
D1 BSAI PACIFIC COD SMALL BOAT ACCESS

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BACKGROUND

The Council requested a discussion paper in October 2019

- Response to community concerns and access challenges identified for smaller CVs operating in the BSAI Pacific cod less than 60 ft HAL or pot sector
 - Including increased participation within the less than 60 ft sector;
 - And inter-sector competition from larger HAL or pot CVs greater than or equal to 58 ft LOA with increased capacity and efficiency
- The Council's motion directed staff to evaluate "the potential impact of expanding the allowable participants to fish off of the jig sector allocation to small fixed gear catcher vessels (e.g., <57', trip limits up to 15,000 lbs., pot limits less than 25 pots)"



BACKGROUND

Opportunity for the Council to discuss and give direction for potential future work related to small vessel access opportunities in the BSAI Pacific cod less than 60 ft HAL or pot sector

- Presentation outline:
 - Background on the BSAI Pacific cod less than 60 ft HAL or pot CV sector
 - Background on the BSAI Pacific cod jig sector
 - Options for a BSAI Pacific cod small vessel sector allocation
 - Options for defining a new BSAI Pacific cod small vessel sector
 - Conclusions and potential next steps



BSAI PACIFIC COD LESS THAN 60 FT HAL OR POT CV SECTOR

- This sector includes all CVs that are less than 60 ft LOA using HAL or pot gear
- Vessels in the less than 60 ft HAL or pot sector generally need a non-trawl LLP to participate in the Federal fisheries
- This sector receives their entire allocation of BSAI Pacific cod TAC on January 1 (see Table 2)
 - The less than 60 ft HAL or pot CV sector has had a 2 percent BSAI Pacific cod allocation since Amendment 85 was implemented in 2008
 - **The sector relies on reallocations from other sectors in order to have a re-opening later in the year**



BSAI PACIFIC COD LESS THAN 60 FT HAL OR POT CV SECTOR

Sector	Year	Total	HAL/Pot CV ≤ 57 ft LOA	HAL/Pot CV > 57 ft LOA
HAL/Pot CV < 60 ft LOA	2004	18	3	15
	2005	28	16	12
	2006	27	15	12
	2007	29	17	12
	2008	31	13	18
	2009	28	12	16
	2010	23	6	17
	2011	22	7	15
	2012	24	7	17
	2013	27	9	18
	2014	21	7	14
	2015	25	7	18
	2016	22	5	17
	2017	24	5	19
	2018	29	7	22
2019	36	10	26	
2020	41	11	30	

Table 3, pg. 6 - Total vessel count in the BSAI Pacific Cod less than 60 ft HAL or pot sector and by LOA subgroups

- Two vessel LOA subgroups are evaluated:
 - Vessels less than or equal to 57 ft LOA
 - Vessels greater than 57 ft LOA

- Historically most vessels in the less than 60 ft HAL or pot CV sector are greater than 57 ft LOA

- Vessel length for the less than 60 ft HAL or pot CV sector has ranged from 26 ft (one participating vessel in 2013) to 59 ft LOA (two participating vessels) since 2008



BSAI PACIFIC COD LESS THAN 60 FT HAL OR POT CV SECTOR

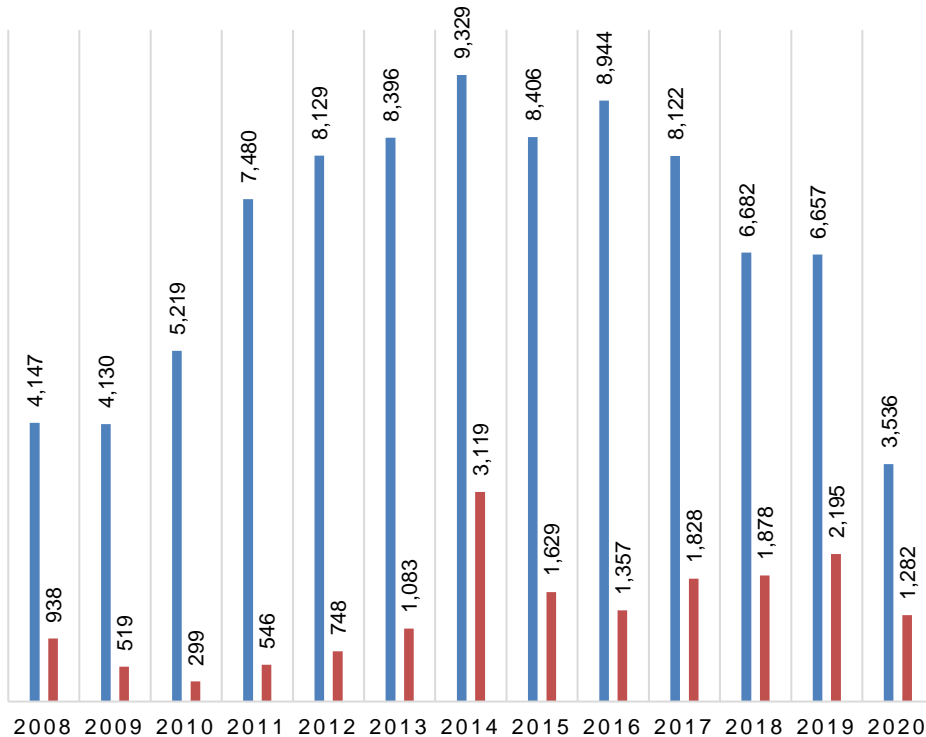
Sector	Year	Initial Allocation (mt)	Reallocation (mt) from jig sector	Reallocation (mt) from other sectors	Final Allocation (mt)	Final allocation as a percent of initial allocation	Jig reallocation as a percent of final allocation
HAL/Pot CV < 60 ft LOA	2008	3,033	2,024	153	5,210	172%	39%
	2009	3,137	1,600	-303	4,434	141%	36%
	2010	2,998	1,760	751	5,509	184%	32%
	2011	4,055	1,970	2,980	9,005	222%	22%
	2012	4,645	2,800	1,435	8,880	191%	32%
	2013	4,627	3,200	1,350	9,177	198%	35%
	2014	4,518	3,073	4,427	12,018	266%	26%
	2015	4,438	3,018	3,174	10,630	240%	28%
	2016	4,476	3,050	3,148	10,674	238%	28%
	2017	4,259	2,886	2,126	9,271	218%	31%
	2018	3,627	2,400	2,721	8,748	241%	24%
	2019	3,214	2,100	4,486	9,800	305%	21%
2020	2,766	1,927	274	4,967	180%	39%	

Table 4, pg. 7 – BSAI Pacific cod less than 60 ft HAL or pot CV sector initial allocation, reallocation from other sectors, and final allocations from 2008 to 2020



BSAI PACIFIC COD LESS THAN 60 FT HAL OR POT CV SECTOR

- BSAI Pacific cod landings (mt) HAL/Pot CV > 57 ft LOA
- BSAI Pacific cod landings (mt) HAL/Pot CV ≤57 ft LOA



- The greater than 57 ft LOA subgroup harvests the majority of the less than 60 ft HAL or pot CV sector final allocation
- On average, the greater than 57 ft LOA subgroup has harvested approximately 84% of the less than 60 ft HAL or pot CV sector's final allocation of BSAI Pacific cod since 2008

Figure 1, pg. 8 – Targeted BSAI Pacific Cod harvest (mt) by vessel LOA subgroup from 2008 to 2020



BSAI PACIFIC COD LESS THAN 60 FT HAL OR POT CV SECTOR

Both vessel LOA subgroups have a relatively similar level of dependence on the Federal BSAI Pacific cod fishery from 2011 to 2019

- On average, Federal BSAI Pacific cod accounts for:
 - 21 percent of the less than or equal to 57 ft LOA HAL or pot CV subgroup gross ex-vessel revenue
 - 26 percent for HAL or pot CVs that are greater than 57 ft LOA gross ex-vessel revenue
- At the vessel level:
 - 20 CVs from the entire less than 60 ft HAL or pot sector depend on the Federal BSAI Pacific cod fishery for more than 50 percent of their gross ex-vessel revenues
 - 14 of these vessels are greater than 57 ft LOA



BSAI PACIFIC COD JIG SECTOR

- The jig sector includes all vessels (CVs and CPs) using jig gear
 - Vessels fishing in this sector do not need an LLP license in the BSAI if they are less than 60 ft LOA and use no more than five jig machines, one line per machine, and 15 hooks per line
- The number of jig vessels participating in the directed BSAI Pacific cod fishery has varied over the last 18 years, ranging from a low of one vessel in 2017 and 2018 to a high of 19 vessels in 2004
- In 2020, three vessels participated in the BSAI Pacific cod jig fishery
- One jig vessel has shown consistent participation in the target fishery over the last five years (2016 to 2020) and would likely be the most impacted by this action



BSAI PACIFIC COD JIG SECTOR

Sector	Year	Initial allocation (mt)	Final allocation (mt)	Reallocations (mt)	Final allocation as a percent of initial allocation
Jig	2008	2,134	180	-1,954	8%
	2009	2,207	25	-2,182	1%
	2010	2,110	350	-1,760	17%
	2011	2,850	510	-2,340	18%
	2012	3,263	463	-2,800	14%
	2013	3,251	51	-3,200	2%
	2014	3,174	101	-3,073	3%
	2015	3,118	100	-3,018	3%
	2016	3,144	94	-3,050	3%
	2017	2,993	13	-2,980	0%
	2018	2,548	149	-2,399	6%
	2019	2,259	159	-2,100	7%
2020	1,945	18	-1,927	1%	

- The jig sector has an initial allocation of 1.4 percent
 - The jig sector has three seasonal allowances: Jan 1—Apr 30 (60%); Apr 30 – Aug 31 (20%), and Aug 31—Dec 31 (20%)
 - Unused jig quota is typically reallocated to the less than 60 ft HAL or pot CV sector on a *seasonal basis*
 - Overall, the jig sector has had a relatively low level of participation in the directed BSAI Pacific cod fishery

Table 6, pg. 10 – BSAI Pacific cod jig sector initial allocation, reallocation to other sectors, and final allocations from 2008 to 2020



BSAI PACIFIC COD SMALL VESSEL SECTOR ALLOCATION

Options evaluated in the discussion paper:

1. No action
 - The less than 60 ft HAL or pot CV and jig sectors' allocations and reallocations would remain unchanged as established under Amendment 85
2. Reclassify the current BSAI Pacific cod jig sector by combining smaller HAL or pot CVs and jig sector vessels, and allow this new small vessel sector to fish the 1.4 percent jig allocation
3. Create a new BSAI Pacific cod CV sector composed of small HAL or pot CVs by separating these vessels from the current less than 60 ft HAL or pot CV sector
4. Consider developing a Limited Access Privilege Program (LAPP) for the less than 60 ft HAL or pot sector
 - Fishing Community or Regional Fishing Association entities

Reminder:

If the Council chooses to move this action forward, an amendment to the BSAI Groundfish FMP is necessary to change the allocations for each sector, reclassify the existing sectors, and/or create a new sector because the BSAI Pacific cod allocations were assigned as an amendment to the BSAI Groundfish FMP



OPTION 2 – RECLASSIFY THE CURRENT BSAI PACIFIC COD JIG SECTOR

Year	Jig sector initial allocation (mt)	Jig sector final allocation (mt)	BSAI Pacific cod target landings (mt) jig sector	BSAI Pacific cod target landings (mt) ≤57 ft LOA vessels	BSAI Pacific cod target landings (mt) combined sector	Combined sector landings as percent of Jig sector initial allocation
2008	2,134	180	174	938	1,112	52%
2009	2,207	25	13	519	532	24%
2010	2,110	350	344	299	643	30%
2011	2,850	510	504	546	1,050	37%
2012	3,263	463	85	748	833	26%
2013	3,251	51	12	1,083	1,095	34%
2014	3,174	101	2	3,119	3,121	98%
2015	3,118	100	28	1,629	1,657	53%
2016	3,144	94	47	1,357	1,404	45%
2017	2,993	13	13	1,828	1,841	62%
2018	2,548	149	56	1,878	1,932	76%
2019	2,259	159	146	2,195	2,341	104%
2020	1,945	18	10	1,282	1,292	66%

Table 7, pg. 12 – BSAI Pacific cod landings made by the less than or equal to 57 ft HAL or pot CV subgroup and the jig sector from 2008 to 2020

The Council could reclassify the jig sector by combining smaller HAL, pot and jig vessels

- The Council could consider allowing vessels in the newly combined gear sector to fish off the current jig sector's 1.4 percent allocation of BSAI Pacific cod
- On average, this hypothetical new sector would have utilized 54 percent of the jig sector's initial allocation of BSAI Pacific cod



OPTION 2 – ADDITIONAL CONSIDERATIONS

If the Council chose to move forward with Option 2, it would be important to consider whether a new small vessel sector would have seasonal apportionments

- The less than 60 ft HAL or pot CV sector does not have seasonal allocations, but the jig sector's allocation is apportioned on a trimester basis
- Allocating BSAI Pacific cod TAC on an annual basis to jig vessels may require a Section 7 Consultation
- Jig vessels generally operate in the B season, and could be constrained by either approach (i.e., seasonal or annual allocation)



OPTION 3 – CREATE A NEW BSAI PACIFIC COD SECTOR

The Council could create a new BSAI Pacific cod CV sector composed of small HAL or pot CVs

- This would effectively create a tenth BSAI Pacific cod sector
- In terms of the allocation:
 1. Allow smaller HAL or pot CVs targeting BSAI Pacific cod to competitively fish the current less than 60 ft HAL or pot CV BSAI Pacific cod allocation and then fish the jig sector's allocation (1.4 percent) when the less than 60 ft HAL or pot CV sector's season closes
 2. The Council could choose to re-evaluate the current BSAI Pacific cod allocations



OPTION 4– DEVELOP A LAPP FOR THE LESS THAN 60 FT HAL OR POT SECTOR

The Council could develop a Limited Access Privilege Program (LAPP) for the less than 60 ft HAL or pot sector

- Develop a LAPP that allows less than 60 ft HAL or pot CV owners to receive individual quota and form cooperatives
- The Council could also establish Fishing Community (FC) or Regional Fishing Association (RFA) entities under a LAPP for a BSAI Pacific cod sector

Fishing Community:

- Eligible to receive limited access privileges during the initial allocation process
- The Council could develop criteria for FCs to receive initial allocations
- FCs are not voluntary associations and would be the holder of an allocated privilege until transferred

Regional Fishing Association:

- RFAs are voluntary associations formed according to criteria developed by the Council
- would consist of participants who hold quota for the region covered by the RFA
- RFAs cannot receive initial allocations of limited access privileges



OPTIONS FOR DEFINING A NEW SMALL VESSEL SECTOR

Options evaluated in the discussion paper:

1. Vessel size limits
2. Fishing trip limits
3. Gear limits
4. LLP area endorsement
5. Super-exclusive designation



VESSEL SIZE LIMIT

The Council could develop a vessel size limit to define eligibility for a new small HAL or pot CV sector for BSAI Pacific cod

Potential considerations:

- Vessel owners must report the LOA to NMFS on their FFP and to the Alaska Commercial Fisheries Entry Commission
 - Vessel owners may not report changes
- Using a length-based system for categorizing vessel eligibility may present economic incentives to vessel owners to alter the vessel's size
 - Larger vessels could modify their vessel to decrease LOA while maintaining its width and efficiency
 - Smaller vessels could modify their vessels to increase LOA to compete in a sector with larger BSAI Pacific cod TAC



FISHING TRIP LIMIT

Vessel LOA Subgroup	BSAI Pacific cod trips <15,000 lbs.	BSAI Pacific cod trips 15,000-19,999 lbs.	BSAI Pacific cod trips 20,000-25,000 lbs.	BSAI Pacific cod trips >25,000 lbs.
HAL/Pot CV ≤ 57 ft LOA	349	108	96	350
HAL/Pot CV > 57 ft LOA	188	85	79	1,874
Total	537	193	1,755	2,224

Table 10, pg. 17 – Count of BSAI Pacific Cod trips with landings less than and greater than 15,000 lbs. from 2009 to 2019 by less than 60 ft HAL or pot CVs

The Council could consider using a fishing trip limit to define eligibility for a smaller BSAI Pacific cod vessel sector

Potential considerations:

- Currently there are no fishing trip limits for the less than 60 ft HAL or pot sector
- It is possible that a CV's fishing trip size may not reflect its ability to compete in the sector
- Could affect on-the-water safety
- Fishing trip limit will need to be enforced by auditing landings which could be difficult to achieve



GEAR LIMIT

The Council could develop a gear limit to define eligibility for a new BSAI Pacific cod small vessel sector

Potential considerations:

- To move this option forward, the Council would also need to consider a gear limit for HAL CVs
- Observer data could identify the specific number of pots in a set, but this data will not show how many sets a vessel is using
 - There is no way to know if a pot CV pulled multiple sets of pots on a given trip



LLP AREA ENDORSEMENT

The Council could develop additional subarea endorsements for an LLP

Potential considerations:

- VMS information could provide data to assess whether smaller HAL or pot vessels are fishing within a particular subarea
 - Vessels using jig gear are not required to have an endorsement on their FFP indicating the use of pot, trawl, or HAL gear which means they are exempt from the VMS requirement except for the Aleutian Islands
- LLPs with area sub endorsements could provide a secure form of access to BSAI Pacific cod to those persons holding such licenses
 - It is possible that additional endorsements will raise the cost of entry for the fishery over the long run



SUPER-EXCLUSIVE DESIGNATION

Some expressed interest in whether “super-exclusive” status could be designated for smaller HAL or pot CVs operating in the current less than 60 ft HAL or pot BSAI Pacific cod sector

- State of Alaska Constitution gives authority to the State or Alaska Board of Fisheries to designate state water fisheries as super-exclusive
 - Not a term that exists in Federal law
- The Council could achieve a similar effect by crafting narrow eligibility criteria or restricting access to a small number of smaller HAL or pot CVs for valid conservation and management reasons



NEXT STEPS

If the Council chooses to request additional information or move the action forward to analysis, some of the primary overarching criteria to consider are:

- Identify the specific objectives of creating new access opportunities for smaller BSAI Pacific cod HAL or pot CVs
- Determine the BSAI Pacific cod allocation for smaller BSAI Pacific cod HAL or pot CVs (and potentially jig CV or C/Ps) (Section 4)
- Identify the specific criteria for defining what constitutes a smaller BSAI Pacific cod HAL or pot CV (Section 5)

