

STAFF SUMMARY OF PUBLIC COMMENT ON TRAWL INDIVIDUAL QUOTAS

This document covers the following topics and provides related public comments:

an overview of needed decisions ..... 1  
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 design elements for IFQs ..... 5

Each set of public comments is provided in a text table for which the source of the comment is noted to the right. Organization acronyms used are as follows:

BSCC	Bandon Submarine Cable Committee
CBTA	Coos Bay Trawlers Association
CJC	Coastal Jobs Coalition
ED	Environmental Defense
FMA	Fishermen’s Marketing Association
IPHC	International Pacific Halibut Commission
MTC	Midwater Trawlers Cooperative
MBCF/CBOSF	Morro Bay Commercial Fishermen’s Organization/Crab Boat Owners of San Francisco
PCFFA	Pacific Coast Federation of Fishermens Associations
PMCC	Pacific Marine Conservation Council
POORT	Port Orford Ocean Resource Team
Survey (ED)	Results from survey work done by Environmental Defense
UAC	United Anglers of California
UASC	United Anglers of Southern California
WCSPA	West Coast Seafood Processors Association

**Overview of Decisions Needed on Trawl Sector Dedicated Access Privileges**

**IQ (DAP) EIS:**

- Develop Management Regime Alternatives
1. Design the Tools (Scoping Information Document Section 2.1.1)
  2. Decide on the Species to Which the Tools Apply (Scoping Information Document Section 2.1.2)
- Settle Allocation Issues Between Trawl Sectors (Scoping Information Document Section 2.1.3)

**Allocation EIS:**

Settle Intersector Allocation Issues, as Necessary - the management regime (Status Quo, IFQs, Sector Caps or other) does not fix the intersector allocations.

Public comments:

Include recreational fisheries and allow cross sector transfers. A hard allocation guaranteeing catch for one sector is unfair.	UASC
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### Public Comments: Process Concerns

#### Should the Council be considering IFQs now?

Consideration of IFQs is premature	
Intersector allocation should be handled first	CJC, PMCC, PCFFA, WCSPA, one individual, Survey (ED), UAC
There should be a programmatic EIS first	PMCC, UASC
The bycatch EIS should be implemented first	PMCC
National standards should be developed first	PMCC, PCFFA, UASC, UAC
Buyback effects need to be evaluated first	PMCC, PCFFA
Proceed only through a double referendum requiring two-thirds majority (1st referendum would be on whether or not to consider, second on whether or not to adopt)	PMCC
Habitat impacts should be understood first	UASC
Justification for considering the policy is not strong enough	PCFFA
The West Coast groundfish trawl fishery does not fit under the NRC criteria for fisheries for which IFQs should be considered.	PMCC
Move the IFQ process forward	FMA, ED, CBTA, MTC and 1 individual

#### Other process concerns.

The recreational fishery should be included in the design of the intersector allocation	UASC
TIQC membership should include	
recreational representation	UASC/UAC
all stake holders	ED, Survey (ED)
coastal community representation	ED
Community concerns are not being addressed	Survey (ED)
Conduct an open process	ED
Move forward soon with intersector allocation	ED
The notice of intent for an EIS was deficient and misleading	PMCC
The process leading to public scoping was flawed	PMCC
Consult with IPHC if halibut retention by trawl is to be proposed	IPHC
There is a high cost to participate in the process	Survey (ED)
Manner of notice and timing did not give open access fishermen participating in the salmon troll fishery an opportunity to participate	MBCF/CBOSF

## Design of the Tools

Tools in the scoping information document and related provisions for the Council recommended alternative from the programmatic bycatch EIS.

Tools	Council Recommended Bycatch Alternative(Alt 7)
Status Quo (Trip Landing Limits and Seasons)	“establishing landings limits for target species based on co-occurrence ratios with overfished stocks”
IFQs	“ future use of IFQ programs for appropriate sectors of the fishery” “incorporate the Strategic Plan’s goal of reducing overcapacity in all commercial fisheries”
Trip Catch Limits	
Sector Limits	“sector-specific caps for overfished and depleted groundfish species”

### Public comments.

Community Development Quotas	CJC, POORT, ED, Survey (ED)
CDQs Opposed	Individual (1)
Individual Processor Quotas	
IPQs Opposed	Individual (1)
Trip Landing Limits with Extended Periods (3, 4, or 6 months)	PMCC
Reduce Season Length	Individual (1)
Consider Marine Reserves and Reduce Quotas (50% in first year and 10% in each year thereafter)	Individual (1)

## Decide on the Species to Which the Tools Apply

Species to which tools apply from the public information document.

Non-Whiting Fishery				
	IFQs	Cumulative <b>Catch</b> Limits	Sector Catch Caps	Prohibited Species
Alt 1. Status Quo (Trip Landing Limits)	None	None	None	Halibut, Salmon Etc.
Alt 2	Species Targeted Only by Trawl and Species for Which There is a Trawl Allocation	Most Other Species with OYs	Rebuilding Spp or Spp with Very Low OY	Halibut, Salmon Etc.
Alt 3	OY Species (except as noted under "Sector Catch Caps")	Non-OY Species	OY Species with Extremely Low OYS	Halibut, Salmon Etc.
Alt 4	All Groundfish Species	None	None	Halibut IBQs (Suboption: Allow Retention).

Whiting Fishery				
	IFQs	Cum <b>Catch</b> Limits	Sector Catch Caps	Prohibited
Alt 1 Status Quo (Seasons)	None	None	None	Halibut, Salmon Etc.
Alt 2	Whiting	None	Bycatch Species (rollover unused catch to other whtg sectors, allow IFQ purchase from non-whgt sectors)	Halibut, Salmon Etc.
Alt 3	Whiting and Bycatch Species Managed With OYs	None	Pooling of IFQ in Co-ops Allowed (no transfers between whtg and nonwhgt sectors)	Halibut, Salmon Etc.
Alt 4	Whiting and Bycatch Species	None	Pooling of IFQ in Co-ops Allowed (transfers between whtg and nonwhgt sectors allowed)	Halibut IBQs (Suboption: Allow Retention).

Public comments:

Bycatch caps for overfished species	ED, PMCC (see Bycatch Cap Design Elements)
IFQ for All species	WCSPA

## Bycatch Cap Design Elements

Public comments.

Sector Bycatch Caps for Overfished Species <ul style="list-style-type: none"> <li>● Caps for the trawl fleet or possibly subdivisions of the trawl fleet (explicit allocation of an amount of overfished species)</li> <li>● Sector stops fishing on attainment of the cap.</li> <li>● Adequate monitoring (not necessarily 100% monitoring)</li> <li>● Opt out option: Vessels opting out                         <ul style="list-style-type: none"> <li>○ receive a “proportionate” share of the cap for their individual use.</li> <li>○ must carry an at-sea compliance monitor or otherwise assure 100% accounting of catch.</li> <li>○ receive higher cumulative limits for nonoverfished species</li> <li>○ can continue fishing even if their sector is shut-down due to exceeding a cap</li> <li>○ can pool caps with others who have opted out.</li> </ul> </li> <li>● No action recommended with respect to nonoverfished species.</li> </ul>	PMCC
Sector Bycatch Caps - Nontransferable	PMCC
Sector Bycatch Caps - Transferable	ED

## IFQ Design Elements

### A.1.0 Portion of the LE Trawl Fleet Allocation for Which IFQs are Required

Summary of Options from Public Information Document:

IFQ Program Scope - Option 1: Require IFQ for all catch by LE trawl vessels. For landings LE trawl vessel landings with OA gear	
SubOption A	Apply open access fishery cumulative limit and other harvest regulations.
SubOption B	<b>Allow landings in excess of open access fishery cumulative limits, so long as landings are completely covered by IFQ.</b>
IFQ Program Scope - Option 2: Require IFQ only for groundfish trawl catch by LE trawl vessels	
SubOption A	<ul style="list-style-type: none"> <li>• Split the trawl allocation between IFQ and nonIFQ harvest</li> <li>• Manage groundfish harvest by trawl vessels using open access gears to stay within the suballocation.</li> </ul>
SubOption B	<ul style="list-style-type: none"> <li>• Maintain the same LE allocation</li> <li>• Change the accounting system such that catch of LE trawl vessel's using open access gears counts against the open access allocation.</li> <li>• Determine whether or not to make similar changes with respect to LE longline and fishpot vessels.</li> </ul>
SubOption C	<ul style="list-style-type: none"> <li>• Reallocate a portion of the LE allocation</li> <li>• Change the accounting system such that catch of LE trawl vessel's using open access gears counts against the open access allocation.</li> <li>• Determine whether or not to make similar changes with respect to LE longline and fishpot vessels.</li> </ul>

Public Comments: None

## A.2.0 Area Restrictions

### Summary of Options from Public Information Document:

Option 1:	Area restrictions based solely on the need to address stock conservation concerns.  Suboption: If some IFQ are to be catch area specific, all landings should occur in ports within the catch area, unless catch is kept separate and monitored at-sea.
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The TIQC recommended not adopting IFQs with landing area restrictions.

### Public Comments:

Landing or catch area specific IFQ based on biological and socio-economic need	ED, Survey (ED)
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## A.3.0 IFQ and LE Permit Holding Requirements

### Summary of Options from Public Information Document:

Option 1	Register IFQ to the vessel - vessels must cover the species with IFQ at the time of landing.
Option 2	Register IFQ to the vessel - vessels must cover the species within 24 the time of landing.
Option 3	Register IFQ to the vessel - vessels must cover the species with IFQ within 30 days of landing - no more fishing until covered.

These options may be combined with a suboption that requires that some threshold amount of unused IFQ be held at the time a vessel departs from port. The TIQC recommended not adopting an option that would require that all IFQ needed to cover a landing be held prior to departing from a port.

Public Comments: None

## A.4.0 Transfer Rules

### A.4.1 Transfer of IFQ to a Different Sector for Use

#### Summary of Options from Public Information Document:

IFQ Option 1	IFQ must be used within the trawl sector for which it was issued (e.g. establish separate IFQ classes for the whiting and nonwhiting fleets).
IFQ Option 2	IFQ may be traded between trawl sectors managed under the IFQ program.

Sector specific IFQs need to be considered for the following sectors and subdivisions

Trawl	Whiting	At Sea
		Shoreside
	Nonwhiting	

IBQ Option 1	Prohibit transfers outside the trawl sector.
IBQ Option 2	Allow transfers to gears that are legal for the species and allow those gears to retain catch taken under IBQ when operating in compliance with the IBQ program.

Public Comments: None

#### A.4.2 Eligible Owners/holders (Who May Own/hold)

##### Summary of Options from Public Information Document:

Option 1	Anyone eligible to own a US documented vessel.
Option 2	Stakeholders: include owners and lessees of LE permits or vessels, skippers/crew, processors, buyers, communities. (NOTE: If ownership is restricted to these classes, criteria will need to be established to identify membership in these groups.)

##### Public Comments:

Allow communities to form nonprofits and acquire IFQs	ED
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#### A.4.3 Leasing - Duration of Transfer

##### Summary of Options from Public Information Document:

Option 1	Permanent transfers only
Option 2	Leasing and permanent transfers. Suboption: Prohibit all permanent transfers (leasing only) during the first year of the program.

##### Public Comments:

Compel quota holders who have historically leased their permits to others to continue to lease their IFQ to those individuals.	Survey (ED)
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#### A.4.4 Time of Sale

##### Summary of Options from Public Information Document:

Option 1	Allow transfers any time during year.
Option 2	Allow transfers only at the end of year.
Option 3	Quota shares should not be transferred from any account for which there is a deficit of quota pounds (i.e. any account for which landings exceed quota pounds for at least one species).

Public Comments: None

#### A.4.5 Divisibility

##### Summary of Options from Public Information Document:

Elements of Divisibility Provisions	
1.	Quota Shares: nearly unrestricted divisibility - "many decimal points."
2.	Quota Pounds: divisible to the single pound

The TIQC recommended against adopting blocked shares.

##### Public Comments:

Blocked quota shares	ED-Survey
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#### A.4.6 Liens

##### Summary of Options from Public Information Document:

No special provisions recommended. The TIQC believed pledging IFQs as collateral is a matter of private contract, independent of the government program.

Public Comments: None

#### A.4.7 Accumulation Caps

##### Summary of Options from Public Information Document:

	Non-Whiting Groundfish			Whiting Fishery		
	Ownership	Control	Use by a Vessel	Ownership	Control	Use by a Vessel
Option 1	1%	1%	1%	5%	5%	5%
Option 2	5%	5%	5%	10%	10%	10%
Option 3	10%	10%	10%	25%	25%	25%

The TIQC recommended not adopting an option that would require persons receiving an initial allocation in excess of the caps to divest themselves of the excess.

##### Public Comments:

Include a no-cap option	WCSPA
Consider different caps for different types of owners (e.g. vessels, buyers, communities)	WCSPA
Apply the same caps to all types of owners	1 individual
Caps for processors should take into account any IPQ held (NOTE: applies only if there is IPQ)	1 individual

#### A.4.8 Vertical Integration Limit

The TIQC recommended no limits on vertical integration other than what is provided through the accumulation caps.

Public Comments: None

#### A.5.0 Rollover (Carryover) to a Following Year

Rollover would allow unused quota pounds to be used in a subsequent year.

##### Summary of Options from Public Information Document:

Option 1	No rollover.
Option 2	10% rollover (no rollover allowance for overfished species).
Option 3	20% rollover (5% rollover allowance for overfished species).
Option 4	30% rollover (full rollover allowance for overfished species).

*Question: If quota pounds have been leased out to a vessel how would rollover provisions for overages be applied to quota shares?*

Public Comments: None

### **A.6.0 Use-or-Lose Provisions**

#### Summary of Options from Public Information Document:

Option 1	Include use-or-lose provisions (consider how to treat leases, medical exceptions, and partial use).
Option 2	Do not include use-or-lose provisions.

*Several questions were raised for consideration with respect to use-or-lose provisions:*

- *What portion of the IFQ would have to be used in order for this provision to be applied?*
- *How would it be determined which IFQ had been used and which not used?*
- *How would use-or-lose provisions be applied if part but not all IFQ were transferred from one account to another?*

Public Comments: None

### **A.7.0 Entry Level Opportunities (and Other Loan Programs)**

#### Summary of Options from Public Information Document:

Option 1	Provide a low interest loan program (qualification factors to be determined).
Option 2	Provide an opportunity for new entrants to qualify for shares revoked for program violations (qualification factors to be determined).

The TIQC recommended not considering an auction that would require IFQ holders to give back a small percentage of their IFQ each year for auction, with proceeds from the auction going back to those who gave back the IFQ.

#### Public Comments:

Provide low interest loans for community nonprofits organizations to purchase IFQ	ED
Provide low interest loans for new entrants and younger fishermen to purchase IFQ	Survey (ED)
Allocate to new entrants or provide IFQ for purchase from: IFQ reclaimed from IFQ already distributed, IFQ created from increasing TAC, forced sale in an auction (each year existing IFQ holders would provide a portion of their IFQ for annual auction).	Survey (ED)
Provide low interest loans to assist "lease-dependent" fishermen	Survey (ED)

## A.8.0 Tracking, Monitoring, and Enforcement

### Summary from Public Information Document:

Elements of Tracking Monitoring and Enforcement System	
1.	Onboard compliance monitors (20%-100%)
2.	Dockside compliance monitors (20%-100%)
3.	Hailing requirements
4.	Small vessel exemptions for onboard compliance observers
5.	Video monitoring system
6.	Full retention requirement
7.	Bycatch reporting system
8.	Electronic landings tracking system
9.	Limited delivery ports
10.	Limited delivery sites
11.	Electronic IFQ tracking systems
12.	Vessel monitoring system (VMS)

These elements have been tentatively arrayed into enforcement programs in Table 1.

### Public Comments:

Require VMS and 100% observer coverage - shoreside and at-sea	ED
Analyze limits on number of ports to which deliveries are allowed	WCSPA

## A.9.0 Cost Recovery/Sharing and Rent Extraction

### Summary from Public Information Document:

Elements of Cost Recovery/Sharing Rent Extraction Provisions	
1.	Landings Fee (max of three percent under current Magnuson-Stevens Act).
2.	Privatization of Elements of the Management System: Monitoring IFQ Landings (e.g. industry pays for their own compliance monitors) Fishtickets Stock Assessments

### Public Comments:

An IFQ Program should have discrete and secure funding.	UASC
Include cost recovery provisions with a sliding scale for those that may be disadvantaged by such provisions	ED
Split all or a portion of observer costs evenly between quota holders.	Survey (ED)

## A.10 Penalties

### Summary from Public Information Document:

Elements of Provisions Related to Penalties	
1.	Strong sanctions for violators.
2.	Illegal overages should be forfeited on landings, debited against the IFQ holders account. Additional enforcement action should be taken, as appropriate. Fishing suspended until IFQ has been acquired to cover the overage.

Public Comments: None.

### **A.11 Procedures for Program Performance Monitoring, Review and Revision**

Summary from Public Information Document:

Elements of Provisions Related to Performance Monitoring, Review and Revision	
1.	The program should include a review period, built in performance monitoring, and opportunity for adjustments to the program.
2.	No automatic sunset provisions.

Public Comments:

Consider a range of automatic sunset provisions (1-10 years)	PMCC
Consider sunset provisions with disposal of the quota in a manner that satisfies the public trust.	UASC
Include performance reviews	PMCC

### **A12.0 Data Collection**

Summary Public Information Document: No data collection requirements identified.

Public Comments: None.

### **A13.0 Initial IFQ Allocation**

Details on the IFQ options for initial allocation from the public scoping document are summarized in subsections below. The following are some general comments that did not fit neatly within one of the subsections.

Public Comments:

Establish a control date for processors.	1 individual
Don't make the shares so small that opportunity is reduced below current levels	1 individual

### **A.13.1 ~~Qualifying Criteria: Membership in an Eligible Groups~~**

Summary of Options from Public Information Document:

Option 1	Allocate IFQ to Current Permit Owners.
Option 2	Allocate IFQ to Vessel Owners.
Option 3	Allocate IFQs to Permit-Owners/Vessel-Owners/Processors (consider all combinations allocate to ownership at the time of initial allocation, where relevant).
Option 4	Allocate to High Bidder in Auction (eligibility rules for participation to be developed).

TIQC recommended not adopting options that would give initial allocation to: 1) owners of permit at time of landings; 2) lottery entrants 3); crew/skippers; 4) communities.

For each group for which there is a separate initial allocation formula, an amount of IFQ to be allocated among members of the group will need to be established.

**Public Comments:**

Allocate to processors which are NOT vertically integrated (do not own fishing operations)	1 individual
Allocate 50% to permit owners and 50% to primary processors.	CJC
Allocate to permits, processors (company or facility, to be decided) and communities handling more than 1% of the annual landings	WCSPA
Allocate to permit owners, processors and communities.	CJC
Allocate to skippers who can demonstrate dependence	ED and two individuals
Allocate to crew members	Survey (ED)
Allocate to communities	Survey (ED)
Allocate to processors	Survey (ED)
Do NOT allocate to processors	Survey (ED)

**A.13.2 Qualifying Criteria: Recent Participation Requirement**

Summary of Options from Public Information Document:

Option 1.	No recent participation requirement
Option 2.	Recent participation (1998-2003) required to be eligible for an initial allocation (number of trips and/or number of yrs required, to be specified).
Option 3.	Same as Option 2 but the years would be 2000-2003.

**Public Comments:**

Have a continuing recent participation requirement so that if IFQ are issued they do not go to individuals who have left the fishery.	1 individual
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**A 13.3 Allocation “Formula”: Size of Initial Allocations**

Summary of Options from Public Information Document:

Options for Vessels/Permits	
Option 1.	Auction
Option 2.	Some mix of criteria that might include: <ul style="list-style-type: none"> <li>a. Catch history, wt (for certain species, consider allocating a portion based on an estimate of bycatch).</li> <li>b. Equal sharing               <ul style="list-style-type: none"> <li>i. Equally allocate QS represented by catch history of those vessels/permits bought back among those vessels/permits with catch history for the species.</li> <li>ii. Equally allocate incidental catch species.</li> <li>iii. Some other equal sharing basis.</li> </ul> </li> </ul>
Option 3.	Catch history (wt) only (for certain species, consider allocating a portion based on an estimate of bycatch).

TIQC recommended not adopting and option that would allocate based on vessel length.

Options for Buyers/Processors	
Option 1.	1st receiver purchase history of groundfish trawl landings (lbs)
Option 2.	Auction

Note: Processors may also receive some IFQ based on their ownership of vessels (vertical integration).

*Several determinations are needed to complete the allocation option for buyers/processors based on buying history:*

*Does buying history accrue to a facility or to the company?*

*If buying history accrues to a facility, when ownership changes does it transfer to the new owners, stay with the old owners or not count toward any allocation?*

*If buying history accrues to a company, does it transfer to new owners of the company or “disappear” if ownership changes?*

Public Comments:

Measure catch history by value of product rather than weight of catch	Survey (ED)
Allocate based on an auction	CJC, WCSPA
Allocate based on an auction tiered for different types of operations	ED
Do NOT allocate based on an auction	1 individual

#### **A.13.4 Catch History: Species/Species Groups to be Used for Allocation**

Summary of Options from Public Information Document:

Option 1.	Allocate species IFQ based on relative total groundfish catch.
Option 2.	Allocate species IFQ based on relative catch of each species.

Public Comments: None

#### **A.13.5 Catch History: Allocation Period**

Summary of Options from Public Information Document:

Allocation Period Option	Number of Years in Allocation Period	Number of Worst Years to Drop from Catch History	
		Option A	Option B
Option 1. 1994-2003	10	None	2
Option 2. 1994-1999	6	None	1
Option 3. 2000-2003	4	None	None
Option 4. 1998-2003	6	None	1

Public Comments: None

### A.13.6 Catch History: Combined Permits and Other Exceptional Situations

#### Summary of Options from Public Information Document:

Catch History for Combined Permits	
Option 1.	Consider all catch history of the permits that have been combined to be part of the catch history of the permit resulting from the combination.
Option 2.	The combined permit would have only the catch history associated with its permit number (catch history of other permits with which it has been combined would not accrue to the combined permit).

Other categories of catch to be considered are:

- Illegal catch - do not count toward catch history
- Catch in excess of trip limits, as authorized under an EFP - whether to count needs to be decided
- Compensation fish (fish taken as payment by vessels assisting in research) - whether to count needs to be decided

Public Comments: None

### A.13.7 Initial Issuance Appeals Process

#### Summary of Options from Public Information Document:

No specific recommendations on appeals were identified. The TIQC enforcement group recommended that any proposed revisions to fish tickets under go review by state enforcement personnel prior to finalization of the revisions.

Public Comments: None

### A.14.0 Some Other Possible Provisions

#### Public Comments:

Prohibit highgrading	ED
Incorporate unambiguous language to address concerns about IQs becoming property right.	ED and 1 individual
Develop measurable performance objectives.	ED
Make a policy statement that IFQ program for groundfish trawl should not be considered to set a policy precedent for other sectors of the fishery.	Survey (ED)
Make a statement on the eventual need to address inter-gear transferability of IFQs	Survey (ED)
Crew	
Provide worker protections in the regulations.	Survey (ED)
Withhold 10% of quota from a vessel if a review board finds the vessel is not treating the crew well.	Survey (ED)
Tax quotas to fund crew protections such as unemployment insurance, pensions or health care.	Survey (ED)
Establish a minimum base wage in addition to any percentage based compensation.	Survey (ED)
Establish an outreach program to assist industry refugees in availing themselves to public services and making transitions to other industries.	Survey (ED)
Buyers/Processors	
IFQ shares allocated to processors diminishes over time (e.g. annual % reductions)	Survey (ED)

IFQ processor shares are valid only at the plants for which they are issued.	Survey (ED)
Hold back a percent of IFQ and allocate it annually based on fisher-processor proposals.	ED
Compensate processors through transfer payments at time of initial allocation.	Survey (ED)
Compensate processors through transfer payments on demonstration of stranded capital.	Survey (ED)
Harvesters	
Assign vessel size class endorsements to IFQ and restrict trading between size classes.	Survey (ED)
Require that the IFQ owner be on board the vessel when it is used.	Survey (ED)
Individuals leasing permits get the right of first refusal if the IFQ issued for that permit is sold.	
Local Businesses	
Establish a fund to assist negatively affected businesses or to fund business development.	Survey (ED)
Local Governments	
Establish a revenue sharing system among active groundfish trawl ports	Survey (ED)
Other Fishing Sectors	
Set aside IFQ from TAC increases and allocate it to low impact gears	Survey (ED)
Set aside certain areas for fishing only by non-trawl gears	Survey (ED)
Use a buyback program to offset spillover effects	Survey (ED)
Restrict use of vessels that sell IFQ and leave the fishery (make IFQ allocation contingent on this provision)	Survey (ED)
If a trawler sells IFQ to a fisher in another sector, require that a certain percentage of that IFQ be allocated among all participants in that sector (an increase in the quota for the sector)	Survey (ED)
Take into account disaster tows and increases in participation that exhaust the allocated quota and the resultant necessary adjustments to allocations both within and outside the trawl IFQ fishery.	UASC
Environment	
Set aside IFQ from TAC increases in order to address conservation concerns	Survey (ED)
Combine the IFQ system with marine reserves.	Survey (ED)
Research	
Capture some of the surplus and dedicate it to a fund for research and conservation.	Survey (ED)

## **Impacts to Evaluate**

The following is a list of impacts for evaluation. At the end is a listing of related public comments.

### **Habitat and Ecosystem**

Changing impact on habitat due to gear changes.

Potential changes in ecosystem dynamics if regional or localized depletion occurs.

Potential changes in the mix of species harvested with changes in fishing tactics, seasonality or gear.

Environmental impacts due to economic, community, and resource management changes.

### **Fishery Resources**

Changes in accuracy of total mortality estimates.

- Incentives for unreported highgrading.

- Incentives to under report landings.

- Improved monitoring.

Changes in total mortality.

- Incentives to minimize take of incidental catch species to avoid IFQ costs.

Changes in size and maturity of fish taken.

Direct and indirect impacts on fisheries prosecuted by other gear sectors, including sport.

## **Socioeconomic Environment**

### Production Value - harvesters and processors

- Mix of species and products

- Product quality

- Market timing (special orders)

- Allowable catch (reduced uncertainty about discards with proper monitoring)

### Production Costs - harvesters

- Harvest flexibility

  - opportunity to better scale harvest activities to improve operational efficiency

- Gear flexibility

- Timing flexibility

- Opportunity for more efficient investment in capital

- Asset values (permit and vessel)

### Production Costs - buyers and processors

- Product recovery rates

- Operational planning

- Storage costs

- Opportunity for more efficient investment in capital

- Asset values (facilities)

- Consolidation impacts, loss of infrastructure, and indirect impacts on the businesses (e.g. shifts impacting the operation of existing businesses and their competitiveness)

### Safety and Personal Security

- Vessel maintenance, repair and replacement

- Avoidance of bad weather

- Personal financial and employment security

### Community Impacts

- Local income

- Employment

- Tax base and municipal revenues

- Cost recovery for fishery related public works projects

- Cultural heritage

- Business and infrastructure impacts

### Fairness and Equity

- Effects on groups involved and dependent on the fishery (income and employment) for crew, skippers, vessel owners, processor labor and management, support industries

- Effects on small entities (businesses (including family businesses) local governments, organizations)

- Effects on low income and minority populations

- Effects on asset value (quotas, permits, vessels)

- Effects on adjacent fisheries (geographically adjacent fisheries, for example Alaskan fisheries)

- Effects nontrawl gear fisheries on the West Coast including sport fisheries

Nonconsumptive Values  
     Nonconsumptive Use  
     Existence Value  
 Initial Program Development and Implementation Costs  
 Ongoing Administrative Costs  
 Enforcement and Compliance Monitoring Costs  
 Research and Performance Monitoring Costs

**Impacts to Consider in Addition to Those Listed in Scoping Document**

Evaluate the following

Effects on bycatch ..... UASC, PMCC, PCFFA  
 Effects on habitat ..... UASC  
 Effects on competition in markets ..... 1 Individual  
 Legal and constitutional issues related to CDQs ..... PMCC  
 Impact on Council objective related to year-round seasons ..... PCFFA  
 Impact on fleet rationalization ..... CJC  
 Effects on balance between fishers and processors ..... CJC  
 Geographic distributions of effects ..... POORT, PMCC, ED  
 Effects on future abilities to move to area management ..... PMCC  
 Effects of trawl halibut retention on halibut mortality rates ..... IPHC  
 Ensure the effects on Port Orford are identified separate from other port areas ..... POORT  
 The cumulative analysis should include all recent management changes including  
     buyback and area closures ..... PMCC  
 When considering Non-malleable capital, take into account all fisheries in which the  
     operations participate ..... 1 individual  
 Evaluate the likelihood of investment of capital for conservation of a slow growing and low  
     productivity resource such as those found in the groundfish fishery. .... UASC

TABLE A-1. TIQ Enforcement Group preliminary scoping of possible enforcement programs.

	Program 1	Program 2	Program 3	Program 4	Program 5
<b>At-Sea Monitoring</b>	100% (Compliance Monitors)	100% (Compliance Monitors)	100% (Compliance Monitors or Camera)	Partial Compliance Monitor Coverage	None
Retention Requirement	Full Retention	Discards Allowed	Full if Camera, Discards Allowed if Compliance Monitor Present	Discards Allowed if Compliance Monitors Present	Full Retention (ABC held in reserve)
Bycatch Reporting System Comparable to Landing Tracking System	None	System Needed (electronic)	System Needed (electronic)	System Needed (electronic)	None
<b>Landing Tracking System</b>	Electronic	Electronic	Parallel Electronic Federal System (maintain paper fishtickets)	Parallel Electronic Federal System (maintain paper fishtickets)	Paper Fishticket
Shorebased Monitoring	100%	Monitoring Opportunity (Based on Notice)	Monitoring Opportunity (Based on Notice)	Monitoring Opportunity (Based on Notice)	Monitoring Opportunity (Based on Notice)
Vessel Provides Advance Notice of Landing	Yes	Yes	Yes	Yes	Yes
Limited Landing Locations	Site Licenses	Specified Ports	Site Licenses	Specified Ports	Specified Ports
<b>Electronic IFQ Reporting</b>	Yes	Yes	Yes	Yes	Yes

VMS is an assumed component of the enforcement environment.

Small vessel provision: small vessels may apply for an exemption and carry a camera instead of an compliance monitors.