

SUMMARY TABLE OF ALTERNATIVES

Alternatives - General Approaches

The following are some of the central elements of gear switching limitation alternatives that have been proposed thus far. They have been proposed in various combinations and with other elaborations; and none of the following represents a complete alternative.

1. Permit Endorsement/Vessel Designation Approaches
 - a. Require a gear switching endorsement for a vessel or the vessel permit (necessary for vessels to continue gear switching at a higher level than allowed for vessels without endorsements)
 - b. Designate “active trawlers” on an annual basis (active trawlers would have an opportunity to gear switch not provided to other vessels, and exemption would be provided for vessels with gear-switching history)
2. Quota Designation Approaches
 - a. Each year allocate sablefish quota pounds (QP) as either “any gear” or “trawl only”
 - b. Designate some quota shares (QS) as “any gear” and other as “trawl only”
3. Cap on Gear Use Approach

Limit the amount of gear switching that can be done by any one vessel/permit in a year (e.g. an annual vessel QP limit for gear switching that would be less than the annual vessel QP limit for sablefish).

Variations on proposals for addressing under-attainment of sablefish harvest south of 36° (or increasing the amount of sablefish available in the north) appear to fall into the following categories.

1. Elimination of the 36° N. lat. for the trawl sector sablefish (creating coastwide sablefish QS).
2. Allowing south of 36° sablefish to be caught to the north (coastwide or up to some northern boundary, and possibly limited to use of trawl gear when caught in the north).
3. Increasing the proportion of the coastwide sablefish allocated to the northern area.

A summary of the central elements of alternatives developed by the SaMTAAC (alternatives labeled S-#), Community Advisory Board (CAB), Council, and Groundfish Advisory Subpanel (GAP) is provided in Table 1.

Table 1. Central elements of the options for limiting gear switching (see description of proposals for complete details).

	Limit Number of Gear Switchers		Cap Amount of Gear Switching by an Entity (Cap Not Associated with a Quota Designation)	Quota Designation (Cap Fleet Gear Switching by Designating Quota as Trawl Only or Any Gear)	Control Date ⁱ and Other Elements
SaMTAAC Alternatives					
S-1	Default would give every vessel “any-gear” and trawl-only QP. Vessels/permits might be able to opt-out and receive all QP as “any-gear,” preserving full opportunity to gear switch (possible qualification criteria for opting out).			Allocate “trawl” and “any-gear” QP to vessels/permits that have not opted out (proportion to be determined). All QP converts to “any-gear” on Sept 1.	
S-2					Move 36° line to 42° for trawl sector and reallocate QS using pre-established formula for such a change.
S-3					Move a portion of the trawl sector allocation from south to north (i.e. increase the proportion of coastwide sablefish allocated to the north)
S-4					Allow Southern QP to be Harvested as Far North as 42° N

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	Grandfather Existing Gear Switchers (Permit, Vessel, or Ownership Based).	Active Trawler Designation (Applies to Vessels)			
S-5	Fixed gear participation history exemption: vessels whose owners do not own QS qualify based on history of vessel landings. Fixed gear participation history and QS ownership history exemption: vessel owners with QS qualify based on that ownership (majority ownership rule) and vessel history of gear-switched landings.		Each vessel's limit is the greater of previous year trawl catch (maximum of 1.5%), a limit for vessels with a fixed gear participation history exemption (starting at 1.5%, phases out over 6 years), or a limit for those with fixed gear participation history and QS ownership exemption (maximum of 2.6%). These limits will be adjusted annually to keep fleet within an aggregate fleet gear switching limit. The aggregate fleet limit starts at 25% and phases down to 15%.		Control Date
S-6	Person receives a gear switching exemption based on owning an LE permit and trawl QS continuously since control date and having used that permit and QS to gear switch prior to the control date.				Control Date
S-7					As a 5-7 year experiment, designate southern QP as: 1/3 southern only (restricted to south of 36°); 1/3 central/southern CA (restricted to south of 40° 10'); 1/3 coastwide (no restrictions)

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	Grandfather Existing Gear Switchers (Permit, Vessel, or Ownership Based).	Active Trawler Designation (Applies to Vessels)			
S-8 (Somer, combination of CAB-B, CAB-D, S-5 plus sunset option).	Vessels could qualify for a gear switching exemption based on gear switching history prior to control date. The vessel exemption is: Opt 1, nontransferable. Opt 2, transferable one time. Opt 3, transfers with the vessel until it leave the trawl fishery.	Vessels meeting a qualifying requirement would receive an "Active Trawler Designation"	Annual vessel gear switching limit for active trawlers and exempted vessels (e.g. 1.5%). Exempted vessel limit: Opt 1: maximum percent of allocation gears switched up to control date; Opt 2, some proportion of the outcome from Opt 1 (e.g. 80%). Sunset Options Sunset Opt 1, No sunset. Sunset Opt 2, (exempted vessels only): Subopt a, taper the gear switching limits down to zero in year 10. Subopt b, end the limit in year 10 (no taper) Sunset. Opt 3 (exempted and active trawl vessels): (same suboptions as Opt 1).		Control date
S-9 (Dooley, new alt)	Vessels could qualify for a gear switching exemption based on gear switching history prior to control date (north of 36°). Consider limits on transferability.	Vessels meeting a qualifying requirement would receive an "Active Trawler Designation"	Annual vessel gear switching limit for active trawlers is Opt 1: Number of sablefish lbs trawled in previous year. Opt 2: Some constant value (same for all active trawlers) Annual vessel gear switching limit for exempt vessels: Opt 1, Highest annual lbs prior to control date. Opt 2, Average annual lbs prior to control date. Opt 3, Opt 1 or 2 reduced by some percent Also consider a sunset. Annual limit might be expressed as a percent of the annual vessel QP cap with an upper limit.		Opt 1, Status quo south of 36° line. Opt 2, Allow a percent of southern QP to be fished north to 42° with trawl gear (percent based on unused southern allocation plus previous year usage of southern pounds in the north). Variations: Limit allow coastwide use. Reduce the percent allowed to go north.

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	Grandfather Existing Gear Switchers (Permit, Vessel, or Ownership Based).	Active Trawler Designation (Applies to Vessels)			
CAB - Proposal A	Qualify trawl limited entry permit (LEP) for a gear switching endorsement (GSE) based on gear switching history.	No	Annual vessel QP limit for vessels with a GSE LEP ⁱⁱ No gear switching for non-qualified entities	No	Control Date
CAB - Proposal B	Qualify LEP for GSE based on gear switching history.	No	Limit each GSE LEP to its maximum historic catch, transferable with the permit (poundage or QS percent) ⁱⁱⁱ No gear switching for non-qualified entities.	No	Control Date
CAB - Proposal C	Qualify LEP for GSE based on gear switching history.	No	70 % of the annual vessel QP limit for vessels with a GSE LEP. No gear switching for non-qualified entities.		Control Date Allow southern sablefish quota to be fished north of 36° N. Lat. but only with trawl gear.
CAB - Proposal D	Vessels meeting a qualifying requirement would receive an "Active Trawler Designation" that continues until 50% of the vessel's ownership changes.	Each year, designate active trawlers based on previous year.	Annual vessel QP limit for active trawlers and exempted vessels (grandfathered existing gear switchers). No gear switching for other entities	Each year, every QS holder would receive 80% of their QP as trawl only and 20% as trawl or fixed gear. ^{iv}	Control Date
CAB - Proposal D (modification)	Same as Prop D (Note that under this modification the vessel receives the "Active Trawl Designation" but the QS owners with a link to a vessel would qualify for receiving 50% of their QS as eligible for any gear, as specified two columns to the left)	Same as Prop D	Same as Prop D	Each year, every QS holder would receive 85% of their QP as trawl only and 15% as trawl or fixed gear, except QS owners with vessels that caught at least half their QS with fixed gear (2011-2016) would receive 50% of their QP as trawl or fixed gear. ^v	Control Date
CAB - Proposal E	Exemption for gear switching vessels.	No	For exempted vessels: Annual vessel QP limit. For entities owning at least 0.15% sablefish QS prior to the control date and with common ownership between the QS account and the vessel: a gear switching cap of twice the amount of sablefish QS owned. For all others: a 0.3% cap for sablefish north.		Control Date Allow southern sablefish quota to be fished north of 36° N. Lat. but only with trawl gear.
CAB - Proposal F	Vessels in the trawl sector (including gear switching vessels) receive a gear switching designation. Vessels newly entering the fishery would not be able to gear switch.	No	Not specified (implies at least the annual vessel QP limit)	Reserve quota for trawl permits.	Control Date Eliminate the 36° N. lat. line for trawl.

Council Options (Sept 2017)

	Limit Number of Gear Switchers		Cap Amount of Gear Switching by an Entity (Cap Not Associated with a Quota Designation)	Quota Designation (Cap Fleet Gear Switching by Designating Quota as Trawl Only or Any Gear)	Control Date ⁱ and Other Elements
	Grandfather Existing Gear Switchers (Permit, Vessel, or Ownership Based).	Active Trawler Designation (Applies to Vessels)			
Council – Interpretation 1 ^{vi}				QP Designation ("any gear" and "trawl-only"; no QS designation). Each year allocate QP with these designations to QS holders (similar to CAB Proposal D)	
Council – Interpretation 2				QS Designation ("any gear" and "trawl-only"). Method of allocating QS to be determined.	
GAP Options September 2017					
GAP 1 (no action)					
GAP 2: Control Date Only					Control date only
GAP 3: Gear Switching Endorsements.	See CAB proposals A and B.				Control Date
GAP 4: Nontrawl gear use QP limit = 50% of vessel QP use limit.	See CAB proposal C (except GAP recommended 50%).				Control Date
GAP 5: Gear designated QP allocated each year to all sablefish QS holders	See CAB Proposal D				Control Date
GAP 6; Soft Cap ^{vii}	Establish a qualifying requirement for participants eligible to gear switch.		Establish a target for the desired amount of gear switching then set a gear-switching annual vessel QP limit for qualified vessels, such that modelling shows the target would be achieved.		Control Date
GAP 7(a) ^{viii} Phase-out all gear switching				(Method for limiting gear switching not yet specified)	
GAP 7(b): Phase-out gear switching, except for designated active trawlers		Required to gear switch		(Method for limiting gear switching not yet specified)	

ⁱ Use of a control date is specified in the alternative or highly likely.

ⁱⁱ For sablefish north of 36° N. latitude the current annual vessel QP limit is 4.5%. A determination needs to be made as to the status of other species under the gear switching limit, e.g. lingcod.

ⁱⁱⁱ The written version of the proposal references caps based on QP but the proponent has indicated that this might be interpreted as a percentage based cap.

^{iv} The percentage allocated as fixed gear QP could also be tapered off, for example, starting at 28% and reduce by 2% a year until 16% is reached.

^v The opportunity for a QS owner to receive 50% as trawl or fixed gear QP would apply only to those QS that were owned as of the control date.

^{vi} The motion was “Gear switching: no action; cap on amount of sablefish quota used with fixed gear (percentage based); reserve a portion of sablefish quota for use only with trawl gear (percentage based)....” While the term “percentage based” was used, it was not clear whether the intent was to reference a percentage of the QP issued each year or the amount of QS that would be designated as eligible for use with fixed gear or trawl only. Therefore, two interpretations are offered here.

^{vii} The active trawler exemption and taper requirements could be used with this option (see GAP 5).

^{viii} Possibly explore in conjunction with increasing the stacking limits in the fixed gear stacking program.