

C-8 GOA Trawl Bycatch Management
Council motion 10/11/15

Motion language is in black/*rationale for the record is in red*

THE RATIONALE IS NOT A TRANSCRIPT OF WHAT WAS SAID ON THE RECORD

The Council approves the following alternative for inclusion in the Gulf of Alaska trawl bycatch management program analysis and revisions to the purpose and need statement. This alternative would apportion Chinook salmon and halibut prohibited species catch (PSC) limits to voluntary inshore trawl cooperatives, based on their member vessels. The analysis should evaluate: how well such a program may meet the Council's stated objectives; methods for distributing PSC to cooperatives; approaches for cooperative formation; consolidation controls; effects on processors, communities, and harvesters; and additional decision points necessary for implementation. The result is intended to further the Council's objective of advancing bycatch reduction and management and provide industry with additional tools to adapt to present and future management needs. The paper should also discuss whether such a program would be subject to the Limited Access Privilege Program provisions under Section 303A of the Magnuson-Stevens Act.

Last December the Council rescheduled review of this action, in recognition of a request from the State for additional time to review the current alternatives and determine whether any different approaches should be considered to reduce bycatch in the GOA trawl fisheries. The Council has previously approved alternatives for a GOA trawl bycatch reduction package that establishes cooperatives for some key trawl target species and bycatch species; those alternatives are not removed at this time. This motion is to add an alternative that is a variation on that approach and establishes bycatch cooperatives for the trawl catcher vessel sector with only halibut and Chinook salmon PSC apportioned to the cooperatives. This motion asks staff to specifically evaluate several proposed components of such a program, and weigh the approach against our current objectives, within the pending EIS for this action. The motion asks staff to expand on particular components, such as options for cooperative formation, options to distribute PSC to the cooperatives, and options to limit transferability of PSC, in order to limit consolidation.

Similar to the analytical approach for any alternative, we need to evaluate the costs and benefits of such a program, and determine whether this approach would result in the primary benefits of bycatch management we are looking for. These include vessel-level and cooperative-level incentives to avoid and reduce bycatch, and accountability measures for participants when utilizing PSC. This is not an IBQ program, where individual operators use, sell, and trade individual bycatch allocations, which, as with target species allocations, generates concerns about impacts to coastal AK as a result of a major shift of economic power. The intent is to establish bycatch cooperatives, whereby the cooperative structure could facilitate a coordinated effort among vessels to fish and avoid PSC, and take advantage of the planning, gear modifications, information sharing, and risk pooling possible under a cooperative structure.

The intent is also to look at an approach that is well contrasted with the current Alternative 2 and Alternative 3. One that still allows a secure privilege to an amount of bycatch that can be used by fishermen within a cooperative and allows for much greater flexibility in planning their operations around that privilege. But also one that attempts to mitigate some of the adverse impacts associated with allocating the primary target species, such as absentee ownership of quota, high leasing fees,

higher costs to access the fishery for new entrants, vessel and quota ownership consolidation, out-migration of fisheries-based wealth, impacts on other fisheries, and access for communities.

- This type of an approach was reviewed briefly in a discussion paper to the Council in June 2012, along with several other management options, but the paper focused primarily on why the Council didn't move such an alternative forward when it was debating the Chinook PSC cap in the Gulf pollock fishery (due to timing, and the need to develop a limited access opportunity). The paper was not focused on the merits of such an approach to meet bycatch objectives.

Harvesters, processors and community representatives have been very engaged in the development of the current alternative set, and the Council has approached this potential action by modifying several iterations of a program design, with substantial public input along the way. Given that we are still in a scoping process for this action, it is appropriate to solicit public feedback on this approach through the EIS process, with the expectation that it will be an iterative process to fully develop our suite of alternatives.

Differences compared to our current alternatives:

1) This approach does not include a catcher processor cooperative structure; it provides an exclusive halibut PSC limit to the CP sector, similar to Alt 2. The CP sector can use its current Am 80 structure and the existing flatfish eligibility rules to manage its GOA fishing. Absent target species allocations, it is overly complicated to provide yet another cooperative structure for CPs. Effectively, the Am 80 halibut PSC sideboards in the Gulf would be replaced by a halibut PSC apportionment for CPs.

2) Because there are no target species allocations, there are no requirements that a harvester be in a cooperative with the processor to which it has delivered groundfish historically. This provides more contrast to Alt 2. Under the current Alt 2, historical landings are what link the harvester to the processor in the first two years of the program. Because this motion does not use catch history to allocate target species to harvesters, a harvester must be in a cooperative with a processor to maximize the benefits of cooperative management, but it can be any processor it chooses with no penalty for changing. Bycatch allocations are made to the cooperative, so an option to give processors control of a portion of the cooperative's PSC has been retained. Input from staff, processors, and the public is needed on the type of processor protections that may be necessary under a bycatch only cooperative program.

3) There is no CFA or adaptive management quota in this alternative. The CFA was included for consideration in conjunction with the current Alternative 2, to fix target species quota in a community and to provide a lower cost opportunity for new entrants, in order to mitigate some of the outcomes of allocating target species quota realized in other programs. These issues are largely mitigated when there is no target species quota allocated based on individual catch histories, and there are specific options included for distributing PSC that would accommodate new entrants.

The following elements comprise **Alternative 4** for a Gulf of Alaska Trawl Bycatch Management Program for trawl catcher vessels in the Western Gulf, Central Gulf and West Yakutat areas:

1. Observer Coverage and Monitoring

All trawl vessels in the GOA will be in the 100% observer coverage category (or carry electronic monitoring at such time it is a regulated option for trawl vessels), whether they participate in the voluntary cooperative structure or the limited access fishery with trawl gear. The Council authorizes NMFS to report weekly vessel-level bycatch information as authorized under MSA Sec 402(b)(2)(A).

NMFS will develop monitoring and enforcement provisions necessary to track cooperative allocations of PSC.

This approach requires 100% observer coverage, which is necessary to account for individual cooperative members' bycatch and bycatch in the limited access fishery. This requirement is the same as the existing alternatives, and NMFS would develop the monitoring provisions necessary during the development of the EIS.

- The use of Electronic Monitoring, under full retention requirements, may be a means to mitigate some of the expense associated with 100% coverage, especially in the pollock fishery. EM efforts are currently focused on the small boat fixed gear fleet that has difficulty taking observers. In the future, we can evaluate the use of EM in the trawl fleet according to our EM strategic plan.

2. Sector allocations of target species

Allocations to the trawl sectors for WG and CG Pacific cod (Am 83), CGOA rockfish program (Am 88), and GOA pollock (Am 23) are maintained. GOA flatfish eligibility for the trawl CP sector under Am 80 is maintained.

Pollock and cod apportionments:

Option 1. Revise the GOA-wide pollock apportionments to 30% (A); 30% (B); 20% (C); 20% (D)

Option 2. Modify the pollock fishery to two seasons: Jan 20 to June 10 and June 10 to Nov 1. (If selected with Option 1, the seasonal split would be 60%/40%).

None of the options change the distribution of GOA pollock among Areas 610, 620, or 630 as established through the specifications process.

Option 3. Modify the trawl cod fishery seasons: Jan 20 – June 10 and June 10 – Nov 1. No change to the A and B seasonal allocations.

Section 2 is similar to the current set of alternatives in that it confirms that the existing sector allocations for cod, rockfish, and pollock stay the same. It also retains options to consider changing the seasons and seasonal apportionments of Gulf-wide pollock.

- We have heard in previous testimony and in separate discussion papers that shifting some of the D season pollock to earlier seasons will have a notable effect on Chinook bycatch. The Chinook bycatch reapportionment paper shows that 60% of the Chinook PSC in the Central Gulf pollock fishery is taken in the C & D seasons, and almost 90% of Chinook PSC in the Western Gulf pollock fishery is taken in the C & D seasons.
- This motion retains options that would move more of the pollock TAC into the roe season and less in the fall when Chinook bycatch rates are higher. The second option would modify the pollock seasons to two seasons, to increase flexibility in when the CV sector prosecutes their directed pollock fishery.
- Includes an option to change the season dates for cod, currently the trawl gear seasons are A season: January 20 – June 10; B season: September 1 - November 1. This change would allow the B season to start June 10, instead of being prohibited from directing fishing and subject to MRAs during the summer.

3. Sector allocations of PSC

Chinook salmon:

The pollock trawl CV Chinook salmon PSC limit is:

- Option 1. 25,000 (status quo based on Am 93)
- Option 2. 18,750 (25% reduction)

The non-pollock/non-rockfish trawl CV Chinook salmon PSC limit is 2,700 (status quo based on GOA Am 97). Any Chinook salmon PSC caught in WY comes off of the (cooperative or limited access fishery) Chinook salmon PSC limit. The CG rockfish program Chinook PSC limit for the trawl CV sector is 1,200 (status quo based on Am 97). The Chinook salmon PSC limit for the trawl CP fishery is 3,600 (status quo based on Am 97); any Chinook salmon PSC caught by CPs in the GOA accrues to this limit.

Halibut:

The apportionment of the halibut PSC limit between the CP and CV sectors will be based on halibut PSC use by each sector during:

- Option 1. 2008 - 2012
- Option 2. 2007 - 2012
- Option 3. 2003 - 2012

The halibut PSC limit (excluding the CG rockfish program) for each (CP and CV) sector is reduced by:

- Option 1. 10% (phased in over a two-year period)
- Option 2. 15% (phased in over a three-year period)
- Option 3. 20% (phased in over a three-year period)
- Option 4. 25% (phased in over a three-year period)

Different percentage reductions can be applied to the CP and CV sectors.

All CPs operating in the GOA are subject to the CP halibut PSC limit. The CP halibut PSC limit is not further divided by area (CG/WG). Vessels can only be in one sector (i.e., vessels with CP licenses that have delivered shoreside during the selected years can elect to be in the CV sector and deliver their catch shoreside).

Rockfish Program PSC:

- Option: Any Rockfish Program halibut or Chinook salmon PSC that would roll over for use in other trawl CV fisheries under the current rules (after the set aside for halibut savings) can be transferred to the trawl CV cooperatives through inter-cooperative transfer.

Section 3 addresses CP and CV sector allocations of PSC, similar to the provisions under the Council's current Alt 2. In this motion, PSC is allocated to cooperatives made up of catcher vessels and shoreside processors, and there are different options for how to make those allocations based on the members of the cooperative. Before PSC can be allocated at the cooperative level, the overall PSC limit must be established, and then it is divided among CP and CV sectors. This section includes the same options for reductions to the Chinook salmon PSC limit associated with the pollock fishery as Alt 2.

This motion does not contemplate a reduction in the amount of Chinook PSC associated with the non-pollock trawl fisheries that the Council implemented this year (3,600 to CPs and 2,700 to non-rockfish CVs). That PSC limit is much lower, was approved using more recent information on pollock and Chinook status, and is more constraining than the current pollock PSC limit.

This motion also maintains the same years on which to base a split of halibut PSC between the CP and CV sectors. Previous papers have shown very little difference in the PSC apportionments among options,

but all options are retained. This section also allows the Council to consider up to a 25% reduction in the halibut PSC limits:

- Same increase in the range of reductions that the AP approved.
- The Council may choose a different reduction for the CP and CV sectors, if desired.

Maintains an option to allow PSC rollovers from the Central Gulf rockfish program and a way to distribute it from the rockfish cooperatives to the new GOA cooperatives.

4. Voluntary inshore cooperative structure

- a. Cooperative eligibility: Shoreside processors with an eligible FPP and harvesters with an eligible FPP and a CV trawl LLP or a CP trawl LLP that did not process catch onboard during the years selected above. Eligible harvesters must have the applicable area endorsement to use PSC apportioned to the cooperative in that area.
- b. PSC species allocated to the cooperative are halibut and Chinook salmon, divided first by area (WG and CG/WY) based on historical PSC use (*options: 2003 – 2012; 2007 – 2012; 2008 - 2012*). Once in the cooperative, PSC can be used to support any target fisheries within the cooperative in that area at any time (no seasonal PSC apportionments). PSC would be apportioned to the cooperatives as follows (a different option may be selected for each area, WG and CG/WY):

Option 1. Equal shares. Annually apportion PSC limits to each cooperative on an equal share basis relative to the number of member vessels in the cooperative.

Suboption: The non-pollock Chinook salmon PSC limit and halibut PSC limit would first be divided between cod and flatfish landings, before allocating equal shares per vessel to each cooperative. A vessel must have historical target cod and/or flatfish landings in order to receive a PSC apportionment associated with the flatfish and/or cod fishery.

Option 2. Vessel capacity. Apportion halibut PSC and Chinook salmon PSC limits to each cooperative on a pro rata basis relative to the capacity of the vessel assigned to the cooperative member's LLP the first year it enters a cooperative. The vessel capacity to determine the PSC apportionment associated with that LLP does not change in subsequent years.

Suboption: Vessel capacity is based on highest GOA groundfish landing associated with the license on which the vessel is designated during 2008 – 2012 (or most recent 5 years of landings).

Option 3 (can be selected with Option 1 or 2 above): Each processor controls a portion of the annual PSC [options: 5% - 20%] within a cooperative associated with its member vessels. Each processor would assign the incremental PSC to vessels in the cooperative under the terms of the cooperative agreement. PSC made available by these agreements cannot be used by vessels owned by the processor (a vessel with more than 10% ownership by a processor using individual and collective rules for determining ownership).

Suboption 1: Cooperatives that consist exclusively of processor-owned vessels are exempt from this prohibition.

Suboption 2: No prohibition on processor-owned vessels using processor-controlled PSC. Processor-owned vessels cannot access an amount of the cooperative's processor-controlled PSC greater than the amount they brought into the cooperative.

- c. Participants can choose to either join a cooperative or operate in a limited access fishery on an annual basis. Harvesters would need to be in a cooperative with a processor by November 1 of the previous season to access a transferable PSC allocation. A trawl CV license holder can be in one cooperative per region (WG and CG/WY) on an annual basis.

Option 1: Cooperative formation requires at least [options: 2 – 5] vessels with a CV trawl LLP.

Option 2: One cooperative for CG/WY and one cooperative for WG (more than one processor is allowed in each cooperative)

- d. Each cooperative would be required to have an annual cooperative contract filed with NMFS by November 1 of the previous year. Cooperative members shall internally allocate and manage the cooperative's PSC allocation per the cooperative contract. Cooperatives are intended only to conduct and coordinate harvest activities of the members and are not FCMA cooperatives.
- e. The annual cooperative contract must include:
- Bylaws and rules for the operation of the cooperative
 - Annual fishing plan
 - Operational plan for monitoring and minimizing PSC, with vessel-level accountability
 - Provisions that prohibit, on a species or species group basis (pollock, cod, flatfish), an LLP holder/vessel that has had PSC allocated to the cooperative for that species or species group from receiving economic benefits from the cooperative for PSC quota use unless the vessel actively participates in the fishery for which the cooperative was awarded PSC. Active participation shall be determined by the cooperative agreement but shall not be less than 3 annual deliveries per species or species group (pollock, cod, flatfish).
 - Specification that processor affiliated harvesters cannot participate in price-setting negotiations except as permitted by general anti-trust law.
- f. Cooperative members are jointly and severally responsible for cooperative vessels harvesting in the aggregate no more than their cooperative's PSC allowances, as may be adjusted by annual inter-cooperative transfers.
- g. Cooperatives will submit a written report annually to the Council and NMFS. Specific criteria for reporting shall be developed by the Council and specified by NMFS as part of the program implementing regulations.
- h. Permit post-delivery transfers of annual PSC among cooperatives. All post-delivery transfers must be completed by December 31.

Section 4 outlines the structure for the voluntary inshore cooperatives, made up of trawl catcher vessels and shoreside processors. It is organized similarly to the current Alt 2 in the Council's previous motion, with some similarities and some significant differences:

1) Similar to current provisions, PSC species allocated to the cooperative are halibut and Chinook salmon, divided first by area based on historical PSC use. Once in the cooperative, PSC can be used to support any target fisheries within the appropriate area at any time (no seasonal PSC apportionments).

2) The primary difference is that there are two options provided to apportion PSC to the cooperatives: equal shares or vessel capacity. These are variations of methods that have been used in the voluntary trawl catch share agreements in Kodiak and the Western Gulf recently. There are likely other decision points that need to be included if the Council elects to apportion PSC equally by vessel or based on vessel capacity.

3) An option to allow processors to control some portion of the PSC is also included. This provision was originally intended in Alt 2 to serve as an incentive to processors to engage in improved bycatch management with harvesters and ways to achieve optimum yield. It was also intended as a way to recognize processor interests and allow processors to retain some leverage in the relationship with harvesters who hold licenses and 100% of the associated history of target species under Alt 2. The reasons for including this option still potentially hold under a bycatch only cooperative, but a lower range is proposed (5% - 20%) due to harvester's licenses not having target species history attached to them.

- May also provide a benefit to communities; it can serve as a way for processors to be more actively engaged in cooperative management and business planning for the long-term, which means stabilizing the processor workforce and providing additional year-round fishing opportunities.
- Methods to apportion PSC make up one of the most important components of this motion, and it's an area where both the analysts and public can weigh in.

4) Language was added to this option that addresses processor owned vessels, as requested in the staff discussion paper and similar to the AP motion. This motion provides a suboption that would allow processor owned vessels to use processor controlled quota if the cooperative consisted exclusively of processor-owned vessels. A suboption for consideration is included that would not allow processor-owned vessels to access an amount of the cooperative's PSC greater than the amount they brought into the cooperative.

5) Under section 4 is part C on cooperative formation. Like Alt 2, it sets a date by which harvesters and processors would need to determine whether they were going to be in a cooperative the following year. Like Alt 2, the default provision for cooperative formation is that:

- There can be multiple cooperatives, but a trawl CV license holder can only be in one cooperative per region (one in the WG and one in the CG/WY) on an annual basis, if they hold the appropriate area endorsements to fish in each region. One processor per cooperative.

This section also includes an option to elicit discussion on the advantages and disadvantages of having one cooperative in each region (WG and CG/WY) with more than one processor allowed in each cooperative. This is how the voluntary trawl catch share programs have been working. Need to explore and compare the advantages of both of those approaches; intent is to solicit public input on this particular issue.

7) Under the annual cooperative contract, this motion would require that someone could not receive a benefit from the cooperative, by leasing their PSC, without being an active participant in the fishery. This is an important issue for the Council to address, and has proven a difficult concept to try to regulate.

This provision and the limits on the amount of PSC a member can lease (which are next in Section 5) are intended to meet that objective.

5. Transferability and consolidation limits

(Annually) Allow transferability of PSC cooperative quota for annual use within the cooperative. Limit the amount of each species of annual PSC cooperative quota a person can use in the cooperative to (options: 110% - 150%) of what they brought into the cooperative.

Cooperatives can engage in inter-cooperative transfers of PSC to other cooperatives on an annual basis. Inter-cooperative transfers must be processed and approved by NMFS. Limit the amount of annual PSC cooperative quota a cooperative can transfer to another cooperative to no more than (option: 10% - 50%) of the initial cooperative allocation.

(Long-term) LLPs are transferable. PSC cannot be permanently transferred separately from a license or vessel.

Section 5 applies to the transferability of PSC on an annual basis both within the cooperative and between cooperatives. With PSC cooperative allocations only, we need to explore ways to limit consolidation that are different from our typical use caps or vessel use caps on target species quota. This element would limit the amount of PSC a person can use on an annual basis in the cooperative in order to limit consolidation and prevent the ability of a cooperative to put all of their PSC on one vessel and have others not remain active in the fishery. Included is a range as a starting point, but staff should identify how we might structure options for consolidation controls under such a transfer limit. This is an issue important to the State and fishery dependent communities, and the effectiveness of these options should be explored in the upcoming analysis. This section also provides a range of limits on the amount of PSC a cooperative can lease to another cooperative on an annual basis.

- Clarifies that LLPs continue to be transferable (anyone eligible to purchase an LLP under current regulations would continue to be able to do that)
- PSC is not an asset that can be permanently transferred; it continues to be an annual apportionment to cooperatives (or the limited access fishery) by NMFS.

6. Limited access trawl CV fishery

If a license holder chooses not to join a cooperative, it may fish in the limited access fishery with an eligible FFP and LLP endorsed for GOA trawl. Vessels must pre-register to operate in the limited access fishery by November 1 of the previous year.

Option 1. Sector-level PSC limits. PSC limits in the limited access fishery will retain status quo apportionments by area, season, and/or fishery. Halibut and Chinook salmon PSC limits are annually apportioned to the limited access fishery (sector-level) based on the number of vessels that are not assigned to a cooperative, using the same method selected for the cooperatives, as reduced by:

Suboption 1.	10%
Suboption 2.	20%
Suboption 3.	25%

Option 2. Individual PSC limits. Non-transferable halibut and Chinook salmon PSC limits are annually apportioned to the limited access fishery participants using the same method selected for the cooperatives, as reduced by:

Suboption 1.	10%
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Suboption 2.	20%
Suboption 3.	25%

A limited access fishery option must also be provided; it is retained in section 7, with a range of reductions in PSC if someone elects to be in limited access of 10 – 25%. The council could also choose not to apply any reductions by not selecting the suboptions. Two ways in which a limited access fishery could be structured are included:

- Option 1 would create a limited access opportunity similar to how other programs are structured, whereby the PSC apportioned to this fishery is sector-level, non-transferable, and fished in a competitive environment.
- Option 2 allows each PSC limit associated with a vessel to be used only by that individual platform. Effectively, if someone does not want to be in a cooperative, they could take the PSC they would have brought to the cooperative, take a reduction in that PSC amount, and fish it on their own in limited access. This PSC would not be transferable.

7. Program review

A program review would be conducted five years after implementation and every seven years thereafter.

Revisions to the Purpose and Need Statement are in bold-underline and strikeout:

Management of Gulf of Alaska (GOA) groundfish trawl fisheries has grown increasingly complicated in recent years due to the implementation of measures to protect Steller sea lions and reduced Pacific halibut and Chinook salmon Prohibited Species Catch (PSC) limits under variable annual total allowable catch (TACs) limits for target groundfish species. These changes complicate effective management of target and non-target resources, and can have significant adverse social and economic impacts on harvesters, processors, and fishery-dependent GOA coastal communities.

The current management tools in the GOA Groundfish Fishery Management Plan (FMP) do not provide the GOA trawl fleet with the ability to effectively address these challenges, especially with regard to the fleet’s ability to best reduce and utilize PSC. As such, the Council has determined that consideration of a new management regime for the GOA trawl fisheries is warranted.

The purpose of the proposed action is to create a new management structure which allocates **prohibited species catch limits and/or** allowable harvest to individuals, cooperatives, or other entities, which will mitigate the impacts of a derby-style race for fish. It is expected to improve stock conservation by creating vessel-level and/or cooperative-level incentives to eliminate wasteful fishing practices, provide mechanisms to control and reduce bycatch, and create accountability measures when utilizing PSC, ~~target, and secondary species~~. It will also **increase at-sea monitoring in the GOA trawl fisheries**, have the added benefit of reducing the incentive to fish during unsafe conditions, and improving operational efficiencies.

The Council recognizes that GOA harvesters, processors, and communities all have a stake in the groundfish trawl fisheries. The new program shall be designed to provide tools for the effective management and reduction of PSC and bycatch, and promote increased utilization of both target and secondary species harvested in the GOA. The program is also expected to increase the flexibility and economic efficiency of the GOA groundfish trawl fisheries and support the continued direct and indirect

participation of the coastal communities that are dependent upon those fisheries. These management measures could apply to those species, or groups of species, harvested by trawl gear in the GOA, and/or as well as to PSC. This program will not modify the overall management of other sectors in the GOA, or the Central GOA rockfish program, which already operates under a catch share system.

Goals and Objectives:

1. Balance the requirements of the National Standards in the Magnuson Stevens Act
2. Increase the ability of the groundfish trawl sector to avoid PSC species and utilize available amounts of PSC more efficiently by allowing groundfish trawl vessels to fish more slowly, strategically, and cooperatively, both amongst the vessels themselves and with shore-based processors
3. Reduce bycatch and regulatory discards by groundfish trawl vessels
4. Authorize fair and equitable access privileges that take into consideration the value of assets and investments in the fishery and dependency on the fishery for harvesters, processors, and communities
5. Balance interests of all sectors and provide equitable distribution of benefits and similar opportunities for increased value
6. Promote community stability and minimize adverse economic impacts by limiting consolidation, providing employment and entry opportunities, and increasing the economic viability of the groundfish harvesters, processors, and support industries
7. Improve the ability of the groundfish trawl sector to achieve Optimum Yield, including increased product retention, utilization, landings, and value by allowing vessels to choose the time and location of fishing to optimize returns and generate higher yields
8. Increase stability relative to the volume and timing of groundfish trawl landings, allowing processors to better plan operational needs as well as identify and exploit new products and markets
9. Increase safety by allowing trawl vessels to prosecute groundfish fisheries at slower speeds and in better conditions
10. Include measures for improved monitoring and reporting
11. Increase the trawl sector's ability to adapt to applicable Federal law (i.e., Endangered Species Act)
12. Include methods to measure the success and impacts of all program elements
13. Minimize adverse impacts on sectors and areas not included in the program
14. Promote active participation by owners of harvest vessels and fishing privileges