

GROUND FISH ADVISORY SUBPANEL REPORT ON
FISHERY MANAGEMENT PLAN AMENDMENT 20 – TRAWL RATIONALIZATION—
ACCUMULATION LIMITS

The Groundfish Advisory Subpanel (GAP) received a presentation from Mr. Jim Seger and Mr. Merrick Burden on species' accumulation limits in the trawl rationalization program and provides the following comments and recommendations.

The GAP believes that the revenue-based approach provided by the Groundfish Management Team (GMT) in Agenda Item G.4.b, GMT Report for considering quota share control limits is a useful conceptual approach for deciding this issue. The GAP also paid attention to the recommendations of the Groundfish Allocation Committee (GAC) in Agenda Item G.4.b, GAC Report and the maximum initial quota share allocations in recommending the control limits for species individual fishing quota (IFQ) shares in Table 1. The maximum landings as a share of trawl allocation was another important consideration.

The GAP recognizes the trade-off between preventing excessive market control of the groundfish fishery with overly high control limits for single entities and the lower revenues and efficiency associated with control limits that are set too low. The GAP also agrees with the GMT that control limits for some species that tend to be targeted by fewer vessels in the fleet should be set relatively higher than those for species that tend to be caught by more vessels in the fleet to allow continuance of these specialized fishing opportunities. For this reason, higher control limits are recommended for species such as Pacific cod and arrowtooth flounder than for more commonly caught species such as sablefish and petrale sole.

The GAP agrees with the GAC recommendation that the Council apply control limits to quota shares and apply vessel use limits to quota pounds. In general, the GAP is recommending vessel use limits that are approximately 1.5 times higher than control limits. This will promote efficiency of fishing operations that will help absorb the higher overhead costs associated with IFQ management (e.g., observer costs borne by permit holders). The GAP felt that using 1.5 instead of the previously discussed factor of 2 for the vessel limit use cap multiplier was appropriate since it would set a larger minimum number of vessels in the fishery. The GAP does recommend slightly higher vessel limits relative to control limits for Pacific cod, arrowtooth flounder, and starry flounder to allow greater access to these species by specialists in the fishery when needed to meet fluctuating market demand or availability of these species for harvest.

The GAP recommends overall market control of the groundfish fishery should be limited by setting an aggregation limit of 2.7 percent on quota shares for non-whiting groundfish species. This recommendation is a mid range of the data presented on page 23 of the GMT report. The GAP agreed there would not be an overall vessel limit because the panel felt the individual species limits will achieve that purpose. Further, the GAP recommends fixing the weighting scheme for calculating the aggregation limit based on the trawl allocation of 2010 optimum yields (OYs) specified for IFQ species. The GAP believes that fixing this weighting scheme for the long term will promote stability and long range business planning much better than a more

dynamic process that contemplates re-calculating the aggregation limit every two years in the biennial management decision process. If the future mix of IFQ species OYs changes to such a degree that the aggregation limit causes excessive market control or other unanticipated problems, then, and only then, should a different weighting scheme be considered.

Species	Vessel use limit	Control limit	Rationale for control limits
Pacific Whiting	15%	10%	Complies w/ GAC recommendation
Lingcod	3.8%	2.50%	Exceeds highest initial allocation and allows growth for the entity
Pacific cod	20%	12%	Exceeds highest initial allocation and allows growth for the entity
Sablefish N	4.5%	3%	Complies w/ GMT recommendation
Sablefish S	15%	10%	Complies w/ GAC recommendation
Chilipepper	15%	10%	Complies w/ GAC and GMT recommendation
Splitnose	15%	10%	Complies w/ GAC and GMT recommendation
Yellowtail	7.5%	5%	Complies w/ GMT recommendation
Shortspine N	9%	6%	Complies w/ GMT recommendation
Shortspine S	9%	6%	Complies w/ GMT recommendation
Longspine N	9%	6%	Complies w/ GMT recommendation
Shelf Rockfish N	7.5%	5%	Doubles the maximum initial allocation and allows growth for the entity
Slope Rockfish N	7.5%	5%	Doubles the maximum initial allocation and allows growth for the entity
Shelf Rockfish S	13.5%	9%	Exceeds highest initial allocation and allows growth for the entity
Slope Rockfish S	13.5%	9%	Exceeds highest initial allocation and allows growth for the entity
Dover sole	3.9%	2.6%	Doubles the maximum initial allocation and allows growth for the entity
English sole	7.5%	5%	Exceeds highest initial allocation and allows growth for the entity
Petrals sole	4.5%	3%	Complies w/ GMT recommendation
Arrowtooth	20%	10%	Complies w/ GMT recommendation
Starry Flounder	30%	15%	Will cover expected landings and market demand
Other Flatfish	15%	10%	Exceeds highest initial allocation and allows growth for the entity
Other Fish	7.5%	5%	Exceeds highest initial allocation and allows growth for the entity

Overfished species

For overfished species, the GAP recommends that control limits be set at the maximum initial allocation of overfished species QS given to any single permit. Vessel limits would be set equal to control limits. Following the GMT approach, the GAP recommends that only the unused pounds in the account would count towards the vessel limit.

Halibut

Consistent with our statement on agenda item G.3, the GAP recommends the Council not move forward with control and vessel limits for halibut IBQ at this time.

Table 2. GAP recommendations together with GMT, GAC and Existing options and other information used to develop the GAP recommendations.

Species Category	Existing Option 1		Existing Option 2		GAC Option 1 ¹		GAC Option 2		GMT	GAP Recommendation ²		Maximums Historic and Initial QS Allocation				
	Vess Lim	Cntrl Lim	Vess Lim	Cntrl Lim	Vess Lim	Cntrl Lim	Vess Lim	Cntrl Lim		Control Limits Identified in GMT Report	GAP Vessel Limit Option	GAP Control Limit Option	Max Annual Share of Trawl Fleet Allocation '04-'06	Max Initial Permit QS Allocations	Max Annual Share of Trawl Fleet Landings	
															'94-'03	'04-'06
Nonwhiting Groundfish Species	3.0%	1.5%	4.4%	2.2%	2.0%	1.0%	3.0%	1.5%	20.0%	None	2.7%	1.8%	1.6%	4.1%	4.9%	
Lingcod - coastwide	10.0%	5.0%	15.0%	7.5%	3.6%	1.8%	4.4%	2.2%		3.8%	2.5%	1.1%	2.2%	9.0%	3.7%	
Pacific Cod	10.0%	5.0%	15.0%	7.5%	12.8%	6.4%	12.0%	6.0%		20.0%	12.0%	7.2%	10.0%	22.7%	21.1%	
Pacific whiting (shoreside)	20.0%	10.0%	22.5%	15.0%	15.0%	10.0%	15.0%	10.0%	3.0%	15.0%	10.0%	6.9%	8.6%	9.1%	7.3%	
Sablefish	4.0%	2.0%	6.0%	3.0%	2.0%	1.0%	3.0%	1.5%		4.5%	3.0%	4.3%	1.4%	2.4%	5.7%	
N. of 36° (Monterey north) S. of 36° (Conception area)	10.0%	5.0%	15.0%	7.5%	20.0%	10.0%	20.0%	10.0%		15.0%	10%	22.0%	15.0%	38.4%	60.3%	
PACIFIC OCEAN PERCH	10.0%	5.0%	15.0%	7.5%	5.4%	2.7%	7.4%	3.7%	10.0%	3.3%	3.3%	3.1%	3.0%	7.3%	10.1%	
WIDOW ROCKFISH	6.8%	3.4%	10.2%	5.1%	9.0%	4.5%	12.0%	6.0%		2.5%	2.5%	6.7%	5.4%	28.7%	31.9%	
CANARY ROCKFISH	10.0%	5.0%	15.0%	7.5%	7.0%	3.5%	7.6%	3.8%		5.2%	5.2%	0.0%	2.8%	12.6%	45.7%	
Chilipepper Rockfish	10.0%	5.0%	15.0%	7.5%	12.4%	6.2%	20.0%	10.0%	10.0%	15.0%	10.0%	0.5%	9.6%	46.8%	26.5%	
BOCACIO	10.0%	5.0%	15.0%	7.5%	20.0%	10.0%	20.0%	10.0%		15.0%	15.0%	0.0%	12.4%	78.9%	53.4%	
Splitnose Rockfish	10.0%	5.0%	15.0%	7.5%	11.4%	5.7%	20.0%	10.0%		10.0%	15.0%	10.0%	8.5%	9.2%	19.9%	26.9%
Yellowtail Rockfish	10.0%	5.0%	15.0%	7.5%	5.6%	2.8%	10.4%	5.2%	5.0%	7.5%	5.0%	0.7%	3.7%	9.9%	11.5%	
Shortspine Thornyhead																
N. of 34°27'	9.6%	4.8%	14.4%	7.2%	2.6%	1.3%	4.4%	2.2%	6%-10%	9.0%	6.0%	4.0%	1.9%	5.0%	8.7%	
S. of 34°27'	9.4%	4.7%	14.2%	7.1%	8.4%	4.2%	17.6%	8.8%		9.0%	6.0%		3.3%	7.0%	16.0%	
Longspine Thornyhead																
N. of 34°27'	4.0%	2.0%	6.0%	3.0%	2.8%	1.4%	4.4%	2.2%	6%-10%	9.0%	6.0%	2.0%	1.3%	2.0%	8.7%	
COWCOD	10.0%	5.0%	15.0%	7.5%	20.0%	10.0%	0.0%	0.0%		20.0%	20.0%	0.0%	44.4%	100.0%	0.0%	
DARKBLOTCHED	10.0%	5.0%	15.0%	7.5%	4.0%	2.0%	6.2%	3.1%	6%-10%	2.0%	2.0%	3.7%	4.4%	15.8%	5.6%	
YELLOWEYE	10.0%	5.0%	15.0%	7.5%	18.8%	9.4%	20.0%	10.0%		5.2%	5.2%	0.0%	6.0%	35.8%	35.5%	
Minor Rockfish North																
Shelf Species	8.0%	4.0%	12.0%	6.0%	5.8%	2.9%	4.4%	2.2%	6%-10%	7.5%	5.0%	3.1%	2.6%	30.6%	49.1%	
Slope Species	10.0%	5.0%	15.0%	7.5%	4.0%	2.0%	6.0%	3.0%		7.5%	5.0%	3.5%	2.4%	11.9%	15.7%	
Minor Rockfish South																
Shelf Species	10.0%	5.0%	15.0%	7.5%	12.2%	6.1%	20.0%	10.0%	6%-10%	13.5%	9.0%	1.7%	7.5%	46.6%	30.9%	
Slope Species	10.0%	5.0%	15.0%	7.5%	11.6%	5.8%	20.0%	10.0%		13.5%	9.0%	12.1%	6.4%	24.8%	21.7%	
Dover sole (total)	3.6%	1.8%	5.4%	2.7%	2.2%	1.1%	3.2%	1.6%	5%+	3.9%	2.6%	5.7%	1.3%	2.0%	5.6%	
English Sole	20.0%	10.0%	30.0%	15.0%	3.0%	1.5%	5.2%	2.6%	5%+	7.5%	5.0%	2.3%	3.5%	13.9%	7.7%	
Petrale Sole	5.8%	2.9%	8.8%	4.4%	2.8%	1.4%	4.6%	2.3%	3%	4.5%	3.0%	5.9%	1.7%	6.2%	8.0%	
Arrowtooth Flounder	10.0%	5.0%	15.0%	7.5%	3.8%	1.9%	6.4%	3.2%	10%+	20.0%	10.0%	8.3%	6.2%	25.5%	19.1%	
Starry Flounder	10.0%	5.0%	15.0%	7.5%	20.0%	10.0%	11.0%	5.5%	10%+	30.0%	15.0%	8.3%	30.5%	65.7%	54.5%	
Other Flatfish	20.0%	10.0%	30.0%	15.0%	2.6%	1.3%	4.0%	2.0%	10%+	15.0%	10.0%	1.6%	9.2%	16.4%	8.1%	
Other Fish	10.0%	5.0%	15.0%	7.5%	5.0%	2.5%	18.0%	9.0%		7.5%	5%	1.5%	3.9%	10.2%	21.3%	

¹ Under the GAC option, the numbers provided for overfished species are for reference only and not part of the GAC option.

² Finer scale method used for calculating maximum control limit for overfished species.