

BSAI & GOA Trawl LLP Recency Analysis – Draft Problem Statement and Alternatives

DRAFT PROBLEM STATEMENT

The Council's adopted the following draft problem statement on June 11, 2006.

Trawl catcher vessel eligibility is a conflicting problem among the Bering Sea, Gulf of Alaska and Aleutian Islands. In the Bering Sea and Gulf of Alaska, there are too many latent licenses and in the Aleutian Islands there are not enough licenses available for trawl catcher vessels.

In the Bering Sea and GOA, the trawl catcher vessel groundfish fisheries in the BSAI and trawl vessel groundfish fisheries in the GOA are fully utilized. In addition, the existence of latent licenses may exacerbate the disadvantages to GOA dependant CVs resulting from a lack of comprehensive rationalization in the GOA. Competition for these resources is likely to increase as a result of a number of factors, including Council actions to rationalize other fisheries, favorable current market prices and a potential for TAC changes in future years. Trawl vessel owners who have made significant investments, have long catch histories, and are dependent upon BSAI and GOA groundfish resources need protection from others who have little or no recent history and with the ability to increase their participation in the fisheries. This requires prompt action to promote stability in the trawl catcher vessel sector in the BSAI and trawl vessel sector in the GOA until comprehensive rationalization is completed.

In the Aleutian Islands, previous Congressional and Council actions reflect a policy encouraging economic development of Adak. The opportunity for non-AFA CVs to build catch history in the AI was limited until markets developed in Adak. The analysis indicates that there are only six non-AFA CV trawl AI endorsed LLPs. The Congressional action to allocate AI pollock to the Aleut Corporation for the purpose of economic development of Adak requires that 50% of the AI pollock eventually be harvested by <60' vessels. The Council action under Am. 80 to allocate a portion of AI POP and Atka mackerel to the limited access fleet does not modify AFA CV sideboard restrictions, thus participation is effectively limited to non-AFA vessels with AI CV trawl LLP endorsements. A mechanism is needed to help facilitate the development of a resident fishing fleet that can fish in both state and federal waters. The Council will consider different criteria for the CV Eligibility in the AI.

DESCRIPTION OF ALTERNATIVES

The Council approved analysis of a license-based LLP threshold eligibility for vessels meeting a minimum catch criteria of at least one landing or two landings over a qualification period. LLPs not meeting these minimum catch criteria will have endorsements in the non-qualifying management area removed of all area (BSAI and GOA) or subarea (Bering Sea, Aleutian Island, Western Gulf and Central Gulf) endorsements, depending upon the option selected by the Council. The two main participation periods selected by the Council are 2000-2005 and 1995-2005, although these are modified slightly in Component 5 to allow analysis of 2006 harvests in the Aleutian Islands management area. The analysis covers LLPs held by BSAI trawl catcher vessels and catcher processor vessels as well as LLPs held by both trawl catcher vessels and catcher processors within the GOA. The Council noted a specific request for the analysis to provide the number of LLPs for vessels under 60 feet that would be eliminated under the eligibility criteria, so that option is covered in Component 1.

Five Unique Alternative Choices:

Alternative 1 – No Action: Under this alternative the existing situation will continue. All LLPs currently issued will continue to be valid for the BSAI and GOA trawl groundfish fisheries. There would also be no change in the number of non-AFA trawl CV LLPs for the Aleutian Islands area, which could occur under Component 5.

Alternatives 2, 3, 4, and 5 are differentiated by two main factors: whether or not the program is implemented at the management area or subarea designation and secondly whether the landings history is based upon trawl groundfish landings or whether total groundfish landings, including the amount harvested by fixed gear, is included in the cumulative catch for the appropriate qualification period. The specification of these two main factors is shown for each respective alternative below:

Alternative 2 would implement LLP threshold criteria based upon BSAI and GOA management areas. It would specify application of all trawl groundfish harvests within these areas for the respective qualification period.

Alternative 3 would implement LLP threshold criteria based upon BSAI and GOA management areas. It would specify application of groundfish harvests (trawl and fixed gear) within these areas for the respective qualification period.

Alternative 4 would implement LLP threshold criteria based upon BS, AI, WG and CG subdistrict management areas. It would specify application of trawl groundfish harvests within these areas for the respective qualification period.

Alternative 5 would implement LLP threshold criteria based upon BS, AI, WG and CG subdistrict management areas. It would specify application of groundfish harvests (trawl and fixed gear) within these areas for the respective qualification period.

Component/Option Choices Common to Each Action Alternative (2-5).

Each of the four action alternatives has a common set of five components that will form the remainder of choices for this amendment. The Council can choose to include and apply any combination from these components to any one of the alternatives identified above. The respective components address the issues of qualification period; landing criterion applied to determine qualified LLPs; multiple LLPs registered to a single vessel; potential exclusion of AFA qualified vessels; potential exclusion of Amendment 80 vessels; and options for separately addressing LLPs in the Aleutian Islands groundfish fishery.

Component 1 includes a number of possible choices for landings criteria to be applied to the current LLP holders for existing trawl LLPs in the respective areas. The varying factors under Component 1 are the choice of qualification period (2000-2005 or 1995-2005); choice of threshold criteria to be applied (at least one landing for the qualification period or at least two landings for the qualification period); and a final choice to exempt vessels with an overall length less than 60 feet from application of the threshold criteria. The choices for Component 1 are as follows:

Component 1 – Option 1 requires at least one landing of groundfish during the qualification period of 2000-2005.

Component 1 – Option 1 - Suboption 1 requires at least one landing of groundfish during the qualification period of 1995-2005.

Component 1 – Option 2 requires at least two landings of groundfish during the qualification period of 2000-2005.

Component 1 – Option 2 – Suboption 1 requires at least two landings of groundfish during the qualification period of 1995-2005.

Component 1 also contains an additional choice whether or not to exclude LLPs for vessels under 60 feet overall from the landing criteria. In selecting this length exemption, the Council did not specifically identify the reasons for proposing the exemption.

As noted below:

Component 1 – Option 3 will provide an exemption for trawl LLPs in the BSAI or GOA for vessels less than 60 feet in overall length. Selection of this option can be made independent of the choice of any of the other Component 1 options.

Component 2 provides a set of choices on how to handle the instance where there are multiple LLPs registered to a single vessel, also known as ‘stacking’ of LLPs.

The Council has specified one option to deal with this situation as follows:

Component 2 – will fully credit groundfish harvest history to all stacked licenses, each carrying its own qualifying endorsements and designations.

Component 3 provides a choice of whether not to exclude AFA vessels from LLP qualification under the amendment. The Council identified a single option as follows:

Component 3 – Option 1 will preclude LLPs originally issued to vessels qualified under the AFA and LLPs used for eligibility in the AFA.

Component 4 provides a choice of whether not to exclude Amendment 80-qualified vessels from LLP qualification under the amendment. The Council identified a single option as follows:

Component 4 – Option 1 will preclude LLPs originally issued to vessels qualified under Amendment 8 and LLPs used for eligibility in Amendment 80.

Component 5 is different from other parts of the proposed amendment, in that it evaluates the effect of adding new LLPs to the Aleutians Islands trawl groundfish CV fishery, based on harvests during the respective qualification periods, 2000-2005 or 1995-2005. Harvests for the parallel waters fishery in the Aleutian Islands and also the State waters fishery (in 2006) are included in the basis for qualification, and the number of potential new LLPs that would qualify under these criteria are will be identified. The options for Component 5 are slightly different from Component 1 to provide inclusion of 2006 groundfish harvests. The options for Component 5 are:

- 1) An option for Aleutians Islands fisheries adds a new series of years to be considered, specifically 1995-2005 and 2000-2005. The new additions will allow specific determination of the effect of adding 2006 harvests to the application of threshold criteria. The revised set of options for Component 5 are as follows:

Component 5 - Option 1: requires at least one landing of groundfish during the qualification period of 2000-2006.

Component 5 – Option 1 - Suboption 1: requires at least one landing of groundfish during the qualification period of 2000-2005.

Component 5 - Option 2: requires at least one landing of groundfish during the qualification period of 1995-2006.

Component 5 – Option 2 - Suboption 1: requires at least one landing of groundfish during the qualification period of 1995-2005.

Component 5 - Option 3: requires at least two landings of groundfish during the qualification period of 2000-2006.

Component 5 – Option 3 – Suboption 1: requires at least two landings of groundfish during the qualification period of 2000-2005.

Component 5 - Option 4: requires at least two landings of groundfish during the qualification period of 2000-2006.

Component 5 – Option 4 – Suboption 1: requires at least two landings of groundfish during the qualification period of 2000-2005.

Table 1: Alternatives and Options for the BSAI Trawl CV LLP and GOA Trawl CV & CP LLP Analysis

Alternative/Element	Alternative 1 - No Action	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Change to LLP licenses being considered.	Existing situation to continue. LLPs will remain as currently configured.	Implement LLP threshold criteria based upon BSAI and GOA management areas	Implement LLP threshold criteria based upon BSAI and GOA management areas	Implement LLP threshold criteria based upon submanagement areas for the BS, AI, WG and CG.	Implement LLP threshold criteria based upon submanagement areas for the BS, AI, WG and CG.
Component 1: trawl landing requirement for trawl groundfish/all groundfish harvested	no landing requirement implemented	Trawl LLPS (BSAI CV and GOA CV and CP) – trawl landing requirement (except IFQ sablefish)	Trawl LLPS (BSAI CV and GOA CV and CP) – groundfish landing requirement (except IFQ sablefish)	Trawl LLPS (BSAI CV and GOA CV and CP) – trawl landing requirement (except IFQ sablefish)	Trawl LLPS (BSAI CV and GOA CV and CP) – groundfish landing requirement (except IFQ sablefish)
Component 1: Option 1	no landing requirement implemented	Component 1: Option 1 - at least one landing of groundfish from 2000-2005			
Component 1: Option 1 suboption 1	no landing requirement implemented	Component 1: Suboption 1 - at least one landing of groundfish from 1995-2005			
Component 1: Option 2	no landing requirement implemented	Component 1: Option 2 - at least two landings of groundfish from 2000-2005			
Component 1: Option 2 suboption 1	no landing requirement implemented	Component 1: Option 2 - Suboption 1: at least two landings of groundfish from 1995-2005			
Component 1: Option 3 exemption for vessels < 60 feet length overall	no change from status quo	Component 1: Option 3 - provide an exemption for vessels less than 60 feet from application of threshold criteria.			
Component 2: multiple LLPs on a single vessel - 'stacking' of permits	no change to LLP regulations	Catch history of a vessel accumulated while licenses are stacked on the vessel will be:	Catch history of a vessel accumulated while licenses are stacked on the vessel will be:	Catch history of a vessel accumulated while licenses are stacked on the vessel will be:	Catch history of a vessel accumulated while licenses are stacked on the vessel will be:
Component 2: Option 1	no change to LLP regulations	Component 2: Option 1 - Fully credited to all stacked licenses (with qualifying endorsements and designations)			
Component 2: Option 2	no change to LLP regulations	Component 2: Option 2 - Apportioned equally among all stacked licenses (with qualifying endorsements and designations)			
Component 2: Option 3	no change to LLP regulations	Component 2: Option 3 - Apportioned as agreed by the holders of those licenses (with qualifying endorsements and designations), unless no such agreement exists, in which case the history would be apportioned equally.			
Component 3: Option for AFA vessels	no change from status quo	AFA vessels:	AFA vessels:	AFA vessels:	AFA vessels:
Component 3: Option 1	no change from status quo	Component 3: Option 1 - Exclude LLPs originally issued to vessels qualified under the AFA and LLPs used for eligibility in the AFA			
Component 4: Option for Amendment 80 vessels	no change from status quo	Amendment 80 vessels:	Amendment 80 vessels:	Amendment 80 vessels:	Amendment 80 vessels:
Component 4: Option 1	no change from status quo	Component 4: Option 1 - Exclude LLPs originally issued to vessels qualified under Amendment 80 and LLPs used for eligibility in Amendment 80.			
Component 5: Option for Aleutian Islands Fisheries. Implement a trawl landing requirement for trawl groundfish/all groundfish harvested, including harvests in 2006	no change from status quo	Non-AFA vessels with a general CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.	Non-AFA vessels with a general CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.	Non-AFA vessels with a general CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.	Non-AFA vessels with a general CV trawl LLP, but which lack an AI endorsement may qualify for an endorsement based on deliveries in a parallel or state water fishery in the AI. Identify qualified vessels for vessels with a trawl LLP for any area based on the landing criteria within the AI.
Component 5: Option 1	no landing requirement implemented	Component 5: Option 1 - at least one landing of groundfish from 2000-2006			
Component 5: Option 1 suboption 1	no landing requirement implemented	Component 5: Suboption 1 - at least one landing of groundfish from 1995-2006			
Component 5: Option 2	no landing requirement implemented	Component 5: Option 2 - at least two landings of groundfish from 2000-2006			
Component 5: Option 2, BSAI/GOA Trawl LLP Recency	no landing requirement implemented	Component 5: Option 2 - Suboption 1: at least two landings of groundfish from 1995-2006			