

SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON
FISHERY MANAGEMENT PLAN AMENDMENT 22:
OPEN ACCESS LICENSE LIMITATION

The Scientific and Statistical Committee (SSC) reviewed the Preliminary Draft Environmental Assessment (EA) for Amendment 22: Conversion of the Open Access Fishery to Federal Permit Management. Mr. LB Boydston gave a presentation to the SSC and answered questions.

The choice of whether to base directed trips on exvessel revenue or landings weight has a relatively small effect on the number of qualifying vessels. However, it is not clear from the EA how the qualification of particular vessels is affected, rather than the aggregate number. It would be informative to know if there are differences in the characteristic of these vessels (e.g., landing ports). The choice of which method to use ultimately depends on the Council's objectives and priorities. The revenue based method is a reasonable way to identify directed trips. It has the advantage of focusing on an economic variable that may be correlated with vessel operator incentives to maximize net-earnings, and thus focuses on vessels that intended to primarily harvest B species for economic reasons.

The EA's economic analysis and discussion of the economic effects is incomplete; and at times appears to be misinterpreted. The EA should address at least two general types of economic effects: net benefits to the nation and regional economic impacts. Although data and models are unlikely to exist for a quantitative analysis, a qualitative analysis can be conducted. Text in the EA that incorrectly assumes revenue is a proxy for community impacts should be revised. Fishing expenditures, rather than revenues, are what determine community impacts. Although total revenue may not change much across the alternatives, fleet expenditures will likely decrease for alternatives with smaller fleets. These impacts may not be uniform across states and ports.

The EA does not comprehensively address whether and to what degree the alternatives meet the stated need for limited entry. Each alternative should have a summary table that describes to what degree it meets each need. One important objective is capacity reduction which does not necessarily correspond to vessel reduction. The SSC notes that matching a correct level of capacity reduction to available harvest is very challenging. It is also difficult to control capacity through license limitation programs.

Alternatives 5 and 6 include length and gear endorsements. A program without a length endorsement will likely be more subject to an escalation of capacity over time. The SSC notes, however, that a length endorsement could make a program with periodic reductions in vessels more complicated since permit sales would need to be matched based on the length endorsement.

The tables in the EA are difficult to follow, and likely will lead to some confusion regarding their information content. Each table should be clearly explained in the document.