

BSAI Pacific cod Trawl CV Supplemental Information

The following supplemental information covers two issues. The first is an additional request for clarification regarding Council intent for the <60' Aleutian Islands (AI) trawl vessels that were awarded a severable AI trawl endorsement under the trawl reGENCY action, Amendment 92¹ (2009) to the Bering Sea/Aleutian Islands (BSAI) Fishery Management Plan. The second is providing additional information relative to the AFA and non-AFA vessels using LLP licenses and the years they were active.

I. Request for Clarification on Eight Severable AI Trawl Endorsements

There is a total of eight LLP licenses that qualified for the AI severable trawl endorsement. However, the AI Pacific cod trawl gear catch by vessels using Amendment 92 AI trawl endorsed LLP licenses are reported in the CAS data with no LLP license number in the LLP license field. Because the LLP license number was reported as a blank field, the information presented in the preliminary review document did not count any of these licenses as qualified under any option. Of the LLP licenses, one of the eight LLP licenses did have a Bering Sea (BS) trawl endorsement but did not report any targeted Pacific cod landings in the BS. It is presented in the tables of the preliminary review paper as not being qualified. The other seven vessels (LLP licenses) are not reported in the preliminary review paper because they did not have an LLP license number reported in the catch data and they did not have a BS or AI trawl endorsement reported in the BS or AI fields in the LLP license file. These LLP licenses do have a flag in the LLP license file in the "AITR<60" column that identifies the holder of the LLP license as eligible to fish with trawl gear in the open access AI Pacific cod fishery.

Looking at the activity of these eight LLP licenses in the open access fishery, one vessel with these LLP licenses never fished BSAI Pacific cod from 2009 through 2011, three vessels fished in both 2009 and 2010, one fished only in 2010², and four fished only in 2009. Given that the Council's options only reach back to 2010 to qualify under Alternative 4, four of the LLP licenses could qualify if the vessel owner could assign the catch history from the vessel to those LLP licenses. Because none of the vessels fished for Pacific cod in the BSAI open access trawl fishery after 2010, none of the LLP licenses would qualify under Alternative 4, options 2 and 4. Those options do not include 2010 as a qualifying year.

Table 1 LLP licenses that were issued a transferable AI trawl endorsement under BSAI Amendment 92.

LICENSE	TYPE	MLOA	TRANSFERABLE	ADFG	VESSEL	AI	BS	PCOD	AITR<60
LLG4859	CV	59	Yes	57469	CELTIC	N	N	WG CV Pot	Y
LLG3124	CV	59	Yes	61679	EQUINOX	N	Non-trawl; Trawl	WG CV Pot	Y
LLG2071	CV	59	Yes	46701	KAREN EVICH	N	N	N	Y
LLG1313	CV	59	Yes	47952	BRUIN	N	N	WG CV Pot	Y
LLG4862	CV	59	Yes	40762	ADVANCER	N	N	WG CV Pot	Y
LLG3658	CV	59	Yes	64667	OCEAN STORM	N	N	N	Y
LLG2831	CV	59	Yes	41628	CAMERON	N	N	N	Y
LLG1292	CV	59	Yes	62288	MARAUDER	N	Non-trawl	N	Y

Source: RAM LLP license file (May 28, 2018)

Five of the vessels participated in the AI State GHF fishery during 2012 or later. It is assumed that State GHF fishery landings do not count toward qualification for a federal LLP license.

¹ 74 FR 41080

² This vessel had a BS trawl endorsement, but never fished in the BS. The only landings for the vessel did not report the LLP license number. Therefore, it would appear as not qualified in the tables for the preliminary review document.

The Council could also define other options for these LLP licenses to qualify or be exempted from the current program. Any special provisions that would be applied to these specific LLP licenses will need to be included in the suite of alternatives and options considered. If special provisions are developed, the Council may wish to consider addressing why the special provisions were developed in the Problem Statement.

II. Additional Data on AFA and Non-AFA Vessels and LLP Licenses

The second issue addressed in this supplemental information is additional data on the AFA and non-AFA vessels activity relative to the activity of the AFA and non-AFA LLP licenses. Table 2 shows the years the AFA and non-AFA LLP license were used (shaded cells) in the open access BSAI Pacific cod trawl fishery, while Table 3 shows the years AFA and non-AFA CVs were used in the open access BSAI Pacific cod trawl fishery. Also note that the seven LLP licenses described above without a BS trawl endorsement are excluded from this table. If they were included, they would have been added to the non-AFA section of the table.

Table 2 AFA and non-AFA LLP licenses used in the open access BSAI Pacific cod trawl fishery, 2009 through 2017

Number	Vessel	Year										Years of participation			
		2009	2010	2011	2012	2013	2014	2015	2016	2017	2010-2017	2012-2017	2010-2015	2012-2015	
1	Non-AFA											7	5	5	3
2	Non-AFA											8	6	6	4
3	Non-AFA											8	6	6	4
4	Non-AFA											8	6	6	4
5	Non-AFA											8	6	6	4
6	Non-AFA											7	5	5	3
7	Non-AFA											5	4	3	2
8	Non-AFA											3	3	1	1
9	Non-AFA											2	2	0	0
10	Non-AFA											5	4	4	3
11	Non-AFA											4	2	3	1
12	Non-AFA											3	2	2	1
13	Non-AFA											4	3	4	3
14	Non-AFA											2	1	2	1
1	AFA											8	6	6	4
2	AFA											8	6	6	4
3	AFA											8	6	6	4
4	AFA											8	6	6	4
5	AFA											8	6	6	4
6	AFA											8	6	6	4
7	AFA											8	6	6	4
8	AFA											8	6	6	4
9	AFA											8	6	6	4
10	AFA											8	6	6	4
11	AFA											8	6	6	4
12	AFA											8	6	6	4
13	AFA											8	6	6	4
14	AFA											8	6	6	4
15	AFA											8	6	6	4
16	AFA											8	6	6	4
17	AFA											8	6	6	4
18	AFA											8	6	6	4
19	AFA											8	6	6	4
20	AFA											8	6	6	4
21	AFA											8	6	6	4
22	AFA											7	6	5	4
23	AFA											7	6	5	4
24	AFA											7	6	5	4
25	AFA											7	6	5	4
26	AFA											7	6	5	4
27	AFA											7	6	5	4
28	AFA											7	6	5	4
29	AFA											6	6	4	4
30	AFA											6	5	4	3
31	AFA											5	5	3	3
32	AFA											5	5	3	3
33	AFA											5	5	3	3
34	AFA											4	4	2	2
35	AFA											4	4	2	2
36	AFA											4	4	2	2
37	AFA											7	5	5	3
38	AFA											5	4	3	2
39	AFA											3	3	1	1
40	AFA											3	3	1	1
41	AFA											7	5	5	3
42	AFA											7	5	5	3
43	AFA											3	3	1	1
44	AFA											5	4	3	2
45	AFA											5	3	3	1
46	AFA											4	3	2	1
47	AFA											2	2	0	0
48	AFA											2	2	0	0
49	AFA											2	2	0	0
50	AFA											7	5	6	4
51	AFA											4	3	3	2
52	AFA											3	3	2	2
53	AFA											1	1	0	0
54	AFA											7	5	6	4
55	AFA											2	2	1	1
56	AFA											2	1	1	0
57	AFA											5	4	5	4
58	AFA											1	1	1	1
59	AFA											1	1	1	1
60	AFA											5	3	5	3
61	AFA											2	2	2	2
62	AFA											1	1	1	1
63	AFA											1	1	1	1
64	AFA											1	1	1	1
65	AFA											1	1	1	1
66	AFA											3	2	3	2
67	AFA											1	1	1	1
68	AFA											1	1	1	1
69	AFA											3	1	3	1
70	AFA											3	1	3	1
71	AFA											2	1	2	1
72	AFA											1	0	1	0
73	AFA											0	0	0	0
Total Non-AFA		6	7	12	10	11	6	7	9	12	14	14	13	13	
Total AFA		41	38	39	48	45	48	46	52	53	72	71	67	65	
Total All CVs		47	45	51	58	56	54	53	61	65	84	83	80	78	

Source: AKFIN summary of CAS data

Table 3 AFA or non-AFA CVs in the BSAI open access Pacific cod trawl target fishery, 2009 through 2017

Number	Vessel	Year										Years of participation				
		2009	2010	2011	2012	2013	2014	2015	2016	2017	2010-2017	2012-2017	2010-2015	2012-2015		
1	Non-AFA												8	6	6	4
2	Non-AFA												8	6	6	4
3	Non-AFA												6	6	4	4
4	Non-AFA												8	6	6	4
5	Non-AFA												5	3	3	1
6	Non-AFA												7	5	5	3
7	Non-AFA												5	4	3	2
8	Non-AFA												3	3	1	1
9	Non-AFA												2	2	0	0
10	Non-AFA												5	4	4	3
11	Non-AFA												3	2	2	1
12	Non-AFA												1	1	0	0
13	Non-AFA												4	3	4	3
14	Non-AFA												1	1	1	1
15	Non-AFA												4	2	4	2
16	Non-AFA												2	1	2	1
17	Non-AFA												3	1	3	1
18	Non-AFA												1	1	1	1
19	Non-AFA												1	0	1	0
20	Non-AFA												0	0	0	0
21	Non-AFA												1	0	1	0
22	Non-AFA												0	0	0	0
23	Non-AFA												1	0	1	0
24	Non-AFA												0	0	0	0
25	Non-AFA												1	0	1	0
26	Non-AFA												0	0	0	0
1	AFA												8	6	6	4
2	AFA												7	6	5	4
3	AFA												7	6	5	4
4	AFA												8	6	6	4
5	AFA												8	6	6	4
6	AFA												7	6	5	4
7	AFA												8	6	6	4
8	AFA												8	6	6	4
9	AFA												8	6	6	4
10	AFA												6	6	4	4
11	AFA												8	6	6	4
12	AFA												8	6	6	4
13	AFA												8	6	6	4
14	AFA												8	6	6	4
15	AFA												7	6	5	4
16	AFA												7	6	5	4
17	AFA												8	6	6	4
18	AFA												8	6	6	4
19	AFA												8	6	6	4
20	AFA												8	6	6	4
21	AFA												8	6	6	4
22	AFA												8	6	6	4
23	AFA												8	6	6	4
24	AFA												8	6	6	4
25	AFA												8	6	6	4
26	AFA												8	6	6	4
27	AFA												8	6	6	4
28	AFA												8	6	6	4
29	AFA												8	6	6	4
30	AFA												8	6	6	4
31	AFA												6	5	4	3
32	AFA												5	5	3	3
33	AFA												4	4	2	2
34	AFA												4	4	2	2
35	AFA												7	5	5	3
36	AFA												5	4	3	2
37	AFA												3	3	1	1
38	AFA												7	5	5	3
39	AFA												7	5	5	3
40	AFA												3	3	1	1
41	AFA												5	4	3	2
42	AFA												4	3	2	1
43	AFA												5	3	3	1
44	AFA												2	2	0	0
45	AFA												2	2	0	0
46	AFA												7	5	6	4
47	AFA												4	3	3	2
48	AFA												3	3	2	0
49	AFA												1	1	0	0
50	AFA												2	2	1	1
51	AFA												2	1	1	0
52	AFA												1	1	1	1
53	AFA												5	3	5	3
54	AFA												4	2	4	2
55	AFA												1	1	1	1
56	AFA												1	1	1	1
57	AFA												1	1	1	1
58	AFA												1	1	1	1
59	AFA												2	1	2	1
60	AFA												0	0	0	0
61	AFA												0	0	0	0
62	AFA												1	0	1	0
Total Non-AFA		14	11	12	11	11	6	8	9	12			22	18	20	16
Total AFA		41	38	39	48	45	48	46	52	53			60	59	57	55
Total All CVs		47	45	51	58	56	54	53	61	65			82	77	77	71

Source: AKFIN summary of CAS data