

National Marine Fisheries Service (NMFS) Supplemental Report on Trawl Rationalization Follow-On Actions

NMFS has nine rulemakings and fourteen major activities currently in progress for the groundfish FMP (see Agenda Item E.1.a. NMFS Report 2 for details). Unless directed otherwise by the Council, NMFS will continue to prioritize these ongoing rulemakings and activities, including the trawl gear rule, consideration of changes to EFH/RCAs, the 2019-20 Harvest Specifications and Management Measures, and gear EFPs, etc. The Council may wish to take ongoing activities and constraints under consideration when prioritizing short and long term follow-on actions, given NMFS's limited capacity to take on new, complex rulemaking before the implementation of the 2019-20 Harvest Specifications and management measures. Many of the changes being considered would increase the complexity of the program and may require reprogramming the permit and catch accounting databases, and will require substantial staff time, and likely additional cost-recoverable funding to execute.

NMFS received an advanced draft of the Community Advisory Board's "[Report on a Preliminary Range Of Trawl Catch Share Follow-On Actions](#)". The agency appreciates the opportunity to work with Council partners to identify high-impact areas where we can accelerate priority actions to support increased groundfish harvests and access. Staff have assembled the following broad implementation concerns below. With more detailed information on a range of alternatives for each of the needs identified by the CAB in November, NMFS will continue to advise on the probable level of analytical documentation needed to inform Council action, and the potential relative workload associated with implementing each program change, along with general practical implementation and workload considerations, and feasibility of required analyses within the Council's desired schedule (i.e. selection of preliminary preferred alternatives in April 2018) at this and the November Council meeting.

Meeting the At-Sea Whiting Fishery Bycatch Needs

Between Sector Quota Pound Trading

Alternative Two:

NMFS recommends the Council consider sector-wide caps on transfers to limit negative re-allocative impacts of this rule as part of this alternative, as well as clarifications on when the trading period would be open to each sector and the species being considered for this alternative. This alternative would have substantial recoverable costs associated with implementation in the Vessel Accounting System (VAS), particularly in expanding the system to include the at-sea sectors, that should be considered along with potential benefits of this alternative.

Alternative Three:

NMFS recommends between sector transfers occur at regularly scheduled Council meetings, to maximize the opportunity for public input.

Carryover of At-sea Set Asides

Discussion of this action would benefit from a clarification on how carryover would be implemented, as this would be a different process than the IFQ account system.

Trawl Sablefish Area Management

The purpose and need statement should clarify how changing the area management would reduce costs for fleet. Suggest removing discussion of possible gear conflict until substantiated by analyses.

Alternative 2

NMFS supports a simple reallocation calculation to minimize costs in staff time and vessel accounting system reprogramming required to reissue joint North and South sablefish quota share under this alternative.

Revising Shoreside IFQ Accumulation Limits to Increase Attainment

NMFS suggests including a third alternative, where the Council could consider an aggregate nonwhiting control limit between the sum of the individual species limits (5.84%) and the current limit (2.7%). Without more detail or potential alternatives, we are unable to provide feedback on consideration of changes to individuals species limits at this time.

Meeting Shoreside IFQ Sector Harvest Complex Needs

Enhance the Fleet's Ability to Use Quota Within the Trawl Allocations

Allow Postseason Trading

NMFS advises the council to consider the sequential events that complicate this action: 1) deficits will not be known until catch and discard data are finalized; 2) subsequently, postseason trading must be concluded by some fixed date in order to allow carryover to be executed. This action would likely delay NMFS implementation of carryover each year. Thus, the Council may wish to consider either eliminating carryover, or delaying distribution of carryover until later in the following year with this alternative.

Increase Carry-Over

NMFS requests the Council and advisory bodies clarify how proposed changes to carryover align with our current biennial specifications process.

Change Management Tools for Some Species

NMFS would like the Council to consider potential enforcement concerns with this alternative. This alternative could negatively impact individual accountability mechanisms that are the foundation of the program, and would therefore need a strong justification as to why set-aside management wasn't chosen from the start of the program for overfished species.

Vessel Caps and Risk Pools:

NMFS would like to remind the Council that any consideration of changing caps for risk pools would require direction for how to define risk pools such that the agency could implement different account structures in our vessel accounting system.

Suggested Additional Alternative:

NMFS suggests the Council may wish to consider revisiting the provision which expires all quota pounds not moved to vessel accounts by September 1st. As outlined in the Draft Report presented in June, this provision has resulted in the expiration of millions of quota pounds in the past three years, including nominal amounts of quota for species reported to be constraining to the fleet.

Vessels with Deficits in Excess of Vessel QP Limits (Including Lightning Strike Situations)

Similar to concerns with changing management tools for some species, NMFS suggests the Council and advisory bodies take into consideration potential changes in incentives for fishing behavior, and the subsequent impacts of individuals on the fleet.

Area Restriction Alternative:

This alternative would not address the potential for a vessel or group of vessels with high bycatch events that used up the remainder of the trawl allocation for a species. This alternative is likely to increase enforcement complexity and costs.

Gear Switching

Purpose and Need:

NMFS advises revising the Purpose and Need statement to eliminate any questions, which if included would increase the difficulty for developing analysis of alternatives. NMFS advises that any changes to classification and limiting use of quota pounds would require an overhaul of the vessel accounting system as well as increased enforcement complexity, which would add to the costs of implementing the program. Changes to permit classification, including adding endorsements, would be relatively straightforward and present fewer challenges and costs to implement. The Council may wish to consider whether or not endorsements would be transferable or would not be extended beyond the time that a permit owner permanently leaves the fishery.

Catcher-Processor Sector Accumulation Limits on Permit Ownership and Harvesting/Processing

NMFS believes it is within the Council's discretion to set accumulation limits for the catcher-processor sector and that 303A(h) does not exclude the Catcher-Processor Sector from the requirements of 303A.

AMP Pass-Through

See stand-alone statement Agenda Item E.7.a NMFS Report.