Program Review for the Central Gulf of Alaska Rockfish Program

North Pacific Fishery Management Council
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Executive Summary

A program review of the Central Gulf of Alaska Rockfish Program (Rockfish Program or RP)[1] is required under the Magnuson-Stevens Fisheries and Conservation Act and an allocation review of the RP is required by National Oceanic and Atmospheric Administration (NOAA) Fisheries, also commonly known as the National Marine Fisheries Service (NMFS). This paper fulfills those review requirements, focusing on the goals and objectives of the program defined by the North Pacific Fishery Management Council, Magnuson-Stevens Fisheries and Conservation Act limited access privilege program requirements, and NOAA Fisheries guidance for program reviews. This review includes quantitative measures of the effectiveness of the program meeting the goals and objectives when data allows. A qualitative discussion of the impacts is provided when sufficient data are unavailable to produce a quantitative impact analysis.

The Rockfish Pilot Program (Pilot Program or RPP) was implemented to improve economic, biologic, and safety conditions in the Central Gulf of Alaska (GOA) rockfish fisheries. Specific elements of the RPP were modified under the RP to improve the program and comply with the legal authority granted to NOAA Fisheries. The RP was designed to retain the conservation, management, safety, and economic gains created by the RPP. This review also considers the impacts of changes made to the RP since it was implemented, including changes that have been recently implemented.

Table E.1 provides a summary of the goals and objectives of the RP, based on the Council's motion as analyzed in the Environmental Assessment and Regulatory Impact Review for the program (NPMFC, 2011). The information provided in the table indicates that almost all the Council's goals and objectives were met. However, economic conditions currently being realized by almost all of Alaska fisheries have had substantial negative impacts on the RP fisheries. The reader is also referred to the Summary and Conclusions section of this document for a more detailed summary of the program's impact on harvesters, processors, and communities.

Table E-1. Summary table of stated goals and objectives of the RP.

Goal/Objective	Successful?	Description
Allow full retention of allocated species	Yes	• Cooperative quota (CQ) allocations eliminate regulatory discards when fishing in cooperatives (Section 9) and include full retention requirements. • Retention rates of rockfish species allocated in the RPP and RP are high compared to the limited access fisheries. (Table 9-1 and Table 9-2)
Reduce halibut bycatch	Yes	• Catcher vessel (CV) halibut rates are approximately 10 percent of the pre-RPP limited access fishery rate (Section 6.2.1) • Catcher Processors (CPs) have reduced their halibut mortality by about 50 percent (Section 6.2.2)
Reduce Chinook salmon bycatch	Some years	• Chinook salmon bycatch is variable year-to-year (Figure 6-1 and Figure 6-3) • CV Chinook salmon bycatch ranged from a low of 54 fish (2020) to a high of 1,802 fish (2015) under the RP and RPP.

[1] https://www.npfmc.org/library/acronyms/

Goal/Objective	Successful?	Description
		• Industry members continue to try new methods to reduce Chinook salmon bycatch but challenges remain.
RP removed disincentives for some CP operators to join cooperatives	Yes	• All CP license limitation program (LLP) licenses with quota shares (QS) are assigned to a cooperative under the RP (Section 4.1)
Allow for a more rational distribution of effort	Yes	• The Central GOA rockfish fishery has changed from an approximate 3-week fishery in July to one that primarily harvests fish in May and June, slows during the summer, and increases again in the fall (Table 5-12)
Improved NMFS' ability to conserve and manage the species in the program	Yes	• Cooperative management and removing the entry-level trawl fishery has eliminated NMFS management of small Central GOA trawl rockfish Total Allowable Catches (TACs)
Increased vessel accountability	Yes	• Vessel accountability is addressed through private contracts within the cooperative (Section 4.2) • Individual cooperatives monitor the harvest of their members to ensure that no member exceeds their limit for an individual species (Section 4.2)
Controlled capacity of the fleets	Yes	• The Central GOA rockfish fisheries are a relatively small component of the fleet's annual fishing cycle, but cooperatives can control fishing power and due to the changes in markets in recent years fewer vessels have participated (Section 4) • Success of the cooperative structure has also allowed voluntary cooperatives to be formed in the Central GOA pollock fishery some years (Section 8.1.1)
Controlled consolidation	Yes	• Ownership and use caps are imposed to limit consolidation of QS and CQ (Section 11.2) • Fewer vessels, processors, and crew participate in the fishery now relative to the past. Reduced participation is partially due to current economic conditions and not the structure of the RP (Section 5.3, Section 5.4 and Section 13.
Reduced trawl gear contact with the sea floor	Yes	• The fleet employs greater use of pelagic gear (Section 15) • The 2017 Fishing Effects Model indicates that the percentage of habitat disturbance is less than 5 percent and is steady or declining for all three species. Habitat reduction tends to be less than 1 percent in most areas, but the highest habitat reduction levels focus on the same general areas for all species. (Section 15)
Improved safety at sea	Yes	• There were no work-related crewmember fatalities or vessel disasters under the RPP or RP (Section 14)

Goal/Objective	Successful?	Description
		• The good safety record may be due to an extended fishing season that reduces pressure to fish when the weather is bad and can reduce crewmember fatigue (Section 14)
Kodiak and shoreside processing sector have benefited from the stabilization of the workforce	Yes	• The timing of peak rockfish fishery harvests moved so they did not interfere with the salmon fishery, helping to stabilize the processing workforce. Also, local workers who may have relied on unemployment compensation during April/May and part of June have increased access to work in the plants (Section 18.1.3.2)
More stable markets	No	• World market supplies for rockfish and substitute species, currency exchange rates, consumer demand, and supply chain changes have a greater impact on markets than the RP (Section 8)
Allows for more shoreside deliveries of rockfish	Yes	• The Central GOA Pacific ocean perch TAC has increased, discards of rockfish species have declined, and the rockfish fishery has not closed because of halibut PSC limits being reached (Section 5.1, Section 8.1, and Table 2-1) • A greater percentage of the primary species TAC is allocated to the CV sector (Table 5-5) • Regulations allow CQ transfers from the CP sector to the CV cooperatives, but not vice versa.
Additional non-rockfish deliveries with the halibut savings	Yes	• The amount is difficult to quantify • The amount of halibut PSC that could be rolled over under the RP (up to 55 percent of the unused amount) ranged from 55 metric tons (mt) to 71 mt depending on the year (Section 6.2) • Additional halibut could be used to increase groundfish harvests, especially when it is a binding constraint (e.g., 2016) (Section 6.2)
Increased rockfish quality and diversity of rockfish products	Yes and No	• Raw fish delivered under the RPP and RP are reported to be higher quality than under the limited access fishery (Section 8.1) • Product diversity has not changed noticeably because the high cost of value-added processing and shipping, and the relatively low product prices for rockfish (Section 7.1)
Resolved RPP issues in the management and viability of the entry-level fishery	Yes	• The trawl entry-level fishery was eliminated (Section 2.4.2) • Three LLP licenses that fished with trawl gear in the entry-level fishery were issued QS in RP (Section 18.4) • The longline entry-level fishery allocation formula was changed, and the allocation is now increased if catch in the previous year exceeds set amounts (Section 5.2.1)

Goal/Objective	Successful?	Description
		• Dusky rockfish is the only species whose entry-level longline allocation has been increased under the RP, but effort in that fishery has declined in recent years (Section 5.2.1). Catch amounts are currently very small for all three primary rockfish species.
Fishery Allocation Review	Yes	• Based on the information presented by stakeholders, information presented in the RP Review, and discussion with fishery managers, no evidence has been presented that suggests revisiting the RP allocations is needed (Section 18)

Full retention is mandated under the RP. CQ allocations eliminate regulatory discards that are imposed when fisheries are closed to directed fishing and bycatch is managed using maximum retainable amounts (MRAs). Under the RP, cooperatives manage their allocation and all cooperative fishing closes when the cooperative checks out of the rockfish fishery or their allocation is taken. CQ allocations include full retention requirements. Full retention requires harvesters to retain all the CQ species caught, and that catch is deducted from the cooperative's allocation. Retention rates in the RPP and RP are very high, with rates approaching 100 percent for each primary RP species. Secondary RP species retention rates are only slightly lower than the primary RP species retention rates. Discards have been reported in the RP cooperative reports and typically only occur because of safety issues.

The CV and CP sectors have reduced their halibut mortality in the Central GOA rockfish fishery. Halibut mortality rates in the Central GOA RPP and RP have decreased about 90 percent in the CV sector when compared to 2003 through 2006 levels. Halibut mortality rates before the RPP ranged from 1.5 to 3.0 kilograms (kg) of halibut per mt of total groundfish basis species. After the RPP was implemented, the rates decreased and for the last 3 years are about 0.1 kg of halibut per mt of total groundfish basis species each year. The CP sector also realized reductions in amounts and rates. The CP rate was about 0.2 kg of halibut PSC per mt of total groundfish basis species in 2023 and 2024, or less than half the rate prior to the RPP.

It is difficult to quantify increases in groundfish deliveries associated with the additional halibut PSC availability because of less halibut usage in the RP. Generating those estimates would require many assumptions that may or may not hold. However, the RPP and RP have used less than half of their allocation, and up to 55 percent of the unused amount may be rolled over for use in other fisheries. In 2016, for example, the non-RP GOA trawl fisheries closed on October 22 because the halibut PSC limit was reached. That year, about 65 mt of halibut PSC rolled over from the RP for use in any GOA trawl fishery. In 2024, the deep-water complex used 48 percent of its annual halibut limit, and the shallow-water complex used 6 percent of its limit. Given when the RP roll-overs occur and the non-RP fisheries being under their limit, roll-overs from the RP may have had limited impacts on harvesting more groundfish. Other economic conditions in the fisheries contributed to the available TAC not being fully harvested.

Chinook salmon bycatch amounts remain variable from year-to-year. Industry members have attempted to reduce Chinook salmon bycatch by modifying gear, improving communication within the cooperatives, and avoiding areas with high bycatch rates. The variability of bycatch rates between tows in an area has hampered the fleet's ability to consistently reduce bycatch. Basket sampling methods to estimate total number of Chinook salmon caught in a tow are also thought to inflate the official bycatch estimates in some years (e.g., 2007) and may reduce it in other years.

Since the RP was implemented all CP LLP licenses with QS have been assigned to a cooperative by their owners. The increased participation is due to reducing the number of LLP licenses required to form a cooperative and the elimination of the limited entry fishery. Creating incentives to join cooperatives has reduced the management burden associated with Central GOA trawl limited access fisheries.

The Central GOA rockfish fisheries are a relatively small component of the fleet's annual fishing cycle. Individual allocations are monitored by the cooperatives. The cooperatives and their members can match fishing power to the amount of RP quota available. However, the limited access fisheries that the vessels participate in may create incentives to increase overall harvesting capacity, but those incentives are external to the RP. The success of the cooperative structure has also stimulated voluntary cooperatives to be formed in the Central GOA pollock fishery some years, but those agreements are difficult to reach and maintain and are most likely to form when the harvesting capacity of the fleet would not allow a 24-hour opening without exceeding the TAC. Industry representatives from the Central GOA have noted continual frustration with the management of those fisheries and continue to work to develop more durable voluntary or regulatory cooperative programs.

The Central GOA rockfish fishery has changed from an approximate 3-week race-for-fish season starting at the beginning of July, to a fishery that primarily occurred in May and June, with smaller harvest amounts occurring until November. The recent change to the fishery start date is expected to result in harvests starting in April to fill down times that used to be filled by flatfish fisheries. The reduced conflicts with summer salmon fisheries provided the opportunity to more efficiently time deliveries, reducing offload times and increasing the quality of fish delivered.

Consolidation has not occurred as a direct result of the RP. Ownership and use caps are imposed to limit the consolidation of QS and CQ. The caps were developed to balance the goals of improving economic efficiency by allowing entities to take advantage of relative economies of scale, maintain employment opportunities for vessel crew, and provide financially affordable access opportunities for new participants. However, the number of vessels, processors, and crew that participate in the RP has declined, primarily due to economic conditions outside the control of the RP.

LLP license transfers do not appear to have occurred at a greater rate under the RPP or RP relative to the limited access years (Figure 12-1 and Figure 12-3). Processing plant closures and sales have increased in the GOA (including Kodiak). The instability of the processing sector in Kodiak remains a concern for the RP participants as well as harvesters in other trawl and fixed gear groundfish fisheries (Section 12.3).

The RP includes several community protection features designed to provide for the sustained participation of Kodiak, the fishing community historically most closely associated with the Central GOA rockfish fishery. As measured by multiple indices, the level of Kodiak's engagement in and dependence on the fishery has increased under the RP. While not all participants in all sectors have benefitted equally from the changes between the RPP and the RP, no RP-related adverse community-level impacts have been identified that would put the sustained participation of Kodiak or any other community substantially engaged in and/or dependent upon the fishery at risk.

A trend toward greater use of pelagic gear that started in the period leading up to implementation of the program has continued under the RPP and RP. There are two relevant gear alterations that have led to less bottom contact since 2003. First, a move towards semi-pelagic bottom trawl gear (doors off bottom) since about 2008 decreased the bottom contact from the heaviest portion of the gear. In 2014, mandatory sweep modifications for flatfish trawls were implemented that raise the majority of the trawl off the bottom have been used in other fisheries as well, as sweeps are difficult to replace for specific target species trips. The Fisheries Effects model was used to quantify habitat impacts. The model shows that the percentage of habitat disturbance is less than 5 percent and is steady or declining for all three species. Habitat reduction tends to be less than 1 percent in most areas, but the highest habitat reduction levels focus on the same general areas for all species.

The RP provides the opportunity to deliver higher quality products at both the ex-vessel and first wholesale level. However, world market conditions for rockfish and their substitutes and currency exchange rates have a substantial impact on buyers of rockfish products. The stronger US dollar in recent years has made substitute products from other countries less costly, relative to rockfish, which tends to destabilize markets for rockfish and other fish caught in the US.

The opportunity for shoreside deliveries of rockfish have increased because Central GOA Pacific ocean perch TAC has increased, discards of rockfish species have declined, the rockfish fishery has not closed because of halibut PSC limits being reached, and regulations allow CQ from the CP sector to be leased to CV cooperatives (but do not allow CV CQ to be transferred to the CP sector). Together these factors allow for increased shoreside deliveries of rockfish.

The RPP trawl entry-level fishery was eliminated under the RP and participants were allowed to apply for QS based on the number of years they participated in the trawl entry-level fishery from 2007 through 2009. Three LLP licenses that fished with trawl gear in the entry-level fishery were granted QS in the RP.

The longline entry-level fishery allocation formula was changed from 2.5 percent of the Central GOA primary rockfish species TACs under the RPP to a fixed amount that is adjusted based on whether the sector harvests 90 percent or more of their allocation in the previous year. Increases in catch of dusky rockfish by vessels using jig gear in 2016 resulted in the first increase in the entry-level longline allocation under the RP. The entry-level longline allocation is currently well under the maximum allocation limit that is set as a percentage of the TAC and catches have been low, resulting in the allocations not being increased in recent years.

1 Introduction

This document serves as the required program review that meets the requirements of Section 303A(c)(1)(G) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Program reviews are required a minimum of every seven years after an initial five-year review for all Limited Access Privilege Programs (LAPP). LAPPs are a type of Catch Share Program (CSP). This document also serves as the allocation review required under National Oceanic and Atmospheric Administration (NOAA) Fisheries[2] Allocation Policy Directive 01-119 established in 2016 and two associated Procedural Directives.[3]

1.1 Policy Guidance for Conducting Catch Share Program Reviews

NMFS policy guidance describes the information that should be included in CSP reviews.[4] Based on that guidance, CSP reviews should contain the following eight elements. If an element is determined not applicable for a specific review, the Council should document in its final plan for the review its rationale for not conducting a more formalized analysis of that element. The eight elements are:

1. purpose and need of the review,
2. goals and objectives of the program, the Fishery Management Plan (FMP), and the MSA,
3. history of management, including a description of management prior to the program's implementation, a description of the program at the time of implementation (including enforcement, data collection, and monitoring), and any changes made since the program's implementation or the previous review (including an explanation of why those changes were made),
4. a description of biological, ecological/environmental, economic, social, and administrative environments before and since the program's implementation,
5. an analysis of the program's biological, ecological/environmental, economic, social, and administrative effects,
6. an evaluation of those effects with respect to meeting the goals and objectives (i.e., program performance), including a summary of the conclusions arising from the evaluation,
7. a summary of any unexpected effects (positive or negative) which do not fall under the program's goals and objectives,
8. identification of issues associated with the program's structure or function and the potential need for additional data collection and/or research.

Along with the eight elements, NMFS Policy guidance indicates the review should contain an assessment of the program's effects on net benefits to the Nation, including net benefits that are not exclusively economic in nature. It is worth noting that changes in employment and tax revenues are not economic benefits within a cost-benefit analysis. The latter is a transfer of money within the economy and the former is an example of an economic impact. Both these issues are important to policy makers, stakeholders, and the public and are considered as part of this Central Gulf of Alaska RP (RP) review.

[2] NOAA Fisheries is also commonly known as the National Marine Fisheries Service (NMFS).

[3] https://meetings.npfmc.org/CommentReview/DownloadFile?p=d8187f71-2494-4ba9-9bd7-28677715c094.pdf&fileName=D3%20Allocation%20Review%20Triggers%20discussion%20paper.pdf

[4] https://media.fisheries.noaa.gov/dam-migration/01-121-01.pdf

However, available information does not allow the formal calculation of net benefits to the Nation. The data and discussion provided in this document does suggest that net National benefits are greater under the RP that would have been realized without the RP in most years.

Unlike the forward-looking analytical documents that are required to implement regulatory or plan amendments, the CSP reviews are retrospective to describe how the program has met its original (and current - as the program matures) goals and objectives. Because of this difference, CSP reviews compare the fishery before implementation against what has occurred under the program versus comparing the No Action alternative to the expected future program under the proposed FMP or regulatory amendment alternatives, as would be done in an Environmental Assessment/Regulatory Impact Review (EA/RIR). After considering the information presented in a CSP review, the North Pacific Fishery Management Council (NPFMC or Council) may determine whether modifications to the RP should be considered. Those program modifications would be analyzed using the standard forward-looking analytical document development process.

The RP and the CSP reviews include consideration of general quantitative measures, based on catch, gross revenue, and participation data. It also addresses how well the program has met the Council's program goals as stated in its problem statement.

2 History of the Central Gulf of Alaska Rockfish Fishery Management

This section provides a brief description of the management of the Central Gulf of Alaska (GOA) rockfish fishery management, including the years prior to implementation of the Rockfish Pilot Program (RPP or Pilot Program). Every change to the management of the fishery was accompanied by a regulatory analysis that provided background information and impacts of the proposed changes. The information in all those documents is incorporated in this analysis by reference. Links to those documents are provided in Table 2-1.

Table 2-1 Central GOA Rockfish fishery analytical documents incorporated by reference.

Document	Links
EA/RIR for Amendment 68 RPP August 2006	https://repository.library.noaa.gov/view/noaa/19133
RPP Program Review May 2008	http://www.fakr.noaa.gov/npfmc/catch-shares-allocation/goa-rockfish-program.html
EA/RIR for Amendment 88 RP October 2011	https://repository.library.noaa.gov/view/noaa/19145
RP Program Review October 2017	https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/Rockfish/RockfishProgramReview1017.pdf
Social Impact Assessment (SIA) for RP Review Oct 2017	https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/Rockfish/CGOA_RockfishReview_SIA1017.pdf
EA/RIR for Amendment 111 for RP @ June 2020	https://repository.library.noaa.gov/view/noaa/27232/noaa_27232_DS1.pdf
SIA for RP Reauthorization February 2020	https://s3.amazonaws.com/media.fisheries.noaa.gov/2020-10/goa-rockfish-fmp-amd111-social-impact-assessment0220.pdf?UYSPH19SwWE50mVkqw7NXlJ_rHbkI4pq=
Amendment 113 RP Modification March 2024	https://www.fisheries.noaa.gov/s3//2024-04/Draft-Environmental-Assessment-Regulatory-Impact-Review.pdf

2.1.1 Before RPP (1996 through 2006)

The Final EA/RIR developed for the RPP provides a detailed summary of the GOA rockfish fishery prior to implementation of the RPP (NPFMC, 2006). Information from that RIR and the RP review (NPFMC, 2017) are summarized to describe the conditions present in the fishery under the RPP.

Before implementation of the RPP the GOA rockfish fisheries opened on January 1st for non-trawl gear participants and the trawl gear fishery opened around July 1st. The trawl opening was generally timed to coincide with the third quarter halibut PSC allocation. It also accommodated the sablefish longline survey and typically coincided with the openings of the Aleutian Islands Pacific ocean perch and Bering Sea flathead sole fisheries to distribute effort among the fisheries.

A single Total Allowable Catch (TAC) was established for both the trawl and non-trawl fisheries, limiting the trawl fishery to the available TAC after the non-trawl fleet had fished from January 1st until the trawl rockfish fishery opened. Limited effort in the longline fishery meant that most of the TAC was harvested by the trawl fleet.

Table 2-2 summarizes trawl openings and closings by species for all gear types in the Central GOA directed rockfish fishery prior to implementation of the RPP. The closings show the general progression of participation in the rockfish fisheries. Most participants targeted Pacific ocean perch first, until the TAC of that species was fully harvested. Pacific ocean perch had a larger biomass and typically were easier to target than the other two primary rockfish species. The Pacific ocean perch season usually was closed to directed fishing after one or two weeks. Once the Pacific ocean perch fishery was closed, vessel operators usually moved on to the Northern rockfish or pelagic shelf rockfish directed fisheries although some vessels moved on to other fisheries either in the Central GOA or in other regulatory areas. The directed fisheries for Northern rockfish and pelagic shelf rockfish typically lasted less than one month, closing before the end of July. In earlier years shown in the table, the fisheries typically closed because the rockfish TACs were harvested. In the later years, deep-water complex halibut PSC limits closed the fisheries.

Table 2-2 Season openings (trawl) and closures (all gear types) of the Central GOA primary rockfish species (1996 – 2006)

			Closures			
Year	Opening for Species	Opening date	Pacific Ocean Perch	Northern Rockfish	Pelagic Shelf Rockfish	Reason
1996	all	1-Jul	11-Jul	20-Jul	none	TAC (POP, Nor)
1996 closure		-	15-Jul			PSC
1997	all (ind. PSR nearshore)	1-Jul	7-Jul	10-Jul	7-Jun	TAC
1997	PSR offshore	1-Jul			15-Jul	TAC
1997 closure	POP	-	19-Jul			PSC
1998	all	1-Jul	6-Jul	14-Jul	19-Jul	TAC
1998 reopen	POP	12-Jul	14-Jul			TAC
1998 closure	POP	-	27-Jul			PSC
1999	all	4-Jul	11-Jul	19-Jul		TAC (POP, Nor)
1999 reopen	POP, Nor	6-Aug	8-Aug	10-Aug		TAC (POP, Nor)
1999 closure		-	3-Sep	3-Sep	3-Sep	PSC
2000	all	4-Jul	15-Jul	26-Jul	26-Jul	TAC (POP, Nor) HAL(PSR)
2001	all	1-Jul	12-Jul	23-Jul	23-Jul	TAC (POP) HAL(Nor,PSR)
2001 reopen	Nor, POP	1-Oct	n/a	21-Oct	21-Oct	HAL
2002	all	30-Jun	8-Jul	21-Jul	21-Jul	TAC
2002 closure		-	5-Aug			HAL
2003	all	29-Jun	8-Jul	31-Jul	29-Jul	TAC
2004	all	4-Jul	12-Jul	25-Jul	25-Jul	TAC (POP) HAL(Nor,PSR)
2004 reopen	PSR, Nor	1-Oct		1-Oct	1-Oct	HAL
2005	all	5-Jul	14-Jul	24-Jul	24-Jul	TAC (POP) HAL(Nor,PSR)
2005 closure	Nor			30-Aug		TAC
2005 reopen	PSR	1-Sep			4-Sep	HAL
2005 reopen	PSR	8-Sep			10-Sep	HAL
2005 reopen	PSR	1-Oct			1-Oct	HAL
2006	all	1-Jul	6-Jul	21-Jul	21-Jul	TAC
2006 closure	POP, Nor		3-Aug	3-Aug		PSC
2006 reopen	PSR	2-Oct			8-Oct	HAL

Source: Fishery opening and closure announcements published by NMFS in the Federal Register
Abbreviations used in table: PSR=pelagic shelf rockfish (dusky), POP=Pacific ocean perch, Nor=Northern rockfish, HAL=halibut PSC limit, PSC=placed on prohibited species catch status, and TAC=total allowable catch was reached.

Fishery managers used a precautionary approach when closing fisheries to ensure the TAC was not exceeded. When sufficient TAC was available after accounting for all catches, managers reopened the fisheries to allow participants to better achieve optimum yield from the fishery.

Until 1998, the Federally managed rockfish fisheries in the Central GOA included nearshore pelagic shelf rockfish (i.e., black and blue rockfish), which are prosecuted primarily in State waters. These species were targeted predominantly with non-trawl gear. In 1997, non-trawl effort in the nearshore pelagic shelf rockfish fishery closed that fishery on June 7th, before the trawl opening. In 1998, the State took over management of the nearshore pelagic shelf rockfish fisheries. Those fisheries are currently prosecuted exclusively in State waters.

2.1.2 Rockfish Pilot Program

In 2003, the U.S. Congress[5] directed the Secretary of Commerce (Secretary) to establish, in consultation with the Council, a RPP for the management of the Pacific ocean perch, Northern rockfish, and pelagic shelf rockfish[6] fisheries (the primary rockfish fisheries) in the Central GOA. Although initially scheduled to sunset after 2 years, the 2007 reauthorization of the MSA extended the program term to 5 years. Under that extension, the RPP was scheduled to sunset after the 2011 season. Without Council action, management of the rockfish fisheries would have reverted to management under the license limitation program (LLP) and other federal regulations that restricted participation.

2.1.2.1 Amendment 68 to the GOA FMP – RPP (2007 through 2011)

The RPP was based on the guidelines to improve resource conservation and economic efficiency by establishing cooperatives that receive exclusive harvest privileges. The four goals of the program were to 1) reduce bycatch and discards, 2) encourage conservation-minded practices, 3) improve product quality and value, and 4) provide stability to the processing labor force.

The RPP allowed catcher processors (CPs) to form their own cooperatives. Catcher vessels (CVs) were allowed to form cooperatives in association with shoreside processors located within the community of Kodiak, Alaska. CV cooperative contracts define the requirements for deliveries to the associated cooperative processor. It is assumed that these contracts required delivery by member CVs to the associated processor except under conditions agreed to by both parties. The cooperative agreements allowed shoreside processors and their associated CVs to time rockfish deliveries, so they did not interfere with directed salmon harvests during the summer months.

The RPP allocated harvest privileges to holders of LLP groundfish licenses with a history of legal Central GOA rockfish landings during the qualifying period. Once RPP Quota Shares (QS) were assigned to a specific LLP license they could not be divided or transferred separately from that LLP license. The LLP license holder was allowed to assign the license and associated QS for use in a rockfish cooperative, limited access fishery, or opt-out the fishery. After the LLP license holder assigned the LLP license to a cooperative and the cooperative application was submitted to NMFS, NMFS would allocate each cooperative an amount of cooperative quota (CQ) that was generated by the QS assigned to the cooperative.

[5] Consolidated Appropriations Act of 2004 (Public Law 108-199; Section 802)

[6] Pelagic shelf rockfish included dusky rockfish, dark rockfish, yellowtail rockfish, and widow rockfish. Yellowtail, dark, and widow rockfish make up a very small proportion of the biomass and starting in 2012 a separate TAC was set for dusky rockfish. After the change to the pelagic shelf rockfish complex was implemented, dusky rockfish was then allocated as a primary species in the RP and replacing the pelagic shelf rockfish category.

Vessels were allocated a portion of the third season halibut PSC limit based on their aggregate use of halibut PSC during the qualifying years. The specific allocation method used by NMFS was described in the proposed rule for the RPP.[7]

RPP cooperatives were allowed to transfer all or part of their annual CQ allocation to other rockfish cooperatives within their sector. These transfers between cooperatives required NMFS approval. Transfers of CQ are allowed within a calendar year. Post-delivery transfers were allowed between cooperatives so CQ holdings could be adjusted to account for harvest overages. At the end of the calendar year a cooperative could not have a negative balance of CQ for any species or it would be in violation of the regulations governing the program. All post-delivery transfers had to be completed by December 31 of the year fishing occurred.

The RPP provided an opportunity for a person not in a rockfish cooperative, but who holds an LLP license with QS, to fish in their sector's limited access fishery. The person assigning their LLP license to that fishery was not granted a specific amount of fish to harvest and had to compete with all eligible harvesters for TAC assigned to that fishery.

Section 802 specifically provided for "a set-aside of up to 5 percent for the total allowable catch of such fisheries for CVs not eligible to participate in the RPP." Entry-level fisheries were established for both trawl and longline harvests of Central GOA rockfish. After deducting the incidental catch allowance (ICA) from the TAC, 5 percent of the primary rockfish species was set aside for the entry-level fishery. Each gear type was allocated 2.5 percent of the available amount of the aggregate primary species. Northern rockfish and pelagic shelf (dusky) rockfish in the entry-level fishery were available for catch with longline gear. Trawl gear vessels were given access to the Pacific ocean perch set-aside minus the amount needed for the longline fishery to have 2.5 percent of the primary species aggregate total. The longline sector set-aside was available for use on January 1 and the trawl set-aside May 1. Trawl participants were permitted to harvest any residual longline allocation after September 1. This was accomplished by allowing both sectors to fish off the combined remaining TACs beginning on September 1.

The RPP required processors to meet eligibility requirements to take delivery of any primary or secondary species harvested by a rockfish cooperative, or in a limited access fishery. Processors not meeting these eligibility requirements could receive only primary rockfish harvested from the Central GOA under the entry-level fishery. A shoreside processor or stationary floating processor must have received at least 250 metric tons (mt) in round weight equivalent of legally landed primary rockfish species each calendar year in any four of the five calendar years from 1996 through 2000 during the directed fishing season to qualify. The eligibility criteria for processors gave them an exclusive privilege to receive and process primary rockfish species and secondary species allocated to LLP licenses assigned to their cooperative.

Processors were limited in their ability to process catch outside the communities in which they have traditionally processed primary rockfish species and associated secondary species. This limitation was imposed to help protect the community of Kodiak from adverse impacts of a CSP that could increase flexibility of where catch was landed and processed.

CP LLP license holders were allowed to opt–out of the RPP, with certain limitations (e.g., sideboard limits). Any amount that would have been allocated to cooperatives by LLP license holders that opted-out would be redistributed among CP sector participants in rockfish cooperatives and the limited access fishery.

The RPP established sideboard limits restricting LLP license holders with qualifying catch history from increasing harvests in specific fisheries outside the Central GOA rockfish fisheries. A more complete

[7] https://www.federalregister.gov/documents/2006/06/07/06-5104/fisheries-of-the-exclusive-economic-zone-off-alaska-allocating-gulf-of-alaska-fishery-resources

discussion of sideboard limits in both the RPP and RP was presented in Section 14 of the previous RP review (NPFMC, 2017). Sideboard limits were included as part of the program because it was understood that the cooperative structure would provide economic advantages to harvesters. Harvesters could use these economic advantages to increase their participation in other fisheries, potentially adversely affecting the participants in those fisheries.

The RPP also established monitoring and enforcement provisions to ensure that harvesters maintain catches within annual allocations and do not exceed sideboard limits. Provisions included, but were not limited to, increased observer coverage levels, new reporting requirements, and requirements to check in and out of cooperatives.

The RPP limited access fishery was supported by the third season trawl deep-water halibut PSC limit. No PSC limit was set for Chinook salmon as part of the RPP or the limited access fishery, in part because there was no GOA Chinook salmon PSC limit established for non-pollock fisheries when the program was in place.

2.1.3 Amendment 88 – RP (2012 through 2021)

The RP was authorized for 10 years from January 1, 2012, until December 31, 2021.[8] Given that the Council only approved the RP for 10-years, it had to be renewed at the end of that period or the program would expire.

The Council's RP problem statement provided below:

> *"The intent of this action is to retain the conservation, management, safety, and economic gains created by the Rockfish Pilot Program to the extent practicable, while also considering the goals and limitations of the Magnuson-Stevens Fisheries Conservation and Management Act Limited Access Privilege Program (LAPP) provisions.*
>
> *The existing Central GOA Rockfish Pilot Program (RPP) will sunset after 2011. Consequently, if the management, economic, safety, and conservation gains enjoyed under the RPP are to be continued, the Council must act to create a long-term Central GOA rockfish LAPP. For both the onshore and offshore sectors, the RPP has improved safety at sea, controlled capacity of the fleets, improved NMFS' ability to conserve and manage the species in the program, increased vessel accountability, reduced sea floor contact, allowed full retention of allocated species and reduced halibut bycatch. In addition, the rockfish fishery dependent community in the Central GOA and the shorebased processing sector have benefited from stabilization of the work force, more shoreside deliveries of rockfish, additional non-rockfish deliveries with the RPP halibut savings, and increased rockfish quality and diversity of rockfish products. Moreover, the Central GOA fishermen, and the shorebased processing sector have benefited from the removal of processing conflicts with GOA salmon production. The Council needs to resolve identified issues in the management and viability of the entry-level fishery.*
>
> *The portion of the CP sector currently participating in the rockfish cooperatives has also benefitted from the RPP. These benefits include greater spatial and temporal flexibility in prosecuting the fishery, which result in lower bycatch, a more rational distribution of effort, and more stable markets. Certain provisions of the current RPP act as disincentives to some CP operators from joining the cooperative sector and achieving these benefits. These disincentives should be eliminated to the extent practicable in the new RPP."*

[8] Amendment 88 to the GOA Fishery Management Plan (76 FR 81247).

2.1.3.1 Elements of the RP that are the same as the RPP

The Council designed the RP to meet the requirements for LAPPs in section 303A of the MSA. The RP includes multiple implementation, management, monitoring, and enforcement measures similar to those developed under the RPP. Specifically, the RP (1) continues to assign QS and CQ to participants for primary and secondary species, (2) allows a participant holding an LLP license with rockfish QS to participate in forming a rockfish cooperative, (3) allows holders of CP LLP licenses to opt-out of rockfish cooperatives for a given year, (4) includes an entry-level longline fishery, (5) establishes sideboard limits, and (6) includes additional monitoring and enforcement provisions beyond those required under management of the LLP.

2.1.3.2 Changes from RPP to the RP

Changes were made from the RPP to improve the functionality of the RP. Key differences between the RPP and the existing RP are described below as well as presented in the final rule for GOA Amendment 88 (76 FR 81247).

Change the qualifying years for QS eligibility and allocation. For the RPP, eligibility to receive QS of primary and secondary species was based on targeted legal qualifying landings made during the years 1996 through 2002. A person's primary species allocation was based on the best 5 of 7 years of landings during the eligibility period. The RP QS qualification was based on targeted legal landings during the years 2000 through 2006 or fishing in the entry-level fishery during 2007, 2008, or 2009. The allocation of QS was based on the best 5 of 7 years from 2000 through 2006, or the number of years fished during the qualifying period for entry-level fishery participants that did not qualify for QS based on history from 2000 through 2006.

The percentages of the primary species Central GOA TACs that were assigned to cooperatives under the RPP and RP vary. The changes are due to the amount of the ICA, which has varied over the years the program has been in place, and the entry-level fishery set-asides. The entry-level set-aside for the trawl fishery was removed under the RP. The longline set-aside is allowed to increase up to a set level if they harvest 90 percent of their allocation the previous year. The formulas used to calculate the amount of the TAC assigned to cooperatives under the two programs are presented below:

RPP Allocation = TAC – ICA – Trawl Entry-level Fishery – Longline Entry-level Fishery
RP Allocation = TAC – ICA – Longline Entry-level Fishery.

Assign primary and secondary species to rockfish cooperatives. Primary species QS is allocated to cooperatives based on the members' QS. NMFS does not issue separate QS to an LLP license for the rockfish secondary species or halibut PSC under the RP, nor did NMFS under the RPP. The amount of those species allocated to a cooperative is based on the amount of primary species QS. Under the RPP Pacific cod, sablefish, and thornyhead rockfish were allocated to cooperatives based on QS assigned to LLP license during the qualifying years. Shortraker/rougheye were allocated as a maximum retainable amount (MRA) that could not exceed 9.72 percent of the TAC. Pacific cod, trawl sablefish, and thornyhead rockfish are CV secondary species assigned to cooperatives under the RP based on the percentage of the TAC assigned to the RP and the percentage of the QS assigned to a person's LLP license. Shortraker and rougheye rockfish are managed under an MRA. Chinook salmon PSC limits are not assigned to cooperatives. Instead, the limit is established for the entire sector.

The RPP and RPs managed CP Pacific cod using an MRA that is based on historic harvest rates. An MRA provided the fleet greater flexibility than a fixed allocation. CPs were also reported to have markets for rougheye and shortraker rockfish and as a sector retain a greater proportion of those species than CVs. As a result, the CP sector was allocated a percentage of the TAC for those species. CPs were reported to have harvested 43.2 percent of the Central GOA TAC of shortraker rockfish using 2000 through 2006 qualifying years. The RP slightly reduced the percentage of the TAC to 40 percent of the Central GOA

TAC to provide slightly more harvest opportunities for vessels in the CV sector and non-RP participants. Concern was expressed that without the slight reduction catches by RP CVs and non-RP fisheries could need to be constrained to prevent overharvest of the shortraker rockfish TAC. The MRA percentages recommended for the CV sector for shortraker and rougheye rockfish provide some flexibility for the harvesters in these sectors yet maintain harvests within historic levels.

The RPP allocation of 58.87 percent of Central GOA TAC for rougheye rockfish was retained under the RP, which was greater than the 34.3 percent of the rougheye rockfish catch retained by eligible CP LLP licenses from 2000 through 2006. Retaining the limit prevented unnecessary constraints on the CP cooperatives while targeting primary species.

Modify halibut PSC limits to cooperatives and create a conservation set aside that will remain unallocated. The halibut PSC limits for the RP were modified to balance the need to provide adequate halibut PSC for use by rockfish cooperatives while recognizing LAPPs could reduce halibut PSC use. From 2000 through 2006, average halibut PSC mortality averaged 84.7mt in the CP sector, and 134.1 mt in the CV sector. The RP created a 74.1 mt halibut PSC limit for the CP sector and a 117.3 mt halibut PSC limit for the CV sector. Those amounts represent a 12.5 percent reduction from the amount of halibut mortality associated with each sector during the 2000 through 2006 qualifying period, which was prior to the LAPP being implemented. The remaining 27.4 mt (16.8 mt from the CV sector and 10.6 mt from the CP sector) that would otherwise have been allocated is not available for use by any trawl or fixed gear fishery and remains "in the water" to contribute to the halibut biomass. Like under the RPP, halibut PSC limits are assigned to cooperatives based on the primary species QS attached to the LLP license.

Sideboard limits (in effect July 1 through July 31). CVs that were subject to American Fisheries Act (AFA) sideboard limits were exempted under the RPP. That same exemption carried over into the RP, but sideboard exemptions were applied to vessels that were voluntarily excluded from the RP and vessels assigned an LLP license that was excluded from the RP. CVs that were subject to crab program sideboard limits did not receive that exemption when the RPP or RP was implemented.

Under the RPP, CVs were prohibited from fishing in specific Bering Sea/Aleutian Islands (BSAI) groundfish fisheries, rockfish in the West Yakutat and Western GOA areas, and deep and shallow-water complex halibut that was not set-aside for use in the RPP. The RP modified those sideboard limits to include just the primary rockfish species in the West Yakutat and Western GOA areas and just the non-rockfish deep-water complex species (arrowtooth flounder, deep-water flatfish, and rex sole) that are harvested using the deep-water halibut PSC limit.

CPs were prohibited from fishing in the BSAI groundfish fisheries and the non-RPP groundfish fisheries in the GOA. Those vessels were also prohibited from fishing species using halibut PSC in the deep and shallow-water complexes outside the RPP PSC limit. The RP maintained the prohibition on fishing species that would use halibut PSC in the deep and shallow-water complexes outside the RPP PSC limit. However, the groundfish fishing restrictions were limited to primary rockfish species in the West Yakutat and Western GOA areas for Amendment 80 CPs. Non-Amendment 80 CPs were prohibited from fishing for primary rockfish species in those areas.

Restrict the entry-level fishery to longline gear only. The entry-level fishery for trawl vessels was eliminated under the RP partially due to difficulty managing the small allocation. Trawl vessels that took advantage of the entry-level fishery during 2007, 2008, or 2009 were allocated QS.

The entry-level fishery continues for harvesters who wish to fish for RP primary species using longline gear.[9] Any vessel that may legally fish with one of those gear types may fish in the entry-level longline

[9] Longline gear includes hook-and-line, jig, troll, and handline gear types.

fishery. The start date for the entry-level longline fishery is January 1 of each year. Participants are not required to apply annually. The vessel operators were required to apply annually under the RPP.

The initial allocation to the entry-level longline fishery was smaller than under the RPP. Under the RPP, longline harvests never exceeded one percent of the TAC for any of the target species during the qualifying years. The RPP amount was based on 2.5 percent of the primary species TACs. The RP allocates a fixed amount of each species annually. Until 2017, the annual longline limit was 5 mt of Pacific ocean perch, 5 mt of Northern rockfish, and 30 mt of dusky/pelagic shelf rockfish. If the entry-level fishery vessels harvest greater than or equal to 90 percent of a species NMFS increases the next year's allocation by 5 mt for Pacific ocean perch, 5 mt for Northern rockfish, or 20 mt for dusky rockfish.

Allocations to the limited entry fishery are limited to 1 percent of the Pacific ocean perch TAC, 2 percent of the Northern rockfish TAC, or 5 percent of the dusky rockfish TAC. Because greater than or equal to 90 percent of dusky limit was harvested in 2016, the entry-level fishery limit for that species was increased to 50 mt in 2017 and has remained at that level.

The final rule for the RP stated that unlike CVs fishing in cooperatives, participants in the entry-level longline fishery may deliver their harvest to any shoreside processing facility in any community and are not restricted to delivery to a Kodiak processor. Requirements to deliver within the boundaries of the City of Kodiak were thought to potentially discourage participants from attempting to develop the entry-level longline fishery. Requiring entry-level participants to comply with a landing requirement within the boundaries of the City of Kodiak might present too great of an expense for the participants located around other Central GOA ports and expose those participants, who typically fish with smaller vessels, to unacceptable safety risks.

Cooperative formation requirements. The RP relaxed cooperative formation requirements to balance encouraging cooperative formation and providing flexibility for LLP license holders to form cooperatives with persons of their choice. To achieve these objectives the minimum number of LLP licenses with affixed rockfish QS required to form a cooperative was eliminated. However, CQ could only be transferred to a cooperative with a minimum of two LLP licenses. There was no requirement that the LLP licenses are held by different persons. These changes were implemented to encourage cooperative formation by providing greater flexibility to transfer CQ to meet operational demands. The RP also modified the RPP so that LLP license holders with rockfish QS designated for the CV sector could form a cooperative only with the processor to whom most of their catch was delivered during 1996 through 2000. The Council modified this requirement because the specific requirement and authority provided in Section 802 expired with the RPP, and the Council determined their program goals could be achieved without that provision.

Kodiak delivery requirement. To address concerns raised by processors that the RP would provide harvesters an undue competitive advantage and that they could use that potential advantage to deliver outside of the traditional landing port of Kodiak, the RP included a requirement that all primary and rockfish secondary species CQ in the CV sector be delivered to a shoreside processor within the City of Kodiak. In addition to protecting traditional processors, the requirement is intended to protect the fishing community of Kodiak. During the 2000 through 2006 period, all catch landed shoreside was delivered within Kodiak.

Harvesters in RP CV cooperatives are not required to deliver to a specific processor. The RPP permitted CVs to form a cooperative only with the processor to which the CV made most of their deliveries during 1996 through 2000. The RP modified the requirement to allow CVs to annually join the Kodiak-based cooperative of their choice, regardless of where they had delivered rockfish in the past. This provision was modified because the specific requirement and authority provided by Congress to create that linkage in Section 802 expired with the RPP and NOAA GC has determined that the MSA does not provide that authority.

During the development of the RP, the Council reviewed and considered a range of other options to address concerns raised by shoreside processors. Management measures considered included the linkage between shoreside processors and CV cooperatives required under the RPP, allocations of harvest shares to processors, annual cooperative/processor linkages (which may be changed, without penalty or forfeiture), and caps on the amount of landings that may be processed by any single processor. Ultimately, the Council chose to recommend a landing requirement within the City of Kodiak and processing caps to preserve flexibility for harvesters to deliver to multiple markets. The Council's recommendation sought to maintain the traditional shoreside processing activity within Kodiak and limit the consolidation of processing effort among rockfish processors that was thought to potentially have detrimental impacts on harvesters and processors traditionally active in the fishery.

During development of the RP, the Council determined that harvester/processor linkages and allocation of harvesting quota to processors was not necessary or appropriate to meet the overall goals it established for the RP. Harvesters and processors were thought to be able to coordinate/cooperate as they did under the RPP. Maintaining those relationships would continue to reduce processing capacity conflicts with the salmon fishery that is active during summer months and provide a stable processing workforce by ensuring rockfish deliveries during May and June when other GOA fisheries are less active.

During development of the RP, it was assumed the program's structure would benefit processors since each cooperative is required to associate with a processor on an annual basis. That limited duration association would make it possible to define delivery arrangements. While those arrangements may limit where CVs may deliver their RP catch during the year, they would only continue to associate with that processor the next year if there are advantages to the cooperative members. Depending on the agreements reached by cooperative members, processors could develop markets and products to maintain annual associations.

Historical relationships between harvesters and processors are expected to influence the formation of cooperative/processor associations. Since the RP deliveries are a relatively small component of the annual GOA deliveries for many CVs, it will be important for those vessel operators to maintain a strong working relationship with their processor for other species (i.e., pollock, Pacific cod, and flatfish). These relationships are likely to be tested if a processor fails to offer a competitive price.

Processors were thought to have an incentive to vertically integrate, if needed to secure a stable supply of landings in the rockfish fisheries. Vertical integration is limited by the excessive share caps.

Implement a cost recovery program, except for the entry-level longline fishery. The RP is established under the provisions of Section 303A of the MSA. Section 303A requires that NMFS collect fees for LAPPs to recover the actual costs directly related to the management, data collection and analysis, and enforcement activities. NMFS uses a portion of the cost recovery fees collected under the RP to hire personnel to monitor rockfish landings. The rockfish catch monitoring and control plan (CMCP) specialist will monitor program deliveries to ensure compliance with the CMCP by any processor receiving CQ landings, assist processors with rockfish species identification to ensure accurate catch sorting and quota accounting, and report the findings to NMFS. Section 304(d)(2) of the MSA also limits the cost recovery fee so that it may not exceed 3 percent of the ex-vessel value of the fish harvested using CQ issued under the RP. NMFS assesses fees on the ex-vessel value of rockfish primary species and rockfish secondary species CQ harvested by rockfish cooperatives in the Central GOA when rockfish primary species caught by that vessel are deducted from the Federal TAC. The cost recovery fees will not apply to the entry-level longline fishery and opt-out vessels because those participants do not receive rockfish CQ.

NMFS determines the fee percentage that applies to landings made in the previous year by dividing the total RP management, data collection and analysis, and enforcement costs (direct program costs) during the previous year by the total standard ex-vessel value of the rockfish primary species and RP secondary species for all CQ landings made during the previous year (fishery value). NMFS captures the direct

program costs through an established accounting system that allows staff to track labor, travel, contracts, rent, and procurement. Using the fee percentage formula described above, the estimated percentage of program costs to value for the 2016 calendar year is 2.54 percent of the standard ex-vessel value. The fee percentage for 2016 is a decrease from the 2015 and 2014 fee percentage of 3.0 percent (81 FR 10591, March 1, 2016). The 2013 fee of 2.5 percent was about the same as the 2016 fee percentage. The fee percentage was the lowest (1.4 percent) in 2012. Program costs for 2016 were lower than in 2015, in part because of reduced costs associated with observer coverage because of efficiencies achieved in the deployment of observers in the RP.

Establish a CMCP specialist. A shoreside processor receiving RP rockfish must be a facility operating under an approved CMCP. The CMCP describes how landings can be monitored effectively by one individual, how scales will be tested and used, and ensures that adequate equipment/facilities are made available for individuals authorized by NMFS. NMFS uses a portion of the cost recovery fees to fund the CMCP specialist positions.

The CMCP specialist monitors rockfish landings to provide impartial verification of a processor's adherence to its CMCP. The duties of the rockfish CMCP specialist do not overlap with those of the fishery observer. The rockfish CMCP specialist monitors program deliveries and has not been trained as an observer or requested to complete observer duties such as verifying non-rockfish fish tickets, assisting vessel observers, or collecting biological or other scientific data. The duties of the rockfish CMCP specialist are to monitor rockfish deliveries to ensure compliance with the CMCP of any processor receiving program landings, assist processors with rockfish species identification to ensure accurate catch sorting and quota accounting and report the findings to NMFS. A shoreside processor is required to include a description in the CMCP of how the CMCP specialist would be notified of rockfish CQ deliveries. The CMCP specialist establishes a monitoring schedule so that all or most deliveries are monitored. In the event of conflicting deliveries, the CMCP specialist determines which program deliveries will be monitored.

Program Element	RPP 2007-2011	RP 2012-Currrent
Management Structure	Cooperatives, Entry-level Trawl Fishery, and Entry-level Longline Fishery	Cooperatives and Entry-level Longline Fishery. Landings in the RPP Entry-level Trawl Fishery earned RP quota.
Duration	5 years	Initially 10 years but was reauthorized starting in 2022 without a sunset date.
Cooperative	An eligible rockfish harvester may be a member of a rockfish cooperative formed in association with a rockfish processor to which the harvester made a majority of landings assigned to that LLP license during the processor qualifying period.	Persons holding rockfish QS in the CV sector may only form a cooperative with other persons holding rockfish QS in that same sector. Each CV cooperative must form an association with a shoreside processor located within the geographic boundaries of the City of Kodiak. CPs may form a cooperative or cooperatives with other eligible CPs.
Species Allocated	Primary Species: Pacific ocean perch, Northern rockfish and pelagic shelf rockfish Secondary Species: Pacific cod, rougheye rockfish, shortraker rockfish, sablefish, and thornyhead rockfish.	Same as RPP except dusky rockfish was allocated instead of pelagic shelf rockfish complex starting in 2012.

Eligibility	LLP license used to make targeted landings primary Central GOA rockfish species during the years 2000 through 2006	Same as RPP or made landings in trawl entry-level fishery in 2007, 2008, 2009.
Season	May 1 through November 15	Was same as RPP until the start date was changed to April 1, under Amendment 113, for the start of the 2025 fishing year
Initial Allocation	Based on primary rockfish landings from 1996 through 2002.	QS is allocated to LLP licenses based on the best 5 of 7 years from 2000-2006. LLP licenses that received an initial allocation under the RP are collectively allocated 97.5% of the allocated TAC. LLP licenses that receive an allocation for participating in the RP entry-level trawl fishery receive 2.5% of the allocated TAC based on their harvest.
Cooperative Formation	Only eligible LLP license holders may join a cooperative. A minimum of 1 LLP license was required to form a CV cooperative in association with a processor and a minimum of 75% of all legal primary rockfish landings that were delivered to that processor during the processor qualifying period. Two LLP licenses were required to form a CP cooperative.	One eligible CV LLP license holder was required to form a CV cooperative in association with an eligible processor. Two CP LLP licenses were required to for a CP cooperative.
Cooperative Quota (CV)	**Rockfish primary species** • Based on member QS assigned to the cooperative. **Rockfish secondary species** • 3.81% of Pacific cod TAC • 6.7% of sablefish TAC • 7.84% of thornyhead rockfish TAC • Rougheye/shortraker rockfish MRA may not exceed 9.72% of TAC **Halibut PSC** • Based on member QS. • Calculation based on 2000–2006 data	**Rockfish primary species** • Based on member QS assigned to the cooperative. **Rockfish secondary species** • 3.81% of Pacific cod TAC • 6.7% of sablefish TAC • 7.84% of thornyhead rockfish TAC • Rougheye/shortraker rockfish MRA may not exceed 9.72% of TAC **Halibut PSC** • Based on member QS. • Calculation based on 2000–2006 data with a 12.5% reduction. • 117.3 mt to cooperatives • 16.8 mt remains unallocated and stays “in the water.”
Cooperative Quota (CP)	**Rockfish primary species** • Amount based on member QS **Rockfish secondary species** • Pacific cod MRA (only) • 3.51% of sablefish TAC • 40% of shortraker rockfish TAC • 58.87% of rougheye rockfish TAC • 26.50% of thornyhead rockfish TAC **Halibut PSC** • Amount based on member QS.	**Rockfish primary species** • Amount based on member QS **Rockfish secondary species** • Pacific cod MRA (only) • 3.51% of sablefish TAC • 40% of shortraker rockfish TAC • 58.87% of rougheye rockfish TAC • 26.50% of thornyhead rockfish TAC **Halibut PSC** • Amount based on member QS.

	• Calculation based on 2000–2006 data	• Calculation based on 2000–2006 data with a 12.5% reduction. • 74.1 mt allocated. • 10.6 mt remains unallocated and stays "in the water".
CQ Transfers Between Cooperatives	CQ may only be transferred within a sector. A minimum of 2 LLP licenses in each cooperative is required for CQ transfers. Post delivery transfers must be completed by December 31. Halibut PSC CQ may not be transferred after November 15th.	
Sideboards CVs (July 1-31)	Prohibited fishing restrictions: • West Yakutat District/Western GOA (rockfish primary species) • GOA Deep-water complex—arrowtooth flounder, deep-water flatfish, rex sole	
Sideboards CP (July 1-31)	West Yakutat/Western GOA limitation (rockfish primary species) • GOA Deep- and shallow-water halibut PSC limit • Prohibited from fishing rockfish primary species in the Western GOA and West Yakutat District for non-Amendment 80 vessels	The Western GOA sideboard limitations were removed when Amendment 111 went into effect on March 1, 2021.
Sideboards CP Opt-Out Vessels (July 1-31)	Prevents directed fishing in GOA groundfish fisheries without previous participation in 2000–2006 • Prohibit directed fishing for rockfish primary species in Western GOA and West Yakutat for non-Amendment 80 vessels	
Processor Qualifications	Required processors to be the holder of processing history from a shoreside processor or stationary floating processor that received a minimum of 250 mt round weight equivalent of legally landed primary rockfish species in 4 of the 5 calendar years from 1996 through 2000 during the directed fishing season.	Must be located within the boundaries of the City of Kodiak, hold a valid FPP, and meet all other requirements of a federal groundfish processor.
Processor Co-op Association	A processor may only be associated with 1 CV RPP/RP cooperative.	
Monitoring	(1) Requires observers aboard vessels that are operating in a rockfish cooperative or a rockfish sideboard fishery to adequately account for catch and bycatch in the fishery. NMFS requires 100 percent observer coverage for CVs when checked-in; 200 percent observer coverage for CPs fishing in sideboard fisheries or under the authority of a rockfish CQ permit; and 100 percent observer coverage for CP opt-out vessels in the month of July only. (2) Requires that vessels participating in a rockfish cooperative, or a rockfish sideboard fishery carry and use a NMFS-approved vessel monitoring system transmitter, (3) Requires that CPs in a rockfish cooperative or rockfish sideboard fishery follow specified catch handling procedures prior to processing,	In addition to the RPP requirements, the RP added a requirement that shoreside processors receiving rockfish CQ operate under a NMFS-approved CMCP. A CMCP specialist monitors rockfish deliveries to ensure compliance with the CMCP of any processor receiving program landings and assists processors with rockfish species identification to ensure accurate catch sorting and quota accounting. Shoreside processors are not required to be operating under an approved CMCP to receive groundfish harvested in the entry-level longline fishery. Note that as discussed under Section 16.1, NMFS and industry are currently testing Electronic Monitoring in the Rockfish Program.

	(4) Requires the weighing of all catch from rockfish cooperatives on NMFS- or state-approved scales.	
Person Use Caps	A person[10] may not hold or use more than: • 4% of the QS assigned to the CV sector. • 40% of the QS assigned to the CP sector.	
CV Cooperative Use Caps	CV cooperative may not hold or use more CQ than: • 30% QS assigned to the CV sector.	Cooperative use caps were removed. Effective date September 16, 2024.
Vessel Use Caps	A vessel may not be used to harvest more than: • 8% CQ issued to the CV sector. • 60% CQ issued to the CP sector.	Same as RPP except for the CVs. Amendment 113, effective date September 16, 2024, changed the calculation of the cap from using aggregate rockfish primary species to just Pacific ocean perch. The action essentially removed dusky rockfish and Northern rockfish from the calculation.
Processor Use Caps	Processors[11] may not receive or process more than: • 30% CQ issued to the CV sector (rockfish primary species, Pacific cod, and sablefish)	Processor use caps were increased to 40%. Effective date September 16, 2024.
Cost Recovery	n/a	RP cooperatives are responsible for paying cost recovery fees. Cost recovery fees are assessed on the ex-vessel value of rockfish primary species and rockfish secondary species CQ harvested by RP cooperatives in the Central GOA and state waters adjacent to the Central GOA when rockfish primary species caught by vessels in the cooperative are deducted from the Federal total allowable catch. The cost recovery fees do not apply to halibut prohibit species catch CQ since that halibut cannot be retained for sale and, therefore, does not have an ex-vessel value. The cost recovery fees do not apply to RP entry-level longline fishery and opt-out vessels because those participants do not receive rockfish CQ.
Entry-level Trawl	After accounting for the ICA, 5% of the remaining primary species TACs was allocated for use in the entry-level fishery.	The allocation was removed
Entry-level Longline		Open from January 1 through November 15. 2012 Initial Allocation was: Pacific ocean perch 5 mt, Northern rockfish 5 mt, and pelagic shelf rockfish 30 mt.

[10] "*Person* [as defined at 50 CFR 679.20] "*means any individual (whether or not a citizen or national of the United States), any corporation, partnership, association, or other non-individual entity (whether or not organized, or existing under the laws of any state), and any Federal, state, local, or foreign government or any entity of any such aforementioned governments*."

[11] Processor use caps are applied at the individual processing plant level (as identified by Federal Processing Permits that are issued to individual plants), not at the processing corporation/ownership level.

		Allocations Increase if ≥ 90% of allocation is harvested up to a maximum % of TAC Pacific ocean perch 1%, northern rockfish 2%, and pelagic shelf rockfish/dusky 5%, The dusky allocation was increased to 50 mt in 2017 has remained at that level through 2024.
Annual Cooperative Report	A required annual rockfish cooperative report from each cooperative included at a minimum: • The rockfish cooperative's CQ, sideboard limit (if applicable), and any rockfish sideboard fishery harvests made by the vessels in the rockfish cooperative on a vessel-by-vessel basis; • The rockfish cooperative's actual retained and discarded catch of CQ and sideboard limit on an area-by-area and vessel-by-vessel basis; • A description of the method used by the rockfish cooperative to monitor fisheries in which rockfish cooperative vessels participated; • A description of any civil actions taken by the rockfish cooperative in response to any members that exceeded their allowed catch.	As of 2022, an annual RP cooperative report no longer needs to be submitted to NMFS. The Council has requested that the RP cooperatives continue to voluntarily provide annual reports to the Council (§ 679.5(r)(6), and § 679.81(i)(3)(xxv) and (xxvi)).

Notes:
1/ Grandfather provisions allowed persons to retain amounts of initial allocations of rockfish QS and resulting CQ in excess of the use caps. Grandfather provisions apply to persons that held QS in excess of the use caps prior to the date of final Council action, June 14, 2010
2/ Each year, holders of CP QS may opt-out of participating in a rockfish cooperative. Participants that choose to "opt-out" forgo the opportunity to fish rockfish primary species.

2.1.4 Amendment 111 - RP Reauthorization

The Council adopted the following problem statement in December 2018 as part of the process to reauthorize the RP to prevent its sunset.

> *The Central Gulf of Alaska Rockfish Program (RP) will sunset on December 31, 2021 and the Council must act if it intends to reauthorize the RP. The purpose of this action is to reauthorize the RP to retain the management, economic, safety, and conservation gains realized under the RP to the extent practicable, consistent with the Magnuson-Stevens Act.*
>
> *For both the onshore and offshore sectors, the RP has improved safety at sea, controlled fleet capacity, enhanced NMFS' ability to conserve and manage species allocated under the RP, increased vessel accountability, reduced sea floor contact, allowed full retention of allocated species, and reduced halibut and Chinook salmon bycatch. In addition, the rockfish fishery dependent communities in the Central Gulf of Alaska and the onshore processing sector have benefited from a more stable workforce, more onshore deliveries of rockfish, improved rockfish quality, and increased diversity of rockfish products. Central Gulf of Alaska fishermen, and the onshore processing sector have benefited from reduced conflicts with salmon processing. The offshore sector has benefited from greater spatial and temporal flexibility in prosecuting the fishery, resulting in lower bycatch, a more rational distribution of effort, and more stable markets.*

The Council must act to continue the management, economic, safety, and conservation gains realized under the RP. Otherwise, fisheries managed under the RP will revert to effort-control management under the License Limitation Program (LLP).

The action under Amendment 111 reauthorized the RP without a sunset date starting with the 2022 fishing year. Removing the sunset date since the last program review should reduce analytical, regulatory, and stakeholder costs and time. Uncertainty over the future management of the fishery and how the rockfish fishery stakeholders operate within the RP should also be reduced. It also addressed several other administrative and management issues within the RP.

- Specifying that only shoreside processors receiving RP CQ must submit the Rockfish Ex-vessel Volume and Value Report, rather than both shoreside processors and CPs;
- Modifying cooperative check-in notice timing into the RP from 48 to 24 hours;
- Removing requirements that an annual RP cooperative report be submitted to NMFS. The Council requested that the RP cooperatives continue to provide annual reports to the Council voluntarily;
- Removing requirements for a fishing plan to be submitted with a cooperative application for CQ;
- Requiring annual NMFS cost recovery reports in regulation;
- Allowing NMFS to reallocate unharvested Pacific cod allocated to RP cooperatives to other non-RP sectors after the RP fisheries close on November 15, consistent with existing inseason management regulatory authorities;
- Allowing NMFS to reallocate unused rockfish ICAs to RP cooperatives;
- Clarifying regulations regarding accounting for inseason use caps to specify that any transfer of unused rockfish ICAs or CP CQ to CV cooperatives does not apply to CV ownership, cooperative, harvester CQ, or shoreside processor CQ use caps;
- Exempting vessels from Crab Rationalization Program sideboard limits when fishing in the RP;
- Removing CP RP sideboard limits in the Western GOA rockfish fisheries;
- Removing the requirement for a trawl CV that has checked into and is participating in the RP fishery to stand down for three days when transiting from the BSAI to the GOA while Pacific cod or pollock is open to directed fishing in the BSAI;
- Removing requirements that shoreside processors under the RP provide an observer workstation and observer communication requirements; and
- Minor technical corrections to clarify the season dates for directed fishing for Pacific cod under the RP and to update references to dusky rockfish (Sebastes variabilis) instead of pelagic shelf rockfish throughout regulations in 50 CFR part 679.

2.1.5 Regulatory Changes Under Amendment 113

Four changes to the RP were implemented[12] under Amendment 113 based on actions proposed after the Council reauthorized the RP under Amendment 111. Those actions were determined to be necessary to provide increased flexibility and efficiency and help ensure the rockfish TAC is fully harvested and subsequently landed in the City of Kodiak.

[12] Amendment 113 was implemented September 2024

The first was to change the season start date from May 1 to April 1 each year. The intent of this change was to provide additional flexibility for trawl vessels to participate in the RP during April and help rockfish processors. The change is anticipated to help maintain processing capacity for other non-trawl fisheries through workforce stability, as was noted during the 2021 season under the emergency rule (86 FR 14851, March 19, 2021) when NMFS temporarily moved the season start date to April 1, 2021. Specifically, the May 1 start date caused problems for processors and vessels because without a flatfish fishery, there is a large gap between the pollock and rockfish fisheries. This gap makes it difficult to maintain sufficient staff at plants and crew on vessels with the extended downtime.

The second amendment removed the 30 percent CV cooperative holding cap that prevented a CV rockfish cooperative from holding or using more than 30 percent of the aggregate rockfish primary species QS initially assigned to the CV sector. Removing this use cap allows cooperatives to reduce the administrative and management costs associated with managing the cooperatives by allowing RP CVs form larger cooperatives. It was determined that the RP's processing use cap provides the intended protection from over-consolidation.

The third action increased the processing caps from 30 percent to 40 percent of the CV QS pool for primary rockfish species, Pacific cod, and sablefish. Increasing the cap ensures that at least three Kodiak shoreside processors would be necessary to process all the RP CQ. This helps to address a concern that seven individual Kodiak rockfish processors participated in the RP from 2012 through 2014, and that number has declined to four in recent years. The decline was the result of several factors in the years since 2014, including plant closures due to various market conditions as well as some consolidation of processing entities. During 2024, four Kodiak plants bought primary RP species, and not all plants bought rockfish during the time of the year when the most deliveries typically occur, resulting in uncertainty for vessels having a market for rockfish CQ deliveries. It also means that if additional processors exit the fishery, the cap could limit processing the entire allocation.

The fourth action revised the harvesting caps for CVs but not CPs. This action changed the calculation of the cap from using aggregate amounts of rockfish primary species to only using Pacific ocean perch for the calculation. The action essentially removed dusky and Northern rockfish when calculating the eight percent harvest vessel use cap. Changing the calculation may allow the CV fleet to more fully utilize the dusky and Northern rockfish TACs, which are consistently underharvested.

2.1.6 Frank LoBiondo Coast Guard Authorization Act of 2018 (Public Law Number: 115-282)

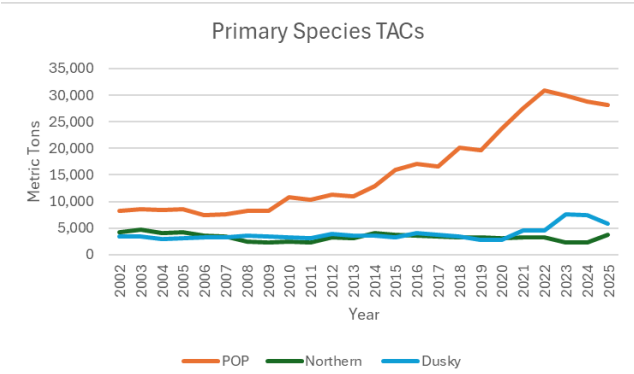
On December 4, 2018, Public Law No: 115-282 was enacted. Section 835 of that law contains a waiver allowing one Amendment 80 vessel to be replaced by a new vessel that would not have otherwise qualified under the Jones Act. While Public Law Number 115-282 allows the new vessel to participate in the U.S. fisheries, Section 836 of the law placed specific temporary limitations on using that vessel.

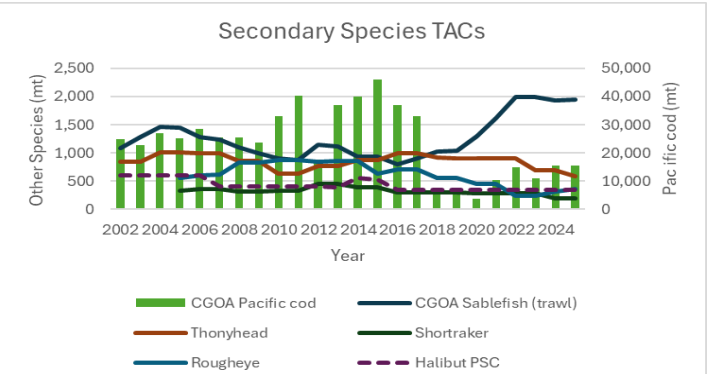
One of the limitations was the amount of GOA groundfish the listed vessels (three CP vessels owned by the same company) may harvest. Specifically, the language in Section 836(a)(1)(A) limits the amounts of groundfish (excluding those allocated under a catch share program or Community Development Program) to their "*harvest from 2012 through 2017 relative to the total allowable catch available to such vessels in the calendar years 2012 through 2017."* The limitations placed on the vessel expired on December 4, 2024. Moving from the vessel limits under Public Law Number 115-282 to the aggregate limit for all vessels combined may impact the distribution of RP CP harvests among firms participating in the West Yakutat and Western GOA fisheries.

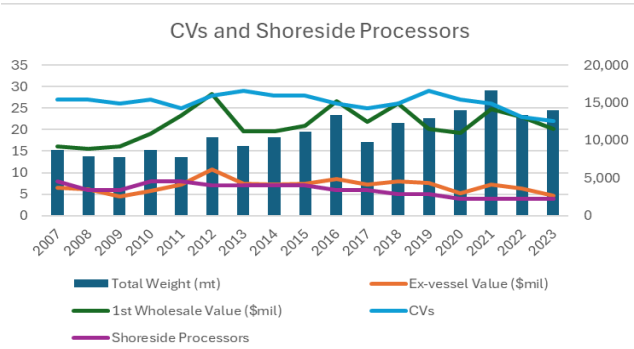
The Council reviewed this issue more broadly under the Amendment 80 program review in December 2024 and did not recommend any regulatory changes to the GOA sideboard limits as part of that review.

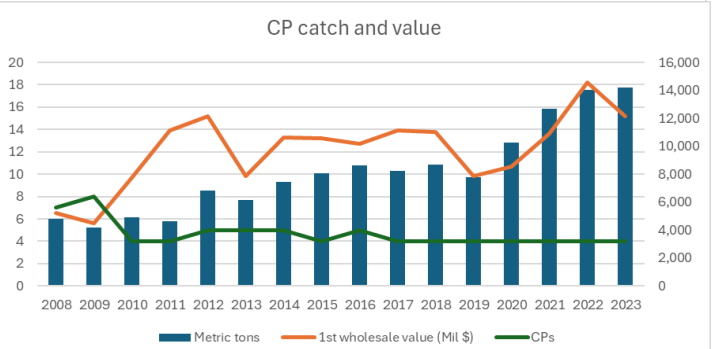
3 Dashboards

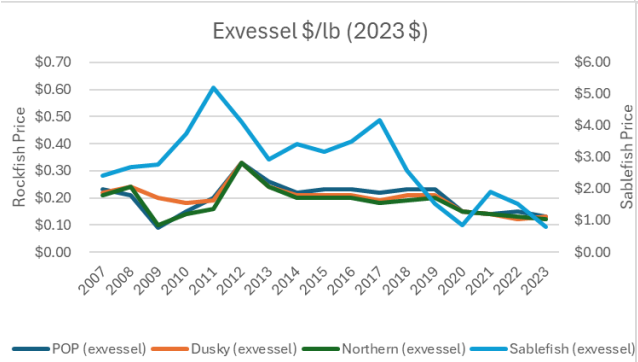
Summary figures are included in this section to provide a high-level overview of the RP fisheries. The information in these figures is described in detail in the relevant sections of the document but provided without discussion in this section. The Council's Scientific and Statistical Committee (SSC) has requested this type of visual summary for program reviews to see changes in the fishery at a glance.

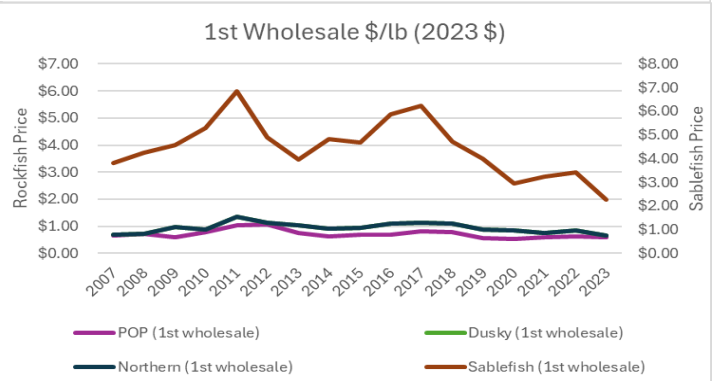


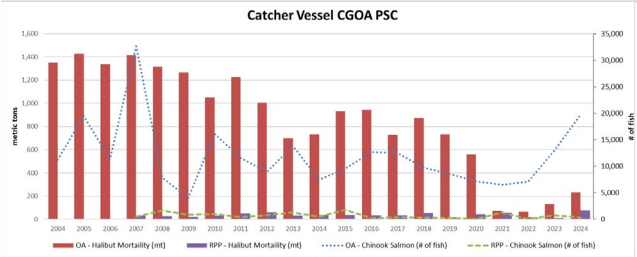


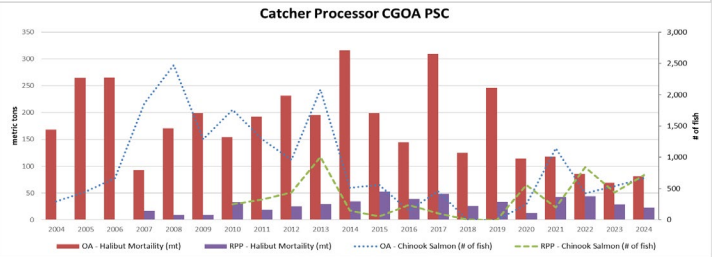












4 Cooperatives, Contracts, and Reports

Under both the RPP and RP all cooperatives have complied with the cooperative contract and report requirements. Membership in a cooperative is determined by the rockfish cooperative contract which must be signed by all its members. Violations of RP contracts by a cooperative member may be subject to private civil claims by other members of the rockfish cooperative. NMFS does not enforce cooperative contracts.

The rockfish cooperatives formed under the RP are intended to conduct and coordinate harvest activities for their members. Rockfish cooperatives are subject to antitrust laws and collective price negotiation must be conducted within existing antitrust laws.

4.1 Overview of RP Cooperatives

A total of five CP cooperatives were created under the RPP (Table 4-1). Two CP cooperatives were active during the first three years of the RPP, and they consisted of five total LLP licenses and vessels. A third cooperative was formed in 2010. All five RPP CP cooperatives were active during 2011, the last year of the RPP. Under the RP two cooperatives formed from 2012 through 2017. Mergers within the sector and the benefits of a single cooperative in that sector have resulted in one cooperative forming in the CP sector from 2018 through 2024.

Table 4-1 LLP licenses (vessels) assigned to each cooperative during the RPP and RP.

	Cooperative	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
CP	Cascade Unimak Rockfish Co-op					2 (2)													
	FCA Co-op	3 (3)	3 (3)	3 (3)	3 (3)	3 (3)	3 (3)	3 (3)	3 (3)	3 (3)	3 (3)	5 (4)							
	Gulf Of Alaska Best Use Co-op				2 (2)	2 (2)	8 (7)	8 (7)	8 (7)	8 (7)	8 (7)	6 (6)	11 (10)	11 (10)	11 (9)	11 (9)	11 (9)	11 (7)	11 (7)
	Trident Offshore Rockfish Co-op Asso	2 (2)	2 (2)	2 (2)	3 (3)	3 (3)													
	USS Rockfish Cooperative					2 (2)													
CP Total		5 (5)	5 (5)	5 (5)	8 (8)	12 (12)	11 (10)	11 (10)	11 (10)	11 (10)	11 (10)	11 (10)	11 (10)	11 (10)	11 (9)	11 (9)	11 (9)	11 (7)	11 (7)
CV	Global Rockfish Cooperative						3 (3)	2 (2)	3 (3)	3 (3)	3 (3)	3 (3)							
	I.S.A. Rockfish Cooperative	9 (9)	9 (9)	9 (9)	10 (10)	10 (10)	6 (6)	6 (6)	6 (6)	5 (5)	6 (5)	6 (6)	6 (8)	6 (7)	6 (7)				
	North Pacific Rockfish Cooperative	6 (6)	6 (6)	6 (6)	6 (6)	6 (6)	10 (9)	11 (10)	12 (11)	12 (11)	12 (11)	12 (11)	13 (12)	13 (11)	13 (10)	12 (9)	13 (10)	13 (10)	11 (8)
	OBSI Rockfish Cooperative	8 (7)	8 (7)	8 (7)	8 (7)	8 (7)	9 (8)	8 (7)	7 (6)	7 (6)	6 (5)	6 (5)	6 (5)	6 (5)	6 (5)	7 (5)	9 (8)	9 (8)	9 (8)
	Pacific Rockfish Coop						2 (2)	2 (2)	2 (2)	2 (2)	2 (2)	2 (2)	2 (2)	2 (2)	2 (2)	2 (2)			
	Silver Bay Seafoods Rockfish Co-op														7 (8)	6 (6)	7 (6)	6 (11)	11 (9)
	Star Of Kodiak Rockfish Cooperative	11 (11)	12 (12)	12 (12)	12 (12)	12 (12)	11 (10)	11 (10)	11 (10)	11 (10)	11 (10)	11 (10)	12 (11)	12 (12)	12 (12)	11 (11)	11 (11)	11 (11)	11 (11)
	Western Alaska Fisheries Rockfish C	10 (10)	10 (10)	10 (10)	10 (10)	10 (10)	5 (5)	6 (6)	5 (5)	6 (6)	6 (6)	6 (6)	6 (6)	6 (6)	6 (6)	6 (6)	6 (6)	6 (6)	4 (4)
CV Total		44 (43)	45 (44)	45 (44)	46 (45)	46 (45)	46 (43)	46 (43)	46 (43)	46 (43)	46 (42)	46 (43)	45 (44)	45 (43)	45 (42)	45 (41)	45 (41)	46 (41)	46 (40)
Total		49 (48)	50 (49)	50 (49)	54 (53)	58 (57)	57 (53)	57 (53)	57 (53)	57 (53)	57 (52)	57 (53)	56 (54)	56 (53)	56 (51)	56 (50)	56 (50)	57 (48)	57 (47)

Source: NMFS RAM Division Cooperative data

A total of 15 CP LLP licenses were issued primary species quota during the RPP. Not all the CP LLP licenses that were issued quota during the RPP were assigned to a cooperative. Because of the change in the qualifying years, five of those LLP licenses were not issued QS under the RP, and one CP LLP license that was not issued QS under the RPP was issued QS under the RP. These changes resulted in 11 CP LLP licenses being issued QS under the RP. Program rule changes created incentives for these LLP licenses to be assigned to a cooperative under the RP.

A total of 55 CV LLP licenses were allocated primary species during either the RPP (47 CV LLP licenses) or the RP (46 CV LLP licenses). The CV LLP licenses were assigned to five cooperatives during the RPP and eight different cooperatives during the RP, but a maximum of seven cooperatives in any one year. Five cooperatives were formed in 2024 as a result of the decline in active participation by Kodiak based processors, but only four processed any of their allocation.

Nine CV LLP licenses that were issued primary species quota under the RPP did not have a primary species allocation under the RP. Eight CV LLP licenses that did not have an allocation under the RPP were issued quota under the RP. The difference in the number of LLP licenses with primary quota under the two programs was due to the different qualifying years to determine quota allocations and the inclusion of the limited entry fishery under the RPP that allowed LLP licenses to be issued quota under the RP.

4.2 Cooperative Contracts

A rockfish cooperative must have a membership agreement, or contract, that specifies how the rockfish cooperative intends to harvest its CQ. A copy of this agreement or contract must be submitted to NMFS with the cooperative's application for CQ. Those contracts allow NMFS to determine the annual allocation of CQ among the cooperatives that are formed each year.

Contracts are used to enforce good fishing practices by its members and define penalties for persons overharvesting their allocation. For example, contracts set acceptable halibut PSC rates by target fishery in the RP fisheries. Halibut use rates are determined by cooperative members based on what the membership determines is achievable, while taking into account the rates necessary to harvest all CQ. Individual accountability is enforced through the cooperative. If a vessel exceeds the specified halibut PSC rates, the vessel operator is required to stop fishing until the vessel's fishing practices can be assessed by the appropriate representatives of the cooperative.[13] The CV cooperatives also implemented measures to minimize Chinook salmon PSC even though it is not allocated to cooperatives. For example, at the start of the fishing year each cooperative allowed only one or two vessels to fish at a time to gauge Chinook salmon encounters. The CV sector also implemented individual vessel Chinook salmon bycatch standards through the cooperatives contracts that were based on fish ticket counts of Chinook salmon.

4.3 Cooperative Reporting Requirements

The RPP did not include a requirement for annual cooperative reports, but the RP initially included specific reporting requirements. Through 2021, all rockfish cooperatives were required to submit an annual cooperative report to NMFS by December 15 of each year. Annual rockfish cooperative reports were required to include at a minimum:

- the rockfish cooperative's CQ,
- sideboard limits (if applicable),
- rockfish sideboard fishery harvests made by the vessels in the rockfish cooperative on an area and vessel level,
- the rockfish cooperative's actual retained and discarded catch of CQ,
- a description of the method used by the rockfish cooperative to monitor fisheries in which rockfish cooperative vessels participated, and

[13] Julie Bonney April 2017: RP catcher vessel cooperative report to the NPFMC for the 2016 fishing year

- a description of any private civil actions taken by the rockfish cooperative in response to any members that exceeded their allowed catch.

Under Amendment 111, cooperative reporting requirements were altered such that cooperatives were no longer required to submit reports to NMFS. The Council requested that cooperatives continue to provide it an annual report, usually at the April Council meeting. Cooperative reports for 2016 forward are available at the meeting archive[14] or the Council's cooperative report page.[15] In recent years, the CV cooperative representatives have provided an oral report, and the CP representatives have provided a written report.

[14] https://meetings.npfmc.org/Search/Search?ObjectType=Meeting&SearchText=NPFMC&SearchFields=Name&SelectedMeetingGroups=1&SelectedMeetingGroups=21&SelectedMeetingGroups=42&SelectedMeetingGroups=101&SelectedMeetingGroups=121&MeetingDate=&MeetingStart=&MeetingEnd=

[15] https://www.npfmc.org/cooperative-reporting/

5 TACs, Allocations, Harvests, and Transfers

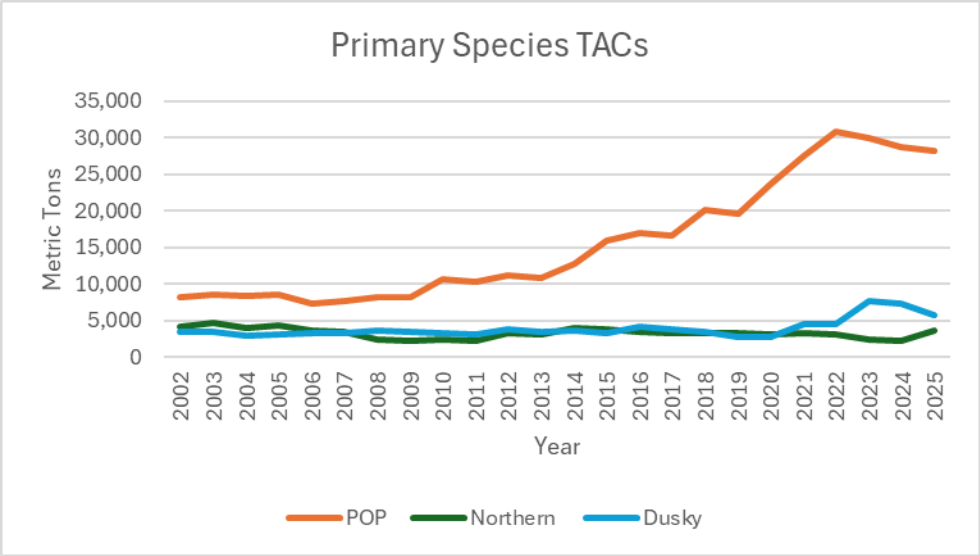
5.1 TACs

TACs for species allocated under the Central GOA RP are reported in this section for 2002 through 2025. Primary RP species TACs are set equal to the Allowable Biological Catch (ABC). Over Fishing Levels (OFL) are set GOA-wide for Northern rockfish and dusky rockfish. OFLs for Pacific ocean perch are set for Southeast Outside and the combined Western GOA, Central GOA, and West Yakutat areas. Because there is no OFL set for the Central GOA it is not reported, and the ABCs are not reported since they are equal to the TAC.

5.1.1 Primary Species

Central GOA TACs set for Pacific ocean perch, Northern rockfish, and dusky/pelagic shelf rockfish are reported in Figure 5-1. Central GOA Pacific ocean perch TACs ranged between about 6,000 mt early in the period to about 31,000 in 2022 before declining in each of the last three years. Northern rockfish and dusky rockfish TACs remained steady until 2022 when the dusky TAC increased, and the Northern rockfish TAC declined. Northern rockfish TACs ranged from 2,280 mt to 4,640 mt and the 2024 TAC was the least during that period. Dusky rockfish TACs ranged from 2,746 mt to 7,647 mt and the 2023 TAC was the greatest over the period considered.

Figure 5-1 Central GOA TACs (mt) for primary RP species (2002 through 2025)



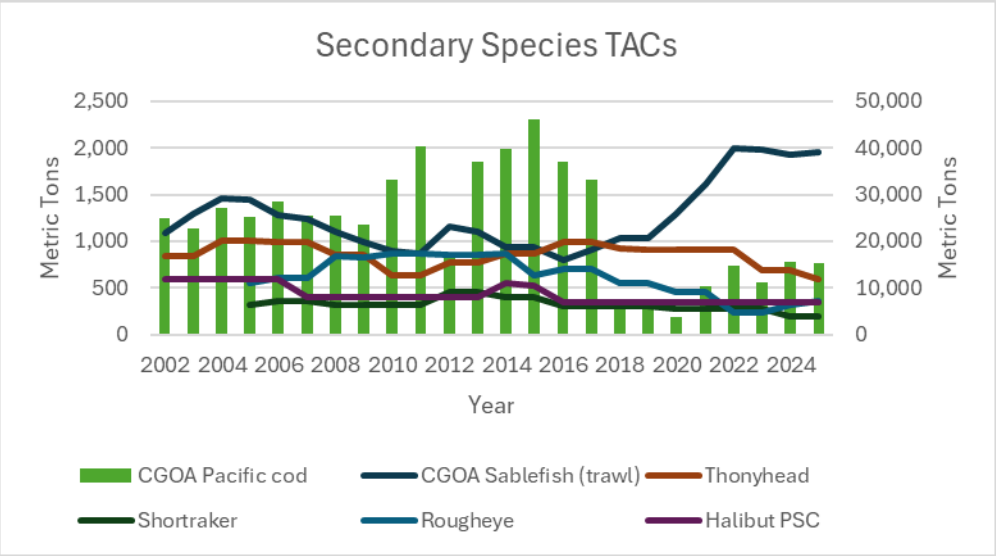
Source: NMFS Harvest Specifications Tables

Primary species TACs are divided into four parts for the management of the Central GOA fishery. An ICA is set to cover the catch of these species in other target fisheries. The 2025 ICA for Pacific ocean perch, Northern rockfish, and dusky rockfish was 3,000 mt (decreased from 3,500 mt in 2024), 300 mt, and 250 mt, respectively. The Pacific ocean perch ICA more than doubled from the 2016 ICA of 1,500 mt. The ICA for Northern rockfish and dusky rockfish was the same as the 2016 ICA and was unchanged over that entire period; the remainder of the TAC, after setting the ICA, is allocated to the longline gear entry-level fishery, CV cooperative quota, and CP cooperative quota. The quotas allocated to cooperatives and the entry-level set aside are discussed later in this chapter.

5.1.2 Secondary Species

Secondary species allocated under the RP include three rockfish species, Pacific cod, and sablefish. A halibut PSC limit is also implemented under the RP based on a division of the 3rd halibut seasonal release. The total 3rd season halibut PSC limit for the GOA is also used to determine the RP halibut PSC limit. The three rockfish species TACs are shown in Figure 5-2. Separate TACs for shortraker rockfish and rougheye rockfish are presented for 2005 through 2025. Before 2005, the TACs for the two species had been combined and were not included in the figure. Pacific cod TACs are also included in the figure and the TAC is substantially larger than the other species' TACs but has been lower than the long-term average since 2018. To better visually display the values of all species the Pacific cod TACs are shown as bars on the secondary axis. The amount of the Pacific cod TAC assigned to the RP is relatively small compared to historical TACs shown in the figure because prior to the RPP being implemented the TAC was shared by all gear types and divided with 60 percent allocated to the A season (January 20th through June 10th for trawl gear) and 40 percent allocated to the B season (September 1st through November 1st for trawl gear). The non-trawl A season began January 1 and ended on the same date as the trawl fishery. The B season started on the same date as the trawl fishery but did not end until December 31st. The timing of the Pacific cod fishery meant that trawl gear was not open to directed fishing during July when the rockfish fishery historically took place. As a result, the portion of the TAC allocated to the RP is 3.81 percent of the total Central GOA TAC. The sablefish TAC is divided so that 80 percent is assigned for harvest by fixed gear and 20 percent by trawl gear. Trawl sablefish TACs are shown in the figure. The 2025 trawl allocation of sablefish in the Central GOA is further apportioned to the RP cooperatives (990 mt). This results in 934 mt being available for the non-RP trawl fisheries.

Figure 5-2 Central GOA TACs (mt) for secondary species and halibut PSC (2002 through 2025)



Source: NMFS Harvest Specifications Tables

Secondary RP TACs varied over the periods considered. Thornyhead rockfish TAC in 2024 and 2025 was closer to its level at the end of the RPP. Shortraker and rougheye TACs in 2025 were over half of their average during the RP.

Secondary species TACs are divided between the cooperative quota and the non-RP fisheries. A portion of the Pacific cod TAC is allocated to the CV cooperatives, and the remainder is available to non-RP participants. A portion of the shortraker and rougheye TACs are allocated to CP cooperatives with the remainder available to the non-RP fisheries. Portions of the sablefish and thornyhead rockfish TACs are

allocated to the CV and CP cooperatives, with the remainder being allocated to the non-RP fishery. Vessels that are members of the cooperatives may utilize the available non-RP portion of the TACs after their cooperative checks out of the RP by notifying NMFS.

5.2 Allocations

Allocations of Central GOA rockfish species are discussed in this section. Sector allocations are presented for both the longline entry-level fishery and the trawl sectors. Allocations to LLP licenses and cooperatives are resented for the trawl fisheries. Tables for the trawl CVs and trawl CPs compare publicly available information on the change in the initial allocation they received under the RPP and the RP.

5.2.1 Entry-level Longline Fishery

The RP includes a small entry-level longline gear allocation that may be harvested by vessels using hook-and-line, troll, hand line, or jig gear. Pot gear is not included as legal gear in this fishery. Entry-level longline fishery vessels are not eligible to join cooperatives, are not allocated exclusive harvest privileges, and are not subject to cost recovery.

The trawl entry-level fishery was eliminated when the RP was implemented. Participants in the trawl entry-level fishery under the RPP were allocated RP quota shares. As a result of that action, the Pacific ocean perch trawl allocation in Table 5-1 is listed as "n/a" since it is no longer applicable.

The entry-level fishery was set as a percentage of the TAC under the RPP. When the RP was implemented, the amount available to the entry-level longline fishery was reduced and set as an amount in mt because it had not been fully harvested under the RPP.

As noted in Table 5-1 the dusky rockfish allocation was increased in 2017 from 30 mt to 50 mt.[16] This accommodated the increased catch realized by the jig gear vessels harvesting from the entry-level allocation during the previous year. Given that the dusky rockfish TAC is currently 5,818 mt (Figure 5-1), the 50 mt allocation is less than 0.9 percent of the TAC and about 17 percent of the maximum entry-level allocation (291 mt at the current TAC) allowed. The allocations of the other two species are also allowed to increase, but the entry-level longline fishery has not taken 90 percent of the allocation of Pacific ocean perch or Northern rockfish, as of 2024. At the current TAC levels the maximum Pacific ocean perch allocation would be 282 mt and the maximum Northern rockfish allocation would be 74 mt.

[16] The dusky rockfish (pelagic shelf rockfish) allocation is increased by 20 mt if ≥ 90 percent of the allocation is harvested the previous year. The allocation is capped if the longline fishery reaches 5 percent of the TAC after deducting the incidental catch allowance. Pacific ocean perch and Northern rockfish allocations increase by 5 mt if ≥ 90 percent of the allocation is harvested the previous year and is capped at 1 percent and 2 percent of the TAC, after deducting the incidental catch allowance, respectively.

Table 5-1 Entry-level Fishery Allocations (mt)

		Year																		
		RPP					RP													
Species	Gear	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Dusky (pelagic shelf)	Fixed	161	175	165	157	148	30	30	30	30	30	50	50	50	50	50	50	50	50	50
Northern Rockfish	Fixed	169	115	110	115	109	5	5	5	5	5	5	5	5	5	5	5	5	5	5
POP	Fixed	17	54	63	120	119	5	5	5	5	5	5	5	5	5	5	5	5	5	5
POP	Trawl	347	345	339	392	375	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Source: NMFS annual specifications tables
"n/a" means it is not applicable because the allocation is no longer part of the program

Table 5-2 shows the reported catch of dusky rockfish in the Central GOA under the entry-level fishery from 2017 through 2024 regarding the percentage of the entry-level fishery allocation harvested and mt of catch. The table does not include Pacific ocean perch and Northern rockfish because the reported annual catch was 0 mt. each year. The downward trend in the use of dusky rockfish and the very low catch of the two other entry-level fishery species may indicate that it is unlikely that the limit would be increased in the near term.

Table 5-2 Dusky rockfish entry-level fishery catch from 2017 through 2024

Year	*% of Limit*	*Metric Tons*
2017	31	16
2018	17	8
2019	25	13
2020	14	7
2021	6	3
2022	4	2
2023	2	1
2024	2	1

Source: https://www.fisheries.noaa.gov/resource/document/alaska-inseason-management-annual-reports-north-pacific-fishery-management

5.2.1.1 Allocation to CVs

Allocations of primary species to CV LLP licenses under the RPP and RP changed somewhat because of the change in the qualifying period used to determine the allocation and the transfer provisions between sectors under the RPP. A total of 8 CV LLP licenses were granted an allocation for the RPP but did not qualify under the RP (Table 5-3). The aggregate allocation to these licenses was 3 percent of the CV QS for Northern rockfish, 6 percent of the QS for Pacific ocean perch, and 2 percent of the QS for dusky rockfish. Nine LLP licenses that did receive an allocation under the RP but not the RPP accounted for 5 percent of the CV QS for Northern rockfish, 9 percent of the Pacific ocean perch QS, and 6 percent of the dusky rockfish QS.

Table 5-3 Change in the number of qualified CV LLP licenses under RPP and RP

Period	Designation	Northern	POP	Dusky (PSR)	Total
Entered after RPP	CV	9	10	9	9
Exited after RPP	CV	10	8	9	8

The percentage of the total (CV and CP) QS pool assigned to CV LLP licenses changed under the RPP and RP. Several quota transfers between cooperatives occurred in the first year of the RPP. Quota transfers within sectors were a relatively minor share of the sector's overall allocation. The reasons for minor within-sector transfers differed for the two sectors. In the CP sector, only one cooperative fished its allocation. The other cooperative elected to transfer most of its allocation to the CV sector, which its affiliated shoreside processing plant could process. In the CV sector, most vessels and their associated processors wanted to remain active in the fishery.

Across sector transfers were allowed only from the CP cooperatives to the CV cooperatives. This 'one-way door' is intended to protect the interests of shore plants and communities if CP production efficiencies exceed those of the shoreside sector. The CP cooperative with an affiliated shoreside processor accounted for a large share of these transfers, yet the transfers were distributed among several CV cooperatives. The second CP cooperative transferred a portion of its allocation to CV cooperatives, partly to avoid potential quota constraints. With only a single vessel fishing for a single cooperative in the CP sector, it was perceived that the potential for an overage outweighed any benefit from attempting to fish the entire allocation. Compared to the RPP, the CV sector was assigned 2.18 percent less of the Northern rockfish QS, 10.35 percent more of the Pacific ocean perch QS, and 16.27 percent more of the dusky QS in the RP.

At the LLP license level, 31 CV LLP licenses were allocated a smaller percentage of the Northern rockfish QS pool under the RP than the RPP, one LLP license was allocated no QS under both programs, and 23 LLP licenses were allocated a larger percentage of the QS pool. The percentage changes ranged from -3.05 percent to 2.60 percent. LLP licenses issued Pacific ocean perch QS showed that 21 had a reduced percentage allocation (up to -1.02 percent) and 34 had an increase in the percent of the QS pool they were allocated (up to 1.87 percent). The numbers were similar for pelagic shelf rockfish/dusky rockfish, with 20 LLP licenses allocated a smaller percentage (up to -1.14 percent), one receiving no allocation under either program and 34 LLP licenses being allocated a larger percentage of the QS pool (up to 2.11 percent). These changes represent different levels of catch associated with the LLP license under the two qualifying periods.

5.2.1.2 Initial Allocations of Primary Species to CP LLP Licenses

Allocations of primary species to CP LLP licenses under the RPP and RP are presented in Table 5-4.

Table 5-4 Change in the number of qualified CP LLP licenses under RPP and RP

Period	Designation	Northern	POP	Dusky (PSR)	Total
Entered after RPP	CP	3	1	2	1
Exited after RPP	CP	5	6	5	5

A total of seven CP LLP licenses were allocated a smaller percentage of the Northern rockfish QS pool under the RP than the RPP, two LLP licenses were allocated no QS under both programs, and seven LLP licenses were allocated a larger percentage of the QS pool. The percentage changes ranged from -2.99

percent to 3.65 percent. CP LLP licenses issued Pacific ocean perch QS showed that 11 had a reduced percentage allocation (up to -4.96 percent), and five had an increase in the percentage of the QS pool they were allocated (up to 1.99 percent). In addition to the redistribution within the sector, the decrease is due to 10.35 percent more of the QS pool being allocated to the catcher/vessel sector. Five pelagic shelf rockfish/dusky rockfish LLP CP licenses were allocated a smaller percentage (up to -6.19 percent), one receiving no allocation under both programs, and 11 CP LLP licenses were allocated a larger percentage of the QS pool (up to 2.87 percent). Like under the Pacific ocean perch discussion, more CP LLP licenses realized a reduced allocation percentage of the QS pool because the sector received a reduction of 16.27 percent of the overall QS pool.

5.2.2 Initial Annual Allocations Cooperatives

Each year cooperatives are allocated CQ based on the LLP licenses that are assigned to the cooperative. CQ has been assigned since 2007 when the RPP was implemented. Tables in this section report in the initial allocation primary, secondary, and halibut PSC that was assigned to the CV and CP cooperatives that formed annually. Recall that secondary and PSC species are allocated based on the primary species catch history during the qualifying period.

5.2.2.1 Primary species

Table 5-5 shows the allocation of primary species to cooperatives. The allocations vary annually because of the LLP licenses assigned to the cooperative and the annual changes in the Central GOA TACs. The number of LLP licenses assigned to each cooperative is reported in Table 4-1. Figure 5-1 shows the Central GOA TACs for primary rockfish species.

Table 5-5 shows that in the catch/processor sector, the quota assigned to the limited access fishery declined after 2009. In the last two years of the RPP, the Best Use Cooperative was formed, and the quota previously assigned to the limited access fishery was assigned to that cooperative. When the RP went into effect, the limited access fishery was eliminated, and the CP quota was assigned to either the Best Use Cooperative or the FCA cooperative. A goal of the RP was to create incentives for the CP sector to fish within cooperatives instead of opting out of the program and fishing in the limited-entry fishery. Based on 100 percent of the LLP licenses with QS being assigned to cooperatives each year of the RP, the changes implemented have successfully achieved their objective.

Table 5-5 Allocations of primary species (mt) to cooperatives and the limited access fishery, 2007 through 2024.

			Year																	
Species	Designat	Co-op	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
	CP	Cascade Unimak Rockfish Cooperative					129													
		CGOA RPP CP Limited Access	1,072	1,199	1,142	211	359													
		FCA Cooperative	141	147	134	178	167	278	249	253	230	291	469							
		GOA Rockfish Best Use Cooperative				837	442	1,115	997	1,013	923	1,168	846	1,208	930	923	1,603	1,597	2,772	2,665
		Trident Offshore Rockfish Co-op	470	491	446	411	385													
		USS Rockfish Cooperative					53													
	CP Total		1,683	1,837	1,722	1,637	1,534	1,393	1,246	1,265	1,153	1,459	1,315	1,208	930	923	1,603	1,597	2,772	2,665
Dusky Rockfish/PSR	CV	Global Rockfish Cooperative						13	11	37	33	42	38							
		I.S.A. Rockfish Cooperative	173	189	177	173	162	271	243	246	200	349	315	313	241	239				
		North Pacific Rockfish Cooperative	187	205	192	183	17	406	364	440	401	508	458	431	332	329	482	515	894	725
		O.B.S.I. Cooperative	321	351	329	313	294	639	530	467	425	442	399	366	282	280	576	730	1,111	1,069
		Pacific Rockfish Cooperative						88	79	80	73	92	83	76	59	58	101		58	
		Silver Bay Seafoods Rockfish Co-op															428	336	740	967
		Star of Kodiak Rockfish Cooperative	368	405	380	362	339	722	645	655	597	755	681	625	481	478	817	814	1,413	1,359
		Western AK Fisheries Rockfish Co-op	331	362	339	323	303	162	186	163	173	219	198	182	140	139	241	240	417	281
	CV Total		1,380	1,512	1,417	1,355	1,270	2,301	2,057	2,089	1,903	2,408	2,171	1,994	1,534	1,523	2,645	2,637	4,633	4,400
Dusky Rockfish/PSR Total			3,064	3,350	3,139	2,992	2,804	3,694	3,303	3,354	3,056	3,867	3,486	3,202	2,464	2,446	4,248	4,234	7,405	7,065
	CP	Cascade Unimak Rockfish Cooperative					12													
		CGOA RPP CP Limited Access	704	524	508	155	152													
		FCA Cooperative	284	168	157	250	238	419	390	496	465	422	637							
		GOA Rockfish Best Use Cooperative				299	136	871	809	1,031	965	877	584	1,185	1,216	1,151	1,214	1,161	820	792
		Trident Offshore Rockfish Cooperative	282	166	156	141	134													
		USS Rockfish Cooperative					22													
	CP Total		1,270	858	820	845	803	1,290	1,199	1,528	1,430	1,299	1,222	1,185	1,216	1,151	1,214	1,161	820	792
Northern Rockfish	CV	Global Rockfish Cooperative						17	16	29	27	25	23							
		I.S.A. Rockfish Cooperative	224	153	146	160	152	210	195	249	226	296	279	277	284	269				
		North Pacific Rockfish Cooperative	247	169	162	168	160	283	263	413	387	352	331	336	345	326	282	307	217	171
		O.B.S.I. Cooperative	492	336	321	334	317	550	470	520	487	352	331	321	329	312	391	461	283	274
		Pacific Rockfish Cooperative						92	86	109	102	93	87	85	87	82	87		82	
		Silver Bay Seafoods Rockfish Co-op															289	234	207	278
		Star of Kodiak Rockfish Cooperative	443	312	299	310	295	622	578	736	688	626	589	571	585	555	580	555	391	378
		Western AK Fisheries Rockfish Co-op	535	365	349	363	345	157	186	228	220	200	188	183	187	177	187	179	126	84
	CV Total		1,940	1,335	1,277	1,335	1,269	1,931	1,793	2,284	2,137	1,943	1,827	1,771	1,817	1,722	1,815	1,736	1,308	1,183
Northern Rockfish Total			3,210	2,193	2,098	2,180	2,072	3,221	2,992	3,812	3,567	3,242	3,049	2,956	3,033	2,873	3,029	2,897	2,127	1,975
	CP	Cascade Unimak Rockfish Cooperative					567													
		CGOA RPP CP Limited Access	1,045	1,414	1,432	663	459													
		FCA Cooperative	1,700	1,671	1,679	2,460	2,382	2,560	2,476	2,879	3,427	3,837	3,918							
		GOA Rockfish Best Use Cooperative				921	442	1,500	1,452	1,688	2,009	2,249	1,831	6,314	6,523	8,103	9,770	11,093	10,558	9,898
		Trident Offshore Rockfish Cooperative	779	765	769	857	829													
		USS Rockfish Cooperative					51													
	CP Total		3,523	3,851	3,880	4,901	4,729	4,060	3,928	4,566	5,436	6,087	5,749	6,314	6,523	8,103	9,770	11,093	10,558	9,898
Pacific Ocean Perch	CV	Global Rockfish Cooperative						205	178	483	575	644	608							
		I.S.A. Rockfish Cooperative	601	659	664	881	850	907	878	1,020	967	1,477	1,395	1,914	1,978	2,457				
		North Pacific Rockfish Cooperative	367	403	406	516	498	987	975	1,248	1,485	1,663	1,571	2,012	2,078	2,582	2,867	3,571	3,399	2,583
		O.B.S.I Cooperative	647	709	715	909	878	1,411	1,167	1,242	1,479	1,261	1,191	1,308	1,352	1,679	2,270	3,853	3,402	3,189
		Pacific Rockfish Cooperative						276	267	311	370	414	391	430	444	551	665		551	
		Silver Bay Seafoods Rockfish Co-op															3,207	2,805	2,935	4,066
		Star of Kodiak Rockfish Cooperative	761	847	853	1,086	1,048	1,593	1,541	1,791	2,132	2,387	2,255	2,476	2,559	3,178	3,587	4,073	3,876	3,634
		Western AK Fisheries Rockfish Co-op	1,019	1,117	1,126	1,432	1,382	919	1,088	988	1,424	1,594	1,506	1,654	1,709	2,123	2,559	2,906	2,765	1,881
	CV Total		3,395	3,735	3,764	4,824	4,656	6,298	6,093	7,084	8,432	9,441	8,917	9,793	10,118	12,570	15,154	17,208	16,929	15,354
Total			6,918	7,586	7,644	9,725	9,385	10,358	10,021	11,650	13,868	15,528	14,666	16,107	16,641	20,673	24,924	28,301	27,486	25,252

Source: Annual cooperative allocations reported on the NMFS AKR website.
e.g. https://alaskafisheries.noaa.gov/sites/default/files/reports/17rpallocations.xls.

5.2.2.2 Secondary Species

Secondary species are allocated to cooperatives based on the primary species QS assigned to a cooperative. Therefore, the same trends reported in the primary species allocation to cooperatives are realized for the secondary rockfish species (Table 5-6). Shortraker and rougheye are not allocated to the CV cooperatives under the RP and are managed under an MRA. Pacific cod is not allocated to the CP sector because that species is limited by an MRA that is set lower than the 20 percent MRA applicable to most fisheries (including the rockfish fisheries before the RPP) to maintain catch of the sector at its historical level.

Table 5-6 Allocations of secondary species (mt) to cooperatives, 2007 through 2024

Species/Sector/Cooperative	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Global Rockfish Cooperative						35	28	68	78	63	56							
I.S.A. Rockfish Cooperative	87	87	72	117	129	212	183	198	194	216	194	41	39	26				
North Pacific Rockfish Cooperative	70	70	58	91	498	256	225	279	322	259	232	47	45	29	70	111	84	95
OBSI Rockfish Cooperative	128	128	107	166	317	406	312	300	346	218	196	36	34	22	70	138	93	130
Pacific Rockfish Coop						71	62	67	77	62	55	10	10	6	17		6	
Silver Bay Seafoods Rockfish Cooperative															74	84	73	146
Star Of Kodiak Rockfish Cooperative	137	140	116	181	199	459	397	428	494	397	356	65	62	41	106	153	115	160
Western Alaska Fisheries Rockfish Coop	165	165	137	214	19	188	202	179	241	194	174	32	30	20	54	78	58	58
CV Pacific Cod	587	590	491	768	1162	1627	1408	1517	1752	1409	1262	232	219	145	390	564	430	588
Cascade Unimak Rockfish Cooperative					60													
FCA Cooperative	117	145	142	183	185	237	239	242	177	198	242							
Gulf Of Alaska Rockfish Best Use Cooperative				154	81	262	265	267	195	219	173	327	324	268	268	138	137	185
Trident Offshore Cooperative	86	107	105	98	98													
USS Rockfish Cooperative					10													
CP Rougheye Rockfish	203	252	248	435	434	500	504	509	372	416	416	327	324	268	268	138	137	185
Cascade Unimak Rockfish Cooperative					24													
FCA Cooperative	87	70	62	70	74	96	92	78	78	67	92							
Gulf Of Alaska Rockfish Best Use Cooperative				59	32	106	102	86	86	74	66	181	182	226	283	350	348	339
Trident Offshore Cooperative	64	51	46	37	39													
USS Rockfish Cooperative					4													
CP Total	150	121	108	166	173	202	194	164	163	141	158	181	182	226	283	350	348	339
Global Rockfish Cooperative						8	7	14	14	12	14							
I.S.A. Rockfish Cooperative	57	51	46	43	46	51	49	41	35	42	47	62	63	78				
North Pacific Rockfish Cooperative	46	41	37	34	35	62	60	58	58	50	56	71	71	89	98	133	133	106
OBSI Rockfish Cooperative	84	75	68	61	65	97	83	63	62	42	47	54	54	68	98	165	148	144
Pacific Rockfish Coop						17	16	14	14	12	13	15	15	19	24		19	
Silver Bay Seafoods Rockfish Cooperative															103	101	117	163
Star Of Kodiak Rockfish Cooperative	90	82	74	67	70	110	106	89	89	77	86	99	99	123	148	183	182	177
Western Alaska Fisheries Rockfish Coop	109	96	87	79	83	45	54	37	43	38	42	48	48	60	75	93	93	64
CV Total	386	345	313	284	299	391	376	317	316	273	306	350	351	437	546	676	692	654
Sablefish Total	537	466	421	451	472	593	570	482	479	414	464	531	533	663	829	1025	1040	993
Cascade Unimak Rockfish Cooperative					11													
FCA Cooperative	34	28	27	35	35	86	86	75	75	57	70							
Gulf Of Alaska Rockfish Best Use Cooperative				30	15	95	95	83	83	63	50	122	122	114	114	112	112	76
Trident Offshore Cooperative	25	21	20	19	19													
USS Rockfish Cooperative					2													
CP Shortraker Rockfish	60	48	48	84	83	181	181	159	159	120	120	122	122	114	114	112	112	76
Cascade Unimak Rockfish Cooperative					17													
FCA Cooperative	74	58	57	53	53	96	96	110	110	124	153							
Gulf Of Alaska Rockfish Best Use Cooperative				44	23	107	107	122	122	137	109	244	241	241	241	241	184	184
Trident Offshore Cooperative	54	43	42	28	28													
USS Rockfish Cooperative					3													
CP Total	128	101	100	125	124	203	203	232	232	262	262	244	241	241	241	241	184	184
Global Rockfish Cooperative						1	1	3	3	3	3							
I.S.A. Rockfish Cooperative	16	14	14	11	11	8	8	9	8	12	12	13	13	13				
North Pacific Rockfish Cooperative	13	11	11	8	171	9	10	13	13	14	14	15	15	15	13	14	11	9
OBSI Rockfish Cooperative	23	20	20	15	182	15	13	14	14	12	12	11	11	11	13	17	12	12
Pacific Rockfish Coop						3	3	3	3	3	3	3	3	3	3		3	
Silver Bay Seafoods Rockfish Cooperative															13	11	9	14
Star Of Kodiak Rockfish Cooperative	25	22	22	16	16	17	17	19	19	22	22	20	20	20	19	19	15	15
Western Alaska Fisheries Rockfish Coop	30	26	26	19	83	7	9	8	9	11	11	10	10	10	10	10	7	5
CV Total	106	93	93	69	463	60	60	69	69	77	77	72	71	71	71	71	57	54
Thornyhead Rockfish Total	234	194	192	194	587	263	263	300	300	339	339	316	313	313	312	312	241	238

Source: Annual cooperative allocations reported on the NMFS AKR website.
e.g. https://alaskafisheries.noaa.gov/sites/default/files/reports/17rpallocations.xls.

5.3 Halibut PSC

Table 5-7 shows the cooperative allocations under the RPP from 2007 through 2011 and under the RP from 2012 through 2024. The amount of halibut PSC associated with CPs varied during the RPP because owners of LLP licenses did not assign all of the licenses to cooperatives each year. This is why the PSC limits in the CP sector are lower in 2007, 2008, and 2009, relative to 2010 and 2011. The primary difference is the formation of the FCA cooperative. Halibut PSC limits assigned to CV cooperatives were similar each year during the RPP. This is expected since the program design assigned CVs to cooperatives based on their historical catch delivery to processors during the qualifying period.

Table 5-7 Initial allocations of halibut PSC limits (mt) to cooperatives, 2007 through 2024

Sector/Cooperative	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Cascade Unimak Rockfish Cooperative					12.7													
FCA Cooperative	35.3	31.9	31.5	39.1	39.2	35.2	35.2	35.2	35.2	35.2	43.2							
Gulf Of Alaska Rockfish Best Use Cooperative				32.9	17.1	38.9	38.9	38.9	38.9	38.9	30.9	74.1	74.1	74.1	74.1	74.1	74.1	74.1
Trident Offshore Cooperative	26	23.6	23.2	20.8	20.9													
USS Rockfish Cooperative					2.2													
CP Total	61.3	55.5	54.7	92.9	92.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1	74.1
Global Rockfish Cooperative						2.5	2.3	5.2	5.2	5.2	5.2							
I.S.A. Rockfish Cooperative	16.9	16.9	16.9	17.6	17.6	15.3	15.3	15.3	13	18	18	20.9	20.9	20.9				
North Pacific Rockfish Cooperative	13.7	13.7	13.7	13.7	13.7	18.5	18.7	21.5	21.5	21.5	21.5	23.8	23.8	23.8	21	23.2	23.2	18.9
OBSI Rockfish Cooperative	25	25	25	25	25	29.3	26	23.2	23.2	18.2	18.2	18.2	18.2	18.2	21	28.7	25.8	25.8
Pacific Rockfish Coop						5.1	5.1	5.1	5.1	5.1	5.1	5.1	5.1	5.1	5.1			
Silver Bay Seafoods Rockfish Cooperative															22.2	17.5	20.3	29.2
Star Of Kodiak Rockfish Cooperative	26.8	27.3	27.3	27.3	27.3	33.9	33.1	33.1	33.1	33.1	33.1	33.1	33.1	33.1	31.8	31.8	31.8	31.8
Western Alaska Fisheries Rockfish Coop	32.2	32.2	32.2	32.2	32.2	13.5	16.8	13.9	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	16.2	11.5
CV Total	114.5	115.1	115	115.7	115.8	118.1	117.3	117.3	117.3	117.3	117.3	117.3	117.3	117.3	117.3	117.3	117.3	117.3
Halibut PSC Total	175.8	170.5	169.7	208.6	207.9	192.2	191.4	191.4	191.4	191.4	191.4	191.4	191.4	191.4	191.4	191.4	191.4	191.4

Source: Annual cooperative allocations reported on the NMFS AKR website.
e.g. https://alaskafisheries.noaa.gov/sites/default/files/reports/17rpallocations.xls.

5.4 Harvest by Sector

Harvest by vessels participating in the Central GOA rockfish fisheries is reported by sector in this section. Confidentiality limitations prohibit reporting catch and processing information at the vessel or processor level. Information cannot be released if it is reasonable to assume that a person with average knowledge of the fishery could:

1. Identify an individual fisherman, determine the fisherman's harvest, or determine the specific location where the fisherman caught fish, or
2. Identify an individual fish buyer or processor and determine the buyer or processor's fish purchasing, processing, and sales activities.

The rule of "3" is typically used as a general guideline when aggregating catch or processing information. Aggregating landings of three or more harvesters and deliveries to three or more processors will sufficiently mask the data so that its release does not violate the confidentiality statute. Given the RP's structure and the processors' location that take delivery of CQ, aggregation of information by sector is used in this program review to abide by the confidentiality requirements.

Table 5-8 and Table 5-9 report the catch of primary and secondary RP species by trawl CVs and trawl CPs in the Central GOA, respectively. Primary species are listed first in the tables, followed by secondary species. The catch is reported by whether it was identified as being harvested under the RPP/RP or not in the Catch Accounting System (CAS) data. The catch is reported in mt and includes a count of vessels. All catches prior to 2007 were not part of the RPP or RP. Since 2007, the catch is not considered part of the RPP or RP if it was harvested prior to May 1st by vessels that opted out of the program or were not part of the program or by vessels after their cooperative checked out of the program.

Table 5-8 CV count and catch (mt) of primary and secondary species in the Central GOA, 2003 through 2024 by management program

Open Access	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Average
Pacific cod																							
Catch (mt)	11,525	11,510	7,667	5,486	7,543	10,463	6,809	13,561	10,621	7,551	8,183	9,747	11,901	6,898	4,544	1,534	1,750	1,772	2,718	4,324	3,842	5,134	7,049
Vessels	34	34	34	33	33	34	33	33	34	36	36	37	37	39	35	38	37	36	36	34	33	32	35
POP																							
Catch (mt)	4,684	4,252	4,302	3,957	9	22	19	100	290	50	223	232	135	470	556	1,110	745	848	517	1,628	1,417	532	1,186
Vessels	32	31	28	32	24	28	22	29	31	33	36	36	37	38	35	38	37	37	35	34	33	31	33
Dusky																							
Catch (mt)	1,272	1,267	975	930	21	25	10	16	58	32	42	41	27	54	34	36	32	22	35	38	42	17	228
Vessels	30	30	31	30	24	26	27	30	30	31	34	35	34	37	30	34	35	35	34	30	32	25	31
Northern																							
Catch (mt)	2,743	2,062	1,689	1,720	44	55	15	26	44	41	93	49	64	54	34	45	29	7	Conf.	Conf.	Conf.	Conf.	Conf.
Vessels	29	29	28	29	24	28	20	26	24	32	33	23	29	34	17	21	28	22	16	12	10	12	24
Rougheye																							
Catch (mt)	38	37	19	46	29	29	19	23	19	19	16	19	14	20	12	20	78	29	11	35	24	15	26
Vessels	22	19	29	27	19	23	25	27	25	25	24	30	29	28	22	30	35	33	31	33	32	29	27
Shortraker																							
Catch (mt)	76	20	19	48	38	37	4	5	8	4	2	3	6	8	2	0	7	22	25	56	118	26	24
Vessels	21	21	24	28	19	18	14	15	15	7	14	12	10	21	12	9	23	32	27	24	32	22	19
Thornyheads																							
Catch (mt)	81	50	44	41	2	13	16	28	23	7	19	106	35	40	16	2	4	6	Conf.	Conf.	Conf.	Conf.	Conf.
Vessels	25	29	24	24	10	9	12	15	19	14	12	12	10	18	14	15	14	15	2	3	2	3	14
Sablefish																							
Catch (mt)	494	517	430	393	20	26	39	89	165	37	36	136	117	207	124	75	171	115	32	33	21	30	150
Vessels	31	32	33	31	26	28	26	25	29	27	17	23	35	35	29	35	35	35	35	34	29	21	30
RPP or RP																							
Pacific cod																							
Catch (mt)					290	576	478	771	705	796	490	1,368	792	196	52	83	162	121	339	464	261	419	465
Vessels					27	25	26	27	25	27	29	28	27	27	23	26	27	24	23	20	20	18	25
POP																							
Catch (mt)					4,486	4,497	4,561	5,911	5,644	6,245	6,012	7,059	8,349	9,400	8,259	9,619	10,831	12,200	14,574	11,671	12,758	10,533	8,478
Vessels					27	27	26	27	25	28	29	28	28	26	24	26	29	27	26	21	22	16	26
Dusky																							
Catch (mt)					1,589	1,596	1,491	1,267	839	2,000	1,487	1,391	1,177	1,802	893	1,514	1,145	889	1,079	830	647	339	1,221
Vessels					26	27	26	27	25	28	28	28	28	26	24	26	28	27	26	21	21	16	25
Northern																							
Catch (mt)					2,146	1,348	1,294	1,134	866	1,812	1,314	1,651	1,239	1,812	292	794	649	444	457	275	125	10	981
Vessels					26	27	23	27	25	27	26	26	24	25	24	24	27	23	21	19	20	11	24
Rougheye																							
Catch (mt)					8	4	9	4	8	14	9	5	9	3	5	7	4	7	2	5	8	3	6
Vessels					19	17	19	16	15	15	16	18	21	18	14	22	21	17	13	15	16	11	17
Shortraker																							
Catch (mt)					5	11	3	5	9	3	11	8	8	17	18	24	12	24	17	29	6	5	12
Vessels					11	13	12	14	16	16	19	15	17	15	11	20	24	16	20	19	19	10	16
Thornyheads																							
Catch (mt)					48	45	36	34	41	36	64	46	43	42	43	51	26	20	18	23	20	27	37
Vessels					26	24	24	27	25	28	25	25	24	26	24	25	25	19	13	18	17	11	23
Sablefish																							
Catch (mt)					468	395	416	348	351	373	368	319	307	271	293	342	343	421	516	605	505	499	397
Vessels					26	26	25	27	25	28	27	27	25	26	24	25	27	25	22	21	19	12	24
Total Catch (mt)	20,913	19,715	15,144	12,621	16,746	19,141	15,219	23,320	19,692	19,021	18,369	22,180	24,222	21,293	15,177	15,256	15,989	16,946	20,343	20,018	19,793	17,590	18,578
Total Vessels	35	34	34	34	33	34	33	33	34	37	37	37	37	39	36	38	38	38	36	34	34	32	35

Source: AKFIN summary of CAS data

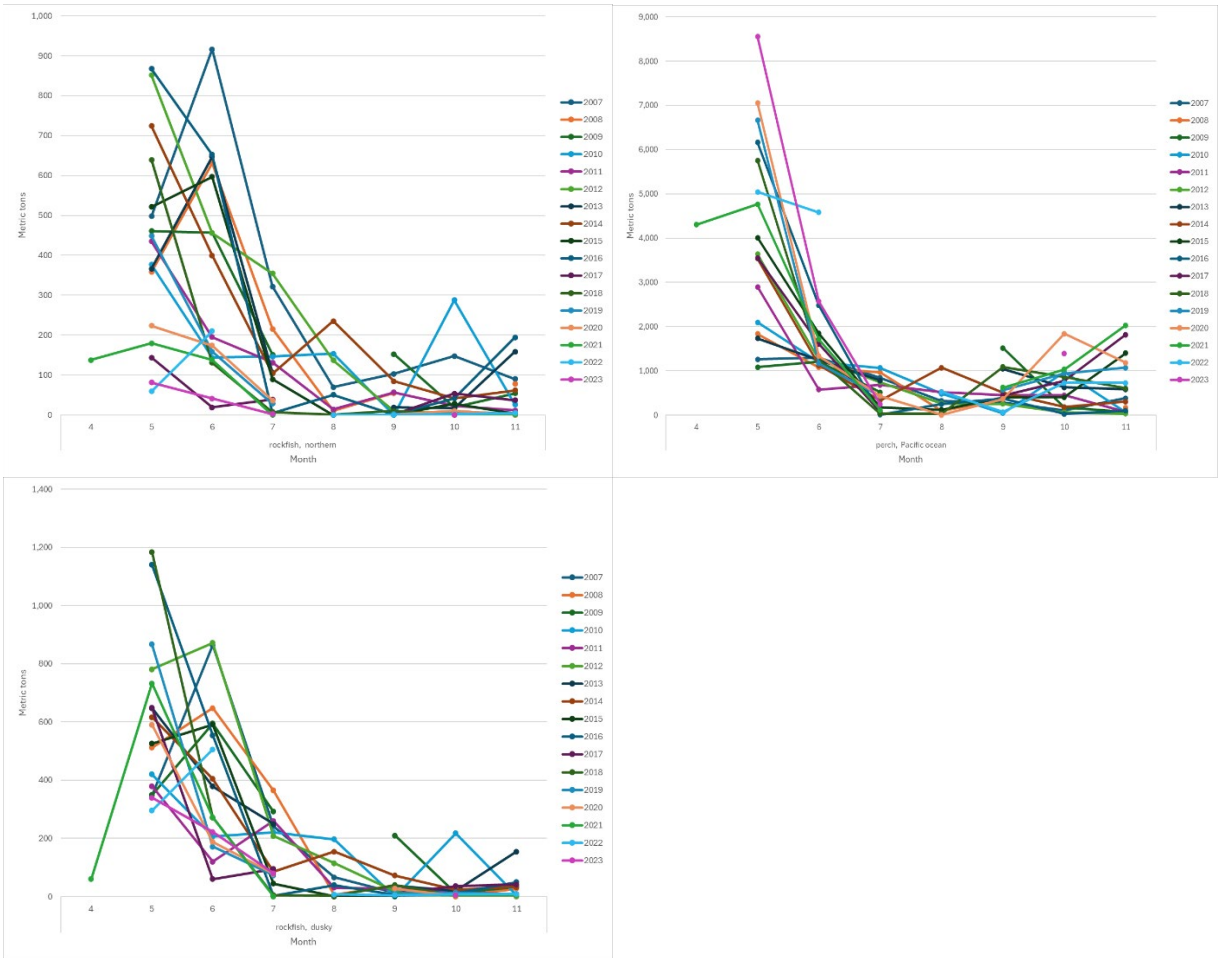
Table 5-9 CP catch (mt) of primary and secondary species in the Central GOA, 2003 through 2024

Open Access	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Average
Pacific cod																							
Catch (mt)	882	482	482	475	202	271	646	172	318	806	878	765	417	222	272	55	conf.	conf.	conf.	161	conf.	conf.	363
Vessels	8	8	8	6	4	7	8	5	3	5	5	4	3	3	3	3	2	2	2	3	2	2	4
POP																							
Catch (mt)	1,915	2,894	2,839	2,699	2,653	25	120	704	565	189	301	343	220	106	274	104	58	139	265	163	conf.	conf.	771
Vessels	6	6	9	5	5	3	4	6	3	4	4	3	3	3	3	3	4	3	3	3	2	2	4
Dusky																							
Catch (mt)	692	674	595	604	764	conf.	13	conf.	375	48	38	55	72	22	73	10	conf.	12	12	conf.	conf.	conf.	192
Vessels	7	6	8	5	3	1	3	2	3	3	4	3	3	3	3	3	2	3	3	2	2	2	3
Northern																							
Catch (mt)	1,564	1,329	1,586	1,653	824	conf.	21	126	155	15	9	91	62	11	23	conf.	conf.	conf.	conf.	3	conf.	conf.	342
Vessels	6	6	8	4	3	2	3	4	3	3	4	3	3	3	3	2	2	2	2	3	2	2	3
Rougheye																							
Catch (mt)	81	34	42	9	19	15	15	6	16	5	3	7	2	conf.	conf.	conf.	conf.	conf.			conf.		14
Vessels	8	9	5	3	4	5	6	6	3	4	4	3	3	2	3	2	2	2			1		4
Shortraker																							
Catch (mt)	409	92	123	120	66	24	41	conf.	71	2	6	69	1	conf.	conf.	conf.				conf.			60
Vessels	9	9	6	4	3	5	7	3	3	2	2	3	3	1	1	1				1			4
Thornyheads																							
Catch (mt)	438	181	166	151	53	45	34	6	33	2	10	52	8	10	4	1	conf.	conf.	conf.	conf.	conf.	conf.	54
Vessels	9	9	7	5	4	6	7	5	3	4	4	3	3	3	3	3	2	2	2	1	1	1	4
Sablefish																							
Catch (mt)	346	275	348	188	146	101	94	82	101	56	63	66	44	33	137	conf.	conf.	72	62	31	conf.	conf.	105
Vessels	9	9	8	5	4	6	7	5	3	4	4	3	3	3	3	2	2	3	3	3	2	2	4
RPP or RP																							
Pacific cod																							
Catch (mt)								172	127	197	225	164	325	183	136	255	75	conf.	52	101	74	107	148
Vessels								4	4	5	5	5	4	5	4	4	3	2	4	4	4	4	4
POP																							
Catch (mt)						2,936	2,963	3,338	3,207	4,013	3,756	4,504	5,317	6,062	5,692	6,190	5,660	8,029	9,703	11,011	10,409	9,814	6,036
Vessels						7	8	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	5
Dusky																							
Catch (mt)						1,184	583	955	758	1,361	1,166	1,255	1,144	1,151	1,281	1,189	850	900	1,517	1,554	2,676	1,676	1,247
Vessels						5	7	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	4
Northern																							
Catch (mt)						616	627	518	532	1,280	1,075	1,519	1,432	1,265	1,138	1,122	1,107	1,139	1,167	1,109	793	731	1,010
Vessels						6	8	4	4	4	5	5	4	5	4	4	4	4	4	4	4	4	5
Rougheye																							
Catch (mt)						conf.	conf.	84	238	258	268	428	241	321	247	240	287	conf.	140	112	94	90	188
Vessels						2	2	4	4	5	5	5	4	5	4	4	3	4	4	4	4	4	4
Shortraker																							
Catch (mt)						conf.	conf.	23	58	170	183	148	133	102	81	104	86	104	81	75	94	65	91
Vessels						2	2	4	4	5	5	5	4	5	4	4	3	4	4	4	4	4	4
Thornyheads																							
Catch (mt)						conf.	conf.	47	38	44	68	139	161	252	229	208	60	88	58	87	54	21	93
Vessels						2	2	4	4	5	5	5	4	5	4	4	3	4	4	4	4	4	4
Sablefish																							
Catch (mt)						conf.	conf.	126	113	193	175	161	148	128	133	167	168	209	271	336	328	285	179
Vessels						2	2	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	4
Total Catch (mt)	6,329	5,961	6,180	5,900	4,726	5,343	5,207	6,496	6,705	8,639	8,224	9,767	9,728	9,873	9,721	9,658	8,459	10,854	13,454	14,750	14,901	13,141	8,819
Total Vessels	9	9	9	6	5	8	9	8	6	8	8	7	5	6	5	5	6	6	5	5	4	4	7

Source: AKFIN summary of CAS data

Figure 5-3 provides information on the monthly CV catch of the primary rockfish species harvested from the Central GOA trawl RPP and RP fisheries. Before the implementation of the RPP, these fisheries were harvested primarily in July. Under the RPP and RP, they were harvested mainly during May and June to avoid conflict with salmon fisheries. During the pre-RPP years of 2000 through 2006, over 95 percent of each primary rockfish species was harvested during July (except for Pacific ocean perch in 2003). In most years, 100 percent was harvested during July. After the RPP was implemented, from 50 percent to 95 percent of the fishery was harvested in May and June. Typically, less than 20 percent of the fishery is taken in July. Smaller percentages were generally taken in the months after July, depending on the amount of CQ the cooperatives had remaining to harvest. On February 10, 2021, the Council recommended NOAA Fisheries issue an emergency rule to modify the fishing season start date to April 1 for fishing vessels participating in a rockfish cooperative as part of the RP for the 2021 fishing year. About 30 percent of the Pacific ocean perch and Northern rockfish catch was taken in April that year. Dusky rockfish catches were about 5 percent of the annual total. The regulatory change to move the start date to April beginning in 2025 is expected to result in a substantial harvest of these species earlier than allowed under the May start date.

Figure 5-3 CV Catch by month in the RPP of the three primary species



Source: AKFIN summary of NMFS CAS data

5.5 Shoreside Processing

Information reported in the harvest section (Section 5.3) shows the mt of Central GOA primary and secondary species delivered to shoreside processors by CVs. That section also shows the catch of these species by CPs. Refer to that section for information on the number of active CPs.

All offshore processors were CPs over the 2003-2024 period except in 2016 when two motherships reported processing very small amounts of bycatch of the primary rockfish species caught in the arrowtooth flounder fishery. Confidentiality rules prevent those deliveries from being reported as a separate category.

Table 5-10 reports the number of Kodiak shoreside plants (unique counts of Intent to Operate codes) that processed the three primary rockfish species harvested with trawl gear from the Central GOA. Annually, four to nine shoreside plants took deliveries during the years 2003 through 2023. Including just the active plants in the RPP or RP reduces the range of annual plant counts to four to eight. The number of plants has declined from eight in 2010 to four from 2020 through 2023. Reductions in the number of active processing plants directly affect the impacts of processing caps implemented under the RP. These issues are discussed in more detail later in this document.

Table 5-10 Number of Kodiak Shoreside plants that took trawl deliveries of the three Central GOA primary rockfish species, 2003 through 2024.

Open Access	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Average
POP																							
Round (mt)	4,605	4,253	4,330	4,338	348	390	36	528	704	210	270	239	137	468	556	1,166	772	842	500	1,600	1,501	560	1,289
Processors	6	6	6	6	8	7	8	7	8	7	7	7	6	5	5	5	4	4	5	4	4	4	6
Dusky																							
Round (mt)	1,266	1,290	988	939	44	69	10	17	53	32	45	43	27	62	39	37	33	22	35	38	42	17	234
Processors	6	7	7	7	8	6	7	7	8	7	7	7	7	9	7	6	5	4	5	4	4	4	6
Northern																							
Round (mt)	2,743	2,062	1,690	1,720	90	69	15	26	45	41	93	49	64	53	34	45	29	7	2	1	1	1	404
Processors	5	6	6	6	7	7	8	7	8	7	7	7	7	5	5	5	4	4	4	3	3	4	6
RPP																							
POP																							
Round (mt)					4,486	4,497	4,561	5,911	5,549	6,245	6,012	7,059	8,349	9,400	8,259	9,619	10,831	12,200	14,574	11,671	12,758	10,533	8,473
Processors					8	6	6	8	7	7	7	7	7	6	6	5	5	4	4	4	4	4	6
Dusky																							
Round (mt)					1,591	1,608	1,496	1,267	839	2,000	1,487	1,391	1,177	1,802	893	1,514	1,145	889	1,079	830	647	339	1,222
Processors					7	6	6	8	7	7	7	7	7	6	6	5	5	4	4	4	4	4	6
Northern																							
Round (mt)					2,146	1,348	1,294	1,134	866	1,812	1,314	1,651	1,239	1,812	292	794	649	444	457	275	125	10	981
Processors					6	6	6	7	7	6	7	7	7	6	6	5	5	4	4	4	4	4	6
Total Round (mt)	8,614	7,604	7,008	6,997	8,705	7,981	7,413	8,882	8,056	10,340	9,221	10,431	10,993	13,597	10,072	13,174	13,459	14,404	16,646	14,415	15,074	11,460	10,661
Total Processors	6	7	7	7	9	7	8	8	8	7	7	7	8	10	8	7	6	4	5	4	4	4	7

Source: AKFIN summary of CAS data

Note: The two motherships reported to have taken deliveries of the primary Central GOA rockfish species in 2016 were taking deliveries from the arrowtooth flounder target fishery, which had primary rockfish species as bycatch and is not included in this table.

6 Prohibited Species Catch Limits

This section focuses on Central GOA halibut mortality and Chinook salmon PSC by vessels participating in the RP. Data from 2007 through 2024 are included in this section. Data for earlier years are available in the previous program review and program reauthorization analyses incorporated by reference as noted in Table 2-1.

6.1 Chinook Salmon Prohibited Species Catch

Starting in 2015, the RP trawl CVs are limited to 1,200 Chinook salmon each year while checked into the RP. If the RP trawl CVs reach the Chinook salmon limit, directed fishing by all CVs in the RP will be prohibited for the remainder of the year. On October 1, if it is determined that more than 150 Chinook salmon from the RP CV limit will not be caught, the available Chinook salmon limit minus 150 fish can be reallocated for use by CVs in other GOA fisheries.

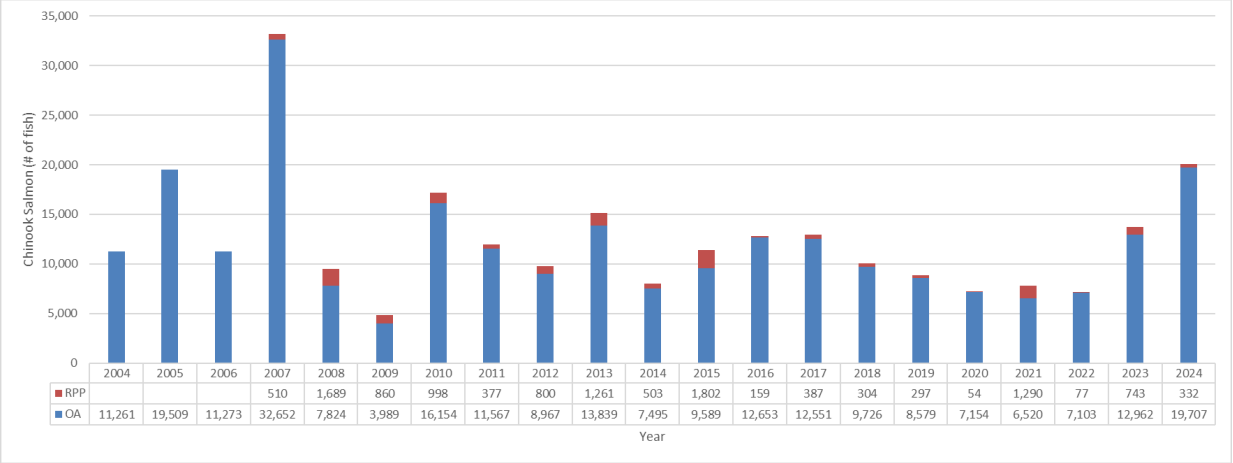
Trawl CP vessels fishing in the GOA are subject to a limit of 3,600 Chinook salmon, or 4,080 Chinook salmon if the previous year's catch of Chinook salmon did not exceed 3,120 fish. This limit applies to all trawl CPs fishing in the GOA inside and outside of the RP. Directed fishing by trawl CPs will be closed in the GOA when that limit is projected to be reached. The trawl CP sector has a seasonal limit before June 1 of either 2,376 or 2,693 Chinook salmon, depending on whether they were allocated additional Chinook salmon due to being under their defined limit the previous year.

In general, Chinook salmon PSC tends to be quite challenging to avoid consistently. Improvements in gear and communication on the fishing grounds have provided some benefits. However, there are still instances where a vessel is reported to encounter relatively high PSC rates when other vessels in the area had not previously realized high rates. Members of the fleet often describe these events as "lighting strikes" since they tend to be difficult to predict and, therefore, avoid.

6.1.1 CVs

Figure 6-1 shows the estimated Chinook salmon PSC taken in the Central GOA RPP, RP, and open-access trawl fisheries from 2004 through 2024. As stated above, a Chinook salmon PSC limit was not implemented for the non-pollock trawl fisheries in the GOA until 2015. Before 2015, CV Chinook salmon PSC in the RP ranged from 377 fish to 1,689 fish. The annual variation is likely due to a variety of factors that include the number of Chinook salmon on the fishing grounds, PSC estimation methods, the use and effectiveness of excluder devices, and communication of encounter rates by harvesters on the fishing grounds. In the years since the RP PSC limit was implemented, both the largest and smallest Central GOA Chinook salmon PSC estimates were reported. In 2015, 1,802 Chinook salmon were reported, and in 2016, the number dropped to 159. Since 2017 the number of Chinook salmon taken in the RP has ranged from a low of 54 fish in 2020 to a high of 1,290 in 2021. The variation is partly due to the complexities of avoiding Chinook salmon and extrapolation methods used to estimate total PSC from basket samples.

Figure 6-1 Chinook salmon PSC (in numbers of fish) in the directed Central GOA RPP CV, RP CV, and open access CV trawl fisheries, 2004 through 2024.



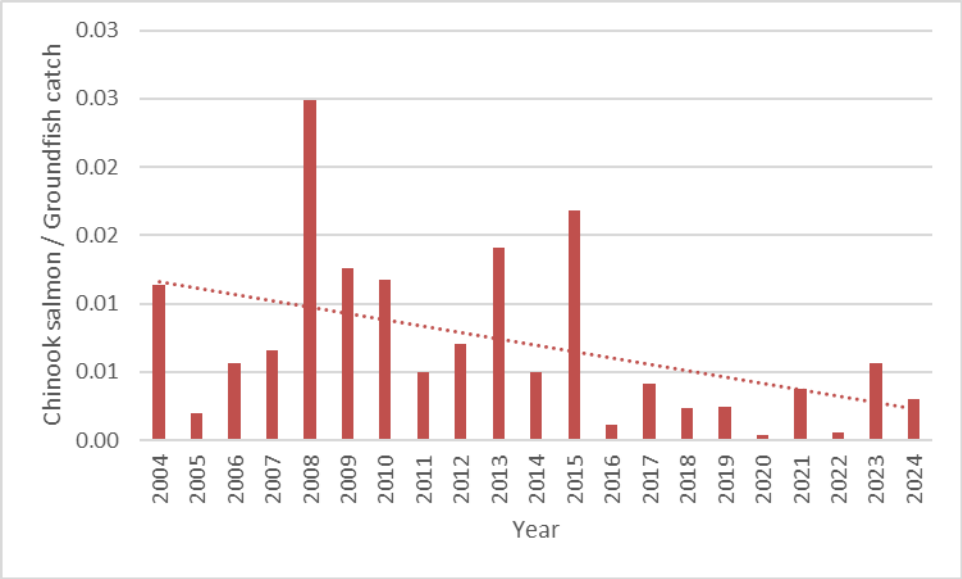
	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP				510	1,689	860	998	377	800	1,261	503	1,802	159	387	304	297	54	1,290	77	743	332
OA	11,261	19,509	11,273	32,652	7,824	3,989	16,154	11,567	8,967	13,839	7,495	9,589	12,653	12,551	9,726	8,579	7,154	6,520	7,103	12,962	19,707

Note: RPP in the legend includes RPP years (2007-2011) and RP years (2012-2024). OA includes open access trawl fisheries in all years (2004-2024).
Source: AKFIN summary of CAS data

During 2015, RP CVs exceeded their limit of 1,200 fish but were well under their limit until November. In May and June, an estimated 684 and 91 Chinook salmon were taken, respectively. The remaining 1,027 Chinook salmon were taken during the last week of fishing in November of that year. High PSC rates reported for the last week of fishing were attributed to the fleet in part based on the basket samples taken from one vessel.

Figure 6-2 shows the estimated annual Chinook salmon PSC rates in the Central GOA trawl rockfish target fisheries. Rates are shown as the ratio of Chinook salmon per mt of total groundfish caught in the rockfish target fisheries. Rates were highest in 2008 and 2015, but relatively low after 2016. A trend line indicates a declining Chinook salmon usage rate in the Central GOA rockfish fisheries. The variability of the Chinook salmon PSC rates highlights the difficulties associated with avoiding Chinook salmon, even when the gear is modified to allow some salmon to escape and the fleet communicates bycatch hot spots in close to real-time.

Figure 6-2 Estimated annual Chinook salmon PSC rates (# of Chinook salmon/mt of total groundfish basis species catch) in the Central GOA rockfish target fisheries, 2004 through 2024



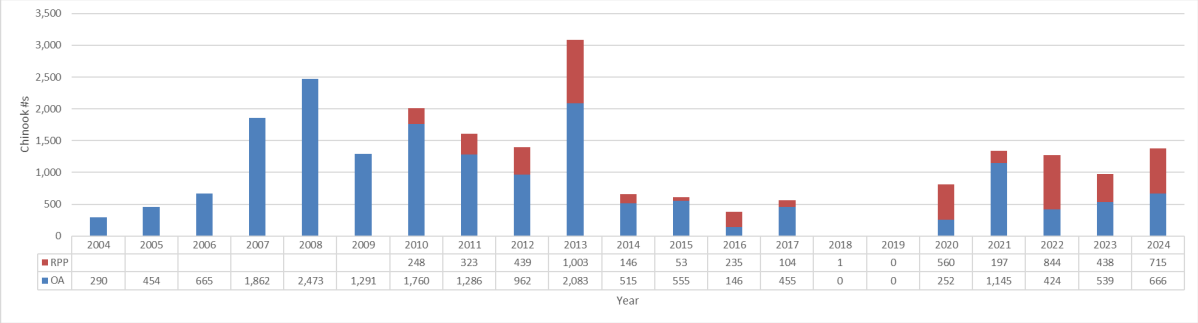
Source: AKFIN summary of CAS data

6.1.2 CPs

Chinook salmon PSC used by the trawl CP sector in the Central GOA has also shown considerable variability. CPs began assigning most of their allocation of primary rockfish species to cooperatives starting in 2010. Before 2010, the data indicates most of the catch is attributed to the open access fishery since the CP LLP licenses were assigned to that fishery and not cooperatives. Figure 6-3 focuses on the reported catch of Chinook salmon PSC in the Central GOA by vessels in the RP, but it is worth noting that the trawl CP sector in limit is either 3,600 fish in non-pollock Western and Central GOA Chinook limit (2015) or 4,080 fish (2016) depending on the PSC usage the previous year, since regulations allow for an increased limit if usage the previous year was below the defined threshold.

Data reported in Figure 6-3 shows that in the Central GOA, trawl CPs had above average Chinook salmon PSC usage in the past three years, but almost no Chinook salmon PSC usage in either 2018 or 2019. Chinook salmon PSC usage in 2013 was greater than any other year in the range of years shown. During 2013, Chinook salmon PSC was relatively large in both the RP and the open access fisheries. CVs also experienced higher than average Chinook salmon PSC that year. However, because CVs and CPs have different fishing patterns and locations, the two sectors may realize different Chinook encounter rates when targeting groundfish.

Figure 6-3 Chinook salmon PSC (in numbers of fish) in the directed Central GOA RPP, RP, and open access CP trawl fisheries, 2004 through 2024.



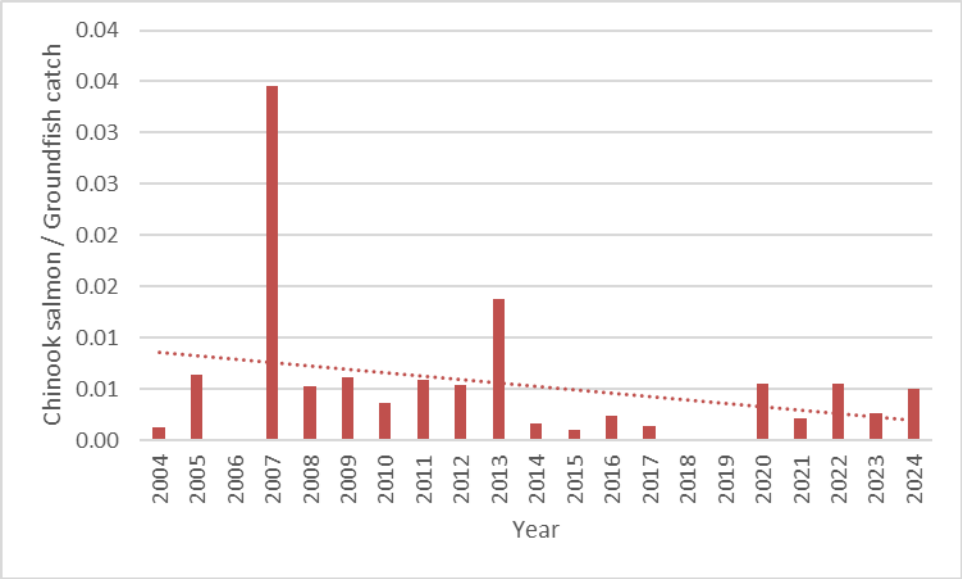
	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP							248	323	439	1,003	146	53	235	104	1	0	560	197	844	438	715
OA	290	454	665	1,862	2,473	1,291	1,760	1,286	962	2,083	515	555	146	455	0	0	252	1,145	424	539	666

Note: RPP in the legend includes RPP years (2007-2011) and RP years (2012-2024). OA includes open access trawl fisheries in all years (2004-2024).
Source: AKFIN summary of CAS data

Chinook salmon PSC usage rates in the Central GOA CP trawl rockfish fisheries are reported in Figure 6-4. While 2007 was the first year of the RPP, most CP sector members did not take part in GOA cooperatives until 2010.

Years when the CP GOA Chinook salmon limit was in place are among the lowest rates reported, especially from 2014 through 2019. Rates since 2020 have fluctuated annually from about 0.01 to 0.005 Chinook per mt of groundfish catch.

Figure 6-4 Estimated annual Chinook salmon PSC rates (# of Chinook salmon/mt of total groundfish basis species catch) in the Central GOA rockfish target CP fisheries, 2004 through 2024



Source: AKFIN summary of CAS data

6.2 Halibut Prohibited Species Catch

Table 5-7 in the previous section provides a summary of the halibut PSC limits set for the RPP and RP. CVs were limited to about 115 mt of halibut PSC under the RPP and 117.3 mt under the RP. The slight increase was a result of a greater percentage of the primary rockfish species being allocated to the CV sector. CPs were allocated between 55 mt and 92 mt in the RPP. The increase in later years was due to more eligible CP LLP licenses being assigned to cooperatives as opposed opting out of the program and fishing in the open access fishery. Under the RP, CPs are assigned 74.1 mt of halibut PSC for use in RP cooperatives.

Over the 2004 through 2016 period, the overall GOA trawl PSC limit decreased from 2,000 mt to the current limit of 1,706 mt. The reduction in the overall GOA trawl PSC limit is a result of reductions implemented as part of the RP and Amendment 95 to the GOA FMP. Amendment 95 to the GOA FMP reduced the trawl and hook and line halibut PSC limits. The trawl limit was reduced from 2,000 mt in 2004 to 1,973 mt under an RP reduction, and then the stair-step down to the current 1,706 mt was made under Amendment 95 to the GOA FMP. The overall trawl limits for the GOA include the amount that is deducted and set aside for exclusive use by the RP participants.

Gear modifications resulted in the fleet using more pelagic style gear to avoid bottom contact. The move to more pelagic style gear, changes in targeting deep-water complex species, and fishing during the time of the year when there are more hours of daylight[17] (Adlerstein, 1991), was mentioned as a potential reason for the reduction in halibut PSC realized by CVs under RPP and RP (North Pacific Fishery Mangement Council, 2011).

6.2.1 CVs

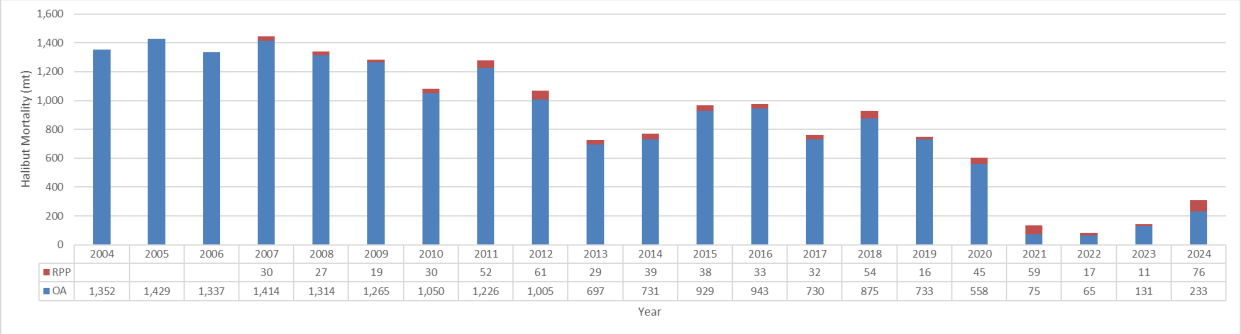
Figure 6-5 shows the mt of mortality of trawl halibut PSC taken by CVs in the RPP, RP, and open-access fisheries. The vast majority of halibut PSC continues to be taken in the open-access fisheries. Halibut PSC in the RPP/RP eras annually ranged between 11 and 76 mt. The least amount was taken in 2023 and the greatest amount was taken in 2024.

Approximately 60 mt of the 2024 RP halibut mortality was attributed to a single trip fall sablefish trip. The observer counted 86.4 kg, of halibut out of a total sample size of 563.18 kg. The extrapolated count applied to all catches equaled about 60 mt of halibut due to the number of unsampled hauls and a high arrowtooth flounder discard rate. The fishing practice for vessels is to fish pollock and then finish harvesting their RP quota (including RP sablefish) is common. The exceptions were in 2022 and 2023, when it was less common due to processors closing early, poor markets, and increased pollock quotas allowing less time to move to RP before the November 15 closure and worsening weather conditions. Stakeholders noted that the Rockfish EM program study has allowed all discarded halibut to be measured by the EM data reviewer, who uses the IPHC area-specific table to estimate the weight of that halibut. EM reviewers can measure every discarded halibut. If the pilot program is successful, it is expected to improve discard estimates.

Halibut mortality attributed to the RPP and RP are generally well below half of the program limits of approximately 115 mt under the RPP and 117.3 mt for the RP. Overall trawl halibut PSC mortality in the Central GOA has shown a general declining trend.

[17] See p. 211 - http://www.iphc.int/publications/rara/1991rara/1991rara04.pdf.

Figure 6-5 Halibut PSC (mt of mortality) in the directed Central GOA RP and open access CV trawl fisheries, 2004 through 2016

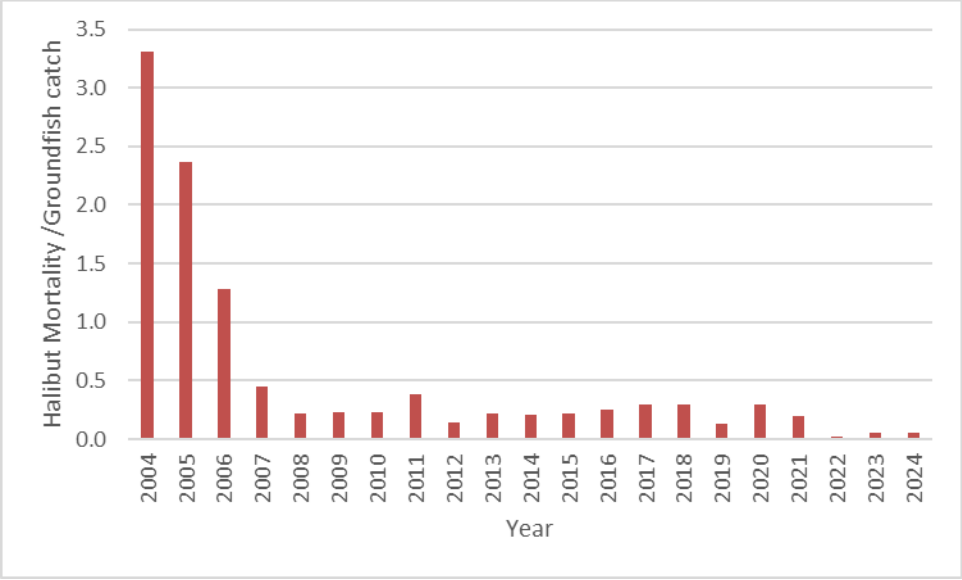


	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP				30	27	19	30	52	61	29	39	38	33	32	54	16	45	59	17	11	76
OA	1,352	1,429	1,337	1,414	1,314	1,265	1,050	1,226	1,005	697	731	929	943	730	875	733	558	75	65	131	233

Note: RPP in the legend includes RPP years (2007-2011) and RP years (2012-2024). OA includes open access trawl fisheries in all years (2004-2024).
Source: AKFIN summary of CAS data

Figure 6-6 focuses on halibut PSC rates in the trawl Central GOA rockfish target fisheries. A trend line was not included in the figure because the decline in rate caused the line to be negative after 2020. Rates are expressed in kilograms (kg) of halibut PSC morality divided by the total catch of all basis species. Halibut PSC mortality rates before the RPP ranged from 1.5 to 3.0 kg of halibut per mt of total groundfish basis species. After the RPP was implemented, the rates decreased to about 0.25 kg of halibut mortality per mt of total groundfish basis species each year. This indicates that the structure of the LAPP, in part, allowed harvesters to implement fishing strategies to reduce halibut PSC mortality rates. These practices seem to be more effective in consistently avoiding halibut than were realized for Chinook salmon.

Figure 6-6 Estimated annual halibut PSC rates (kg of halibut mortality/mt of total groundfish basis species) in the trawl CV Central GOA rockfish target fisheries, 2004 through 2024

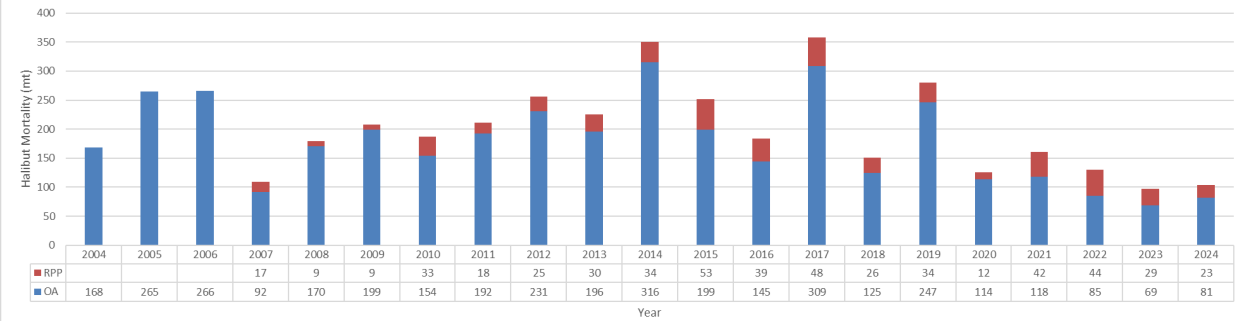


Source: AKFIN summary of CAS data

6.2.2 CPs

Figure 6-7 shows the reported trawl CP Central GOA halibut PSC mortality from 2004 through 2024. Halibut PSC mortality in the RPP was relatively low from 2007 through 2009. Those were years when few CPs assigned their LLP licenses to rockfish cooperatives and catch of CPs not in cooperatives was assigned to the open access fishery. Since 2010, total halibut PSC mortality in the RPP/RP ranged from 12 mt to 53 mt. Mortality was highest in 2015 (53 mt) and was lowest in 2020 (12 mt). Most trawl halibut PSC mortality occurs in open-access fisheries, but reductions have also been realized in those fisheries in recent years.

Figure 6-7 Halibut PSC (mt of mortality) in the directed Central GOA RP and open access CP trawl fisheries, 2004 through 2016

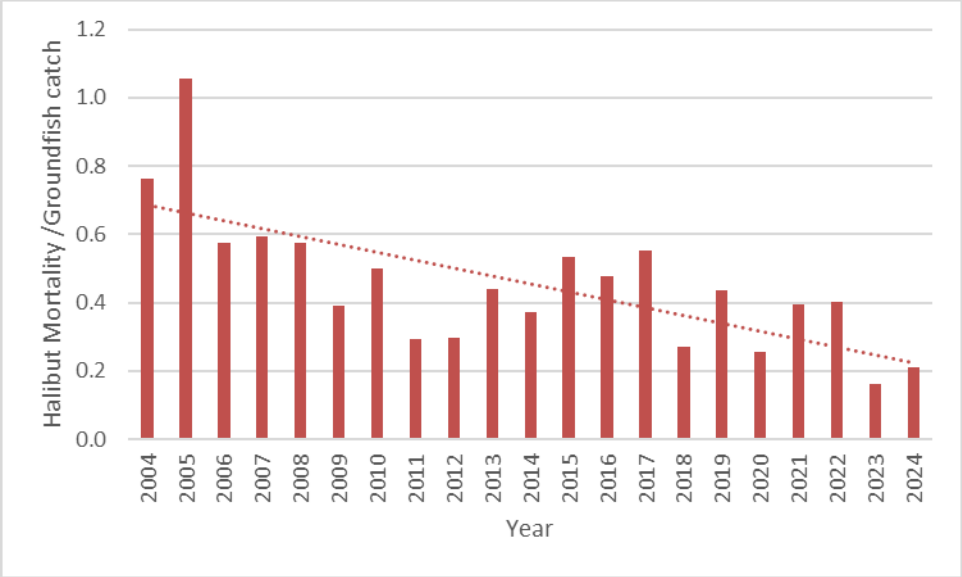


	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
RPP				17	9	9	33	18	25	30	34	53	39	48	26	34	12	42	44	29	23
OA	168	265	266	92	170	199	154	192	231	196	316	199	145	309	125	247	114	118	85	69	81

Note: RPP in the legend includes RPP years (2007-2011) and RP years (2012-2024). OA includes open access trawl fisheries in all years (2004-2024).
Source: AKFIN summary of CAS data

Trawl CP halibut PSC mortality rates in the Central GOA rockfish target fisheries are reported in Figure 6-8. The CPs rates were lower than the CV rates prior to the RPP but tend to be slightly higher after. After the RPP was implemented, the CVs had rates of about 0.3 kg of halibut PSC mortality per mt of total groundfish basis species. The CP rate was closer to 0.4 kg of halibut PSC mortality per mt of total groundfish basis species. In both cases, the rates after the RPP was implemented were lower than rates before the RPP was implemented. The two most recent years had the lowest rates during the period shown. The lower rates may result from changes in the timing of the fishery as well as better communication, gear modification, and secure allocations facilitate the practicability of vessels to making smaller tows and moving fishing areas if bycatch is high.

Figure 6-8 Estimated annual halibut PSC rates (kg of halibut mortality/mt of total groundfish basis species) in the trawl CP Central GOA rockfish target fisheries, 2004 through 2024



Source: AKFIN summary of CAS data

7 Fishery Revenue

Gross fishery revenue in this section is reported in 2023 dollars. The same methods and time series were used to convert nominal values to real values as in the 2023 Economic Groundfish Stock Assessment and Fishery Evaluation (SAFE) documents.

The Personal Consumption Expenditures: chain-type price index[18] was used to estimate the real ex-vessel value and prices. The values account for the change in general US consumption expenditures. The Gross Domestic Product: chain-type price index[19] was used to estimate the real first wholesale value estimates. Wholesale production revenue adjustments account for the change in general US production prices.

This section reports revenue at two levels. Ex-vessel value represents the gross amount paid to CVs by their processor. Gross first wholesale value is the amount received by CPs and shoreside processors from the entities that purchase their products.

When reviewing the information in this section, it is essential to note that changes in value and prices are often driven by market forces outside the RP's control. The prices received by harvesters and processors are affected by various factors related to the supply and demand market forces. In the case of the Central GOA rockfish harvesters, supply is generally determined by the TAC. However, that is not always true given current market conditions where demand is weak and excess supplies of rockfish and substitutes for rockfish exist.

At the first wholesale level, supply is again determined by the TAC and current inventories. First wholesale changes in demand for rockfish can occur due to shifting the demand curve. The demand curve will shift at the first wholesale level from changes in:

- tastes and preferences of consumers,
- consumer's income (along with changes in exchange rates, which make fish seem more or less costly), and
- changes in prices of substitute products (e.g., rockfish from other sources and other whitefish prices), which are also affected by exchange rates.

Processors, like harvesters, may also affect their price if they can supply a higher quality product or more desirable product form or fish sizes to the consumer than its competitors. Since most processors produce the same product at the first wholesale level,[20] differentiating products is difficult. As a result, the other market factors noted above tend to determine the prices that processors receive for their products.

Harvesters before the RPP could have chosen to change markets (processors) at any time if the overall benefits offered by the new processor were determined to be superior. During this period, the harvesters competed for the available TAC and had to fish when the fishery opened in July. The need to fish when the season started limited their ability to negotiate prices with processors if other vessel operators accepted a price and started fishing. Limits in processing capacity also reduced market choices for harvesters. Product quality, delivery timing, conflicts with the salmon fishing season, and historical relationships often affect the choice of processing markets.

[18] https://research.stlouisfed.org/fred2/series/PCEPI

[19] https://fred.stlouisfed.org/series/GDPCTPI

[20] Traditionally processors primarily produce head & gut or whole fish in frozen blocks sold for reprocessing, but some processors have produced small amounts of fillets. Processors are continuing efforts to generate new product forms and markets. Success in these efforts are constrained by the market price for these products and the costs of production to make them.

Under the RPP, the supply of Central GOA rockfish available to a Kodiak-based processor was determined by the owners of LLP licenses who joined the cooperative associated with the processor. Harvesters were linked to the cooperative and associated processor, where they delivered most of their catch during the qualifying years. Harvesters could negotiate prices with their processor, but they eventually would need to settle on a price, or the harvesters and the processor would forgo the value of the fish they were allocated. This limited ability to market fish reduced the ability of a harvester to command higher prices.

The RP allows harvesters to annually determine the cooperative they will join. Under this structure, the harvester can annually market his fish to any processor within the city of Kodiak. In addition, the harvester could retain the flexibility to deliver defined amounts of its catch to another processor under its cooperative agreement. The structure gives the harvesters substantially greater negotiating leverage than either the pre-RPP, where processing capacity limited choices of markets, or the RPP fishery, where historical landings determined the cooperative choice.

The structure of the LAPP changes the bargaining power between harvesters and processors. Linkages between harvesters and processors were controversial when the RPP and RP were developed. While the information in this section does not determine the optimal division of first wholesale revenue between harvesters and processors, it does show trends in how the management structure, at least in part, affected market power and revenue distributions. Discussions with members of the harvesting and processing sectors indicate that both parties support the management structure that has evolved under the RP.

Central GOA trawl harvesters that fish rockfish also typically fish for pollock and/or Pacific cod. Harvesters often deliver their catch to the same processor (market). Because deliveries of various species are not negotiated in a vacuum, competition for rockfish deliveries may be limited by the desire to obtain/retain a market for other fisheries. In other words, a harvester may choose a processor to deliver rockfish based on existing relationships, including markets for these other (often more valuable in terms of total revenue) species.

The management structure does not change the bargaining power of the processors with respect to the downstream buyers to whom they sell their fish. Processors must compete to sell Central GOA RP species in a world market with many substitute products. However, the longer rockfish fishing seasons may allow processors to reduce inventory to better match demand within a year.

Prices and values reported in this section are real 2023 dollar ex-vessel and first wholesale price per pound of catch. Prices reported in the production section are the products' prices, so they are not directly comparable to whole fish prices reported in this section. Price and value data for 2024 were unavailable at the time this document was drafted.

Table 7-1 provides information on value, catch amounts, prices, and counts of vessels and processors by primary rockfish species and sablefish. Sablefish was included because it has historically been a high-value species that is important to the profitability of the rockfish fishery harvesters and processors. Also, since the RPP and RP were implemented, the cooperative allocation of sablefish has allowed vessels in a cooperative to target sablefish. Sablefish and rockfish price decreases since 2019 have played a substantial role in the RP fishery's recent economic difficulties.

Rockfish prices tended to increase prior to implementation of the RPP as shown in previous RP reviews (NPFMC 2017). Real ex-vessel prices have varied over the program's life, but prices were similar in 2006 and 2016 (2015 for first wholesale). Since 2019 both rockfish and sablefish prices have substantially declined in real dollars. Comparing 2019 to 2023 ex-vessel prices, the average Northern rockfish price was 63 percent, dusky rockfish was 43 percent, and Pacific ocean perch was 55 percent of the 2019 price. Sablefish ex-vessel prices in 2023 were about half (52 percent) of the 2019 ex-vessel price.

Several factors caused prices to decline, including reduced demand initially triggered by the COVID-19 pandemic, the strong US dollar, and higher inventory levels. These factors have negatively impacted many commercial fisheries in Alaska and the broader U.S. The structure of the RP has helped to mitigate some of these issues at least in part by increasing efficiency and fishing flexibility, but the RP or any other catch share program structure cannot address all these broader national and global economic issues.

Table 7-1 Central GOA trawl RPP and RP CVs and shoreside processors, catch, and real gross value and prices (in 2023 dollars) for the three primary rockfish species and sablefish, 2007 through 2024

Species/Metric	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Average
Pacific cod																			
Catch (mt)	290	576	478	771	705	796	490	1,368	792	196	52	83	162	121	339	464	261	419	465
Ex-vessel Value (Mil $)	$0.41	$0.88	$0.39	$0.55	$0.65	$0.73	$0.31	$1.11	$0.55	$0.16	$0.05	$0.09	$0.20	$0.11	$0.27	$0.47	$0.19		$0.42
1st Wholesale Value (Mil $)	$0.79	$1.54	$0.91	$1.36	$1.44	$1.49	$0.92	$2.54	$1.29	$0.35	$0.10	$0.22	$0.47	$0.43	$0.75	$1.33	$0.65		$0.98
Ex-vessel Price	$0.65	$0.70	$0.37	$0.32	$0.42	$0.41	$0.29	$0.37	$0.32	$0.36	$0.44	$0.51	$0.56	$0.43	$0.37	$0.46	$0.34		$0.41
1st Wholesale Price	$1.24	$1.21	$0.86	$0.80	$0.92	$0.85	$0.86	$0.84	$0.74	$0.81	$0.84	$1.20	$1.32	$1.61	$1.01	$1.30	$1.14		$0.95
Vessels	27	25	26	27	25	27	29	28	27	27	23	26	27	24	23	20	20	18	25
Processing Plants	8	5	6	7	8	6	7	7	7	6	6	5	5	4	4	4	4	4	6
POP																			
Catch (mt)	4,486	4,497	4,561	5,911	5,644	6,245	6,012	7,059	8,349	9,400	8,259	9,619	10,831	12,200	14,574	11,671	12,758	10,533	8,478
Ex-vessel Value (Mil $)	$2.23	$2.12	$0.92	$2.01	$2.45	$4.56	$3.42	$3.45	$4.19	$4.77	$3.92	$4.87	$5.49	$3.94	$4.57	$4.00	$3.58		$3.56
1st Wholesale Value (Mil $)	$6.27	$6.97	$5.82	$9.93	$12.40	$14.21	$9.70	$9.79	$12.32	$13.81	$14.38	$16.54	$13.42	$13.82	$18.44	$16.35	$16.55		$12.40
Ex-vessel Price	$0.23	$0.21	$0.09	$0.15	$0.20	$0.33	$0.26	$0.22	$0.23	$0.23	$0.22	$0.23	$0.23	$0.15	$0.14	$0.16	$0.13		$0.19
1st Wholesale Price	$0.63	$0.70	$0.58	$0.76	$1.00	$1.03	$0.73	$0.63	$0.67	$0.67	$0.79	$0.78	$0.56	$0.51	$0.57	$0.64	$0.59		$0.66
Vessels	27	27	26	27	25	28	29	28	28	26	24	26	29	27	26	21	22	16	26
Processing Plants	8	6	6	8	8	7	7	7	7	6	6	5	5	4	4	4	4	4	6
Dusky																			
Catch (mt)	1,591	1,608	1,496	1,267	839	2,000	1,487	1,391	1,177	1,802	893	1,514	1,145	889	1,079	830	647	339	1,222
Ex-vessel Value (Mil $)	$0.76	$0.86	$0.65	$0.49	$0.34	$1.45	$0.80	$0.64	$0.55	$0.83	$0.38	$0.71	$0.53	$0.29	$0.33	$0.23	$0.18		$0.59
1st Wholesale Value (Mil $)	$2.34	$2.43	$3.09	$2.38	$2.45	$4.80	$3.25	$2.72	$2.42	$4.33	$2.21	$3.60	$2.21	$1.61	$1.77	$1.57	$0.94		$2.60
Ex-vessel Price	$0.22	$0.24	$0.20	$0.17	$0.19	$0.33	$0.24	$0.21	$0.21	$0.21	$0.19	$0.21	$0.21	$0.15	$0.14	$0.12	$0.13		$0.22
1st Wholesale Price	$0.67	$0.69	$0.94	$0.85	$1.32	$1.09	$0.99	$0.89	$0.93	$1.09	$1.12	$1.08	$0.87	$0.82	$0.74	$0.85	$0.66		$0.96
Vessels	27	35	33	27	25	28	28	28	28	26	24	26	28	27	26	21	21	16	26
Processing Plants	7	6	7	8	8	7	7	7	7	6	6	5	5	4	4	4	4	4	6
Northern																			
Catch (mt)	2,146	1,348	1,294	1,134	866	1,812	1,314	1,651	1,239	1,812	292	794	649	444	457	275	125	10	981
Ex-vessel Value (Mil $)	$1.00	$0.71	$0.30	$0.36	$0.30	$1.31	$0.69	$0.73	$0.54	$0.79	$0.11	$0.33	$0.28	$0.15	$0.14	$0.08	$0.03		$0.46
1st Wholesale Value (Mil $)	$3.16	$2.04	$2.68	$2.13	$2.53	$4.34	$2.87	$3.23	$2.55	$4.36	$0.72	$1.89	$1.25	$0.80	$0.75	$0.52	$0.18		$2.12
Ex-vessel Price	$0.21	$0.24	$0.10	$0.14	$0.16	$0.33	$0.24	$0.20	$0.20	$0.20	$0.18	$0.19	$0.20	$0.15	$0.14	$0.13	$0.12		$0.21
1st Wholesale Price	$0.67	$0.69	$0.94	$0.85	$1.32	$1.09	$0.99	$0.89	$0.93	$1.09	$1.12	$1.08	$0.87	$0.82	$0.74	$0.85	$0.66		$0.98
Vessels	26	27	23	27	25	27	26	26	24	25	24	24	27	23	21	19	20	11	24
Processing Plants	6	6	6	7	8	6	7	7	7	6	6	5	5	4	4	4	4	4	6
Sablefish																			
Catch (mt)	468	395	416	348	351	373	368	319	307	271	293	342	343	421	516	605	505	499	397
Ex-vessel Value (Mil $)	$2.49	$2.35	$2.54	$2.87	$4.03	$3.37	$2.37	$2.40	$2.15	$2.09	$2.68	$1.95	$1.16	$0.78	$2.17	$2.05	$0.89		$2.25
1st Wholesale Value (Mil $)	$3.85	$3.59	$4.10	$3.96	$5.15	$3.92	$3.12	$3.31	$3.12	$3.44	$3.96	$3.51	$2.99	$2.70	$3.65	$4.58	$2.50		$3.61
Ex-vessel Price	$2.41	$2.70	$2.77	$3.74	$5.21	$4.09	$2.92	$3.41	$3.17	$3.50	$4.15	$2.59	$1.53	$0.84	$1.91	$1.54	$0.80		$2.58
1st Wholesale Price	$3.73	$4.13	$4.47	$5.17	$6.66	$4.76	$3.84	$4.71	$4.61	$5.77	$6.13	$4.65	$3.95	$2.91	$3.21	$3.43	$2.25		$4.13
Vessels	26	26	25	27	25	28	27	27	25	26	24	25	27	25	22	21	19	12	24
Processing Plants	7	6	6	7	8	7	7	7	6	6	6	5	5	4	4	4	4	4	6
All Species Total																			
Catch (mt)	9,263	8,809	8,702	10,108	8,871	11,997	10,483	12,625	12,616	14,400	10,378	13,188	13,806	14,665	17,580	14,688	15,106	12,709	12,222
Ex-vessel Value (Mil $)	$7.02	$7.11	$5.01	$6.59	$8.01	$11.74	$7.95	$8.74	$8.25	$9.12	$7.42	$8.29	$7.92	$5.46	$7.66	$7.11	$5.08		$7.56
1st Wholesale Value (Mil $)	$16.73	$17.03	$17.20	$20.61	$24.71	$29.79	$21.02	$22.72	$22.61	$27.89	$22.30	$27.14	$21.31	$20.01	$26.07	$25.50	$21.80		$22.61
Vessels	28	35	33	27	25	28	29	28	28	27	25	26	29	27	26	23	22	18	27
Processing Plants	9	6	7	8	8	7	7	7	7	7	6	5	5	4	4	4	4	4	6

Source: AKFIN summary of CAS and COAR data

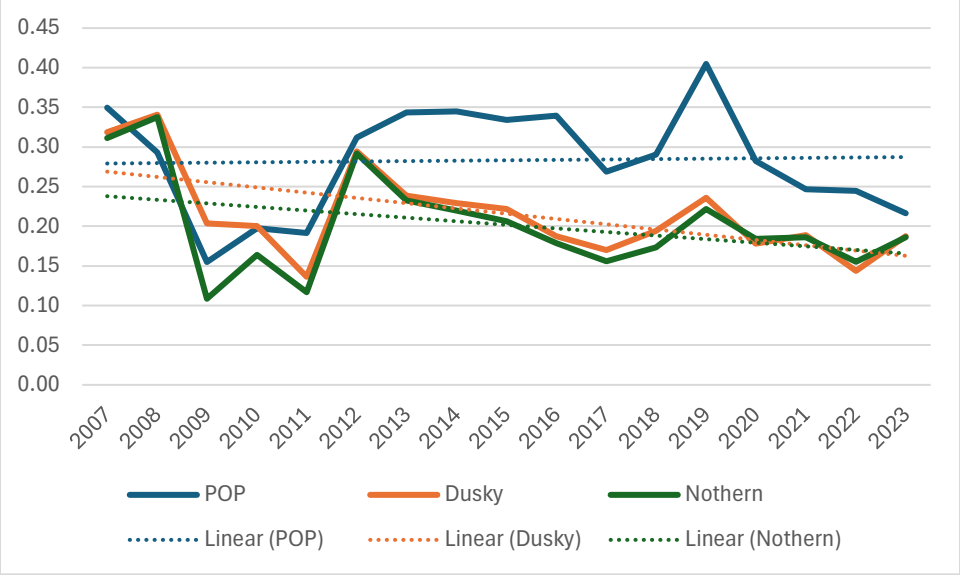
Figure 7-1 provides information on the average annual ratio of ex-vessel to first wholesale value for the three primary rockfish species. The dusky and Northern rockfish ratios tend to track closely with a more sloping downward trend line. Pacific ocean perch's ratio tended to be flatter and higher. Price ratios early in the period and during most of the RPP were lower than the transition period for the pre-RPP/RPP and the RP. Several factors could have influenced the price ratio movement, including the RPP and RP structure. Harvesters and processors were concerned about how changes in the harvester/processor linkage within the cooperative structure would alter bargaining power. Except for 2007 and 2008 the ratio seems to track with the management structure. The 2007 and 2008 period was a time when diesel prices were particularly high. That may have contributed to harvesters being paid a higher percentage of first wholesale prices those years to help offset those increased harvesting costs. A large increase in the ratio occurred in 2019 before subsequently declining. The decline was primarily driven by a reduction in the first wholesale value paid to processors and not an increase in ex-vessel value. The 2018 tariffs imposed on seafood imports/exports to/from China may have partly driven the change in 2019.

The ratio of ex-vessel to first wholesale prices is only an indicator of changes in market power. As noted by the Council's SSC in their minutes from the October 2016 halibut and Sablefish IFQ program review:

> *…the division of revenues between processors and vessels with wholesale and ex-vessel prices, this is not equivalent to tracking the extent to which fishery rents accrue to processors, vessel owners, crew, and quota owners, which is critical to monitoring the extent to which business relationships are maintained, and to which those who are directly involved in the fishery benefit from the IFQ program.*

Information regarding the change in relative values is provided in this section because data are not available for the RP participants to determine the economic rents. Economic data reports collect information on the Amendment 80 fleet whose members comprise much of the RP CP sector, but similar cost data are unavailable for the CV sector.

Figure 7-1 Ratio of ex-vessel to first wholesale primary species values, 2007 through 2023



Source: AKFIN summary of CAS and COAR data

Catch, value, and number of vessels for the CP sector are provided in Table 7-2. The catch of Pacific ocean perch increased from 2,936 mt in 2008 to over 11,000 mt in 2022, before decreasing slightly in

both 2023 and 2024. Dusky rockfish catch increased in 2023 to 2,676 mt, which is more than twice the average for the period, but the real first wholesale value was only about 25 percent above the period's average, indicating the price had declined. Northern rockfish catch and real first wholesale value were less than the period's average in 2023, with the decline in value outpacing the decline in catch. Sablefish catch increased in recent years to the point where the 2023 catch was about twice the period's average, but the 2023 real first wholesale value was less than the period's average. The low sablefish value is likely partially attributable to the small size of fish harvested and the lower value that size fish commands in the market in addition to weak seafood markets overall in 2023.

The total rows include the catch and value derived from all species harvested under the RP. Therefore, the sum of the listed species catches and value is less than the total in most cases.

Table 7-2 CP catch, real first wholesale value (in 2023 dollars), and active vessels for the three primary rockfish species, Pacific cod, and sablefish, 2008 through 2024

Species/Metric	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Average
Pacific cod																			
Catch (mt)				172	127	197	225	164	325	183	136	255	75	20	52	101	74	107	148
1st Wholesale Value (Mil $)		$0.00	$0.00	$0.32	$0.29	$0.44	$0.28	$0.26	$0.55	$0.33	$0.29	$0.58	$0.16	$0.02	$0.12	$0.27	$0.18		$0.26
Vessels				4	4	5	5	5	4	5	4	4	3	2	4	4	4	4	4
POP																			
Catch (mt)	1,558	4,273	3,719	3,338	3,207	4,013	3,756	4,504	5,317	6,062	5,692	6,190	5,660	8,029	9,703	11,011	10,409	9,814	5,903
1st Wholesale Value (Mil $)	$2.12	$5.35	$4.85	$6.17	$8.81	$8.27	$5.57	$7.40	$7.86	$8.16	$9.14	$9.34	$6.27	$7.81	$9.68	$13.57	$11.17		$7.74
Vessels	2	7	8	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	5
Dusky																			
Catch (mt)	404	1,394	821	955	758	1,361	1,166	1,255	1,144	1,151	1,281	1,189	850	900	1,517	1,554	2,676	1,676	1,225
1st Wholesale Value (Mil $)	$0.56	$1.60	$0.85	$1.12	$1.68	$2.46	$1.25	$1.64	$1.77	$1.27	$1.53	$1.35	$1.08	$0.93	$1.38	$1.58	$1.93		$1.41
Vessels	2	5	7	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	4
Northern																			
Catch (mt)	412	1,121	1,212	518	532	1,280	1,075	1,519	1,432	1,265	1,138	1,122	1,107	1,139	1,167	1,109	793	731	1,037
1st Wholesale Value (Mil $)	$0.58	$1.19	$1.28	$0.77	$1.40	$2.35	$1.21	$2.24	$1.96	$1.47	$1.45	$1.55	$1.30	$0.92	$0.93	$1.10	$0.72		$1.32
Vessels	2	6	8	4	4	4	5	5	4	5	4	4	4	4	4	4	4	4	4
Sablefish																			
Catch (mt)		67	29	126	113	193	175	161	148	128	133	167	168	209	271	336	328	285	179
1st Wholesale Value (Mil $)		$0.66	$0.30	$1.41	$1.60	$1.60	$1.53	$1.74	$1.42	$1.61	$1.50	$1.40	$0.99	$0.97	$1.58	$2.01	$1.34		$1.35
Vessels		2	2	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	4
Total																			
Catch (mt)	2,374	6,856	5,781	5,109	4,737	7,043	6,397	7,603	8,367	8,790	8,379	8,923	7,860	10,297	12,710	14,111	14,280	12,612	8,457
1st Wholesale Value (Mil $)	$3.25	$8.94	$7.33	$11.18	$15.85	$18.40	$12.84	$17.32	$17.19	$16.70	$18.46	$17.80	$11.19	$11.96	$16.15	$21.45	$17.30		$ 14.31
Vessels	2	7	8	4	4	5	5	5	4	5	4	4	4	4	4	4	4	4	5

Source: AKFIN summary of CAS and COAR data

8 Products and Markets

This section provides an overview of the GOA rockfish products produced at the first wholesale level by processors that participate in the RP. The data show the product types produced from all gear types combined that fished in the GOA. The data collected do not allow for the information to be refined and presented by gear type used to harvest the fish or by the management area within the GOA, including the Central GOA. Alaska Fisheries Information Network (AKFIN) staff used the comprehensive Shoreside Production Reports (SPR) to generate the data for the GOA which does break out the FMP area. The prices are appended to the processing volume data from the Commercial Operators Annual Report (COAR) and are the same data that are used in the Economic SAFE document.

Data presented in this section also describes the markets that purchase those products. Market information is derived from secondary sources. A section that describes currency exchange rates is also provided.

8.1 Overview of Rockfish Products

Product forms reported in the SPR include detailed product information. To reduce the categories reported and minimize confidentiality constraints, the data were aggregated into more general groupings as shown in Table 8-1. Products listed as surimi or "other/ancillary" are excluded from table as line items later in this section. Those product forms are included in the total rows. The reason those products were excluded as line items is because 1) the number of processors that made those products was too low in many years to allow for data disclosure and 2) volume and value were relatively small. If those products were included in the tables, other product forms would have also had to been masked to allow reporting the total value in each table.

Table 8-1 Rockfish product forms reported

Product grouping	Product code reported in AKFIN summary of SPR data
Fillets	Fillets with ribs, no skin. Meat with ribs with skin removed, from sides of body behind head and in front of tail.
	Fillets with skin and ribs. Meat and skin with ribs attached, from sides of body behind head and in front of tail.
	Fillets with skin, no ribs. Meat and skin with ribs removed, from sides of body behind head and in front of tail.
	and in front of tail, resulting in thin fillets.
	Fillets, skinless/boneless. Meat with both ribs and skin removed, from sides of body behind head and in front of tail.
Head & Gut	Gutted, head on. Belly slit and viscera removed.
	Headed & gutted tail removed. Head removed usually in front of collar bone, and viscera and head removed.
	Headed & gutted, Eastern cut. Head removed just behind the collar bone, and viscera removed.
	Headed & gutted, Western cut. Head removed just in front of collar bone, and viscera removed.
	perpendicular to the spine, resulting in a steak.
Other/Ancilary	Bones. (if meal, report as 32) (ancillary only)
	Chins. Lower jaw (mandible), muscles, and flesh. (ancillary only)
	Heads. Heads only. regardless where severed from body. (ancillary only)
	recovery rate next to it in parentheses.
	Pectoral girdle. Collar bone and associated bones, cartilage and flesh.
	Roe. Fish eggs, either loose or in sacs or skeins. (ancillary only)
	Wings. On skates, side fins are cut off next to body.
Surimi	Surimi. Paste from fish flesh and additives.
Whole or Bled	Bled only. Throat, or isthmus, slit to allow blood to drain.
	Whole fish/food fish.

Source: AKFIN summary of SPR data

Table 8-2 provides information on all shoreside production, value, prices, and processor counts. Other and surimi were included in the total rows but excluded from being reported separately due to confidentiality issues. The first wholesale value of GOA rockfish processed by these processors ranged from $6 million to over $24 million per year, in 2023 dollars. Most of the value was derived from H&G and whole products. However, fillet production value was greater in 2022 and 2023 than it had been since 2013.

Table 8-2 Rockfish first wholesale products and value (in 2023 dollars), 2003 through 2023

Product/Unit	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total*
Fillets																							
Product Weight (1,000 lbs)	2,026	960	632	608	2,059	811	842	835	663	1,189	664	670	537	484	557	293	629	438	812	827	1,117	111	17,653
Price/Lb	2.42	2.65	2.36	2.81	2.64	1.60	3.38	2.44	3.75	4.92	3.38	2.30	2.64	3.72	2.92	2.62	3.91	5.05	3.51	3.91	2.67		3.04
First Wholesale Value ($1,000)	4,896	2,546	1,491	1,707	5,432	1,295	2,846	2,040	2,487	5,854	2,247	1,541	1,417	1,798	1,627	768	2,456	2,212	2,852	3,229	2,976		53,717
Processors	5	6	7	7	8	6	7	7	9	8	8	9	9	8	8	6	7	5	5	5	4	4	15
Head and Gut																							
Product Weight (1,000 lbs)	368	579	2,800	4,535	3,744	4,457	4,307	5,506	5,410	6,785	5,449	6,141	5,855	8,025	5,621	10,389	10,286	9,391	12,875	11,568	8,727	9,939	132,815
Price/Lb	0.99	2.41	1.95	1.81	1.06	1.44	1.43	1.64	2.12	2.12	1.49	1.54	1.58	1.61	2.20	1.76	1.16	0.99	1.20	1.35	1.21		1.51
First Wholesale Value ($1,000)	366	1,395	5,462	8,224	3,980	6,423	6,159	9,029	11,486	14,364	8,126	9,477	9,254	12,894	12,393	18,334	11,977	9,304	15,452	15,665	10,520		200,285
Processors	7	7	9	9	9	9	9	9	10	9	9	8	7	8	7	7	7	6	6	5	5	5	14
Whole/Bled																							
Product Weight (1,000 lbs)	349	3,044	2,887	4,369	1,825	2,424	3,060	4,966	5,649	3,378	6,385	7,192	7,062	12,066	6,577	7,726	5,554	10,733	7,083	2,578	9,368	3,754	114,276
Price/Lb	0.78	0.60	0.86	1.07	1.06	0.86	0.74	0.86	1.14	1.10	0.91	0.77	0.95	0.81	0.69	0.65	0.53	0.53	0.48	0.66	0.68		0.77
First Wholesale Value ($1,000)	274	1,815	2,471	4,657	1,939	2,096	2,261	4,280	6,428	3,700	5,793	5,565	6,707	9,799	4,558	5,029	2,960	5,712	3,379	1,696	6,354		87,472
Processors	5	8	9	9	9	8	7	8	9	9	8	8	8	7	8	5	6	5	4	4	4	4	14
Total (Includes product forms not listed above)																							
Product Weight (1,000 lbs)	3,626	5,118	7,047	9,631	7,642	8,572	8,328	11,501	11,778	11,420	12,504	14,089	13,539	20,672	12,827	18,409	16,476	20,575	20,814	16,035	19,269	14,574	269,823
Price/Lb	1.75	1.22	1.47	1.53	1.49	1.37	1.37	1.36	1.74	2.10	1.29	1.18	1.29	1.19	1.45	1.31	1.06	0.84	1.04	1.32	1.03		1.29
First Wholesale Value ($1,000)	6,355	6,257	10,356	14,716	11,369	11,777	11,382	15,678	20,459	23,989	16,170	16,606	17,440	24,596	18,653	24,131	17,397	17,250	21,708	21,110	19,876		347,275
Processors	7	9	10	10	9	9	9	9	10	10	10	9	10	8	8	7	7	6	6	5	5	5	15

*Total excludes 2024 product weights
Source; AKFIN summary of CAS data

The information reported in the table above indicates that the types of products being produced by processors have not changed substantially over the period shown. Processor representatives indicated that the costs associated with transporting rockfish from Kodiak to fresh markets have been too high relative to prices that they receive to be profitable. The high transportation costs for all but the highest value species delivered to non-road system communities are currently prohibitive to develop fresh markets.

Labor costs are a limiting factor for producing more labor-intensive products. The RPP and RP have made it possible to explore developing higher value markets that can support higher production cost products, but to date processors have not demonstrated success in creating profitable new markets on a large scale.

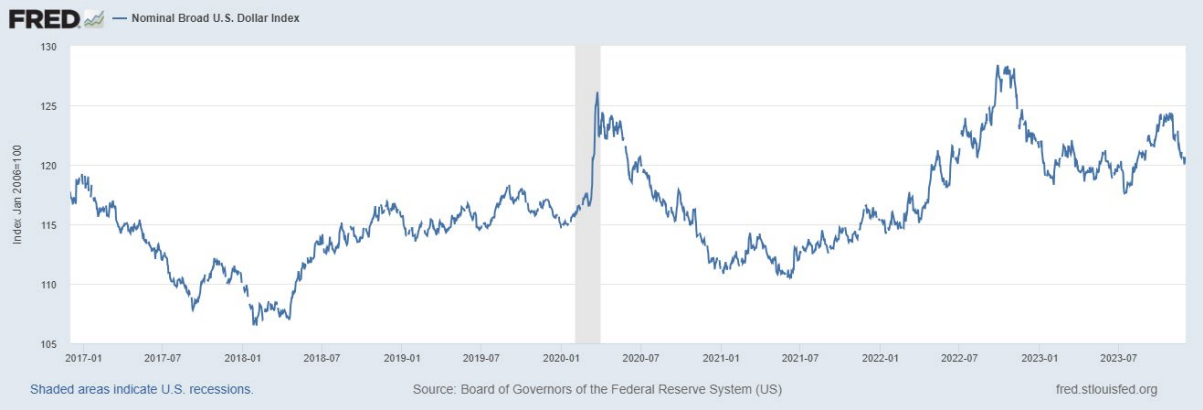
Some processors also noted that they do not differentiate between jig/longline gear catches in markets. Those markets provide opportunities for small boat deliveries if variable costs remain sufficiently low, and market prices are high enough to allow those fisheries to be profitable. Market conditions for all harvesters in these fisheries have been challenging in the most recent years.

8.2 Exchange Rates

Exchange rates impact the cost of U.S. goods purchased by international buyers. When the U.S. dollar (USD) is stronger than a foreign currency, one USD will buy more of that country's currency; conversely, when the USD is weaker, their currency will buy fewer USD. A stronger dollar makes goods produced in the U.S. more expensive for individuals and businesses in other countries purchasing the product. The higher cost can reduce demand for those products in the world market, especially when other countries that supply substitute products have more favorable exchange rates.

A strong U.S. dollar (Figure 8-1) tends to advantage U.S. consumers who purchase imported goods and disadvantage producers who sell products into foreign markets or compete against cheaper imports. The Nominal Broad-Dollar Index measures the dollar's value relative to the currencies most used for U.S. imports and exports. The index reached an all-time high of 128.32 in September 2022. Goods produced abroad and imported to the United States will be cheaper if the manufacturer's currency falls in value compared to the dollar. If the dollar continues to be relatively strong, import prices will likely remain low. Companies based in the United States that conduct a substantial portion of their business outside the U.S. will be negatively impacted as the income they earn from foreign sales decreases in value.

Figure 8-1 Nominal broad U.S. dollar index



Source: Board of Governors of the Federal Reserve System (US), Nominal Broad U.S. Dollar Index [DTWEXBGS], retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/DTWEXBGS, December 6, 2023.

8.3 Overview of Rockfish Markets

NMFS contracted to develop a paper on wholesale market profiles for Alaska crab and groundfish species (Alaska Fisheries Science Center, 2016). Given the changes in groundfish markets in recent years, the results of that paper described in the 2017 RP review are now dated.

NOAA Fisheries has released a new paper focused on the Alaska seafood industry.[21] NOAA economists estimated in that paper that in recent years the Alaska seafood industry suffered a $1.8 billion loss (2022-2023) and a 50 percent decline in profitability (2021-2023).

Key findings in that report that apply to the GOA rockfish fisheries are listed below.

- Higher wages, energy prices, and interest rates increased costs of operation.
- Ex-vessel and first wholesale prices decreased for every major species group including rockfish (see Section 7).
- After the COVID pandemic, retail operational strategies and consumer seafood purchases changed. These changes include how retailers handle/maintain seasonal seafood product inventories, as noted in the following quotes from the report.
    - *Historically, retailers would lower prices to clear inventory. However, strong retail demand for seafood during the pandemic as individuals ate at home was followed by a dramatic decline in that demand as restaurants and schools opened up. This meant that retailers were saddled with high-priced inventory and lower demand.*
    - *Retailers transitioned to keeping supply lower by slowly moving inventory out of cold storage. This practice lowered the seafood supply in the market and kept prices higher, allowing retailers to stay afloat. But it also meant seafood producers, processors, and wholesalers in Alaska demanded a lower quantity of seafood. Retail seafood prices have softened somewhat in 2024, but not by enough to entice consumers to purchase the volumes they bought in 2020–2021.*
- International competition increased and other countries often have lower labor and operating costs, due to lower environmental and labor standards.
- Other factors that were reported to affect Alaska's advantage in fisheries include:

[21] https://www.fisheries.noaa.gov/resource/outreach-materials/alaska-seafood-snapshot

- international trade barriers,
- strengthening U.S. dollar,
- inflation,
- declines in seafood processing jobs and plant closures in the United States,
- lack of revenue insurance for harvesters and processors.

Finally, the report noted that the GOA experienced a decade of ecological and economic challenges. These have led to declining participation and undermined the economic stability and social well-being of fishing communities. The BSAI region has experienced different but similarly scaled ecological changes over the last decade. For example, the total number of active commercial fishing vessels declined by 29 percent in the BSAI from 2003–2023 and the number of active seafood processors declined by 32 percent. In the GOA, these numbers declined by 20 percent and 7 percent respectively.

9 Retention and Utilization

This section examines the retention and utilization of fishery resources during the three periods (pre-RPP, RPP, and RP) considered. Discard rate refers to the percentage of the groundfish catch that is not retained because the fish are unwanted for economic reasons (undesirable size, sex, quality, etc.), or because the fish are required by regulation to be discarded (regulatory discards). Utilization rate refers to the percentage of retained groundfish processed into some type of product.

All primary and secondary species harvested with CQ are required to be retained under the RP. Discards of PSC are not included in this discussion. Halibut PSC is required to be carefully handled to minimize mortality and discarded. Chinook salmon PSC is required to be retained.

9.1 Retention Rates

When the RPP was implemented, it was assumed that changing the structure of the fishery would create economic incentives to reduce discards. Harvesters are allocated a specific amount of primary species and secondary species. All catches of those species are deducted from the cooperative's allocation when fishing under the RP. Because they lose the value associated with that quota if it is discarded, harvesters are expected to try to develop fishing practices that ensure they will derive the greatest value possible.

In addition to the economic incentives, federal regulations require the RP participants to retain all CQ species. These regulations specifically prohibit at-sea discards of Pacific ocean perch, Northern rockfish, dusky rockfish, Pacific cod, thornyheads, and sablefish. Some discards of these species have been reported in circumstances where bringing the fish onboard the vessel would cause safety concerns for the vessel and its crew.

9.1.1 Primary Species

Table 9-1 shows the retention rates of the three Central GOA primary rockfish species. Also included in the table are the amounts of catch that was retained and discarded by whether the catch was taken in the open access fishery or the RPP/RP.

Retention rates in the RPP and RP have been very high, with rates approaching 100 percent for each fishery most years. Retention rates were slightly lower in 2011. That was the only year when reported rates dropped slightly below 99 percent for Pacific ocean perch and Northern rockfish. Dusky rockfish retention rates remained above 99 percent that year.

Retention rates are considerably lower in the open access fisheries. Since the RPP was implemented, the open access fisheries are fisheries where rockfish are not the intended target. The reason for the lower retention rate is likely tied to the quality of the rockfish delivered or the ability of the plant to process small amounts of rockfish that are taken as incidental catch to Pacific cod, pollock, or flatfish target deliveries. Those fisheries are typically prosecuted under race-for-fish conditions (unless a voluntary cooperative can be formed[22]). Processors and their harvesting vessels are concerned about moving those target species off the vessel and through the plant in a timely manner so harvesters can offload as quickly as possible and return to fishing to maximize catch

Retention of dusky rockfish tends to be greater than Pacific ocean perch or Northern rockfish most years under open access. Retention rates overall in the open-access fisheries were highly variable, ranging from

[22] Voluntary cooperatives are typically associated with the GOA pollock fishery but only form when all harvesters agree to join. Voluntary cooperative formation is typically most successful when the alternative would be to not open the fishery because the TAC relative to expected effort is too small for NMFS to manage the fishery.

under 25 percent to over 90 percent, depending on the year and species. The average retention rates over all the years tended to be 5 percent to 15 percent less than those reported for the RPP and RP. Those rate differences would have been greater if the directed rockfish fisheries in 2003 through 2006 had been excluded from the calculation. The exact factors that caused each decision to discard fish are not known with certainty, but as discussed above, they are likely linked to safety issues, the ability of the vessel to market those fish, and the ability of the processing plant to effectively process the small amounts of rockfish mixed in with deliveries of larger amounts of other species.

Table 9-1 Primary rockfish species retention rates by Central GOA open access fishery and RP fisheries, 2003 through 2024 (Sept. 20).

		OA				RPP				Total
Year	Data	POP	Dusky	Northern	Total	POP	Dusky	Northern	Total	
2003	Total (mt)	8,115	2,184	4,807	15,106					15,106
	Retained (mt)	7,215	2,142	4,518	13,875					13,875
	Retention Rate	89%	98%	94%	92%					92%
2004	Total (mt)	8,567	2,063	3,779	14,409					14,409
	Retained (mt)	7,849	2,039	3,611	13,498					13,498
	Retention Rate	92%	99%	96%	94%					94%
2005	Total (mt)	8,051	1,798	3,935	13,784					13,784
	Retained (mt)	7,496	1,788	3,803	13,087					13,087
	Retention Rate	93%	99%	97%	95%					95%
2006	Total (mt)	8,285	1,657	3,981	13,922					13,922
	Retained (mt)	7,541	1,635	3,659	12,834					12,834
	Retention Rate	91%	99%	92%	92%					92%
2007	Total (mt)	2,772	822	924	4,518	4,509	1,590	2,148	8,247	12,765
	Retained (mt)	2,674	817	869	4,360	4,486	1,589	2,146	8,221	12,581
	Retention Rate	96%	99%	94%	97%	99%	100%	100%	100%	99%
2008	Total (mt)	239	53	183	474	7,444	2,781	1,965	12,190	12,663
	Retained (mt)	57	40	67	164	7,432	2,781	1,964	12,177	12,341
	Retention Rate	24%	76%	36%	35%	100%	100%	100%	100%	97%
2009	Total (mt)	505	74	81	660	7,529	2,075	1,923	11,527	12,187
	Retained (mt)	143	61	35	239	7,525	2,075	1,922	11,521	11,760
	Retention Rate	28%	82%	44%	36%	100%	100%	100%	100%	96%
2010	Total (mt)	1,259	182	203	1,643	9,290	2,233	1,660	13,183	14,827
	Retained (mt)	917	177	183	1,277	9,248	2,222	1,652	13,122	14,399
	Retention Rate	73%	97%	90%	78%	100%	99%	100%	100%	97%
2011	Total (mt)	1,533	457	281	2,270	8,999	1,609	1,415	12,024	14,294
	Retained (mt)	900	446	202	1,548	8,851	1,597	1,398	11,846	13,395
	Retention Rate	59%	98%	72%	68%	98%	99%	99%	99%	94%
2012	Total (mt)	485	185	157	827	10,293	3,370	3,100	16,763	17,590
	Retained (mt)	253	88	65	406	10,258	3,361	3,091	16,709	17,116
	Retention Rate	52%	48%	41%	49%	100%	100%	100%	100%	97%
2013	Total (mt)	1,401	244	308	1,952	9,795	2,661	2,392	14,848	16,800
	Retained (mt)	683	107	136	926	9,768	2,653	2,388	14,809	15,736
	Retention Rate	49%	44%	44%	47%	100%	100%	100%	100%	94%
2014	Total (mt)	2,108	160	250	2,518	11,635	2,650	3,174	17,458	19,976
	Retained (mt)	627	102	144	873	11,563	2,646	3,169	17,378	18,251
	Retention Rate	30%	64%	57%	35%	99%	100%	100%	100%	91%
2015	Total (mt)	935	231	284	1,450	13,778	2,325	2,679	18,782	20,232
	Retained (mt)	426	115	148	689	13,665	2,321	2,671	18,657	19,346
	Retention Rate	46%	50%	52%	48%	99%	100%	100%	99%	96%
2016	Total (mt)	2,069	195	229	2,493	15,484	2,957	3,078	21,518	24,011
	Retained (mt)	640	99	76	815	15,462	2,954	3,077	21,493	22,308
	Retention Rate	31%	51%	33%	33%	100%	100%	100%	100%	93%
2017	Total (mt)	4,444	253	157	4,854	13,976	2,174	1,433	17,583	22,437
	Retained (mt)	1,037	114	68	1,219	13,951	2,174	1,430	17,555	18,774
	Retention Rate	23%	45%	43%	25%	100%	100%	100%	100%	84%
2018	Total (mt)	2,331	118	146	2,595	15,828	2,703	1,915	20,446	23,042
	Retained (mt)	1,317	66	77	1,461	15,808	2,703	1,915	20,427	21,888
	Retention Rate	57%	56%	53%	56%	100%	100%	100%	100%	95%
2019	Total (mt)	2,510	180	171	2,861	16,528	1,999	1,756	20,284	23,145
	Retained (mt)	907	38	33	978	16,491	1,996	1,756	20,242	21,220
	Retention Rate	36%	21%	19%	34%	100%	100%	100%	100%	92%
2020	Total (mt)	2,046	80	27	2,153	20,343	1,795	1,589	23,727	25,879
	Retained (mt)	1,071	35	11	1,117	20,229	1,789	1,583	23,601	24,719
	Retention Rate	52%	44%	42%	52%	99%	100%	100%	99%	96%
2021	Total (mt)	1,275	141	36	1,453	24,341	2,603	1,631	28,576	30,028
	Retained (mt)	853	48	15	915	24,277	2,596	1,625	28,498	29,413
	Retention Rate	67%	34%	41%	63%	100%	100%	100%	100%	98%
2022	Total (mt)	2,841	72	32	2,944	22,738	2,394	1,391	26,523	29,468
	Retained (mt)	1,927	48	17	1,992	22,681	2,385	1,384	26,450	28,442
	Retention Rate	68%	66%	52%	68%	100%	100%	99%	100%	97%
2023	Total (mt)	2,589	65	11	2,665	23,311	3,344	923	27,579	30,244
	Retained (mt)	1,694	54	2	1,751	23,167	3,323	917	27,407	29,158
	Retention Rate	65%	84%	21%	66%	99%	99%	99%	99%	96%
2024	Total (mt)	1,193	62	68	1,324	16,984	2,031	746	19,761	21,085
	Retained (mt)	664	21	12	697	16,925	1,999	740	19,663	20,360
	Retention Rate	56%	33%	18%	53%	100%	98%	99%	100%	97%
Average	Retention Rate	72%	89%	89%	77%	100%	100%	100%	100%	95%

Source: AKFIN summary of CAS data

9.1.2 Secondary Rockfish Species

Table 9-2 provides a summary of retention rates for secondary rockfish species in the Central GOA trawl fisheries. Pacific cod and sablefish are also allocated to cooperatives as secondary species. From 2003 through 2006 discards of sablefish exceeded 100 mt in some years and exceeded 250 mt in one year (North Pacific Fishery Mangement Council, 2011). Under the RP (and RPP), discards of these species are generally not permitted by cooperatives, and discard amounts are very small when they occur. Under RP discards of CQ species were required to be documented in the Annual Cooperative Reports.[23] The removal of the cooperative reporting requirement has limited reporting of discards in the report provided to the Council,[24] but these discard amounts remain small because of the retention regulations.

Pacific cod retention has been required since the Improved Retention/Improved Utilization Program was implemented under the provisions of 50 CFR 679.27. Because of the relatively small percentage of the sablefish and Pacific cod TAC allocated as secondary species and the high retention rates, a separate table for those species is not included.

As was reported for the primary rockfish species, retention rates of secondary rockfish species in the RPP and RP are greater than in the open access fisheries. The increased retention rates are due to the same factors discussed in the primary rockfish species section. Unlike the primary species, most secondary species catch is taken by the CP sector. As noted earlier, under the RP the CP sector is allocated 40.00 percent of the shortraker rockfish TAC, 58.87 percent of the rougheye rockfish TAC, and 26.50 percent of the thornyhead rockfish TAC. The CV sector is allocated 7.84 percent of the thornyhead rockfish TAC, but rougheye/shortraker are managed under an MRA that may not exceed 9.72 percent of the TAC.

[23] See page 6 at https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/CoopRpts2016/SOK.pdf

[24] https://meetings.npfmc.org/CommentReview/DownloadFile?p=312ffb4a-7404-4c95-a79e-e6fdfddabad1.pdf&fileName=PPT%20B8%20Rockfish%20Program.pdf

Table 9-2 Secondary rockfish species retention rates by Central GOA open access fishery and RP fisheries, 2003 through 2024 (Sept. 20).

		OA				RPP				
Year	Data	Rougheye	Shortraker	Thornyhead	Total	Rougheye	Shortraker	Thornyhead	Total	
2003	Total (mt)	208	533	597	1,338					1,338
	Retained (mt)	140	502	550	1,193					1,193
	Retention Rate	67%	94%	92%	89%					89%
2004	Total (mt)	85	121	291	497					497
	Retained (mt)	75	118	247	441					441
	Retention Rate	89%	98%	85%	89%					89%
2005	Total (mt)	79	167	257	503					503
	Retained (mt)	68	155	234	457					457
	Retention Rate	86%	93%	91%	91%					91%
2006	Total (mt)	95	229	266	591					591
	Retained (mt)	77	218	220	515					515
	Retention Rate	80%	95%	83%	87%					87%
2007	Total (mt)	138	133	79	349	12	8	52	71	421
	Retained (mt)	66	122	75	263	8	5	48	60	323
	Retention Rate	48%	92%	94%	75%	66%	59%	92%	84%	77%
2008	Total (mt)	117	92	87	295	22	46	72	141	436
	Retained (mt)	71	72	84	227	11	40	58	108	335
	Retention Rate	61%	78%	97%	77%	48%	86%	80%	77%	77%
2009	Total (mt)	44	89	75	208	18	16	52	86	294
	Retained (mt)	37	53	71	161	14	10	42	67	228
	Retention Rate	84%	60%	95%	78%	78%	63%	82%	77%	77%
2010	Total (mt)	72	13	52	137	94	42	87	223	361
	Retained (mt)	57	11	49	117	88	28	81	196	314
	Retention Rate	80%	81%	95%	86%	93%	65%	93%	88%	87%
2011	Total (mt)	79	102	70	251	250	77	91	417	668
	Retained (mt)	56	83	62	200	246	67	79	392	593
	Retention Rate	70%	82%	88%	80%	99%	88%	87%	94%	89%
2012	Total (mt)	50	12	36	97	274	199	91	564	661
	Retained (mt)	43	7	9	60	272	173	81	525	585
	Retention Rate	87%	60%	26%	61%	99%	87%	89%	93%	88%
2013	Total (mt)	39	17	55	111	282	252	145	680	791
	Retained (mt)	37	10	53	101	277	194	132	603	704
	Retention Rate	95%	59%	97%	90%	98%	77%	91%	89%	89%
2014	Total (mt)	60	86	173	318	436	161	197	794	1,112
	Retained (mt)	46	73	171	290	433	155	186	774	1,064
	Retention Rate	77%	85%	99%	91%	99%	97%	94%	98%	96%
2015	Total (mt)	37	21	66	124	251	153	220	624	748
	Retained (mt)	31	15	59	106	250	141	204	595	701
	Retention Rate	84%	72%	90%	85%	99%	92%	93%	95%	94%
2016	Total (mt)	126	202	102	430	326	142	311	779	1,209
	Retained (mt)	21	11	50	83	324	119	294	737	820
	Retention Rate	17%	6%	49%	19%	99%	84%	95%	95%	68%
2017	Total (mt)	40	7	24	70	254	127	288	669	739
	Retained (mt)	32	3	20	55	252	99	272	623	678
	Retention Rate	80%	47%	86%	78%	99%	78%	95%	93%	92%
2018	Total (mt)	130	13	41	184	252	184	308	744	928
	Retained (mt)	23	1	40	64	247	128	259	634	699
	Retention Rate	18%	5%	98%	35%	98%	70%	84%	85%	75%
2019	Total (mt)	89	22	109	220	292	117	95	504	725
	Retained (mt)	81	8	105	194	291	97	87	475	669
	Retention Rate	91%	34%	97%	88%	99%	83%	91%	94%	92%
2020	Total (mt)	33	26	32	92	136	132	113	381	473
	Retained (mt)	30	23	29	82	135	128	108	371	453
	Retention Rate	90%	89%	89%	89%	100%	97%	95%	97%	96%
2021	Total (mt)	13	25	3	41	148	144	83	375	416
	Retained (mt)	12	25	2	39	142	97	76	315	354
	Retention Rate	92%	100%	66%	95%	96%	68%	92%	84%	85%
2022	Total (mt)	45	121	36	202	125	120	126	371	573
	Retained (mt)	36	56	33	125	117	105	110	332	457
	Retention Rate	80%	47%	89%	62%	94%	87%	88%	90%	80%
2023	Total (mt)	26	123	1	150	111	110	77	297	448
	Retained (mt)	25	118	0	143	102	100	74	276	418
	Retention Rate	94%	96%	2%	95%	92%	92%	96%	93%	93%
2024	Total (mt)	9	23	3	35	97	82	53	232	267
	Retained (mt)	7	22	1	30	91	68	47	207	236
	Retention Rate	71%	98%	27%	85%	94%	83%	89%	89%	89%
Average	Retention Rate	66%	78%	88%	79%	98%	83%	91%	92%	86%

Source: AKFIN summary of CAS data

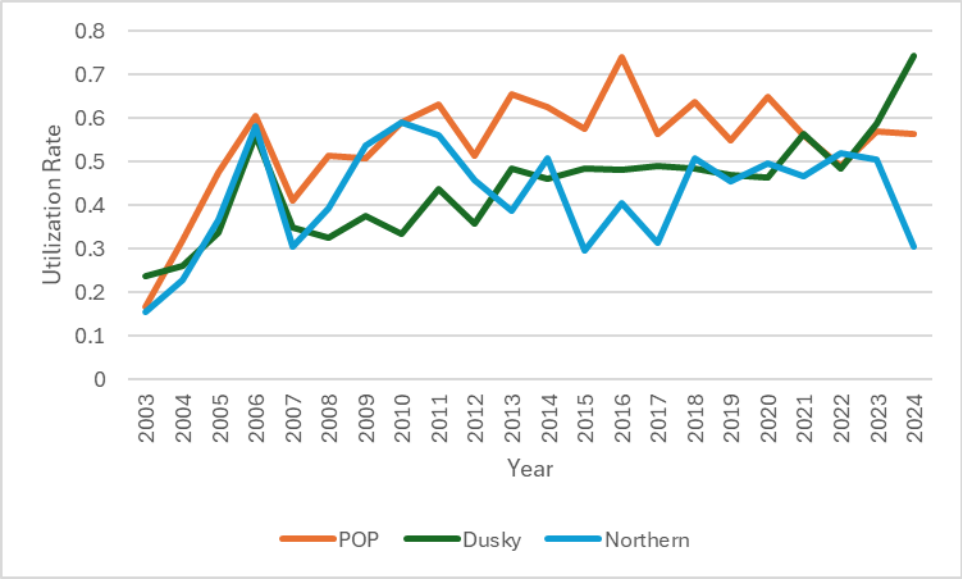
9.2 Utilization Rates

Utilization rates in this section are reported as the ratio of the weight of products produced at the first wholesale level to retained catch. This is one measure of whether processors are selling more of each fish that is retained, on average. One benefit often cited for LAPPs is that they provide the opportunity for improvements in the utilization rates of fish since processors can produce primary products and secondary products that reduce fish waste. However, utilization rates are also highly dependent on the products produced. For example, product recovery rates for rockfish are listed as 0.25 to 0.40 for various types of fillets, 0.50 to 0.60 for head-and-gut products, and 0.88 to 1.00 for gutted and whole fish. In the rockfish fisheries, utilization increases could be realized by making fewer fillets and selling head-and-gut or whole fish. That change increases the utilization rate but is not necessarily a positive outcome since those fish may be sent to another country to be filleted and re-exported.

Utilization rates of the three primary rockfish species processed by shoreside processors that participate in the RP are presented in Figure 9-1.The rates are for all of that species processed at the plant during the year, regardless of the GOA area it was harvested or the gear used to catch the fish. Production data for shoreside plants does not allow a finer breakout for production of only Central GOA trawl caught fish.

Utilization rates increased in the years leading up to the implementation of the RPP, with 2006 having relatively high rates. Rates for all three species declined in 2007. After 2007, dusky rockfish showed a trend of increasing utilization rates over the RPP and RP. Pacific ocean perch utilization rates had an increasing trend through 2016, and a decreasing trend after that year. Northern rockfish utilization rates increased through 2010 but then had a decreasing trend with 2015 rates being like those in 2004. Northern rockfish utilization rates from 2018 through 2023 were like 2014. Production of dusky and Northern rockfish was small in 2024 compared to other years, so caution should be exercised when drawing conclusions about recent trends being predictive of future outcomes based on the figure.

Figure 9-1 Utilization rate of primary rockfish species by RP shoreside processors



Source: AFKFIN summary of CAS data

CP primary species utilization rates of about 0.5 have been reported in previous program reviews for most years and species with little variation between the pre-RPP, RPP, and RP time periods. Because CPs produce primarily head and gut products there is minimal change in the utilization rates reported so a separate figure is not included in this section.

10 Excessive Ownership and Use Limits

Ownership and use caps are imposed to limit the consolidation of QS and CQ among users in the Central GOA rockfish fisheries. When the caps were developed, the Council tried to balance the goals of improving economic efficiency by allowing entities to take advantage of economies of scale relative to protecting other members of the sector, maintaining employment opportunities for vessel crew, and providing financially affordable access opportunities for new participants.

Limits apply to CVs, shoreside processors, and CPs. Changes to these limits implemented under Amendment 113 are described in Section 2.1.5. In summary, those changes eliminated the 30 percent CV cooperative use cap, changed the calculation of the CV use cap from using aggregate rockfish primary species to Pacific ocean perch, and increased the processing use cap from 30 percent to 40 percent. The current caps are as follows:

(1) A rockfish harvester may not hold more than 4 percent of the aggregate rockfish primary species QS assigned to the CV sector. This also limits the secondary and PSC species a harvester may hold since the allocation of those species is based on the amount of primary species QS assigned to the LLP license.

(2) A CV may not harvest more than 8 percent of the CQ of rockfish primary species during a calendar year.

(3) A RP shoreside processor may not receive or process more than 40 percent of the aggregate CQ allocated to the CV sector. As a result, rockfish processors would also be prohibited from receiving or processing more than 40 percent of the three primary rockfish species, Pacific cod, and sablefish.

(4) A RP CP may not hold an amount of primary rockfish species CQ that is more than 40 percent of the aggregate rockfish primary species QS assigned to the CP sector. The program also limits a vessel participating in the CP sector from harvesting more than 60 percent of the CQ of primary rockfish species in the CP sector.

The RP includes a provision allowing persons whose initial allocation of QS and resulting CQ was more than the use caps to retain that amount because it was not considered excessive even though it was more than the desired amount of future consolidation. Processor caps apply to the individual plants, so firms that own multiple qualifying plants could process more than a single plant limit. Changes in ownership of the relevant Kodiak plants are described in the Fishing Communities section. It is important to note, however, that ownership consolidation at the firm level does not impact the amount of RP CQ a plant may receive and process.

10.1 Management of Limits

To monitor the caps NMFS requires harvesters and processors to submit information through annual cooperative applications, cooperative transfer requests, and annual catch reports. NMFS uses the information to enforce the use cap provisions, track primary rockfish species and secondary species CQ use, and discourage rockfish harvesters from entering into corporate arrangements that would frustrate the goal of the use caps.

The cap calculation is based on the total quota used during the year. NMFS defines use as a person having held quota at any time during the year and not the amount harvested or processed during the year. This distinction can impact when a person reaches the use cap if they transfer quota during a year since any quota transferred will accrue against the cap. For example, if person A is allocated an amount of quota during the annual allocation and that person transfers some of the quota to another person, they may not

receive more quota via transfer even if the quota they initially transferred was never harvested/processed by the person that leased it.

With unstable processing and marketing conditions, stakeholders have expressed concern that the current definition of "use" can prevent vessels from changing their plans later in the year and fully harvesting the quota they are otherwise legally able to harvest. Further, the 4 percent use cap can constrain a vessel's ability to even approach or fully harvest their 8 percent Pacific ocean perch vessel harvest cap amount if additional quota may not be transferred into the cooperative due to the use cap.

Finally, stakeholders noted that the use cap disincentivizes smaller cooperatives from continuing to exist and can create competition between cooperative members to lease and transfer more quota into the cooperative, potentially preventing others from transferring quota later if the cooperative's overall use cap has been reached. In challenging conditions, when some vessels cannot afford to operate, and remaining harvesters and processors are trying to achieve optimum yield to provide income and stability for themselves and the community of Kodiak, the use cap creates additional logistical challenges and can prevent available quota from being harvested.

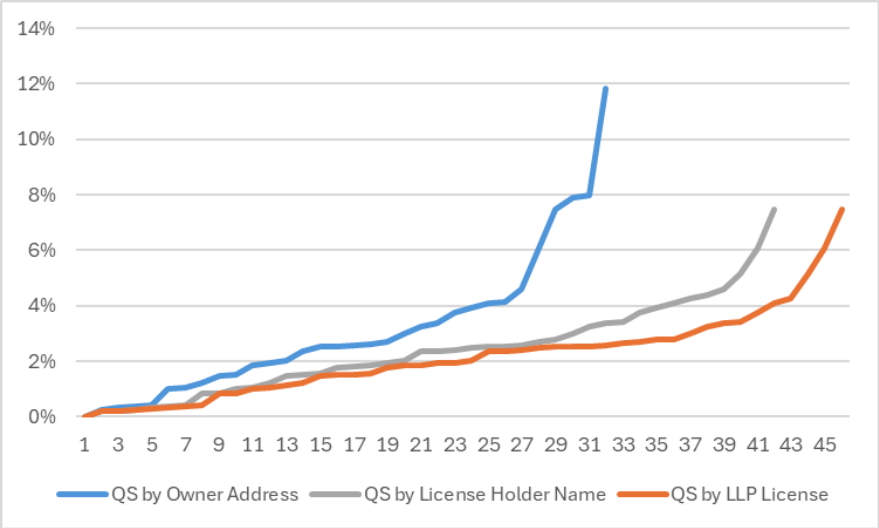
10.2 Ownership Limits

The ownership and use caps appear to have functioned as intended. Minor adjustments have been made to account for the increasing Pacific ocean perch TAC and the under-harvest of the Northern and dusky rockfish allocations. The number of vessels participating in the Central GOA rockfish fishery has been relatively stable and about twice the number allowed if the maximum level of consolidation were to occur.

10.2.1CVs

Harvesters in the CV sector may not hold more than 4 percent of the aggregate primary rockfish species quota unless they were initially issued more than the cap. Figure 10-1 shows the aggregate percentage of primary RP QS assigned to each CV LLP license, LLP license holder, and LLP licenses associated with an address. The figure is based on the current RP quota file listed on the NMFS website. Five of the 46 LLP licenses were initially issued more than 4 percent of the primary species QS. LLP licenses with more than 4 percent of the aggregate primary species QS ranged from 4.1 percent to 7.5 percent of the aggregate primary species QS. Aggregating the QS by LLP license holder name shows that seven of the 42 LLP license holders by name were over the 4 percent cap. When the primary QS is aggregated by the reported LLP license address, eight of the 32 CV LLP license holder addresses are over the 4 percent cap. The remaining 24 addresses were associated with LLP licenses that were under the 4 percent limit.

Figure 10-1 Percentage of primary RP CV QS held by LLP license, LLP license holder, and LLP license holder address at the time of initial allocation



Source: Summary of NMFS reported initial allocation of QS.
https://alaskafisheries.noaa.gov/sites/default/files/reports/initialqsowners.csv

Based on the above information, the LLP licenses with allocations under the cap, assuming away limits imposed on LLP license purchases under other programs, could be purchased by other current participants under the cap. These purchases could occur if the harvester's combined holdings were under the 4 percent limit. However, because the Central GOA rockfish fishery is generally a small part of the LLP license holders annual fishing cycle and the RP QS cannot be separated from the LLP license, the sale and purchase of LLP licenses is only partially driven by rockfish fishery considerations. Participation in the BSAI fisheries and GOA pollock, Pacific cod, and flatfish fisheries are more likely to determine whether an LLP license is sold. If the quota is transferred, annual transfers of CQ are more likely to occur within the cooperative than the sale of the entire LLP license with its associated endorsements.

10.2.2 CPs

Ownership limits are 40 percent of the CP sector allocation. Current QS allocations of primary species to the CP sector indicate that six entities with unique addresses were allocated from 0.66 percent to 39.37 percent of the quota. The information is reported by address because it is a reasonable proxy for ownership information. All firms are under the 40 percent limit.

One of the companies that purchased quota from the Fishing Company of Alaska when it was sold was reported to have adjusted their LLP license holdings to stay under the ownership limit. If the limit were not in place, it is likely that the company would not have divested and would have holdings greater than 40 percent of the sector's allocation. Based on the information available, the limits are functioning as intended, preventing persons from acquiring excessive RP QS holdings. The Council and Secretary defined excessive holdings. Adjustments to the size of the caps are not considered as part of this review since they seem to be functioning as intended. However, if further reductions in the number of participants in the sector occur, the use caps could become a concern.

10.3 CV Cooperative Limits

This limit was removed under Amendment 113, because it was determined to be unnecessary.

10.4 Excessive Harvesting Limits

Harvesting limits are imposed to prevent cooperative members from using excessive amounts of CQ on member vessels and, as a result, reduce the number of active vessels and crew positions in the RP. This section does not report information for individual vessels, but a general catch description is provided, focusing on whether entities have exceeded the limits.

10.4.1CVs

Under current regulations, a CV may not harvest or use more than 8 percent of the Pacific ocean perch CQ issued to the CV sector; under the past regulations, a vessel was not allowed to harvest more than 8 percent of the aggregate primary rockfish CV quota. No vessels were exempted from the 8 percent use cap (North Pacific Fishery Mangement Council, 2011)[25] and no vessels have exceeded the limit since the RP was implemented.

Three or fewer vessels have reported primary species catch data that approached the cap during a year. These vessels, and potentially others, may find the cap constraining and would increase their catch within the cooperative if the limit were not in place. Because of the fishery's economic difficulties in 2023, the annual cooperative report[26] noted that no vessels were constrained by the vessel harvest cap. Markets, price, and a lack of participation in the fall fishing seasons were identified as the primary factors.

The purpose of the vessel cap was to ensure that the harvest of primary species by individual vessels does not exceed the specified threshold and, indirectly, requires that a minimum number of vessels remain active in the rockfish fisheries. At the 8 percent cap, a minimum of 13 vessels could be used to harvest the allocation of primary rockfish species. As shown in Table 5-8, the number of CVs active in the fishery has declined to as few as 21 vessels in recent years. This is a decrease from the 29 vessels that had participated in some years. So, while the cap may limit the activity of certain vessels in some years, other economic and political forces have limited concentration of catch by the fleet overall. If economic conditions worsen and fewer vessels are active in the fishery the 8 percent vessel limit may become more constraining, since the 8 percent cap requires a minimum of 13 active vessels to fully harvest the allocation.

10.4.2CPs

A CP may not harvest or use more than 60 percent of the cooperative quota issued to the CP sector. Catch data for the CP sector indicates there are typically about four or five vessels active in the fishery. A vessel has never reported catch that exceeded the 60 percent use cap.

The use caps for the CP sector appear to be functioning as intended. The use cap would allow as few as two vessels to harvest the entire allocation. So, about twice as many vessels participate on an annual basis as would minimally be required under the use caps.

10.5 Excessive Processing Limits

Shoreside processors have historically been limited to not receiving or processing more than 30 percent of the CQ issued to the CV sector. Declining numbers of active shoreside processors in Kodiak resulted in the limit being increased to 40 percent to ensure the RP allocation could be processed in the community.

[25] See page 123

[26] https://meetings.npfmc.org/CommentReview/DownloadFile?p=312ffb4a-7404-4c95-a79e-e6fdfddabad1.pdf&fileName=PPT%20B8%20Rockfish%20Program.pdf

While no processors exceeded the 30 percent limit imposed under the RP, the newer 40 percent cap ensures that, if needed, three or more Kodiak shoreside processors will be able to take deliveries of RP CQ catches sufficient to process the entire allocation (rather than a minimum of four that were required to do so under a 30 percent limit). Shoreside processors in the RP are defined based on the Federal Processing Permits issued to a plant, meaning that the processing limit is enforced at the plant level and not at the firm level. As result, it would be possible for a single shoreside processing firm to process more than 40 percent of the CQ issued to the CV sector if it were to acquire ownership of multiple eligible Kodiak shoreside processing plants.

The cap was intended to maintain a distribution of processing activity among several processors, which might benefit employees of those plants and provide competition for delivery markets. In addition, the cap could help stabilize the processing sector, particularly since a Kodiak landing requirement is part of the program. Factors outside of the control of the RP have decreased demand for rockfish deliveries, and it has been reported that the overall whitefish market conditions have made it difficult for many past participants to remain viable in the rockfish fishery. Additional information on the active shoreside processors is provided in Section 5.4.

11 Sideboard Limits

A LAPP provides economic efficiencies to harvesters by allowing them to determine the most beneficial times and places to fish. Harvesters' ability to change behavior, unless constraints are placed on them, could utilize those efficiencies to increase their participation in other fisheries. This may result in persons who traditionally participate in those other fisheries but are not part of the LAPP being adversely affected.

Sideboards limit the total amount of catch in other groundfish fisheries that can be taken by eligible LAPP harvesters to historic levels but do not provide guaranteed harvest privileges for a specific amount of fish. Sideboard limits are not used as a management tool in open-access fisheries since all the participants compete to harvest a portion of the available catch limit under similar rules.

RP sideboards apply to federally permitted vessels fishing in federal waters and waters adjacent to the Central GOA when the harvest of rockfish primary species by that vessel is deducted from the federal TAC. Sideboards limit both the LLP license with rockfish QS assigned to it and the vessel used to make legal landings of rockfish QS.

RP sideboards are in effect from July 1 through July 31. Sideboard measures are in effect only during the month of July when the Central GOA rockfish fisheries were traditionally open, and vessel operators had to choose between fishing in the Central GOA rockfish fisheries and other fisheries that were open to directed fishing.

11.1 CVs

Under the RPP, CVs had small sideboard limits in the West Yakutat District for pelagic shelf rockfish and Pacific ocean perch. Those limits are shown in Table 11-1. RPP CVs were prohibited from fishing for the three primary rockfish species in the Western GOA during July. Under the RP, CVs were prohibited from fishing for the primary rockfish species in the West Yakutat District and Western GOA during July. Prohibiting fishing in the West Yakutat District, as opposed to setting small sideboard limits, eased the management burden associated with monitoring CV sideboards and reduced the observer coverage and costs associated with sideboard fisheries for the CV sector since they would not be under the 100 percent coverage requirement in those sideboard fisheries.

CVs that were in the entry-level trawl fishery were not given an allocation of Central GOA rockfish and were not subject to the sideboard limits. The entry-level fishery allowed vessels to harvest up to 2.5 percent of the Central GOA primary species allocated under the RPP and fish in the limited access fishery in the West Yakutat District. Entry-level vessels fishing in the West Yakutat District caught well over the sideboard limit some years during the RPP.[27] The RP eliminated the entry-level trawl fishery program and gave vessels with participation during the qualifying years an allocation of Central GOA primary rockfish and included them in the sideboard limits developed under the RP.

Table 11-1 CV sideboard limits in the West Yakutat District

RPP % of TAC	RP % of TAC	Species	2007	2008	2009	2010	2011	2012 - Current
West Yakutat District CV Sideboards								
1.7%	0%	PSR	5	4	4	7	7	Prohibited from directed
2.9%	0%	POP	33	32	32	58	56	fishing during July

Note: RPP (2007 through 2011) sideboard limits are for the CV sector. Sideboard limits in the Western GOA were prohibitions on directed fishing and were not set as a percentage of the TAC.

[27] The actual amount of catch cannot be reported because four or fewer vessels fished in these fisheries.

The RP also prohibited CVs from directed fishing in any target fishery in the deep-water complex in the month of July (except for Central GOA Rockfish). This limitation prohibits CVs from directed fishing in the arrowtooth flounder, deep water flatfish, and rex sole fisheries from July 1 through July 31. These restrictions were implemented to limit the ability of CVs in these fisheries because they had not historically harvested these species in July. As a result of this sideboard RP CVs are limited to fishing species in the shallow-water complex during the month of July.

Two exemptions from sideboards were included under the RP. The first applies to CVs and LLP licenses that applied to be permanently exempted from the RP and choose not to receive rockfish QS for which they would have otherwise qualified. During the analysis of the RP alternatives at least one vessel operator and LLP license holder who had limited participation during the qualifying years for the RP but was active in the West Yakutat District and Western GOA Rockfish fisheries and, to a limited extent, other flatfish fisheries, wanted to take advantage of this provision. The second exemption was carried over from the RPP and is specific to AFA CVs that are subject to AFA sideboard limits. These vessels were exempted because the Council believed the CVs did not need further limits since it determined that AFA sideboard limitations effectively constrained AFA CVs from expanding their ability to harvest in other fisheries. Adding additional sideboard limits was determined to be duplicative and unnecessary.

The sideboard limits imposed under the RPP and RP have been effective at limiting spill-over effects associated with vessels that were given an allocation of QS. Under the RPP, sideboard limits were more difficult to manage since NMFS needed to determine whether the sideboard limit would support a directed fishery. In years that it could, given the expected effort, NMFS would need to monitor the fishery, project a closure date, and issue a closure notice. Under the RP, NMFS does not need to determine if a directed fishery for sideboard limited vessels should be opened for the three primary species in the West Yakutat District. Each year, LLP licenses that are issued QS and their associated vessels are prohibited from directed fishing in any target fishery in the deep-water complex. That method provides a straightforward management tool and achieves the desired objective.

The specific amounts of catch in the sideboard fisheries cannot be reported because fewer vessels reported landings than would be needed to make the data non-confidential. However, for many years, no sideboard catch of primary rockfish species catch was reported, and during the RPP years, either no catch was reported, or the amounts were minimal.

11.2 CPs

The RP included CP sideboard limitations to minimize potential adverse competition on non-RP participants, potential conflicts among rockfish CP cooperatives in the Western GOA[28] and West Yakutat District rockfish fisheries, and potential conflicts with GOA flatfish harvesters. Sideboard limits were not set for rockfish species other than Northern rockfish, Pacific ocean perch, and dusky rockfish in the Western GOA and West Yakutat District because those species were not traditionally harvested in July so additional management measures were determined not to be needed. Because the Amendment 80 sideboard limits are set for all GOA species harvested by those vessels, the need for additional sideboard limits beyond the primary rockfish species and halibut PSC was mitigated. Because the RP sideboard limits for the Western GOA were removed from regulations in 2021 and the West Yakutat sideboard limits cannot be reported under confidentiality rules, an updated table for CP sideboard harvests is not presented.

The RP also established a sideboard limit on the amount of halibut PSC that could be used in July. The halibut PSC sideboard limits are based on historical halibut PSC usage during July, excluding halibut

[28] The Western GOA sideboard limitations for CPs were removed when Amendment 111 went into effect on March 1, 2021.

PSC used in the Central GOA rockfish fisheries. Halibut PSC sideboards were established for shallow-water species and the deep-water complex. The percentage assigned as a sideboard limit was based on the annual average halibut PSC used by vessels with LLP licenses subject to the sideboard limit during July from 2000 through 2006, excluding the PSC taken in the Central GOA rockfish fisheries, relative to the total available. Using that method to calculate the sideboard limit, the CP sector's PSC deep-water complex limit was set equal to 2.5 percent (43 mt) of the 1,705 mt GOA halibut trawl PSC limit. The CP sector's shallow-water halibut PSC limit was set equal to 0.1 percent (2 mt) GOA trawl PSC limit established in the 2025 harvest specifications. The small PSC sideboard limit for the shallow-water complex prevents participation in fisheries subject to that limit.

CPs fishing under a CP LLP license with QS that decided to opt-out of participating in a rockfish cooperative were prohibited from directed fishing in any of the primary rockfish fisheries in the Central GOA during the entire year. Those vessels were also prohibited from directed fishing in any GOA groundfish fishery from July 1 through July 14, in which that vessel or LLP license does not have prior participation, except fixed gear sablefish. Fishing in the first two weeks of July is prohibited because participants historically participated in the rockfish fisheries during that time.

The sideboard restrictions that have been implemented under both the RP and Amendment 80 program have been effective in limiting spillover effects in the primary rockfish fisheries. Competition for the sideboard limits within the sector has typically been addressed in the cooperative fishing plan that details the timing and prosecution of the sideboard fisheries. If the fishing plan does not define how the fishery will be prosecuted, members of the sector could compete to harvest the available allocation.

12 Overview of Changes in Ownership

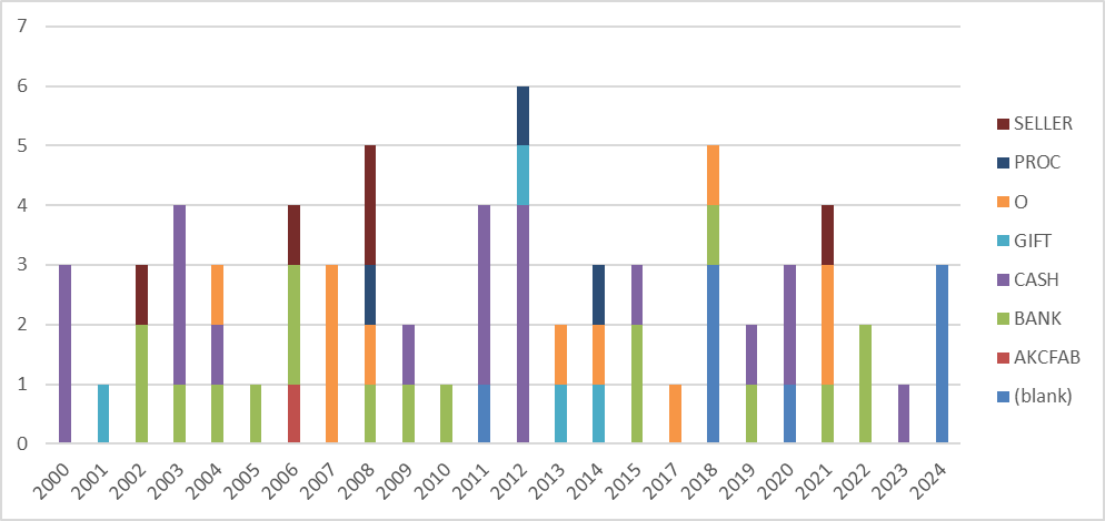
QS holding in the RP are based on ownership of LLP licenses with qualifying catch history. To consider ownership changes in the RP, LLP license transfers reported to NMFS Restricted Access Management Division (RAM) were reviewed for the years 2000 through 2024.

12.1 CV Sector

Figure 12-1 reports the groundfish CV LLP license transfers. Transfers each year are broken out by the reported primary finance method used to complete the transfer. When the transfer was reported as using "O" other or "gift" as the primary financing method, the sale was typically not an arms-length transaction. Those transactions often transferred the LLP license to reorganize the structure of the company that held the LLP license or to transfer the LLP license to a friend or family member. All three transactions reported for 2024 are listed as "blank" for the funding method. No information on the value of the transfer or how it was financed was reported in the data. "PROC" in the figure means the transaction was financed by a processor. "AKCFAB" is the Alaska Commercial Fishing and Agriculture Bank.

Also, note that no LLP license transfers were reported for 2016. That year is not included in the figure.

Figure 12-1 CV LLP license transfers by primary finance method, 2000 through May 2017

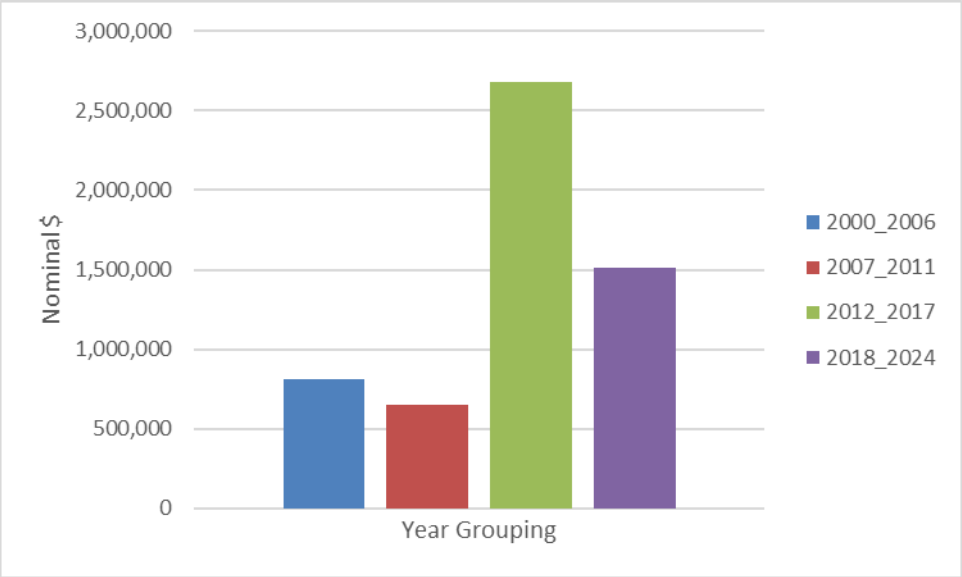


Source: AKFIN summary of NMFS RAM transfer data

In the years immediately following the implementation of substantive amendments to the RP, the number of transfers tend to peak but still remain few in absolute terms. Uncertainty associated with the outcome of changes to the program likely hinders sales that are being considered in the year or years before implementation. When the program was implemented, buyers and sellers could better assess the value of the LLP license and create a market more conducive to trading.

Figure 12-2 shows all reported transfers by the average price reported during the period. Individual prices cannot be reported due to confidentiality restrictions on the data. Instead, prices are reported as an average for the period, excluding transactions where no price was reported, or the reported price was $0.

Figure 12-2 Average transfer price by grouping of years



As expected, deriving meaningful information from the reported LLP license prices is difficult. Several factors that influence the sales price, including the amount of fishing quota and fishing endorsements attached to individual LLP licenses. Not all transactions are at arm's length, which may also distort the market price. Finally, the sale may include other items (e.g., vessels), inflating or obscuring the actual market prices of the LLP license and its RP QS.

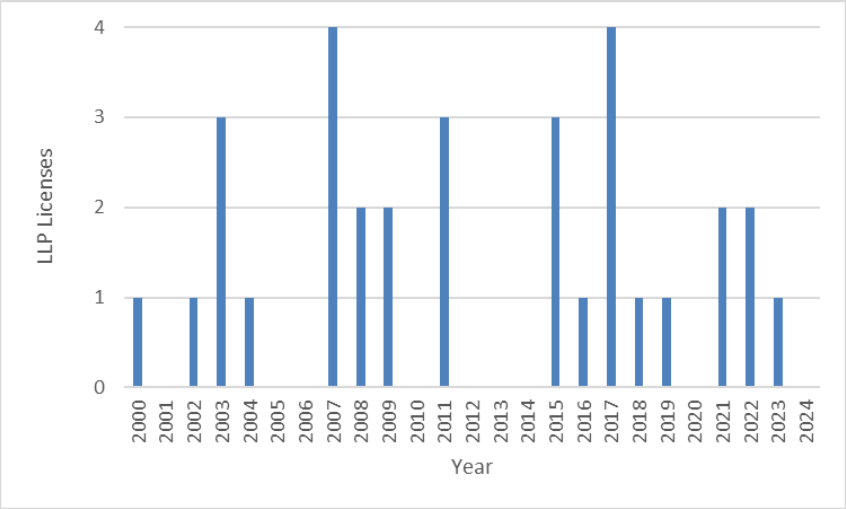
12.2 CP Sector

Nine unique CP LLP licenses were transferred 32 times from 2000 through 2024. All reported transfers are shown in Figure 12-3. The reasons reported for the transfers were:

- 18 of the transfers were part of restructuring a business that retained the LLP license or moving a license to another vessel owned by the company;
- Two transfers were due to either a court order or foreclosure;
- Two transfers were the sale of the business; and
- 10 transfers did not report the reason.

A sales price was reported for just six of the 32 transfers. Of the reported values, the largest value was about 95 times greater than the smallest. Due to the limited number of transfers and the divergent values of sale, information on the average sale value is not reported.

Figure 12-3 CP LLP license transfers, 2000 through 2024



Source: AKFIN summary of NMFS RAM LLP license transfer data

12.3 Shoreside Processing Sector

Past changes in the Kodiak-based shoreside processing ownership were described in the 2017 RP Review. That information was based on a report developed for the GOA Trawl Bycatch Management Program (Northern Economics, 2016). A major change during that period was Trident Seafoods' construction of the new Kodiak Near Island (KNI) plant that became operational in the summer of 2015 and the acquisition of the former Alaska Fresh Seafoods and Western Alaska Fisheries plants in 2014 and 2015, respectively. That paper also noted that Silver Bay Seafoods had purchased some ISA assets, but none were directly related to the RP. Since the last RP review Kodiak-based shoreplant ownership has continued to be relatively unstable, as detailed in Section 13.4.1.2.

Increased vertical integration was anticipated as a possible outcome when the harvester/processor linkage was removed under the RP. At the harvesting and first processing level in the Central GOA rockfish fishery, vertical integration can occur either by more of the fishery being harvested by CPs, shoreside processors buying LLP licenses that are assigned rockfish QS and fishing the quota on CVs owned by the firm, or CV and/or LLP license owners being the owner of a shoreside processor. None of the LLP licenses associated with the same address as a shoreside processor have been reported to be transferred since the RPP/RP was implemented. Information on which vessel owners are also part of a processor's ownership group is unavailable. The regulations implemented as part of the RP that prohibit the transfer of quota from the CV sector to the CP sector effectively limit increased vertical integration that could have resulted from quota being moved to the CP sector.

The RP allocated most of the TAC to the inshore sector. That shift between sectors reduced the vertical integration of up to 16 percent of the primary and secondary species TACs, since it was moved from vertically integrated CPs to the inshore sector. Some inshore CVs are closely associated with processors (through ownership or control), so the decrease in vertical integration is less than 16 percent.

The CV transfer data indicates that three of the LLP license transfers were primarily financed by a processor (Figure 12-1). Those transfers occurred in 2008, 2012 and 2014. The transfer data does not indicate any level of control beyond the source of financing. In each case the reason listed for the transfer was the retirement of the CV LLP holder. No processor-financed transfers have been reported after 2014. Based on that information it does not appear that excessive vertical integration has occurred in the inshore sector.

13 Fishing Communities

Among the analytic documents incorporated into this analysis by reference (Table 2-1) are two comprehensive social impact assessments (SIAs), one for the previous Central GOA RP Review (2017) and one for the more recent Central GOA RP Reauthorization (2020). The scope of the SIA component of the current program review (this fishing community section) is much narrower. It focuses primarily on what has changed (or has not changed) at the community and regional level since the 2020 Central GOA RP Reauthorization analysis, particularly with respect to outcomes relative to the program elements that were designed as, or have served to function as, community and regional protection measures. No new fieldwork was conducted as a part of this analysis, but local knowledge was sought through phone and email contacts building upon previous efforts and has been incorporated into the qualitative analysis in this and other report sections as relevant.

Specifically, this fishing communities section is organized into four subsections, including: a regulatory context summary (Section 13.1); a summary of social/community impact findings contained in earlier reviews of the RPP and the RP; (Section 13.2); an overview of changes in regional and community quantitative indicators of fishing community engagement in and dependency on the Central GOA RP fisheries focused on the years since the most recent previous program review (Section 13.3); and a concluding section on community and social outcomes related to RP elements that were designed as, or have served to function as, community and regional protection measures (Section 13.4).

13.1 Regulatory Context Summary

This program review is an informational analysis rather than an analysis of potential management actions that would satisfy the analytical requirements to implement FMP or other regulatory amendments. As such, this social and community regulatory context summary, requested following the public review of the proposed workplans for earlier program reviews, is presented as background information should the Council subsequently choose to consider amending the GOA Groundfish FMP or Central GOA RP elements potentially involving social, community, and Tribal impact considerations.

Community-level SIAs for regulatory amendments are guided largely by National Standards 8 (Communities) and 4 (Allocations) under the provisions of the MSA; the National Environmental Policy Act (NEPA); and Tribal consultation and collaboration processes guided or informed by EO 13175, a Presidential Memorandum, and a Council action as described below. Each of these are summarized in turn in the following subsections.

13.1.1 Magnuson-Stevens Act National Standards 8 and 4

National Standard 8 (50 CFR [Code of Federal Regulations] 600.345[29]) specifies that conservation and management measures shall, consistent with the conservation requirements of the MSA, take into account the importance of fishery resources to fishing communities by utilizing economic and social data that are based on the best scientific information available in order to (1) provide for the sustained participation of such communities, and (2) to the extent practicable, minimize adverse economic impacts to such communities.

Per National Standard 8, the term "fishing community" means a community that is substantially dependent on or substantially engaged in the harvest or processing of fishery resources to meet social and

[29]The National Standard 8 guidelines referenced, current as of January 16, 2025, are from the Electronic Code of Federal Regulations (CFR) Title 50, Chapter VI, Part 600, Subpart D, Section 600.345 (cited as 50 CFR 600.345) are available at https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=6b0acea089174af8594db02314f26914&mc=true&r=SECTION&n=se50.12.600_1345 accessed 1/20/2025.

economic needs, and includes fishing vessel owners, operators, and crew, and fish processors that are based in such communities. A fishing community is a social or economic group whose members reside in a specific location and share a common dependency on commercial, recreational, or subsistence fishing or directly related fisheries-dependent services and industries (for example, boatyards, ice suppliers, tackle shops). Also, per National Standard 8, the term "sustained participation" means continued access to the fishery within the constraints of the condition of the resource.

Under National Standard 4, conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various U.S. fishermen, such an allocation shall be: (1) fair and equitable to all such fishermen; (2) reasonably calculated to promote conservation; and (3) carried out in such a matter that no particular individual, corporation, or other entity acquires and excessive share of such privileges. Among other National Standard 4 guidelines:

> *Definition. An "allocation" or "assignment" of fishing privileges is a direct and deliberate distribution of the opportunity to participate in a fishery among identifiable, discrete user groups or individuals. Any management measure (or lack of management) has incidental allocative effects, but only those measures that result in direct distributions of fishing privileges will be judged against the allocation requirements of Standard 4.*
>
> *An allocation of fishing privileges may impose a hardship on one group if it is outweighed by the total benefits received by another group or groups. An allocation need not preserve the status quo in the fishery to qualify as "fair and equitable," if a restructuring of fishing privileges would maximize overall benefits. The Council should make an initial estimate of the relative benefits and hardships imposed by the allocation, and compare its consequences with those of alternative allocation schemes, including the status quo. Where relevant, judicial guidance and government policy concerning the rights of treaty Indians and aboriginal Americans must be considered in determining whether an allocation is fair and equitable* (50 CFR 600.325[30]).

13.1.2 Social and Economic Analysis Under NEPA

Under NEPA, "economic" and "social" effects are specific environmental consequences to be examined (40 CFR 1502.16 and 1508.8).

13.1.3 Tribal Consultation and Collaboration

EO 13175 of November 6, 2000, Consultation and Coordination with Indian Tribal Governments (65 FR 67249; November 9, 2000), was promulgated:

> "*…in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes*."

The Presidential Memorandum of January 26, 2021, Tribal Consultation and Strengthening Nation-to-Nation Relationships (86 FR 7491, January 29, 2021) affirms a commitment to:

[30] The National Standard 4 guidelines referenced, current as of January 16, 2025, are from the Electronic Code of Federal Regulations (CFR) Title 50, Chapter VI, Part 600, Subpart D, Section 600.325 (cited as 50 CFR 600.325) are available at https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=6b0acea089174af8594db02314f26914&mc=true&r=SECTION&n=se50.12.600_1325 accessed 1/20/2025.

> "…*honoring Tribal sovereignty and including Tribal voices in policy deliberation that affects Tribal communities. The Federal Government has much to learn from Tribal Nations and strong communication is fundamental to a constructive relationship*."

The Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships does not change the definition of a Federal agency as specified under EO 13175, and as such, the National Marine Fisheries Service (NMFS) is the agency responsible for carrying out Tribal Consultations.

Additionally, on February 8, 2021, the NPFMC unanimously adopted a motion[31] relative to the Community Engagement Committee that recommended, among other actions, that the Council work "*with NMFS to receive and understand results of Tribal Consultation meetings as early in the process as possible, preferably prior to Council final action*."

13.2 Social and Community Impacts of the Central GOA RPP and RP as Identified in Previous Program Reviews

This section provides an overall summary of social and community impacts previously described in NPFMC documents as associated with the RPP and the RP. Also noted are previous conclusions drawn regarding the presence or absence of risks to the sustained participation of fishing communities in the Central GOA rockfish fishery since the fishery began to be managed under the RP.

13.2.1 Community Impacts of the RPP as Identified in Previous NPFMC Analyses

Community and social impacts of the RPP were documented in two previous NPFMC reports. These are the *Gulf of Alaska Rockfish Pilot Program Review* (NPFMC 2008) and the *Regulatory Impact Review, Final Environmental Assessment, and Initial Regulatory Flexibility Analysis for proposed Amendment 88 to the Gulf of Alaska Fishery Management Plan, Central Gulf of Alaska Rockfish Program* (NPFMC 2011). The main findings of those documents relating to community or social impacts are summarized in this section.

The *Gulf of Alaska Rockfish Pilot Program Review* (NPFMC 2008), completed after the first year of fishery management under the RPP, included what can be described as five main community impact related findings.

(1) Transfers of quota from CP cooperative allocations to CV cooperatives benefitted CV cooperatives affiliated with Kodiak shoreside processors as well as the processors themselves. CP cooperatives were not permitted to receive quota transfers from CV cooperatives and this 'one-way door' was intended to protect interests of shoreside and communities, if CP production efficiencies exceeded those of the shoreside processing sector. Under these rules, approximately half of the primary rockfish allocation to CP cooperatives was transferred to CV cooperatives. In addition, approximately one-half of the CP sablefish allocation was transferred to CV cooperatives.

(2) Little information was available regarding impacts to captains and crew, but no major adverse program effects were obvious. Impacts to CV crew payments were assumed to be beneficial, but data to quantify these impacts were not available.

(3) Some Kodiak shoreside processors benefited from their history in the fishery, others benefitted from their participation in the entry-level trawl fishery, and the community benefitted from virtually all Central GOA rockfish shoreside processing remaining in Kodiak. Historically,

[31] https://meetings.npfmc.org/CommentReview/DownloadFile?p=2c4a513f-889d-4647-9bea-29ed4bde660f.pdf&fileName=D1%20Motion.pdf

Kodiak was the base for operations in the shoreside sector of the Central GOA rockfish fisheries and almost all processing in the fisheries took place in Kodiak leading up to implementation of the RPP. Since the RPP established a cooperative system with strong cooperative associations with historic processors and a limited access fishery that required deliveries to processors meeting historic processing qualifications, deliveries in the main program continued to be made to Kodiak shoreside processors. In addition, only Kodiak processors participated in the entry-level trawl fishery by providing markets for entry-level trawl CVs.

(4) A temporal redistribution of rockfish fishery landings had operational benefits for shoreside processors in Kodiak and had additional benefits to the community of Kodiak through CVs and their crews being in the community for a longer portion of the year (and perhaps longer periods of time during deliveries). The impacts on Kodiak shoreside processing crews and support service businesses from the shift of the peak in rockfish landings from July to May/June in combination with their occurrence over a greater portion of the year were likely beneficial (with the potential exception of a loss of opportunity for overtime pay for some processing workers), but data to quantify these impacts were not available.

(5) The transfer of quota from the CP to the CV sector benefitted Kodiak through increased local vessel activity and deliveries to shoreside processors.

These findings were broadly consistent with community impacts predicted in the pre-implementation *Regulatory Impact Review and Final Environmental Assessment for Proposed Amendment 68 to the Gulf of Alaska Fishery Management Plan: Central Gulf of Alaska Rockfish Demonstration Program* (NPFMC 2006), with one exception. The 2006 document suggested that "under either alternative, catcher vessel entities that receive small allocations could be disadvantaged, if holders of large allocations are able to draft cooperative terms that favor holders of large allocations over holders of small allocations." The 2008 document is silent on whether entities with smaller allocations were subsequently disadvantaged, but later input from industry (Alaska Groundfish Data Bank 2017[32]) suggested that this had not occurred.

The *Regulatory Impact Review, Final Environmental Assessment, and Initial Regulatory Flexibility Analysis for proposed Amendment 88 to the Gulf of Alaska Fishery Management Plan, Central Gulf of Alaska Rockfish Program* (NPFMC 2011), completed after the fourth year of fishery management under the RPP, included three main community impact related findings. The first two findings were essentially the same as findings (4) and (5) from the 2008 rockfish pilot program review already described. [33] The third finding was that the community effects of the RPP were limited to changes in Kodiak-based activity.

13.2.2 Community Impacts of the RP as Identified in Previous NPFMC Analyses

Social and community impacts of the RP from its implementation through the first five years of the program were documented in the *Central GOA Rockfish Program Review and Rockfish Allocation Review* (NPFMC 2017) and Appendix 1 to that document, which was an SIA (Northern Economics 2017). The *Central GOA Rockfish Program Reauthorization SIA* (Wislow Research 2020), which appeared as Appendix 1 to the *EA/RIR for Proposed Amendment 111 to the Fishery Management Plan for the Gulf of Alaska* built directly on the 2017 Central GOA Rockfish Program Review SIA as supplemented with an additional two years of quantitative fisheries data.

[32] Personal communication 8/21/2017.

[33] The only difference in wording in these two findings occurs in what was described as Finding 4 from the 2008 document. The following sentence appears in the 2008 document: "Vessels making deliveries have less pressure to return quickly to the grounds to obtain a share of the available catch in the fisheries, so some likely remain in town for longer periods during which they use local services." In the 2011 document, the wording "…*they* [referring to the vessels] use local services" was changed to "…*the crew* use local services" (emphasis added).

The community and social impacts of the RP identified in the 2017 and 2020 SIAs are broadly consistent with those described for the RPP, with a few important differences based primarily on changes in the community protection measures built into the two programs and the change in initial quota allocation qualification years between the two programs.

Among the community protection measures included in the RPP were both Kodiak-specific measures and general measures. Kodiak-specific measures included: (1) CVs were allowed to form cooperatives only in association with shoreside processors located in Kodiak, and (2) processors were limited in their ability to process catch outside the communities in which they had traditionally processed primary rockfish species and associated secondary species. The limitation in measure (2) was imposed to help protect the community of Kodiak from adverse impacts of a program that could otherwise increase flexibility of where catch was landed and processed. General community protection measures included the establishment of entry-level fisheries for both trawl and longline harvests of Central GOA rockfish. Landings in both entry-level fisheries could only be made at shoreside processors not in a cooperative.

Community protection measures that were modified or added under the RP also included Kodiak-specific measures and general measures. Kodiak-specific measures included in the RPP included one that permitted catcher vessels to form a cooperative only with the processor the CV delivered a majority of their relevant catch to from 1996 through 2000. The RP modified the requirement to allow CVs to annually join the cooperative of their choice with a Kodiak-based processor, regardless of where they had delivered rockfish in the past.

Further, to address concerns raised by processors that the RP would provide harvesters an undue competitive advantage and that they could use that potential advantage to deliver outside of the traditional port of Kodiak, the RP included a requirement that all primary and rockfish secondary species cooperative quota in the catcher vessel sector be delivered to a shoreside processor within the City of Kodiak. In addition to protecting traditional processors, the requirement was specifically intended to protect the fishing community of Kodiak.

As a general measure, the entry-level fishery for trawl vessels was eliminated but the entry-level fishery for longline vessels was maintained under the RP.[34] Longline catcher vessels were allowed to deliver to any shoreside processor in any community in the GOA region, including processors affiliated with cooperatives (which could not occur under the RPP).

Several other features of the RP, though not explicitly community protection measures, were noted in the 2017 and/or 2020 SIAs as having served (at least as of 2018) to avoid or minimize some types of adverse social/community impacts experienced when other catch share programs were implemented in Alaska. These include three separate features.

(1) The attachment of catch history to the LLP license and making it non-severable from the LLP license had served to limited consolidation since quota shares could not be stacked on fewer LLP licenses. The non-severability of quota from a license also meant that a person would need to sell the entire LLP license including all of the associated quota. Selling the LLP license would result in a vessel operator giving up whatever other endorsements were associated with the LLP license. The vessel operator would need to have access to another LLP license with the appropriate endorsements to continue fishing the GOA/BSAI with trawl gear. LLP license transfers did not appear to have occurred at a greater rate under the RP relative to the limited access years.

(2) Ownership and use caps had been effective in limiting vessel consolidation. The caps were developed to balance the goals of improving economic efficiency by allowing entities to take advantage of relative economies of scale while maintaining employment opportunities for vessel

[34] CVs that met participation criteria in the RPP entry-level trawl fishery during 2007, 2008, or 2009 received initial allocations of QS under the RP.

crew. About the same number of vessels and processors were participating in the Central GOA rockfish fishery as before the RPP was implemented, although two processors in Kodiak had exited participation in the program in what were then recent years, one through acquisition by another firm and one through a cessation of operations. Cooperative quota transfers could occur within the cooperative, but consolidation had not been reported as an issue, in part because of use caps.

(3) For the RPP, eligibility to receive quota share of primary and secondary species was based on targeted legal qualifying landings made during the years 1996 through 2002. A person's primary species allocation was based on the best five of seven years of landings during the eligibility period. The RP quota share qualification was based on targeted legal landings during the years 2000 through 2006 or fishing in the entry-level fishery during 2007, 2008, or 2009. The allocation of quota share was based on the best five of seven years from 2000 through 2006, or the number of years fished during the qualifying period for entry-level fishery participants that did not qualify for quota based on history from 2000 through 2006. This change effectively locked in benefits to Kodiak that accrued from one-way transfers of quota from the CP sector to the CV sector during the RPP.

No issues were identified in either of the previous Central GOA Rockfish Program Review or Reauthorization SIAs that would put the sustained participation of any fishing communities (i.e., those substantially engaged in or substantially dependent upon the Central GOA rockfish trawl or entry-level Central GOA rockfish longline fisheries) at risk. Similarly, no issues of potential environmental justice concern were identified in either of the previous Central GOA Rockfish Program Review or Reauthorization SIAs.

13.3 Quantitative Indicators of Community Fishery Engagement and Dependence

The following series of tables provides updated quantitative Central GOA rockfish fishery participation information, within the bounds of confidentiality restrictions, for the communities most directly engaged in the Central GOA rockfish trawl fisheries (Section 13.3.1), along with their participation in the Central GOA rockfish longline fisheries where relevant (Section 13.3.2). Given that the focus of this program review is on performance of the RP in the years following the initial program review (2017) and the Central GOA Rockfish Program Reauthorization analysis (2020), most of the tables and figures in this section provide annual average data for the pre-RPP era (2003-2006), the RPP era (2007-2011), and the earlier analyzed RP era (2012-2018). Both annual data and annual average data are presented for the RP era not covered by earlier comprehensive SIA analyses (2019-2024) when informative and not precluded by data confidentiality constraints.

13.3.1 Central GOA Rockfish Trawl Fishery Indicators

The following sections contain a range of quantitative information in the form of tables and figures with minimal accompanying text noting salient points relevant to RP fishing community protection measures and outcomes regarding engagement (or participation) in and dependency (or reliance) on the Central GOA rockfish trawl fishery by community or community group for the following sectors:

- Central GOA Rockfish Trawl CVs
- Central GOA Rockfish Trawl CV Quota Shares, LLP Licenses, Homeports, and AFA Status
- Central GOA Rockfish Trawl CV Crew and Crew Compensation
- Central GOA Rockfish Trawl CPs
- Central GOA Rockfish Trawl CP Quota Shares, LLP Licenses, Homeports, and AFA/A80 Status

- Shoreside Processors Accepting Central GOA Rockfish Trawl-Caught Deliveries

13.3.1.1 Central GOA Rockfish Trawl Catcher Vessels

Table 13-1 provides a count, by community or community aggregation[35] of ownership address and year, of Central GOA rockfish trawl CVs for all communities and states. As shown, in the years 2019-2024, Kodiak accounted for more than half the CVs that were active in the fishery and the percentage of Kodiak ownership has increased over earlier series of years shown. Of note, however, is that while the average percentage has increased, the absolute number of Kodiak vessels has declined in the last few years shown.

Table 13-1 Central GOA Rockfish Trawl CVs by Community of Vessel Historic Ownership Address, 2003-2024 (number of vessels)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	2024	Annual Average 2019-2024 (number)	Annual Average 2019-2024 (percent)	Unique Vessels 2019-2024 (number)
Anchorage	0.8	0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Kodiak	11.3	11.8	12.3	17	15	15	12	13	13	14.2	58.62%	18
Alaska Subtotal	12.0	11.8	12.3	17	15	15	12	13	13	14.2	58.62%	18
Seattle MSA	2.5	3	5.3	6	5	3	5	3	1	3.8	15.86%	9
Other WA*	4.8	3	3.7	3	2	2	1	2	1	1.8	7.59%	3
Washington Subtotal	7.3	6	9.0	9	7	5	6	5	2	5.7	23.45%	12
Newport	3.8	3.4	2.4	2	2	2	3	2	1	2.0	8.28%	3
Other OR/Other States**	6.0	5.2	3.6	1	3	4	2	2	2	2.3	9.66%	5
Oregon/Other States Subtotal	9.8	8.6	6.0	3	5	6	5	4	3	4.3	17.93%	7
Grand Total	29.0	26.4	27.3	29	27	26	23	22	18	24.2	100.00%	35

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

* Other WA Includes: Anacortes, Blaine, Camas, East Wenatchee, Lynden and South Bend

**Other OR/Other States includes: (Cloverdale, Depoe Bay, Florence, Independence, Keizer, Port Ortford, Siletz, South Beach, Toledo and Warrenton) Oregon and Fruitland Idaho

Table 13-2 provides information on Central GOA rockfish trawl CVs real ex-vessel gross revenue. In the years 2019-2023,[36] Alaska CVs (which were all Kodiak CVs in these years) accounted for over half of all CV ex-vessel gross revenue in the fishery on an average annual basis for the first time among the different year series shown. It is important to note, however, that while the percentage was up, the absolute value in dollars has declined in the last few years shown.

[35] The Seattle Metropolitan Statistical Area (Seattle MSA), a US Census categorization of Seattle-Tacoma-Bellevue metropolitan area, encompasses King, Peirce, and Snohomish counties, Washington and is commonly used in NPFMC analyses rather than the City of Seattle for the purposes of fishing community analysis so as not to understate the social and economic interconnectedness of the greater Seattle area and its importance to federally managed fisheries offshore of Alaska. Similarly, for some data types used in in this fishing communities section, Lincoln County Oregon is used as an aggregation for communities near Newport Oregon that share social and economic ties related to offshore Alaska fisheries, which includes, in addition to Newport itself, Depoe Bay, Siletz, South Beach, and Toledo, among others.

[36] Revenue data for 2024 for the CV sector and other relevant Central GOA rockfish fishery sectors described in this Fishing Communities section were not available at the time this report was drafted.

Table 13-2 Central GOA Rockfish Trawl CV Ex-Vessel Gross Revenue, Central GOA Trawl-Caught Rockfish Target Fisheries Only, by Community of Vessel Historic Ownership Address, 2003-2024 (Millions of 2023 dollars)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	Annual Average 2019-2023 (dollars)	Annual Average 2019-2023 (percent)
Alaska Sutotal	1.9	2.3	4.1	4.4	3.0	5.0	3.7	2.7	3.7	57.84%
Seattle MSA	.4	.9	1.6	1.5	*	*	*	*	1.3	19.76%
Other WA*	1.1	1.1	1.3	.9	*	*	*	*	.4	6.10%
Washington Subtotal	1.4	2.0	2.9	2.4	1.5	1.3	1.8	1.3	1.7	25.86%
Newport	.8	.9	.5	*	*	*	*	*	.4	5.78%
Other OR/Other States**	1.5	2.1	1.3	*	*	*	*	*	.7	10.52%
Oregon/Other States Subtotal	2.3	3.0	1.8	1.0	.9	1.2	1.4	.9	1.1	16.30%
Grand Total	5.7	7.2	8.8	7.8	5.3	7.5	6.9	4.9	6.5	100.00%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

* Other WA Includes: Anacortes, Blaine, Camas, East Wenatchee, Lynden and South Bend

**Other OR/Other States includes: (Cloverdale, Depoe Bay, Florence, Independence, Keizer, Port Ortford, Siletz, South Beach, Toledo and Warrenton) Oregon and Fruitland Idaho

Table 13-3 provides information on Central GOA rockfish trawl CV annual average dependency on Central GOA trawl-caught rockfish compared to total catches (all other areas, gear types, and species fished) by those same vessels during the series of years shown. For Alaska rockfish trawl CVs (all of which are Kodiak CVs during the RPP and RP periods), the relative dependence on Central GOA rockfish as measured by ex-vessel gross revenues has increased over each of the periods shown. The increased dependence on rockfish, even when the average rockfish revenue declined in recent years, indicates that revenues derived from other fisheries were decreasing at a greater rate.

Table 13-3 Central GOA Rockfish Trawl CVs Ex-Vessel Gross Revenue Diversification, by Community of Vessel Historic Ownership Address (Central GOA rockfish ex-vessel gross revenue as a percentage of total ex-vessel gross revenue)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019-2023 Average
Alaska Subtotal	8.69%	8.68%	13.44%	15.52%
Seattle MSA	13.98%	17.60%	12.52%	11.64%
Other WA*	16.06%	22.64%	23.74%	20.00%
Washington Subtotal	15.45%	20.08%	15.95%	12.91%
Newport	10.74%	9.92%	7.52%	7.50%
Other OR/Other States**	17.67%	20.41%	16.38%	15.36%
Oregon/Other States Subtotal	14.54%	15.50%	12.20%	10.00%
Grand Total	11.97%	13.12%	13.87%	13.59%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

* Other WA Includes: Anacortes, Blaine, Camas, East Wenatchee, Lynden and South Bend

**Other OR/Other States includes: (Cloverdale, Depoe Bay, Florence, Independence, Keizer, Port Ortford, Siletz, South Beach, Toledo and Warrenton) Oregon and Fruitland Idaho

Table 13-4 provides information on Central GOA rockfish trawl CV annual average dependency on Central GOA trawl-caught rockfish compared to total catches (all other areas, gear types, and species fished) by all CVs with ownership addresses in the same community or group of communities (i.e., the

total "community commercial fishing fleet" not just the Central GOA rockfish trawl CV fleet. The percentage average annual ex-vessel gross revenue derived from the Central GOA rockfish trawl fishery has increased for Kodiak community fleet for the period 2019-2023 compared to other periods shown but remains at less than four percent for the Kodiak fleet and for community fleets in all geographic categories (except the "Other Oregon/Other States" category, which includes a very small number of CVs).

Table 13-4 Total Community CV Fleet (all species, gear type, and area fisheries combined) Ex-Vessel Gross Revenue Diversification for Communities with any Central GOA Rockfish Trawl CV Historic Ownership Addresses in any year, 2003-2023 (Central GOA rockfish ex-vessel gross revenue percent of total ex-vessel gross revenue)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019-2023 Average
Alaska Subtotal	1.59%	1.49%	2.94%	3.21%
Seattle MSA	0.09%	0.17%	0.20%	0.25%
Other WA*	2.76%	2.55%	3.04%	1.46%
Washington Subtotal	0.30%	0.35%	0.35%	0.31%
Newport	2.07%	2.77%	1.62%	1.32%
Other OR/Other States**	17.67%	20.41%	16.38%	15.36%
Oregon/Other States Subtotal	5.00%	6.87%	3.25%	2.07%
Grand Total	0.88%	0.93%	0.86%	0.90%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

* Other WA Includes: Anacortes, Blaine, Camas, East Wenatchee, Lynden and South Bend

**Other OR/Other States includes: (Cloverdale, Depoe Bay, Florence, Independence, Keizer, Port Ortford, Siletz, South Beach, Toledo and Warrenton) Oregon and Fruitland Idaho

13.3.1.2 Central GOA Rockfish Trawl CV Quota Shares, LLP Licenses, Homeports, and AFA Status

Table 13-5 provides a sum of quota share holdings of primary rockfish fishery species by percentage of all quota shares (catcher vessels and catcher processors combined) and distinct count of trawl CV LLP licenses, by community, for the first year and the most recent year of RP (2012 and 2025, respectively). Alaska QS holding percentages have increased for all three species and endorsed LLP license ownership has increased for two of the three species. Within Alaska, the figures for Homer are unchanged, Kodiak accounts for virtually all of Alaska's gains, and Soldotna LLP license ownership has occurred only in the most recent two years covered by the data (see Figure 13-1). The Seattle MSA and Lincoln County Oregon gained QS in all three species (and, in the case of the Seattle MSA, there have been gains in LLP endorsed licenses with QS for each of the three species), while in the "Other Washington" and "Other Oregon" aggregates, ownership of QS and LLP licenses with QS holdings has declined across all three species. The only change between the CV and CP sectors in terms of total QS holdings by sector over the 2012-2025 period for these three primary species occurred in Pacific ocean perch where total CV holdings increased by 0.03 percent and total CP holdings decreased by the same percentage.

Table 13-5 Sum of CV LLP License QS Holdings by Primary Rockfish Species by Percentage of all QS (CV and CP Combined) and Distinct Count of Trawl CV LLP Licenses, by Community, First Year (2012) and Most Recent Year (2025) of the RP

State	Community	Northern Rockfish				Pacific Ocean Perch				Pelagic Shelf/Dusky Rockfish			
		2012		2025		2012		2025		2012		2025	
		Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses
Alaska	Homer	0.21%	1	0.21%	1	1.11%	1	1.11%	1	0.25%	1	0.25%	1
	Kodiak	18.86%	21	24.34%	21	23.60%	16	26.10%	21	22.25%	16	26.02%	21
	Soldotna	0.00%	1	0.00%	1	0.00%	0	0.00%	1	0.00%	0	0.00%	1
	ALASKA TOTAL	**19.07%**	**23**	**24.55%**	**23**	**24.71%**	**17**	**27.21%**	**23**	**22.50%**	**17**	**26.27%**	**23**
Washington	Kirkland	0.00%	0	18.47%	2	0.00%	0	12.28%	2	0.00%	0	22.56%	2
	Mercer Island	0.01%	1	0.00%	0	0.31%	1	0.00%	0	0.23%	1	0.00%	0
	Renton	0.00%	0	0.01%	1	0.00%	0	0.31%	1	0.00%	0	0.23%	1
	Seattle	9.71%	9	22.92%	16	12.03%	9	25.82%	15	9.82%	9	21.08%	16
	Woodway	0.00%	0	2.17%	1	0.00%	0	1.43%	1	0.00%	0	3.69%	1
	Seattle MSA Subtotal	9.72%	10	43.56%	20	12.34%	10	39.84%	19	10.05%	10	47.56%	20
	Camas	7.63%	1	0.00%	0	2.64%	1	0.00%	0	5.75%	1	0.00%	0
	East Wenatchee	1.63%	1	0.00%	0	1.48%	1	0.00%	0	1.38%	1	0.00%	0
	South Bend	3.29%	2	3.29%	2	2.66%	2	2.65%	2	4.35%	2	4.35%	2
	Other WA Subtotal	12.55%	4	3.29%	2	6.78%	4	2.65%	2	11.48%	4	4.35%	2
	WASHINGTON TOTAL	**22.26%**	**14**	**46.85%**	**22**	**19.12%**	**14**	**42.49%**	**21**	**21.53%**	**14**	**51.92%**	**22**
Oregon	Newport	0.87%	3	3.92%	3	1.76%	3	5.13%	3	0.47%	3	2.43%	3
	Siletz	5.26%	3	5.62%	4	4.04%	3	4.04%	3	5.88%	3	6.02%	4
	South Beach	1.58%	1	0.00%	0	1.11%	1	0.00%	0	0.95%	1	0.00%	0
	Toledo	0.00%	1	0.00%	0	0.19%	1	0.00%	0	0.02%	1	0.00%	0
	Lincoln Co Subtotal	7.71%	8	9.54%	7	7.10%	8	9.16%	6	7.32%	8	8.44%	7
	Astoria	3.48%	2	1.44%	1	2.21%	2	1.23%	1	4.09%	2	2.00%	1
	Charleston	1.30%	1	0.00%	0	1.10%	1	0.00%	0	0.82%	1	0.00%	0
	Clackamas	1.83%	1	0.00%	0	2.26%	1	0.00%	0	1.15%	1	0.00%	0
	Florence	3.37%	2	0.00%	0	2.49%	2	0.00%	0	3.86%	2	0.00%	0
	Independence	0.00%	0	7.63%	1	0.00%	0	2.64%	1	0.00%	0	5.75%	1
	Other OR Subtotal	9.98%	6	9.07%	2	8.06%	6	3.87%	2	9.92%	6	7.74%	2
	OREGON TOTAL	**17.69%**	**6**	**9.54%**	**7**	**22.25%**	**22**	**9.16%**	**6**	**17.24%**	**22**	**8.44%**	**7**
Other States	Marana, AZ	0.00%	0	0.93%	1	0.00%	0	2.45%	1	0.00%	0	0.98%	1
	Rockland, ME	0.00%	0	9.07%	2	0.00%	0	14.82%	2	0.00%	0	4.65%	2
	Roland, OK	0.16%	1	0.00%	0	0.97%	1	0.00%	0	0.29%	1	0.00%	0
	OTHER STATES TOTAL	**0.16%**	**1**	**9.99%**	**3**	**0.97%**	**1**	**17.27%**	**3**	**0.29%**	**1**	**5.63%**	**3**
All CVs	**SUBTOTAL**	**59.17%**	**46**	**59.17%**	**46**	**59.97%**	**45**	**60.00%**	**45**	**61.57%**	**46**	**61.57%**	**46**
All CPs	**SUBTOTAL**	**40.83%**	**11**	**40.83%**	**11**	**40.03%**	**10**	**40.00%**	**10**	**38.43%**	**11**	**38.43%**	**11**
CVs and CPs	**GRAND TOTAL**	**100.00%**	**57**	**100.00%**	**57**	**100.00%**	**55**	**100.00%**	**55**	**100.00%**	**57**	**100.00%**	**57**

Source: AKFIN 2025

Table 13-6 provides information on the correspondence of number of Central GOA rockfish trawl CVs participating in the fishery on an annual average basis, the total number of unique CVs, and the number of trawl endorsed LLP licenses used in the Central GOA rockfish fishery, by community. Of note within Alaska communities is the growth of Kodiak engagement in each of these categories in each successive era. Also notable is the exit of False Pass and Sand Point LLP licenses with QS ownership between the RPP and RP eras[37] and the new entry of Soldotna and return of Anchorage ownership of LLP licenses

[37] False Pass appears in the data as the ownership address for one LLP license for 2003-2009, while Homer appears as the ownership address for that same LLP license for 2010-2024 (making this the only LLP license shown as continuously having Alaska ownership for the entire 2003-2024 period outside of Kodiak, albeit in two different communities). This LLP license did not qualify for a RPP initial allocation based on False Pass ownership years related catch history but did qualify for RP initial allocation based on its Homer ownership years related catch history. Sand Point appears in the data as an ownership address for one LLP license in 2006 and 2007 (and ownership of that LLP license is shown as Bellingham, Washington for 2003-2005 and 2008-2013, and Kodiak for 2014-2024). This LLP

with QS in the RP era. Finally, it is noteworthy that in False Pass, Sand Point, Soldotna, and Anchorage local address LLP license with QS ownership has not been accompanied by local address ownership of CVs participating in the Central GOA rockfish fisheries.

Table 13-6 Correspondence of Central GOA Rockfish CV Ownership Address Community with GOA Trawl Endorsed LLP License Ownership Address Community Used in the Central GOA Rockfish Fishery, Selected Time Intervals, 2003-2024

Community	2003-2006 (Pre-RPP)			2007-2011 (RPP)			2012-2018 (RP)			2019-2024 (RP)		
	Annual Average Number of Active CVs	Number of Unique Active CVs	Number of Unique LLP Licences	Annual Average Number of Active CVs	Number of Unique Active CVs	Number of Unique LLP Licences	Annual Average Number of Active CVs	Number of Unique Active CVs	Number of Unique LLP Licences	Annual Average Number of Active CVs	Number of Unique Active CVs	Number of Unique LLP Licences
Kodiak	9.3	10	16	12.2	15	17	12.7	16	19	13.7	17	23
Anchorage*	0	0	1	0	0	0	0	0	0	0	0	1
False Pass*	0	0	1	0	0	1	0	0	0	0	0	0
Homer*	0	0	0	0	0	1	0	0	1	0	0	1
Sand Point*	0	0	1	0	0	1	0	0	0	0	0	0
Soldotna*	0	0	0	0	0	0	0	0	0	0	0	1
Seattle MSA	3.3	4	15	4	5	16	5.4	7	19	3.7	9	20
Other Washington	3.3	4	9	3	4	9	4	4	8	2.0	4	5
Lincoln Co. Oregon	2.8	6	10	3	4	9	3.4	6	8	2.8	6	8
Other Oregon	4.8	5	7	3.8	6	5	1.6	5	8	2.2	3	6
Other States/Unknown	1	1	1	0.4	1	1	0	0	1	0	0	1
Total	**24.3**	**30**	**55**	**26.4**	**32**	**55**	**27.1**	**33**	**55**	**24.2**	**35**	**55**

Note: Number of unique vessels and LLP licences may not sum to column total as ownership may have changed during the periods shown.
* Alaska ownership of relevant LLP licenses outside of Kodiak is limited to these five communities. Anchorage appears in the data as an ownership address for 1 LLP license in 2003 and 2004 (and ownership of that LLP license is shown as Seattle for 2005-2018) and in 2022 (and ownership of that LLP license is shown as Seattle in all other years 2003-2024). False Pass appears in the data as the ownership address for 1 LLP licnese for 2003-2009, while Homer appears as the ownership address for that same LLP license for 2010-2024 (making this the only LLP license shown as continuously having Alaska ownership for the entire 2003-2024 period outside of Kodiak, albeit in 2 different communities). Sand Point appears in the data as an ownership address for 1 LLP license in 2006 and 2007 (and ownership of that LLP license is shown as Bellingham WA for 2003-2005 and 2008-2013 and in Kodiak 2014-2024).

Source: AKFIN 2025, NOAA Fisheries 2025.

license did qualify for a RPP initial allocation based on Sand Point ownership years related catch history, but did not qualify for RP initial allocation based on its Sand Point ownership years related catch history

Figure 13-1 provides information on patterns of community of ownership over the years 2017-2024 of the 55 GOA trawl-endorsed CV LLP licenses that have ever been associated with quota shares under the Central GOA RPP/RP. The years 2017-2018 were the last two years shown in an analogous figure in the RP Reauthorization SIA and provide a baseline to see the changes that have occurred 2019-2024.

- Of the 19 LLP licenses with Alaska ownership addresses in 2018, all have remained in the same communities (18 in Kodiak and one in Homer), except for one Kodiak LLP license that changed to a Seattle address in 2021, back to a Kodiak address in 2022 and 2023, then back to a Seattle address in 2024.
- Of the 19 LLP licenses with Seattle MSA ownership addresses in 2018, all have remained in the Seattle MSA except for two that changed to a Kodiak address in 2019 and 2020 respectively and remained in Kodiak through the end of the data series and a third that switched to an Anchorage address for one year only (2022) before reverting to a Seattle MSA address.
- Of the seven LLP licenses with Lincoln County ownership addresses in 2018, all have remained there except for one that changed to a Soldotna, Alaska address in 2023 and remained there in 2024.
- Of the six LLP licenses with an "Other Washington" ownership address in 2018, half when elsewhere by 2021 and of the four with an "Other Oregon" ownership address in 2018, three had gone elsewhere by 2023. Of the six licenses that exited these two "Other" categories, half ended up in Kodiak.

Table 13-7 provides information on the relationship of Central GOA rockfish trawl CV community of ownership address and homeport community, using Alaska CFEC data for homeport designation for 2024. In those instances where community of ownership address varies from community of homeport, that may be indicative of a pattern of differential distribution of vessel port activities, but previous NPFMC social impact analyses (e.g., AECOM 2010) would suggest that homeport designations are, in general, inconsistently predictive of the location of vessel activity in any given fishery. Nevertheless, the table shows marked variation in patterns of correspondence of community of ownership and homeport for Central GOA rockfish trawl CVs for the single year shown. Of the seven communities shown as having local ownership of CVs, only Kodiak has some or all those vessels also homeported in the same community. It also suggests the potential importance Kodiak has as homeport for and a potential supplier of support services to vessels with ownership addresses in other communities, as three of the six CVs with ownership addresses in other communities reported Kodiak as their homeport.

Table 13-8 provides information on the AFA status of Central GOA rockfish trawl CVs by community and region. All else being equal, AFA status would likely reduce the vulnerability of individual vessels to adverse impacts, if any, of the Rockfish Program through co-op or other internal vessel class compensation mechanisms and/or separate accounting of PSC thresholds unique to that vessel class (thereby insulating these vessels somewhat from adverse consequences of actions of vessels outside of their restricted class over which they have very little influence or control). As shown, the percentage of AFA CVs among locally owned Central GOA rockfish trawl CVs vary considerably by geography with, for example, over 60 percent of the Kodiak CVs not being AFA vessels and over 80 percent of the Seattle MSA CVs being AFA vessels.

Figure 13-1 Central GOA CV LLP Licenses with Trawl Endorsements and RP QS, by Community of Ownership Address, 2017-2024

License Count	2017	2018	2019	2020	2021	2022	2023	2024
1	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
2	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
3	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
4	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
5	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
6	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
7	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
8	Kodiak	Kodiak	Kodiak	Kodiak	Seattle	Kodiak	Kodiak	Seattle
9	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
10	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
11	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
12	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
13	Roland OK	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
14	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
15	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
16	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
17	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
18	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
19	Homer	Homer	Homer	Homer	Homer	Homer	Homer	Homer
20	Renton	Renton	Renton	Renton	Renton	Renton	Renton	Renton
21	Seattle	Seattle	Seattle	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
22	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
23	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
24	Seattle	Seattle	Seattle	Seattle	Seattle	Anchorage	Seattle	Seattle
25	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
26	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
27	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
28	Edmonds	Edmonds	Edmonds	Edmonds	Bothell	Bothell	Bothell	Edmonds
29	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
30	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
31	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
32	Woodway	Woodway	Edmonds	Edmonds	Edmonds	Edmonds	Edmonds	Edmonds
33	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
34	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
35	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
36	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
37	Seattle	Seattle	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
38	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
39	Bellingham	Bellingham	Bellingham	Bellingham	Bellingham	Bellingham	Bellingham	Bellingham
40	E. Wanatchee	E. Wenatchee	East Wenatchee	East Wenatchee	Kodiak	Kodiak	Kodiak	Kodiak
41	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend
42	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend
43	Camas	Camas	Camas	Independence	Independence	Independence	Independence	Independence
44	Ridgefield	Ridgefield	no data	no data	no data	no data	Bend	Marana AZ
45	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz
46	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz
47	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz
48	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz	Siletz
49	Lincoln City	Newport	Newport	Newport	Newport	Newport	Newport	Newport
50	Newport	Newport	Newport	Newport	Newport	Newport	Soldotna	Soldotna
51	Newport	Newport	Newport	Newport	Newport	Newport	Newport	Newport
52	Keizer	Keizer	Salem	Salem	Salem	Salem	Newport	Newport
53	Astoria	Astoria	Astoria	Astoria	Astoria	Astoria	Astoria	Astoria
54	Astoria	Astoria	Astoria	Kodiak	Kodiak	Kodiak	Kodiak	Kodiak
55	Charleston	Charleston	Coos Bay	Coos Bay	Coos Bay	Coos Bay	Kodiak	Kodiak

Key:	KODIAK	OTHER ALASKA	SEATTLE MSA	OTHER WASHINGTON	LINCOLN CO OREGON	OTHER OREGON	OTHER STATES

Table 13-7 Correspondence of CV Community of Ownership and Homeport Community for Trawl CVs Active in the Central GOA Rockfish Fishery, 2024

CV Ownership Address	CV Homeport				Total
	Kodiak, AK	Juneau, AK	Newport, OR	Portland, OR	
Kodiak, AK	12				12
Seattle, WA	1				1
South Bend, WA		1			1
Clackamas, OR	1				1
Independence, OR	1				1
Newport, OR				1	1
Siletz, OR			1		1
Total	**15**	**1**	**1**	**1**	**18**

Source: AKFIN 2025

Table 13-8 CVs Participating in the Central GOA RP by AFA Designation and Community of Vessel Historic Ownership Address, 2003-2024 (number of vessels)

Community	Annual Average Number of CVs 2003-2024			Annual Average Percent of CVs 2003-2024		
	AFA	Non-AFA	Total	AFA	Non-AFA	Total
Anchorage	0.1	0.0	0.1	100.0%	0.0%	100.0%
Kodiak	4.7	7.8	12.5	37.4%	62.6%	100.0%
Alaska	4.8	7.8	12.6	38.1%	61.9%	100.0%
Seattle MSA	3.3	0.7	4.0	82.1%	17.9%	100.0%
Other WA*	0.0	3.3	3.3	0.0%	100.0%	100.0%
Washington	3.3	4.0	7.3	44.8%	55.2%	100.0%
Newport	2.3	0.5	2.9	81.7%	18.3%	100.0%
Other OR/Other States**	5.2	3.6	8.8	59.1%	40.6%	100.0%
Oregon/Other States	7.5	4.1	11.6	64.9%	35.3%	100.0%
Grand Total	12.7	14.2	27.0	47.2%	52.8%	100.0%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

* Other WA Includes: Anacortes, Blaine, Camas, East Wenatchee, Lynden and South Bend

**Other OR/Other States includes: (Cloverdale, Depoe Bay, Florence, Independence, Keizer, Port Ortford, Siletz, South Beach, Toledo and Warrenton) Oregon and Fruitland Idaho

13.3.1.3 Central GOA Rockfish Trawl CV Crew and Crew Compensation

Table 13-9 shows the relationship of the community of Central GOA rockfish trawl CV ownership and the communities in which crew members on those vessels reside, utilizing data from the Annual GOA Trawl Catcher Vessel Economic Data Report (EDR) for calendar years 2019-2021. Although now dated, the data presented in this and the following table represent the best and most recent information available on RP CV crew and their compensation, respectively, and provide insight into overall community patterns/order of magnitude of crew employment.[38] Apparent across all years is the concentration among Alaska communities of crew employment in Kodiak and the concentration of overall employment in

[38] EDR data for the GOA CV trawl groundfish fisheries are available for the years 2015-2021 only. The GOA trawl EDR was implemented to collect baseline data in anticipation of a GOA trawl fishery rationalization program. When several years passed without a rationalization program being implemented or appearing likely in the foreseeable future, the GOA trawl EDR was discontinued. GOA trawl CV crew data for the years 2015-2018 derived from the EDR effort is available in the 2020 Central GOA Rockfish Program Reauthorization SIA referenced in Table 2-1.

Alaska among the different states represented in the data. Caution is warranted in interpretation of the data for 2020 due to the COVID pandemic conditions, but in 2019 and 2021 crew members with Kodiak residential addresses accounted for roughly one-third of all crew members and in all three years the crew with Alaska residential addresses accounted for between 40 and 47 percent of all Central GOA trawl CV crew. Table 13-10 provides information on crew and captain compensation of Central GOA RP CVs by community of CV ownership address. As shown, between 51 and 54 percent of combined crew and captains compensation derived from CVs with Kodiak ownership addresses over the 2019-2021 period.

Table 13-9 Correspondence of Central GOA RP CV Ownership Community and Crew Residence Community, 2019-2021

	CV Ownership Address Community																				
	2019							2020							2021						
CV Crew Residence Address Community	Kodiak	Newport	Other OR	Seattle MSA	Other WA	2019 Total	2019 Percent	Kodiak	Newport	Other OR	Seattle MSA	Other WA	2020 Total	2020 Percent	Kodiak	Newport	Other OR	Seattle MSA	Other WA	2021 Total	2021 Percent
Kodiak	60	4	0	8	4	76	38.6%	29	0	1	1	2	33	19.1%	45	0	9	5	6	65	33.0%
Anchorage MSA	2	1	0	0	1	4	2.0%	8	0	0	1	0	9	5.2%	2	0	0	2	0	4	2.0%
Dillingham	0	0	0	0	0	0	0.0%	1	0	0	0	0	1	0.6%	0	0	0	0	0	0	0.0%
Dutch Harbor/Unalaska	1	0	0	0	0	1	0.5%	1	0	0	0	0	1	0.6%	0	0	0	0	0	0	0.0%
Fairbanks	0	0	0	0	0	0	0.0%	2	0	0	0	0	2	1.2%	0	0	0	0	0	0	0.0%
Haines	0	1	0	0	1	2	1.0%	0	0	0	0	0	0	0.0%	0	0	0	0	0	0	0.0%
Homer/Seldovia	2	0	0	0	0	2	1.0%	7	0	0	1	0	8	4.6%	2	0	0	0	0	2	1.0%
Juneau/Douglas/Auke Bay	0	0	0	0	0	0	0.0%	1	0	0	1	0	2	1.2%	0	0	0	0	0	0	0.0%
Kenai/Soldotna/Sterling	1	0	0	0	0	1	0.5%	1	0	0	0	1	2	1.2%	0	0	0	0	0	0	0.0%
Ketchikan	0	0	0	0	0	0	0.0%	1	0	1	1	0	3	1.7%	0	0	0	0	0	0	0.0%
Other Alaska	0	0	0	0	0	0	0.0%	9	0	0	2	0	11	6.4%	3	0	1	2	0	6	3.0%
Petersburg	0	1	0	0	1	2	1.0%	1	0	0	0	0	1	0.6%	0	0	0	0	1	1	0.5%
Sand Point	0	0	0	0	0	0	0.0%	1	0	0	0	0	1	0.6%	0	0	0	0	0	0	0.0%
Sitka	0	0	0	0	0	0	0.0%	2	0	1	2	0	5	2.9%	0	0	0	0	1	1	0.5%
Valdez	0	0	0	0	0	0	0.0%	1	0	0	1	0	2	1.2%	0	0	0	0	0	0	0.0%
Wrangell	0	0	0	0	0	0	0.0%	1	0	0	0	0	1	0.6%	0	0	0	0	0	0	0.0%
ALASKA	**66**	**7**	**0**	**8**	**7**	**88**	**44.7%**	**66**	**0**	**3**	**10**	**3**	**82**	**47.4%**	**52**	**0**	**10**	**9**	**8**	**79**	**40.1%**
Newport	0	1	0	0	0	1	0.5%	0	1	2	1	0	4	2.3%	0	1	3	2	0	6	3.0%
Other Oregon	4	3	3	7	0	17	8.6%	3	2	4	3	2	14	8.1%	9	1	4	4	0	18	9.1%
OREGON	**4**	**4**	**3**	**7**	**0**	**18**	**9.1%**	**3**	**3**	**6**	**4**	**2**	**18**	**10.4%**	**9**	**2**	**7**	**6**	**0**	**24**	**12.2%**
Seattle MSA	5	1	2	14	1	23	11.7%	6	1	4	5	2	18	10.4%	2	0	0	0	0	2	1.0%
Other Washington	3	1		3	1	8	4.1%	7	0	3	2	2	14	8.1%	0	0	0	0	4	4	2.0%
WASHINGTON	**8**	**2**	**2**	**17**	**2**	**31**	**15.7%**	**13**	**1**	**7**	**7**	**4**	**32**	**18.5%**	**2**	**0**	**0**	**0**	**4**	**6**	**3.0%**
OTHER STATES	**28**	**10**	**7**	**14**	**1**	**60**	**30.5%**	**20**	**10**	**3**	**5**	**3**	**41**	**23.7%**	**34**	**12**	**3**	**2**	**2**	**53**	**26.9%**
GRAND TOTAL	**106**	**23**	**12**	**46**	**10**	**197**	**100.0%**	**102**	**14**	**19**	**26**	**12**	**173**	**100.0%**	**97**	**14**	**20**	**17**	**14**	**162**	**82.2%**

Source: Economic Data Reports, data compiled by AKFIN

Table 13-10 Crew and Captain Compensation by CVs Participating in the Central GOA RP by Historic Ownership Address, 2019-2021 (number of vessels and millions of 2023 dollars)

Year	Community	Vessels	Captain Compensation	Crew Compensation	Combined Compensation	Percent of Total
2019	Kodiak Alaska	13	2.6	3.7	6.3	50.9%
	Oregon	3	.8	1.1	1.9	15.2%
	Washington	9	1.6	2.5	4.2	33.9%
	Grand Total 2019	25	5.0	7.3	12.3	100.0%
2020	Community	Vessels	Captain Compensation	Crew Compensation	Combined Compensation	Percent of Total
	Kodiak Alaska	12	2.1	3.0	5.1	51.0%
	Oregon	5	1.3	1.8	3.2	31.7%
	Washington	7	.7	1.0	1.7	17.3%
	Grand Total 2020	24	4.1	5.9	10.0	100.0%
2021	Community	Vessels	Captain Compensation	Crew Compensation	Combined Compensation	Percent of Total
	Kodiak Alaska	13	2.1	2.9	5.0	54.3%
	Oregon	5	1.1	1.5	2.6	27.8%
	Washington	6	.7	.9	1.7	17.9%
	Grand Total 2021	24	3.9	5.3	9.2	100.0%

Source: Economic Data Reports, data compiled by AKFIN

13.3.1.4 Central GOA Rockfish Trawl Catcher Processors

Table 13-11 provides a count, by community of ownership address and year, of Central GOA rockfish trawl CPs for all communities and states. As shown, these CPs are concentrated in two communities, the Seattle MSA and Rockland, Maine. As shown, for the Seattle MSA, there has been a general decline in the number of participating CPs over the pre-RPP, RPP, and 2012-2018 RP eras, with a stable number of CPs (four) participating in the RP in the years 2019-2024 with a total of four unique vessels participating over that time. The single (unique) Rockland Maine CP first appeared in the data in 2017 and has been an annual participant since that time.

Table 13-11 Central GOA Rockfish Trawl CPs by Community of Vessel Historic Ownership Address, 2003-2024 (number of vessels)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	2024	Annual Average 2019-2024 (number)	Annual Average 2019-2024 (percent)	Unique Vessels 2019-2024 (number)
Seattle MSA*	6.8	5.0	4.3	3	3	3	3	3	3	3	75.00%	4
Rockland Maine	0.0	0.0	0.1	1	1	1	1	1	1	1	25.00%	1
Grand Total	**6.8**	**5.0**	**4.4**	**4**	**4**	**4**	**4**	**4**	**4**	**4**	**100.00%**	**5**

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

*Includes South Bend Washington (a non-Seattle MSA community) in pre-RPP years of 2003, 2004, and 2006.

Table 13-12 provides Central GOA rockfish trawl CPs first wholesale gross revenue information for Central GOA rockfish only by aggregations of years 2003-2018 and annually from 2019-2023. Due to data confidentiality constraints, no data at the individual community level can be disclosed for this sector. As shown, there is considerable variability in wholesale values over the years, with 2023 being the only year in the 2019-2023 era hitting the 2012-2018 average.

Table 13-12 Central GOA Rockfish Trawl CP Wholesale Value, Central GOA Rockfish Target Fisheries Only, by Community of Vessel Historic Ownership Address, 2003-2024 (Millions of 2023 dollars)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	Annual Average 2019-2023 (dollars)
Total	11.7	9.6	17.3	11.3	12.1	16.2	21.4	17.3	15.7

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 13-13 provides information on relative reliance on the Central GOA RP fisheries as measured by the percentage of wholesale value of all area and species fisheries these CPs participate in on an annual average basis. As shown, while the average annual wholesale value from the RP fisheries was lower the in the 2019-2023 era than in the 2012-2018 era, the percentage reliance was higher in in the 2019-2023 era than in the 2012-2018 era.

Table 13-13 Central GOA Rockfish Trawl CPs Wholesale Value Diversification, by Community of Vessel Historic Ownership Address (Central GOA rockfish wholesale value as a percent of total wholesale value)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019-2023 Average
Total	10.27%	7.89%	12.78%	16.82%

Source: NMFS Alaska Region Catch Accounting System, data compiled by AKFIN in Comprehensive_BLEND_CA

Table 13-14 provides information on overall "community CP fleet" (all CPs with ownership addresses in that community, not just CP that participate in the Central GOA rockfish trawl fishery) dependency on Central GOA trawl-caught rockfish compared to all other areas, gear types, and species fished by those vessels. (In other words, the universe of communities included in this table consists of those communities with at least one Central GOA rockfish trawl CP having a local ownership address noted in Table 13-11.)

Table 13-14 Total Community CP Fleet (all species, gear type, and area fisheries combined) Wholesale Value Diversification for Communities with any Central GOA Rockfish Trawl CP Historic Ownership Addresses in any year, 2003-2023 (Central GOA rockfish wholesale value percent of total wholesale value)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019-2023 Average
Total	0.56%	0.45%	0.81%	0.92%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

13.3.1.5 Central GOA Rockfish Trawl CP Quota Shares, LLP Licenses, Homeports, and Amendment 80/AFA Status

Table 13-15 provides a sum of quota share holdings of primary rockfish fishery species by percentage of all quota shares (catcher processors and catcher vessels combined) and distinct count of trawl CP LLP licenses, by community, for the first year and the most recent year of RP (2012 and 2025, respectively). Washington QS holding percentages have decreased for all three species and endorsed LLP license ownership has decreased for all three species. Within Washington, there has been variability in holdings among the individual communities listed (Kirkland, Renton, and Seattle), each of which is a part of the Seattle MSA, and virtually all the change in Washington holdings overall between 2012 and 2025 was due to the entrance of Maine-based holdings of LLP licenses with attached QS that began in 2010 and increased in 2017. The only change between the CP and CV sectors in terms of total QS holdings by sector over the 2012-2025 period for these three primary species occurred in Pacific ocean perch where total CP holdings decreased by 0.03 percent and total CV holdings increased by the same percentage.

Table 13-15 Sum of CP LLP License QS Holdings by Primary Rockfish Species by Percentage of all QS (CP and CV Combined) and Distinct Count of Trawl CP LLP Licenses, by Community, First Year (2012) and Most Recent Year (2025) of the RP

		Northern Rockfish				Pacific Ocean Perch				Pelagic Shelf/Dusky Rockfish			
		2012		2025		2012		2025		2012		2025	
State	Community	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses	Sum of Quota Share	Distinct Count of Licenses
Washington	Kirkland	0.00%	0	18.47%	2	0.00%	0	12.28%	2	0.00%	0	22.56%	2
	Renton	13.27%	3	0.00%	0	25.24%	3	0.00%	0	7.67%	3	0.00%	0
	Seattle	27.56%	8	13.29%	7	14.79%	7	12.91%	6	30.76%	8	11.22%	7
	WASHINGTON TOTAL	**40.83%**	**11**	**31.76%**	**9**	**40.03%**	**10**	**25.18%**	**8**	**38.43%**	**11**	**33.78%**	**9**
Maine	Rockland	0.00%	0	9.07%	2	0.00%	0	14.82%	2	0.00%	0	4.65%	2
All CPs	**SUBTOTAL**	**40.83%**	**11**	**40.83%**	**11**	**40.03%**	**10**	**40.00%**	**10**	**38.43%**	**11**	**38.43%**	**11**
All CVs	**SUBTOTAL**	**59.17%**	**46**	**59.17%**	**46**	**59.97%**	**45**	**60.00%**	**45**	**61.57%**	**46**	**61.57%**	**46**
CPs and CVs	**GRAND TOTAL**	**100.00%**	**57**	**100.00%**	**57**	**100.00%**	**55**	**100.00%**	**55**	**100.00%**	**57**	**100.00%**	**57**

Source: AKFIN 2025

Figure 13-2 provides information on patterns of LLP license ownership by community of ownership address over the years 2017-2024 of the 16 GOA trawl-endorsed CP LLP licenses that have obtained quota shares under the RP. The years 2017-2018 were the last two years shown in an analogous figure in the RP Reauthorization SIA and provide a baseline to see the changes, if any, that have occurred from during the years 2019-2024. As shown, there was no movement of LLP licenses between communities, as measured by ownership address, over this period.

Figure 13-2 Central GOA CP LLP Licenses with Trawl Endorsements and RP QS, by Community of Ownership Address, 2017-2024

License Count	2017	2018	2019	2020	2021	2022	2023	2024
1	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
2	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
3	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
4	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
5	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
6	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
7	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
8	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland
9	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland	Kirkland
10	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
11	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
12	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle	Seattle
13	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend	South Bend
14	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME
15	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME
16	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME	Rockland ME

KEY	SEATTLE MSA WASHINGTON	OTHER WASHINGTON	OTHER STATES

Table 13-16 provides information on the relationship of Central GOA rockfish trawl CP community of ownership address and homeport community, using Alaska CFEC data for homeport designation for 2024. As shown, among CPs there is a much closer correspondence between the ownership address and homeport than is the case for CVs also engaged in the RP (see Table 13-7).

Table 13-16 Correspondence of CP Community of Ownership and Homeport Community for Trawl CPs Active in the Central GOA Rockfish Fishery, 2024

CP Ownership Address	CP Homeport			Total
	Seattle, WA	Anacortes, WA	Rockland, ME	
Seattle, WA	1			1
Kirkland, WA	1			1
Kirkland, WA		1		1
Rockland, ME			1	1
Total	**2**	**1**	**1**	**4**

Source: AKFIN 2025

Table 13-17 provides information on the Amendment 80 and AFA status of Central GOA rockfish trawl CPs by community and region. As shown, over the years covered by the pre-RPP, RPP, and RP eras as used for this analysis, all trawl CPs participating in the Central GOA targeted rockfish fisheries were Amendment 80 vessels and none were AFA vessels.

Table 13-17 CPs Participating in the Central GOA RP by A80 or AFA Designation and Community of Vessel Historic Ownership Address, 2003-2024 (number of vessels)

Community	Annual Average Number of CPs 2003-2024			Annual Average Percent of CPs 2003-2024		
	A80	AFA	Total	A80	AFA	Total
Seattle MSA	4.6	0.0	4.6	100.0%	0.0%	100.0%
Rockland ME	0.3	0.0	0.3	100.0%	0.0%	100.0%
Total	4.9	0.0	4.9	100.0%	0.0%	100.0%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

13.3.1.6 Shoreside Processors Accepting Central GOA Rockfish Trawl-Caught Deliveries

Table 13-18 provides information on the distribution of shoreside processors that accepted trawl-caught Central GOA rockfish deliveries in the period 2003-2024. As shown, among Alaska communities, shoreside processing was limited to Kodiak following the pre-RPP era (2003-2006). For the purposes of this analysis, shoreside Central GOA trawl-caught rockfish processors are defined as those shoreside plants (as identified by "F_ID" [intent to operate] and "SBPR" [shore-based processor] codes in AKFIN data) accepting catcher vessel Central GOA trawl-caught rockfish deliveries. As shown, the number of Kodiak processors engaged in the RP fishery has declined since the RPP era (2007-2011) but has remained at four plants in the five most recent years covered by the data (2020-2024), despite considerable consolidation occurring at the processing firm level in Kodiak in recent years as discussed elsewhere (see Section 13.4.1.1).

Table 13-18 Shoreside Processors Accepting Trawl-Caught Central GOA Rockfish Deliveries by Community of Operation, 2003-2024 (number)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	2024	Annual Average 2019-2024 (number)	Annual Average 2019-2024 (percent)	Unique Processors 2019-2024 (number)
Akutan	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
King Cove	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Kodiak	6.3	7.2	6.6	5	4	4	4	4	4	4.2	100.00%	7
Ninilchik	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Sand Point	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Seward	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Grand Total	11.3	7.2	6.6	5	4	4	4	4	4	4.2	100.00%	7

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

Table 13-19 provides information on shoreside processor first wholesale value derived from trawl-caught Central GOA rockfish deliveries by community and year 2003-2023. As shown, the annual average value for Kodiak increased over the pre-RPP, RPP, and initial RP (2012-2018) eras, but has declined somewhat in more recent years, although in two out of three of the most recent years covered by the data (2021-2023) annual values exceeded the annual average value for 2012-2018.

Table 13-19 First Wholesale Value of Trawl-Caught Central GOA Rockfish Deliveries to Shoreside Processors by Community of Processor Operation, 2003-2024 (millions of 2023 dollars)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	Annual Average 2019-2023 (dollars)	Annual Average 2019-2023 (percent)
Kodiak	10.4	18.9	24.5	20.4	20.0	26.4	25.3	22.0	22.8	100.00%
Other Alaska	.0	.0	.0	.0	.0	.0	.0	.0	.0	0.00%
Total	10.4	18.9	24.5	20.4	20.0	26.4	25.3	22.0	22.8	100.00%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

Table 13-20 provides information on average annual Kodiak shoreside processor first wholesale value dependency on Central GOA trawl-caught rockfish products compared to the total wholesale value of all area, gear type, and species fishery products produced by those same processors. As shown, the average annual percentage dependency on Central GOA trawl-caught rockfish products, while remaining below seven percent, has increased in each of the eras covered by the data and has more than doubled from the pre-RPP era to the most recent era covered by the data (2019-2023).

Table 13-20 Shoreside Processors Accepting Trawl-Caught Central GOA Rockfish Deliveries First Wholesale Value Diversification, by Community of Operation, 2003-2023 (Central GOA rockfish first wholesale value percent of total first wholesale value)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019-2023 Average
Kodiak	2.41%	4.84%	5.96%	6.86%
Other Alaska	0.00%	0.00%	0.00%	0.00%
Total	1.11%	4.84%	5.96%	6.86%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

Table 13-21 provides information on average annual total shoreside processor dependency (all shoreside processors in the communities that had at least one Central GOA rockfish trawl shoreside processor, not just the shoreside processors that participated in the Central GOA rockfish trawl fishery) on Central GOA trawl-caught rockfish compared to all area, gear type, and species fishery landings processed by all processors in the community. As shown, for Kodiak the dependency for all shoreside processors as a group closely tracks with the dependency for just those shoreside processors engaged in the RP, as the processors engaged in the RP are the large, multi-species plants in the community that together account for a very large proportion of all processed product first wholesale value originating in Kodiak.

Table 13-21 All Community Shoreside Processors First Wholesale Value Diversification, by Community of Operation for communities at least one shoreside processor accepting Central GOA rockfish trawl-caught deliveries in any year, 2003-2023 (Central GOA rockfish first wholesale value percent of total first wholesale value for all species and area fisheries)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019-2023 Average
Kodiak	2.13%	4.41%	5.70%	6.54%
Other Alaska	0.00%	0.00%	0.00%	0.00%
Total	0.94%	4.41%	5.70%	6.54%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

13.3.1.7 Kodiak Shoreside Processors that Accepted RP Deliveries Employee Compensation and Utility Consumption

Data collected through the EDR program are available for 2015-2021 that cover several aspects of employment at Kodiak shoreside processors and utility consumption at those same shoreside processing plants. Although now dated, the data presented in section represent the best and most recent information available topics and provide insight into overall community patterns/order of magnitude of crew employment and processing utilities consumption.[39]

Table 13-22 provides annual wage and salary information for non-processing workers at shoreside processors in Kodiak that accepted GOA trawl-caught deliveries 2015-2021.

Table 13-22 Annual Wages and Salaries for Non-Processing Employees, Kodiak Shoreside Processors that Accepted RP Deliveries, 2015-2021 (nominal dollars)

Year	Number of Non-Processing Employees	Total Wages and Salary
2015	103	$5,867,350
2016	99	$5,687,856
2017	105	$5,555,475
2018	89	$5,487,553
2019	104	$5,971,542
2020	127	$5,946,245
2021	114	$5,140,688

Source: Economic Data Reports, data compiled by AKFIN

Table 13-23 provides information on labor hours per month for housed and non-housed processing workers (i.e., those provided company housing and those not provided company housing) at shoreside processors in Kodiak that accepted Central GOA trawl-caught rockfish deliveries during the 2019-2021 period. As described in previous comprehensive RPP and RP SIAs, Kodiak shoreside processing plant workforces are unique in Southwest Alaska in that they draw substantial portions of their processing crews from the community labor pool. From the Kodiak perspective, having long-term resident processing workers living in the community (and often having other family members in the community) fosters a more stable population and fosters a higher local multiplier for locally earned wages than is typical in other Southwestern Alaska communities with large multi-species processing plants substantially engaged in federally managed fisheries.

Table 13-24 provides information on water and electric utilities demand, by month, for Kodiak shoreside processors that accepted GOA trawl-caught rockfish deliveries in calendar years 2019-2021. As shown, demand for both water and electricity vary considerably by month but are, from the Kodiak community perspective, essential for keeping the costs of water and electricity affordable for all customers , especially as the power system was specifically designed and built to meet peak processor (and US Coast Guard) demand, meaning that reduced processor demand can potentially impact the cost to all

[39] EDR data for the GOA trawl groundfish fisheries are available for the years 2015-2021 only. The GOA trawl EDR was implemented to collect baseline data in anticipation of a GOA trawl fishery rationalization program. When several years passed without a rationalization program being implemented or appearing likely in the foreseeable future, the GOA trawl EDR was discontinued. Kodiak shoreside processing crew data and utilities consumption data for the years 2015-2018 derived from the EDR effort are available in the 2020 Central GOA Rockfish Program Reauthorization SIA referenced in Table 2-1.

consumers.[40] In other Southwestern Alaska communities with large multi-species processing plants substantially engaged in federally managed fisheries, those plants typically generate their own power.

Table 13-23 Processor Hours and Labor Payments for Processing Employees by Housing Type, Kodiak Shoreside Processors that Accepted RP Deliveries, by Month, 2019-2021 (nominal dollars)

Month	Number of Federal Processing Permits	Number of Groundfish Processing Employees	Processing Labor Person-Hours			Processing Labor Payment		
			Housed Employees	Not Housed Employees	Not Housed as a Percent of Total	Housed Employees	Not Housed Employees	Not Housed as a Percent of Total
2019								
January	5	1,219	47,869	78,664	62.2%	$644,811	$1,109,703	63.2%
February	5	1,293	101,536	171,632	62.8%	$1,402,017	$2,410,091	63.2%
March	5	1,297	79,533	176,053	68.9%	$1,108,379	$2,461,652	69.0%
April	5	1,058	18,528	115,930	86.2%	$250,160	$1,555,288	86.1%
May	5	979	22,848	172,187	88.3%	$306,984	$2,372,216	88.5%
June	5	857	17,081	85,191	83.3%	$231,887	$1,197,019	83.8%
July	5	420	1,472	9,329	86.4%	$19,542	$131,821	87.1%
August	5	355	216	4,698	95.6%	$3,078	$66,695	95.6%
September	5	1,059	58,775	110,376	65.3%	$809,182	$1,593,212	66.3%
October	5	1,128	43,938	138,560	75.9%	$607,879	$2,030,343	77.0%
November	5	813	12,455	69,310	84.8%	$181,418	$1,008,934	84.8%
December	4	117	21	1,800	98.8%	$253	$22,571	98.9%
2019 Total	**59**	**10,595**	**404,272**	**1,133,730**	**73.7%**	**$5,565,590**	**$15,959,545**	**74.1%**
2020								
January	4	885	21,974	29,896	57.6%	$338,970	$507,653	60.0%
February	4	1,260	81,501	157,861	66.0%	$1,259,511	$2,343,444	65.0%
March	4	1,242	85,903	167,371	66.1%	$1,336,343	$2,480,422	65.0%
April	4	890	26,840	112,774	80.8%	$411,854	$1,688,812	80.4%
May	4	992	49,651	149,147	75.0%	$765,640	$2,292,917	75.0%
June	3	537	18,408	64,936	77.9%	$288,389	$1,003,135	77.7%
July	3	161	381	6,150	94.2%	$5,533	$84,315	93.8%
August	3	272	11,154	12,104	52.0%	$166,041	$198,252	54.4%
September	3	840	62,005	72,995	54.1%	$933,744	$1,107,610	54.3%
October	3	864	60,869	107,185	63.8%	$933,735	$1,610,031	63.3%
November	3	639	22,633	57,476	71.7%	$344,229	$863,640	71.5%
December	3	7	6	39	86.7%	$95	$547	85.2%
2020 Total	**41**	**8,589**	**441,325**	**937,934**	**68.0%**	**$6,784,084**	**$14,180,778**	**67.6%**
2021								
January	3	549	13,730	23,051	62.7%	$212,483	$363,402	63.1%
February	3	875	97,075	71,217	42.3%	$1,496,995	$1,118,936	42.8%
March	3	905	120,044	90,060	42.9%	$1,930,050	$1,428,663	42.5%
April	3	708	49,122	74,048	60.1%	$770,240	$1,160,028	60.1%
May	3	663	49,252	83,149	62.8%	$772,074	$1,327,403	63.2%
June	3	563	29,022	42,733	59.6%	$458,285	$676,317	59.6%
July	3	209	91	2,012	95.7%	$1,174	$28,659	96.1%
August	3	181	191	1,759	90.2%	$2,723	$24,816	90.1%
September	3	887	86,962	46,686	34.9%	$1,378,228	$780,672	36.2%
October	3	779	104,025	83,755	44.6%	$1,649,386	$1,356,715	45.1%
November	3	584	22,399	53,408	70.5%	$365,390	$856,667	70.1%
December	3	205	187	9,226	98.0%	$2,495	$126,584	98.1%
2021 Total	**36**	**7,108**	**572,100**	**581,104**	**50.4%**	**$9,039,523**	**$9,248,862**	**50.6%**

Source: Economic Data Reports, data compiled by AKFIN

[40] Electricity rates increased by 12.5 percent on April 1, 2024, which was the first rate increase in 30 years. According to contemporary reporting by KMXT, the rate increase was attributed by Kodiak Electric Association leadership to inflation and in anticipation of "decreasing revenue, mainly due to less electricity usage from fish processors in Kodiak." https://www.kmxt.org/news/2024-04-01/keas-board-of-directors-approve-utility-providers-first-rate-hike-in-three-decades-takes-effect-april-1 accessed 3/5/2025

Table 13-24 Utility Consumption and Costs by Month for Kodiak Shoreside Processors that Accepted RP Deliveries, 2019-2021 (nominal dollars)

Month	Number of Federal Processing Permits	Water		Electric	
		Gallons	Cost	Kilowatt Hours	Cost
2019					
January	5	17,170,620	$57,834	2,285,998	$377,423
February	5	126,758,660	$317,478	3,829,783	$590,461
March	5	110,523,940	$279,139	3,906,551	$539,488
April	5	56,000,237	$149,011	2,090,007	$342,509
May	5	37,953,139	$106,683	2,613,872	$423,830
June	5	28,010,440	$82,957	2,196,525	$370,707
July	5	52,974,298	$155,407	3,426,832	$525,069
August	5	100,908,756	$281,372	4,478,930	$708,760
September	5	85,625,859	$241,537	3,981,149	$601,650
October	5	68,266,560	$196,582	2,858,101	$456,598
November	5	18,771,540	$66,495	1,299,321	$226,233
December	4	3,066,180	$21,792	636,154	$112,032
2019 Total	**59**	**706,030,229**	**$1,956,287**	**33,603,223**	**$5,274,760**
2020					
January	4	4,430,680	$28,713	2,763,449	$277,652
February	4	76,215,660	$214,454	4,609,320	$530,437
March	4	100,868,880	$279,047	4,601,656	$552,621
April	4	51,896,790	$150,753	4,088,909	$466,491
May	4	29,507,430	$92,071	4,118,342	$436,857
June	3	37,037,000	$108,930	1,522,529	$254,739
July	3	17,462,500	$63,126	1,643,226	$279,345
August	3	47,256,700	$149,582	3,055,956	$478,802
September	3	74,437,470	$228,504	2,130,465	$340,684
October	3	68,845,230	$211,287	2,248,550	$345,635
November	3	20,697,400	$69,508	934,130	$155,935
December	3	2,737,700	$20,306	554,875	$93,822
2020 Total	**41**	**531,393,440**	**$1,616,281**	**32,271,407**	**$4,213,020**
2021					
January	3	24,307,010	$85,094	1,210,776	$202,868
February	3	56,960,880	$175,324	2,523,715	$399,731
March	3	103,187,880	$314,170	3,225,609	$495,525
April	3	60,818,810	$199,076	2,401,465	$389,160
May	3	33,809,830	$112,845	1,936,892	$316,566
June	3	23,898,180	$84,095	1,438,599	$242,651
July	3	22,599,660	$80,782	1,884,890	$305,247
August	3	50,655,010	$162,195	3,015,080	$462,449
September	3	73,547,100	$228,750	2,571,953	$404,868
October	3	76,912,660	$238,532	2,227,144	$357,096
November	3	46,074,583	$149,113	1,461,728	$243,314
December	3	8,803,320	$36,919	838,591	$137,458
2021 Total	**36**	**581,574,923**	**$1,866,895**	**24,736,442**	**$3,956,933**

Source: Economic Data Reports, data compiled by AKFIN

13.3.2 Central GOA Rockfish Longline Fishery Indicators

As noted in Section 5.2.1, the Central GOA rockfish entry-level longline fishery is open to hook-and-line, jig, troll, and handline gear. Although hook-and-line gear was used in the pre-RPP era,[41] available data show that since the implementation of the RP, only jig gear has been used in the entry-level longline fishery, as described below. Under the RP, a set number of metric tons is allocated to the Central GOA open access longline fishery. These limits have not constrained effort under RP and allocations to the entry-level longline fishery can be increased if the sector harvests 90 percent of their allocation the previous year (with varying caps by primary rockfish species[42]).

13.3.2.1 Central GOA Rockfish Jig CVs

Table 13-25 provides information on CVs that participated in the federal open access entry-level longline fishery using jig gear in the pre-RPP, RPP, and RP eras. Patterns of participation by community in the pre-RPP and RPP eras are described in the comprehensive 2020 Central GOA Rockfish Program Reauthorization SIA and that analysis is not recapitulated here. As shown in the table, since the implementation of the RP, only CVs with ownership addresses in Kodiak, Homer, and Wasilla have participated in this fishery with effort being Kodiak-centric. In the RP 2012-2018 era, one CV with a Homer ownership address participated in 2017 only, one CV with Wasilla address participated in 2017 and 2018, and two to seven CVs with Kodiak ownership addresses fished each year 2012-2018. During more recent years, jig CV effort became even more Kodiak-centric (outside of Kodiak, only one CV with a Homer address participated in one year [2021] only) while participation rates declined, with between one and three Kodiak vessels participating in each year of the RP 2019-2024 era, for annual average participation of 1.7 CVs with Kodiak ownership addresses per year.

Table 13-26 provides information to the extent possible within data confidentiality constraints on the ex-vessel gross value of landings of jig-caught Central GOA rockfish in the entry-level longline fishery. As shown, for all but one year 2019-2023 individual year data are confidential, but the annual average ex-vessel value for the 2019-2024 period was less than half of that of the 2012-2018 period.

[41] As described in the 2020 Rockfish Program Reauthorization SIA referenced in Table 2-1, 6 unique CVs with Alaska ownership addresses fished in the entry-level longline fishery in the pre-RPP (2003-2006) era using hook-and-line (HAL) gear: four from Homer and one each from Seldovia and Willow, with each participating in the fishery in one year only. One vessel from Lynden WA also fished HAL gear in one year only and one vessel with an unknown ownership address fished HAL gear in all four years.

[42] As described in 2017 Rockfish Program Review, in 2012, the allocation to the rockfish entry-level longline fishery was 5 mt for Northern rockfish, 5 mt for Pacific ocean perch, and 30 mt for pelagic shelf/dusky rockfish. If catch during a calendar year exceeds 90 percent of the allocation, then allocation in the following calendar year would increase by 5 mt for Northern rockfish, 5 mt for Pacific ocean perch, and 20 mt for pelagic shelf/dusky rockfish, except the maximum amount of TAC assigned to the RP (after deducting ICA) that may be allocated to the longline rockfish entry-level fishery is 2 percent for Northern rockfish, 1 percent for Pacific ocean perch, and 5 percent for pelagic shelf/dusky rockfish. In 2016, 90 percent of the 30 mt allocation of pelagic shelf/dusky rockfish was taken, resulting in an increased allocation of 50 mt beginning in 2017. As of 2024, the entry-level longline fishery has not taken 90 percent of the allocation of Northern rockfish or Pacific ocean perch and the entry-level allocations remain at 5, 5, and 50 mt for Northern Rockfish, Pacific ocean perch, and pelagic shelf/dusky rockfish, respectively.

Table 13-25 Jig CVs Targeting Central GOA Rockfish by Community of Vessel Historic Ownership Address, 2003-2024 (number of vessels)

Community	2003-2006 Annual Average	2007-2011 Annual Average	2012-2018 Annual Average	2019	2020	2021	2022	2023	2024	Annual Average 2019-2024 (number)	Annual Average 2019-2024 (percent)	Unique Vessels 2019-2024 (number)
Anchor Point	0.0	0.2	0.0	0	0	0	0	0	0	0.0	0.00%	0
Anchorage	1.3	0.4	0.0	0	0	0	0	0	0	0.0	0.00%	0
Chiniak	0.3	0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Homer	0.8	0.2	0.3	0	0	1	0	0	0	0.2	9.09%	1
Kodiak	9.8	2.8	3.6	3	2	1	2	1	1	1.7	90.91%	4
Old Harbor	0.0	0.2	0.0	0	0	0	0	0	0	0.0	0.00%	0
Ouzinkie	0.5	0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Port Lions	0.3	0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Wasilla	0.0	0.2	0.3	0	0	0	0	0	0	0.0	0.00%	0
Alaska	12.8	4	4.1	3	2	2	2	1	1	1.8	100.00%	5
Washington	1.8	0.4	0.0	0	0	0	0	0	0	0.0	0.00%	0
Oregon/Other Sta	1.3	0.4	0.0	0	0	0	0	0	0	0.0	0.00%	0
Grand Total	15.8	4.8	4.1	3	2	2	2	1	1	1.8	100.00%	5

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

Table 13-26 Jig CV's Ex-Vessel Value from Central GOA Targeted Rockfish by Community of Vessel Historic Ownership Address, 2003-2023 (2023 dollars)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	Annual Average 2019-2023 (dollars)	Annual Average 2019-2023 (percent)
Alaska	10,245	4,358	9,180	5,351	*	*	*	*	3,613	100.00%
Other States	5,750	505	0	0	0	0	0	0	0	0.00%
Total	15,996	4,863	9,180	5,351	*	*	*	*	3,613	100.00%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

13.3.2.2 Shoreside Processors Accepting Jig-Caught Central GOA Rockfish Deliveries

Table 13-27 provides information on the distribution of shoreside processors that accepted jig-caught Central GOA rockfish deliveries 2003-2024. While processing occurred in Akutan, King Cove, Kodiak, and Sand Point during the pre-RPP years, during the RPP years processing only took place in Kodiak and in Kodiak and King Cove during the RP years. The King Cove processor did not accept deliveries of jig-caught Central GOA rockfish after 2020, the plant closed in 2024, and its future remains uncertain. Although processing of jig-caught Central GOA rockfish occurred in Kodiak every year 2019-2024, that annual average number of shoreside plants participating in the fishery was less than the annual average number participating in the pre-RPP and RPP eras as well as in the 2012-2018 RP years.

Table 13-28 provides information on the first wholesale value of jig-caught Central GOA rockfish deliveries to shoreside processors by community of processor operation. As shown, the annual average wholesale value for 2019-2023 was approximately one-third of the 2012-2018 annual average, two-thirds of the RPP era average, and about one-quarter of the pre-RPP era average.

Table 13-27 Shoreside Processors Accepting Jig-Caught Central GOA Targeted Rockfish Deliveries by Community of Operation, 2003-2024 (number of processors)

Community	2003-2006 Average	2007-2011 Average	2012-2018 Average	2019	2020	2021	2022	2023	2024	Annual Average 2019-2024 (number)	Annual Average 2019-2024 (percent)	Unique Processors 2019-2024 (number)
Akutan	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
King Cove	1.0	0.0	1.0	1	1	0	0	0	0	0.3	8.70%	1
Kodiak	8.0	5.6	6.3	4	4	3	3	3	4	3.5	91.30%	6
Sand Point	1.0	0.0	0.0	0	0	0	0	0	0	0.0	0.00%	0
Grand Total	11.0	5.6	7.3	5	5	3	3	3	4	3.8	100.00%	7

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

Table 13-28 First Wholesale Value of Jig-Caught Central GOA Targeted Rockfish Deliveries to Shoreside Processors by Processor Community of Operation, 2003-2024 (in 2023 dollars)

Community	2003-2006 Annual Average	2007-2011 Annual Average	2012-2018 Annual Average	2019	2020	2021	2022	2023	Annual Average 2019-2023 (dollars)	Annual Average 2019-2023 (percent)
Kodiak	48,860	28,815	*	*	*	*	*	*	*	*
Other Alaska	3,701	0	*	*	*	*	*	*	*	*
Total	52,560	28,815	35,819	13,435	33,393	9,768	1,114	5,446	12,631	100.00%

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

13.4 Community and Social Outcomes of the RP

The 2020 RP Reauthorization and 2017 RP Program Review SIAs (links for both of which are provided in Table 2-1) contain extensive information on the community context of the RP fisheries including comprehensive community and relevant local sector profiles and data summaries both in the main body of the documents and their attachments. More recent fishery-oriented community context information may be found in the Annual Community Engagement and Participation Overview (ACEPO) produced by the Alaska Fisheries Science Center (AFSC).[43]

Given that the scope of this fishing community/SIA component of the current program review is much narrower than the previous comprehensive SIAs, focusing on what has changed (or has not changed) at the community and regional level since the 2020 Central GOA RP Reauthorization analysis, the contents of these readily available community context resources are incorporated by reference and are not recapitulated here. Instead, this section focuses on outcomes relative to the program elements that were designed as, or have served to function as, community and regional protection measures. Further, this section focuses on the primary RP communities of Kodiak, the Seattle MSA, and Newport/Lincoln County Oregon.

13.4.1 Kodiak

Among communities substantially engaged in, and/or substantially dependent on the CGOA rockfish fisheries managed under the RP, Kodiak is the most centrally engaged in and dependent on the fishery as

[43] Available at: https://shinyfin.psmfc.org/aceporeport/

measured by multiple indices. Kodiak has experienced beneficial impacts across harvester, processor, and fishery support service sectors because of the implementation of the RP and has specifically benefitted from several community protection measures built into the program. Although not all individual operations benefitted equally from the change in qualifying years between the RPP and the RP and therefore changes in the pattern of initial QS allocations under the two programs, especially when compared to pre-RPP conditions, no substantial adverse sector-level or community-level impacts resulting from the implementation of the RP have been identified for the community of Kodiak. The subsections below provide information specific to the Kodiak trawl CV, shoreside processing, and entry-level fishery sectors.

13.4.1.1 Kodiak Trawl CV Sector

In terms of CGOA rockfish trawl CV ownership as measured by ownership address, between the initial RP years 2012-2018 to the more recent RP years 2019-2024, Kodiak has benefitted from an increase in the annual average number CVs active in the fishery (from 12.3 to 14.2 to CVs) and percentage of all CVs active in the fishery (from 45.0 to 58.6 percent). However, there has been a trend of decline in the annual number of Kodiak CVs active in the fishery during the 2019-2024 era. The Kodiak CV percentage of all real ex-vessel gross revenue for all CVs active in the fishery was also up (from 46.5 to 57.8 percent), however absolute value in dollars has declined in recent years. Similarly, the dependency of Kodiak CVs on RP ex-vessel gross revenue compared to all ex-vessel gross revenue increased (from 13.4 to 15.5 percent). However, the increased dependence on Central GOA rockfish, even when average rockfish revenue declined in recent years indicates that revenue from other fisheries was decreasing at a greater rate.

In terms of QS ownership, between 2012 and 2025, Kodiak experienced gains in percentage of total QS owned for all three primary rockfish species included in the RP. Kodiak also experienced gains in the ownership of unique LLP licenses with RP QS between the 2012-2018 and 2019-2024 periods. Depending on the inclusion or exclusion of one LLP license with QS that switched ownership to Seattle in two non-consecutive years, ownership of LLP licenses with QS with Kodiak ownership addresses has increased either 22 or 28 percent between 2019 and 2024 (with all or all but one transfer of LLP licenses being to Kodiak rather than from Kodiak during this period). As of 2024, 15 of the 18 CVs active in the RP fishery were homeported in Kodiak, including three CVs with out-of-state ownership addresses.

With respect to CV crew employment and earnings, available EDR data suggest that in 2019-2021 Kodiak residents comprised the large majority of crew on Kodiak ownership address CVs and a significant percentage of crew on CVs with ownership addresses in other states (albeit 2020 data are anomalous due to the COVID pandemic). Due to the discontinuation of GOA trawl EDR data collection program no similar data are available for 2022-2024.[44]

In combination, these data all suggest that the RP has continued to be successful in its CV-related community protection measures for Kodiak on multiple levels. However, factors external to the RP and the Central GOA rockfish fishery (discussed in Section 8.3) are having negative impacts on the Central GOA rockfish fishery and other fisheries upon which Kodiak is dependent. In this context, while the RP fisheries make up a relatively modest portion of the relatively diverse fishing portfolios of Kodiak CVs

[44] See 88 FR 7586 for the final rule eliminating the GOA trawl EDR effective March 8, 2023. The GOA Trawl EDR was implemented on January 1, 2015 (79 FR 71313, December 2, 2014) and codified in regulation at 50 CFR 679.110. The initial GOA Trawl EDR submissions were due June 1, 2016, for reporting 2015 calendar year data. The GOA Trawl EDR was implemented to collect relevant baseline information that could be used to assess the impacts of a future catch share program on affected harvesters, processors, and communities in the GOA. However, Council action on a catch share program that addressed issues with GOA bycatch management was suspended in December 2016, and no catch share program currently exists for GOA harvesters, processors, and communities.

engaged in the RP, the RP has what may appear to be of outsized importance to these vessels due to its performance relative to that of other fisheries and the place it has in the annual round of fisheries where it keeps vessels active in what would be otherwise slow times of the year, increasing overall operational efficiency.

13.4.1.2 Kodiak Shoreside Processing Sector

In terms of the shoreside processors operating in Kodiak that accepted CGOA trawl-caught rockfish landings, between the initial RP years 2012-2018 to the more recent RP years 2019-2024, Kodiak has seen a decrease in the annual average number processors active in the fishery (from 6.6 to 4.2 plants), but all shoreside processing in the RP fishery has taken place in Kodiak every year 2012-2019.[45] In the 2019-2024 period, five plants were engaged in the fishery in 2019 before dropping to four in 2020 and remaining at that level through 2024.

Kodiak shoreside processors shared 100 percent of the first wholesale value derived from trawl-caught Central GOA rockfish deliveries since the implementation of the RP (2012-2023). The annual average value for Kodiak shoreside processors derived from Central GOA trawl-caught rockfish progressively increased during the pre-RPP, RPP, and initial RP (2012-2018) eras (at 10.4, 18.9, and 24.5 million dollars, respectively), it has declined somewhat in more recent years (averaging 22.8 million 2019-2023) although in two out of three of the most recent years covered by the data (2021-2023) annual values exceeded the annual average value for 2012-2018. Dependency of Kodiak shoreside processors participating in the RP fisheries on Central GOA trawl-caught rockfish first wholesale gross revenue compared to all fisheries first wholesale gross revenue has progressively increased during the pre-RPP, RPP, initial RP (2012-2018), and recent RP (2019-2023) eras (from 2.4 to 6.9 percent). However, the increased dependence on Central GOA rockfish, even when average rockfish revenue declined in recent years, indicates that revenue from other fisheries was decreasing at a greater rate. Additionally, it is important to note that the RP has been successful in increasing efficiency in the shoreside processing plants in Kodiak by making it feasible to move rockfish processing out of the peak summer salmon processing period and to fill underutilized capacity that has resulted from decreased flatfish processing after the pollock and Pacific cod A seasons.

With respect to Kodiak shoreside processing employment and earnings, available EDR data suggest that in 2019-2021, Kodiak residents (i.e., those processor employees not living in processor-provided housing) comprised the majority of processing crew workers and earnings at shoreside processing plants engaged in the RP fisheries, although the percentage of local workers and earnings fluctuated throughout year, consistent with the ebb and flow of fishery seasons. Kodiak is unique among southwest Alaska communities with large, multi-species shoreside processing plants, as typically virtually all processing crew workers live in processor-supplied housing in enclave-style developments in those communities, which can serve to limit ongoing social and economic interactions between processing crew and the population of the community living in non-worksite residential areas. Due to the discontinuation of GOA trawl EDR data collection program no similar data are available for 2022-2024.

It is also important to note that there has been a considerable amount of ownership change and consolidation of Kodiak shoreside processing plants engaged in RP fisheries over the 2012-2024 period.

[45] As noted earlier, during the pre-RPP years covered by the data used in this analysis (2003-2006), at least some level of Central GOA trawl-caught rockfish shoreside processing occurred Akutan, King Cove, Ninilchik, Sand Point, and Seward.

- In December 2014, Trident Seafoods, affiliated with the Star of Kodiak Rockfish Cooperative, acquired Western Alaska Fisheries, which was affiliated with the Western Alaska Fisheries Rockfish Cooperative. Both cooperatives remained active as of 2024.
- In October 2024, Pacific Seafoods, which was affiliated with the Pacific Rockfish Cooperative from 2012-2021 but not with any rockfish cooperative 2022-2024, acquired Trident's Kodiak operations.
- In June 2016, Silver Bay Seafoods acquired some of International Seafoods of Alaska (ISA) assets in Kodiak. In February 2020, Silver Bay acquired the ISA Kodiak shoreside processing plant, which was affiliated with the I.S.A. Rockfish Cooperative, and replaced that cooperative with their own Silver Bay Seafoods Rockfish Cooperative that same year.
- In 2017, Global Seafoods, affiliated with the Global Rockfish Cooperative, went out of business and the Global Rockfish Cooperative disbanded.
- North Pacific Seafoods, affiliated with the North Pacific Rockfish Cooperative, and OBI, affiliated with the OBSI Rockfish Cooperative, are the only continuously operating Kodiak shoreside processors involved in the RP every year 2012-2024 that, as of February 2025, have not been on either end of a local consolidation transaction.

In combination, these data all suggest that the RP has continued to be successful in its shoreside processor-related community protection measures for Kodiak on multiple levels. However, as noted in the Kodiak CV sector summary, factors external to the RP and the Central GOA rockfish fishery (discussed in Section 8.3) are having negative impacts on the Central GOA rockfish fishery and other fisheries upon which Kodiak CVs are dependent. The same holds true for Kodiak shoreside processing sector as well. In this context, as in the case of Kodiak CVs engaged in the RP fisheries, while the RP fisheries make up a relatively modest portion of the relatively diverse processing portfolios of Kodiak shoreside processors engaged in the RP, the RP has what may appear to be of outsized importance to these processors due to its performance relative to that of other fisheries and the place it has in the annual round of fisheries where it keeps the plants active in what would be otherwise slow times of the year, increasing overall operational efficiency.

It is also important to note that Amendment 113, which was effective in September 2024, will potentially help make processing operations more efficient for Kodiak shoreside processors engaged in the RP fisheries by moving the start of the Central GOA RP fishery to April 1, which would allow for a further evening out seasonal processing peaks and valleys and by providing Kodiak processors more flexibility by increasing processing caps, which may prove increasingly important if trend of consolidation in the sector continues. The change in harvest calculations under Amendment 113 will also potentially benefit CVs, fishery support service providers, and the community at large by effectively allowing the CV fleet to more fully utilize Northern and dusky rockfish TACs, which would create more value for all involved. These changes may also help maintain higher processor utilities demand in what would otherwise be slow periods of the year.

13.4.1.3 Central GOA Rockfish Federal Open Access Longline Entry-Level Fishery

The Central GOA rockfish entry-level longline fishery has been exclusively pursued using jig gear since the implementation of the RP. While multiple other Alaska communities were involved in the fishery during the pre-RPP and RPP eras,[46] during the RP 2012-2018 period all CVs participating in the fishery had Kodiak ownership addresses, except for two Homer address vessels that participated in the fishery 2017 and one Wasilla address vessel that participated in the fishery in 2017 and 2018. During the 2019-2024 period, all CVs participating in the fishery had Kodiak ownership addresses, except for one Homer

[46] Anchor Point, Anchorage, Chiniak, Homer, Old Harbor, Ouzinkie, Port Lions, and Wasilla each had at least one local ownership address CV participate in the fishery at least one year 2003-2011.

address vessel that participated in the fishery in one year (2021). The fishery produced an annual average total ex-vessel gross value of $9,200 in 2012-2018 and $3,600 in 2019-2023.

During the 2012-2017 period, an annual average of 3.6 Kodiak jig CVs participated in the fishery, while in the 2018-2024 period an annual average of 1.7 did so. In the four most recent years covered by the data (2021-2024), one Kodiak CV participated in the fishery in three of the four years and two Kodiak CVs participated in the fishery the other year.

During the 2012-2018 period, an annual average of 6.3 shoreside processors in Kodiak accepted jig-caught Central GOA rockfish deliveries and 1.0 in King Cove did so. During the 2019-2024 period one King Cove shoreside processor accepted jig-caught Central GOA rockfish in 2019 and 2020 only (for an annual average of 0.3), while in three Kodiak processors did so 2021-2023 and four Kodiak processors did so in 2019, 2020, and 2024 (for an annual average of 3.5). The annual average first wholesale value of product produced from jig-caught Central GOA deliveries was $35,800 for 2012-2018 and $12,600 for 2019-2023.

It is not possible to determine the cause of the decline in participation in the entry level longline fishery with existing data. It is unlikely, however, that the decline is directly attributable to the RP itself, for several reasons, including; participants in the entry level longline fishery are no longer required to register; landing restrictions have been eased such that CVs may deliver their harvest to any shoreside processing facility in any community in the GOA; CVs participating in this fishery are not subject to fees related to the cost recovery program implemented under the RP, such that there are no known increases in operational expenses to longline vessels attributable to the program; RP catch limitations have not constrained the longline entry level fishery; and in the one instance that the step-up mechanism that increases the sector's apportionment was triggered, it was successfully employed before the fishery was constrained.[47]

13.4.2 Seattle MSA

The Seattle MSA was substantially engaged in the Central GOA RP trawl fishery in several ways over the period 2019-2024. Few changes have occurred in the nature and magnitude of that engagement, and no substantial community-level impacts resulting from the implementation of, or subsequent changes to, the RP have been identified.

The Seattle MSA experienced decreases in annual average local ownership address RP rockfish trawl CV participation between the 2012-2018 and 2019-2024 periods, with accompanying decreases in ex-vessel gross revenue and relative dependency on Central GOA rockfish. The Seattle MSA also experienced a minor decrease in the annual average number of local ownership address CV LLP licenses between the 2012-2018 and 2019-2024 periods but benefitted from an increase in annual average Seattle MSA ownership address CV QS for all three primary rockfish species.

The Seattle MSA experienced decreases in annual average local ownership address RP rockfish trawl CP participation between the 2012-2018 and 2019-2024 periods, with accompanying decreases in ex-vessel gross revenue and relative dependency on Central GOA rockfish. The Seattle MSA also experienced a decrease in annual average Seattle MSA ownership address CV LLP licenses between the 2012-2018 and 2019-2024 periods, but no changes have been seen in the 2019-2024 period. The Seattle MSA

[47] As noted earlier, in 2016, 90 percent of the 30 mt allocation of dusky rockfish was taken, resulting in an increased allocation of 50 mt in 2017. As of 2019, the entry level longline fishery has not taken 90 percent of the allocation of Northern rockfish or Pacific ocean perch and the entry level allocations remain at 5, 5, and 50 mt for Northern rockfish, Pacific ocean perch, dusky rockfish, respectively.

experienced a decrease in annual average local ownership address CP QS for all three primary rockfish species. All Seattle MSA CP revenue data are confidential.

13.4.3 Newport and Lincoln County, Oregon

Newport has been engaged in the RP trawl fishery primarily through CV ownership. While changes occurred during the 2012-2018 period, no substantial community-level impacts resulting from the implementation of, or subsequent changes to, the Rockfish Program have been identified.

In terms of catcher vessel ownership, Newport experienced progressive decreases in annual average local ownership address CGOA rockfish trawl CVs over the pre-RPP, RPP, RP 2012-2018, and RP 2019-2024 periods. It has also experienced a decrease in average annual RP ex-vessel gross revenue between the 2012-2018 and 2019-2023 periods. However, Newport and Lincoln County experienced an increase in local QS ownership for all three primary rockfish species in the RP between 2012 and 2025. Although there was some movement of individual CV LLP licenses with QS, Newport and Lincoln County had the same number of LLP licenses in 2024 as they had in 2018

13.4.4 Alaska Communities Substantially Engaged in and/or Dependent on Halibut and Chinook Salmon Fisheries

One of the goals of the RP is to reduce/minimize halibut and Chinook salmon PSC. To the extent that the program has achieved those goals, indirect benefits may accrue over time to those communities substantially engaged in and/or substantially dependent upon the GOA halibut and/or Chinook salmon subsistence, commercial, sport charter, and/or personal use fisheries.[48] The communities involved in those halibut or Chinook fisheries would potentially benefit relative to the degree that Central GOA PSC reductions would benefit the GOA halibut and/or Chinook salmon stocks (and, in the case of commercial or charter halibut fisheries, the incidental allocative effects, if any, between sectors). Assessing the probability and magnitude of types of indirect beneficial impacts of halibut and/or Chinook PSC reductions and the identification of GOA communities (or other area communities) to which those types of beneficial impacts would most likely accrue is, however, beyond the scope of this program review.

13.4.5 Risks to Fishing Community Sustained Participation in the Central GOA Rockfish Trawl or Entry-Level Longline Fisheries

No issues associated with the RP were identified that would put the sustained participation of any fishing communities (i.e., those substantially engaged in or substantially dependent upon the Central GOA rockfish trawl or longline fisheries) at risk.

[48]See Section 6.1 for Chinook PCS reduction achievement information and Section 6.2 for Halibut PSC reduction achievement information related to the RP.

14 Fishing Vessel Safety

National Standard 10 states that "conservation and management measures shall, to the extent practicable, promote the safety of human life at sea." In response to National Standard 10, one of the stated goals of the RPP and RP was to improve safety at sea.

Management of the rockfish fisheries under the RPP and RP extended the fishing season and moved much of the fishing from July to May and June,[49] but also allowed for fishing in late fall when Central GOA weather conditions can be less safe. Although a person's allocation will not be jeopardized by decisions to delay fishing to reduce safety risks, some incentives may exist for persons to fish in inclement weather - including market opportunities and operational cost savings (North Pacific Fishery Mangement Council, 2011).

The National Institute for Occupational Safety and Health (NIOSH) manages the Commercial Fishing Incident Database (CFID). CFID is a national surveillance system that contains information on work-related fatalities and vessel disasters in the U.S. fishing industry. For Alaska, CFID contains fatality data from 2000 through 2023 and vessel disaster data from 2000 through 2023. One limitation is that these data sources do not include other safety metrics, including nonfatal injuries, vessel system failures not resulting in abandonment, and search-and-rescue missions.

NIOSH staff was provided a list of vessels that the AKFIN summary of CAS data indicated were active in the Central GOA rockfish fishery from 2003 through 2023. The list of Central GOA rockfish vessels was matched with all fishing vessels that had been added to CFID as the result of:

1. one or more crewmember fatalities that occurred on or otherwise involved the vessel or
2. if the vessel sunk, capsized, or sustained other damage that required the entire crew to abandon the vessel.

The list of vessels was considered in terms of the Central GOA management program(s) they fished under, so the same three groupings of years were considered in this section as other sections of this paper:

1. pre-RPP (2003 through 2006),
2. RPP (2007 through 2011), and
3. RP (2012 through 2023).

Based on vessel name, casualty date, and casualty location, it was determined that there were no work-related crewmember fatalities or vessel disasters among vessels when actively participating in the Central GOA rockfish fishery during the pre-RPP, RPP, or the RP. One potential reason for the good record of safety of human life at sea could include the extended fishing season that would reduce race-for-fish conditions and allow captains to choose when to operate in the event of inclement weather or crewmember fatigue.

[49] Changing the start date to April is expected to increase catch earlier in the year.

15 Reductions in Sea Floor Contact

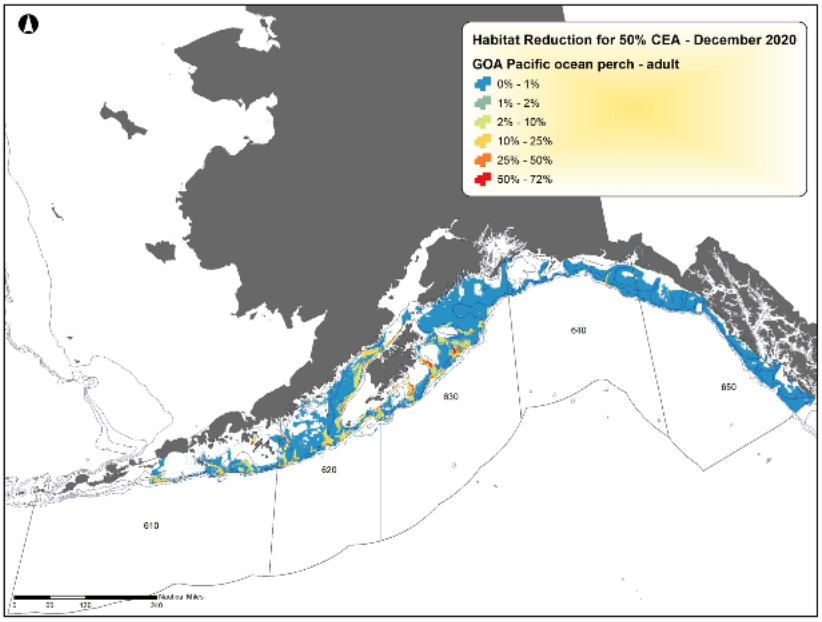
The RPP and RP aimed to reduce trawl gear impacts on the sea floor and the living organisms. Information presented in this section incorporates information presented in past Central GOA RP Reviews by reference and provides new information based on the 2022 Evaluation of Fishing Effects on Essential Fish Habitat report (Zaleski, Smeltz, Rheinsmith, Pirtle, & Harrington, 2022). That report utilized information from the updated 2022 Fishing Effects Model.

Essential fish habitat (EFH) is the area containing the top 95 percent of occupied habitat (defined as model estimated encounter probabilities greater than 5 percent) from a Species Distribution Model ensemble fitted to distribution and abundance in AFSC Resource Assessment and Conservation Engineering-Groundfish Assessment Program (RACE-GAP) GOA summer bottom trawl surveys (1993–2019). The top 50 percent of the EFH area is defined as the Core EFH Area (CEA).

The three primary GOA RP species are considered in this section. Three figures are provided for each species. The figures show the habitat reduction for the 50 percent CEA, the percentage of habitat disturbance (2003 through 2021), and the adult population in the top 50 percent of the EFH area. The percentage of habitat disturbance is less than 5 percent and is steady or declining for all three species. Habitat reduction tends to be less than 1 percent in most areas, but the highest habitat reduction levels focus on the same general areas for all species.

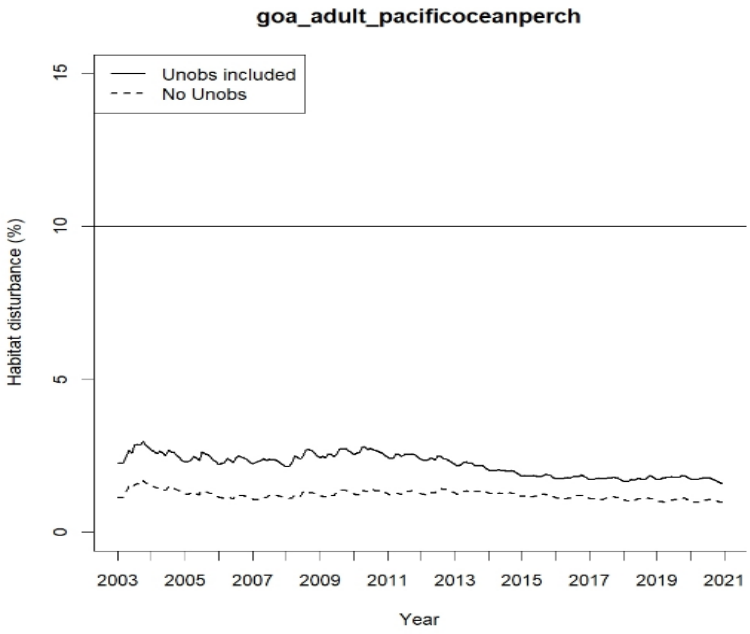
Because of the gear costs and the rocky habitat these species prefer, there are economic incentives to avoid bottom contact to the extent practicable when fishing for the primary rockfish species. Slowing the fishery appears to have resulted in modest improvements in reducing sea floor contact and the associated negative impacts on EFH.

Figure 15-1 Pacific ocean perch percentage habitat reduction for 50 percent CEA



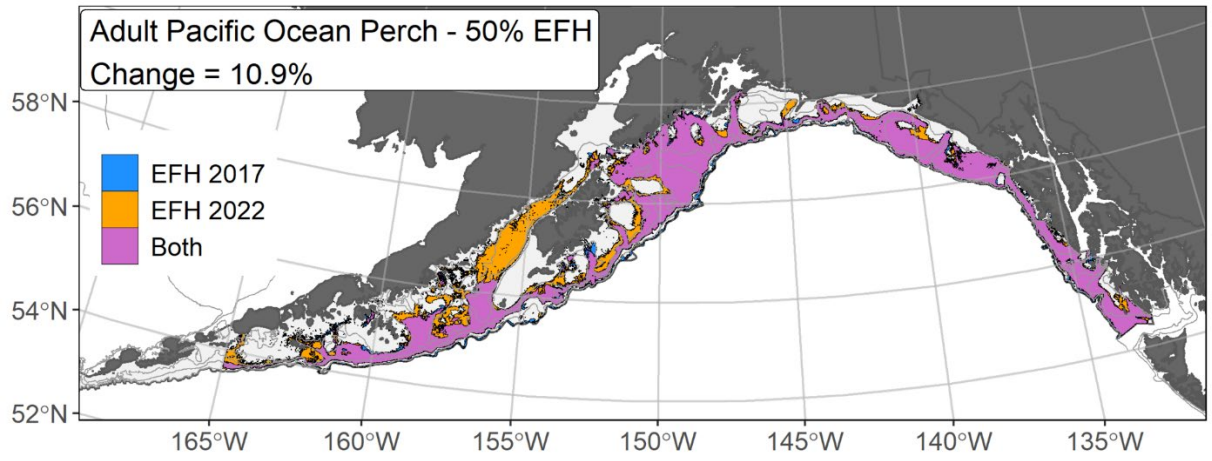
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-2 Pacific ocean perch percentage of habitat disturbance 2003 through 2021



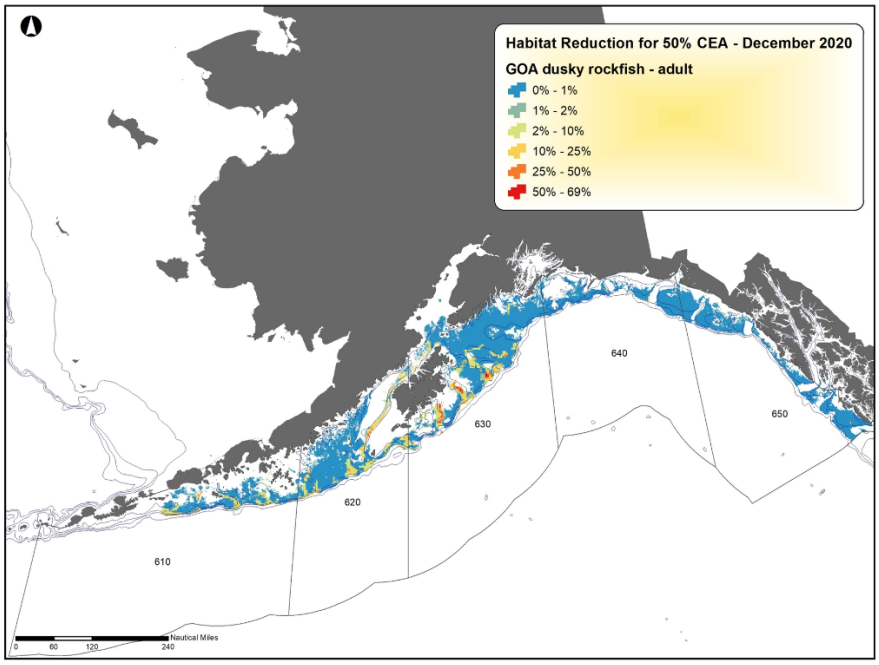
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-3 Adult Pacific ocean perch top 50 percent of the occupied area GOA (core EFH area)



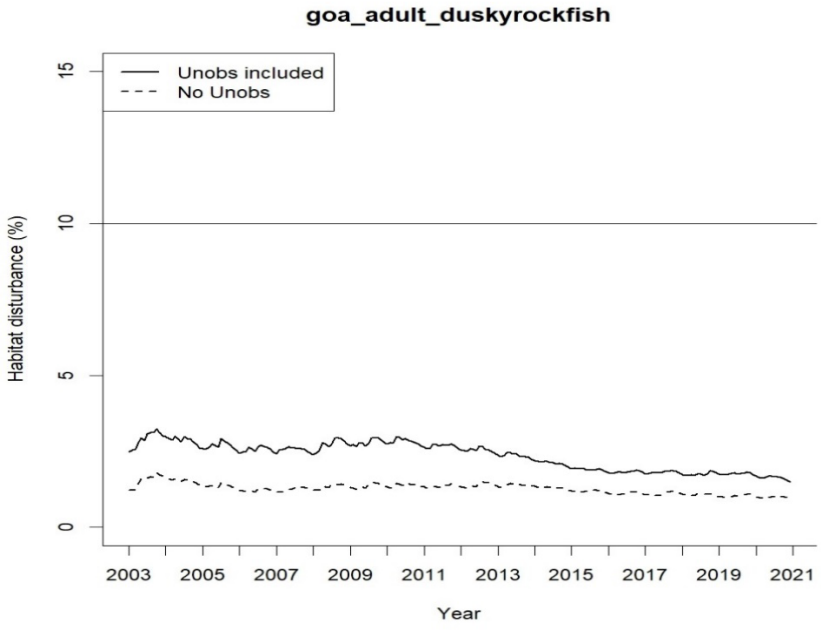
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-4 Dusky rockfish percentage habitat reduction for 50 percent CEA



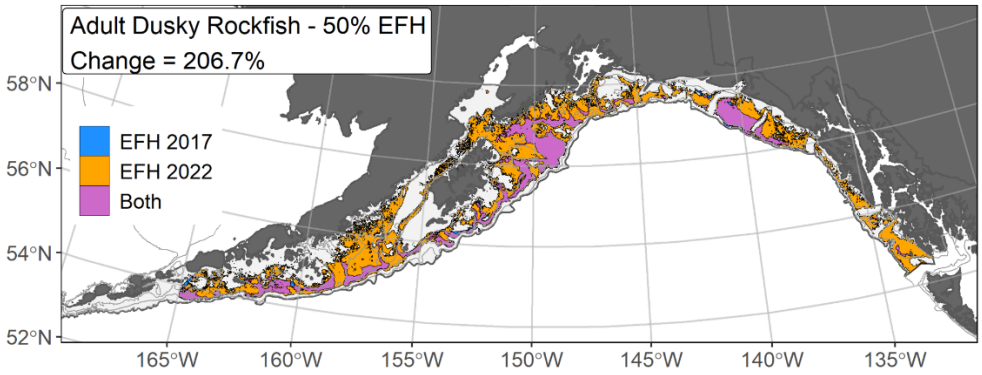
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-5 Dusky rockfish percentage of habitat disturbance 2003 through 2021



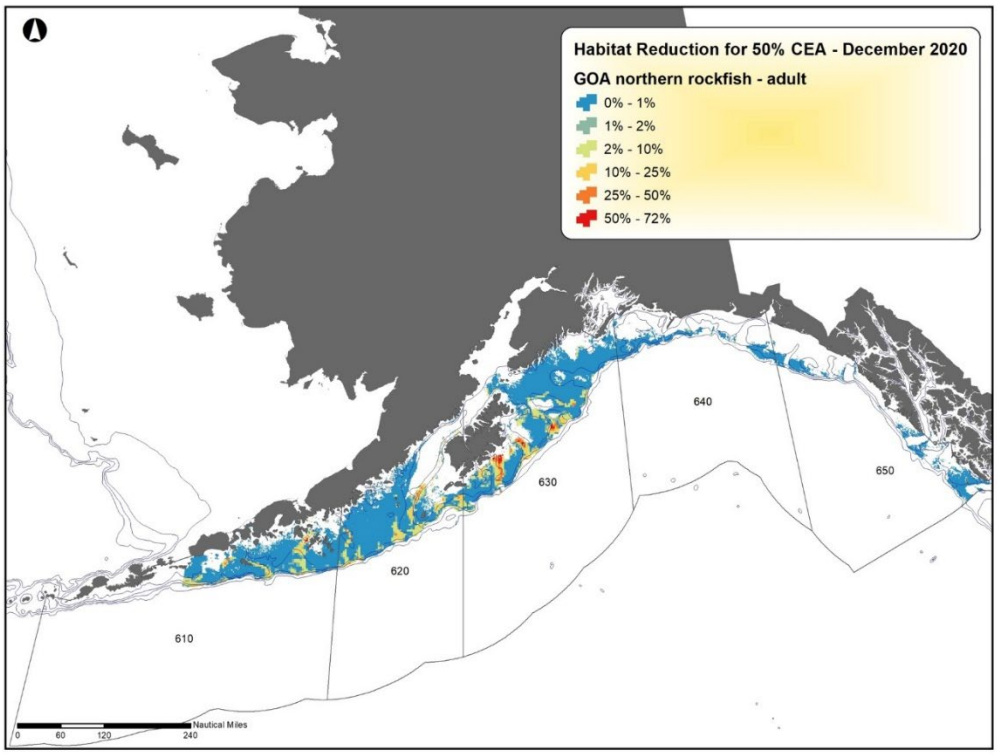
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-6 Dusky rockfish top 50 percent of the occupied area GOA (core EFH area)



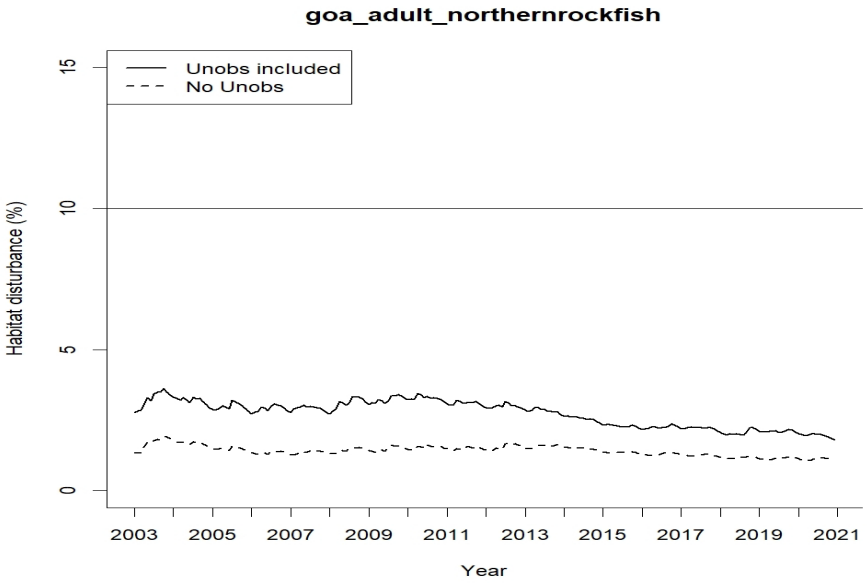
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-7 Northern rockfish percentage habitat reduction for 50 percent CEA



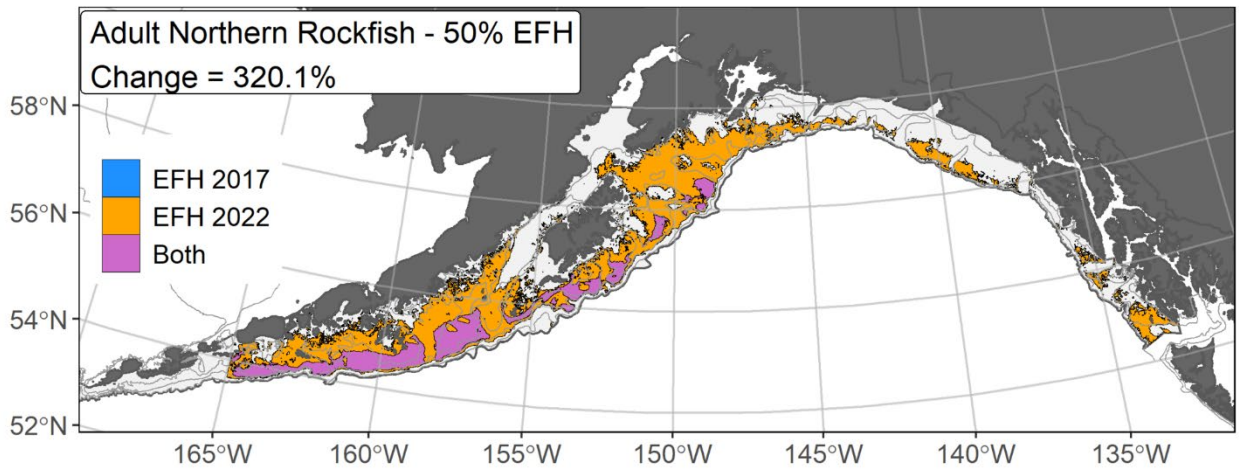
Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-8 Northern rockfish percentage of habitat disturbance 2003 through 2021



Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

Figure 15-9 Northern rockfish top 50 percent of the occupied area GOA (core EFH area)



Source: https://app.box.com/s/m0hxi7d2vz3wgg0a515hm8dnczr7reg2

16 Impact on Management Agencies

This section describes the impacts of implementing the RP realized by the various management agencies. Staff[50] of the Alaska Department of Fish and Game (ADF&G) indicated that implementing the RP had negligible impacts on their agency. As a result of those discussions, a separate subsection focused on ADF&G is not included in this section.

16.1 NMFS

In March 2025, the NMFS Alaska Regional Office Catch Monitoring and Control Plan (CMCP) Specialist in Kodiak retired and there are currently no plans to backfill that position, which will reduce some of the cost burden placed on the industry by cost recovery for the position. This position supported accurate catch sorting and species identification for managing the RP. As a result of this change, NMFS will have to rely on other sources to verify catch information used for management. This change to NMFS staffing coincides with an industry-led pilot project funded by the National Fish and Wildlife Fund (NFWF) that is kicking off in April 2025 to place shoreside samplers who hold a valid certification from the Observer Program at the rockfish processors and determine whether electronic monitoring (EM) could replace the need for at-sea observers. The Council has previously written a letter to NFWF to support this pilot project, which is the first phase of this project to explore how EM could be implemented in the RP.

The reduction in NMFS staff in Kodiak combined with the industry-led pilot project may provide the opportunity for the Council to modernize regulations to meet changing monitoring objectives and support industry-led efforts to expand EM to the rockfish processors and CVs targeting rockfish.

NMFS and industry have a long track record of evaluating the use of EM in the RP. In the mid-2000's, a series of pilot projects in the GOA rockfish fishery evaluated the use of video to quantify the amount (in weight) of halibut discarded from trawl catcher vessels (Bonney & McGauley, 2008), (Bonney, Kingsolving, & McGauley, 2009) The EM pilot projects sought to reduce the necessary at-sea observer days while still accomplishing the vessel-specific accounting of halibut bycatch. The pilot projects were able to demonstrate that EM could be used reliably in Alaska on a variety of vessels and that it was possible to quantify halibut discards from a single discard location. However, at that time, there was insufficient economy of scale to make an EM approach less expensive than the required 100% observer coverage. The cost for EM (equipment and video review) and the delay of information needed by both NMFS and industry meant that an EM approach was not viable.

Since then, NMFS and the Council have incorporated EM into the suite of monitoring tools used for managing Alaska fisheries. In 2018, EM was added as an option in lieu of observer coverage in the fixed gear fleet (82 FR 36991). EM is used to estimate catch and discards in that fishery. In 2025, NMFS is implementing a regulated EM program in the pollock fishery (89 FR 60796) and EM is used as a compliance monitoring tool to verify compliance with a maximized retention requirement. In this scenario, EM is combined with observers who sample in the shoreside processing plant. Based on the early experiments with EM in the rockfish fishery and the lessons learned from implementing EM in other fisheries in Alaska, there are two general approaches for how EM could be incorporated into the Rockfish Program. These approaches present initial ideas for discussion and are not exhaustive. One approach would function similarly to the pollock trawl EM program by utilizing EM to verify full catch retention combined with shoreside observer coverage. This approach could likely apply to both pelagic and nonpelagic trawl gear. A second approach would be to integrate a discard chute for halibut PSC that would allow halibut discarded at-sea to be estimated. While there is potential for allowing discards in the Rockfish Program under EM, there would likely be stringent catch handling requirements to ensure

[50] Personal communication with Trent Hartill

monitoring needs are met. These approaches could potentially be combined, or considered alongside any other recommendations made by the Council.

If the Council were to recommend further analysis of EM in the RP as outlined in the first approach, then the framework of the trawl EM category could be applied to the RP, allowing for potential benefits such as:

- Increased accuracy of catch estimation at the shoreside processor;
- Verification of species sorting and reported landing report data;
- Increased observer safety by shifting from vessels to the shoreside processor; and
- Potential for lower cost burden to the industry.

In addition to the potential benefits, there are also some potential concerns:

- Timeliness of data would change due to the time lag of hard drives being sent from the vessel to the reviewers and review times; and
- Full retention of catch may lead to landing traditionally unmarketable fish such as giant grenadier (*Albatrossia pectoralis*).

If EM proves to be a viable approach for the RP, then regulatory changes would be necessary to incorporate EM in the rockfish fishery. These regulations would define the monitoring requirements to meet management needs.

Opportunities for Regulatory Streamlining

Regulations at 50 CFR 679.28(g)(8), pertaining to the CMCP Specialist, could be considered for removal since these were utilized by local staff to ensure compliance with regulations during rockfish offloads. Additionally, if the Council chooses to proceed with EM in the Rockfish Program, NMFS will streamline existing regulations as necessary to comply with the Unleashing Prosperity Through Deregulation order that states "unless prohibited by law, whenever an executive department or agency publicly proposes for notice and comment or otherwise promulgates a new regulation, it shall identify at least 10 existing regulations to be repealed."

16.2 NPFMC

RP and RPP impacts on the NPFMC fall into three basic categories: reviewing cooperative reports, undertaking required program reviews, and developing EA/RIRs as necessary. Each of the three categories is described in the following sections.

16.2.1 Review Cooperative Reports

Annually, typically in April, the NPFMC receives reports from RP Cooperatives. Those reports are voluntary and may also be presented during the Council meeting and provide an opportunity for the Council and stakeholders to monitor the cooperatives' progress in meeting the program's goals and objectives. During the annual review, any issues that arose during the year could be noted and addressed either under that agenda item or staff tasking. The NPFMC has not identified substantial problems during review of cooperative reports to date.

The RP cooperative reports are generally scheduled as part of several LAPP cooperative reports. The agenda item is expected to take about four hours, with the RP portion of the cooperative reports taking an

hour or less of the Council's time. The fishing industry generates these reports, and the only time required for staff is to review the presentations and coordinate their submission to the Council.

16.2.2 Required Program Reviews

This is the third required Central GOA RPP/RP review conducted by the NPFMC. Each review requires a significant amount of staff time to complete to address specific issues identified by the Council, its advisory bodies, the public, and NMFS during the review process as well as covering the topics outlined in NOAA Fisheries catch share review guidance.

Program reviews also require Council and stakeholder time to review the program review work plan and the program review document. Completing both tasks will require approximately 3 hours of Council and Advisory Panel meeting time. In addition to the time each member spends at the meeting, substantial time is also spent reading the document and preparing for the meetings. The Council's SSC has implemented a new policy only to review program reviews if there has been a significant change to the program or the fishery since the most recent SSC review.

16.2.3 EA/RIR Development

Removing the RP sunset date reduces the time required to keep the program in place. A review of the program is still required every 7 years. If any changes to the program are identified during that review or through staff tasking at other meetings, implementing an FMP amendment or regulatory amendment will require drafting and reviewing an EA/RIR. That process often requires more than one review before Council approval. Each time the analysis is brought before the Council, it increases the overall cost in terms of time and available resources.

17 Observer Costs and Cost Recovery

17.1 Observer Costs

Before implementing the RPP, observer coverage rates varied with vessel size. In general, 125' LOA (or longer) vessels were required to have 100 percent observer coverage. Vessels less than 125' but 60' or greater LOA, were required to have 30 percent observer coverage. Vessels less than 60' had no observer requirement. All CVs participating in the RPP, regardless of LOA, were subject to 100 percent observer coverage when the RPP was implemented and CPs were required to have 200 percent coverage. That level of coverage and associated observer costs have continued under the RP.[51] The vessel operator must provide a computer for the observer to use for electronic data entry. The RP-specific CV observer coverage requirements begin on April 1 and end on November 15 or upon checking out of their rockfish cooperative.

NMFS may grant waivers for observer coverage. The number of waivers during 2022 was comparable to other years not impacted by the COVID-19 pandemic, which ranged between 5 and 13 for 2016 through 2019. Of the waivers granted in 2022, a third were so the observer provider could prioritize monitoring full coverage trips, as requested by NMFS. NMFS requested this because only one full coverage observer provider covered the rockfish fisheries in the GOA that year (AFSC 2024).

Observers are also required on all vessels subject to RP sideboard limits that directed fish in the West Yakutat District, Central GOA, and Western GOA during July. Requiring vessels to have an observer aboard helps to ensure that vessels do not exceed the sideboard limits. The sideboard limits for the Western GOA and West Yakutat District rockfish fisheries are small relative to potential harvest rates and must be closely monitored to avoid exceeding sideboard limits. Halibut PSC limits in the deep-water and shallow-water fishery complex are also managed based on data gathered by observers.

Confidentiality restrictions prohibit directly comparing costs over various periods. There is currently only one primary observer provider that deploys observers into the RP. A second provider has always covered some trips because it is a difficult fishery for one provider to cover all the trips.

The business information that NMFS holds is classified as confidential, precluding NOAA Fisheries from releasing any cost or invoice information. As a proxy for the observer providers' daily rate, the average of all full coverage providers is presented based on the North Pacific Observer Program 2023 annual report. The average "fully-loaded" cost per day of observer coverage in the full coverage category in 2023 was $404, up 2.3 percent from 2022 when it was $395 and 6.0 percent higher than the time-series mean of $381. This 'fully-loaded' average combines invoiced amounts for the daily rate per observer day ("daily cost") plus all other costs for transportation and other expenses ("incidental costs") (AFSC 2024). The current cost cannot be verified, but has been verbally communicated by fishermen to be up to $800/day. This is about double the cost reported for 2023.

Observer costs and improved discard estimates are reasons the industry is working to help develop Rockfish EM. Covering rockfish is not only expensive for vessels, but it is also expensive for the providers. Some boats have enough quota to fish consistently for a month, but the majority of the fleet only has enough quota for a few trips that they may take sporadically in May and finish up in the Fall. Providing observer coverage for a fishery with many down days and sporadic fishing increases costs. Observer providers will often fly observers out of Kodiak rather than having them sit in town with no work. When a vessel needs an observer, it may take up to two weeks for a new observer to be assigned.

[51] See § 679.51(a)(2)(i)

Shoreside and floating processors that process more than 1,000 mt of groundfish in a calendar month were required to maintain 100 percent coverage to observe landings. Shoreside and floating processors that process less than 1,000 mt and more than 500 mt of groundfish in a calendar month are required to maintain 30 percent observer coverage.

17.2 Plant Modifications

Processors that provided information on plant modifications related to accommodating observer coverage requirements indicated that any changes were made for their purposes. It does not appear that processing plant operators incurred costs directly attributable to the RPP or RP for changing the structure of their processing facilities.

17.3 Cost Recovery

The cost recovery fee was not part of the RPP (2007-2011) but was implemented in 2012 in conjunction with the RP as required under Section 303A of the MSA. Cost recovery fees are assessed on the ex-vessel value of primary and secondary rockfish species CQ harvested by RP cooperatives. Cost recovery fees do not apply to prohibited species catch CQ (since those species may not be sold), secondary species managed under an MRA (because CQ is not issued), or any other species for which CQ was not issued but are taken incidentally to species allocated under the RP. The cost recovery fees do not apply to RP entry-level longline fishery and opt-out vessels because those participants do not receive rockfish CQ and, as a result, are not fishing under a LAPP subject to cost recovery.

The person holding RP CQ is responsible for the cost recovery fee. Processors receiving and purchasing landings of primary and secondary species RP CQ must submit a complete Rockfish Ex-vessel Volume and Value Report to NMFS. This report covers landings from April 1 through November 15[52] and must be received by NMFS by December 1. All processors have complied with this annual requirement under the RPP and RP.

NMFS determines recoverable costs for the various agency departments that incur recoverable costs. Those units include NMFS Restricted Access Management (RAM), NMFS Information Services Division, NMFS OLE, NMFS SF, NMFS Operations and Management Division, NMFS AFSC, NMFS Regional Administrator Office, and ADF&G.

The 2023 fee liability was 3.0 percent. Overall, direct program costs for FY 2023 were the most since 2015. The cost recovery fee percentages were set at 3 percent for 5 of 11 years from 2012 and 2023.

Table 17-1 Recoverable cost estimates for fiscal years 2012 through 2023

Year	Pounds landed	Fishery Value	Total Program	Calculated Fee Percentage	Actual Fee Percentage
2023	62,800,110	$9,597,377	$344,120	3.59%	3.00%t [a]
2022	61,695,411	$12,187,846	$308,955	2.53%t	2.53%
2021	65,301,975	$ 10,308,123	$285,252	2.77%	2.77%
2020	53,839,320	$ 7,658,264	$ 280,222	3.66%	3.00% [a]
2019	46,685,583	$ 10,383,136	$ 319,324	3.08%	3.00% [a]
2018	47,261,765	$ 11,231,239	$ 321,411	2.86%	2.86%
2017 [b]	40,587,961	$ 10,248,424	$ 208,666	2.04%	2.04%

[52] It was May 1 before changing the season start date.

2016	49,777,303	$ 12,009,975	$ 304,684	2.54%	2.54%
2015	45,152,020	$ 11,117,262	$ 361,790	3.3%	3.0% [a]
corrected 2014[c]	44,016,252	$ 10,505,776	$ 345,948	3.3%	3.0% [a]
2014[c]	25,618,470	$ 6,265,656	$ 345,948	5.5%	3.0% [a]
2013	36,222,525	$ 8,716,340	$ 224,059	2.5%	2.5%
2012	40,963,090	$ 14,340,362	$ 194,562	1.4%	1.4%

[a] These billed percentages were limited by the MSA statutory 3 percent cap
[b] The lower costs and fee percentage for the 2017 fishing year are due in part to an accounting error which resulted in underreporting of NMFS's RP costs in FY 2017.
[c] The pounds landed and fishery value for 2014 as reported in the **Federal Register** notice (80 FR 6053; February 4, 2015), however, NMFS subsequently determined that the landings and value from the CP sector were incorrectly excluded for 2014. However, the fee percentage remained at the 3 percent cap.

Direct program costs (the annual cost recovery fee) for FY 2023 was $344,120 and is broken down by management agency. Costs in FY 2023 are primarily attributed to NMFS AKR personnel for catch accounting, inspections, permit issuance, and fisheries management. Personnel costs were similar to FY 2022. However, there was an increase in travel costs. There was also a significant contract cost increase due to ongoing upgrades to eFish and supporting systems. The AFSC and ADF&G had slightly higher costs for FY 2023 compared to FY 2022. However, both the AFSC and ADF&G make up a small percentage of the total direct program costs for rockfish cost recovery (NOAA Fisheries, 2023).

Table 17-2 Recoverable costs by department for 2023.

Cost Recovery Component	*NMFS AKR*	*NMFS AFSC*	*ADF&G*	*Total*
Personnel Costs[a]	$188,484	$4,745	$6,268	$199,497
Travel[b]	$6,854	$38	-	$6,892
Transportation[c]	$4,364	-	-	$4,364
Printing	-	$500	-	$500
Contracts/Training	$120,143	$2,863	-	$123,006
Supplies	$3,691	$317	-	$4,027
Equipment	-	$85	-	$85
Rent/Utilities[d]	$5,741	-	-	$5,741
Other[e]	$7	-	-	$7
Total	**$329,284**	**$8,549**	**$6,268**	**$344,120**

[a] Personnel includes costs of locality pay, benefits, and overhead.
[b] Travel includes per diem payments.
[c] Transportation includes shipment of items.
[d] Rent/Utilities includes space costs, utilities, and common space and services.
[e] Other includes costs for grant staff supporting RP cost recovery

Source: NOAA Fisheries 2023 RP annual cost recovery report.

18 Summary and Conclusions

This Summary and Conclusions section uses information presented in the previous sections to briefly describe the overall impacts of the RP on various components of the fishing industry, communities substantially engaged in or dependent on the fishery, and the Nation. Subsections are also provided that describe various regulations that the Council could consider revising as part of the program review process and data that may have been useful for the review but was unavailable to the analysts.

In general, the RP appears to be functioning as intended. It has provided benefits for all sectors to varying degrees and, based on information available, the program appears to have increased net benefits to the Nation. Because the fishery structure is functioning as intended, most participants in the CV, CP, and shoreside processing sectors are not recommending substantial changes to the program. However, the shifts in market power between the pre-RPP, RPP, and RP periods attributable to cooperative structures remains an area of contention among some stakeholders.

18.1 Harvesters

The secure harvest privileges granted to harvesters provide the opportunity to employ better fishing and fish handling methods to reduce bycatch and habitat impacts. At the same time, those practices can increase the quality of products produced, increase the value of the products, increase ex-vessel prices paid to harvesters, and increase net benefits to the Nation.

During the pre-RPP era, harvesters in the Central GOA trawl rockfish fishery were required to hold a valid GOA LLP license with a Central GOA trawl gear endorsement to participate in the directed rockfish fishery. Harvesters would compete with other LLP license holders to catch a portion of the Central GOA rockfish species TACs during July before the fisheries were closed. The race-for-fish conditions inherent in that system typically meant the fisheries would last three weeks or less.

Under the RPP, trawl vessels needed to have Central GOA rockfish QS assigned to their LLP license to fish in a cooperative or hold an LLP license with a Central GOA trawl endorsement and fish in the entry-level fishery. Trawl vessels participating in the RP must have rockfish QS assigned to their LLP license and fish in a cooperative. The RPP trawl entry-level fishery was eliminated under the RP.

The RPP and the RP have extended the duration of the Central GOA Trawl Rockfish fishery from about three weeks to potentially more than six months (April 1-November 15) for the fishermen who are members of a rockfish cooperative. Most of the fishery under the RP has occurred in May and June. Recent changes in the fishery and the program have altered when fishing is likely to take place. Fishing is more likely to start in April, which was made possible because of Amendment 113 changing the season start date, allowing fishery participants to fill downtime caused by less flatfish fishing opportunities after the A-seasons for pollock and Pacific cod close. The RP fishery has also closed earlier in recent years because processors have stopped taking deliveries before November to allow for plant maintenance and to reduce labor costs. Moving the bulk of the rockfish fishing from July has reduced conflicts with the pink salmon fishery, which was a primary reason for the implementation of the RPP.

The RPP and RP helped increase the ex-vessel value of CV landings. From 2006 to 2016, the real ex-vessel value of Pacific ocean perch increased by 247 percent. Much of the increase was due to the increased landings since the real ex-vessel price only increased about 6 percent. Dusky rockfish real ex-vessel value increased by about 100 percent over the same period, despite the real ex-vessel price declined slightly. Northern rockfish real ex-vessel value was the same in 2006 and 2016. While the real ex-vessel price did not show dramatic increases over the 2006 through 2016 period, market forces were exerting downward pressure on first wholesale prices, so the price increases may have been less (or the decreases greater) without the LAPP management structure. That trend has not continued in recent years,

especially after 2019. Using Pacific ocean perch as an example, real ex-vessel prices are reported to have declined from $0.23/lb. in 2019 to $0.13/lb. in 2023 (Table 7-1). So, the 2023 real ex-vessel price is only 57 percent of the 2023 real ex-vessel price. The gross ex-vessel value also declined but increased Pacific ocean perch harvests tempered the decline. Costs have also increased, but data are unavailable to quantitatively estimate the total cost increase.

CQ allocations of sablefish allow harvesters to take directed sablefish trips instead of less efficient trips where sablefish was taken under an MRA and vessel operators would "top-off" on sablefish as part of directed rockfish trips. Allowing harvesters to make directed fishing trips for sablefish has allowed harvesters to take shorter trips and deliver a higher-quality product. However, recent declines in sablefish value and smaller sablefish being caught have reduced the value RP participants have generated by harvesting their sablefish CQ allocations. Table 7-1 indicates that the average real gross ex-vessel price of sablefish in 2017 was over $4.00/lb. The 2023 real ex-vessel price was reported to be $0.80/lb. or about 20 percent of the 2017 price.

The CV sector has harvested most of its allocation with few overages. Transfers of quota from CP cooperatives to CV cooperatives were substantial under the RPP because of the specific nature of the cooperatives that formed. Most of those transfers were between cooperatives with the same parent processing company and resulted in increased amounts of rockfish species delivered to shoreside processors. When the RP was implemented, changes in the qualifying years resulted in those delivery patterns being entrenched in the sector allocations and resulted in the CV sector being allocated 2.18 percent less of the Central GOA TAC for Northern rockfish, and 10.35 percent more of the Pacific ocean perch TAC and 16.27 percent more of the dusky rockfish (previously classified as pelagic shelf rockfish) TAC than under the RPP. The CP sector realized percentage changes in the TACs of the same magnitude but opposite signs.

An important beneficial effect of the RPP and the RP is the substantial reduction in discards in the Central Gulf rockfish fisheries. From 2003 through 2006, discards of Pacific ocean perch regularly exceeded 5 percent of total catch of the species. Discards of sablefish exceeded 100 mt in some years and exceeded 250 mt in one year. Under the RPP and RP, at-sea discards of CQ species are generally not permitted by cooperatives, reducing discards to near zero. Any discards that do occur are required to be noted in the annual cooperative report. Typically, these discards result when a cod-end is too big to bring safely aboard the vessel. Any discards that do occur, including those done for the safety of the vessel or crew, are deducted from the cooperative accounts by NMFS and the vessel's account by the cooperative.

Halibut PSC mortality dropped sharply under the RPP and RP, most notably in the CV sector. Annual halibut mortality rates dropped from between 1.5 kg/mt to 3.0 kg/mt of groundfish basis species during 2003 through 2006 period, to 0.1 kg/mt to 0.3 kg/mt during each year of the RPP and RP. These numbers indicate that in most years the halibut mortality rate in the RPP and RP is about 10 percent of the rate realized in the four years prior to the RPP. In the CP sector, the halibut mortality rates were 0.6 kg/mt to 1.0 kg/mt in the 2003 through 2006 period, to 0.3 kg/mt to 0.6 kg/mt of groundfish basis species during the RPP and RP. In other words, CP halibut mortality rates in the RPP and RP were about half the rate realized in the four years prior to the RPP. These rates indicate that both the RPP and RP were successful in reducing halibut mortality rates in both the CV and CP sectors in the Central GOA rockfish fisheries.

Chinook salmon PSC usage in the rockfish fishery did not realize the same magnitude of decline reported for mortality reductions of halibut PSC. Chinook salmon bycatch rates were highest in 2008 and 2015, but very low in 2016. The variability of the Chinook salmon PSC rates highlights the difficulties associated with avoiding Chinook salmon, even when the gear is modified to allow some salmon to escape and the fleet communicates bycatch hot spots in close to real-time. The reported rates are also

influenced by the basket sampling methods that are employed to estimate total bycatch for the vessel, or prior to 100 percent observer coverage in the rockfish CV fleet, similarly situated vessels.[53]

In addition to the conservation benefits from these discard and mortality reductions, the use of more pelagic gear in the fishery has provided habitat benefits. Annual rockfish allocations increased the opportunity to develop and implement gear modifications that reduced contact with the sea floor. Use of semi-pelagic bottom trawl gear (doors off bottom) beginning around 2008 (under the RPP) decreased the bottom contact from the heaviest portion of the gear. In 2014, mandatory sweep modifications for flatfish trawls were implemented that raise most of the trawl off the bottom have been used in other fisheries as well, as sweeps are difficult to replace for specific other target trips. These gear innovations are reported by members of the fishing industry to have spread to other areas of the US and the world.

Cooperative members have also collaborated to improve fishing practices. For example, they have developed voluntarily inter-cooperative agreements focused on coordinating quota management, setting up reserves to cover overages, and implemented incentives to avoid halibut. The halibut bycatch measures include setting maximum halibut bycatch rates and imposing restrictions on members with halibut bycatch rates over the limit. These types of measures have, in part, helped to reduce halibut PSC mortality in the Central GOA rockfish fishery.

The attachment of catch history to the LLP license and making it non-severable has limited consolidation since QS cannot be stacked on fewer LLP licenses. The non-severability of quota from a license also means that a person would need to sell the entire LLP license to sell the quota. Selling the LLP license would result in a vessel operator giving up all the other endorsements associated with the LLP license. The vessel operator would need to have access to another LLP license with the appropriate endorsements to continue fishing the GOA/BSAI with trawl gear.

Ownership and use caps have been effective in limiting vessel consolidation. Fleet consolidation has not occurred at a substantial rate under the RPP or the RP. About the same number of CVs (approximately 25 each year) and CPs (approximately six) fished in the Central GOA rockfish fisheries before the RPP was implemented through 2020. In more recent years, the number of CVs decreased reaching 18 in 2024. Four CPs have operated in the fishery in recent years. Reductions in participation recent years appear to be related to changes in the economics of the fishery (and Alaska fisheries overall) and not the design of the RP.

Vessel safety is discussed in Section 14. NIOSH staff determined that there were no work-related crewmember fatalities or vessel disasters among vessels when actively participating in the Central GOA rockfish fishery during the pre-RPP, RPP, or RP years included in this analysis. The good record of safety of human life at sea was attributed to the extended fishing season that have reduced race-for-fish behaviors and allowed captains to choose when to operate in the event of inclement weather or crewmember fatigue. Maintaining vessel safety achieved under the RPP was a Council stated goal of the RP.

18.2 Shoreside Processors

Kodiak processors are heterogeneous in both their business models and physical plants. Because of this variation, the RPP and RP have had different impacts on different processing companies. All shoreside processors that qualified for the RPP benefited from the cooperative associations that helped facilitate their coordination of deliveries, relative to the pre-RPP's LLP management structure. Processors that were not part of a rockfish cooperative could only take deliveries from vessels that fished in the entry-

[53] Vessels fishing the same general areas and times that did not have observer coverage.

level trawl[54] fisheries or possibly limited deliveries of CQ with the agreement of all parties to the cooperative contract. These processors were in a limited-entry fishery and could not coordinate deliveries. The entry-level trawl CVs were racing to harvest the sector's allocation (2.5 percent of the TAC) before it was taken or halibut PSC limits were reached and fisheries dependent on the deep-water halibut complex were closed to directed fishing.

Shoreside processors that qualified for the RP continued to benefit from the cooperative associations that facilitated the coordination of deliveries. This coordination maintained the longer fishing seasons. Longer fishing seasons have allowed higher-quality fish to be delivered to processors who can, in turn, produce higher-quality products.

All shoreside processors involved in the RP indicated that there have been improvements in product quality. The most notable increase in product quality occurred between the pre-RPP years and the RPP. Implementing the RPP increased product quality immediately since fish were delivered in better condition and processors were able to coordinate deliveries to reduce the time between when the vessel arrived and when the fish was processed. Since the RPP was put in place, processors have maintained product quality improvements and continued the trend of producing better quality products. After the RPP was implemented, improvements have been more gradual and have been attributed to better handling of the fish and better equipment and technology (refrigeration systems, etc.) on the CVs. The improvements in technology and equipment have benefitted all fisheries and not just those taken under the RP.

The agreements between processors and harvesting cooperatives have stabilized deliveries over a longer period in most years; processing plants now receive deliveries during months that have historically been slow, keeping plants active (or more active) when they would normally have closed or operated with smaller processing crews. The recent regulatory change that moved the fishery start date to April 1 is also expected to allow processors to reduce downtime caused by fewer flatfish fishing opportunities between the end of pollock/Pacific cod A seasons and the start of the RP fisheries. The seasonal flexibility also reduced conflicts between the timing of deliveries of salmon and rockfish during July. Moving most of the Central GOA rockfish harvests to April through June should allow both harvesters and processors to fill slower fishing times. In doing so, it has provided more work opportunities for the local Kodiak labor force, which traditionally may have had to depend on unemployment compensation when locally operating shoreside processors slowed or suspended production.

One significant program change when the RP was developed was the elimination of the linkage between harvesters and the processor to whom they historically delivered a majority of their catch feature of the RPP. NOAA General Council determined that the Council and NOAA Fisheries did not have the authority to impose those linkages and that were only allowed under the RPP because of explicit Congressional authorization. Removing the requirement that harvesters join the cooperative with the processor where they delivered most of their catch during certain years changed the market power between the two sectors, but it is not possible to quantify the magnitude of the change. Processors were granted relatively more market power under the RPP compared to either the limited access fishery or the RP because of the linkage of harvesters to processors based on historical landings. Information is not available to calculate rents in the various sectors.

Section 7 provides a summary of the change in the ratio of ex-vessel to first whole prices. While this indicates market power, many factors are not accounted for in that simple ratio, including costs and profitability. So, while the information is pertinent, it is not intended to be considered a proxy for the division of rents between the sectors. Data provided in that section indicates that harvesters were generally paid a lower percentage of the first wholesale value during the RPP, relative to the Pre-RPP years and the RP years included in the analysis. The analysis does not attempt to determine an optimal division of the first wholesale price between harvesters and processors to maximize net benefits to the

[54] Only processors that were not cooperative members could take deliveries from entry-level fishermen.

Nation. The information to make that calculation is not available and, even if it could be made, it would not account for policy and social objectives that are outside of a purely economic solution.

Processors are not able to pass on increases in ex-vessel prices to the buyers of their products. First wholesale price is determined by the world market for these species and the Central GOA rockfish fishery is a small component of the worldwide supply. As a result, the RP has little impact on changes in rockfish first wholesale prices and overall supply.

The redistribution of rockfish deliveries away from peak July salmon processing activity has increased operational efficiency at processing plants. This has been done lowering peak labor demand, decreasing times of the year when plants are idle or have a minimal level of activity, and helping to retain processing crew with steadier employment for more of the year, among other factors.

Monitoring has changed at the plants that take deliveries of CQ under the time periods considered. Before implementation of the RPP, shoreside and floating processors that processed in excess of 1,000 mt of groundfish in a calendar month were required to maintain 100 percent coverage to observe landings; those that processed less than 1,000 mt and more than 500 mt of groundfish in a calendar month were required to maintain 30 percent observer coverage (North Pacific Fishery Management Council, 2006). Processors that took trawl deliveries were generally in the 100 percent coverage category. Under the RPP, processors that took delivery of CQ were required to have 200 percent coverage. The additional coverage was needed to account for monitoring individual cooperative allocations. However, the additional coverage was increased costs and some plants adjusted delivery patterns to reduce the hours deliveries occurred and the need to have observers in the plant 24 hours a day. The introduction of the CMCP in the RP eliminated the 200 percent observer coverage requirement and reduced costs. Processor representatives contacted for this analysis have indicated that the CMCP specialist approach to monitoring has generally worked well.

Processors must notify NMFS at least three hours ahead of when a delivery will occur. This is necessary to ensure the offloads can be monitored. Processing company staff members have indicated that their workers understand the rule and it has not been a problem. Some processors noted that it was less burdensome than the halibut IFQ landings notification requirement.

Processors have been unable to develop significant new products or fresh markets for rockfish harvested by either the trawl fishery or the entry-level longline fishery. The first wholesale price of those value-added rockfish products has, to date, been too low to be profitable. Processors indicated that while they continue to explore potential new markets, relatively high labor and shipping costs to produce those products have been a primary impediment to success in this endeavor.

Processing use caps are considered to be effective by stakeholders contacted for this analysis. Use caps limit competition for deliveries to processors when one or more plants reach their cap. Limitations prohibit plants at the cap from expanding their rockfish operations and could potentially reduce technical efficiency by preventing a plant from operating at optimal capacity. Because processors are not issued an allocation of processing quota, they must either provide incentives for a vessel to change markets or purchase a competing processing facility and retain the vessels. Buying a competitor, as opposed to just quota, is much more capital intensive and encompasses more than just the rockfish fishery, since the plants are often also involved in other groundfish, halibut, salmon, herring, and/or shellfish processing. It is unlikely that a firm would acquire another plant for the sole purpose of additional access to the rockfish fishery. Additional information on processor consolidation is presented in Section 13.4.1.2.

Another benefit of the RP was that it helped provide a structure that has encouraged the fleet/processors to participate in collecting data from Chinook salmon to understand stock composition. This data collection was voluntarily undertaken at the industry's expense and provided information to determine the stream origin of each Chinook salmon taken as incidental catch in the RP. This project added costs and collection time for both harvesters and processors. Stakeholders initially felt that the benefits outweighed

the costs. At the time of the COVID-19 pandemic, this program was discontinued because of the other research priorities and the Alaska Groundfish Databank staff's capacity to oversee the program. Stakeholders have also expressed concern over the limited use of the data collected.

Finally, processors must collect and submit the cost recovery fee for the RP. Cost recovery was not part of the RPP. This requirement has slightly increased costs and the reporting burden for processors. These costs were greatest when the program was first implemented since it required the firms to set up a system to determine, collect, and submit the fees.

18.3 Fishing Communities

Among communities substantially engaged in, and/or substantially dependent on the Central GOA rockfish fisheries managed under the RP, Kodiak is the most engaged in and most dependent on the fishery as measured by multiple indices. Kodiak has experienced beneficial impacts across harvester, processor, and support services sectors because of the implementation of the RP and has specifically benefitted from several community protection measures built into the program. Although not all individual operations have benefitted equally from the change in qualifying years between the RPP and the RP and therefore changes in the pattern of initial quota share allocations under the two programs, no substantial adverse sector-level or community-level impacts resulting from the implementation of the RP have been identified for the community of Kodiak.

During the RP years, as measured by ownership address information, Kodiak has experienced progressive increases over the pre-RPP, RPP, RP 2012-2018, and RP 2019-2024 eras in annual average participation of local CVs; local ownership of relevant LLP licenses; and local ownership of CV quota shares for Northern rockfish, Pacific ocean perch, and pelagic shelf/dusky rockfish, despite seeing a downward trend in the number of local CVs participating in the fishery within the 2019-2024 era. All three CVs that qualified for an initial allocation of quota under the RP based on their participation in the entry-level trawl fishery were either Kodiak resident-owned at the time of that allocation or have become so in more recent years.

It is assumed that the number of crew positions and potentially payments to crew have similarly varied during this time. However, publicly available quantitative data do not currently exist to verify this assumption or, if the assumption is correct, quantify these changes. The impacts of quota leasing costs or program-associated vessel operating costs (such as cost recovery fees and co-op fees), if any, on crew compensation is unknown, as are the impacts on crew employment, if any, of the increased number of Central GOA rockfish trawl fishing days per season. Similarly, the impacts of the reduction of vessel operating costs that may have been achieved because of changed fishing conditions under the RP (such as owner-reported reductions in fuel consumption and gear repair costs), if any, on crew compensation are unknown.

Kodiak has experienced considerable consolidation of ownership of shoreside processors that regularly accepted trawl-caught deliveries of Central GOA rockfish during the RP years. However, this consolidation is attributed to factors external to the RP. while the transition from the RPP to the RP was generally beneficial for Kodiak shoreside processing plants, specific outcomes varied between processors operating in the community due to different processing histories accrued during the different sets of qualifying years used for initial allocations under the two programs.

No systematically collected data on Kodiak fishery support service businesses in general or those linked to the Central GOA rockfish fishery specifically are available. However, the number of locally owned rockfish trawl vessels increased, Kodiak became the exclusive port of landings for all trawl-caught rockfish CV landings, the number of processors affiliated with rockfish cooperatives increased, and gross revenues accruing to both harvesting and processing sectors increased under the RP. These increases have likely been accompanied by increased local spending by vessel owners, vessel crews, and processing workers, significant numbers of whom are Kodiak residents, but the level of impact on the local purchase of goods

and services is unknown. The percentage of Central GOA rockfish fishery landings related-revenues subject to taxes that directly benefit the City of Kodiak (and the Kodiak Island Borough) remain modest compared to several other fisheries. However, the percentage attributable to the rockfish fishery has increased under the RP compared to other years. Further, the community protection feature of the RP that ensures Central GOA rockfish trawl CV landings will occur in Kodiak also builds an additional measure of stability into the public revenue stream compared to previous conditions.

The greater Seattle area (as represented by the Seattle MSA) was substantially engaged in the Central GOA rockfish trawl fishery in several ways over the period 2017-2024. While changes have occurred in several sectors, no community-level impacts resulting from the implementation of the RP have been identified. Similarly, Newport and Lincoln County, Oregon, were identified as substantially engaged in the Central GOA rockfish trawl fishery through CV ownership, and while changes have occurred during the RP years, no community-level impacts resulting from the implementation of the RP have been identified.

No issues identified with the RP have put the sustained participation of any communities substantially engaged in or substantially dependent upon the Central GOA rockfish fisheries at risk.

18.4 Entry-level Fisheries

The trawl entry-level trawl fishery was eliminated when the RP was implemented. For additional information see the 2017 RP Review (link provided in Table 2-1).

The longline entry-level fishery caught little of its allocation under the RPP and has not been utilized at close to the harvest limits in recent years. The RP entry-level longline fishery has been exclusively used by jig gear vessels to date. The set aside of primary rockfish species allowed vessels using jig gear to expand their primary rockfish species harvest in the Central GOA in past years. The 20 mt increase in the dusky rockfish allocation in 2017 has allowed for some growth in that fishery but is less than the reported 2016 harvest. The fleet has not utilized close to its allocation of any of the three primary RP species in more recent years.

Participants in the RP entry-level longline fishery may deliver their harvest to any shoreside processing facility in any community in the GOA. This change in the delivery requirements in the RP has eliminated some of the logistical issues faced by harvesters that had markets for species with a processor in a RPP cooperative, but were prohibited from delivering certain rockfish species catch to that processor.

Overall, the entry-level fishery provides an opportunity for longline gear vessels to develop markets for rockfish and harvest rockfish in both the State and Federal waters of the Central GOA. The current limits in the fishery provide room for increased harvest. The benefits of the entry-level fishery are expected to be greatest when lower diesel prices make the fishery more economically viable and rockfish prices increase to a level that allows the fleet to cover fishing costs.

18.5 Regulations

Modifying regulations falls outside the scope of this program review. However, NMFS has noted that it is currently working with industry to test the viability of using EM to monitor at-sea retention and discards. Should EM be approved for monitoring the RP fishery, it would require implementing regulations. Recent changes requiring the removal of 10 regulations for each new regulation will require NMFS to determine which regulations can be removed.

18.6 Net Benefits to the Nation

NOAA Fisheries policy guidance state that a program "review should contain an assessment of the program's effects on net benefits to the Nation, keeping in mind that net benefits are not exclusively economic in nature" (NOAA Fisheries, 2017). This report does not attempt to provide a quantitative estimate of changes in net benefits to the Nation, since the data to make those estimates are unavailable. Instead, a qualitative discussion of factors that change net benefits to the Nation is provided.

Factors that affect net benefits to the Nation include slowing the rate of fishing and extending the season, which leads to increases in product quality. These benefits are not assured if small and sporadic deliveries over an extended season impede economic efficiency owing to a loss of economies of scale for processors. However, the flexibility and the incentives for harvesters and processors to work together mean it is possible to avoid these undesirable impacts, where those incentives did not exist under race-for-fish conditions.

Participants in both the harvesting and processing sectors work together to improve the quality of fish delivered and processed, resulting in higher value products than would have resulted under race-for-fish conditions. Some production benefit could flow to foreign-owned processing entities, but since increases in processor net benefits are expected to be relatively minor under the RP, almost all the gain in production efficiency should be realized by U.S. entities and citizens.

Production improvements should lead to benefits for U.S. consumers. Processors continue to try to develop profitable U.S. markets where consumers can purchase fillets. Development and expansion of these markets have been slow because of the relatively high processing costs to make and ship fillets and the relatively low price those products command in the market. Development of markets that reduce the amount of whole and head and gut products shipped abroad for reprocessing would increase net benefits to the nation.

Increased administration and oversight, necessary for cooperative allocations, and an extended season have resulted in an increase in costs of management, monitoring, and enforcement. To the extent these costs are taxes paid by the fleet through cost recovery they have no impact on net benefits to the Nation. The increase in value derived from the fishery in technical efficiency gains in the harvesting and processing sectors are anticipated to more than offset those costs.

CVs fishing in cooperatives have dramatically reduced their halibut PSC mortality rates under both the RPP and RP relative to the pre-RPP years. Those halibut PSC allowances can then be used to support a longer GOA flatfish fishery and potentially a late season Pacific cod fishery when the halibut PSC limit for the deep and shallow water complexes are combined. These halibut PSC reductions have arisen through the use of pelagic gear and semi-pelagic gear, which has reduced the amount of bottom contact by trawl gear in the fishery, creating benefits through less damage to habitat on the sea floor. The slowing of the pace of the fishery through the cooperative allocations has made it more practicable for harvesters to implement and fine tune these gear modifications. The knowledge gained under the RPP and RP has been used to introduce similar gear modifications to other GOA, BSAI, and West Coast trawl fisheries, which has also increased net benefits to the Nation.

Reductions in the Chinook salmon bycatch rates have also been realized. Any savings in Chinook salmon will benefit other non-pollock trawl fisheries in the GOA, if they are needed to keep fisheries open. If those fish are not taken in the GOA trawl fisheries, they will benefit participants in the directed Chinook salmon fishery and/or the Chinook salmon resource.

Changes in directed fishing patterns have also provided benefits under the RPP and RP. Trawl CVs targeting sablefish on separate trips has improved quality of trawl sablefish landings, reduced costs associated travel and with keeping those higher value species separated from rockfish, and improved prices.

The RPP and RP have resulted in the redistribution of rockfish landings over a substantially longer period. The redistribution has allowed processors to avoid conflicts with other fisheries, most importantly salmon fisheries that peak during the month of July. This rescheduling has decreased the time vessels wait in queue to offload their catch and allows processors to provide more consistent employment for their crews.

Shoreside processors have also benefited from changes in the plant observer requirements. Moving from the limited entry fishery to the RPP increased costs associated with the moving from approximately 100 percent coverage to 200 percent coverage. When the RP was introduced, it eliminated the 200 percent plant coverage requirement and replaced it with the CMCP specialist requirement. This change has been effective in monitoring the rockfish deliveries and has reduced costs to the shoreside processing sector.

Finally, elimination of the race-for-fish conditions improves safety at sea. CQ allocations reduce the incentive for fisheries participants to take risks to maintain their share of the fisheries, including fishing when weather conditions are poor or crew are fatigued.

18.7 Fishery Allocation Review

Allocation of fishery resources is a complex issue facing fishery managers and the needs for participants in the fishery are not static. However, based on the information presented by stakeholders, information presented in the RP Review, and discussion with fishery managers, no evidence has been presented that suggests revisiting the RP allocations is needed. Substantial concerns have, however, been expressed regarding the overall economic health of the harvesters, processors, support industries, and communities that are most reliant on these trawl fisheries due to conditions external to the RP.

18.8 Unavailable Information

Certain data and information that was unavailable would have been useful if it could have been included as part of this review. The analysts do not advocate implementing data collection programs to collect all the unavailable data. A discussion of the information that is unavailable, its potential uses, and issues associated with collecting the data are presented the following table.

Table 18-1 Information that was unavailable when conducting Central GOA RP review

Review Information	Potential Uses	Issues
Rockfish QS and CQ market values	QS value can provide a measure of the expected stream of long-term discounted rents from holding the asset. CQ leasing may provide information on the annual value.	It has been difficult to collect sufficient useful arm's length value information on QS sales and CQ leases in other LAPPs (Holland, 2015).
Time series data on crew employment	Determine impacts to crew and communities from changes in regulatory structures.	Crew and community information previously being collected through the GOA trawl EDR is no longer being collected. Only 7 years of data (2015-2021) are currently available. It will not be

Review Information	Potential Uses	Issues
		possible to collect additional historical data.
Fishery-specific time series data on CV crew compensation	Determine impacts to CV crew compensation from changes in regulatory structures.	The impacts of quota leasing costs or program-associated vessel operating costs (such as cost recovery fees and co-op fees) on crew compensation is unknown, as are the impacts on crew employment of the increased number of Central GOA rockfish trawl fishing days per season. Similarly, the impacts of the reduction of vessel operating costs that may have been achieved due to changed fishing conditions under the RP (such as owner-reported reductions in fuel consumption and gear repair costs) on crew compensation are unknown. These data could be collected from CV owners or CV cooperatives, but it would not be possible to collect historical data.
Fishery-specific time series data on processor crew compensation	Determine impacts to shoreside processor crew compensation from changes in regulatory structures.	Information on total processor crew compensation by month previously collected through the GOA trawl EDR is no longer being collected. Only 7 years of data (2015-2021) are available. Additionally, the EDR data that were collected are not fishery-specific, nor were changes in overtime compensation reported. It is not known whether processors could provide fishery-specific data due to the integrated nature of processing operations. It will not be possible to collect additional historical data.
Analysis of Central GOA rockfish longline CV participation	Determine why all longline participation ceased in 2009 or earlier in entry-level fishery with the exception of vessels	It is not possible to determine the cause of the decline in participation of Alaska communities other than Kodiak with existing data. Additional

Review Information	Potential Uses	Issues
	with Kodiak ownership addresses.	focused research would help establish the role of the RPP or the RP, if any, in the decline of fishery participation by these vessels.
Expenditures by harvesters and processors by location for vendors, suppliers, and support service businesses.	Determine economic impacts of purchases of goods and services by the fleets and processors in specific communities	This information could be collected from harvesters. It is difficult to assign purchases to specific fisheries and specific locations where purchases are made, but this information is important for understanding the local multiplier effect of fishery management changes. Collecting this information from vendors is problematic because of the recordkeeping that would be required.
Additional Chinook salmon biological samples from fish taken as bycatch in the rockfish fishery	Currently biological samples are not collected to determine whether fish are hatchery stocks or wild stocks.	Information would be relatively easy to collect and does not appear to be controversial with the fleet or processors.
Observer costs	Better understanding the economic impacts of changing observer coverage levels on the fleet	NMFS has the information but it cannot be released because it is classified as confidential. This information will not be available as long as there are fewer than three observer provider companies or unless confidentiality wavers are signed.
Vessel cost data	CV cost data are unavailable. If they were available they could be used to determine changes in profitability of firms.	These data were considered for inclusion as part of the GOA trawl CV EDR (that has been discontinued) but it was determined that the cost of collecting those data outweighed the expected value that could be derived from their collection.
Shoreplant cost data	Cost data in association with value data currently collected could provide information on changes in profitability of firms over time.	Neither the Council nor NMFS has the authority under the MSA to mandate collection of these data from shoreside processors. Any data collection would be done on a voluntary

Review Information	Potential Uses	Issues
		basis. If the data were collected, it would difficult to attribute costs to specific fisheries and would require several assumptions which may or may not hold.

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