
C6 BSAI PACIFIC COD POT CP LLP LICENSES

SAM CUNNINGHAM, DECEMBER 2020



OVERVIEW

- History of LLP License endorsements and cod sector allocations
- Alternatives and Outcomes
- Purpose & Need for action
- Fishery information
- Impacts
- Management & Monitoring



REGULATORY HISTORY

Am39 **2000** – LLP license limitations in effect
Beginning to address harvest capacity prior to crab and gfish rationalization

Am64 **2000** – First cod allocations by gear type; seasonal apportionment of cod TAC
Response to increased cod participation by historical crab vessels

Am67 **2002** – LLP endorsements for non-trawl vessels >60' based on 1995-98 catch
Reduced pool of latent non-trawl effort from 67 vessels (only 10 active since '95)

Am77 **2004** – Split pot sector into CPs and CVs
Results in 8 Pacific cod pot gear CP LLP license endorsements

Am85 **2008** – Sector allocations for non-CDQ cod TAC; Pot CPs get 1.5% of BSAI total
NMFS can make inseason reallocations between sectors



ALTERNATIVES

Alternative 1: No action

Alternative 2: Remove the Bering Sea and Aleutian Islands Pacific cod endorsements on CP pot LLP licenses unless the license is credited with a minimum directed landing of 1,000 metric tons in the management area based on the following threshold criteria:

Option 1: 2005 – 2019 | Suboptions: A – In any of 3 years
 Option 2: 2012 – 2019 | B – In any of 4 years

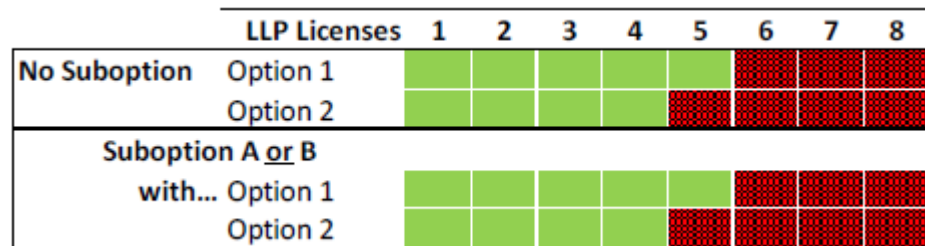


Figure ES-1, p.6

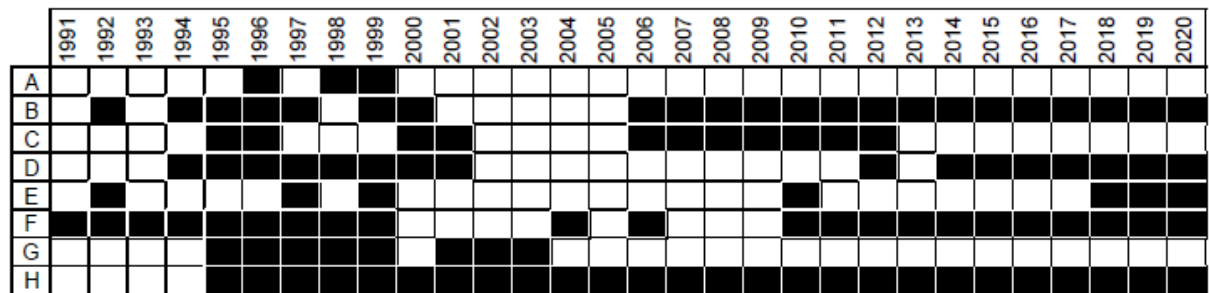


Figure 3-5, p.33



PURPOSE & NEED

Amendment 85 assigned a portion of the Bering Sea/Aleutian Islands Pacific cod TAC to the pot CP sector with the primary goals of aligning Pacific cod allocations with actual dependency and use and providing stability to all sectors. Three major changes have occurred since the implementation of Amendment 85, which has resulted in less stability for the dependent vessels on which the Amendment 85 allocation was based:

- 1. Low crab TACs and consolidation within the crab fisheries has provided increased flexibility for pot CPs;*
- 2. The TAC for Pacific cod in the BSAI has decreased over the last several years; and*
- 3. The availability of rollovers to the pot CP sector has declined.*

The Council is considering action to eliminate latent capacity in the fishery in order to increase stability for cod dependent pot CPs, to maintain consistently low rates of halibut and crab bycatch, and to ensure that condensed fishing seasons do not result in safety-at-sea concerns.

- Economic and operational stability *relative to No Action*
- Does not create additional harvest opportunity
- Other benefits may be contingent on voluntary actions by participants



FISHERY DESCRIPTION

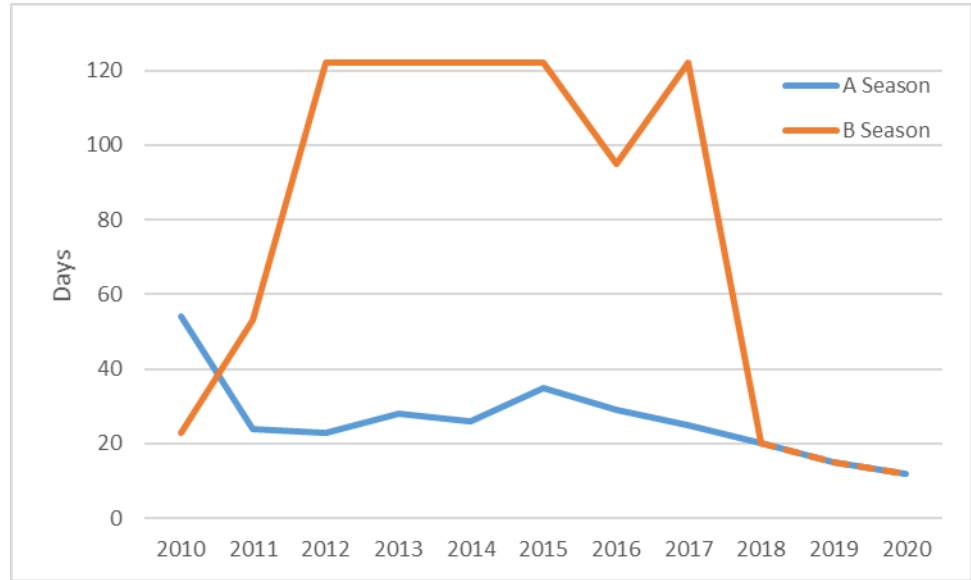


Figure 3-2, p.29

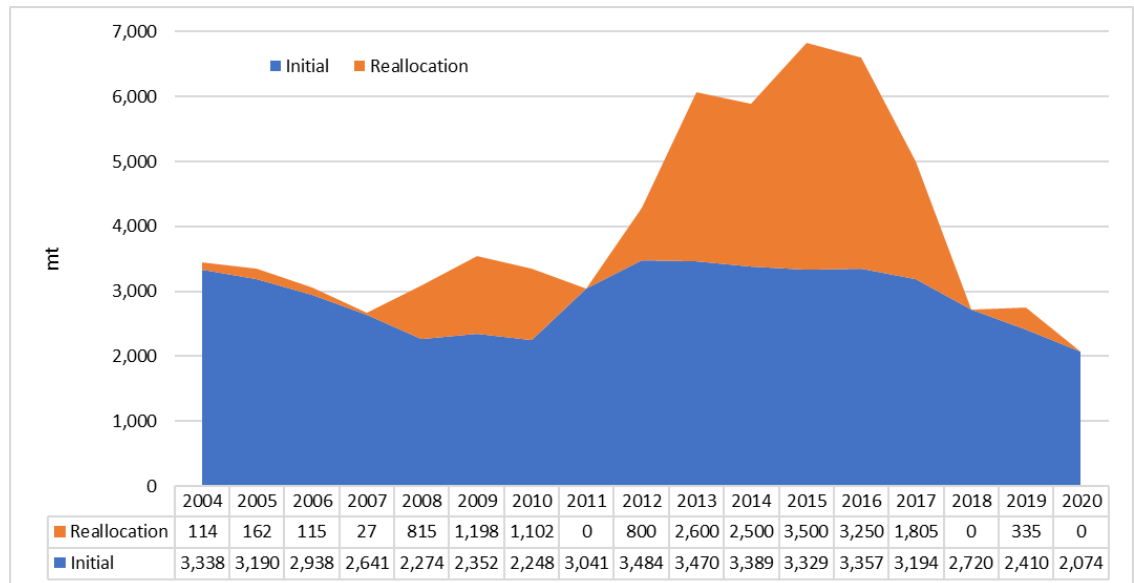


Figure 3-3, p.30



FISHERY DESCRIPTION

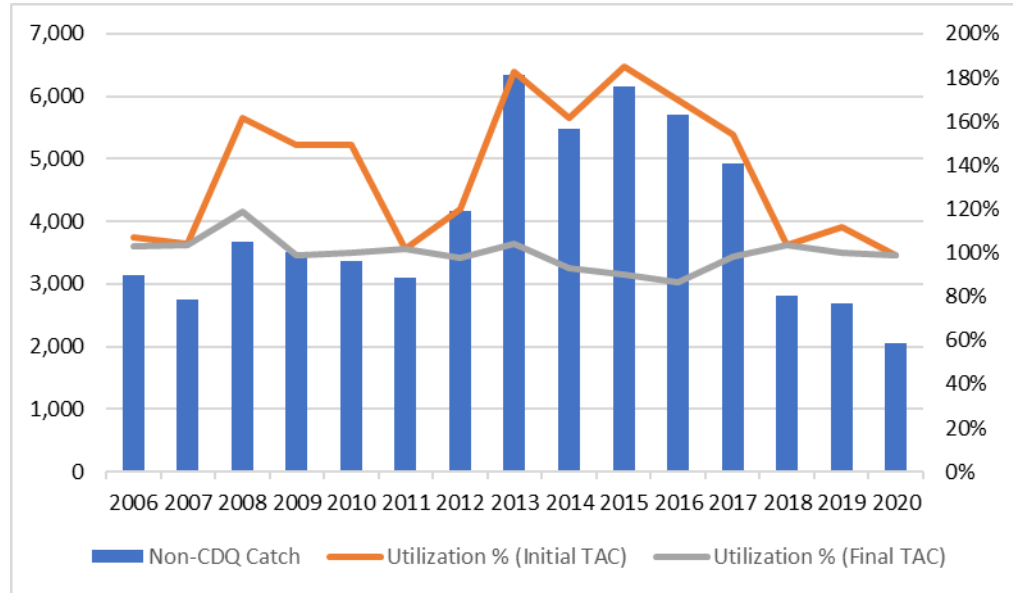


Figure 3-7, p.37

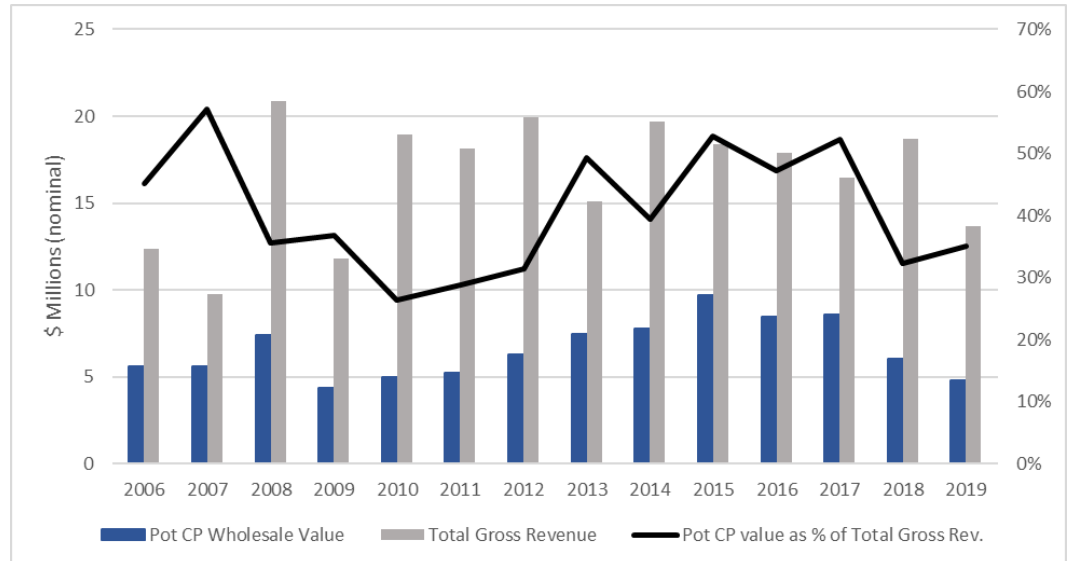


Figure 3-10, p.43



POT CP VESSELS

- 4 to 5 active vessels – the 5th entering in 2018
- 2 to 3 vessels also fish CDQ
- Limited participation in GHL fisheries due to vessel size
- Community ties:
 - Operation: Primarily Dutch Harbor/Unalaska (Table 3-12)
 - LLP ownership
 - Active: Seattle and Anchorage (Tables 3-9 to 3-11)
 - Inactive: Seattle, Kodiak, Wasilla



IMPACTS: ALTERNATIVE 1

- “No Action” is not necessarily the same as “Status Quo”
- Policy choice: Future opportunity vs. “stability”
- Maintains transfer value of all Pot CP endorsed LLP licenses
- Inducement of additional vessels is less linked to TAC than to what is happening in other fisheries
- Operational inefficiencies: travel cost, labor productivity, crew retention, safe operation, flexibility to respond to bycatch or cod quality



IMPACTS: ALTERNATIVE 2

- Right-sizing the fishery:
 - Is the answer different now than it was when Am 67 was passed?
 - Is the Council focused solely on the current context of the fishery or open to medium- to long-term developments that are not known?
- Other opportunities for LLPs that lose the Pot Cod CP endorsement
- Operational, bycatch, and safety benefits may be contingent on intra-sector cooperation
 - Whether that can be achieved with four, five, or eight endorsed licenses is a policy decision



MONITORING & MANAGEMENT

NMFS is suggesting the following monitoring elements:

- Level 2 observers
- Pre-cruise meeting notification
- Certified observer sampling station & motion compensated platform scale



QUESTIONS?

SAM
CUNNINGHAM
SAM.CUNNINGHAM@NOAA.GOV

