



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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Action Memo

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Agenda Date12/6/2016

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Dan Hull, Chairman
Chris Oliver, Executive Director

SUBJECT:

GOA Trawl Bycatch Management - Preliminary analysis

STAFF CONTACT: Sam Cunningham

ACTION REQUIRED:

Review staff papers and EIS Scoping Report

BACKGROUND:

Since 2012, the Council has been engaged in the development of a revised management structure for the Gulf of Alaska (GOA) groundfish trawl fisheries. The motivation for this action is to provide the fleet with a structure under which it can minimize prohibited species catch (PSC), better utilize the allowed amount of PSC to harvest more groundfish, create additional value from the resource, and provide stability for dependent GOA fishing communities. The Council first established a Purpose & Need Statement and a list of program Goals & Objectives in October 2012. The Goals & Objectives were most recently revised in June 2016 with the addition of an "overarching objective," which cites a desire to minimize economic barriers for new participants by limiting harvest privileges that may be allocated (Section 1.1.4).

The Council currently has four alternatives on which to base a preferred policy recommendation. Alternative 1 is a 'no action' alternative, which would retain the existing management structure of the fishery under the License Limitation Program ("limited access"). Alternative 2 defines a catch share program wherein groundfish harvest and PSC use privileges are allocated to voluntary cooperatives based upon the fishing history associated with the Federal License Limitation Program licenses that are enrolled in each cooperative. The specified elements include measures that are intended to promote stability in trawl-dependent fishing communities (consolidation limits, quota regionalization, and active participation requirements). Alternative 3 (added in October 2015) defines a program wherein PSC limits are set for voluntary cooperatives and, potentially, a limited access fishery but groundfish quotas are not allocated. PSC would be allocated on the basis of vessels as opposed to licenses, and could be allocated according to a combination of metrics that includes 'equal shares,' recent dependency on the GOA trawl fishery, and participation in cooperative agreements. Additional elements limit consolidation through transfer restrictions, and direct cooperatives to develop contract terms that promote active participation. Both Alternatives 2 and 3 include elements that require 100% observer coverage and that would revise pollock seasonal harvest apportionments and season dates for pollock and Pacific cod. Alternative 4 could only be selected in combination with Alternative 2; it includes two options for a program element that could provide additional community protections (Community Fisheries Associations (CFA) or Adaptive Management Program).

The documents provided for this agenda item represent a bridge between a series of staff discussion papers dating back to 2013 and the complete Environmental Impact Statement (EIS) that would be required before the Council could take action on a recommendation. To this point, discussion papers have provided context

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and background on specific issues related to the action at hand, and have focused on aiding the Council in refining its alternatives so that they are consistent with stated intents and can eventually be formulated into regulations. By contrast, this set of documents begins to look at the relative impacts of selecting one or more of the action alternatives. These documents do not exhaust the full range of impacts that should be considered at the time of action; rather, they represent progress towards a complete EIS should the Council choose to move forward at this time.

NPFMC and NMFS staff have provided three primary documents to support this agenda item:

1. Preliminary Economic Analysis - Document in the form of an in-progress Regulatory Impact Review (RIR) that includes: background on the affected fisheries and markets; analysis of allocations, excessive share limits, and PSC limit reductions; and discussion of impacts on harvesters, processors, tender operators, captains/crew, and new entrants. Staff has also posted an **errata** addendum that adds to the discussion provided on coordination of fishery management in State of Alaska waters (Section 1.3.7). That addendum discusses management strategies that do not presume the creation of additional State-managed pollock fisheries under guideline harvest levels (GHL), which are not currently under consideration by the Board of Fisheries.
2. Preliminary Social Impact Assessment (SIA) - An SIA is a required component of a complete EIS. This document provides contextual information on the individuals, businesses, and communities that directly participate in the GOA groundfish trawl fishery. The preliminary document begins to consider relative impacts across different stakeholder groups and communities.
3. EIS Scoping Report - NMFS staff has provided a summary report on stakeholder comment letters that were submitted in response to the Notice of Intent (NOI) to prepare an EIS, which was published in the Federal Register on July 28, 2016 (FR 49614). NMFS has provided that FR notice as a separate attachment under this agenda item, as well as an attachment that contains the comment letters in full.

Other attachments:

- The Council's current Purpose & Need Statement, Goals & Objectives, and Alternatives as amended in June 2016.
- A table that compares the four alternatives, organized by category of program element.