

## Staff Report on the Qualification Criteria from the January 2020 Range of Alternatives

This document is intended to provide the SaMTAAC committee with the preliminary results of the number of entities that would qualify for gear switching privileges based on the range of alternatives moved forward from their January 2020 meeting. This document does not provide a comprehensive analysis which will be provided at a later time.

### Alternative 1

Alternative 1 would create gear specific quota pounds (QPs). Each quota share (QS) account would receive a specific percentage of QPs as trawl-only, with the remainder as unrestricted (the proportions determined based on the options selected, as show in Table 1). If the Council chooses, there would be the option for qualified permit holders with a history of gear switching to “opt-out” a QS account which could receive all of its QPs as unrestricted. Alternative 1 requires that if Gear Specific QP Percentage Option 2 is selected that the opt-out option also be provided. If Option 1 is selected (70 percent trawl/30 any gear), then a choice is provided on whether or not the opt-out option would be included as part of the alternative.

Table 1. Alternative 1 gear specific percentage options and if an opt-out option is provided.

Gear Specific Options Available		Percentage of QP Issued, Based on the Gear Specific Option Chosen	
If Opt-Out is Provided	If Opt-Out is Not Provided	Trawl Percentage	Any Gear
Option 1	Option 1	70	30
Option 2		90	10

Table 2 shows the three options for permit qualification, the number of permits that would qualify under each option and across all options, and the percentage of permits with gear switching history from 2011-2018 that would qualify. As shown, between 34 and 39 permits would qualify under the different options with the same 34 permits qualifying under all three options. Of the 39 permits with some gear switched landings from 2011-2018, there are three that would not qualify under Sub-Options B or C as they had less than 10,000 total fixed gear sablefish north landings over the entire 2011-2018 period. Two permits would qualify under Sub-Option B would not meet Sub-Option C’s higher qualifying poundage.

Table 2 also provides the percent of the 2020 trawl allocation harvested by qualifying permits based on the average landings of the qualified permits from 2011-2018. Note that this is not a projection, but rather a metric to provide the committee with a sense of their historical participation. Under this alternative, all qualified permits would select a QS account to be

designated as opted out. Northern sablefish QS could continue to be added to the account, up to the 3 percent control cap.

Table 2. Number of limited entry trawl permits that would qualify to opt-out under the qualification period and criteria sub-options for Alternative 1, the percentage of permits with gear switching landing history from 2011-2018 that would qualify, and percent of the 2020 allocation based on average catch (2011-2018; all years).

<b>Sub-Option</b>	<b>Qualification</b>	<b>Number of Qualifying Permits</b>	<b>Number Qualifying Under All Options</b>	<b>Qualifying Permit as a Percentage of Permits with Gear Switching History</b>	<b>Percent of 2020 Allocation based on Average Catch 2011-2018</b>
A	Between 1/1/11 and 12/31/18, one fixed gear sablefish landing	39	34	100%	27.18%
B	Between 1/1/11-9/15/17 or between 1/1/14-12/31/18, a minimum of 10,000 lbs of fixed gear sablefish landings	36 (23 under either period, 10 only under the early Period and 3 only under the later period)		92.3%	27.16%
C	Between 1/1/11-9/15/17 or between 1/1/14-12/31/18, a minimum of 30,000 lbs of fixed gear sablefish landings	34 (21 under either period, 10 only under the early Period and 3 only under the later period)		87.2%	27.06%

## Alternative 2

Alternative 2 would establish a gear switching endorsement on limited entry trawl permits that would allow the vessel attached to the permit to fish up to a proposed gear switching limit for sablefish north. Table 3 below shows the three options for permit qualification, the number of permits that would qualify under each option and across all options, and the percentage of permits with gear switching history from 2011-2018 that would qualify. As shown, between 10 and 14 permits would qualify under the different options with the same 10 permits would qualify under all three options. Again, the percent of the 2020 allocation presented in Table 3 is to provide the committee as a reference of historical participation.

Table 3. Number of limited entry trawl permits that would qualify to under each qualification option for Alternative 2, the percentage of permits with gear switching landing history from 2011-2018 that would qualify, and percent of the 2020 allocation based on average catch (2011-2018; all years).

<b>Sub-Option</b>	<b>Qualification</b>	<b>Number of Qualifying Permits</b>	<b>Number Qualifying Under All Options</b>	<b>Qualifying Permit as a Percentage of Permits with Gear Switching History</b>	<b>Percent of 2020 Allocation based on Average Catch 2011-2018</b>
1	10,000 lbs per year in at least three years between January 1, 2011 and September 15, 2017 and participated in at least one year between 2016 through 2018	14	10	35.9%	18.42%
2	30,000 lbs per year in at least three years between January 1, 2011 and September 15, 2017 and participated in at least one year between 2016 through 2018	10		25.6%	17.05%
3	30,000 lbs per year in at least three years between January 1, 2011 and September 15, 2017 and participated in at least one year between 2016 through 2018 or caught 90,000 lbs of north sablefish cumulatively across three years from 2014 to 2018, with at least one gear-switched landing in each of those three years.	13		33.3%	18.78%

Table 4 shows the number of permits that qualify under each Qualification Option compared to the other Qualification Options. There are three permits that qualify only under Option 1, none that qualify only under Option 2, and two that qualify only under Option 3. There are 11 permits that would qualify under both Qualification Options 1 and 3. There are three permits that would

qualify under the 10,000 pound requirement of Qualification Option 1 but not under the 30,000 pound requirement of Qualification Options 2 or 3. While these three permits have recent history, it is not enough to qualify under the 90,000 pound recent history landings bar of Qualification Option 3. An additional permit would not qualify under Qualification Option 2 but would qualify under Qualification Options 1 and 3 due to insufficient landings in multiple years. The two permits that would qualify under Qualification Option 3 but not Qualification Options 1 or 2 as they did not have sufficient landings prior to the control date to qualify.

Table 4. Number of permits that qualify under each qualification option for Alternative 2 in comparison to other options. Black cells are where there are zero permits in that combination.

		Qualified Under Option 1				Totals
		Yes		No		
		Qualified Under Option 2		Qualified Under Option 2		
		Yes	No	Yes	No	
Qualified Under Option 3	Yes	10	1		2	13
	No		3			
Option 2 Total Qualified		10				10
Option 1 Total Qualified		14				14

For each of the permits that would qualify, there are two endorsement options under consideration: Option 1, which would grant each qualifying permit the average percent of the sablefish north trawl allocation caught with fixed gear for years fished (i.e., does not include years with zero activity in gear switching) and Option 2, which would be 4.5 percent of the trawl allocation (i.e. same as the current vessel limit).

### Alternative 3

Under Alternative 3, vessels could harvest sablefish north with fixed gear by meeting the criteria for the active trawler designation or by receiving an exemption based on gear switching history. Table 5 below shows the number of vessels that would qualify under each option. Eleven vessels would qualify under both proposed options. However, under Option 2, which includes Option 1 but would add an opportunity to qualify based on more recent cumulative catch, one additional vessel would qualify. Similar to the above tables, the average catch as a percentage of the 2020 allocation is provided to show historical participation levels.

Under the exemption, vessels could use fixed gear to take the greater of 0.6 percent of the northern sablefish allocation or the percent of northern sablefish QS the vessel owner has owned as of and since the control date. Using 2019 vessel account information for each vessel, under both qualification options, there are four vessel owners that own QS; however, in some cases, the

amount they own would not allow them to gear-switch at levels above 0.6 percent. The total amount of QS owned by those vessel owners is 4.65 percent.

Under Alternative 3, there is a “backstop percentage” of 10 percent, which is the greatest amount of the IFQ sablefish N allocation that could be taken with fixed gear. In this case, the 0.6 percent limit would keep the group of exempted vessels under the 10 percent cap. The 0.6 percent value may be adjusted downward if, prior to finalization of this alternative, it appears that landings with fixed gear will greater than 10 percent.

Table 5: Number of vessels that qualify under each exemption option for Alternative 3, the percentage of vessels with gear switching landing history from 2011-2018 that would qualify, and percent of the 2020 allocation based on average catch (2011-2018; all years).

<b>Option</b>	<b>Qualification</b>	<b>Number of Vessels that qualify under Option</b>	<b>Number Qualifying Under All Options</b>	<b>Qualifying Vessels as a Percentage of Vessels with Gear Switching History</b>	<b>Percent of 2020 Allocation based on Average Catch 2011-2018</b>
1	30,000 lbs of northern sablefish trawl QPs per year in at least three years between January 1, 2011 and September 15, 2017.	11	11	28.2%	20.3%
2	30,000 lbs of northern sablefish trawl QPs per year in at least three years between January 1, 2011 and September 15, 2017 or 90,000 lbs cumulatively across three years from 2014 to 2018, with at least one gear-switched landing in each of the three years.	12		30.8%	20.5%