

C10 GOA Trawl Bycatch Management

MOTION #1

The AP recommends the Council make the following revisions to Alternative 2:

1. Confirm staff's assumption that allocated groundfish target species taken in the Central Gulf of Alaska (CGOA or CG) may be delivered to a processing facility that is a member of a Western Gulf of Alaska (WGOA or WG) cooperative (or vice versa), as long as it is permitted with the regionalization or port of landing requirements the Council selects at final action.
2. Revise Alternative 2, Element 3b as follows:

Element 3. Allocated species (more than one option can be selected)

a. Target species:

- Option 1. Pollock (610/620/630/640) and Pacific cod (WGOA/CGOA)*
- Option 2. WGOA rockfish (northern, dusky, and Pacific ocean perch) and Western Yakutat (WY) rockfish (dusky and Pacific ocean perch)*

b. Secondary species (full retention of secondary species under Options 1 and 2 is required):

- Option 1. Sablefish (WG, CG, WY). Allocations of Central GOA sablefish under the Central GOA Rockfish Program are maintained.*
- Option 2. Thornyhead rockfish, shortraker rockfish, rougheye/blackspotted rockfish, other rockfish (WG, CG). Allocations of CG rockfish under the CG Rockfish Program are maintained.*
 - Suboption: Big skates and longnose skates*
- Option 3. (Mutually exclusive with Options 1 and 2) Cooperative measures are required to manage secondary species under maximum retainable amounts (MRAs), as opposed to cooperative allocations.*

3. Revise Alternative 2, Element 6b as follows:

Option: Each processor controls a portion of the annual PSC within a cooperative [options: 10% - 40%]. Each processor would assign the incremental PSC to vessels in the cooperative under the terms of the cooperative agreement. PSC made available by these agreements cannot be used by vessels owned by the processor (**i.e., a processor can provide PSC quota available by these agreements to a vessel if it has no more than a 10% ownership stake in that vessel** ~~a vessel with more than 10% ownership by a processor using individual and collective rules for determining ownership~~).

4. Insert the following language under Alternative 2, Element 6d, to accommodate stacked licenses:

For the purposes of initial cooperative formation, in situations in which eligible catch history is derived from multiple licenses used on one vessel, allow owners to choose to 1) belong to more than one cooperative in the same area if the majority of eligible catch history on each license was delivered to different processors; 2) belong to one cooperative to which the majority of one of their license's eligible catch history was delivered.

5. Add an option under Alternative 2, Element 8a: **Option: Use caps do not apply to the catcher vessel WG and WY rockfish fisheries, if any WG or WY rockfish species are allocated to the catcher vessel sector under the program.**

The AP also recommends the following revisions/additions to the analysis:

1. The analysis in Tables 1-76 and 1-78 (p. 113-115) incorrectly interprets the current Council motion relative to harvest use (ownership) caps under Alt 2, Element 8. The analysis should be revised to reflect the current motion which states that allocated target species caps are applied at the WG and CG/WY levels (e.g. not separate pollock caps for 610, 620, 630, 640).
2. Continue to bring forward in the analysis the list of potential reporting elements outlined on p. 179 for future Council selection and add two requirements to the list: (1) *description of inter-and intra-cooperative leases by cooperative members*; and (2) *a description of incentives to increase landings of under-utilized flatfish species*.
3. Section 1.4.1.2.3 (Secondary Species under Alternative 2) needs to be more comprehensive to include:
 - Description of how/whether the co-op management system provides effective management tools for high value MRA secondary species.
 - Description of the potential conflict with MRA management versus bycatch management objectives, in terms of PSC use and groundfish discards.
 - A table that shows the bycatch/PSC status of these secondary species.
 - Data that show total catch (mt) of secondary species by gear type and operational mode for the most current eligibility years (2008 – 2012) and through 2015.
 - Report same information as above, but using retained catch.
4. The analysis should include a broader range of years than 2013 – 2015 to represent status quo average halibut PSC use, against which the analysis evaluates impacts to harvesters and processors of further PSC reduction options.
5. The analysis should provide data on GOA groundfish dependency for the CV (by AFA and non-AFA) and CP sectors.
6. Include data (heat map) to indicate trawl LLP activity in the GOA, by year, 2003 through 2015.

Motion passed 16-3.

Rationale in Favor:

- The bold and underlined revisions to Alternative 2 are in response to staff questions presented in the analytical document. The additional six items are those that the industry would like to see in the next iteration of the document to help inform better decision-making. It is critical for this document to continue moving forward through the analytical process.
- Alternative 2 is the only alternative that has something to benefit all sectors in the Gulf of Alaska — processors, groundfish harvesters, the waterfront workforce, the community, as well as directed salmon and halibut IFQ fishermen. Alternative 2 is the only alternative that adequately meets the Council's Purpose and Need Statement and multiple goals and objectives.
- Alternative 2, with its multiple options, is a direct reflection of the many lessons learned from some of the undesirable outcomes experienced in previous rationalization programs. In this way, Alternative 2 is a proactive approach to minimizing any potential negative outcomes from this new management regime.
- Under status quo, without the proper tools, the GOA groundfish trawl industry will continue to operate in an inefficient and dysfunctional manner. The recent reduction to halibut and Chinook

salmon PSC will continue to result in detrimental effects as happened in 2016 when the industry lost 120 days of fishing. It is unfair to continually criticize the groundfish trawl industry for these types of results when they are repeatedly and persistently asking for the tools to help them avoid such unfortunate scenarios, while simultaneously increasing the value of their fishery.

Rationale Opposed:

- Privatization of the fishery or allocating quota for a virtually unlimited duration is not the only answer to bycatch management. Based on passed rationalization experiences, it is anticipated that a catch share program like the one proposed in Alternative 2 will harm communities and potentially prohibit new entrants, including future fishermen and processors.
- Alternative 2 will promote concentrations of economic power and control in the GOA groundfish processing and harvesting sectors, which will impair competition and artificially limit the effectiveness of private enterprise to provide favorable opportunities for employment, labor and capital, and the equitable distribution of income, earnings and opportunity in the very economically thin economies of GOA Alaska coastal communities.

MOTION #2

The AP recommends the Council remove Alternative 3 from analysis for no further action.

Motion passed 14-5.

Rationale in Favor:

- The analysis clearly shows that Alternative 3 does not work to meet the Council's Purpose and Need Statement and goals and objectives. Under this Alternative, the only way to control and reduce PSC is to lower the cap. The GOA groundfish industry is already suffering economically with the last PSC reductions implemented, which would be further exacerbated under this approach.
- While there were comments that addressed general elements of Alternative 3, there were no comments that specifically supported Alternative 3 (or a bycatch management program that allocates only PSC) as a viable management option. Any bycatch management program that allocates only PSC would not end the race for fish nor would it promote individual accountability for PSC reduction.

Rationale Opposed:

- It is not appropriate to remove any of alternatives at this stage of the analysis. It is important to include as many Alternatives as possible in the analysis to address the challenges in the GOA groundfish fisheries that have been identified as needing Council action.
- The recent Council review of the BSAI crab rationalization program clearly demonstrates that it is very important to clearly and thoroughly understand in advance the economic and social dislocation, and the artificial and significant limitations on economic diversity, employment and business opportunities, that may result from the privatization of the GOA groundfish resources.
- The recent Council review of both the Halibut IFQ and BSAI crab rationalization programs demonstrates that there is little opportunity, interest, potential, or ability to address the negative nature of those social and economic impacts that may have been inadvertently or poorly-anticipated when the multitude of regulatory and economic reviews and analyses were originally conducted prior to Council approval and federal implementation of these programs.