SCIENTIFIC AND STATISTICAL COMMITTEE REPORT ON FISHERY MANAGEMENT PLAN AMENDMENT 21: INTERSECTOR ALLOCATION

Mr. John DeVore and Dr. Ed Waters briefed the Scientific and Statistical Committee (SSC) on the Draft Environmental Assessment (DEA) of intersector allocation alternatives. Considerable work has gone into this document to convey the complex implications of each alternative.

The DEA focuses largely on allocation of optimum yield (OY) for species involving significant or dominant utilization by groundfish trawl sectors. For alternatives 1 and 2, allocation is based on recent (2003-2005) catch history and reflects current fishing opportunities as constrained by groundfish rebuilding requirements. For alternative 3, allocation is based on a longer landings history (1995-2005) that is more reflective of historical regulations and fishing conditions.

Catch allocations for the directed non-tribal groundfish trawl sectors are estimated only after set-asides are made for tribal, incidental open access and research catches and – depending on the alternative – a buffer of 0 percent, 5 percent, 15 percent or 25 percent is applied. Comparisons of revenue by sector (Table 4-46, p. 83) largely reflect differences among the alternatives in the size of the buffer and the years used to characterize catch history, as well as differences in ex-vessel prices among sectors. To facilitate identification of sectors and ports most affected by each alternative, it would be helpful to include another version of Table 4-46 that describes relative differences in revenue among the alternatives, standardized to the status quo.

Allocation buffers (if adopted) are intended to reduce the risk of catch overages and to allow for emerging nontrawl fisheries, and should be distinguished from anticipated buffers on annual catch limits (ACLs), which are intended to minimize the risk of exceeding allowable biological catches (ABCs). Allocation buffers involve managing to the OY and may include provisions for in-season release of unused buffer to increase fishing opportunity. By contrast, ACL buffers are intended as precautionary reductions from ABC in computing OY that (by definition) would not be subject to in-season release. An allocation buffer that is set too high or released too late in the season to provide harvest opportunity effectively serves the function of an ACL buffer. ACL buffers may need to be evaluated when National Standard 1 guidelines become available, but are not the focus of this amendment.

Additional elaboration is needed regarding utilization of buffers, including decision rules regarding conditions for release of buffer and allocation of additional yield among fishery sectors. It is important that such decision rules be specified in the DEA to inform deliberations regarding buffer size.

The analysis of alternatives reflects the effects of key constraining stocks on catch and revenue in directed non-tribal groundfish sectors. It would be helpful to include a table in the DEA that describes unutilized portions of OYs under each alternative.

According to Section 4.2.2 (p. 28), the proposed alternatives are expected to have little or no impact on the marine ecosystem. Further elaboration on this conclusion is needed – e.g., the potential for notable changes (positive or negative) in bottom trawl effort.

Economic analysis of the alternatives would ideally include an analysis of net economic benefits and regional economic impacts. Limitations of available data and models – as well as lack of information regarding the specific management measures that would accompany each allocation alternative – preclude a complete economic analysis. Given these constraints, ex-vessel revenues (Table 4-46, Figures 4-1 through 4-8) are a reasonable way to convey the economic effects of the alternatives on commercial harvesters.

The SSC recommends that additional economic analysis be included in the DEA, as follows:

(1) To help evaluate economic effects on communities, estimates of income and employment impacts should be provided for each alternative.

(2) Table 4-41 (p. 75) describes recreational effort and catch of selected species in recent years, as well as how those catches vary among allocation alternatives. It would also be helpful to include projections of recreational effort and expenditures for each alternative. This would require converting the catch estimates to effort estimates (perhaps by assuming that catch-per-unit-effort remains unchanged under each alternative) and applying an estimate of mean expenditure per trip (e.g., from the 2000 angler expenditure survey) to the effort estimate. While simplistic, such projections may nevertheless provide some insight into the differences among the alternatives.

PFMC
04/08/08