

***PRELIMINARY  
DRAFT & OUTLINE***

**PACIFIC COAST GROUND FISH LIMITED  
ENTRY FIXED GEAR SABLEFISH PERMIT  
STACKING PROGRAM REVIEW**

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## LIST OF ACRONYMS AND ABBREVIATIONS

ACL	Annual catch limit
AKFIN	Alaska Fisheries Information Network. Provides commercial fishery data for Alaska fisheries.
Council	Pacific Fishery Management Council
DTL	Daily trip limit
FMP	Fishery management plan
IFQ	Individual fishing quota
IQ	Individual quota
LAP	Limited access privilege
LAPP	Limited access privilege program
LEFG	Limited entry fixed gear
MSA	Magnuson-Stevens Fishery Conservation and Management Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NS	National Standard
PacFIN	Pacific Coast Fisheries Information Network. Provides commercial fishery data for Washington, Oregon, and California (maintained by the Pacific States Marine Fisheries Commission)

## **1.0 INTRODUCTION**

This review document concerns implementation of Amendment 14 to the Pacific Coast Groundfish Fishery Management Plan (FMP). Amendment 14 (PFMC, 2001) was approved by the Pacific Fishery Management Council (Council) at its November 2000 meeting and partially implemented by National Marine Fisheries Service (NMFS) on August 2, 2001 (Federal Register, 2001) (66 FR 41152, August 7, 2001), in time to provide for a limited entry fixed gear (LEFG) sablefish season from August 15 through October 31. The amendment was fully implemented for the 2002 fishery. This amendment created a permit stacking program for limited entry permit holders with sablefish endorsements (i.e., the sablefish permit stacking program or simply the sablefish program). The program was expected to lengthen the duration of the limited entry, fixed gear primary sablefish fishery, increase safety and flexibility for fishery participants, and reduce capacity in the limited entry, fixed gear fleet.

### **1.1 Purpose and Need for a Program Review**

The purpose of this document is to provide an overall review of the sablefish program to determine how well it has met its FMP goals and objectives, and to help identify any potential modifications or improvements to the program which would then be considered through the Council's standard notice and review process. The goals and objectives of the program are based on, and are consistent with the goals and objectives of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) which is the ultimate authority for regional council fishery management.

While the sablefish program seems to have been generally successful at achieving its main objectives, a few limited requests for program modifications have emerged in the more than twelve years that have elapsed since its implementation (see Section 1.2). During that time there have been several changes in the fishery and groundfish management. In consideration of the changes and time elapsed, the Council and NMFS have agreed upon the need to review the program with a more in-depth look to determine how well it has met its original objectives and how well it continues to serve Pacific Coast groundfish management and its stakeholders. In addition, the sablefish permit stacking program is of a type of fishery management program that was categorized in the 2006 reauthorization of the MSA as a limited access privilege (LAP) program. After 2006, any programs initiated as LAP programs had to meet certain requirements listed in Section 303A(c) of the MSA, including the need to be reviewed on a periodic basis. While it was initiated as a LAP program prior to the MSA requirements for new LAP programs, a periodic review of any program to determine how well it is working and achieving its original objectives is a prudent management process and is consistent with the requirements in §303A of the MSA.

## **1.2 Concurrent Considerations of the Sablefish Program**

Separate from this review, the Council is currently considering three potential modifications to the regulations implementing the sablefish program (Sablefish Program Phase I Review). The modifications under consideration are: 1) liberalizing the own-and-hold threshold which currently specifies that partial ownership of any permit, no matter how small, counts toward the limit of no more than three per vessel, 2) requiring the use of electronic fish tickets to aid in the tracking of landings, and 3) allowing a limited entry fixed gear endorsed permit and a trawl endorsed permit to be registered to the same vessel at the same time.<sup>1</sup> A final Council decision on these three potential changes to the sablefish program is scheduled for the June 2014 Council meeting.

## **2.0 BACKGROUND**

### **2.1 Pre-Permit Stacking Management History**

Sablefish (*Anoplopoma fimbria*), also known as “black cod,” is one of the most valuable species in the groundfish fishery off Washington, Oregon, and California. Because of its high ex-vessel value per pound, sablefish is a desirable target species for many West Coast fisheries and gear groups. The Council made several sablefish allocation decisions over the 15 years prior to implementation of Amendment 14 in an attempt to divide this desirable resource among different sectors of the fishery in an equitable and beneficial way.

In 1987, an allocation of sablefish was established that provided 52 percent to the trawl fishery and 48 percent to the non-trawl gear groups. This allocation was later adjusted to 58 percent and 42 percent. Industry representatives of vessels participating in the non-trawl sablefish fisheries expressed their desire that the fishery be managed on a seasonal basis (as opposed to the year-round policy the Council pursued for most sectors of the groundfish fishery). The pursuit of seasonal management for the non-trawl segment of the sablefish fishery was a key decision that, when combined with a decline in sablefish abundance, ultimately impacted safety, efficiency, and allocation issues that the permit stacking program was meant to address.

The vast majority of the trawl and non-trawl sablefish harvest was placed under a license limitation program in 1994 under Amendment 6 (PFMC, 1992). Of the non-tribal commercial optimum yield of sablefish, 90.6 percent was allocated to the limited entry fishery and 9.4 percent was allocated to the open access fishery. The limited entry sablefish allocation was then

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<sup>1</sup> In trailing actions for the trawl individual fishing quotas (IFQ) program (trawl rationalization) the Council has previously approved the allowance for a fixed gear and trawl permit to be registered to the same vessel. NMFS is in the process of considering implementation of that action.]



allocated 58 percent to the limited entry trawl sector and 42 percent to the limited entry non-trawl (fixed gear) sector.

Management for the fixed gear fleet was, and continues to be divided at 36° N. latitude (approximately 20 miles south of Point Sur, California) with separate annual catch limits (ACLs) for the northern and southern fisheries divided by this line. While the coastwide trawl fishery took sablefish as part of its year-round cumulative trip limit fisheries, the northern fixed gear fleet landed 85 percent of its allocation in a directed sablefish season, and 15 percent of its allocation in daily trip limit (DTL) fisheries. The southern fixed gear fleet landed all of its allowed harvest in DTL fisheries. The directed season north of 36° N. latitude had become increasingly tense over the years as vessel capacity and competition for landings increased and amounts of fish available for harvest decreased. Through 1996, the directed (or “primary”) season was managed as an open competition derby. Derby duration shortened each year, until the fishery was just five days long in 1996.

Concern for the safety of participants in the sablefish derby led the Council to develop Amendment 9 to the FMP. In 1997, NMFS implemented Amendment 9, the sablefish endorsement program (PFMC, 1996). Under this program, the limited entry permit holders were eligible for sablefish endorsements based on their permit history. Permits without sufficient sablefish landings history were not endorsed for future participation in the primary season, but could still be used in the DTL fisheries.

Even with the sablefish endorsement, the fishery season remained short (nine days in 1997). In order to lengthen the season, equal limits were imposed on all qualified participants (sablefish endorsement holders). However, the season still had to be limited to keep the fishery from being classified as an individual quota (IQ) program. A fishery with a limited class of participants each with an amount of fish they are allowed to harvest is an IQ. In its 1996 re-authorization of the MSA, Congress had included a moratorium on implementing new IQ programs through October 1, 2000. The moratorium was interpreted to cover any program that would allow a vessel ample time and opportunity to catch a limit allocated specifically to that vessel. The moratorium forced the Council to manage the primary season for a short duration that prevented many participants from fully taking their vessel-specific limits (a “modified derby”). To further assure that the cumulative limits would not be categorized as an IQ program, regulations were established to set a maximum season length of 10 days. Equal cumulative limits were viewed by the Council as being extraordinarily reallocative in nature, but for 1997, equal limits were the only option available to lengthen the season and to begin to address safety issues.

The inequitable allocation system created by the equal cumulative limits was partially resolved with a “three-tier” system, which was established by regulatory amendment for 1998 and beyond. Under this “three-tier” system, sablefish endorsement holders were ranked into three different tiers based on their permit histories, with the lowest tier (Tier 3) having the lowest qualification requirements. Annual management of the three-tier cumulative limit system

required that the allocation for this fishery be divided such that there were three different cumulative limits for the different tiers. While somewhat more equitable than the cumulative limit program, the three-tier system still required some fishermen to make large cutbacks in their harvest levels while allowing others to expand. The system provided little flexibility to operators to determine the manner in which their sablefish catch is harvested or to scale their harvest upward to match their pre-existing levels of capital investment. This lack of flexibility undoubtedly reduced efficiency, resulting in a lower net value for harvest.

Even under the three-tier system, the fishery still had to be managed as a modified derby, and the seasons were still too short (between 6-9 days) to allow fishermen to operate with care and safety. Short derby seasons are believed to result in accidents due to fatigue and financial pressure to fish and transit under unsafe conditions.

The MSA moratorium on new IQ programs expired on October 1, 2000. On December 21, 2000, Public Law 106-553, an appropriations bill for the National Oceanic and Atmospheric Administration (NOAA), contained a continuation of the IQ moratorium through October 1, 2002 and an exception to that moratorium for a permit stacking program in the West Coast fixed gear sablefish fishery. On August 2, 2001, Amendment 14 implemented a permit stacking program, in which up to three sablefish-endorsed permits could be registered for use with a single vessel and that vessel could then have access to the primary season sablefish cumulative limits associated with each of those permits. Most importantly, the exception to the IQ moratorium for the fixed gear sablefish fishery as implemented through Amendment 14 allowed longer seasons (April through October), so that each vessel could fish against its limits at its own speed.

Portions of Amendment 14 were implemented for the 2001 primary sablefish season. The extended sablefish season (April 1 through October 21) was fully implemented in 2002. In 2006, NMFS implemented additional regulations for Amendment 14. In the future, NMFS will consider implementing a permit stacking program fee system as required by the MSA (see Section 3.11). Table 2-1 recounts the implementation history.

Table 2-1. Implementation of Amendment 14.

Date	Action	Reference
08/02/2001	NMFS final rule implementing initial permit stacking provisions as follows: <ol style="list-style-type: none"> <li>1) up to 3 sablefish-endorsed permits per vessel;</li> <li>2) limited entry, primary sablefish season of August 15 - October 31;</li> <li>3) a vessel may fish for sablefish in the primary season with any of the gears specified on at least one of the limited entry sablefish-endorsed permits registered for use with that vessel;</li> <li>4) no person may own or hold more than 3 sablefish-</li> </ol>	66 FR 41152, August 7, 2001

Date	Action	Reference
	<p>endorsed limited entry permits unless that person owned more than 3 permits as of November 1, 2000;</p> <p>5) no partnership or corporation may own a sablefish-endorsed limited entry permit unless that partnership or corporation owned a permit as of November 1, 2000;</p> <p>6) cumulative limits for species other than sablefish and for the sablefish daily trip limit (DTL) fishery remain per vessel limits and are not affected by permit stacking; and</p> <p>7) the limited entry DTL fishery for sablefish is open during the primary season for vessels not participating in the primary season.</p>	
03/01/2002	As part of the final rule implementing the 2002 groundfish regulations, the primary limited entry sablefish season was extended to April 1 – October 31.	67 FR 10490, March 7, 2002
04/03/2006	<p>Final rule including additional permit stacking regulations as follows:</p> <p>1) permit owners and permit holders required to document their permit ownership interests to ensure that no person holds or has ownership interest in more than 3 permits;</p> <p>2) owner-on-board requirement for permit owners who did not own sablefish-endorsed permits as of November 1, 2000;</p> <p>3) an opportunity for permit owners to add a spouse as co-owner;</p> <p>4) vessels not meeting minimum frozen sablefish historic landing requirements are not allowed to process sablefish at sea;</p> <p>5) permit transferors required to certify sablefish landings during mid-season transfers; and</p> <p>6) a definition of the term “base permit.”</p>	71 FR 10614, March 2, 2006

## 2.2 Permit Stacking Program Goals and Objectives

The legal basis for Amendment 14 is the Groundfish FMP approved by the Secretary of Commerce under the authority provided by the MSA.

Permit stacking and its accompanying regulatory provisions were expected to help the Council address objectives related to National Standards 4 (fair and equitable allocation), 5 (consider efficiency), 6 (take into account variations and contingencies), 8 (take communities into account), 9 (minimize bycatch and bycatch mortality), and 10 (promote safety). Specifically, it

was expected to affect achievement of Groundfish FMP Goals 2 (maximize the value of the resource as a whole) and 3 (achieve maximum biological yield) through impacts related to Objectives 6 (achieve greatest net benefit), 9 (reduce wastage), 11 (minimize bycatch), 12 (equitable sharing of the conservation burden), 13 (minimize gear conflicts), and 14 (accomplish changes with minimum disruption).

Key objectives of Amendment 14 and the permit stacking program were further defined as provided in Table 2-2.

The stacking program was intended to modify the economic and social impacts of the fishery management system in order to attain a more favorable result with respect to the entire suite of standards, goals, and objectives for management of the groundfish fishery.

Table 2-2. Key objectives of the permit stacking program and consistency with management objectives.

<b>Key Objective</b>	<b>Consistency with Management Objectives of the FMP and MSA</b>
1. Rationalize the fleet and promote efficiency	Capacity reduction is one of the key elements of the Council’s strategic plan. The strategic plan generally approaches capacity reduction by reducing the number of fishing vessels. This reduction does not of itself imply the rationalization of the fleet or increased efficiency. It is possible that the most efficient fixed gear sablefish harvest could involve a greater number of vessels taking sablefish as bycatch in other fisheries. However, given the high degree of overcapitalization in the fishery, it is believed that a reduction in capacity will generally move the fishery toward greater efficiency, addressing National Standard (NS) 5 and FMP Objective 6 on net national benefits.
2. Maintain or direct benefits toward fishing communities	This objective relates to NS 8 on fishing communities and FMP Objective 16 on fishing communities.
3. Prevent excessive concentration of harvest privileges	This objective relates to NS 4 on allocation, NS 8 on fishing communities, and FMP Objective 15 on avoiding adverse impacts to small entities.
4. Mitigate the reallocational effects of recent policies (3-tier system and equal limits)	This objective relates to NS 4 on allocation and FMP Objectives 12 on equitable allocation and 14 on minimizing disruption.
5. Promote equity	This objective relates to NS 4 on allocation and FMP Objective 12 on equitable sharing.
6. Resolve or prevent new allocation issues from arising	This objective relates to NS 4 on allocation and FMP Objectives 12 on equitable sharing and 14 on minimizing disruption.
7. Promote safety	This objective relates to NS 10 and FMP Objective 17 on safety.
8. Improve product quality and value	This objective relates to NS 5 on efficiency and FMP Objective 6 on net national benefits.
9. Take action without creating substantial new disruptive	This objective relates to FMP Objective 14 on minimizing disruption.

Key Objective	Consistency with Management Objectives of the FMP and MSA
effects.	
10. Create a program that will readily transition to a multi-month IQ program.	This objective relates to capacity reduction recommendations in the strategic plan. Where individual quotas are transferable and divisible they address NS 6 by providing the fleet with substantial flexibility to respond to changing conditions in the fishery and NS 5 by taking efficiency into account. FMP Objective 6 is also addressed.

### 2.3 Description of the Current Permit Stacking Program

The current permit stacking program, or sablefish primary fishery, occurs north of 36° N. latitude where vessels registered to at least one limited entry permit, with either a gear endorsement for longline or trap (or pot) gear, and an endorsement for sablefish, fish a specified tier limit. Such vessels are eligible to fish in the DTL fishery before the primary season (i.e., January through March) and after their aggregate tier limit on the vessel has been harvested, or the season has ended, whichever comes first. This transition between fisheries often occurs during the sablefish primary season. Under the permit stacking program, each fixed gear sablefish endorsed limited entry permit is assigned to one of three tiers. The permit’s tier level determines the poundage of sablefish which can be landed by that permit each season while participating in the primary sablefish fishery. For sablefish endorsed, limited entry permits, the Regional Administrator will biennially or annually announce the size of the cumulative trip limit for each of the three tiers associated with the sablefish endorsement such that the ratio of limits between the tiers is approximately 1:1.75:3.85 for Tier 3:Tier 2:Tier 1, respectively. Up to three permits can be stacked onto a single vessel, allowing that vessel to land up to the sum of the three tier limits in aggregate.

The program also includes other provisions, including a prohibition on the ownership of permits by corporations or other business entities, a permit owner-on-board requirement, a limit on the number of permits any individual or entity (individually and collectively) can own or hold, and a prohibition on at-sea processing. A grandfather clause was provided for each of these provisions, allowing the continuation of situations in place prior to Council action. For non-grandfathered permits, the owner of the permit must be on board the vessel during the primary season when that permit’s tier amount is being fished. If landings from a trip will be attributed to multiple tiers, then all permit owners of those tiered permits being fished must be onboard. However, there are medical and death exemptions from this requirement.

Currently there are 164 sablefish endorsed permits of which 131 are endorsed for longline only; 27 are trap/pot endorsed only, and 6 have two gear endorsements. The number of permits by tier levels is as follows: Tier 1 – 28 permits; Tier 2 – 42 permits, and Tier 3 – 94 permits. As of August 2013, approximately 40 vessels have stacked permits.

## **2.4 Relevant Groundfish Policy and Regulatory Changes Since Program Implementation**

Since the implementation of the fixed gear sablefish permit stacking program, numerous regulatory changes have taken place within the Pacific Coast groundfish fishery. Chief among these changes was implementation of groundfish conservation areas (i.e., ecologically important habitat closed areas and rockfish conservation areas) and the rationalization of the trawl fishery. The large number of transfers occurring between the limited entry fixed gear (LEFG) sablefish fishery and the rationalized trawl fishery make the development of the rationalized trawl fishery especially important in reviewing the sablefish program.

Trawl rationalization involved two closely related and interlinked decisions. The first was the specification of the management system used to rationalize the trawl fishery in Amendment 20 to the groundfish FMP (PFMC and NMFS, 2010). Amendment 20 involved the consideration of harvest control tools such as individual fishing quotas (IFQs) and harvester co-ops. The second decision involved determining the proportion of the available catch that would be allocated to the trawl versus the non-trawl fishery. This decision was addressed as Amendment 21 to the Groundfish FMP (PFMC, 2010).

## **3.0 PROGRAM PERFORMANCE AND REVIEW**

This review of the fixed gear LAPP will concentrate on assessing achievement of the 10 key objectives of the sablefish program (Sections 3.1 through 3.10) as provided in Groundfish Amendment 14 and summarized in Table 2-2 of this document. These objectives are all socio-economic objectives. While the biological impacts of the sablefish permit stacking program have not been quantified, they are believed to be insignificant. The impacts, if any, would result from a potential increase in unreported discards of smaller sablefish and changes in retention of other groundfish species. An increase in discard of small sized sablefish (high grading) might be expected because the permit tier limits are landing limits rather than catch limits which would limit both catch and discards. The degree of high grading will be a function of the price differential between large and small fish, catch composition by size class, and fishing costs. There is no reliable data on size composition of landings because different buyers use different size categories. The ending of the derby fishery constraint may have allowed vessels to increase their retention of other groundfish or may have had no effect. Under current management, the conservation of sablefish and other groundfish is protected by annual catch limits (ACLs) which are independent of the permit stacking program.

This is the first official review of the impacts and outcome of this program by the Council. In 2013, NOAA published a technical memorandum on the performance of U.S. catch share programs (Brinson, Ayeisha A. and Thunberg, Eric A., 2013) which included a review of the Pacific Coast sablefish fishery. The authors of that report found evidence for capacity reduction

in the fishery as well as better achievement of the catch quota. Total revenue (adjusted for inflation) also increased, however they were not able to determine what part of the change might be due to the program versus other market forces.

This review will utilize primarily available PacFIN landings data and AKFIN vessel participation indicators (“yes/no” flags), and U.S. Coast Guard records on safety incidents to look at how the program has met its objectives.

The assessment of each objective of the program, as identified above, follows in sections 3.1 through 3.10 below.

## **3.1 Rationalize the Fleet and Promote Efficiency**

### ***3.1.1 Background***

Rationalizing the fleet and promoting efficiency, primarily through reducing the number of participating vessels (capacity reduction) and lengthening the season, was a key objective of Amendment 14. In considering how to reduce the fleet, the Council also had to balance that reduction with its other objective of preventing excessive concentration of harvest privileges (see also Section 3.3). At the time Amendment 14 was adopted, the Council had just completed the Groundfish Strategic Plan (PFMC, 2000) for which capacity reduction is one of the goals. In support of the Council’s Strategic Plan development process, the Scientific and Statistical Committee (SSC) assessed the capital utilization rates in year 2000 groundfish fisheries. The SSC characterized the capital utilization rate for a fishery as “the percentage of boats in the [year 2000] fleet needed to harvest the groundfish available in 2000.” For the limited entry fixed gear sablefish fishery, the SSC calculated that just 9 percent of the vessels in that fleet in 2000 were capable of harvesting that fleet’s sablefish allocation for that year. While the Council was not interested in reducing the number of vessels participating in the limited entry fixed gear sablefish fleet to 9 percent of the year 2000 levels, capacity reduction was a significant objective for Amendment 14 and the permit stacking program.

Amendment 14 was designed to allow the fleet to achieve some balance between too little and too much capacity reduction, without specific criteria for what constituted “too little” or “too much.” Too little capacity reduction could mean that commercial fishermen intending to make a career of fishing would have to rely on sablefish landings providing a smaller proportion of their incomes and have to rely more on other fisheries. Too much capacity reduction could mean that the fleet could be reduced and concentrated to such a small number of vessels that harvest benefits from the fishery would be channeled to relatively few individuals, coastal communities, and processors.

Amendment 14 was explicitly *not* designed to reduce the fleet numbers to as few vessels as possible. The Council’s judgment on whether the fleet’s capacity has been reduced by too much or by too little, and whether excessive concentration of harvest privileges has occurred, will be

necessarily qualitative, since the Council did not set an explicit capacity reduction goal with Amendment 14.

Information and data for considering whether the fleet has been rationalized and made more efficient include assessing the following:

- Changes in season length and average fishing days by year;
- Changes in the concentration of harvest, including combinations of stacked permits, landings, and revenue by vessels in the fishery, both before and after program implementation; and
- Changes in permit prices for available years.

### **3.1.2 Assessment**

The sablefish program provided an immediate and significant lengthening of the primary sablefish fishery and average duration of the time over which a vessel might fish. Table 3-1 provides a succinct display of the season length and management history. In 1996 the primary fishery lasted only 5 days (September 1-6) in the derby mode. Beginning with 2002, the annual primary sablefish season was increased to 7 months in length (April 1 through October 31), giving fishermen and processors far more flexibility in how and when they fished and made landings. Figure 3-1 displays the average duration in days over which a vessel was fished per year in the primary sablefish fishery (calendar days from a vessel's first until its last landing made as part of the primary sablefish fishery). Looked upon in that way, within the 7 months of fishing opportunity, individual vessels tailored seasons for themselves that ranged on average from 60 to 75 days.

With regard to reducing the capacity of the fishery, Figure 3-2 displays the number of vessels participating in the sablefish fishery prior to and following implementation of the sablefish tier program. Primary season participation from 1998 through 2000 (prior to the program) averaged 135 vessels compared to an average of 90 vessels after program implementation (2002 through 2013), a 33 percent decrease. The number of vessels and landings in the primary season fishery prior to 1998 were not separated from the total fishery and are not directly comparable to the post program numbers. ***Primary-season-only values for 1996 and 1998 will be provided in the next draft of this document.***

With regard to any changes in the ability of the fishery to achieve its allocation, Figure 3-3 displays the primary LEFG sablefish fishery allocation and landings from 1998 through 2012. Comparing preprogram (1998 and 2000) with post program (2002 through 2012) landings indicates a significantly closer achievement of the allocation post program. The average percent of the sablefish primary season allocation that was harvested after implementation of the program (2002 through 2012), on either an unweighted or weighted basis, indicates a 90 percent utilization rate of the allocation during this time with a relatively small variation and no obvious upward or downward trend (Figure 3-4). This compares to an unweighted average utilization for



the years 1998 and 2000 of 65 percent and a much larger variation between the two years than between any of the post program years. Some of the shortfall in the two preprogram years was made up in a mop-up fishery. *Information on the mop-up fishery will be included in the next draft of this document.*

Table 3-1. Season length and management summary for the primary LEFG sablefish season north of 36° N. latitude, 1992 through the present.

Year	Season Length	Management
1992-1994	2 to 3 weeks	Derby
1995	7 days	Derby
1996	5 days	Derby
1997	9 days	Equal Limits/Modified Derby
1998	6 days	Tiered Limits/Modified Derby
1999	9 days	Tiered Limits/Modified Derby
2000	9 days	Tiered Limits/Modified Derby
2001	Aug. 15 - Oct. 31	Aug. 2 implementation of Permit Stacking
2002-present	Apr. 1 - Oct. 31	Permit Stacking

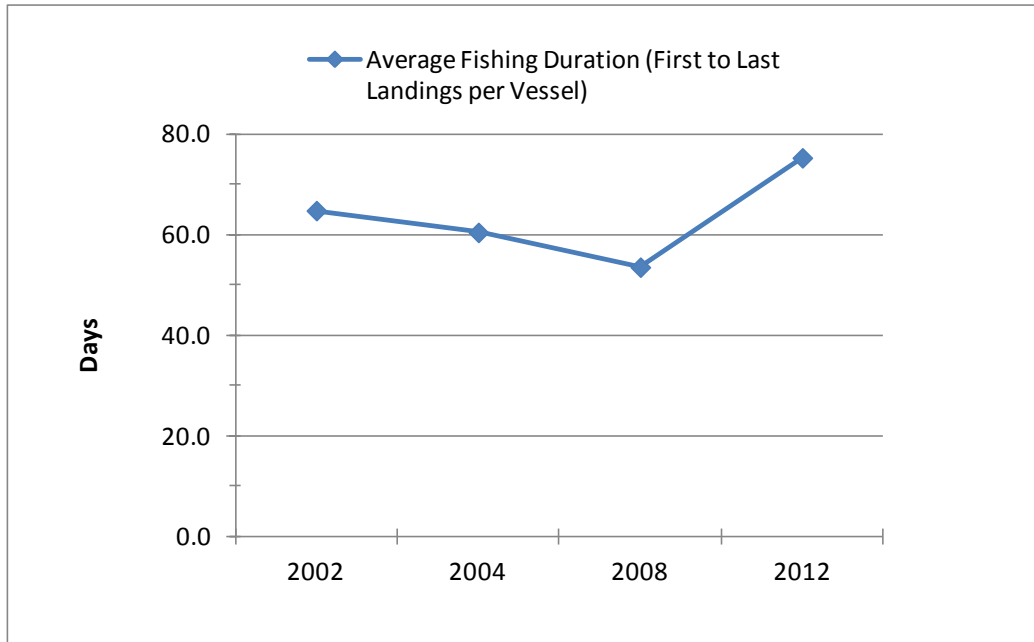


Figure 3-1. Average duration in days from first to last day of landings for vessels participating in the primary sablefish fishery (2002, 2004, 2008, and 2012).

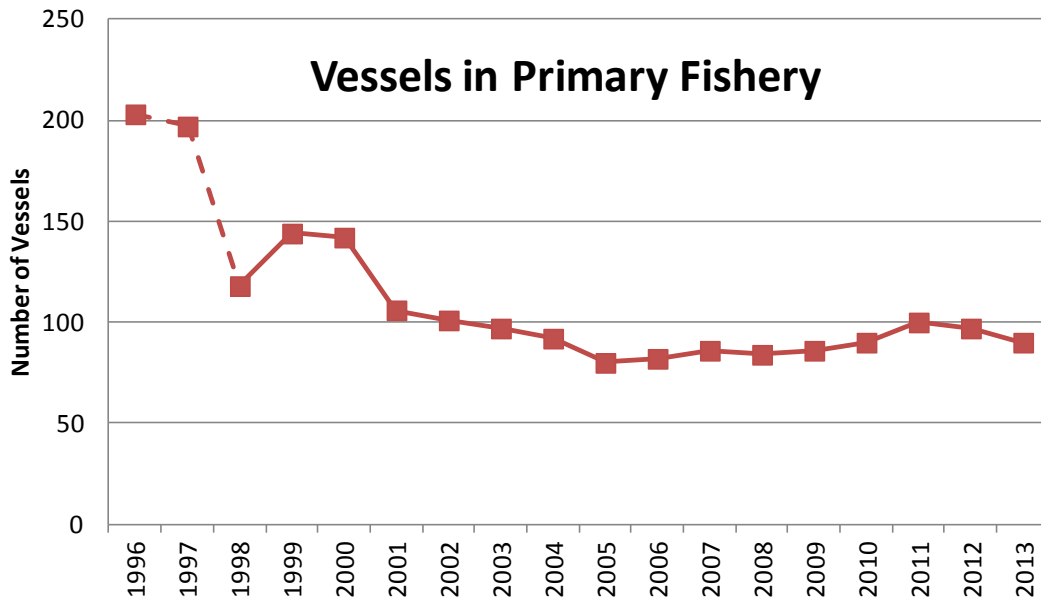


Figure 3-2. Number of vessels participating in the LEFG primary sablefish fishery from 1998 to 2013. Prior to 1998 the numbers represent total vessels as no breakdown between the primary season and other landings was available.

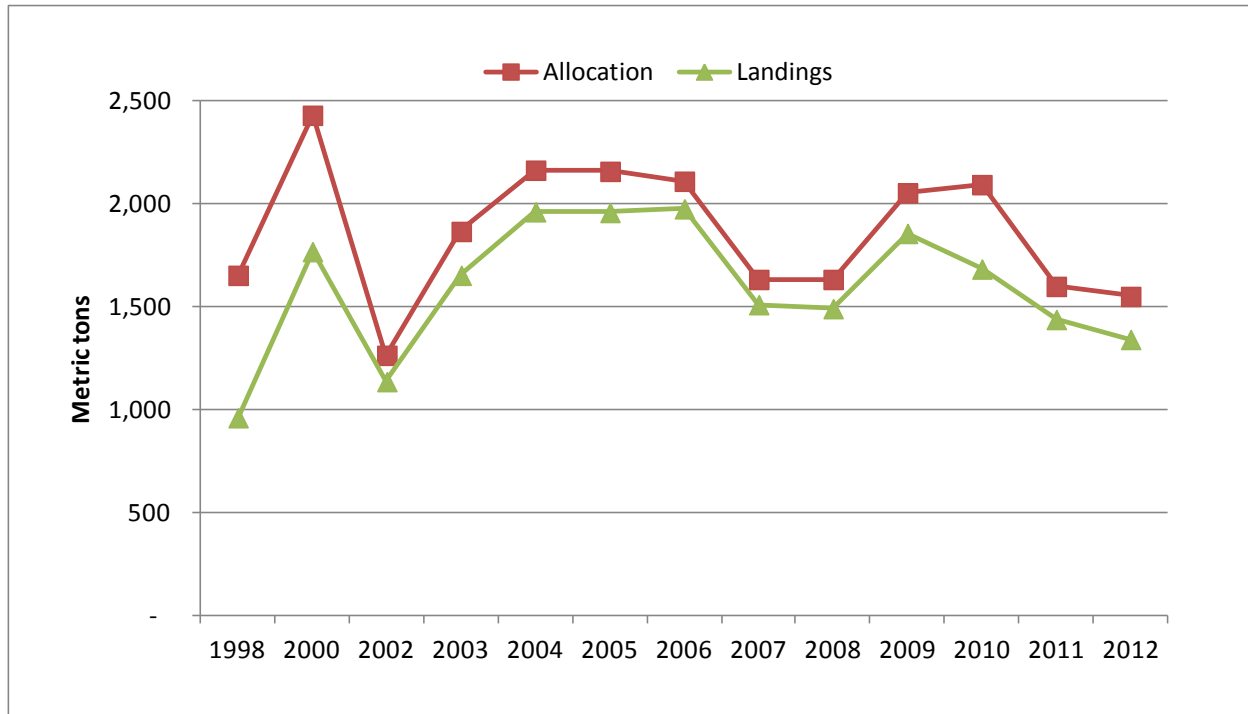


Figure 3-3. The LEFG sablefish primary season allocation and landings (1998 through 2012). The landings in 1998 and 2000 do not include the “mop-up” fishery.

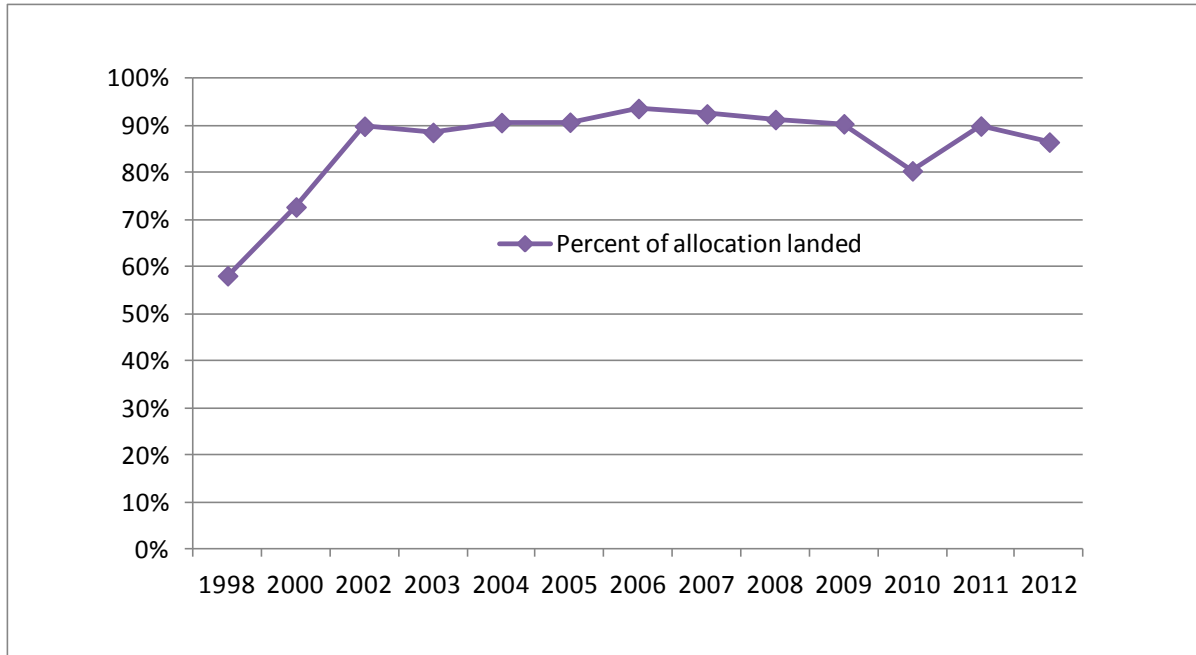


Figure 3-4. The LEFG sablefish primary season landings as a percent of the allocation (1998 through 2012). Landings in 1998 and 2000 do not include the “mop-up” fishery.

For the period of the program, Tables 3-2 and 3-3 compare the number of vessels and their landings with the various possible permit combinations in 2002, 2004, 2008, and 2012. From the snapshots within the first 12 years of the program provided by the tables, there does not appear to be any consistent direction of change that would indicate significant consolidation or disaggregation of permits and landings on a per vessel or fleet level. The number of vessels with combinations other than a single Tier 3 permit varied only slightly between 58 and 62 vessels. The main difference between years is due to the number of vessels with only a single Tier 3 permit (second row from the bottom in Table 3-2). Table 3-2 also displays the percent of the sablefish trawl individual fishing quota (IFQ) harvested by vessels with tier permits during the years 2011 through 2013 (17.2 percent).

Figure 3-5 displays how the participating vessels and concentration of landings in the primary sablefish fishery changed during selected years between 1996 and 2012. The participating vessels decreased fairly consistently from a high of around 200 in 1996 to a low of 82 in 2006. After 2006, the number of vessels participating in the primary fishery increased to 84 in 2008, 90 in 2010 and 97 in 2012. The number of vessels participating in 2012 was the highest since 92 participated in 2004.

Figure 3-6 graphs the concentration of landings and the cumulative share of vessels making landings in the LEFG sablefish fishery during selected years from 1996-2012. An equal distribution line has been added to indicate the shape of the curve if each vessel landed exactly the same amount in a given year. Greater deviations from the equal distribution line indicate

relatively greater concentration of landings among fewer vessels. The graph shows the distribution changing over the years after program implementation. The dark 1996 line shows the distribution during the last year of the derby fishery. The 1997 line shows the degree to which equal cumulative limit management equalized distribution of harvest among vessels. The 1998 and 2000 lines show a move toward the 1996 distribution. After the permit stacking provisions went to effect in 2001, the lines move even closer to the 1996 line. The similarity of the curves for the earliest year, 1996, to the most recent year, 2012, is striking (see Section 3.4 for additional discussion of this graph). Although many fewer vessels participated in the fishery in 2012 than in 1996, they delivered a similar cumulative distribution of landings in both years. This is reinforced by comparing the Gini coefficient values for 1996 and 2012 from Figure 3-7. Gini coefficients are an indicator of the deviation from the equal distribution line shown in Figure 3-6. A Gini coefficient of 1.0 indicates an equal distribution of landings, while values below 1.0 indicate increasingly concentrated landings distributions.

Information on sablefish permit prices proved to be too limited for use in determining any trends in the permit values over time. Table 3-4 shows recent offerings of tier permits from Dock Street Brokers website. This snapshot shows a preponderance of trading for Tier 3 permits (the lowest quota share level).

## **3.2 Maintain or Direct Benefits toward Fishing Communities**

### ***3.2.1 Background***

This objective relates most directly to NS 8 and FMP Objective 16 (take socio-economic needs of fishing communities into account)<sup>2</sup>. Did the program provide for the sustained participation of fishing communities and to the extent practicable, minimize adverse economic impacts on such communities?

To consider how well the sablefish program maintained or directed benefits toward fishing communities requires data on changes in the sablefish landings by West Coast port over the life of the program. Additionally, an owner-on-board requirement, intended, in part, to direct benefits toward local fishing communities, can be assessed by evaluating changes in the number of entities subject to the provision. The following information was considered or analyzed for this objective:

- Identification of the primary ports where sablefish landings (both primary season landings and landings made in the DTL fishery) are occurring;
- Calculation of a port involvement and dependence ratio; and
- Percent of landings by owner on board versus non-owner on board vessels.

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<sup>2</sup> Objective 17 at the time Amendment 14 was adopted.

Table 3-2. Comparison of the number of vessels and allocations for various combinations of stacked permits in 2002, 2004, 2008, and 2012. This is just a snapshot in time so that it may not capture changes in permit combinations during the season.

Possible Combinations of Stacked Permits by Tier				Relative Total Allocation for the Permit Combination	Number of Vessels															
Tier 1 (3.85)	Tier 2 (1.75)	Tier 3 (1.0)	Total Number		Total by Permit Combination				Stacking Only Longline Permits				Stacking Only Pot Permits				Stacking Both Longline and Pot Permits			
					2002	2004	2008	2012	2002	2004	2008	2012	2002	2004	2008	2012	2002	2004	2008	2012
3			3	11.55	1	1	1	2	0	0	0	0	1	1	1	2	0	0	0	0
2	1		3	9.45	1	1	2	3	0	0	1	1	0	0	0	0	1	1	1	2
2		1	3	8.7	2	1	1	1	0	1	1	1	1	0	0	0	1	0	0	0
1	2		3	7.35	-	1	1	3	-	1	1	1	-	0	0	0	-	0	0	2
1	1	1	3	6.6	4	7	5	2	1	1	1	0	0	0	0	0	3	6	4	2
1		2	3	5.85	-	2	-	-	-	1	-	-	-	0	-	-	-	1	-	-
	3		3	5.25	1	1	-	-	1	1	-	-	0	0	-	-	0	0	-	-
	2	1	3	4.5	2	2	4	3	2	2	2	2	0	0	0	0	0	0	2	1
	1	2	3	3.75	3	2	3	5	2	2	3	3	0	0	0	0	1	0	0	2
		3	3	3	2	6	9	2	1	4	7	1	0	0	0	0	1	2	2	1
2			2	7.7	1	1	-	1	1	0	-	1	0	1	-	0	0	0	-	0
1	1		2	5.6	2	3	3	-	2	2	1	-	0	0	0	-	0	1	2	-
1		1	2	4.85	3	1	2	2	1	0	0	0	0	0	0	0	2	1	2	2
	2		2	3.5	1	2	1	3	0	1	1	2	0	0	0	0	1	1	0	1
	1	1	2	2.75	7	8	6	3	6	7	4	2	0	0	0	0	1	1	2	1
		2	2	2	7	9	10	13	6	7	8	12	0	1	1	0	1	1	1	1
1			1	3.85	7	4	4	3	4	2	3	2	3	2	1	1	0	0	0	0
	1		1	1.75	17	9	10	12	14	6	9	11	3	3	1	1	0	0	0	0
		1	1	1	49	29	22	39	43	26	20	35	5	2	1	3	1 <sup>a/</sup>	1	1	1
<b>TOTAL</b>					<b>110</b>	<b>90</b>	<b>84</b>	<b>97</b>	<b>84</b>	<b>64</b>	<b>62</b>	<b>74</b>	<b>13</b>	<b>10</b>	<b>5</b>	<b>7</b>	<b>13</b>	<b>16</b>	<b>17</b>	<b>16</b>

a/ This permit is endorsed for both longline and pot gear, and therefore, is recorded in the last four columns of the table.

Table 3-3. Comparison of sablefish landings by vessels under various allocations and combinations of stacked permits in 2002, 2004, 2008, and 2012; and share of sablefish trawl IFQ landed by these vessels in 2011-2013.

Combinations of Stacked Permits by Tier				Relative Total Allocation for the Permit Combination	Total Vessels with this Combination of Sablefish Permits				Sablefish Landings (1,000's of Pounds) within a Combination of Tiers																Share of Sablefish IFQ landed 2011-2012
									Total				Average per Vessel				Average Percent of Total Fleet Landings per Vessel				Percent of Total Fleet Represented by all Vessels with this Combination				
Tier 1 (3.85)	Tier 2 (1.75)	Tier 3 (1.0)	Total Number of Permits	2002	2004	2008	2012	2002	2004	2008	2012	2002	2004	2008	2012	2002	2004	2008	2012	2002	2004	2008	2012		
3			3	11.55	1	1	1	2																	
2	1		3	9.45	1	1	2	3																	
		1	3	8.7	2	1	1	1																	
			Subtotal		4	3	4	6	363	543	520	653	91	181	130	109	3.6%	4.2%	4.0%	3.7%	15%	13%	16%	22%	5.7%
1	2		3	7.35	-	1	1	3																	
1	1	1	3	6.6	4	7	5	2																	
			Subtotal		4	8	6	5	245	894	489	418	61	112	82	84	2.4%	2.6%	2.5%	2.8%	10%	21%	15%	14%	1.8%
1		2	3	5.85	-	2	-	-																	
		3	3	5.25	1	1	-	-																	
		2	3	4.5	2	2	4	3																	
			Subtotal		3	5	4	3	132	396	206	117	44	79	52	39	1.8%	1.8%	1.6%	1.3%	5%	9%	6%	4%	-
	1	2	3	3.75	3	2	3	5																	
		3	3	3	2	6	9	2																	
			Subtotal		5	8	12	7	156	407	477	252	31	51	40	36	1.2%	1.2%	1.2%	1.2%	6%	9%	15%	9%	-
2			2	7.7	1	1	-	1																	
1	1		2	5.6	2	3	3	-																	
1		1	2	4.85	3	1	2	2																	
			Subtotal		6	5	5	3	323	574	351	209	54	115	70	70	2.2%	2.7%	2.1%	2.4%	13%	13%	11%	7%	1.3%
	2		2	3.5	1	2	1	3																	
	1	1	2	2.75	7	8	6	3																	
			Subtotal		8	10	7	6	212	449	242	223	26	45	35	37	0.6%	1.0%	1.1%	1.3%	5%	10%	7%	8%	1.4%
		2	2	2	7	9	10	13	130	208	178	238	19	23	18	18	0.4%	0.5%	0.5%	0.6%	3%	5%	5%	8%	-
1			1	3.85	7	4	4	3	267	186	335	152	38	46	84	51	0.9%	1.1%	2.5%	1.7%	6%	4%	10%	5%	5.9%
	1		1	1.75	17	9	10	12	261	240	229	236	15	27	23	20	0.4%	0.6%	0.7%	0.7%	6%	6%	7%	8%	1.0%
		1	1	1	49	29	22	39	414	428	258	457	8	15	12	12	0.2%	0.3%	0.4%	0.4%	10%	10%	8%	15%	-
<b>TOTAL</b>					<b>110</b>	<b>90</b>	<b>84</b>	<b>97</b>	<b>2,503</b>	<b>4,323</b>	<b>3,285</b>	<b>2,955</b>								<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>17.2%</b>	

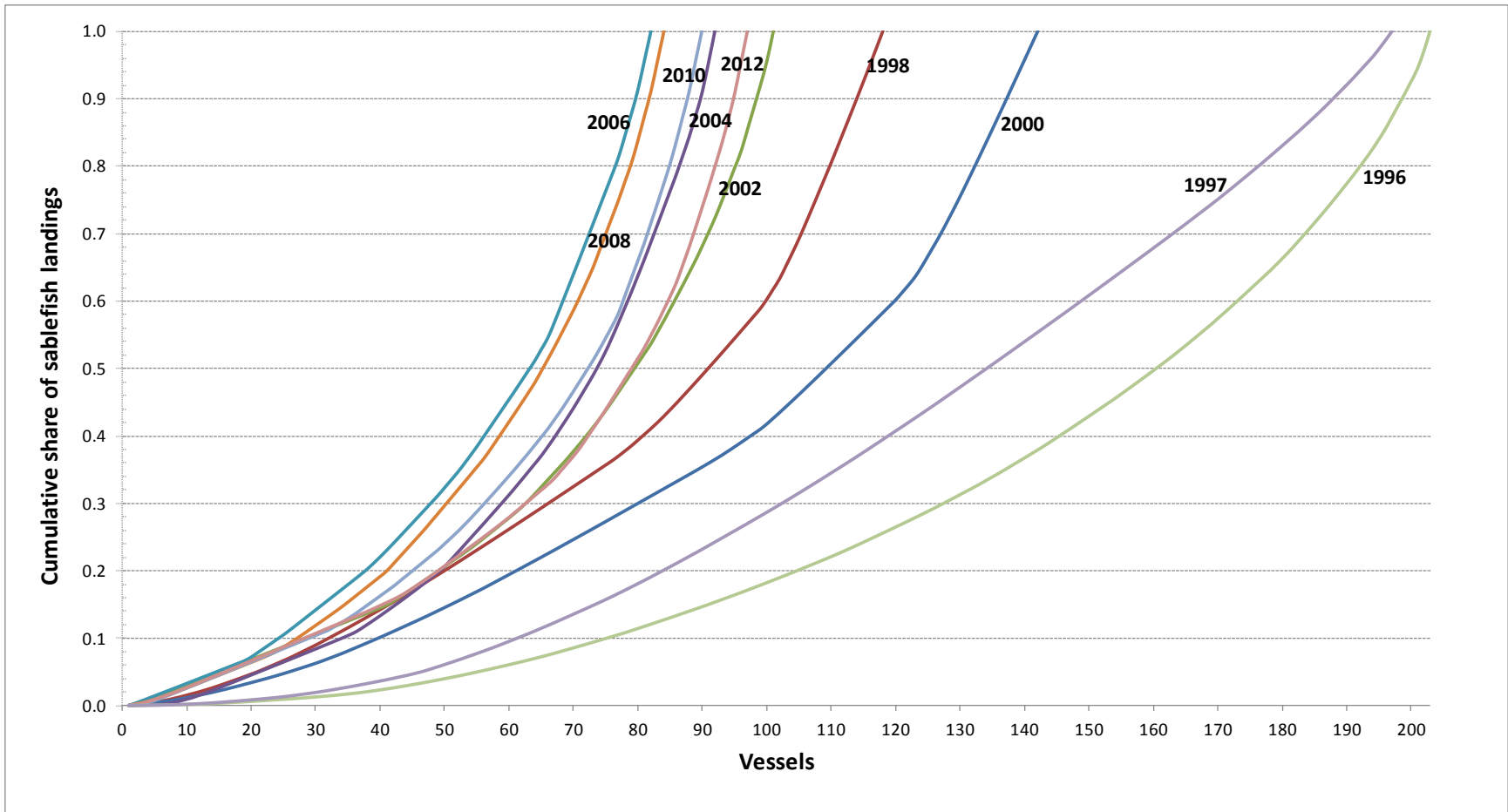


Figure 3-5. Cumulative share of landings by the number of vessels participating in the LEFG sablefish fishery during selected years from 1996-2012.

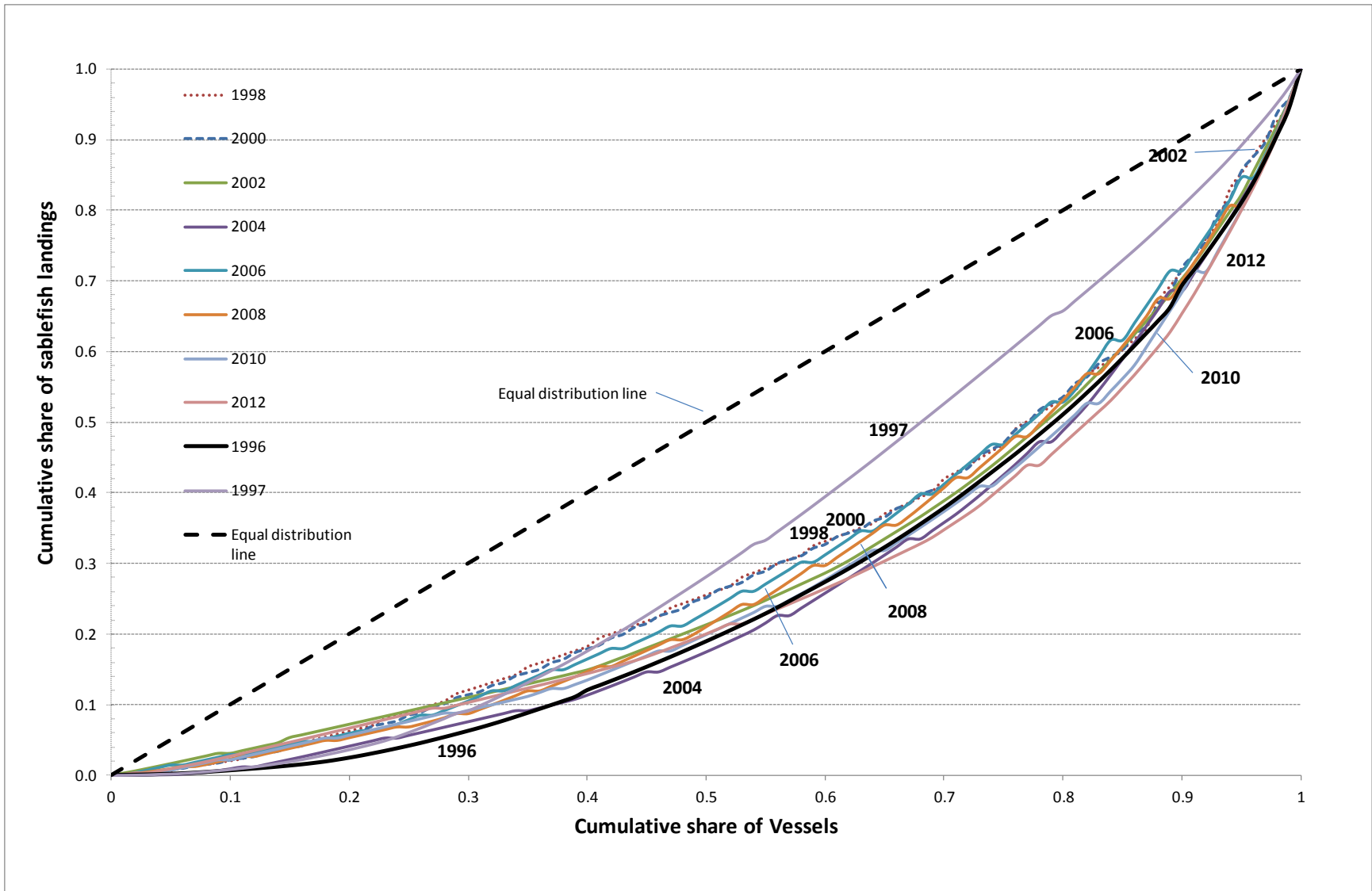


Figure 3-6. Concentration of landings by the cumulative share of vessels participating in the LEFG sablefish fishery for selected years from 1996-2012.



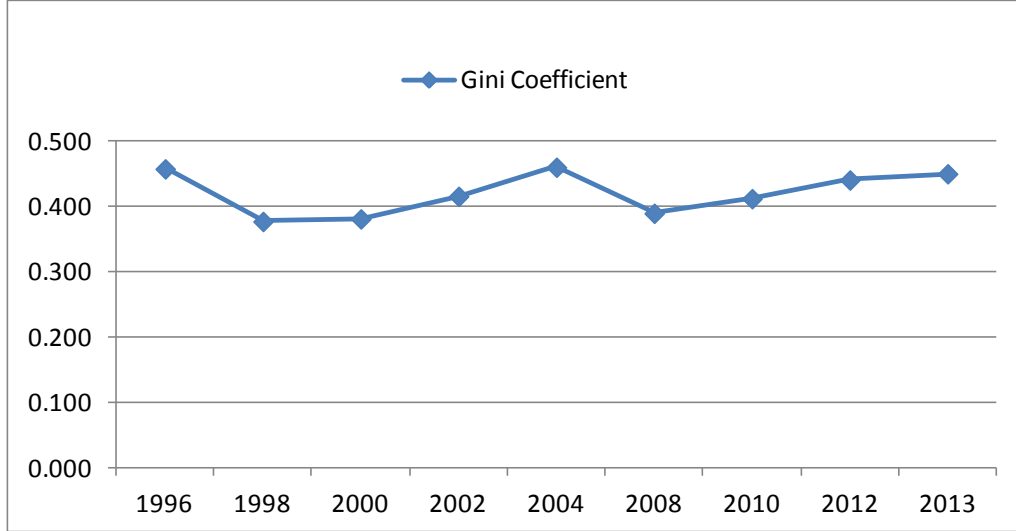


Figure 3-7. Gini coefficients for the concentration of landings by vessels in the LEFG sablefish fishery for selected years before and after the permit stacking program.

Table 3-4. Recent listings of West Coast longline sablefish endorsed permits offered for sale on Dock Street Brokers ([info@dockstreetbrokers.com](mailto:info@dockstreetbrokers.com)).

Type of Permit	Asking Price	Updated	Notes
Tier 1	\$825,000	11/26/2012	- pot endorsed
Tier 2		05/17/2013	- Call for Pricing
Tier 2		03/05/2014	- Will trade for northern sablefish trawl
Tier 3	\$165,000	08/23/2013	- make offer
Tier 3	\$197,000	10/15/2013	- Good to ~70' LOA
Tier 3	\$155,000	03/10/2014	- SOLD
Tier 3	\$140,000	02/21/2014	- Price Reduced** good to 51 feet
Tier 3	\$208,000	01/25/2013	
Tier 3	\$145,000	02/25/2014	- Sale Pending
Tier 3	\$170,000	04/02/2013	
Tier 3		05/17/2013	- Pot Endorsed Call for pricing

### 3.2.1 Assessment

Figure 3-8 displays port involvement and Figures 3-9 and 10 display revenue dependence by port groups in the LEFG sablefish fishery (LEFG landings or revenue in one port group divided by total sablefish landings or revenue in all ports).

**[Additional comments to be developed on figures 3-8 through 3-10]**

Table 3-5 shows the distribution of landings in selected years by vessels controlled by entities that were exempt from the owner-on-board permit requirement. The table shows the number of vessels that participated in the primary fishery with owner-on-board exemptions declined from 2004 to 2008 and remained relatively unchanged from 2008 to 2012. As a share of total vessels, the number of vessels with owners exempt from the provision has declined across all years. The share of total primary fishery landings accounted for by these vessels also declined during that time, although not as precipitously.

Table 3-5. Summary of landings in selected years by vessels participating in the primary sablefish fishery and operating under permits that were exempt from the owner-on-board requirements.

Year	Vessel Count	Share of Total Vessels	Landings (mt)	Share of Total Landings
2004	72	78.3%	1,223	62.4%
2008	43	51.2%	687	46.1%
2012	44	45.4%	579	43.2%

## 3.3 Prevent Excessive Concentration of Harvest Privileges

### 3.3.1 Background

This objective relates to NS 4 on allocation and NS 8 and FMP Objective 16 on fishing communities. In the Council's effort to reduce capacity in the fishery, did they provide an environment for excessive concentration of the remaining harvest privileges among a few individuals or entities? Such concentration could lead to significant changes in which and how much various communities receive the benefits of the fishery.

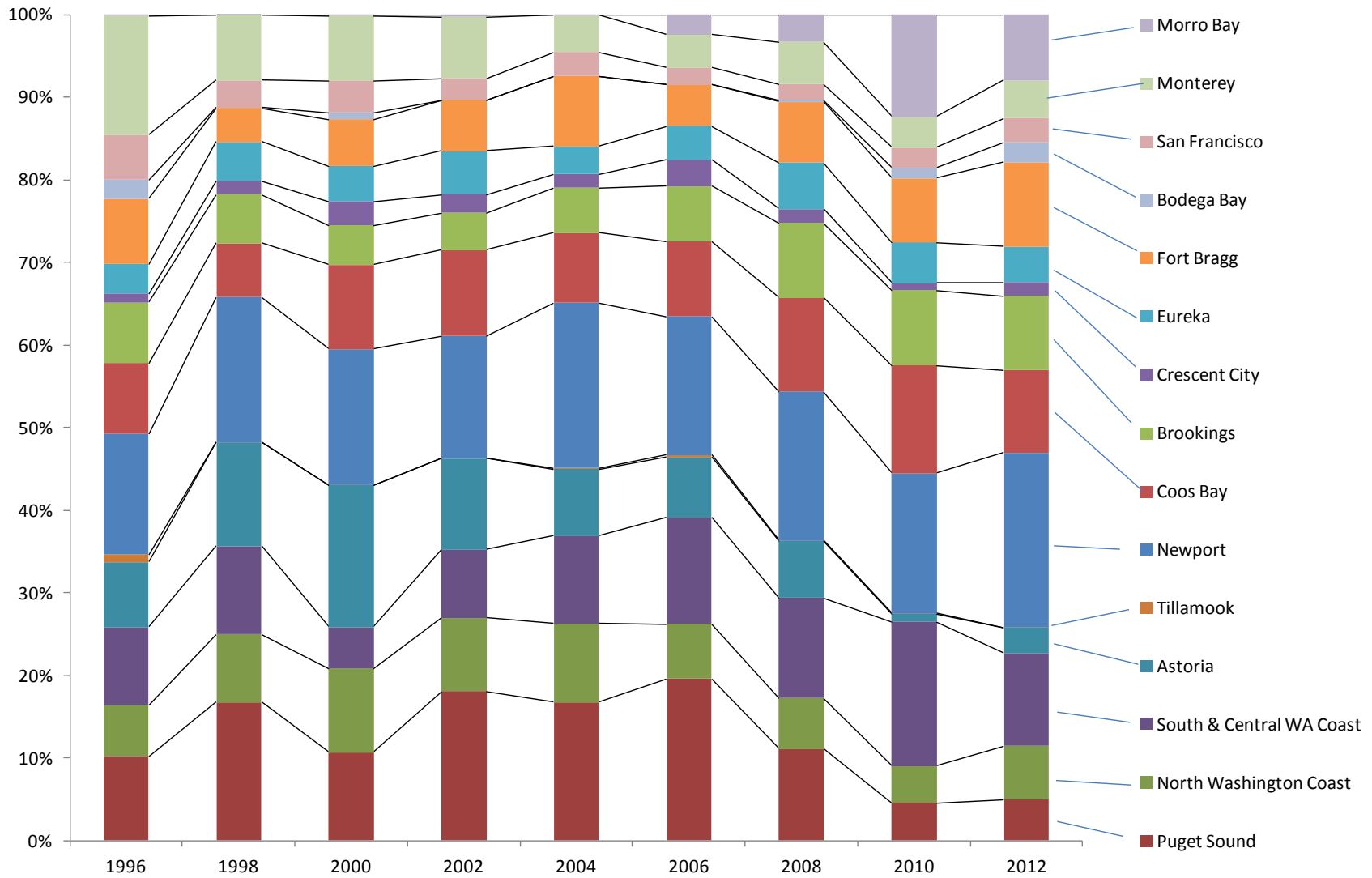


Figure 3-8. Percent involvement in the LEFG sablefish landings by port group.

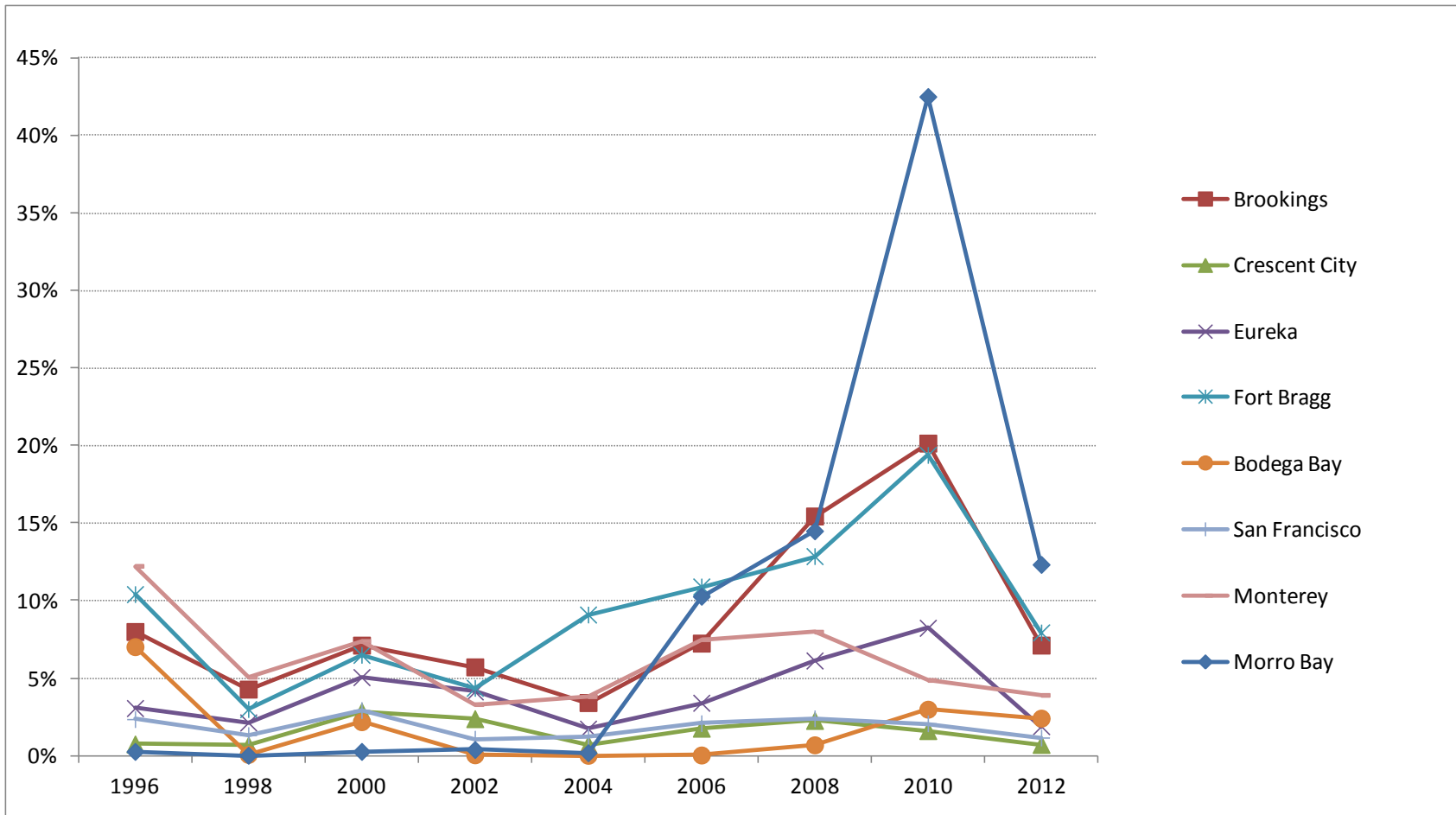


Figure 3-9. Percent revenue dependence on LEFG sablefish landings by port group from Brookings, Oregon to Morrow Bay, California.

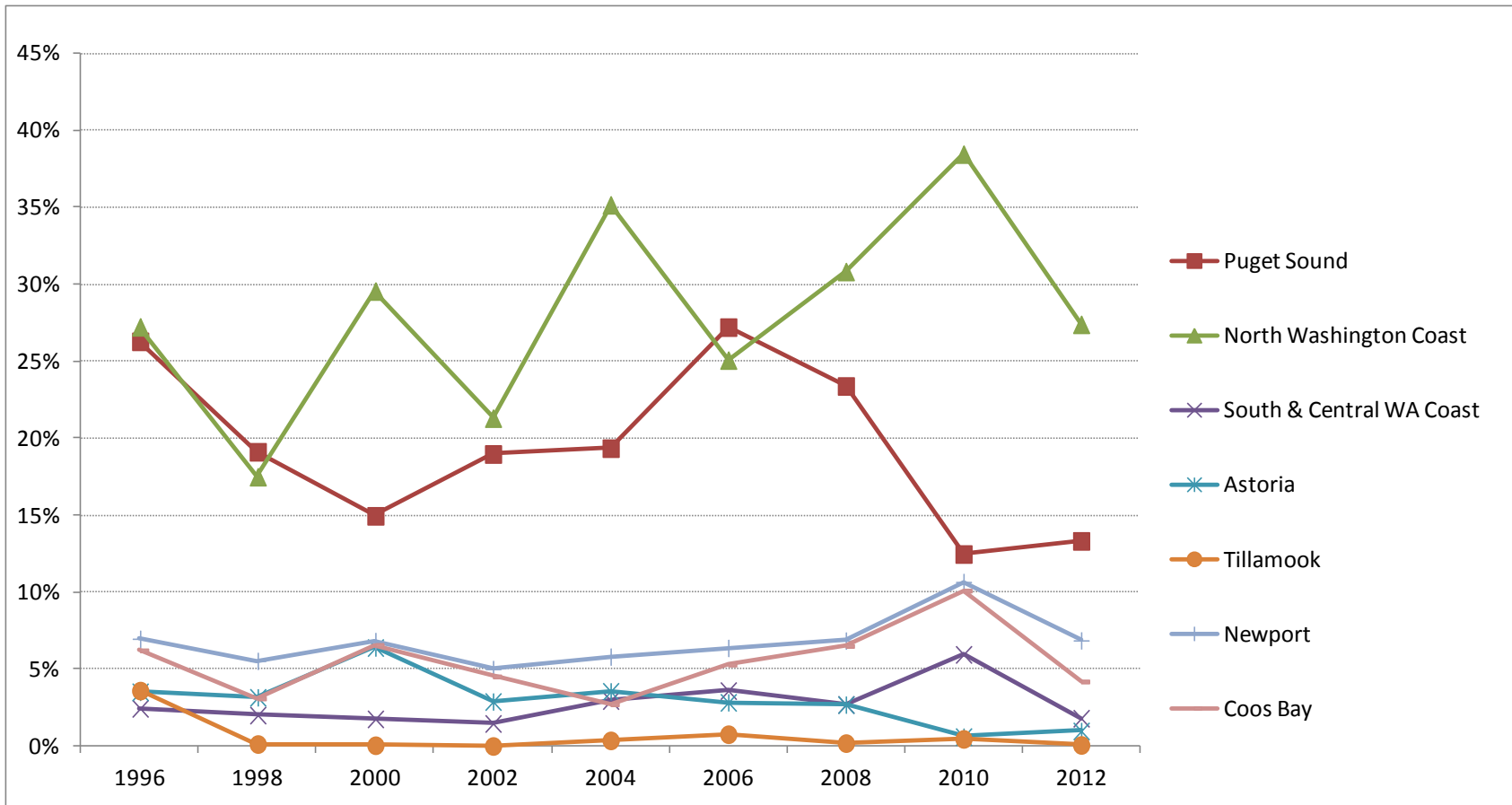


Figure 3-10. Percent revenue dependence on LEFG sablefish landings by port group from the north Washington coast to Coos Bay, Oregon.

### **3.3.2 Assessment**

#### **To be completed:**

- **Graph of ownership concentration**
- **Gini Coefficients of ownership concentration**
- **Graph of control concentration**
- **Gini coefficients for control concentration**

## **3.4 Mitigate the Reallocational Effects of Policies Just Prior to This Program (e.g., the Three Tier System and Equal Limits)**

### **3.4.1 Background**

This very specific objective can really be categorized as a subset of the broader objective of promoting overall equity which is covered in Section 3.5. Both objectives relate to National Standard 4 on allocation, FMP Objective 12 on equitable allocation, and FMP Objective 14 on minimizing disruption.

The regulatory regime prior to Amendment 14 had included a series of partial and short-term policies and actions in an attempt to end the derby fishery (Table 3-1). In 1997 the regulations substantially flattened the distribution of harvest among vessels in the fleet by giving equal cumulative limits to fishery participants who qualified for LEFG sable fish endorsements. These limits were substantially higher than the maximum landings ever taken by many of the lower level participants and substantially lower than historic landings of the high liners. The flattening effect of the equal limits can be seen by comparing the annual lines in Figure 3-6.

### **3.4.2 Assessment**

To assess how well the sablefish program mitigated the effects of the temporary policies used to modify the derby fishery requires comparing the harvest of vessels prior to the 1997 equal cumulative limit management regime with that following full implementation of the stacking program. The first step toward restoring the prior distribution was the implementation of tiered cumulative limits in 1998. Each sablefish endorsed permit was assigned to one of three tiers based on its landing history. Tier 1 permits received cumulative limits 3.85 times that of Tier 3 permits and Tier 2 permits received cumulative limits 1.75 times that of Tier 3 permits. The 1998 and 2000 lines in Figure 3-6 are close to one another and illustrate movement toward the distributions of harvest that were present during the 1996 derby. The derby year reflects a typical distribution which occurs when all vessels are on an equal footing in competition with one another with respect to speed of harvest. The final step in mitigating the reallocation effects was implementation of the permit stacking program in August 2001 with its allowance for up to three tier endorsed permits and their associated tier limits to be stacked on a single vessel. The

effectiveness of this policy is indicated by the fact that the annual lines in Figure 3-6 for the years after implementation become ever closer to the 1996 line. In general for the derby system, vessels competed on the basis of how quickly and effectively they could fish. The tier system replaced speed with other economic factors in determining the competitive outcome and results in a somewhat similar distribution in terms of concentration of harvest.

## **3.5 Promote Equity**

### ***3.5.1 Background***

The objective of promoting equity is an overarching objective that includes the objective of the previous section (3.4). Both objectives relate to NS 4 on allocation, FMP Objective 12 on equitable allocation, and FMP Objective 14 on minimizing disruption. The issue of compliance (with the regulations) also bears heavily on this objective. If some fishermen are not complying with the program they are often viewed as gaining an unfair advantage over other fishermen.

### ***3.5.2 Assessment***

Much of this objective was addressed through the re-establishment of the opportunity for a distribution of harvest among vessels similar to distributions present prior to imposition of equal cumulative limits in 1997 and similar to what is seen in many other fisheries.

With regard to compliance with regulations, the number of vessels landing amounts of sablefish in excess of the limits associated with their stacked permits is provided in Table 3-6 (**To be developed**)

## **3.6 Resolve or Prevent New Allocation Issues from Arising**

### ***3.6.1 Background***

This objective relates to National Standard 4 on allocation and FMP Objectives 12 on equitable sharing and 14 on minimizing disruption.

### ***3.6.2 Assessment***

Since implementation of the permit stacking program in 2002, there have been few calls for any changes to the allocations within the fixed gear sector. Most discussion and concern has been with intersector allocations. However, even during the Council's formal consideration of its groundfish allocations for Amendment 21, it was decided that there was not a sufficient need to examine reallocations of sablefish among sectors, relative to other workload concerns.

Within the limited entry fixed gear sector, 15 percent of the sablefish is set aside for a daily trip limit fishery. There has been some suggestion that this allocation and its management might be revisited, but up until the time this program review was initiated, the interest in modifications has not been sufficient to bring the topic onto the Council agenda.

## **3.7 Promote Safety**

### ***3.7.1 Background***

This objective relates to National Standard 10 and FMP Objective 17 on safety. Before Amendment 14 was implemented, the LEFG sablefish fishery had become a classic derby fishery, lasting only 5 days in 1996. Such classic derby fisheries are well known for creating safety hazards. The short seasons provide a strong incentive to fish regardless of the weather in order to get an adequate share of the catch and also encourage taking risks with overloading the capacity of the vessel or to skip importance maintenance at inopportune times (National Research Council, Marine Board, Committee on Fishing Vessel Safety, 1991).

### ***3.7.2 Assessment***

At this time, it is not apparent that there is any direct information that might be useful in evaluating the safety record of the fleet before and after implementation of the fixed gear stacking program. However, the Northwest Fisheries Science Center is in the process of developing a more detailed report on the safety effects of the limited entry sablefish program. Following implementation of Amendment 14 there has been an absence of anecdotal reports on safety problems associated with the primary fishery, particularly in comparison to concerns expressed during the derby fisheries of the mid-1990s. While the United States Coast Guard (USCG) keeps safety statistics, it is only possible to isolate those statistics by date and area. There is no direct information on the fishery in which the vessel was participating (particularly when events prevented a vessel from making a landing). Page A-17 of the Council's Fishery Ecosystem Initiatives Appendix to the Pacific Coast Ecosystem Fishery Plan (PFMC, 2013) provides a table of recorded vessel incidents by FMP. However, it is not possible to determine which groundfish fishery incidents were in the primary sablefish fishery. The elimination of the derby fishery through extension of the season to seven months could be expected to have a positive effect on reducing the pressure to fish under unsafe conditions.

## **3.8 Improve Product Quality and Value**

### ***3.8.1 Background***

This objective relates to National Standard 5 on efficiency and FMP Objective 6 on net national benefits. Determining achievement of this objective could be reflected by changes in the sales price and volume of sablefish after implementation of Amendment 14. However, changes in exvessel price (the most readily available data) are strongly driven by markets which might overshadow any price change resulting from a change in product quality. For example, sales volume and prices may have been more influenced by worldwide shifts in fuel prices and, because sablefish is essentially a luxury good, by the worldwide recession. A price comparison of the difference between fixed-gear caught and trawl-caught sablefish during the derby, relative to the difference in prices between these gears after the implementation of the permit stacking



program, could provide some limited insight. A widening gap might indicate an improvement in the quality of fixed gear caught sablefish. Larger fish generally bring higher prices and might be considered a higher quality. Size of fish landed may also be increased by gear selectivity or highgrading which the longer season may make more possible. However, there is no consistent and reliable fish ticket information on size of fish landed.

### **3.8.2 Assessment**

[To be completed--Possible indicators: Compare prices of trawl caught, longline caught, and pot caught sablefish holding time of year constant), by year for 1994-2012.]

## **3.9 Avoid Creating Substantial New Disruptive Effects**

### **3.9.1 Background**

This objective relates to FMP Objective 15 on minimizing disruption. The derby fishery and equal cumulative limit management system that this permit stacking program replaced were extremely disruptive. When the new program was proposed for implementation, only seven entities provided formal comments on the proposed rule (two state agencies, one commercial organization, and 4 individuals). Public comment generally included overall positive comments about the program. Dissent generally concerned specific issues relating to a few individuals (e.g., permit allocation, ownership or control, and owner-on-board requirements). The comments were generally split between support or opposition to the owner-on-board requirement, the limit on the number of permits that could be stacked, and the restrictions on processing at sea.

### **3.9.2 Assessment**

This objective was achieved with program implementation that allowed for a longer, more reasonable fishing season and by allowing fishermen to acquire and stack permits rather than directly changing the allocation among permits. Given that permit caps (tier limits) were already in place, the mere creation of a longer season allowed participants to have more flexibility in when they went fishing. They were more able to avoid dangerous weather events and move their permits around as needed. In the 12 years over which the program has operated, the Council has received little, if any, complaint about disruption caused by the program.

## **3.10 Create a Program that Will Readily Transition to a Multi-month IQ Program**

### **3.10.1 Background**

The type of program created for the sablefish fishery assists in attaining capacity reduction recommendations in the Groundfish Strategic Plan and responds to NS 6 (take into account

variations and contingencies). Individual harvest quotas that are transferable provide the fleet with substantial flexibility to respond to changing conditions in the fishery or for the changing conditions faced by an individual fisherman. The properties of transferability and divisibility also address NS 5 (efficiency) and FMP Objective 6 (achieving the best possible net economic benefit).

### ***3.10.2 Assessment***

At the time it was implemented, the permit stacking program transitioned to a multi-month catch share program with a season that is seven months long. To date, there have been no moves to consider allowing the sablefish tiers to be separated from permits and divided into smaller units, such that the permit stacking program would resemble a more typical IFQ program. While such divisibility could be added to the program, this might diminish achievement of other standards and objectives. Net effects would have to be assessed as part of the deliberations on such a change.

While there has been no Council action or discussion toward a transition to a more typical IFQ program, the objective of Amendment 14 was to create a program that could readily make such a transition, not necessarily to make the transition. The existence of an already implemented allocation among permits addresses one of the major challenges for new catch share programs (the initial allocation). On that basis, this objective might be considered to have been met.

## **3.11 Management Costs and Cost Recovery**

The MSA requires LAPPs to develop a methodology and means to identify and assess management, data collection and analysis, and enforcement programs that are directly related to and in support of the LAPP. Further, the Secretary of Commerce is authorized to establish and collect fees paid by holders of limited access privileges that will cover the costs of management, data collection and analysis, and enforcement activities; not to exceed 3 percent of the ex-vessel value of the fish harvested under the program. The LEFG sablefish program was established prior to the addition of these requirements in the MSA and, to this point, a means to identify costs or to establish a cost recovery program have not been developed.

Prior to the program review, incremental costs associated with this LAPP were likely minimal, although at this time no quantitative assessment of incremental costs has been done. However, the actions being considered during this review process would implement an electronic fish ticket and modify the control rules. Also, the Council has taken action to allow trawl and LEFG endorsed permits to be registered to the same vessel at the same time. These actions may introduce additional incremental costs. For example, implementation of modified control rules could require an additional vessel ownership interest form, as well as new database programming requirements that would take time and would require additional funding to implement. These are examples of additional incremental costs that could be tracked and partially recovered through implementation of a cost recovery program for the LAPP.

## **4.0 RESEARCH NEEDS**

[Consult with the SSC, GMT, GAP and Council Research and Data Needs 2013, to develop recommendations]

### **4.1 Biological**

### **4.2 Socioeconomic**

### **4.3 Community**

## **5.0 SUMMARY AND PRELIMINARY CONCLUSIONS**

[To be completed for Public Review Draft after considering input at April Council meeting]

## **6.0 COUNCIL RECOMMENDATIONS**

[To be developed by Council in June]

## **7.0 REFERENCES**

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