared with Amendment due to the inclusion of non-trawl harvests.

### **6.3 Alternative 3 - BSAI/GOA Trawl and non-Trawl Harvests of Groundfish**

Table 23 shows how the specifications for this amendment would apply the threshold criterion of either one landing or two landings for one of the qualification periods. The number of LLPs that would not meet the threshold qualification level are shown in the table below.

Table 13: BSAI & GOA Trawl CVs and CPs: Effects Under Alternative 3

Effects of Application of Threshold Criteria for CV LLPs in the BSAI & GOA under Alternative 3												
Area	Fleet	period	total LLPs	(no action) # of LLPs not meeting harvest threshold of 0	# of LLPs for vessels less than 60 ft.	# of LLPs inside/outside AK	# of LLPs excluded at threshold of at least 1 harvest	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK	# of LLPs excluded at threshold of at least 2 harvests	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK
<b>BSAI &amp; GOA CVs</b>												
<b>Alternative 3 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
BSAI	non-AFA	00-05	47	0	13	20/27	23	8	10/13	24	8	11/13
GOA	non-AFA	00-05	117	0	64	60/57	20	12	9/12	22	13	9/13
<b>Alternative 3 - Component 1 Option 1 - Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
BSAI	non-AFA	95-05	47	0	13	20/27	11	3	3/8	12	4	4/8
GOA	non-AFA	95-05	117	0	64	60/57	10	5	3/7	12	6	4/8
<b>Alternative 3 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
BSAI	AFA	00-05	98	0	0	5/93	4	0	0/4	4	0	0/4
GOA	AFA	00-05	91	0	0	5/86	48	0	0/48	57	0	0/57
<b>Alternative 3 - Component 1 Option 1 - Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
BSAI	AFA	95-05	98	0	0	5/93	none	none	none	none	none	none
GOA	AFA	95-05	91	0	0	5/86	2	0	0/2	4	0	0/4
<b>GOA CPs</b>												
<b>Alternative 3 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
GOA	non-AFA	00-05	4	0	0	1/3	2	0	0/2	2	0	0/2
GOA	AFA	00-05	8	0	0	0/8	6	0	0/6	7	0	0/7
GOA	Am. 80	00-05	24	0	0	0/24	3	0	0/3	4	0	0/4
<b>Alternative 3 - Component 1 Option 1 - Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
GOA	non-AFA	95-05	4	0	0	1/3	2	0	0/2	2	0	0/2
GOA	AFA	95-05	8	0	0	0/8	3	0	0/3	3	0	0/3
GOA	Am. 80	95-05	24	0	0	0/24	1	0	0/1	2	0	0/2

Within Alternative 3:

BSAI non-AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under Alternative 3 – Option 2 (24 LLPs out of 47). These LLPs have a slightly higher proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a slightly higher proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

GOA non-AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under Alternative 3 – Option 2 (22 LLPs out of 117). These LLPs have a slightly higher proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a slightly lower proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

BSAI AFA trawl CV LLPs

- The difference in numbers of LLPs excluded for AFA trawl CVs is the number of years included in the qualifying period. For both alternatives using the later period (2000-2005), the number of LLPs excluded is 4 (out of 98) whereas the number excluded using the longer period (1995-2005) is zero.

GOA AFA trawl CV LLPs

- The highest number of latent LLPs would be excluded under either Alternative 3 – Option 2 (57 LLPs out of 91). This compared with 4 LLPs excluded using the later period.

GOA trawl CV CPs

- The same number of non-AFA trawl CPs would be excluded under all Amendment 3 options.
- Most (7 out of 8) AFA trawl CPs would be excluded under Alternative 3 – Option 2.
- 4 out of 24 LLPs assigned to Amendment 80 vessels would be excluded under Alternative 3 – Option 2.

Alternative 3 compared with Alternative 4:

- In almost all instances, the number of excluded LLPs is greater under Amendment 3 compared with Amendment 4 due to the inclusion of non-trawl harvests.

## **6.4 Alternative 4 – BS, AI, WG and CG Trawl Harvests of Groundfish**

Table 23 shows how the specifications for this amendment would apply the threshold criterion of either one landing or two landings for one of the qualification periods. The number of LLPs that would not meet the threshold qualification level are shown in the table below.

Within Alternative 4

AI non-AFA trawl CV LLPs

- For non-AFA trawl LLPs, there is no difference between Option 2 and Option 2 suboption 1 (i.e. the effect is the same for 1995-2005 and 2000-2005).

BS non-AFA trawl CV LLPs

- In the BS, the highest number of latent LLPs would be excluded under Alternative 4 – Option 2 (31 LLPs out of 45). These LLPs have a slightly higher proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a slightly higher proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

WG non-AFA trawl CV LLPs

- For the WG, the highest number of latent LLPs would be excluded under Alternative 4 – Option 2 (28 LLPs out of 72). These LLPs have a lower proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a lower proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

#### CG non-AFA trawl CV LLPs

- In the CG, the highest number of latent LLPs would also be excluded under Alternative 4 – Option 2 (54 LLPs out of 105). These LLPs have a much higher proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a much higher proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

#### AI AFA trawl CV LLPs

- In the AI, the highest number of latent AFA LLPs would be excluded under Alternative 4 – Option 2 (21 LLPs out of 42). These LLPs have no vessels under 60 feet and no LLPs assigned to vessels from Alaska.

#### BS AFA trawl CV LLPs

- In the BS, there are a relatively modest number of LLPs that would be excluded under either of the options in Alternative 4. The highest number of latent AFA LLPs would be excluded under Alternative 4 – Option 2 (4 LLPs out of 98). These LLPs have no vessels under 60 feet and no LLPs assigned to vessels from Alaska.

#### WG AFA trawl CV LLPs

- In the WG, the highest number of latent AFA LLPs would be excluded under Alternative 4 – Option 2 (65 LLPs out of 78). These LLPs have no vessels under 60 feet and only four LLPs assigned to vessels from Alaska.

#### CG AFA trawl CV LLPs

- In the CG, the highest number of latent AFA LLPs would be excluded under Alternative 4 – Option 2 (33 LLPs out of 60). These LLPs have no vessels under 60 feet and no LLPs assigned to vessels from Alaska.

#### WG and CG trawl CP LLPs

- In the CG, there are four non-AFA CPs. Under any of the options, all four would be excluded.
- Five of six WG AFA trawl CPs would be excluded under Alternative 4, Option 2. There are no vessels under 60 feet for these LLPs and all are from outside Alaska. The CG would have a similar result, with four of four excluded under this option.
- Five of 17 Amendment 80 LLPs would be excluded under Alternative 4, Option 2. There are no vessels under 60 feet for these LLPs and all are from outside Alaska.

#### Alternative 4 compared with Alternative 5:

- In almost all instances, the number of excluded LLPs is greater under Amendment 4 compared with Amendment 5 due to the inclusion of non-trawl harvests.

Table 14: BS, AI, WG & CG Trawl CVs: Effects Under Alternative 4

Area	Fleet	period	total LLPs	(no action) # of LLPs not meeting harvest threshold of 0	# of LLPs for vessels less than 60 ft.	# of LLPs inside/outside AK	# of LLPs excluded at threshold of at least 1 harvest	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK	# of LLPs excluded at threshold of at least 2 harvests	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK
<b>Effects of Application of Threshold Criteria for CV LLPs in the Aleutian Islands, Bering Sea, Western Gulf and Central Gulf: by Alternative</b>												
<b>BS, AI, WG &amp; GG CVs</b>												
<b>Alternative 4 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
AI	non-AFA	00-05	6	0	0	1/5	5	0	1/4	5	0	1/4
BS	non-AFA	00-05	45	0	13	19/26	30	11	15/15	31	11	16/15
WG	non-AFA	00-05	72	0	44	39/33	25	10	12/13	28	10	12/16
CG	non-AFA	00-05	105	0	59	54/51	48	36	30/18	54	41	34/20
<b>Alternative 4 - Component 1 Suboption 1 (at least one trawl landing 1995-05) and Option 2 Suboption 1 (at least two trawl landings 1995-2005)</b>												
AI	non-AFA	95-05	6	0	0	1/5	5	0	1/4	5	0	1/4
BS	non-AFA	95-05	45	0	13	19/26	25	9	13/12	26	10	14/12
WG	non-AFA	95-05	72	0	44	39/33	18	7	9/9	20	7	9/11
CG	non-AFA	95-05	105	0	59	54/51	16	8	6/10	16	8	6/10
<b>Alternative 4 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
AI	AFA	00-05	42	0	0	0/42	18	0	0/18	21	0	0/21
BS	AFA	00-05	98	0	0	5/93	4	0	0/4	4	0	0/4
WG	AFA	00-05	78	0	0	4/74	55	0	2/53	65	0	4/61
CG	AFA	00-05	60	0	0	5/55	31	0	0/31	33	0	0/33
<b>Alternative 4 - Component 1 Suboption 1 (at least one trawl landing 1995-05) and Option 2 Suboption 1 (at least two trawl landings 1995-2005)</b>												
AI	AFA	95-05	42	0	0	0/42	3	0	0/3	7	0	0/7
BS	AFA	95-05	98	0	0	5/93	none	none	none	none	none	none
WG	AFA	95-05	78	0	0	4/74	8	0	0/8	10	0	0/10
CG	AFA	95-05	60	0	0	5/55	9	0	0/9	10	0	0/10

Table 15: WG & CG Trawl CPs: Effects Under Alternative 4

Effects of Application of Threshold Criteria for CP LLPs in the WG and CG under Alternative 4												
Area	Fleet	period	total LLPs	(no action) # of LLPs not meeting harvest threshold of 0	# of LLPs for vessels less than 60 ft.	# of LLPs inside/outside AK	# of LLPs excluded at threshold of at least 1 harvest	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK	# of LLPs excluded at threshold of at least 2 harvests	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK
<b>WG &amp; GG CPs</b>												
<b>Alternative 4 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
WG	AFA	00-05	6	0	0	0/6	4	0	0/4	5	0	0/5
WG	Am. 80	00-05	22	0	0	0/22	3	0	0/3	3	0	0/3
<b>Alternative 4 - Component 1 Option 1 - Suboption 1 (at least one trawl landing 1995-05) and Option 2 Suboption 1 (at least two trawl landings 1995-2005)</b>												
WG	AFA	95-05	6	0	0	0/6	3	0	0/3	3	0	0/3
WG	Am. 80	95-05	22	0	0	0/22	2	0	0/2	2	0	0/2
<b>Alternative 4 - Component 1 Option 1 (at least one trawl landing 2000-2005) and Option 2 (at least two trawl landings 2000-2005)</b>												
CG	non-AFA	00-05	4	0	0	1/3	4	0	1/3	4	0	1/3
CG	AFA	00-05	4	0	0	0/4	3	0	0/3	4	0	0/4
CG	Am. 80	00-05	17	0	0	0/17	2	0	0/2	5	0	0/5
<b>Alternative 4 - Component 1 Option 1 - Suboption 1 (at least one trawl landing 1995-05) and Option 2 Suboption 1 (at least two trawl landings 1995-2005)</b>												
CG	non-AFA	95-05	4	0	0	1/3	4	0	1/3	4	0	1/3
CG	AFA	95-05	4	0	0	0/4	0	0	none	0	0	none
CG	Am. 80	95-05	17	0	0	0/17	0	0	none	1	0	0/1



## 6.5 Alternative 5 – BS, AI, WG and CG Trawl and non-Trawl Harvests of Groundfish

### Within Alternative 5

#### AI non-AFA trawl CV LLPs

- For non-AFA trawl LLPs, there is no difference between Option 2 and Option 2 suboption 1 (i.e. the effect is the same for 1995-2005 and 2000-2005).

#### BS non-AFA trawl CV LLPs

- In the BS, the highest number of latent LLPs would be excluded under Alternative 5 – Option 2 (23 LLPs out of 45). These LLPs have a higher proportion of vessels under 60 feet than all non-AFA trawl CVs, but almost the same proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

#### WG non-AFA trawl CV LLPs

- For the WG, the highest number of latent LLPs would be excluded under Alternative 5 – Option 2 (21 LLPs out of 72). These LLPs have a much lower proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a lower proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

#### CG non-AFA trawl CV LLPs

- In the CG, the highest number of latent LLPs would be excluded under Alternative 5 – Option 2 (37 LLPs out of 105). These LLPs have a much higher proportion of vessels under 60 feet than all non-AFA trawl CVs, and also a much higher proportion of LLPs assigned to vessels from Alaska than all non-AFA trawl CVs.

#### AI AFA trawl CV LLPs

- In the AI, the highest number of latent AFA LLPs would be excluded under Alternative 5 – Option 2 (21 LLPs out of 42). These LLPs have no vessels under 60 feet and no LLPs assigned to vessels from Alaska.

#### BS AFA trawl CV LLPs

- In the BS, there are a relatively modest number of LLPs that would be excluded under either of the options in Alternative 5. The highest number of latent AFA LLPs would be excluded under Alternative 5 – Option 2 (4 LLPs out of 98). These LLPs have no vessels under 60 feet and no LLPs assigned to vessels from Alaska.

#### WG AFA trawl CV LLPs

- In the WG, the highest number of latent AFA LLPs would be excluded under Alternative 5 – Option 2 (65 LLPs out of 78). These LLPs have no vessels under 60 feet and only four LLPs assigned to vessels from Alaska.

#### CG AFA trawl CV LLPs

- In the CG, the highest number of latent AFA LLPs would be excluded under Alternative 5 – Option 2 (33 LLPs out of 60). These LLPs have no vessels under 60 feet and no LLPs are assigned to vessels from Alaska.

•

#### WG and CG trawl CP LLPs

- In the CG, there are four non-AFA CPs. Under any of the options, two would be excluded.
- Five of six WG AFA trawl CPs would be excluded under Alternative 5, Option 2 or under Alternative 5, Option 2, Suboption 1. There are no vessels under 60 feet for these LLPs and all are from outside Alaska. The CG would have a similar result, with four of four excluded under this option.
- Five of 17 Amendment 80 LLPs would be excluded under Alternative 5, Option 2. There are no vessels under 60 feet for these LLPs and all are from outside Alaska.

Table 16: BS, AI, WG & CG Trawl CVs: Effects Under Alternative 5

Area	Fleet	period	total LLPs	(no action) # of LLPs not meeting harvest threshold of 0	# of LLPs for vessels less than 60 ft.	# of LLPs inside/outside AK	# of LLPs excluded at threshold of at least 1 harvest	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK	# of LLPs excluded at threshold of at least 2 harvests	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK
<b>Effects of Application of Threshold Criteria for CV LLPs in the Aleutian Islands, Bering Sea, Western Gulf and Central Gulf: by Alternative</b>												
<b>BS, AI, WG &amp; GG CVs</b>												
<b>Alternative 5 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
AI	non-AFA	00-05	6	0	0	1/5	2	0	0/2	2	0	0/2
BS	non-AFA	00-05	45	0	13	19/26	22	8	9/13	23	8	10/13
WG	non-AFA	00-05	72	0	44	39/33	15	6	5/10	21	8	8/13
CG	non-AFA	00-05	105	0	59	54/51	31	26	20/11	37	31	24/13
<b>Alternative 5 - Component 1 Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
AI	non-AFA	95-05	6	0	0	1/5	2	0	0/2	2	0	0/2
BS	non-AFA	95-05	45	0	13	19/26	11	3	3/8	12	4	4/8
WG	non-AFA	95-05	72	0	44	39/33	10	4	4/6	14	6	6/8
CG	non-AFA	95-05	105	0	59	54/51	7	4	2/5	7	4	2/5
<b>Alternative 5 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
AI	AFA	00-05	42	0	0	0/42	18	0	0/18	21	0	0/21
BS	AFA	00-05	98	0	0	5/93	4	0	0/4	4	0	0/4
WG	AFA	00-05	78	0	0	4/74	55	0	2/53	65	0	4/61
CG	AFA	00-05	60	0	0	5/55	31	0	0/31	33	0	0/33
<b>Alternative 5 - Component 1 Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
AI	AFA	95-05	42	0	0	0/42	3	0	0/3	7	0	0/7
BS	AFA	95-05	98	0	0	5/93	none	none	none	none	none	none
WG	AFA	95-05	78	0	0	4/74	8	0	0/8	10	0	0/10
CG	AFA	95-05	60	0	0	5/55	9	0	0/9	10	0	0/10

Table 17: WG & CG Trawl CPs: Effects Under Alternative 5

Area	Fleet	period	total LLPs	(no action) # of LLPs not meeting harvest threshold of 0	# of LLPs for vessels less than 60 ft.	# of LLPs inside/outside AK	# of LLPs excluded at threshold of at least 1 harvest	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK	# of LLPs excluded at threshold of at least 2 harvests	# of excluded LLPs for vessels less than 60 ft.	# of excluded LLPs inside/outside AK
<b>Effects of Application of Threshold Criteria for CV LLPs in the Aleutian Islands, Bering Sea, Western Gulf and Central Gulf: by Alternative</b>												
<b>WG &amp; GG CPs</b>												
<b>Alternative 5 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
WG	AFA	00-05	6	0	0	0/6	4	0	0/4	5	0	0/5
WG	Am. 80	00-05	22	0	0	0/22	3	0	0/3	3	0	0/3
<b>Alternative 5 - Component 1 Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
WG	AFA	95-05	6	0	0	0/6	4	0	0/4	5	0	0/5
WG	Am. 80	95-05	22	0	0	0/22	2	0	0/2	2	0	0/2
<b>Alternative 5 - Component 1 Option 1 (at least one groundfish landing 2000-2005) and Option 2 (at least two groundfish landings 2000-2005)</b>												
CG	non-AFA	00-05	4	0	0	1/3	2	0	0/2	2	0	0/2
CG	AFA	00-05	4	0	0	0/4	3	0	0/3	4	0	0/4
CG	Am. 80	00-05	17	0	0	0/17	2	0	0/2	5	0	0/5
<b>Alternative 5 - Component 1 Suboption 1 (at least one groundfish landing 1995-05) and Option 2 Suboption 1 (at least two groundfish landings 1995-2005)</b>												
CG	non-AFA	95-05	4	0	0	1/3	2	0	0/2	2	0	0/2
CG	AFA	95-05	4	0	0	0/4	0	0	none	0	0	none
CG	Am. 80	00-05	17	0	0	0/17	0	0	none	1	0	0/1

## 7.0 ECONOMIC EFFECTS OF THE PROPOSED ACTION

### What the amendment will do....

- It will implement threshold criteria for trawl groundfish LLPs and extinguish area endorsements for those permits that have not been utilized for the respective periods (either 1995-2005 or 2000-2005). By taking this action, the Council would maintain the status quo (no action alternative) by fixing the maximum of LLPs allowed to participate in the CV trawl groundfish fisheries.
- It will mean that future gross revenues from groundfish harvests of active LLP holders in the respective areas **would not** be diluted by additional fishing effort by LLPs deemed as latent by this action. Those LLP holders exhibiting dependence and participation in the trawl groundfish fisheries, (i.e. those meeting the selected threshold criterion), would be protected from possible future increases in effort and 'dilution' of their gross revenue share.

### What the amendment will not do....

- The action will not result in production efficiencies for LLPs that achieve the threshold levels and continue in the groundfish fisheries. Following implementation of the amendment, each LLP holder will still have incentive to expand their effective fishing effort and thereby maximize their respective share of the gross revenues to be earned in the trawl groundfish fisheries.
- The amendment will not necessarily result in an 'optimum' capacity in any of the sectors or areas, however that term may be interpreted by different individuals. The Council selected two modest threshold levels for application of the exclusion criterion, one landing and two landings over six or 11 years. The number of latent LLPs to be excluded under any of these choices was not based on a predetermined 'optimum' capacity for the trawl groundfish fleet. The action should be regarded as a modest step to resolve long term participation issues in the trawl groundfish fishery.

## 7.1 Economic Aspects of the Proposed Action

This section presents a brief discussion of aspects of the economic effects that might be expected to occur as the result of eliminating area endorsements of LLPs that have not been utilized in recent years.

The impetus for this action originated with existing participants in the trawl groundfish fishery, concerned over possible future entry of 'latent' vessels that have not participated in the fishery in recent years. These 'latent' LLPs are valid, and holders are eligible to participate in the fishery as a result of being awarded an LLP when the program was initially implemented. The threshold criteria being considered in this amendment are similar to those in the initial LLP program, with the main difference being the consideration of recency in the qualification period considered to qualify an existing LLP (i.e. 1995-2005 or 2000-2005).

In looking at potential economic benefits from reduced capacity, we typically anticipate benefits from increased efficiency (with respect to productive capability and reduced costs for vessels assigned to the respective LLPs), improved safety, potential for reduction in non-targeted species bycatch or prohibited species bycatch or impacts.

In general terms, in working towards rationalization of a fishery, the Council goes through a number of interim steps, beginning with implementation of a moratorium, assigning limited entry licenses, and then in some cases moving to a fully rationalized management regime. For BSAI and GOA trawl groundfish, the first two steps, a moratorium on new entry and assignment of LLPs has been completed. The current action is basically an 'update' of the assignment of LLPs, with the intent to remove area endorsements for those LLPs that have not been utilized.

The latent LLPs addressed in this amendment are not participating now, nor have they participated in the recent past. The concern expressed by the Council and current participants in the trawl groundfish fisheries is that changes in exogenous factors (regulatory, market or resource) would encourage a change in participation patterns different from what has been the case in the recent past

We can't assign a probability to the likelihood of the latent effort entering the fishery. However, we can deal with the potential effects of this entry, should it occur in at least a qualitative manner. The following list details a number of factors to consider.

- There could be losses of efficiency from 'too much effort' in a fishery. In this case, 'too much effort' would reflect a level where trip lengths would be excessively short, processing capacity would be plugged (reducing quality of the fish landed) and the other usual symptoms of excessive effort in a short period of time.
- There could be effects on the historical participants, for example the average gross revenue for the 'historical' participants in the fishery could decrease. Since we don't have information on the cost and revenue characteristics of these vessels, we can't say with certainty what the net effect on revenues for historical participants would be, but we can assume that it would also decrease with increased participation levels.
- There could be impacts associated with consumer surplus or other market-related changes. However, changes in groundfish production as a result of this action, under any of the alternatives, are anticipated to be negligible. Therefore, we can anticipate the effects on consumer surplus are also likely to be negligible.
- There could be forgone opportunity costs for LLPs closed out of a fishery. Note that this foregone cost could be zero if the LLP area endorsements that are extinguished would have remained unused in the future in the absence of this amendment.
- There are regional impact issues on vessels and communities. These are not issues of net national benefit, but are still an important aspect of the analysis, and are specifically mentioned in the Magunson-Stevens Act as a factor to consider in proposed fishery regulations.

In summary, the main economic benefit to be obtained from this amendment is to prevent possible future negative effects from occurring, by preventing future entry of latent LLPs.

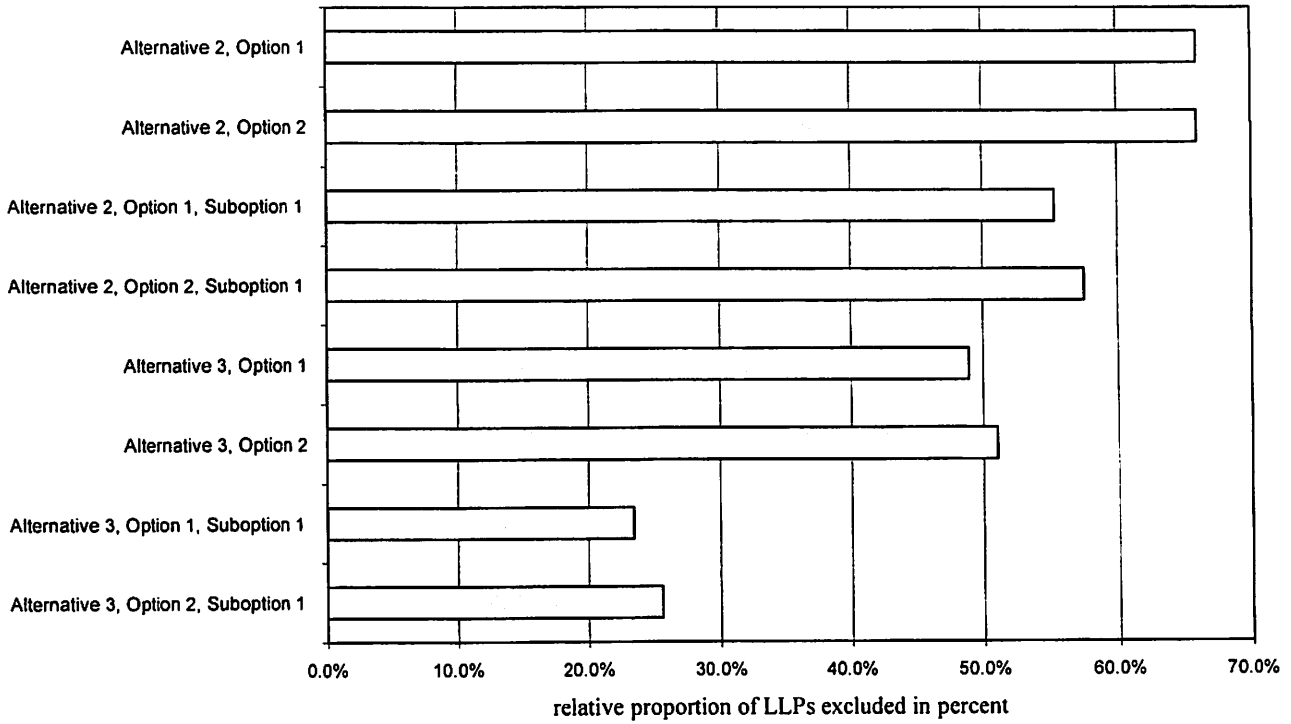
## 7.2 Graphical Presentation of LLPs Excluded under the Alternatives

Tables 12-17 provide data on the number of LLPs that would be excluded under each of the alternatives. The Council may make their selection of the most appropriate alternative based upon which best meets the set of factors that have been discussed in formulation of this alternative: **the number of latent LLPs to be excluded, the proportion of vessels less than 60 feet in the LLPs to be excluded and the relative proportion of inside Alaska/outside Alaska residency for the LLPs to be excluded.**

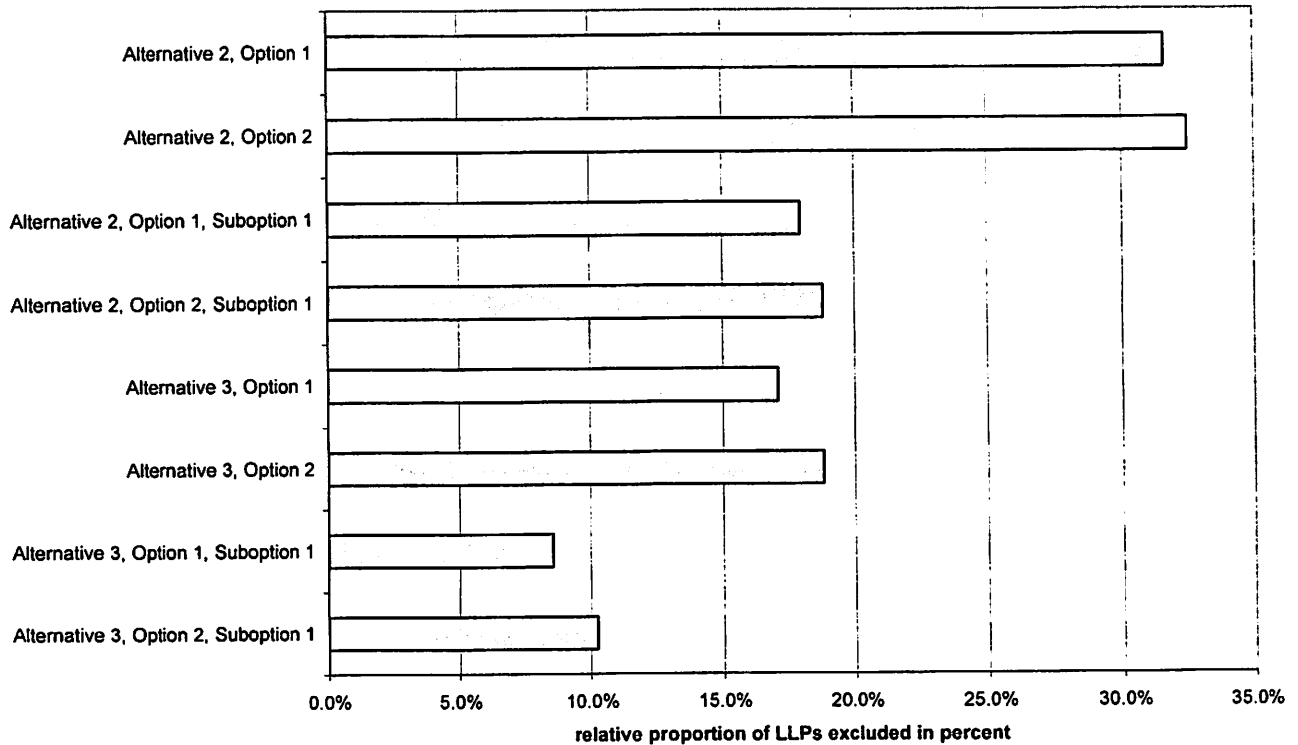
To assist the Council in working through their review of the alternatives, Figures 1-17 on the following pages show at a glance the respective number of LLPs that are excluded for each of the alternatives. Note that these figures show the relative proportion of LLPs excluded to allow a quick comparison across alternatives, not the absolute number of LLPs excluded which are shown in Tables 12-17. These graphs are intended as a decision tool to assist the Council in going through the range of alternatives and options for this proposed amendment and may not be included in the RIR/EA analysis. Due to the large number of alternatives, the figures focus on only two sectors: non-AFA trawl CVs and CPs and AFA trawl CVs and CPs.

If the Council finds this information useful, the presentation could be extended to also include the LLPs for the Amendment 80 vessels and for the factors of vessels <60 feet and/or the proportion inside/outside Alaska.

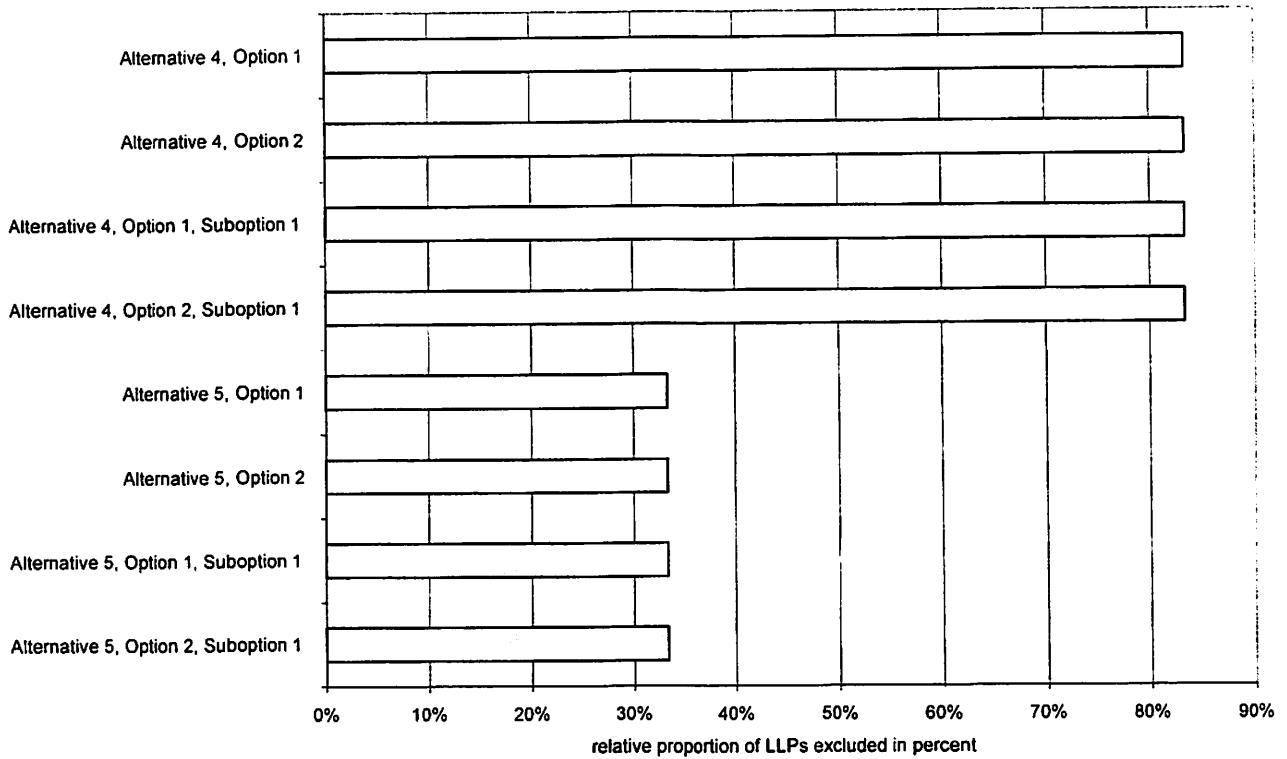
**Figure 1: Non-AFA Trawl CVs - Proportion of Total LLPs Excluded, by BSAI Alternatives 2 and 3**



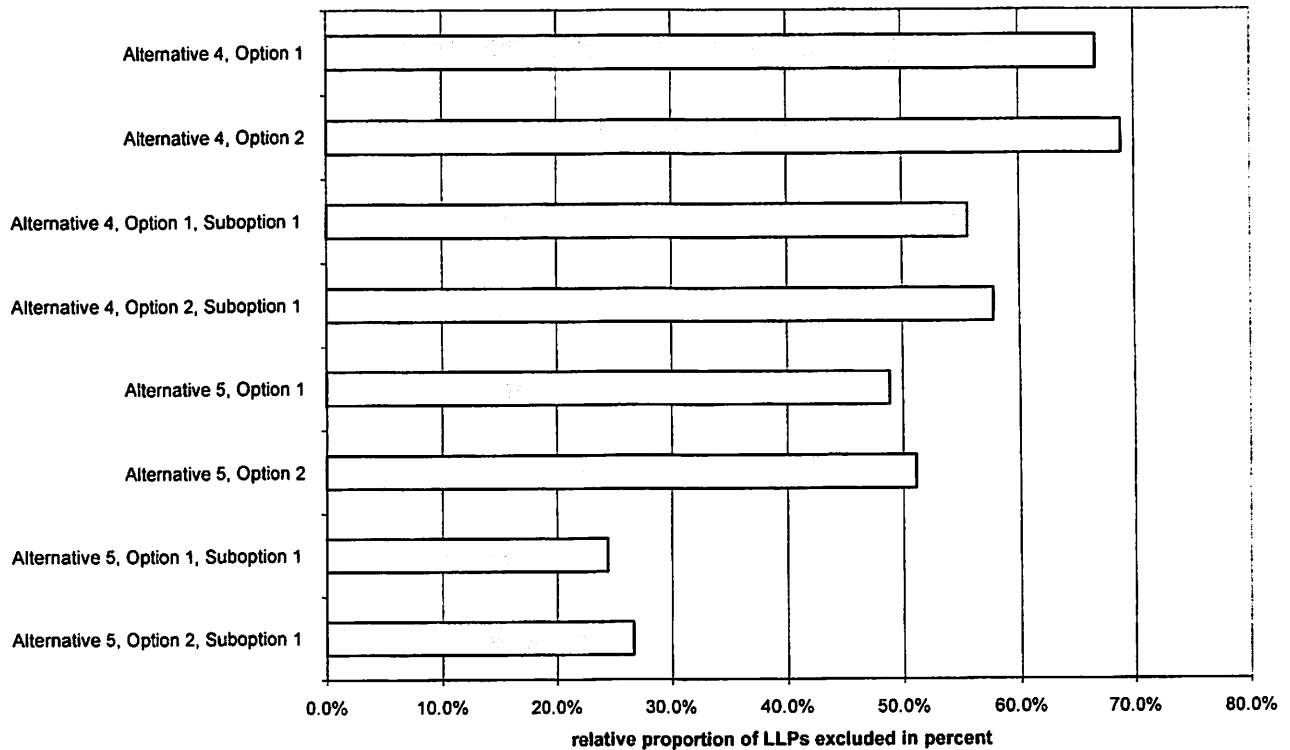
**Figure 2: Non-AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative GOA Alternatives 2 and 3**



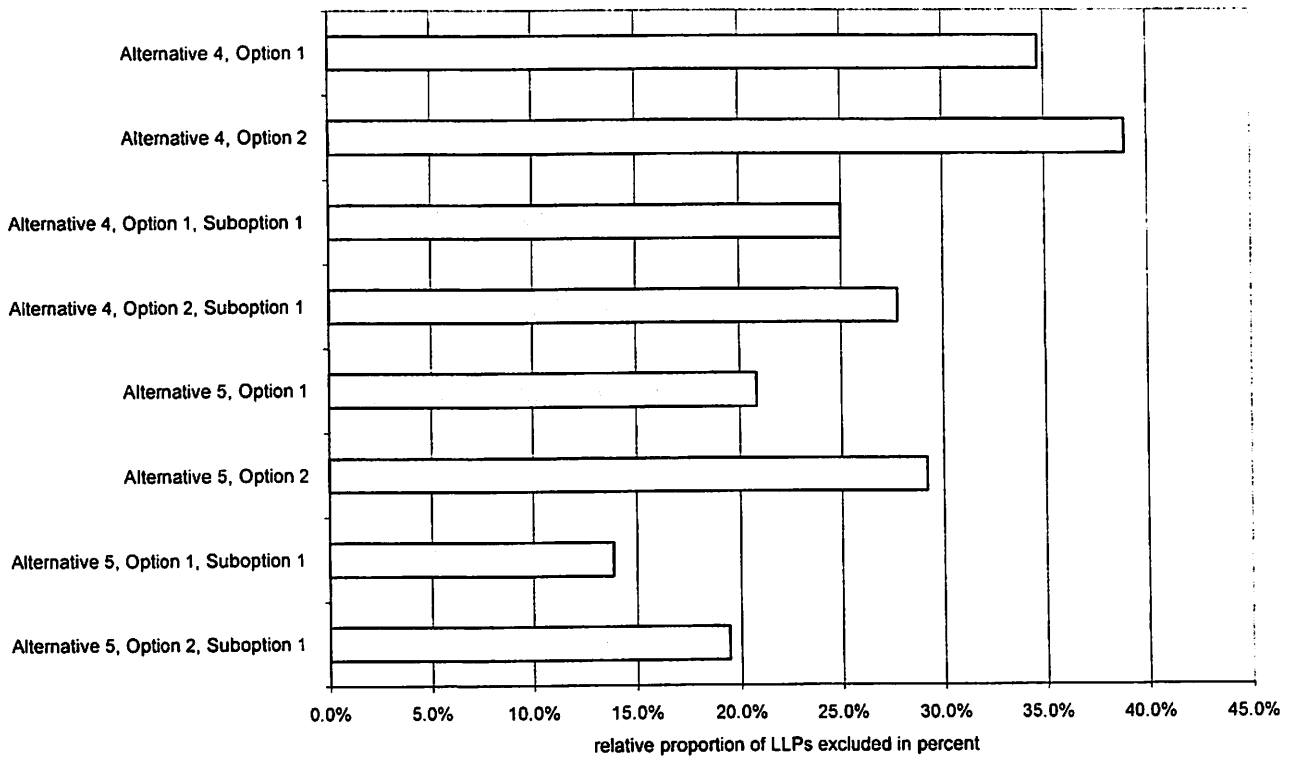
**Figure 3: Non-AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative AI Alternatives 4 and 5**



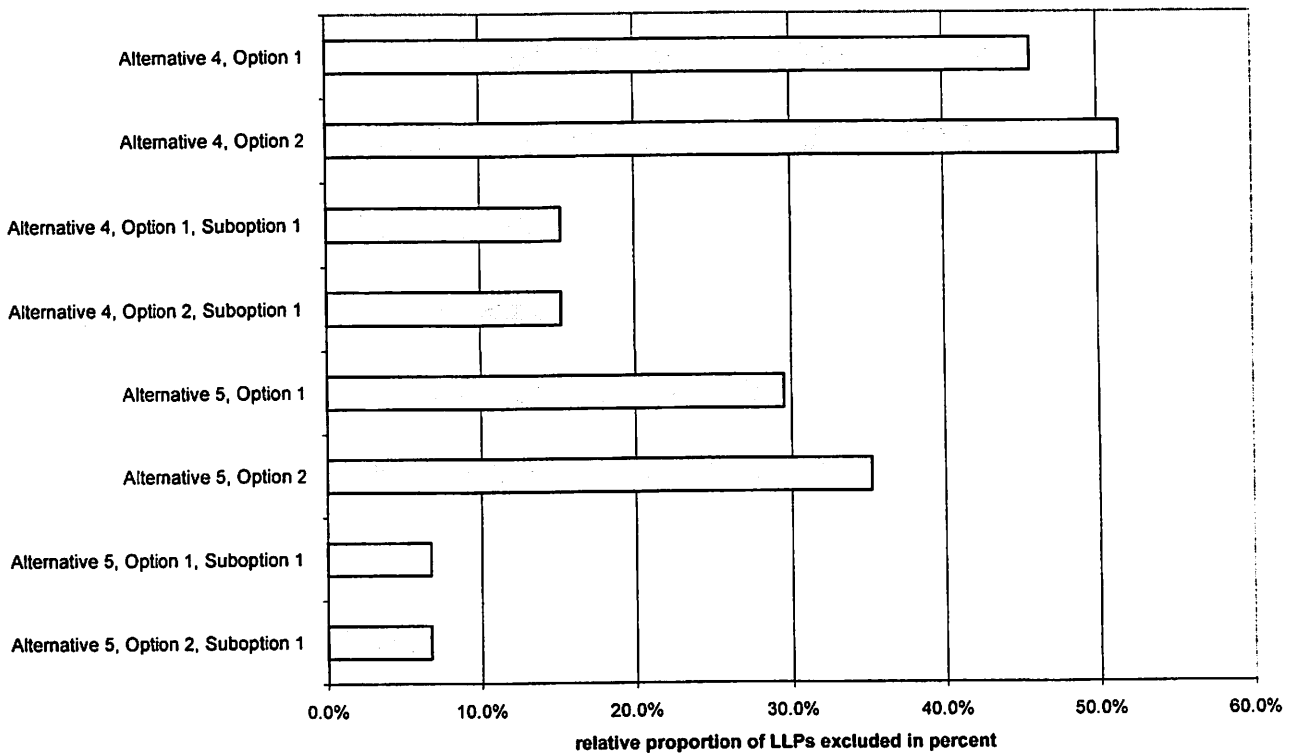
**Figure 4: Non-AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative BS Alternatives 4 and 5**



**Figure 5: Non-AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative WG Alternatives 4 and 5**

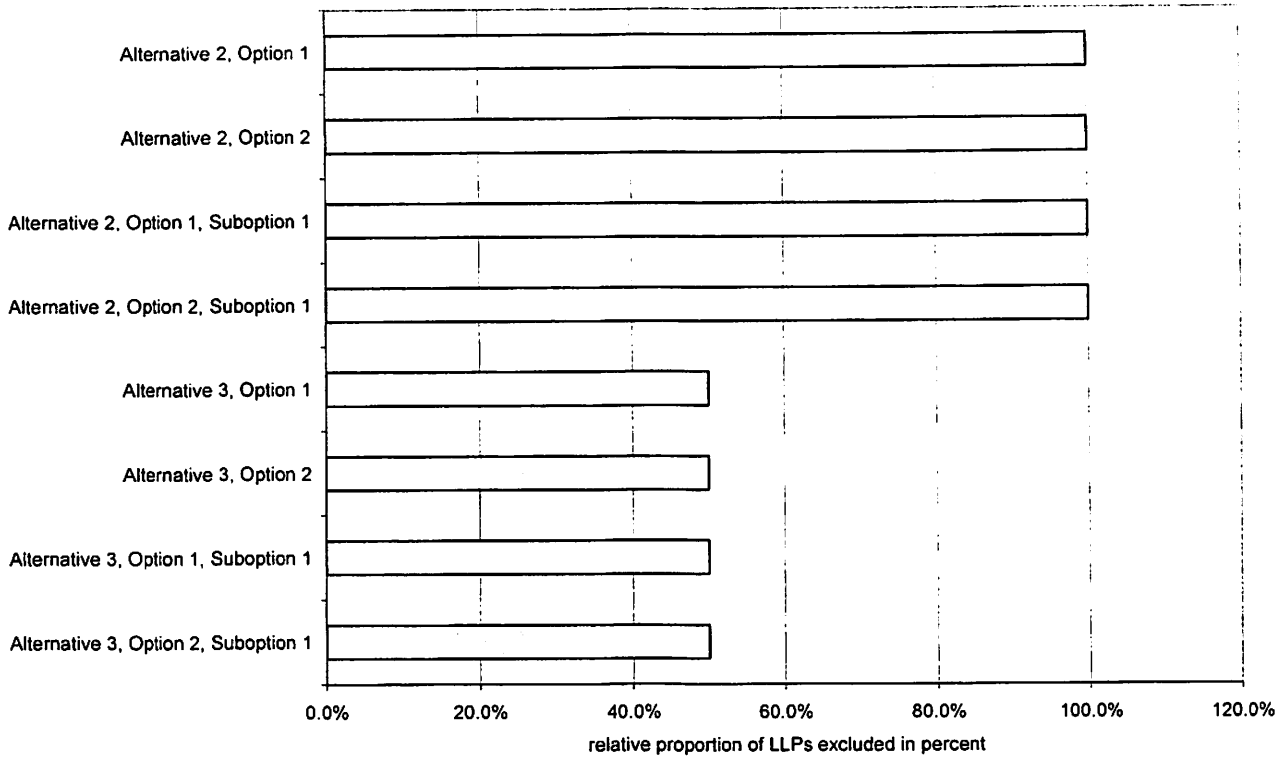


**Figure 6: Non-AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative CG Alternatives 4 and 5**

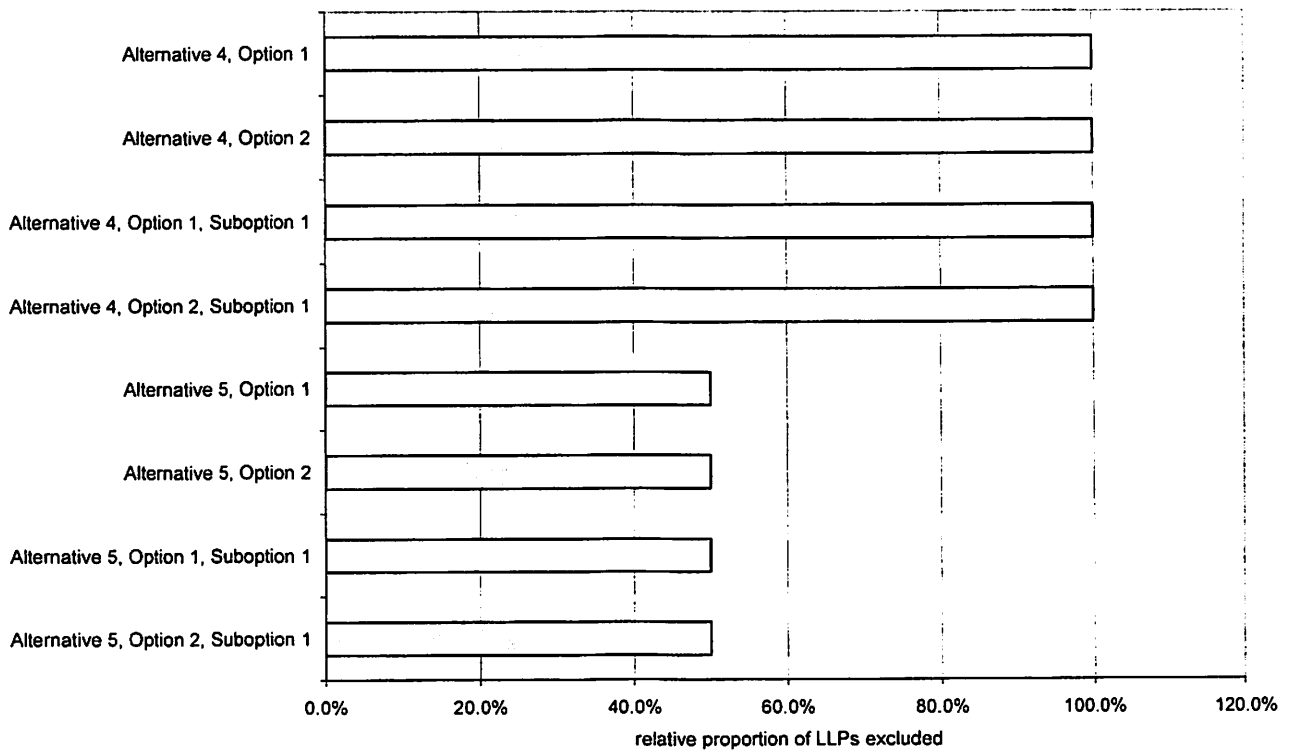




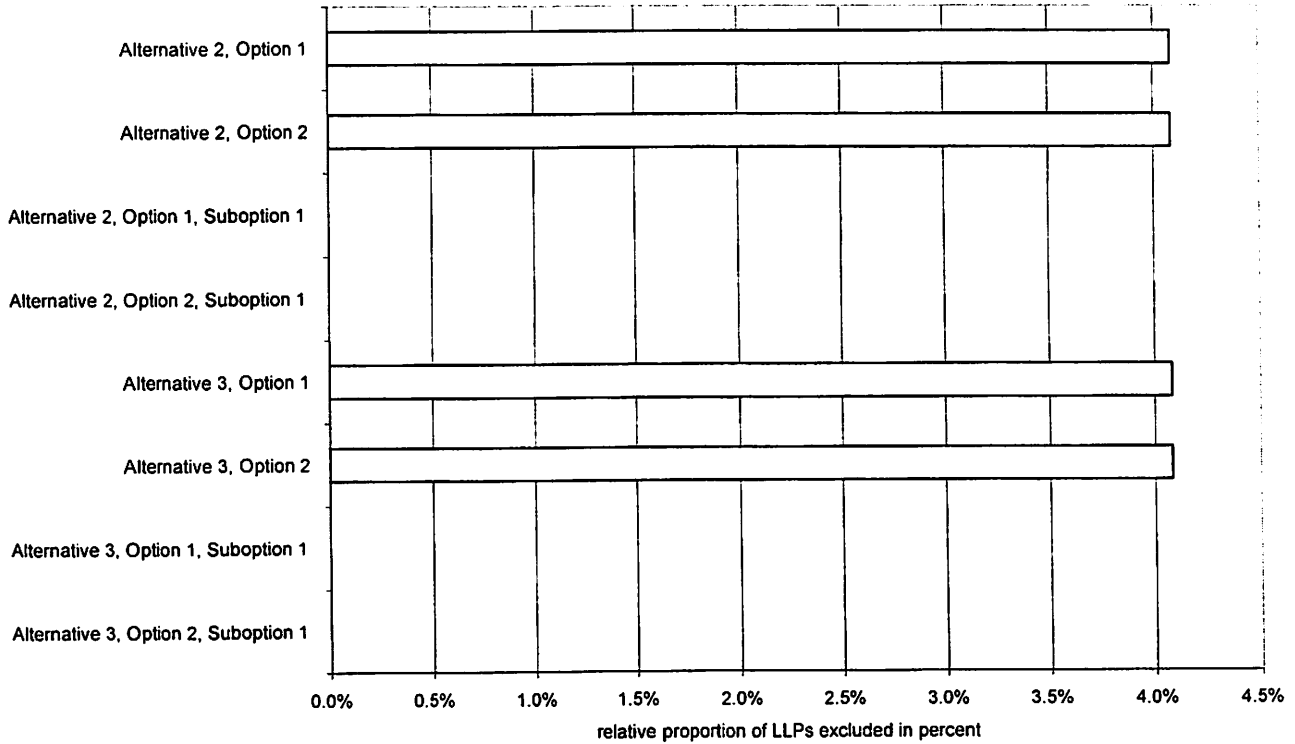
**Figure 7: Non-AFA Trawl CPs - Proportion of Total LLPs Excluded, by Alternative GOA Alternatives 2 and 3**



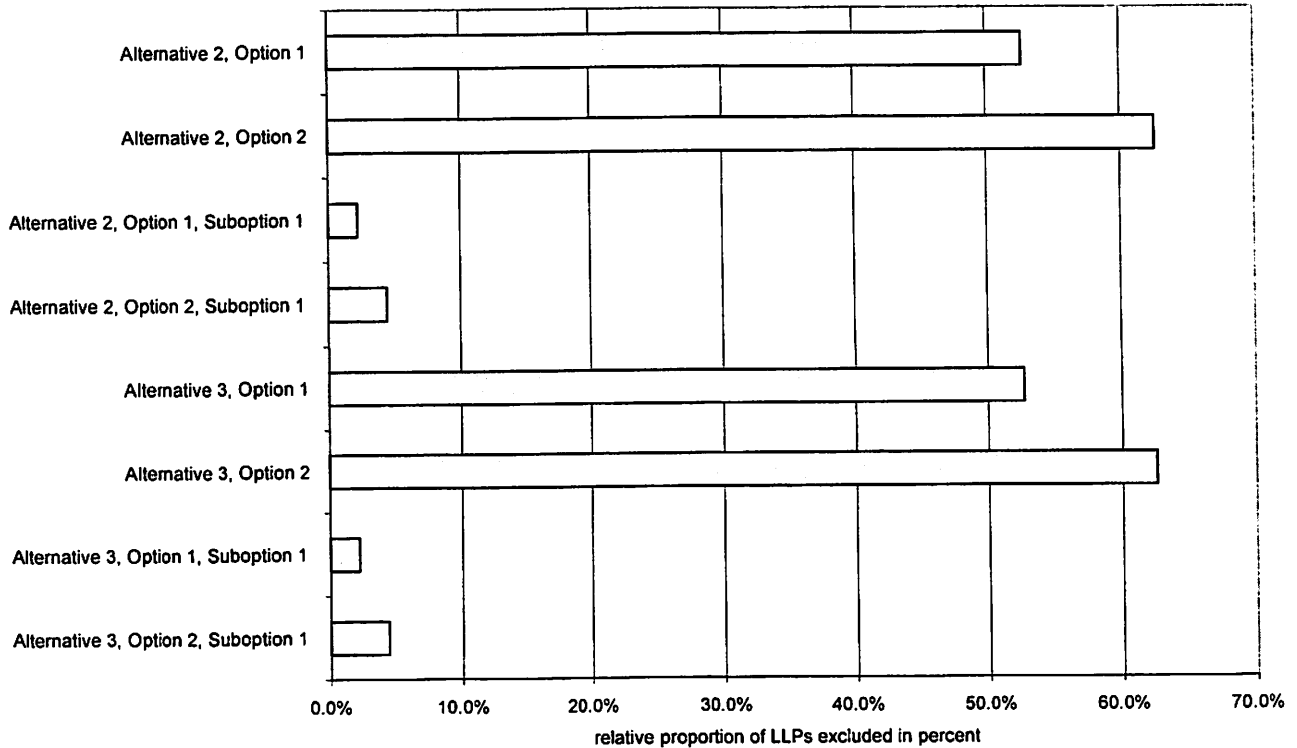
**Figure 8: Non-AFA Trawl CPs - Proportion of Total LLPs Excluded, by Alternative CG Alternatives 4 and 5**



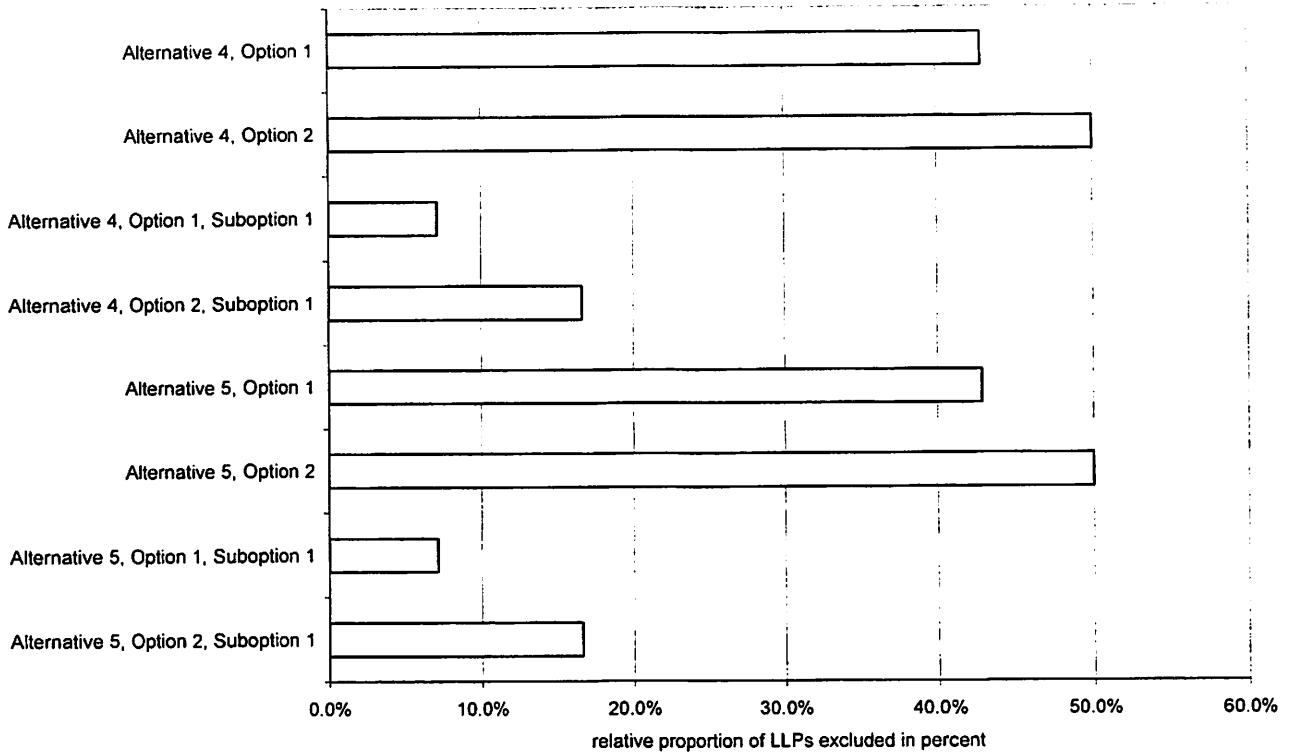
**Figure 9: AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative BSAI Alternatives 2 and 3**



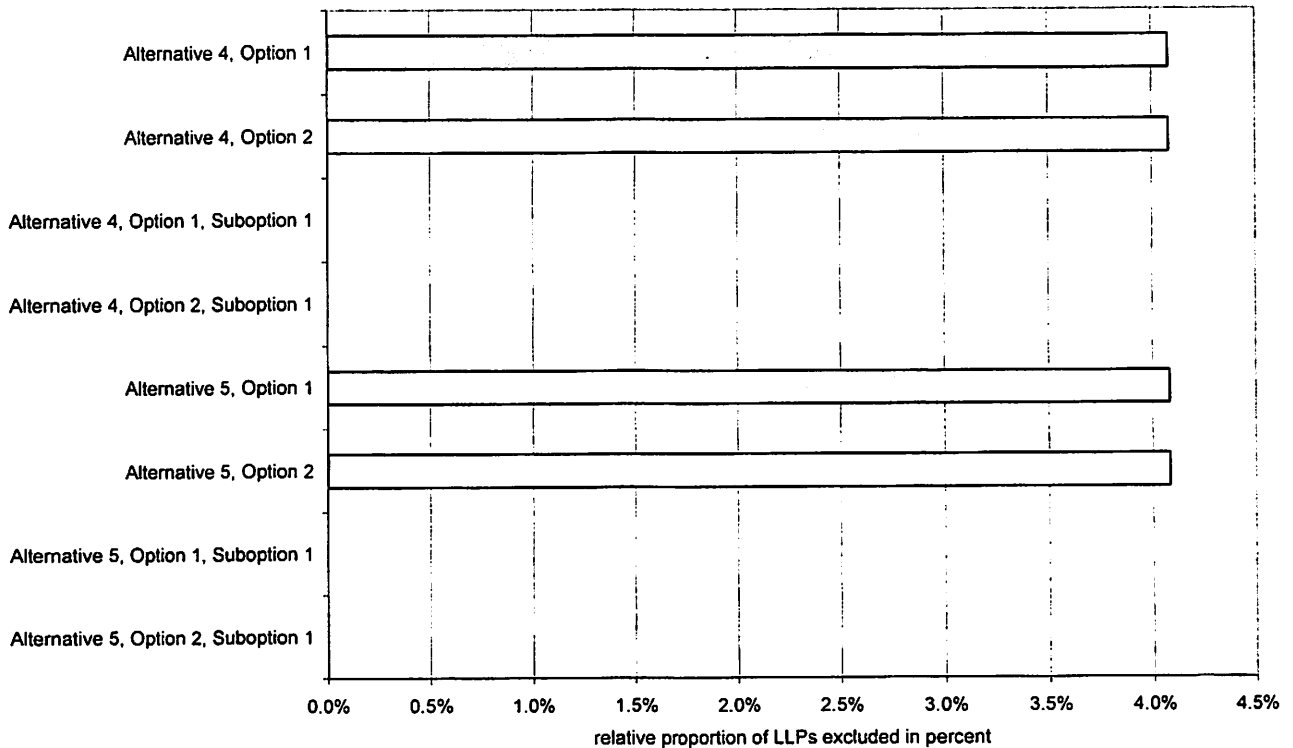
**Figure 10: AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative GOA Alternatives 2 and 3**



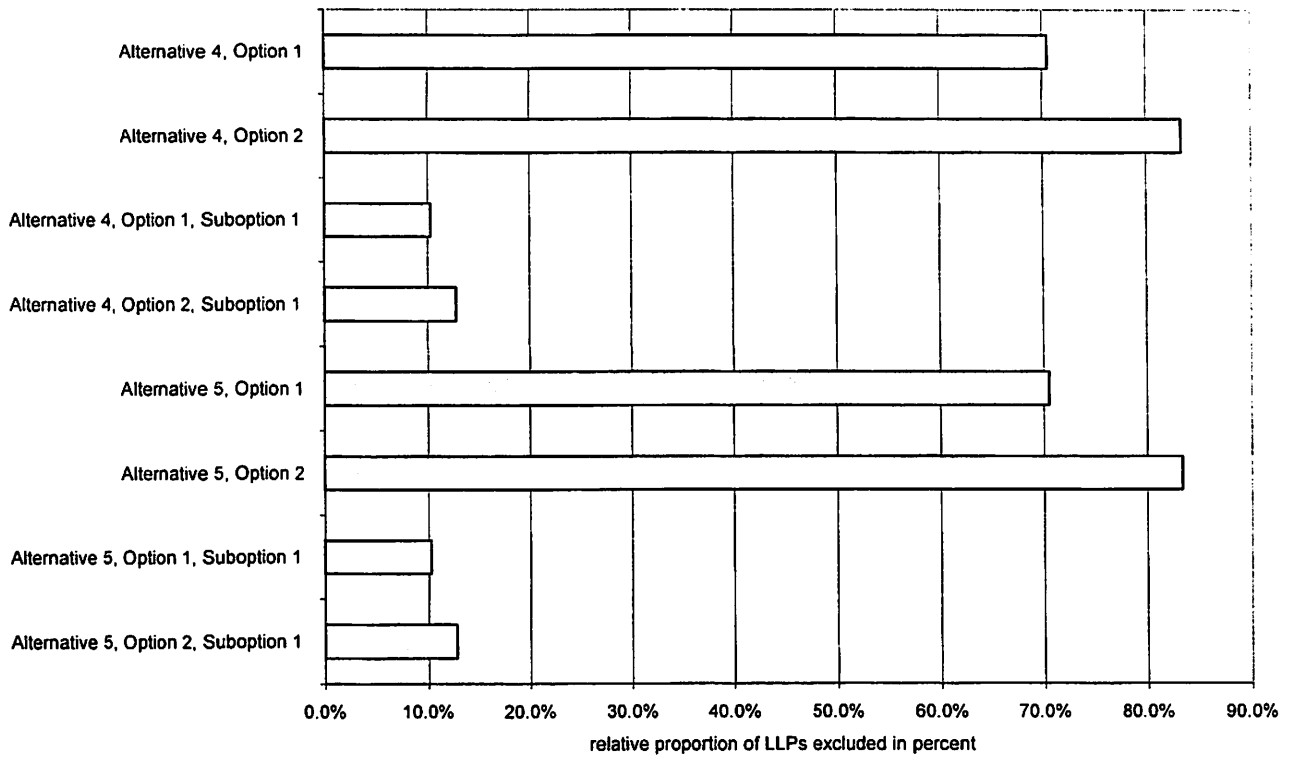
**Figure 11: AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative AI Alternatives 4 and 5**



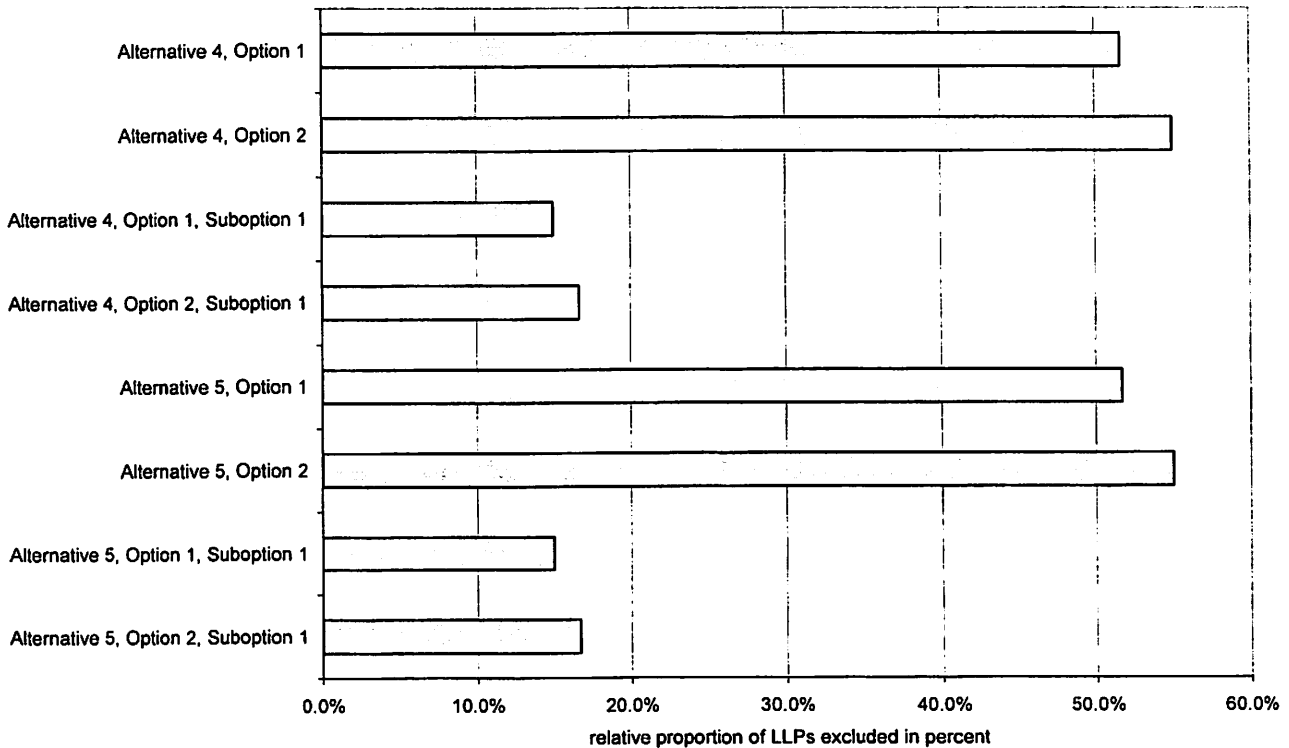
**Figure 12: AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative BS Alternatives 4 and 5**



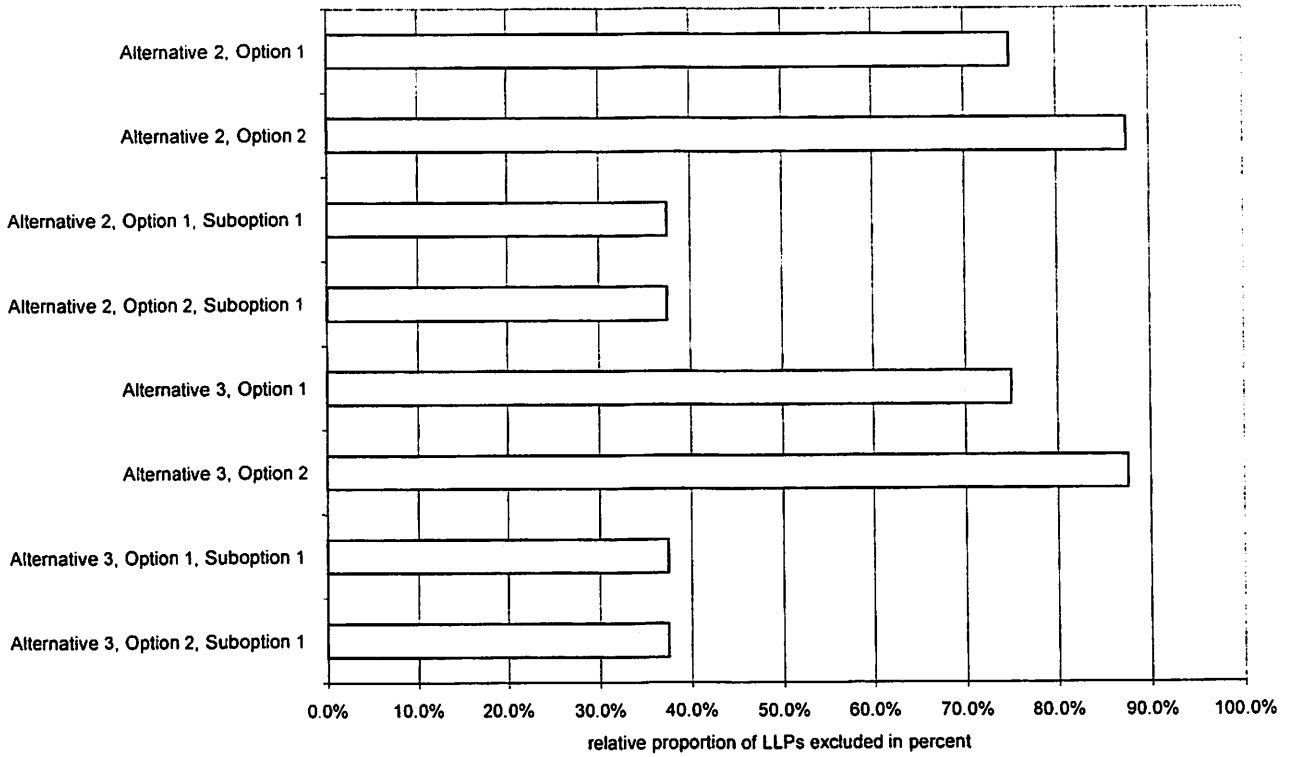
**Figure 13: AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative WG Alternatives 4 and 5**



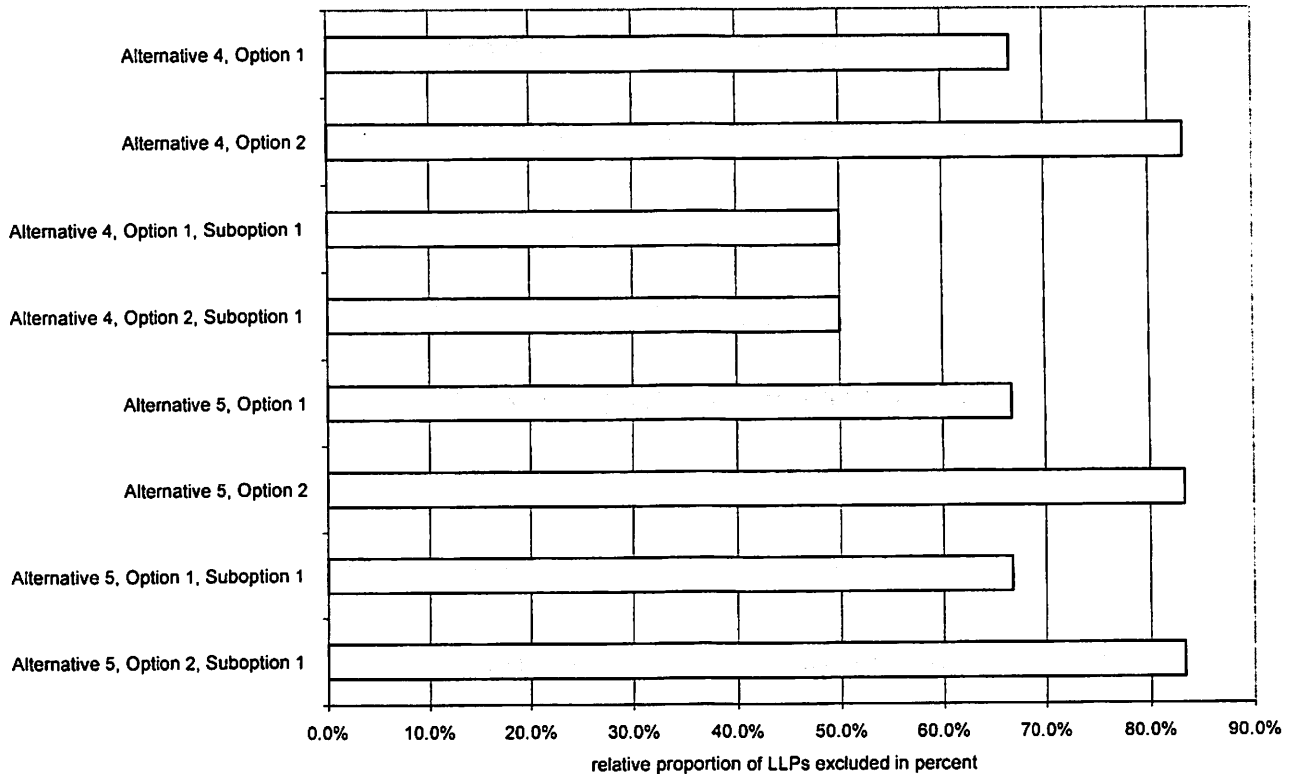
**Figure 14: AFA Trawl CVs - Proportion of Total LLPs Excluded, by Alternative CG Alternatives 4 and 5**



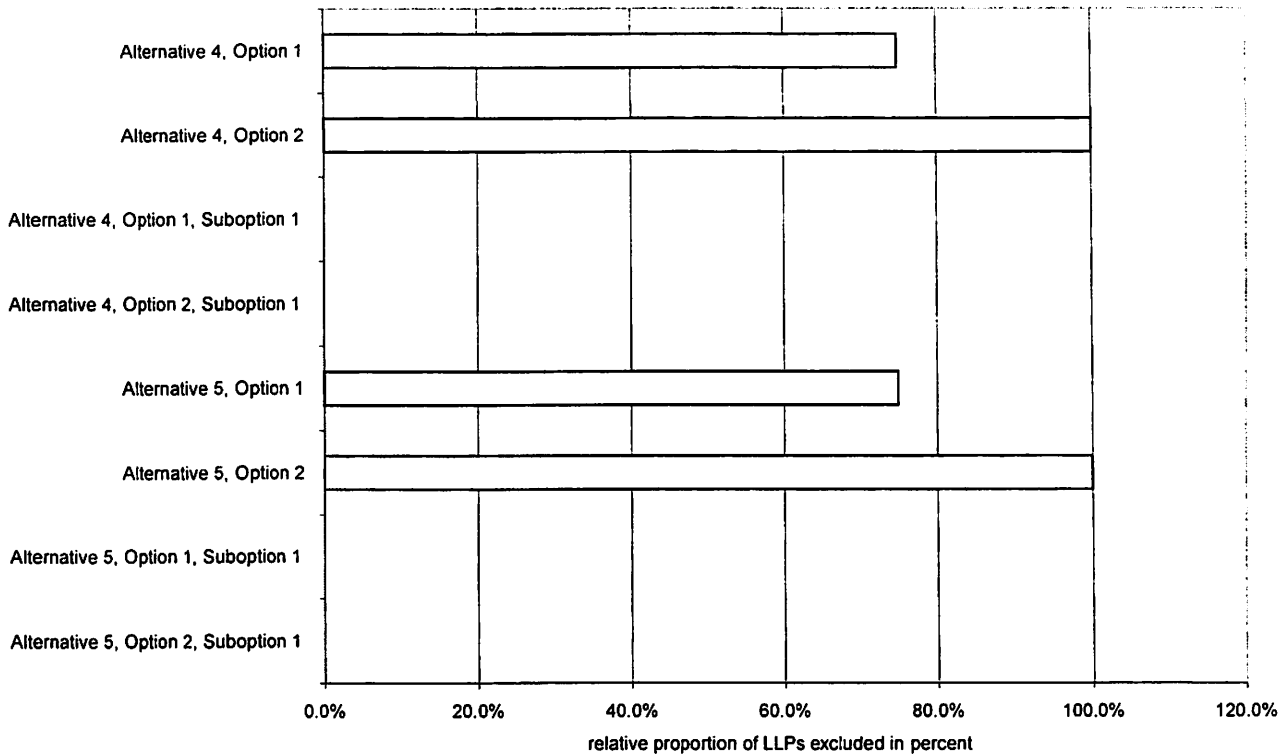
**Figure 15: AFA Trawl CPs - Proportion of Total LLPs Excluded, by Alternative GOA Alternatives 2 and 3**



**Figure 16: AFA Trawl CPs - Proportion of Total LLPs Excluded, by Alternative WG Alternatives 4 and 5**



**Figure 17: AFA Trawl CPs - Proportion of Total LLPs Excluded, by Alternative CG Alternatives 4 and 5**



## 8.0 MANAGEMENT ISSUES FOR THE ALEUTIAN ISLAND GROUND FISH FISHERY

For the February 2007 Council meeting, staff has prepared a short discussion paper that discusses the potential cross effects that the amendment will have with: (a) the proposed action being considered by the Council to divide the Bering Sea/Aleutian Islands Pacific cod allocations into separate Bering Sea allocations and Aleutian Islands allocations, and to combine the Bering Sea and Aleutian Islands license endorsements into a single Bering Sea/Aleutian Islands endorsement,; and (b) an action to be discussed that would make sector allocations of Gulf of Alaska Pacific cod and remove latent licenses from the Gulf of Alaska fisheries.

Both of these actions would have a considerable regulatory overlap with this proposed amendment. For example, one alternative under consideration under (a) above, would allow an increase in the number of AI Pacific cod endorsements by 253, a radical change from the current situation.

## Key for Trawl Recency Alternatives

### Management area differentiation

- Alternatives 2 & 3 are based upon **BSAI/GOA** areas
- Alternatives 4 & 5 are based upon **AI, BS, WG, CG** areas

### Harvest means differentiation

- Alternatives 2 & 4 specify only trawl groundfish harvests
- Alternatives 3 & 5 specify both trawl and non-trawl (fixed gear) harvests of groundfish

### Qualification period/threshold level differentiation

- **Component 1 - Option 1** includes groundfish harvests for the period 2000-2005 (requires at least one landing)
- **Component 1 - Option 1, suboption 1** includes groundfish harvests for the period 1995-2005 (requires at least one landing)
- **Component 1 - Option 2** includes groundfish harvests for the period 2000-2005 (requires at least two landings)
- **Component 2 - Option 2, suboption 1** includes groundfish harvests for the period 1995-2005 (requires at least two landings)

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AGENDA C-5  
Supplemental  
FEBRUARY 2007

RECEIVED  
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N.P.F.M.C.

January 17, 2007

VIA FACSIMILE (907) 271-2817 and MAIL

Ms. Stephanie Madsen, Chair  
North Pacific Fisheries Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, Alaska 99501-2252

**Re: North Pacific Fishery Management Council Meeting  
February 7-13, 2007. Portland, Oregon  
C-5 Trawl LLP Recency; Initial Review of Analysis. (T)  
Our File: 41.78**

Dear Council Chair:

We represent Arctic Sole Seafoods, Inc. and submit comments related to the Council's above-referenced agenda item. Arctic Sole is owned and managed by a long-time fishing family, who was operating in the early 1980's as one of the first 10 captains pioneering Gulf of Alaska and Bering Sea/Aleutian Islands.

Arctic Sole owns two vessels, the 58-foot Decade (LLG 3921) and the 99-foot Ocean Cape (LLG 3895). The Decade is qualified to fish in the central and western GOA and the BS/AI. Each of these vessels are licensed to fish for groundfish in the GOA and BS/AI. Both are LLP-qualified vessels. The Ocean Cape also has a processing permit. Arctic Sole has spent 2 years rebuilding and re-gearing the Decade, which was purchased in 2004. The Ocean Cape, which was purchased in 2005, should be ready this year. These vessels were purchased, reconstructed, and re-gearred in anticipation that they would both participate in relevant BS/AI and GOA groundfish fisheries. Both



are in the process of major construction involving a substantial effort and expense by the owner.

The Components of Alternatives for the Trawl LLP Recency Component prepared by Council staff and under consideration by the Council, all include a number of possible choices for landings criteria, and all choices require a certain number of groundfish landings during specific times. In staff's Agenda Item C-3 Trawl LLP Recency Supplemental Handout, A Summary of Preliminary Analyses for Application of Threshold LLP Harvest Level Alternatives (revised 12/6/06), each Alternative presented (except the no action alternative) implemented a LLP threshold criteria based upon some kind of landing requirement.

Because the owner of the Decade and Ocean Cape has taken substantial steps toward participation in GOA and BS/AI groundfish fisheries, and because both of these vessels are already qualified to fish in GOA and BS/AI groundfish fisheries, any proposal the Council adopts that requires a landing or landings during time periods under consideration would exclude these vessels from participation in these fisheries. If, for example, the Council considers proposals that require landings between 2000 and 2005, that proposal would effectively exclude the Decade and the Ocean Cape in GOA and BS/AI groundfish fisheries.

Therefore, any proposal the Council adopts related to any C-5 Trawl LLP Recency Component must allow a vessel to qualify in GOA BS/AI groundfish fisheries if the following factors exist:

- 1) The vessel is LLP qualified, and;
- 2) If the vessel has not made requisite landings during the qualifying period, the vessel will otherwise qualify if the vessel owner can document:
  - a) That the vessel had participated and made landings outside the qualifying period, and;
  - b) The vessel owner can:
    - i) demonstrate that the vessel has not made the required landings during the qualifying period but that the reason that the landings were not made


- was a result of modifications to, or construction on, the vessel, and;
- ii) document that a substantial amount of time and money had been spent on the vessel's modifications or construction, and;
  - iii) the amount spent on modifications or reconstruction is equal to or greater than the purchase price of the vessel, and;
  - iv) but for the modifications to, or construction on, the vessel, the vessel intended to participate in the relevant fisheries.

Adoption of these factors should benefit the rationalization process engaged in by the Council.

The Council stated that trawl vessel owners who have made significant investments, have long catch histories, and are dependent upon BS/AI and GOA groundfish resources need protection from others who have little or no recent history, with the ability to increase their participation in the fisheries. The Council wants to promote stability in the trawl catcher vessel sector in the BSAI and the trawl vessel sector in the GOA until comprehensive rationalization is completed. Adoption of these factors as part of any alternative the Council considers on this Agenda Item, will address the equities of a very limited number of situations and vessels, and the small cumulative impact of adopting the factors will still allow the Council to meet its goals.

Adoption of the proposed factors will also address the vessel owner's situation, who has, and is, making significant investments in a vessel, allow vessels with long catch histories, and still require the vessel and the vessel's owner to be dependent upon BS/AI and GOA groundfish resources.

Very Truly Yours,



Bruce B. Weyhrauch

**PRITCHETT & JACOBSON, P.S.**

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January 30, 2007

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Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 W Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Re: Agenda Item C-5, Trawl LLP Recency

Dear Madam Chair:

I am writing on behalf of the Independent Cod Trawlers Association, consisting of Charles Burrece of the F/V Lone Star, Steve Aarvik of the F/V Windjammer, and Omar Allinson of the F/V Miss Leona. As you know, all three vessels are non-AFA trawl catcher vessels. As shown by the Public Review Draft for Amendment 85<sup>1</sup> these three vessels have caught as much as 83% of the total non-AFA trawl CV cod harvest in the Bering Sea/Aleutian Islands, as recently as 1999.

Since 2000, these three vessels have been negatively impacted by additional competition on the BSAI cod grounds due to (1) an earlier than historic level of participation by AFA vessels freed up by the cooperative system, and (2) additional effort from non-AFA CV's entering the BS but unable to enter the pollock fishery because of the AFA.

Although Messrs. Burrece, Aarvik, and Allinson have been requesting relief

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<sup>1</sup> Table 3-60, at page 184 (March 12, 2006).

from the Council in various forms since 2000, no measures have been effected to date which would serve to recognize and protect their long participation in, and dependence upon, the BSAI fisheries. In large part because of the race for fish in the cod trawl CV fishery, all three vessels began in 2006 to also participate in Aleutian Islands fisheries which are not subject to federal LLP restrictions.

The problem statement for BSAI and GOA trawl LLP analysis recognizes that, "In the Bering Sea and Gulf of Alaska, there are too many latent licenses and in the Aleutian Islands there are not enough licenses available for trawl catcher vessels." The problem statement also recognizes that:

"Trawl vessel owners who have made significant investments, have long catch histories, and are dependent on BSAI and GOA ground fisheries need protection from others who have little or no recent history and with the ability to increase their participation in the fisheries."

With respect to the Aleutian Islands, the problem statement emphasizes the shortage of AI endorsements for non-AFA vessels by noting (1) that there are only six non-AFA CV trawl AI-endorsed LLPs, and (2) that Council action under Amendment 80 to allocate a portion of AI POP and Atka mackerel to the limited access fleet is effectively limited to non-AFA vessels with AI CV trawl LLP endorsements.

Additional AI LLP endorsements for vessels which have participated in the AI parallel or State waters CV trawl fisheries through 2006 would serve both to (1) provide the additional licenses needed in the AI in order to harvest the POP and Atka mackerel set aside by Amendment 80, and (2) facilitate the economic development of Adak which is emphasized in the problem statement.

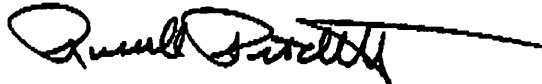
On the other hand, issuing AI cod endorsements to all BS trawl CV's would result in a derby-style cod trawl CV fishery in the AI, which would not serve the problem statement purposes of facilitating the further development of a resident fishing fleet, and the creation of stable economic development in Adak.

On behalf of the three vessels in the Independent Cod Trawl Association, we respectfully request that the Council take action to limit the race for fish to the extent possible in the Bering Sea by strongly addressing the LLP latency issue,

while at the same time ensuring that any proposed measures do not result in a race for fish in the Aleutian Islands. In the Aleutian Islands, recency and dependency would also be served by limiting additional AI endorsements to vessels with AI parallel or State water deliveries in or before the year 2006.

Finally, we request that the wider all-species LLP issues be segregated from the BS/AI cod split issue, which is limited to cod allocations.

Sincerely,



Russell W. Pritchett

#328/all-chair.fx  
Allinson #135A15

**SEA STORM FISHERIES, INC.**

400 North 34th Street, Suite 306  
Seattle, Washington 98103 U.S.A.

Stephanie Madsen, Chair  
NPFMC  
605 W. 4<sup>th</sup> Ave. Suite 306  
Anchorage, AK 99501  
Sent via Fax: 907-271-2817

January 29, 2007

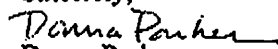
RE: Item C-5 Trawl LLP Recency

Dear Madam Chair,

The FV Sea Storm and FV Neahkahnie are AFA catcher vessels engaged in the BSAI and GOA fisheries. We appreciate the paper prepared by staff on actions to revise LLPs in the BSAI and GOA. It heightened our concern that many overlapping issues have been incorporated into a single proposed action. We share the concern that in combining some of these issues, redundancy and inconsistencies may have compromised the ability of the public to understand the potential impacts of the decisions. We'd like the Council to take action that would simplify and clarify the proposed LLP recency action.

- 1) **AFA**. The proposed action to reduce BSAI trawl licenses would eliminate some AFA LLPs and, in so doing, would supersede Congressional action which created AFA permits. Specifically, if the AFA vessels lost their LLPs, they would lose their AFA permits and the ability to participate in the BSAI pollock fisheries. It was never the intent to eliminate AFA permits in this action and that should be clarified in the problem statement, rather than being offered as a sub-option.
- 2) **Consistent Actions**: Proposed revisions to the LLP originated in the BSAI and have since been expanded to include the GOA. Because these two parallel actions to eliminate latent licenses would seem to benefit from coordinated action, we support that they be combined into a single action.
- 3) **Inconsistent Actions**: While combining actions to reduce trawl licenses in all areas makes sense, combining actions that seek to simultaneously reduce LLPs in all areas and selectively increase LLPs in the AI seems an action at cross purposes. In order to have a transparent decision-making process, it should occur in a sequential fashion. It makes sense to first know how many AI LLPs would be eliminated before it can be determined whether new ones should be added. That cannot be determined until the Council takes action to reduce BSAI LLPs. For this reason, we recommend that the second part of this action, to increase AI endorsements, be severed from this analysis and be considered as a separate or trailing action.

Thank you for consideration of our concerns on these important issues.

Sincerely,  
  
Donna Parker



January 30th, 2007

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK  
99501-2253

RE: License Limitation Program actions

Dear Madame Chair,

The discussion paper on LLP latency suggests the Council may wish to "combine the AI LLP action with the BSAI Pacific cod LLP action." It states the split "is likely a prime motivation for increasing the number of licenses qualified for the Aleutians under both actions."

While the LLP problem statement begins with a general statement, the problem identified is not that there is a serious general shortage of AI fishing capacity.

"In the Bering Sea and Gulf of Alaska, there are too many latent licenses and in the Aleutian Islands there are not enough licenses available for trawl catcher vessels."

The specific problem is presented in a later paragraph. It states:

"In the Aleutian Islands, previous Congressional and Council actions reflect a policy encouraging economic development of Adak. The opportunity for non-AFA CVs to build catch history in the AI was limited until markets developed in Adak. *The analysis indicates that there are only six non-AFA CV trawl AI endorsed LLPs.* The Congressional action to allocate AI pollock to the Aleut Corporation for the purpose of economic development of Adak requires that 50% of the AI pollock eventually be harvested by <60' vessels. *The Council action under Am. 80 to allocate a portion of AI POP and Atka mackerel to the limited access fleet does not modify AFA CV sideboard restrictions, thus participation is effectively limited to non-AFA vessels with AI CV trawl LLP endorsements.* A mechanism is needed to help facilitate the development of a resident fishing fleet that can fish in both state and federal waters. The Council will consider different criteria for the CV Eligibility in the AI."

This paragraph says that the specific problem is a lack of AI LLP endorsements for non-AFA vessels, but does not say it is cod specific.

There are two groups of non-AFA vessels that need endorsements in order to benefit from Am. 80 – the “three Amigos” and <60’ vessels. The October action by the Council (to add a new option that would convert separate BS and AI LLP area endorsements into combined BSAI area endorsements for the BSAI Pacific cod) addresses a separate issue and works counter to the LLP problem statement.

Issuing AI cod endorsements to all BS trawl CVs goes well beyond allowing the non-AFA CV (the 3 Amigos & <60’ vessels) access to Am. 80 AI species and encouraging a development of a local fleet with access to a variety of species.

Issuing AI cod endorsements to all BS trawl CVs doesn't really address providing AI endorsements to most of the 60' vessels targeted by the problem statement, since most of the 60' vessels with history in the AI parallel fishery don't have BS endorsements. However, several 60' boats do all ready have a significant history in parallel AI cod fisheries, and they would also be negatively impacted by accelerating the cod derby in the AI by indiscriminately providing endorsements to vessels without AI history.

Accelerating the AI cod derby by flooding the AI with as many CV trawl endorsements as the BS would also “discourage economic development of Adak” and would not “facilitate the development of a resident fishing fleet that could fish in both state and federal waters.”

We ask that the Council exercise caution in combining the LLP issue with the BS/AI cod split issue. If you do combine these issues, we ask that you 1) not lose focus on the specific problem identified in the LLP latency issue, and 2) avoid exacerbating the race for fish by creating excess capacity in the AI.

Thank you for the opportunity to comment on this very important issue.

Sincerely,



Sandra Moller  
President and CEO