

**COMMUNITY ADVISORY BOARD REPORT ON  
 TRAWL CATCH SHARE REVIEW – FINAL REPORT ADOPTION AND  
 PRELIMINARY RANGE OF ALTERNATIVES FOR FOLLOW-ON ACTIONS**

The Community Advisory Board (CAB) met October 24-25, 2017 in Portland, Oregon, discussed the final catch share review document, and continued work on purpose and need statements and ranges of alternatives for five-year review follow-on actions. Since the Council process for development of a range of alternatives has been extended, the CAB requests that an additional CAB meeting be scheduled prior to the Council adoption of a range of alternatives for analysis next spring. Further, the CAB feels that significant additional discussion is needed to work through issues related to sablefish area management and gear switching. The additional work required is more than can be achieved at a single additional CAB meeting focused on multiple issues. The CAB recommends that the Council authorize an additional CAB meeting or meetings to specifically address the sablefish area management and gear switching issue.

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As noted in its June and September reports, the CAB believes it is critical to expedite completion of actions currently underway in the Council forum or awaiting implementation by the National Marine Fisheries Service (NMFS). These actions include:

- Essential Fish Habitat/Rockfish Conservation Area (EFH/RCA) Revisions
- The Gear Rule
- Exempted Fishing Permits (EFPs) to develop the year-round coast-wide nonwhiting midwater trawl fishery (including within RCAs)

With respect to follow-on actions considered here, the CAB notes that for the following actions there is a need for Council action in the near term. These actions are straightforward and provide relief in the short term.

- Set-aside management for the at-sea whiting sectors
- Relief from lightning strikes

The CAB appreciates the Council's establishment of a September 15, 2017 control date for a moratorium on gear switching and looks forward to continued work on development of alternatives related to this control date.

#### *A. Finalization of the Catch Share Review Document*

The CAB appreciates the improvements made in the catch share review document and focused its attention on a review of Sections 4 and 5 of the catch share review document, as well as the proposed replacement for Section 4.

With respect to the issue of the need for both at-sea and shoreside monitoring, the CAB notes that for whiting and electronic monitoring vessels there is a likely a need to continue with shoreside monitoring because of maximized retention and the absence of an observer for these two groups, respectively. However, for other shoreside vessels it is not clear that duplicate monitoring (at-sea and shoreside) is necessary. The CAB appreciates the NMFS commitment in June 2017 to evaluate ways to reduce observer costs, looks forward to a report next spring, and hopes that the report will include a comparison to other programs around the country where there is individual accountability but not 100 percent at-sea monitoring.

With respect to the need for an additional survey of quota share (QS) owners who are not covered by existing Economic Data Collection program surveys, while this was previously recommended by the CAB, the CAB no longer has a consensus position in support of this survey. Some members of the CAB thought this was not a high enough priority to displace the pursuit of other follow-on actions and questioned the ultimate value of the information. Others thought the collection would be essential to tracking information that is important to understanding the performance of the program, in particular the ownership of QS and flow of benefits of the fishery to individuals who are not members of the fishing communities. It was also suggested that other methods for collecting some of this data be explored. For example, could vessel account owners be required to declare the QS accounts to which their ownership is linked including the percentage of the quota the ownership of the account is linked to?

The CAB agrees with the Groundfish Management Team (GMT) that seven years would be an appropriate duration between reviews. The CAB is concerned that there be sufficient time between reviews to implement follow-on actions and collect data on the performance of the program after

implementation of those actions. Because schedules often get shifted, the CAB did not feel that it was important to time the review process around the biennial specifications cycle.

## ***B. Follow-on Alternatives***

### **1. At-sea Fishery Bycatch Needs**

The CAB reiterates its support for pursuing all five at-sea fishery bycatch need topics that the Council reviewed at the last Council meeting and adds the following with respect to at-sea set aside management: The CAB continues to support permanent establishment of set-asides for all four species (canary rockfish, darkblotched rockfish, Pacific ocean perch and widow rockfish). Set asides should be established during the biennial specifications process and managed as is traditional for other set-aside species. Automatic authority for closing the fishery was included in the previous Council action to establish set-asides for darkblotched and Pacific ocean perch. The CAB does not recommend this be included in future Council recommendations because NMFS always has the discretion to close the fishery for conservation concerns.

If set asides are established during the biennial specifications process, rather than based on the formulas that were adopted in Amendment 21, there would no longer be a need to address within trawl allocations for these species.

### **2. Trawl Sablefish Area Management and Gear Switching**

Based on its understanding of the fishery and biology of the stock, the CAB reached a consensus recommendation on the following purpose and need statement:

**Proposed Purpose and Need:** Action is needed to allow the shorebased trawl sector to reduce costs and more fully harvest its allocation to the benefit of industry (harvesters and processors), communities, and consumers. Currently, the trawl southern sablefish allocation is going largely unharvested while the northern sablefish allocation is nearly fully harvested. At the same time, the analysis shows that the amount of sablefish quota pounds (QP) available in the north is one of the factors limiting the harvest of multispecies complexes of which sablefish is a part. There is not a biogeographic break in the sablefish stock structure that requires a management boundary at 36° N. latitude. The trawl sablefish in the south is being harvested primarily by vessels using fixed gear (vessels gear switching) that travel down from the north. The purpose of this action would be to create a coastwide sablefish allocation for the trawl sector and/or limit gear switching.

There are participants on the CAB that question whether gear switching is the cause of the lack of availability of sablefish to the trawl fishery in the north.

The CAB reviewed numerous approaches for addressing the gear switching issue and recommends further development of the alternatives provided as attachments in the appendix to this report.

Principles on which the CAB is in agreement:

- We want to get more sablefish to the trawl fleet.
- We want to consider existing operations/investments.
- We believe that unlimited catch of sablefish through gear switching is not desirable.

Regional difference in fishing practices and markets may add complexity to the solutions.

### **3. Shorebased Individual Fishing Quota (IFQ) Accumulation Limits**

The CAB supports increasing the individual species annual vessel QP limits where the trawl allocation is significantly under attained and full attainment of the annual limit is being achieved by some vessels (see Table 3-7 of the [catch share review document](#)) and for species in the south, where it is not mathematically likely that the number of vessels operating in an area will be able to take the full allocation. Examples, include: shortspine thornyheads south, lingcod north, cowcod, Dover sole, slope rockfish south and shelf rockfish south. As the Council considers changing these limits, it should keep in mind that situations will be changing and there may be unintended consequences. For example, the fleet's ability to attain the available lingcod allocations may change with increasing allocations of yelloweye and rockfish conservation area re-openings.

The CAB continues to support elimination of the daily limit and looks forward to receiving analysis and information on the aggregate nonwhiting control limits that will allow it to further develop alternatives. One issue in particular that should be considered in that analysis is whether or not the aggregate limits are a cause of under attainment of the allocation of some individual species.

### **4. Shorebased IFQ Sector Harvest Complex Needs**

#### **a. Enhance Fleet's Ability to Use Quota Within the Trawl Allocation**

The CAB reviewed alternatives related to fleet's ability to use its allocation and continues to support all the existing alternatives.

Alternatives on raising annual vessel QP limits to enhance attainment of trawl allocations need further development; however, this issue is also being addressed separately under the previous item. The CAB will wait for the outcome of the November Council direction on management measures before proceeding with further development of alternatives.

While the CAB has recommended that the carryover be increased to as much as 100 percent, for purpose of developing a range of alternatives, the CAB recommends an alternative be included that would increase the carryover to 30 percent. This recommendation is based on the use of a 30 percent carryover in BC, and the success of that program, and is contingent on an evaluation of whether it would be appropriate for this program.

#### **b. Vessels with Deficits in Excess of Vessel QP Limits**

The CAB reviewed the existing alternatives and recommends the Council include the following clarification and additional suboption as part of the range of alternatives (insertions underlined).

**Vessel Constraint Alternative 1: Status quo.**

**Vessel Constraint Alternative 2: Relief from QP limits:** After the end of the year, all vessels with deficits in their account would be allowed to buy previous year QP to cover

their deficit, up through a certain date. In covering their previous year deficits, vessels would not be limited by the annual vessel QP use limits for all species.

**Suboption A:** In covering their previous year deficits, vessels would not be limited by the annual vessel QP use limits for certain non-target species. [This replaces second sentence in main alternative]

**Suboption B:** If the deficits are not covered by that certain date, NMFS would also convert unused QP not eligible for carryover from the previous year (for example QP in excess of individual vessel account carryover limits) and/or unfinished amounts from the previous year's ACLs and sell the QP to trawl sector vessels that are in deficit, up to the amount of that deficit.

**Suboption B-1:** Limit the NMFS sale to non-target species.

**Suboption B-2:** Set the NMFS sale price to above market rate.

**Suboption B-3:** When there are more deficits than there are QP available . . . [develop suboption(s) to handle this situation. An auction might be one option or distributing equally or pro rata to vessels with deficits might be another.]

If QP are sold by NMFS, proceeds should go to offsetting cost recovery fees.

## 5. Catcher-Processor Permit and Processing Limits

The CAB maintains its opinion that further action on catcher-processor (CP) permit and processing limits is unnecessary. The CAB continues to be concerned that moving this item forward unnecessarily burdens already limited staff, resources, and funding that would be better used to address problems currently hindering other fishery sectors from achieving full benefits from the rationalization program.

Moreover, in the National Oceanic and Atmospheric Administration guidance document, The Design and Use of Limited Access Privilege Programs, the authors state “[c]aps on ownership, or even limiting the ability to use more than a certain amount of quota on one boat (even if the shares are owned by different individuals) can be a direct barrier to such efficiencies and this can result in significant economic losses.” This point is critical to the Council’s consideration of control and usage limits in general (as exemplified by the review and reconsideration of several of the control limits established for the shoreside catch shares program). It should also be heeded as the Council considers developing new limits for the CP sector.

However, the CAB recognizes the Council has initiated the process to consider developing limits and is scheduled to adopt an initial range of alternatives at the November 2017 meeting. With that in mind, **if the Council decides to move forward** with developing options, the CAB recommends that the options for initial action include the following:

1. Development of permit and processing limits for the CP sector
  - 1.a. No Action
  - 1.b. Apply limits to the existing cooperative program
  - 1.c. Apply limits only if the CoOp dissolves and IFQ program is implemented for the CP sector

This overarching question should be addressed first and include consideration of the fundamental need for permit and/or processing limits, as well as consideration of what “excessive share” means in the context of the CP sector of the whiting fishery. The suboptions highlight the distinction between the current cooperative, a stable entity with a 20-year history, versus the CP sector under IFQ management that would occur if the cooperative dissolves.

## 2. Limits on CP Permit Ownership

- 2.a. No Action (allow ownership up to ten permits)
- 2.b. Limit CP permit ownership to five permits
- 2.c. Limit CP permit ownership to seven permits

The rationale for setting the lowest limit at five permits is in recognition of the status quo where one CP company holds five permits. The higher limits would provide an adequate analytical contrast to inform Council consideration of this issue.

## 3. Limits on CP Sector Processing

- 3.a. No Action (allow a company to process 100 percent of the CP sector allocation)
- 3.b. Limit CP processing by a single company to 60 percent of the CP sector allocation
- 3.c. Limit CP processing by a single company to 80 percent of the CP sector allocation

The rationale for setting the lowest limit at 60 percent is that over the 20-year history of the Pacific Whiting Conservation Cooperative harvest sharing agreement one CP company has regularly harvested more than 50 percent of the CP sector allocation. The higher processing limits would provide an adequate analytical contrast to inform Council consideration of this issue.

If the Council accepts the CAB recommendation to not move further with this issue, the CAB recommends that the Council publish a *Federal Register* notice to vacate the June 13, 2017 control date, for the purpose of maintaining veracity of other control dates that the Council has or may wish to establish in the future.

## **6. Adaptive Management Plan QP Pass-Through**

As in its previous report, the CAB supports continuing the adaptive management plan (AMP) pass-through until such time as the pass-through is modified but also wishes to see a final resolution of the AMP quota disposition. Some members support ending the AMP program in order to end uncertainty about the ongoing disposition of the AMP quota while others would like to see the development of alternative criteria for its distribution. However, final resolution is not a higher priority than other issues follow-on action issues the Council has prioritized.

PFMC  
11/07/17

## *Appendix – Draft Alternatives for Sablefish Area Management and Gear Switching*

The alternatives provided in this appendix were developed by individual members of the CAB, often after extensive consultation with other members, but have not yet been discussed in detail by the CAB. They are not presented in any particular order of priority.

### **Proposal A – Gear Switching Permit Endorsement – Landings Capped at Annual Vessel QP Limit**

**CONCEPT:** Establish a gear switching endorsement that would be attached to a trawl permit and required for gear switching in the shorebased IFQ fishery. The endorsement would transfer with the trawl permit.

**Qualification:** The endorsement would be issued for any trawl permit with which non-trawl gear was used to harvest shoreside IFQ prior to September 15, 2017.

**Qualified Permit Privileges/Restrictions:** Status quo. The amount of groundfish a gear-switching endorsed vessel could catch with nontrawl gears would be limited only by existing annual vessel QP limits.

**Non-qualified Permits Restrictions:** Vessels with trawl permits that do not have a gear switching endorsement would not have the option to gear switch.

### **Proposal B – Gear Switching Permit Endorsement – Landings Capped Based on Permit History**

**CONCEPT:** Establish a gear endorsement for fixed gear [gear-switching] on the trawl permit. There's precedent for this—for example, limited entry trawl permits are already endorsed for trawl gear, and adding fixed gear to the permit can be done relatively easily and inexpensively. NMFS has indicated that an endorsement on a permit is easier to do and is far less expensive and/or complicated than trying to assign a percentage of quota share that could be caught with fixed gear or limited to trawl.

**Qualification:** Establish a threshold of participation for a permit to qualify for a gear endorsement i.e. 70,000 pounds in any one, two, or three years during 2011-2017 or a total of 250,000 pounds from 2011-2017. The intent is to include those fishermen with significant investment and participation in the fishery. (The poundage in this example is for illustration only; it would be based on a percent of the total quota).

#### **Qualified Permit Privileges/Restrictions:**

1. A trawl permit that qualifies for a fixed gear (FG) endorsement would continue to be able to land up to the maximum of any one year's landings. In other words, if the maximum pounds of sablefish you've landed is 100,000 pounds in any one year during 2011-2017, that would be the poundage limitation on your FG endorsed permit. Stacking of permits would also be allowed, up to a vessel cap.

2. A trawl permit endorsed for FG can continue to lease sablefish from trawl fishermen, up to their maximum catch of any previous year. For example: If you own 20,000 pounds of sablefish quota but have leased 90,000 additional pounds, and that is the most you have ever landed in one year of the program, you can continue to lease up to the maximum of any one year's landings.
3. A trawl permit endorsed with FG can be leased to a trawler who wishes to newly start fishing with FG, but a limit on the total pounds allowed to be fished with FG would still be the maximum poundage in any one year that qualified the original permit for the FG endorsement.

### **Proposal C – Gear Switching Permit Endorsement – Individual Vessel Landings Capped at 70 Percent of the Annual Vessel QP Limit**

**CONCEPT:** Use the control date (September 15, 2017) to accommodate current participation, along with a minimum catch requirement during a window to demonstrate significant participation in the fishery.

**Southern Sablefish Quota:** Allow southern sablefish quota to be used in the north but only by trawl gear. This will add a significant amount of sablefish to the trawl sector.

**Qualification (Same as Proposal B):** Establish a threshold of participation for a permit to qualify for a gear endorsement i.e. 70,000 pounds in any one, two, or three years during 2011-2017 or a total of 250,000 pounds from 2011-2017.

**Qualified Permit Privileges/Restrictions:** Only allow 70% of a vessel cap to be harvested with fixed gear. Any remainder of the vessel cap needs to be harvested with trawl gear. Rationale – This accommodates fixed gear participation while providing additional sablefish to the trawl sector.

**Non-Qualified Permit Privileges/Restrictions:** Gear switching would not be allowed for vessels that do not qualify for an endorsement.

The trawl permitted fishermen on the GAP using fixed gear offer the following general comments to the trawl alternatives under gear switching. Trawl permitted fishermen using nets for the last 7 years have sold and leased their quota shares, including sablefish, to many entities. Their alternatives that now include "caps" are designed to diminish those same fishing use privileges, in order to limit and exclude trawl permitted fishermen using fixed gear. Any "cap" on landings of trawl IQ fish by fixed gear will create a race for fish, and also decrease the value of the trawl permits and quota share fished by trawl-permitted fishermen using fixed gear.



**Proposal D – Fixed Gear QP Cap with Active Trawler Designation and Exemption**  
*(alternative #5 from September 2017 GAP Statement)*

**CONCEPT:** Each year, designate a proportion of the annually issued QP as trawl only and a portion as trawl or fixed gear eligible. Only vessels designated as active trawlers in IFQ catch shares are allowed to participate in gear switching (and those eligible for an exemption to this requirement).

**Fixed Gear QP Cap -- Plan Framework:** First, set a fixed gear attainment aggregate cap percentage; for example, 20 percent. 80 percent of quota pounds will be designated as trawl only. The other 20 percent fixed gear eligible, but can be harvested with trawl gear. Next, every year, all QS owners receive 20 percent of their sablefish QP as fixed gear eligible and 80 percent trawl only. For those who want to harvest more than 20 percent of their quota with fixed gear, they can trade with others and acquire up to the vessel limit.

Taper: A seven year taper could also be used with this alternative. Start at a 28% cap and taper down 2 percent a year to 16 percent.

**Qualification - Active Trawler:** To be designated an active trawler in a given year, a vessel will have a bottom trawl declared catch of total IFQ groundfish species exceeding a certain amount; for example, 100,000 lbs. There could be species not counted towards that 100,000 lbs, such as primarily mid-water caught species and sablefish itself.

**Qualification - Active Trawler Exemption:** Vessels that have participated in IFQ gear switching to this point would receive an exemption from the active trawler requirement. The exemption remains until a majority of vessel ownership permanently leaves the fishery.

**Qualified Vessel Privileges/Restrictions:** Eligible to gear switch using pounds designated for trawl or fixed gear. Qualified vessels could fish up to the annual vessel QP limit.

A modification that could be added on to this method would be adding a benefit to entities that own quota and have fished fixed gear:

- . 1) Start with the base idea of every year that every quota share holder gets the same percentage (15%) of their sable quota as fixed gear eligible quota pounds and the remainder as trawl only pounds. Then people can trade and lease the two types of quota as they see fit.
- . 2) Use the previously set control date for purposes of sable quota ownership and fixed gear participation for the following:
  - . a) For quota share owners whose vessel averaged catching at least half of their owned quota share amount (as of control date ownership) with fixed gear (2011-2016), they get 50% of their sablefish quota pounds each year in fixed gear eligible quota pounds and the rest in trawl only quota pounds.
  - . b) This is only for the quota share they owned on the control date. This does not apply to quota share purchased after the control date.

- c) This benefit is not transferable. Once a majority of the vessel ownership leaves the fishery, the benefit goes away, and the amount of yearly sablefish fixed gear eligible percentage quota pounds then becomes the same amount as everybody else (15%).
- 3) This option does the three things that different groups have wanted:
  - a) Limits fixed gear catch
  - b) Keeps the gear switching option for all trawlers
  - c) Gives a benefit to those that have owned quota share and fished fixed gear, for as long as they stay in the fishery.

**Proposal E –Trawl Only Harvest of Southern Sablefish Quota in the North and Vessel Based Allowances/Restrictions for Gear Switching**

**CONCEPT:** increase trawl access to sablefish and limit QP for harvest with non-trawl gear (leave 36 line North Latitude)

**Increase access to sablefish n QP for harvest with trawl gear:** Allow Sablefish South to QP to be harvested with TRAWL GEAR ONLY North of 36 N.

**Limit QP available for harvest with non-trawl gear (gear switching):** Except for qualified vessels, establish new non-trawl only vessel limits for Sablefish North QP that is linked to ownership of QS.

**Qualification:**

To qualify, the vessel must have landed a minimum amount of Sablefish North QP using non-trawl gear prior to 09/15/17 (control date). ie: Vessels that have landed 100,000 lbs or more of Sablefish North QP in the IFQ program using non-trawl gear prior to 09/15/17 (control date) are qualified to continue to harvest up to a standard vessel cap using non-trawl gear. (See Example 1)

**Qualified Vessel Privileges/Restrictions:** Status quo. Continue to harvest up to a standard vessel cap using non-trawl gear (the existing vessel limit of Sablefish North QP of 4.5%--equivalent of 239,726 pounds under the 2017 shorebased trawl allocation.

**Non-Qualified Vessel Restrictions (Sablefish North Opportunities):**

**Vessels Owners that Own QS Prior to September 15, 2017**

New Vessel Limit/Cap of QP Available for harvest with Non-Trawl Gear only tied to QS Ownership: Establish a new non-trawl gear only vessel limit of 200% of QS owned for vessel owners who owned Sablefish North quota shares (of at least 0.15%) as of 9/15/17 (control date) and can prove common ownership between the vessel and QS. Vessel will be limited to this new cap for harvest with non-trawl gear, but can harvest additional

pounds up to an existing vessel cap of 4.5% of Sablefish N using trawl gear and can harvest Sablefish S. North of 36 line. (See Example 2)

**Vessel Owners that Do Not Own Sablefish North QS Prior to September 15, 2017**

New Vessel Limit for QP Available for harvest with Non-Trawl Gear for New- Entrants: Establish a new non-trawl gear-only vessel limit for Sablefish North QP of 0.3% (equivalent of 15,000 pounds under the 2017 shorebased trawl allocation) for vessels that do not meet qualifications and do not own QS.. (See Example 3)

## NOTES ON THIS CONCEPT:

- The three areas of this concept (Qualification, restriction and increased availability to trawl QP) need to remain coupled.
- Specific numbers used in this concept for qualification criteria and vessel cap limits (100,000 lb landed, .15% Ownership criteria, 200% of QS owned and .03% for new entrant vessel caps) are starting points for discussion. These numbers may require further discussion at the CAB and may be refined or have additional options added for analysis.
- Vessel Accounts and QS Accounts need to be linked to allow for data collection. While this link will not provide a full picture of QP leasing, it will provide some visibility to help begin to understand how much QP is being harvested by QS owners and how much is not. Suggest that this is done as soon as possible regardless of if this ultimately becomes mechanism for Gear Switch restrictions.
- This concept uses the term “vessel” and not LE Permit. LE Permits can move from vessel to vessel. When analyzing data for qualification criteria it might be necessary to look not only at permits but also at vessels and possibly fishermen to accurately reflect operations that have been active on the water using non-trawl gear.
- This concept suggests additional questions be added to the Vessel Account Renewal process, which currently must be completed annually between 10/1 and 11/30 for every Vessel Account:
  - **New Question 1-** Is this Vessel linked to a QS account with the same owner?
    - If Yes, Vessel will be asked to link to QS Account (drop down menu)
    - If Yes, Vessel will be asked what % of the QS owned is assigned to this vessel (in the case of one QS owner also owning more than 1 vessel)
    - If NO- No change and renewal continues.
  - **New Question 2-** Is this Vessel going to harvest Sablefish North QP with Non-Trawl Gear?
    - If Yes, Move to New Question 3
    - If No, no change and renewal continues
  - **New Question 3-** Does this vessel meet the criteria for a Gear Switch Qualification?
    - If Yes, answer will be verified and no change
    - If NO- New Vessel Cap of 200% of owned QP or New Entrant 0.3% whichever is greater is established for this vessel.
- This concept suggests 3 different vessel caps for one species and one gear type only-Sablefish North QP harvested with nontrawl gear, all other vessel caps to remain the same.
  - Regular Vessel Cap 4.5% of TAC for qualified gear switch vessels
  - 200% of QP associated with Owned QS for non-qualified owners
  - 0.3% of TAC for “new entrants”
- No Restrictions on Trawl Existing Sablefish North Vessel Cap of 4.5% can be harvested by vessels using trawl gear and QP harvested can be Sablefish North QP OR Sablefish South QP...any vessel regardless of Gear Switch qualification can harvest Sablefish with trawl gear.

Examples using 2017 Quota Calculations:

**Example 1: Qualified Gear Switch Vessels:** (Current Gear Switch Participants that meet Gear Switch qualification criteria)

New Question 1:		Is this Vessel linked to a QS account with the same owner?					
	YES	Link to QS ACCCOUNT (drop down menu)		YES or NO			
	IF YES	What % of the QS owned is assigned to this vessel?		xx%			
	NO	No change					
New Question 2:		Is this Vessel going to harvest Sablefish North with Non-Trawl Gear?					YES
	YES	Move to Question 3					
	NO	No Change- Skip Question 3					
New Question 3:		Does this vessel qualify for Gear Switching ?					YES
	YES	System verifies and then no change					
	NO	Limit of non-owned QP to be harvested with non-trawl gear is 2X ownership					
Vessel Cap	Vessel Cap QP 2017	Ownership Amount	Ownership QP 2017	QP Transferred in from Linked QS Account/QP Owned (aa)	Limit of non-owned QP Transferred in for harvest with non-trawl gear (same as amount owned) (bb)	Non-Trawl QP limit: standard vessel cap (cc=aa+bb)	Trawl Gear QP Available: (Can be North or South QP) (=Vessel Cap-cc)
4.50%	239726	1.50%	79909	79909	159817	239726	0

- This example is for Non-Trawl gear only: Gear Switch Qualified vessels can also choose to fish using trawl gear.

**Example 2: Quota Share Owner that does NOT meet Gear Switch Qualification criteria:** (Current Trawl Participants that own QS and want to gear switch)

<p>New Question 1: Is this Vessel linked to a QS account with the same owner?                  YES Link to QS ACCOUNT (drop down menu) <b>YES</b>                  IF YES What % of the QS owned is assigned to this vessel? <b>100%</b>                  NO No change</p>							
<p>New Question 2: Is this Vessel going to harvest Sabelfish North with Non-Trawl Gear? <b>YES</b>                  YES Move to Question 3                  NO No Change- Skip Question 3</p>							
<p>New Question 3: Does this vessel qualify for Gear Switching ? <b>NO</b>                  YES System verifies and then no change                  NO Limit of non-owned QP to be harvested with fixed gear is 2X ownership</p>							
Vessel Cap	Vessel Cap QP	Ownership Amount	Ownership QP 2017	QP Transferred in from Linked QS Account/QP Owned (aa)	Limit of non-owned QP Transferred in for harvest with non-trawl gear (same as amount owned) (bb)	<b>Non-Trawl Gear QP limit:</b> 200% of ownership (cc=aa+bb)	<b>Trawl Gear QP Available:</b> (Can be North or South QP) (=Vessel Cap-cc)
4.50%	239726	1.50%	79909	79909	79909	159818	79908

**Example 3: Non Quota Share Owner that does NOT meet Gear Switch Qualification criteria:** (New Entrant that does not own QS and wants to gear switch)

New Question 1:		Is this Vessel linked to a QS account with the same owner?					
		YES	Link to QS ACCCOUNT (drop down menu)	NO			
		IF YES	What % of the QS owned is assigned to this vessel?	n/a			
		NO	No change				
New Question 2:		Is this Vessel going to harvest Sabelfish North with Non-Trawl Gear?		YES			
		YES	Move to Question 3				
		NO	No Change- Skip Question 3				
New Question 3:		Does this vessel qualify for Gear Switching ?		NO			
		YES	System verifies and then no change				
		NO	Limit of non-owned QP to be harvested with fixed gear is 2X ownership				
Vessel Cap	Vessel Cap QP	Ownership Amount	Ownership QP 2017	QP Transferred in from Linked QS Account/QP Owned (aa)	Limit of non-owned QP Transferred in for harvest with non-trawl gear (same as amount owned) (bb)	Non-Trawl Gear QP limit: .30% of TAC (cc=aa+bb)	Trawl Gear QP Available: (Can be North or South QP) (=Vessel Cap-cc)
4.50%	239726	0.00%	0	0	0	15712	224,014

## **Proposal F – Eliminate 36° N Line for Trawl, Reserve Quota for Trawl, Moratorium on New Gear Switching Vessels**

Eliminate and mitigate.

1. Eliminate the 36 line for trawl sablefish.
  - Economic benefits resulting from more access to sablefish through a coast-wide allocation.
  - Agency workload reduced and program efficiencies gained.
2. Reserve quota for trawl operations.
  - Reserving quota for trawl operations will increase the opportunity to reach higher attainment of abundant yet under utilized species.
  - Increase net economic benefit to fishermen, processors and community.
3. Create a time-bound moratorium to limit new vessels from gear switching (moratorium from control date to xxxx, or, xxxx years).
  - Fixed gear operations are limited to vessels linked to a vessel account with trawl or fixed gear landings between 2011 and the control date.
    - Moratorium affects vessels - there are far fewer vessels to manage than there are permits.
    - Addresses the concern of new boats coming down from Alaska or new local boats pouring in if more sablefish is made available through a coast-wide allocation.
    - Preserves the opportunity of existing operations currently participating in the IFQ. This is critical to California where access to fishery resources is very limited. Fishermen, processors, and communities in small California ports will continue receiving economic benefit, opportunity and future opportunity post-moratorium.
    - There is not enough current analysis to understand the effects of gear switching, and therefore, any changes should be made purposefully; achieving parity throughout the industry.