

# North Pacific Fishery Management Council

Dan Hull, Chairman  
David Witherell, Executive Director



605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

Telephone (907) 271-2809

Fax (907) 271-2817

Visit our website: <http://www.npfmc.org>

November 21, 2017

Mr. Chris Oliver  
Assistant Administrator for Fisheries  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910  
Via email: CHRIS.W.OLIVER@NOAA.GOV

Dear Mr. Oliver,

I am writing to inform you of two actions the Council took in October related to the Fisheries Allocation Policy Directive. First, the Council, working closely with the NMFS Alaska Region, decided on a schedule for future allocation reviews based on the previously adopted 10-year review trigger for non-LAPP programs. This schedule is shown in the table below.

Allocation	Last Review	Next Scheduled Review
American Fisheries Act (LAPP)	2017	2024
Aleutian Islands Pollock (LAPP)	2017	2024
BSAI Crab Rationalization (LAPP)	2016	2023
Amendment 80 (LAPP)	2015	2022
Halibut / Sablefish IFQ (LAPP)	2016	2023
Central Gulf of Alaska Rockfish (LAPP)	2017	2024
GOA Pacific Cod Sector Allocation	Am 83 Implemented in 2012	2020
BSAI Pacific Cod Sector Allocation	Am 85 Implemented in 2008	2019
Halibut Catch Sharing Plan	Implemented in 2014	2021

The Council also made its first fishery allocation review pursuant to the Fisheries Allocation Review Policy Directive. This allocation review was integrated into the MSA-required review of the Central Gulf of Alaska Central Gulf of Alaska (GOA) Rockfish LAPP. Chapter 18 of the program review directly addressed the allocation review provisions. In addition, a summary of whether the program was successful in meeting the goals and objectives of the program is presented in tabular form in the Executive Summary. Based on this review, the Council concluded that the allocation review was complete and final, and that consideration of new allocation alternatives was not warranted at this time. A copy of the final document is located at the following link: [https://www.npfmc.org/wp-content/PDFdocuments/catch\\_shares/Rockfish/RockfishProgramReview1017.pdf](https://www.npfmc.org/wp-content/PDFdocuments/catch_shares/Rockfish/RockfishProgramReview1017.pdf)

The Council's Scientific and Statistical Committee raised a number of questions and concerns during its evaluation of the CGOA Rockfish Allocation Review. The SSC's discussion identified a need for clarity on the policy question that the Allocation Review is designed to address, and the standards for the analysis which the SSC was being asked to assess. For example, the SSC was unsure of the scope of the review, in that it was not clear to them the level of allocation that should be considered. More specifically, the SSC was unsure whether the policy directive required consideration of possible

reallocation of QS among participants within the rockfish program, or possible reallocation of GOA rockfish TACs across fisheries that use it -- in this case including the rockfish program, the small longline fishery, the Amendment 80 fleet, and other fisheries that have an incidental catch allowance for rockfish bycatch.

Based on the SSC's concerns about the scope and appropriate level of analysis with respect to the Allocation Review policy, the Council expressed an interest in having a representative from NMFS provide a presentation on recommended practices when reviewing allocations. Ideally, this presentation would occur when a workplan for the next allocation review is evaluated. Based on the approved allocation review schedule, an evaluation of the proposed workplan for the BSAI Pacific Cod Sector Allocation review would likely be scheduled for the latter part of 2018.

Sincerely,

A handwritten signature in black ink, appearing to read "D B Witherell".

David B. Witherell  
Executive Director

cc: Mr. Alan Risenhoover  
Mr. Glenn Merrill