FINAL

Regulatory Impact Review
for a Temporary Rule (Emergency Action)

to Modify Season Start Date to the Central Gulf of Alaska Rockfish Program in 2021

February 2021

For further information contact: Josh Keaton, NOAA Fisheries Alaska Region
P.O. Box 21668, Juneau, AK 99802
(907) 586-7228

Abstract: This Regulatory Impact Review (RIR) evaluates the costs and benefits of an emergency rule to modify the season start date of the 2021 Central Gulf Rockfish Program fishery from May 1, 2021 to April 1, 2021 to address economic, social, and public health situations present in the rockfish fishery. This action would only modify to the season start date in the 2021 fishing year and would not affect the season start date in subsequent years. This action would not modify other aspects of the Central Gulf Rockfish Program.

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1. Introduction

On February 10, 2021, the North Pacific Fishery Management Council (Council) requested the Secretary of Commerce to promulgate emergency regulations under the authority of Section 305(c) of the Magnuson-Stevens Act to move the start date of the 2021 Central Gulf Rockfish Program fishery to April 1 (regulations under 50 CFR 679.80(a)(3)(ii)). This action would not modify other aspects of the Central Gulf Rockfish Program.

The unexpected continuation of the COVID-19 pandemic, without widespread vaccinations, poses risks to harvesters and processors and continues to cause unforeseen management and operational issues in fisheries. The State of Alaska, similar to other states, continues to maintain health advisories for quarantine, social distancing, and other behaviors for people traveling into and around the State in 2021.[1] In addition, various local municipalities including major fishing ports have implemented ordinances to reduce viral transmissions.

This analysis provides background of the conditions in the fishery and a draft evaluation of the impacts of the requested emergency action to move the start date of the 2021 Central Gulf Rockfish Program (Rockfish Program) to April 1.

[1] State of Alaska health advisories are available at: https://covid19.alaska.gov/health-advisories/.

2. Regulatory Impact Review

This Regulatory Impact Review (RIR)[2] examines the benefits and costs of a proposed regulatory amendment to modify the season start date for the Central Gulf of Alaska Rockfish Program in 2021.

The preparation of an RIR is required under Presidential Executive Order (E.O.) 12866 (58 FR 51735, October 4, 1993). The requirements for all regulatory actions specified in E.O. 12866 are summarized in the following statement from the E.O.:

> *In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to consider. Further, in choosing among alternative regulatory approaches agencies should select those approaches that maximize net benefits (including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.*

E.O. 12866 requires that the Office of Management and Budget review proposed regulatory programs that are considered to be "significant." A "significant regulatory action" is one that is likely to:

- Have an annual effect on the economy of $100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local or tribal governments or communities;
- Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;
- Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or
- Raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in E.O. 12866.

2.1 Statutory Authority

Under the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) (16 U.S.C. 1801, *et seq*.), the United States has exclusive fishery management authority over all marine fishery resources found within the exclusive economic zone (EEZ). The management of these marine resources is vested in the Secretary of Commerce (Secretary) and in the regional fishery management councils. In the Alaska Region, the North Pacific Fishery Management Council (Council) has the responsibility for preparing fishery management plans (FMPs) and FMP amendments for the marine fisheries that require conservation and management, and for submitting its recommendations to the Secretary of Commerce. Upon approval by the Secretary, National Marine Fisheries Service (NMFS) is charged with carrying out the Federal mandates of the Department of Commerce with regard to marine and anadromous fish.

NMFS manages the groundfish fisheries in the EEZ off Alaska under the Fishery Management Plan (FMP) for Groundfish of the Gulf of Alaska (GOA) and under the FMP for Groundfish of the Bering Sea and Aleutian Islands Management Area (BSAI). The Council prepared the FMPs under the authority of

[2] None of the alternatives have the potential to have an effect individually or cumulatively on the human environment. This action will be categorically excluded from the need to prepare an Environmental Assessment.

the Magnuson-Stevens Act, 16 U.S.C. 1801 et seq. Regulations governing U.S. fisheries and implementing the FMPs appear at 50 CFR parts 600 and 679.

The action under consideration would temporarily amend Federal regulations implementing the Rockfish Program fisheries in the Central GOA Regulatory Area at 50 CFR 679. Actions taken to amend FMPs or implement regulations governing these fisheries must meet the requirements of applicable Federal laws, regulations, and Executive Orders.

2.2 Emergency Rule Authority

Section 305(c) of the Magnuson-Stevens Act provides authority for rulemaking to address an emergency. Under that section, a Council may recommend emergency rulemaking if it finds an emergency exists. NMFS's Policy Guidelines for the Use of Emergency Rules provide that the only legal prerequisite for such rulemaking is that an emergency must exist, and that NMFS must have an administrative record justifying emergency regulatory action and demonstrating compliance with the Magnuson-Stevens Act and the National Standards (see NMFS Procedure 01-101-07 (renewed October 3, 2018)[3] and 62 FR 44421, August 21, 1997). Emergency rulemaking is intended for circumstances that are "extremely urgent, special circumstances" where "substantial harm to or disruption of the resource, fishery, or community would be caused in the time it would take to follow standard rulemaking procedures."

To further clarify the scope of emergencies to which this authority applies, the guidance defines an emergency as "a situation that:

1. results from recent, unforeseen events or recently discovered circumstances;
2. presents serious conservation or management problems in the fishery; and
3. can be addressed through emergency regulations for which the immediate benefits outweigh the value of advance notice, public comment, and deliberative consideration of the impacts on participants to the same extent as would be expected under the normal rule making process."

2.3 Emergency Rule Policy and Criteria

Under NMFS' Policy Guidelines for the Use of Emergency Rules, the phrase "an emergency exists involving any fishery" is defined as a situation that meets the following three criteria:

1. Results from recent, unforeseen events or recently discovered circumstances;
2. Presents serious conservation or management problems in the fishery; and
3. Can be addressed through emergency regulations for which the immediate benefits outweigh the value of advance notice, public comment, and deliberative consideration of the impacts on participants to the same extent as would be expected under the normal rule making process.

The following section provides a discussion of how the known conditions in the fishery relate to the criteria for use of emergency rules.

(1) Results from recent, unforeseen events or recently discovered circumstances

Two recent and recently discovered circumstances have limited the ability of vessels to harvest and process groundfish in the port of Kodiak in 2021. First, beginning in early 2021, the groundfish fleet operating out of Kodiak has discovered that there are no longer economically viable markets for a variety of flatfish species including species such as arrowtooth flounder. For several decades, these markets have

[3] NMFS Fisheries Management Policy Directives are available at: https://www.fisheries.noaa.gov/national/laws-and-policies/fisheries-management-policy-directives

been essential to harvesters and processors operating out of Kodiak. This lack of economically viable markets has created an unforeseen lack of harvesting and deliveries to processors operating out of Kodiak in the month of April in Kodiak, Alaska. The U.S. government has recognized the impact of limited seafood markets and included flatfish fisheries prosecuted Alaska in the Seafood Trade Relief Program (STRP), which provides payments to eligible commercial fishermen of seafood commodities that have been impacted by trade actions of foreign governments resulting in the loss of exports (85 FR 56572, September 14, 2020).[4] In addition to flatfish, Kodiak processors and harvesters are heavily dependent on the salmon and rockfish fisheries. Rockfish landings occur in May and June, after flatfish in April, and are followed by summer salmon landings.

Second, COVID-19 outbreaks in January and February 2021 in three large processors in the communities of Akutan and Unalaska, AK, have shut down fishing operations and processing capacity for several weeks, creating widespread disruptions during the fishing season and broad economic impacts. Throughout 2020, processing facilities in Alaska were able to operate effectively with limited long-term disruption to processing activities. The recent closure of processing facilities in Alaska in early 2021 is a recent discovered circumstance that was not anticipated based on largely successful mitigation of COVID-19 in 2020. Even with strict mitigation measures in place, these outbreaks raise concern of future outbreaks across processing facilities in Alaska. Given the continued risk of COVID-19 transmission and outbreaks, fishery participants anticipate there may be additional processor shutdowns throughout 2021. For Kodiak processors, an earlier start date for the Central Gulf Rockfish Program will help alleviate the economic impact from the lack of a flatfish market in April and will help ensure adequate processing capacity to prosecute the Rockfish Program fisheries in 2021.

Due to these limitations, and the recent, unforeseen, and recently discovered circumstances, an emergency action is required to move the start date of the 2021 Central Gulf Rockfish Program fishery to April 1.

(2) Presents serious conservation or management problems in the fishery

Recent, unforeseen, and ongoing COVID-19 outbreaks in processing plants across Alaska present serious management problems in the Central Gulf Rockfish Program. If the season start is not moved to April 1, there is a risk that the season for the Rockfish Program may conflict with the summer salmon fisheries, causing seafood businesses to choose between one revenue source or another, particularly if a COVID outbreak occurs in Kodiak and reduces processing capacity for several weeks.

Additionally, moving the season start date to April 1 will help processors continue to employ fishermen and plant personnel throughout April, a month that is typically busy with flatfish but will have an anticipated gap in 2021 due to the lack of a flatfish market. By maintaining fishing and processing operations through the month of April, this would reduce travel to and from the port of Kodiak, Alaska reducing the health risks to essential seafood workers and residents.

NMFS notes that this emergency action would not lead to a conservation concern by increasing the risk of overharvest of rockfish. The requested emergency action would not increase the rockfish catch limits. The total amount of rockfish harvested would not increase. This emergency rule would not modify existing requirements on the types of vessels and gear that could be used, monitoring requirements, record keeping regulations, or other aspects of the Central Gulf Rockfish Program.

(3) Can be addressed through emergency regulations for which the immediate benefits outweigh the value of advance notice, public comment, and deliberative consideration of the impacts on participants to the same extent as would be expected under the normal rule making process

[4] U.S. Department of Agriculture Seafood Trade Relief Program is available at: https://www.farmers.gov/manage/seafood

NMFS and the Council have determined that the emergency situation created by the lack of a flatfish market and the continued risk of COVID-19 outbreaks across processing and fishing operations can be addressed by emergency regulations. Opening the fishery one month earlier would not create conservation and management concerns and is consistent with the overall goals of the Central Gulf Rockfish Program.

To address the emergency, NMFS must implement an emergency rule that waives the notice-and-comment rulemaking period. The benefits of waiving notice-and-comment rulemaking will serve the industry and public by allowing for an additional month for fishery participants to harvest rockfish. Any delay that results in implementing rulemaking may impact the ability for the fishery to start earlier. Section 4 of the RIR describes the potential additional harvest opportunities for the Rockfish Program participants in greater detail.

Without the waiver of notice-and-comment rulemaking, the Rockfish Program participants will not have sufficient time before the rockfish fishery opens. The Central Gulf Rockfish Program must be coordinated with other harvesting and processing activities. Processors may not have enough time to staff their facilities and coordinate fishing activities for an earlier season, with notice-and-comment rulemaking. For example, Kodiak processors are anticipating a gap in processing needs in April with the lack of a flatfish market and may adjust their staffing accordingly. Additionally, vessel owners need time to secure crew to support their fishing operation, to revise fishing plans, restock vessels, change gear, and have the vessel travel to and from the fishing grounds to prosecute the Rockfish Program fishery.

This emergency action would not impose additional restrictions on the fishery, but would alleviate limitations on the fishery. This emergency rule would not increase the amount of available harvests, increase the risks of overharvest, or otherwise modify conservation measures. This emergency rule is needed to allow for the complete and efficient harvest of the Rockfish Program fishery and to temporarily alleviate unforeseen economic and social consequences due to the recent and unforeseen limitations on the Rockfish Program fishery.

The Council could not recommend and NMFS could not implement an earlier season start date through the conventional notice-and-comment rulemaking process before the 2021 Central Gulf Rockfish Program began on May 1, 2021. Typically, the process of Council analysis and rule making takes at least one-year to implement. In this case, NMFS received the request for regulatory change on February 10, 2021, and the next regularly scheduled Council meeting begins April 5, 2021. Given that the Central Gulf Rockfish Program starts on May 1, 2021 and this rule starts the season a month earlier, and the time required for Council action and notice-and-comment rulemaking, this process could not be accomplished before the earlier start date of April 1, 2021.

2.4 Purpose and Need for Action

On February 11, 2021, the council passed the following motion[5]:

> The Council requests the Secretary promulgate emergency regulations under the authority of Section 305(c) of the Magnuson-Stevens Act to move the start date of the 2021 Central Gulf Rockfish Program fishery to April 1 (regulations under 50 CFR 679.80(a)(3)(ii)). This action does not modify other aspects of the Central Gulf Rockfish Program.

The Council believes that an emergency exists involving the risk of COVID-19 among processing facilities and recommends emergency rulemaking to address economic, social, and public health situations present in the rockfish fishery. There is no shoreside market for flatfish this year due to both tariffs and COVID-19, factors that are outside the realm of the Council process but directly affect the health of our fisheries. An additional factor is the high risk of closures of shoreside processors as they

[5] Council motion is available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=ab2ee494-bac0-4e25-a101-d3afb7275a7e.pdf&fileName=E1%20Motion%20ER%20Rockfish.pdf.

deal with COVID-19, which is more prevalent this year than last year. It is more difficult to keep processors and communities 100% virus free. Processors, harvesters, communities, and the state of Alaska are working around the clock to try to keep people safe, comply with State of Alaska health orders, and keep prosecuting and processing all the fisheries. This change would start the fishery one month early, the flexibility for which should help allow the rockfish fishery to be prosecuted before overlapping with the summer salmon fishery, even if processing is interrupted due to COVID. Spreading out these fisheries was part of the intent of the original program, to maximize benefits to the community and allow for more continual fishing and processing. Providing flexibility to processors can help them deal with the challenges due to COVID-19 and the lack of a shoreside market for flatfish.

2.5 Alternatives

This section describes two alternatives; 1) no action, or status quo and 2) the action recommended by the Council to move the season start date to April 1, 2021 as well as a discussion of implementation issues.

2.5.1 Alternative 1: No Action (Status quo)

Without emergency action, the Central Gulf Rockfish Program will open May 1, 2021 as described in 50 CFR 679.80(a)(3)(ii).

2.5.2 Alternative 2: Emergency Action to move the season start date to April 1, 2021

The Council recommended emergency action to allow the 2021 Central Gulf Rockfish Program season start date to move to April 1.

The option proposed in a public comment letter and considered by the Council on February 10, 2021 would not modify rockfish catch limits. The total amount of rockfish harvested would not increase.

As presented in the public comment letter states:

"Given the risk of infections and more processor shutdowns, Rockfish Coop members believe an earlier start date for the season will help ensure (but not guarantee) adequate processing capacity to prosecute the rockfish program fisheries in 2021."

The proposal requests that emergency action be taken to change the Central Gulf of Alaska Rockfish Program fishing start date from May 1, 2021 to April 1, 2021.

2.6 Council Action

The Council recommended an emergency action to allow the 2021 Central Gulf Rockfish Program season start date to move to April 1.

The Council recognized that lack of a flatfish market in Kodiak, AK is an unforeseen circumstance with broad economic impacts. Additionally, the Council recognized the ongoing logistical and operational challenges with managing COVID-19 risks in processing facilities and fishing vessels. The Council concluded that allowing the 2021 Central Gulf Rockfish Program season start date to begin one month earlier on April 1 would provide relief and flexibility to processing facilities and harvesters who are managing the risk of COVID-19 outbreaks and the potential impacts on the fishing season. The flexibility from a longer season will allow the Rockfish Program fishery to be prosecuted before overlapping with the summer salmon fishery, even if processing is interrupted due to COVID-19 outbreaks. The Council noted that the action is consistent with the intent of the Central Gulf Rockfish Program, to maximize benefits to the community and spread out the fisheries to allow for continued fishing and processing. The

Council recognized that there are no conservation issues with this emergency rule. It extends the timeframe in which that harvest can be taken by one month and does not affect allowable harvest.

COVID-19 outbreaks in 2021 have temporarily shut down processing facilities and severely impacted fishing businesses in the Alaskan fishing-dependent communities of Akutan and Unalaska. The community of Kodiak, AK is heavily dependent on rockfish and salmon and the continued risk of COVID-19 outbreaks in processing facilities create substantial logistical challenges. This emergency rule would provide much-needed flexibility to respond to uncertainty surrounding the duration and extent of the pandemic, and maximize opportunities to get rockfish harvested efficiently while not conflicting with the summer salmon fisheries. In these unforeseen circumstances, it makes sense to provide this level of flexibility to the Central Gulf Rockfish Program. In public testimony regarding this request for emergency action, Industry participants noted that all Rockfish Program cooperatives support this request to change the season start date in 2021 and that this action would provide additional flexibility to all fishery participants.

3. Description of Rockfish Program

In 2003, the U.S. Congress directed the Secretary of Commerce to establish, in consultation with the North Pacific Fishery Management Council (Council), a Rockfish Pilot Program (RPP) for management of the Pacific ocean perch (POP), northern rockfish, and pelagic shelf rockfish fisheries (the primary rockfish fisheries) in the CGOA. Following this directive, the Council adopted a share-based management program in 2005, under which the total allowable catch (TAC) of rockfish primary species is apportioned as exclusive shares to cooperatives, based on the catch history of the members of those cooperatives. The Magnuson-Stevens Act extended the term of the program to 5 years. In 2011, the Council proposed, the Secretary of Commerce approved, and NMFS implemented the CGOA Rockfish Program (RP), which became effective for the 2012 fishing year. A more detailed history of the fishery is provided in the proposed Amendment 111 Central Gulf of Alaska Rockfish Program Reauthorization (NMFS, 2020).

The Rockfish Program was developed to slow the race for fish, minimize bycatch and associated mortalities, provided for improved conservation of habitat, and addressed the social and economic concerns that have arisen under the original management system. The longer fishing season established under the Rockfish Program provides participants access to markets (including a possible fresh market) that were historically impossible to access because of the short duration and timing of the previous open access fishing season. In addition by slowing the race for fish, Rockfish Program participants could focus on improving the quality of their landings, increasing fishery value and reducing overall PSC use.

Under the Rockfish Program, the allocation of the rockfish primary species is divided between the catcher vessel sector and the catcher processor sector, based on historical catches of the participants in these respective sectors. In addition, each sector is allocated the important incidental catch species (i.e., sablefish, Pacific cod, shortraker rockfish, rougheye rockfish, and shortspine thornyhead rockfish) based on the historical harvests of the sector. Exceptions are that Pacific cod is not allocated to catcher processor cooperatives, and shortraker rockfish and rougheye rockfish are not allocated to catcher vessel cooperatives but are instead managed under MRAs. These species are not allocated in the different cases, because the sector has limited catches of the species, which could lead to allocations inadequate to support catch of rockfish primary species, but MRAs are set low, relative to their historical levels, to discourage harvests in excess of historical catch amounts. Each sector is also apportioned Pacific halibut PSC, based on historic halibut mortality in the target rockfish fisheries.

Under the Rockfish Program, participants in each sector can only fish as part of a cooperative. Each cooperative receives allocations of rockfish primary and secondary species, and an allowance of halibut PSC, from the sector's allocations, based on the rockfish primary species catch histories of its members. The limited access fishery receives an allocation of rockfish primary species, based on the rockfish primary species catch histories of sector members that choose not to join a cooperative. Rockfish secondary species catch is limited by an MRA, which is reduced from the historical level to maintain total catch at a level comparable to a corresponding cooperative allocation and to reduce the economic incentive to fish in the limited access fishery.

Cooperatives manage and coordinate fishing of their allocations. Rockfish primary and secondary species are subject to a full retention requirement to prevent discards. All allocations to a cooperative are constraining, so a cooperative must manage and monitor members' catch of rockfish primary species, allocated rockfish secondary species, and halibut PSC allowances to ensure that it is able to fully harvest (but not exceed) its allocations and PSC allowance. To protect processors, each catcher vessel in the program is eligible for membership in a single cooperative, which must form an association with the processor to which it historically delivered the most rockfish. These cooperative/processor associations are intended to ensure that a cooperative land a substantial portion of its catch with its members' historical processor. The exact terms of the association are subject to negotiation and are confidential to

the parties, but since the cooperative agreement requires the approval of the associated processor, it is likely that these agreements contain terms defining cooperative landing requirements.

3.1 Harvest

Participation in the RP and RPP is provided in Table 3-1. This table only goes back to the 2007 fishery, because that is the first year the RPP was in place. The number of vessels participating in the fishery have been relatively stable over the period. Catcher processors (CP) ranged from four to eight vessels with either five or six vessels participating in each of the four most recent years. An equal number of License Limitation Program (LLP) licenses were used on the CPs as the number of vessels participating. Catch varied from over 4,000 mt in 2008 and 2009 to slightly over 11,000 mt in 2020. The first wholesale value of the CP rockfish fishery ranged from slightly over $4 million in 2009 to a high of over $14 million in 2017. In 2019, the first wholesale value of the fishery was nearly $9 million. Values for 2020 were not yet available. For the catcher vessels (CV), the number of vessels ranged from 25 to 29 vessels, with 27 participating in 2020. Generally, two to three more LLP licenses were used in the fishery than CVs fishing. Catch varied from over 8,000 mt in 2008, 2009, and 2011 to over 14,000 mt in 2016 and 2020. The number of processing plants varied from a low of four in 2020 to a high of eight in 2007, 2010, and 2011. The ex-vessel value of the CV rockfish fishery ranged from nearly $4 million in 2009 to a high of over $9 million in 2012. The 2019 ex-vessel value of the CV rockfish fishery was slightly over $6 million. First whole value ranged from a low of over $13 million from 2007 through 2009 to a high of over $23 million in 2012. In 2019, the first wholesale value of the CV rockfish fishery was slightly over $16 million.

Table 3-1 Reported catch (mt) and real value (millions of 2012 $) of all species harvested by trawl gear in the CGOA RP and RPP fisheries, 2007 through 2020

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Total
CP															
Vessels		7	8	4	4	5	5	5	4	5	4	4	4	4	9
Licenses		7	8	4	4	5	5	5	4	5	4	4	4	4	9
Processing Plants		7	8	4	4	5	5	5	4	5	4	4	4	4	9
Reported Catch (mt)		4,851	4,226	6,105	5,836	9,191	7,967	10,415	10,903	10,908	10,854	10,891	8,846	11,414	100,992
Ex-vessel Value		$2.07	$1.75	$3.82	$5.13	$6.33	$4.41	$5.65	$5.30	$5.19	$5.89	$5.94	$4.29	*	$55.78
First Wholesale Value		$5.10	$4.31	$8.78	$12.45	$14.46	$10.03	$13.53	$13.39	$13.06	$14.42	$13.91	$8.58	*	$132.01
CV															
Vessels	27	27	26	27	25	28	29	28	28	27	25	26	29	27	40
Licenses	29	29	28	29	27	30	31	30	30	29	28	28	32	31	39
Processing Plants	8	6	6	8	8	7	7	7	7	7	6	5	5	4	12
Reported Catch (mt)	9,261	8,797	8,697	10,108	8,871	11,997	10,483	12,625	12,616	14,413	10,379	13,188	13,806	14,665	135,979
Ex-vessel Value	$5.52	$5.58	$3.93	$5.18	$6.29	$9.22	$6.24	$6.86	$6.47	$7.16	$5.82	$6.25	$6.01	*	$80.53
First Wholesale Value	$13.16	$13.38	$13.49	$16.19	$19.41	$23.40	$16.51	$17.82	$17.74	$21.89	$17.48	$21.23	$16.01	*	$227.72
Total															
Vessels	27	34	34	31	29	33	34	33	32	32	29	30	33	31	49
Licenses	29	36	36	33	31	35	36	35	34	34	32	32	36	35	48
Processing Plants	8	13	14	12	12	12	12	12	11	12	10	9	9	8	21
Reported Catch (mt)	9,261	13,648	12,923	16,213	14,707	21,188	18,450	23,040	23,519	25,321	21,232	24,079	22,651	26,079	236,972
Ex-vessel Value	$5.52	$7.66	$5.68	$8.99	$11.43	$15.55	$10.65	$12.51	$11.77	$12.35	$11.71	$12.19	$10.30	*	$136.31
First Wholesale Value	$13.16	$18.49	$17.80	$24.97	$31.87	$37.85	$26.53	$31.35	$31.12	$34.95	$31.90	$35.14	$24.59	*	$359.73

Source: AKFIN summary of CAS data

* Price data is not yet available

3.2 Prices

Real ex-vessel and first wholesale prices, in real 2012 dollars, for 2003 through 2019 are presented in this section. Average real prices are provided for the years the CGOA rockfish fishery was open access, fished under the RPP, and fished under the RP. Data are grouped in this fashion to provide information on changes in price as it relates to the different management structures, since increased product quality and an associated increase in value is one of the benefits that is often associated with LAPP programs.

Table 3-2 shows the real ex-vessel prices for the three primary rockfish species, Pacific cod, sablefish, arrowtooth flounder, and mid-water pollock. Prices at the first wholesale level and the ex-vessel level are determined by world whitefish markets. However, product quality can influence the prices received. All three primary rockfish species' ex-vessel value increased over the periods considered with the exception of 2019, which saw value decline for the primary rockfish species. The pollock and Pacific cod ex-vessel values declined in real dollars when the open access average is compared to the RP year's average. Sablefish real ex-vessel prices increased relative to the limited access period and were similar on average under the RPP and RP structures. Sablefish real ex-vessel prices declined in 2018 and 2019 to the point they were the same as the limited access period. This could in part be due to the increased catches of smaller, lower valued sablefish. Arrowtooth flounder, followed a trend closer to that of the rockfish species. The reasons for the relative changes are likely complex and diverse. However, the increase in rockfish prices may be due, in part, to the LAPP structure that the Pacific cod and pollock fisheries did not have. Arrowtooth prices increased even though they operated under an open access fishery, the arrowtooth market has in the past been relatively strong compared to the open access period because of increased demand from secondary processors and innovations to improve product quality. More recently, arrowtooth prices in China have declined as demand and sales slow due to retaliatory tariffs by China on American seafood exports (AFSC, 2019). Given that approximately 80 percent of the harvested arrowtooth flounder is exported to China, the resulting effects of these retaliatory tariffs is reduced U.S. arrowtooth flounder exports which has resulted in limited markets to sell arrowtooth flounder.

Table 3-2 Annual average real ex-vessel prices (2012 $) for CGOA rockfish, Pacific cod, sablefish, arrowtooth flounder, and mid-water pollock

Year	POP	Dusky	Northern	Pacific cod	Sablefish	Arrowtooth	Pollock
2003	0.08	0.07	0.06	0.29	1.53	0.03	0.09
2004	0.09	0.08	0.08	0.25	1.33	0.04	0.11
2005	0.14	0.12	0.12	0.27	1.33	0.04	0.14
2006	0.19	0.18	0.18	0.35	1.70	0.05	0.14
2003-2006 Average	$0.12	$0.11	$0.11	$0.29	$1.47	$0.04	$0.12
2007	0.17	0.16	0.15	0.46	1.72	0.05	0.11
2008	0.16	0.17	0.16	0.51	1.98	0.06	0.17
2009	0.11	0.14	0.10	0.25	2.05	0.04	0.17
2010	0.17	0.14	0.14	0.24	2.81	0.04	0.17
2011	0.23	0.22	0.21	0.32	4.04	0.05	0.17
2007-2011 Average	$0.17	$0.17	$0.17	$0.17	$0.17	$0.17	$0.17
2012	0.27	0.26	0.25	0.32	3.24	0.06	0.18
2013	0.20	0.19	0.17	0.23	2.33	0.04	0.17
2014	0.20	0.20	0.18	0.29	2.76	0.06	0.13
2015	0.19	0.19	0.17	0.26	2.53	0.06	0.11
2016	0.19	0.18	0.16	0.29	2.86	0.07	0.08
2017	0.20	0.21	0.17	0.35	3.41	0.10	0.08
2018	0.21	0.21	0.17	0.39	1.90	0.09	0.11
2019	0.18	0.16	0.15	0.42	1.10	0.05	0.11
2012-2019 Average	$0.20	$0.20	$0.18	$0.32	$2.52	$0.07	$0.12

Source: AKFIN summary of CAS and COAR data.

Table 3-3 provides a comparison of the ex-vessel and first wholesale prices[6] for the three primary rockfish species. This table was generated to show that first wholesale prices increased under the RPP but does not show substantial change from the RPP to the RP. However, since the ex-vessel prices increased more over the period, the ratio of ex-vessel to first wholesale price increased. This indicates that processors are paying a larger percentage of their rockfish income to purchase the raw fish from the harvester.

Table 3-3 Comparison of ex-vessel and first wholesale prices of primary rockfish species

	Ex-vessel			First Wholesale			Ratio ex-vessel to first wholesale		
Years	POP	Dusky	Northern	POP	Dusky	Northern	POP	Dusky	Northern
2003	$0.08	$0.07	$0.06	$0.23	$0.32	$0.30	0.32	0.21	0.21
2004	$0.09	$0.08	$0.08	$0.29	$0.38	$0.35	0.33	0.22	0.22
2005	$0.14	$0.12	$0.12	$0.48	$0.66	$0.66	0.29	0.19	0.19
2006	$0.19	$0.18	$0.18	$0.61	$0.68	$0.65	0.31	0.26	0.28
2003-2006 Average	$0.12	$0.11	$0.11	$0.40	$0.51	$0.49	0.31	0.22	0.23
2007	$0.17	$0.16	$0.15	$0.45	$0.47	$0.47	0.37	0.34	0.33
2008	$0.16	$0.17	$0.16	$0.48	$0.46	$0.46	0.33	0.36	0.35
2009	$0.11	$0.14	$0.10	$0.43	$0.59	$0.58	0.26	0.24	0.17
2010	$0.17	$0.14	$0.14	$0.60	$0.53	$0.59	0.28	0.26	0.23
2011	$0.23	$0.22	$0.21	$0.84	$0.88	$0.98	0.27	0.25	0.21
2007-2011 Average	$0.17	$0.17	$0.15	$0.56	$0.59	$0.62	0.30	0.29	0.26
2012	$0.27	$0.26	$0.25	$0.78	$0.77	$0.77	0.35	0.34	0.32
2013	$0.20	$0.19	$0.17	$0.56	$0.61	$0.62	0.36	0.31	0.27
2014	$0.20	$0.20	$0.18	$0.54	$0.60	$0.63	0.37	0.33	0.28
2015	$0.19	$0.19	$0.17	$0.54	$0.66	$0.62	0.35	0.28	0.27
2016	$0.19	$0.18	$0.16	$0.53	$0.70	$0.70	0.36	0.26	0.23
2017	$0.20	$0.21	$0.17	$0.64	$0.65	$0.58	0.31	0.32	0.30
2018	$0.21	$0.21	$0.17	$0.63	$0.70	$0.69	0.33	0.29	0.25
2019	$0.18	$0.16	$0.15	$0.43	$0.64	$0.64	0.41	0.25	0.23
2012-2019 Average	$0.20	$0.20	$0.18	$0.58	$0.67	$0.66	$0.35	$0.30	$0.27

Source: AKFIN summary of CAS and COAR data.

3.3 RP Trawl Primary and Secondary Species

One of the goals of the RPP was to enhance resource conservation in the CGOA rockfish fisheries. The RP was intended to continue the cooperative management structure that provides the fleet with tools to minimize bycatch to the extent practicable, reduce discards and improve utilization of groundfish species. Much of the information can be found in the most recent GOA SAFE document (NMFS, 2019) in addition to the Amendment 111 CGOA Rockfish Program EA/RIR Reauthorization (NMFS, 2020).

The RP primary species are northern rockfish, POP, and dusky rockfish. The RP primary species stocks are assessed biennially as three distinct species in Federal waters. The RP primary species are not overfished and are not approaching overfished levels.

CGOA TAC are established for the three primary RP species POP, northern rockfish, and dusky rockfish. The RP sector allocation of these species is equal to the CGOA TAC minus the Incidental Catch Allowance (ICA) established for bycatch needs in other target fisheries and the allocation to the longline entry level fishery.

[6] First wholesale prices are calculated as the total revenue derived from the sale of the fish divided by the round weight of the fish used to generate the products. The prices do not reflect the first wholesale price individual product sold in the market. Prices were calculated using this method so that ex-vessel and first wholesale prices are more directly comparable.

CGOA POP TACs ranged between 6,000 mt and 10,000 mt until 2010 and increased to 23,678 mt in 2020 (Figure 3-1). POP TAC increases began in 2006 (the year prior to the start of the RPP) and continued each year through 2016. The 2017 TAC decreased slightly but increased again in 2018 and 2020. The trawl gear catch of CGOA POP in the RP has increased along with the increasing TAC with almost all of the trawl catch being taken in the RP fishery. RP cooperatives were able to harvest almost all of their annual allocations without exceeding their sector allocation. Catch of POP during the RPP and RP ranged from a low of 4,486 mt to high of 20,228 mt in 2020.

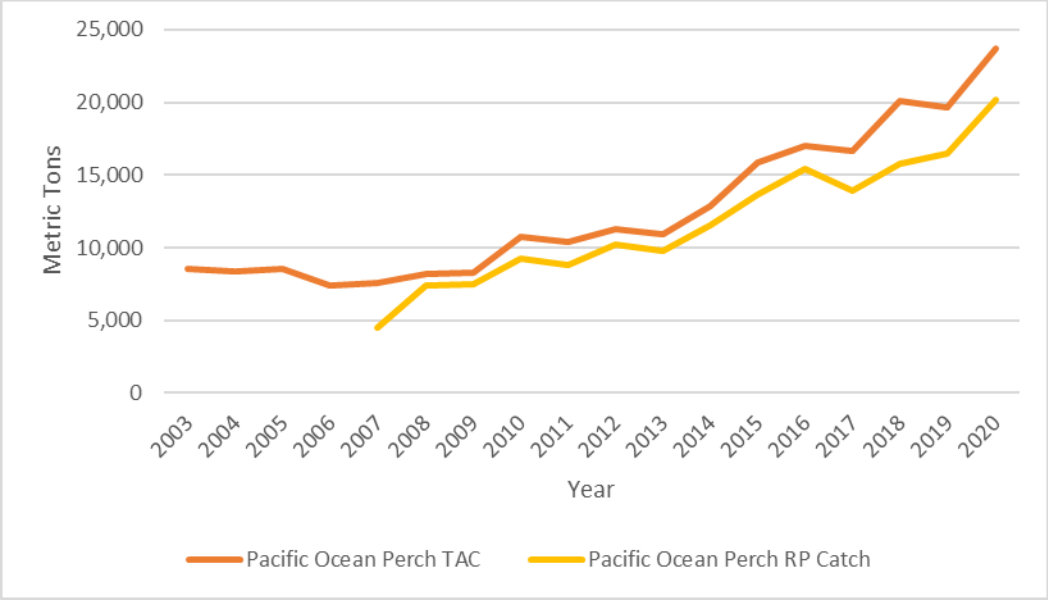

Figure 3-1 CGOA POP TAC and RP catch (mt)

The northern rockfish CGOA TACs ranged from a low of 2,281 mt in 2011 to a high of 4,640 mt in 2003 (Figure 3-2). The 2020 TAC is set at 3,178 mt. Like POP, almost all of the CGOA northern rockfish trawl catch is taken in the RP fishery. Current levels of catch are close to those taken during the RPP but are less than taken under the RP from 2012 through 2016. In 2017, the catch of northern rockfish dropped by half to a low of 1,430 mt. In 2020, catch of northern rockfish was 1,583 mt.

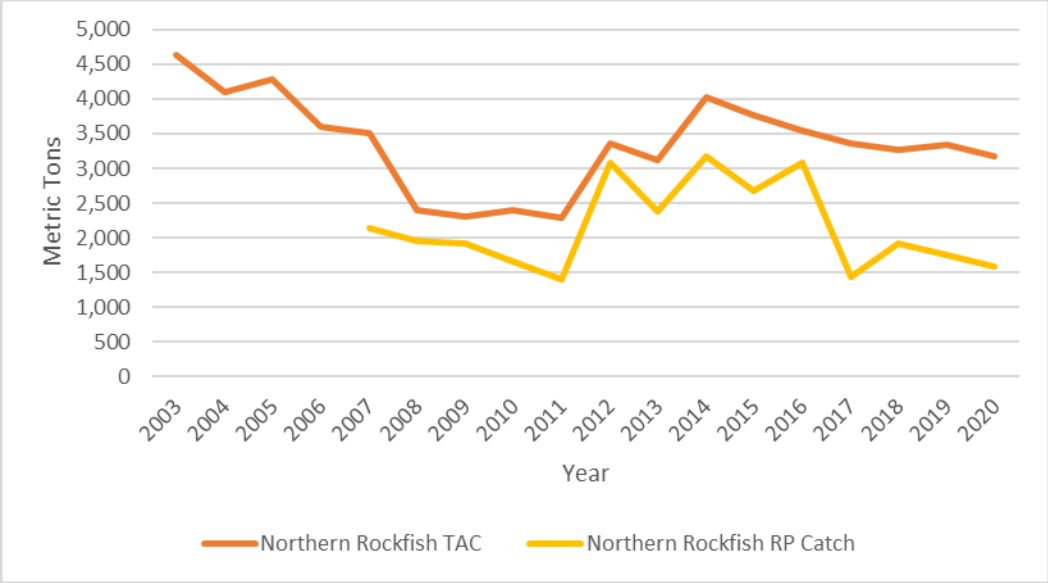

Figure 3-2 CGOA Northern rockfish TAC and RP catch (mt)

Dusky rockfish TACs remained fairly steady over the years considered (Figure 3-3). TACs ranged from 2,760 mt in 2019 to 4,147 mt in 2016. The 2019 TAC was 646 mt below the 2003 through 2019 average. The dusky rockfish TAC is about the same size as the northern rockfish TAC, but only about 15 percent of the POP TAC. Like the CGOA POP and northern rockfish fisheries almost all of the CGOA dusky rockfish catch is taken in the RP. Trawl gear counts for a vast majority of the primary rockfish species catch.

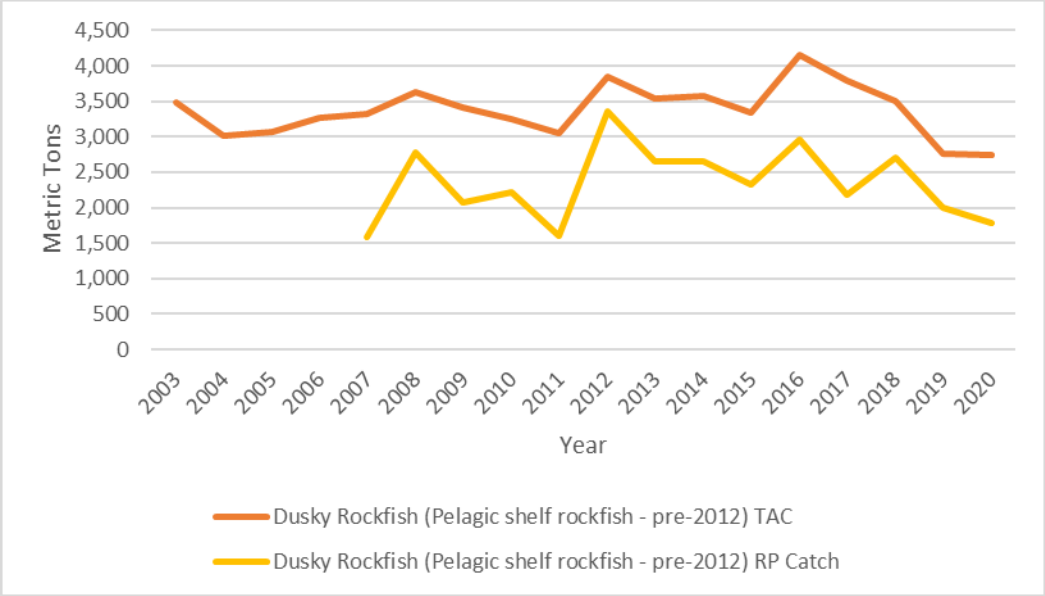

Figure 3-3 CGOA dusky rockfish TAC and RP catch (mt)

The RP program cooperatives harvested a smaller percentage of their allocation in 2017 than other years. That year less than 50 percent of the TAC was taken. The percentage taken in 2018 increased to over 60 percent but is still less than had been taken in previous years. The reason the percentage declined is likely

due to factors impacting both available harvesting and processing capacity. Harvesting vessels try to harvest the rockfish species after the early pollock and Pacific cod seasons end but before the June 10th opening for pollock in the BSAI, the West Coast whiting fishery, and tendering for pink salmon starts. On the processing side, the large pink salmon fishery took much of the summer capacity of the processing plants in Kodiak. With so much capacity directed towards salmon deliveries, some vessels were limited in their ability to make rockfish deliveries.

Secondary species allocated under the RP include three rockfish species, Pacific cod, and sablefish (50 CFR 679.81(c)). The three secondary rockfish species are thornyhead rockfish, shortraker rockfish, and rougheye rockfish. The RP secondary species stocks are assessed either biennially or annually and GOA-wide biomass estimates are available each year.

A portion of the Pacific cod TAC is allocated to the CV cooperatives and the remainder is available to non-RP participants. A portion of the shortraker and rougheye TACs are allocated to CP cooperatives with the remainder available to the non-RP fisheries. Portions of the sablefish and thornyhead rockfish TACs are allocated to the CV and CP cooperatives, with the remainder being allocated to the non-RP fishery. Vessels that are members of the cooperatives may utilize the available non-RP portion of the TACs after their cooperative checks out of the RP by notifying NMFS. A summary of the secondary species allocations to CV and CP sectors is presented in Table 3-7 from Amendment 111 to the Fishery Management Plan for the Gulf of Alaska (NMFS, 2020).

3.4 Seasonal fishing activity

As noted in Figure 3-4, CVs begin fishing in the BSAI trawl fishery or the CGOA trawl fishery on January 20. During the period mid-April to May, fishing activity is reduced in the CGOA. The RP opens May 1 and the vessels tend to focus on the CGOA rockfish fisheries or other GOA target fisheries through early June. Vessels begin moving back into the BSAI in early June to be there for the start of the BSAI trawl fisheries on June 10. After the BSAI trawl fisheries slow, vessels fish either the CGOA rockfish and other trawl fisheries or the WGOA. Limited effort continues in the BSAI and picks up again when the fall fisheries open. After those fisheries slow at the end of September, most vessels fish the remainder of the year in the CGOA trawl fisheries, with very limited participation in the BSAI trawl fisheries.

CPs fish in the BSAI trawl fisheries exclusively until April. In early April, two vessels fished in the CGOA for several weeks. The vessels then exclusively fished in the BSAI trawl fishery until as many as three vessels moved to the CGOA for the rockfish fishery. The reported vessels then fished either CGOA, WGOA, or the BSAI until the end of August when all the effort returned to the BSAI.

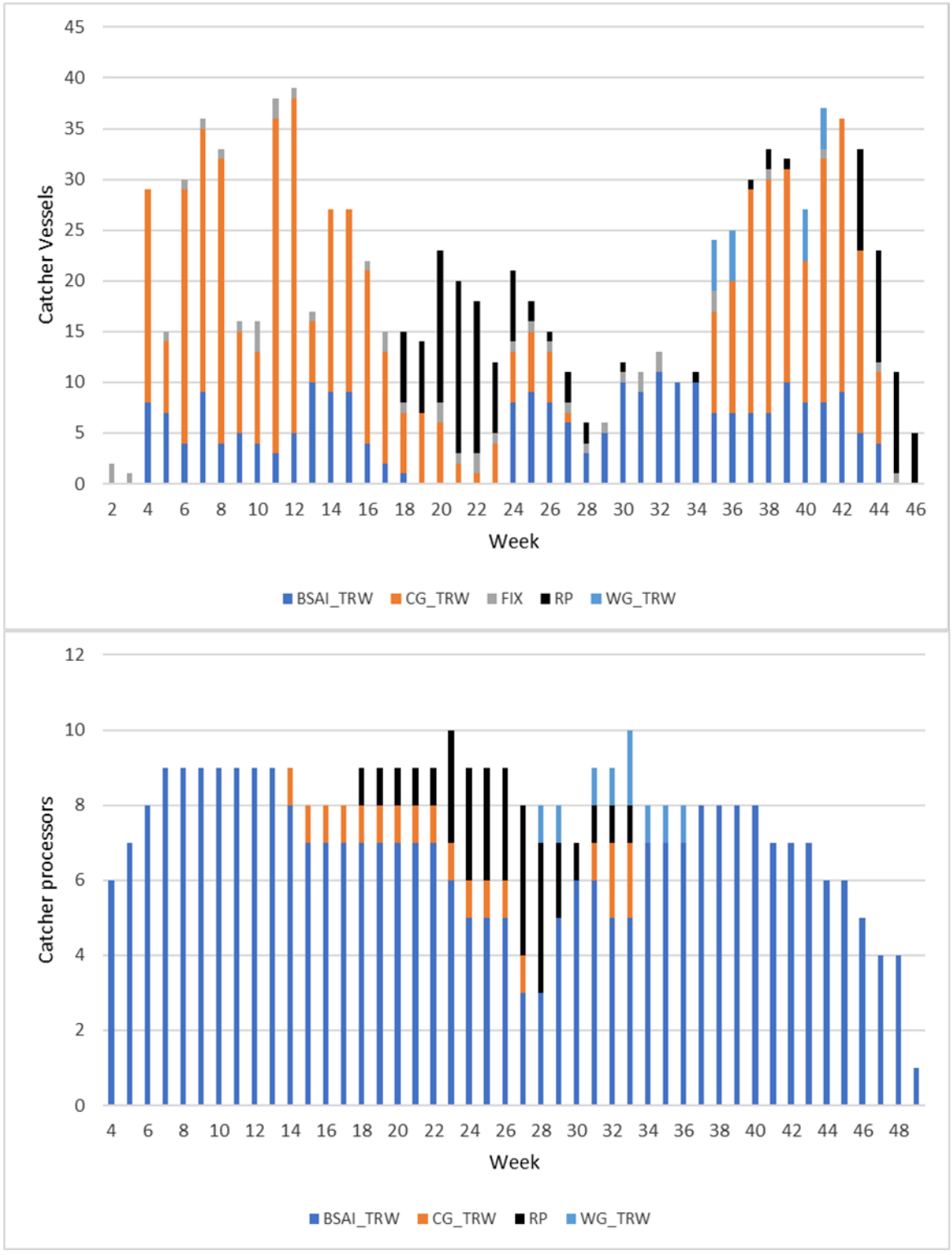

Figure 3-4 Number of RP vessels by type participating by fishery and week, 2020

3.5 Unallocated Species and PSC Species

In prosecuting the targeted rockfish fisheries in the CGOA, participating CPs and CVs in the fisheries also catch prohibited species. Retention of prohibited species is not allowed in the GOA groundfish fisheries, including the trawl rockfish fishery. The Magnuson-Stevens Act prohibition on retention of prohibited species harvests was intended to eliminate any incentive that groundfish fishermen might otherwise have to target these species: Pacific halibut (*Hippoglossus stenolepis*), Pacific salmon (*Oncorhynchus spp.*), steelhead trout (*Oncorhynchus mykiss*), Pacific herring (*Clupea pallasi*), red king crab (*Paralithodes camtschaticus*), blue king crab (*P. platypus*), golden or brown king crab (*Lithodes aequispinus*), bairdi Tanner crab (*Chionoecetes bairdi*) and opilio Tanner crab (*C. opilio*). Detailed information on PSC by CVs and CPs can be found in the Amendment 111 CGOA Rockfish Program EA/RIR Reauthorization (NMFS, 2020).

Table 3-4 is presented to show all the PSC species taken in the CGOA trawl rockfish fishery from 2015 through 2020. Bycatch of those species tended to be very low in both the CP and CV sectors with minimal amounts of crab and herring estimated as having been caught. Other salmon (primarily chum salmon) varied by year with a maximum of 1,810 fish taken by the CV sector in 2015. The CP sector has had low Chinook salmon bycatch, with less than 250 fish in recent years. This highlights that salmon bycatch in the rockfish fishery varies by year and Chinook salmon and other salmon do not always trend in the same direction.

Table 3-4 All PSC species taken in the CGOA trawl rockfish fishery from 2015 through 2020.

Sector	Year	Groundfish (mt)	Halibut (mt)	Chinook Salmon (Count)	Other Salmon (Count)	Red King Crab (Count)	Bairdi (Count)	Golden King Crab (Count)	Other Tanner Crab (Count)	Herring (mt)
	2015	10,928	50.6	53.0	180.0	0.0	0.0	19.0	0.0	0.0
	2016	10,408	37.4	235.0	0.0	0.0	0.0	0.0	0.0	0.0
	2017	10,229	45.3	104.0	49.0	0.0	627.0	9.0	0.0	0.0
	2018	10,958	25.8	1.0	138.0	0.0	0.0	0.0	0.0	0.0
	2019	8,010	25.9	0.0	0.0	0.0	0.0	22.0	0.0	0.0
CP	2020	10,953	11.8	560.0	660.0	0.0	69.0	0.0	0.0	0.1
	2015	11,902	22.7	1,802.0	63.1	0.0	0.0	0.0	0.0	0.0
	2016	14,291	25.4	148.7	215.7	0.0	0.0	19.7	0.0	0.0
	2017	10,457	28.6	386.8	51.3	0.0	16.1	24.8	0.0	0.0
	2018	13,370	28.8	282.5	149.6	0.0	122.5	31.4	0.0	0.0
	2019	13,672	10.1	297.5	142.1	0.0	0.0	0.0	0.0	2.2
CV	2020	14,418	30.9	52.4	13.2	0.0	876.2	0.0	0.0	0.0

Chinook Salmon

In the GOA, the primary species of concern for salmon bycatch is Chinook salmon (*Oncorhynchus tshawytscha*), which is caught almost exclusively in trawl gear. The Chinook salmon is the largest of all Pacific salmon species, with weights of individual fish commonly exceeding 30 pounds. North Pacific Chinook salmon are the subject of commercial, subsistence, personal use, and sport/recreational (used interchangeably) fisheries. Chinook salmon are the least abundant of the five salmon species found on both sides of the Pacific Ocean and the least numerous in the Alaska commercial harvest.

Rockfish target fisheries accounted for between 2 percent and 19 percent of the Chinook salmon taken in the CGOA groundfish fisheries. The variability highlights the difficulty fishermen have in avoiding Chinook salmon bycatch in the Rockfish Fishery in particular and in all trawl fisheries in general.

Trawl CV

Starting in 2015, the RP trawl CVs are limited to 1,200 Chinook salmon each year while checked into the RP (Amendment 97 to the GOA FMP). If the RP trawl CVs reach the Chinook salmon limit, directed fishing by all CVs in the RP will be prohibited for the remainder of the year. On October 1, if it is determined that more than 150 Chinook salmon from the RP CV limit will not be caught, the available Chinook salmon limit minus 150 fish can be reallocated for use by CVs in other GOA fisheries.

In general, Chinook salmon PSC tends to be difficult to consistently avoid. Improvements in gear and communication on the fishing grounds have provided some benefits. However, there are still instances where a vessel is reported to encounter relatively high PSC rates when other vessels in the area had not previously realized high rates. Members of the fleet often describe these events as "lighting strikes" since they tend to be difficult to predict and, therefore, avoid.

In an attempt to reduce Chinook salmon PSC, all shoreside cooperatives agreed to the Salmon Bycatch Avoidance Plan adopted in 2014. The plan included various reporting requirements, bycatch standards and a "slow start" to fishing to test the fishing grounds which have been proven to be effective in reducing Chinook salmon PSC. Since the Chinook salmon PSC limit was implemented for the RP, the CV sector has been well under their 1,200 fish limit, except for 2015. During 2015, CVs exceeded their limit of 1,200 fish, but were well under their limit until November.

Trawl CP

Trawl CP vessels fishing in the Gulf of Alaska are subject to a limit of 3,600 Chinook salmon in the Western and Central Gulf of Alaska, or, 4,080 Chinook salmon if the previous year's catch of Chinook salmon did not exceed 3,120 fish. This limit applies to vessels fishing inside and outside of the RP. Directed fishing by trawl CPs will be closed in the GOA when that limit is projected to be reached. The trawl CP sector has a seasonal limit before June 1 of either 2,376 or 2,693 Chinook salmon, depending on whether they were allocated additional Chinook salmon as a result of being under their defined limit the previous year. Because their catch has been below the 3,120 fish threshold, the limit is currently 4,080 fish.

Chinook salmon PSC used by the trawl CP sector in the CGOA has shown considerable variability. Chinook salmon bycatch before the RPP was implemented ranged from 290 fish to 665 fish. After 2013 the range was from 1 fish to 661 fish. The CGOA bycatch of Chinook salmon during the RP years was considerably less than the long-term average of 1,157 Chinook salmon.

Table 3-5 reports the average monthly bycatch of Chinook salmon by target fishery. The timing of Chinook salmon bycatch follows a predictable pattern in most years, corresponding primarily with seasonal openings of the pollock fishery. Chinook salmon are caught as bycatch in the rockfish fisheries throughout the time that the fisheries are open. Bycatch in April is largely attributable to the arrowtooth flounder or rex sole fishery. Since the implementation of the RPP, more efficient use of halibut PSC has allowed the shallow-water flatfish fishery to remain open longer into the fall, which has also resulted in some increase in Chinook salmon bycatch during these months.

Table 3-5 Average Chinook salmon PSC taken by RP vessels by month and CGOA trawl fishery from 2012-2020

Target Fishery	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Arrowtooth Flounder	4	1	82	488	299	35	2	72	12	118	12	7
Shallow water Flats	1						5	59	7	56	11	1
Rex Sole		6	51	290	61						8	
Pollock - bottom	14	46	34	11	5			7	409	437	45	
Pollock - midwater	438	2,762	890	74	5			69	927	2,418	81	
Rockfish				8	299	116	136	82	70	22	169	

Pacific Halibut

The rockfish fishery generally accounts for between 2 percent and 16 percent of the halibut bycatch of these vessels in the GOA. Flatfish and Pacific cod target fisheries generally have more halibut bycatch. The decline in the Pacific cod TAC in recent years has played a role in the halibut bycatch in the CGOA rockfish fishery surpassing the CGOA Pacific cod fishery. Halibut mortality declined after implementation of the RPP and has remained relatively low.

The drastic reduction in halibut mortality (particularly in the CV sector) likely arises from several factors. First, vessels have exclusive allocations, allowing them to move from areas of high halibut catch without risking loss of catch of the rockfish primary species. Second, exclusive allocations also increase the incentive for participants to communicate with each other concerning catch rates, improving information concerning areas of high halibut incidental catch in the fleet, and preventing repeated high halibut mortality among vessels exploring fishing grounds. Third, several vessels have begun employing new pelagic gear that limits bottom contact and halibut incidental catch.

Table 28d to 50 CFR part 679 specifies the amount of the trawl halibut PSC limit that is assigned to the CV and CP sectors that are participating in the RP. This includes 117.3 mt of halibut PSC limit to the CV sector and 74.1 mt of halibut PSC limit to the CP sector. These amounts are allocated from the trawl deep-water species fishery's halibut PSC third seasonal apportionment. After the combined CV and CP halibut PSC limit allocation of 191.4 mt to the RP, 150 mt remains for the trawl deep-water species fishery's halibut PSC third seasonal apportionment.

Each year NMFS assigns a portion of the CV halibut PSC to shore-based RP cooperatives. The amount assigned to each cooperative is based on the primary species CQ associated with the cooperative member’s LLP licenses.

The fishing plan established by shore-based cooperatives also included a system to discourage high halibut bycatch rates. An incentive for these internal bycatch controls is to ensure that the sector’s PSC limit is not reached, because it would result in the closure of all RP fisheries. The bycatch controls include standards that are set and enforced by the cooperative members. Halibut bycatch standards adopted by shore-based cooperatives include the inter-cooperative red light, yellow light, green light system. The

light system is based on the percentage of halibut PSC per ton of groundfish used in RP target fisheries. The ratio of halibut to groundfish indicates whether the vessel may continue fishing, fish with caution, or stop fishing to avoid high halibut bycatch (Alaska Groundfish Data Bank, Inc, 2018).

The CV fleet had never taken more than 52 percent of its 117.3 mt halibut PSC limit since the RP was implemented in 2012 and most years less than 33 percent of the limit was taken. CPs have never taken their RP halibut PSC limit (74.1 mt): the closest they came was in 2015. That year they still had 21 mt of halibut mortality remaining after the cooperative members finished fishing for the year.

3.6 Factors considered in establishing the May 1 start date

Under the Rockfish Program, the Central GOA rockfish fishery has shifted from an approximate 3-week race to fish starting at the beginning of July, to a fishery that primarily occurs in May and June, with smaller harvest amounts occurring until November. Prior to the implementation of the RP, the Gulf of Alaska rockfish fisheries opened on January 1 for non-trawl gear participants and July 1 for the trawl gear. Both the trawl and non-trawl fisheries were prosecuted from a single TAC, with the harvest from the trawl fishery limited to the remaining available TAC after the non-trawl fleet had prosecuted the fishery from its January 1st opening. Limited effort in the longline fishery meant that most of the TAC was harvested by the trawl fleet (NPFMC, 2017).

The Council concluded a short-term solution to the rockfish race for fish was needed to stabilize the community of Kodiak while a more comprehensive GOA rationalization solution was developed. Kodiak had experienced multiple processing plant closures, its residential work force was at risk due to shorter and shorter processing seasons and the community fish tax revenues continued to decrease as fish prices and port landings decrease (NMFS, 2006). Due to the race for fish, the fisheries were prosecuted in an economically inefficient manner that diminishes quality and value of landings and products. The race for fish also created incentives for participants to compromise safety to increase catch. The problems facing the Council were to develop a management program which slowed the race for fish, minimized bycatch and associated mortalities, provided for improved conservation of habitat, and addressed the social and economic concerns that have arisen under the original management system.

In developing the Rockfish Program, it was thought that fishing would extend beyond the early July season. Rockfish targeting was expected to be concentrated during periods of the year when high catch rates of rockfish and low catch rates of secondary species and halibut occur. Fishing outside the season would provide an opportunity for some participants to try markets (including a possible fresh market) that have been historically impossible to access because of the timing of the season. In addition, slowing the race for fish would allow harvesters to focus more on improving the quality of their landings. If higher quality production generates higher revenues, participants would be expected to adopt fishing techniques that improve quality, such as reducing total catch in each tow and improved icing of catch.

The extended season under the cooperative was also thought to enable members of the sector to consolidate their rockfish allocations and realize efficiencies in the rockfish fishery and other fisheries. A cooperative that used relatively few members' vessels to harvest its annual allocation could potentially minimize observer and monitoring equipment costs (in addition to saving on total operating costs). A cooperative that can manage its own sideboards would be permitted to harvest its allocation over the longer season, freeing its members to enter other Gulf of Alaska fisheries in the beginning of July (without a stand-down). This ability to enter other fisheries could lead to cooperatives harvesting their allocations either earlier or later than the traditional July opening, to free their members to compete in other fisheries that open early in July. The cooperative, however, would only be permitted to harvest its historic share from those other fisheries, limiting any potential impact on others.

The start and end dates for the extended season under the RP was set based on considerations of bycatch of other species, rockfish reproduction, and processor activity. The pre-RP July season start date for the rockfish trawl fishery was intended to reduce halibut PSC. NOAA Fisheries expressed concerns that expanding the fishery into new time periods could affect halibut PSC and incidental catch of species not allocated under the program. Additionally, the July start date was established to reduce potential conflicts with the sablefish trawl survey, which typically occurs in early summer (NMFS, 2006).

After Council discussion, the agency concluded that because there are PSC caps, an earlier start date was acceptable (NPFMC, 2005). This PSC caps can be effectively managed by the cooperatives due to an extended season that allows for implementation of PSC avoidance measures by cooperative managers. These measures include enhanced reporting requirements and bycatch standards that have proven effective in reducing PSC.

The non-trawl fishery is conducted as a competitive fishery open to all applicants eligible to participate in the CGOA limited access fisheries. Bycatch of non-PSC species has been minimally impacted by the extended PSC season. The trawl rockfish fishery appears to have a very minor role in Chinook salmon bycatch when compared to pollock trawl, and the overall level of Chinook and chum salmon bycatch remains low due to the relatively small size of the fishery (NMFS, 2006).

The timing of rockfish spawning was a large consideration when the season should open. Early analysis considered a start date of March, but concerns raised by the SSC regarding the high level of uncertainty about when spawning occurs resulted in the Council to push the start of the season to May (NPFMC, 2005) as it was seen as preferable to allow reproduction to occur prior to season opening. The May 1st opening date of the fishery could still result in some harvests in the fishery prior to completion of rockfish reproduction, but the exploitation rates for rockfish in the Gulf of Alaska are conservative, largely due to the lack of definitive biological information on many of the species. It is not likely that allowing the fishery to occur prior to larvae release would create a biological concern and an opening date of May ensured that most of the reproductive activities for the various rockfish species would be concluded (NMFS, 2006). Discussions noted that the majority of information on rockfish spawning pertain to POP, and there is little to no information on other rockfish species reproduction. Agency scientists noted that if harvest rates are set conservatively, an opening date in March or April should not be a problem but that the most conservative management approach would be to delay the opening to avoid any impact on potential rockfish reproduction and allow for improved operational efficiency by staggering the opening of this fishery relative to other fisheries. (NPFMC, 2005).

The season closing date of November 15th was selected to allow for fishing activity to be distributed over the course of the year where value could be maximized and efficiencies improved. An earlier or later start date was not given a large amount of consideration as November 15th corresponds closely with when processors and plants are closing for IFQ fisheries (NPFMC, 2005).

4. Analysis of Impacts

This section analyzes two alternatives: (1) no action, and (2) earlier season start date for the Rockfish Program through an emergency rule. The Council selected Alternative 2 as a recommendation for an emergency action to move the 2021 Central Gulf Rockfish Program season start date to April 1.

Table 4-1 summarizes the impacts of the alternatives. This action is limited in scope and considers providing additional flexibility to address certain economic, social, and public health situations present in the rockfish fishery due to COVID-19 and loss of the catcher vessel arrowtooth markets in the CGOA (Section 2.3).

These alternatives would not modify existing requirements on the types of vessels and gear that could be used, monitoring requirements, record keeping regulations, or other aspects of the Central Gulf Rockfish Program. Therefore the scope of this analysis is limited to discussion related to issues related to an earlier start date and operation of the fishery. These include temporal changes on harvest of primary, secondary and PSC species, vessels, shoreside processors, and management considerations. In-depth information on the various elements of the Rockfish Program can be found in the most recent GOA SAFE document (NMFS, 2019) in addition to the proposed Amendment 111 Central Gulf of Alaska Rockfish Program Reauthorization (NMFS, 2020).

Table 4-1 Summary of Impacts of Alternatives 1 and 2.

	Alternative 1 – Status Quo	**Alternative 2 – April 1, Season Start**
Harvest of Primary and Secondary Species	•Harvest is managed by the TAC and other management measures established in the GOA FMP. Rockfish Program management measures allocate portions of the TAC to cooperatives and cooperatives are prohibited from exceeding the cooperative quota (CQ).	•Harvest remains constrained by the TAC and management measures within the Rockfish Program that prevent exceeding CQ (same as status quo). •The extension of the season will provide additional flexibility to allow cooperatives to adjust to unforeseen events related to ongoing COVID-19 outbreaks in processing plants across Alaska and provide more opportunity for the TACs of primary and secondary species to be fully harvested. •Without Alternative 2, if a COVID-19 outbreak occurs in Kodiak and reduces processing capacity for several weeks, the rockfish season may conflict with the summer salmon fisheries, causing seafood businesses to choose between one revenue source or another. This may result in less harvest of primary and secondary species, particularly those species of lesser value.
Chinook Salmon PSC	•PSC of Chinook salmon is managed by a PSC limit allocated to Rockfish Program participants. If the PSC limit for Chinook salmon is exceeded, the cooperatives must cease fishing. •Chinook salmon PSC is hard to predict. Cooperative managers have established management measures to avoid Chinook salmon PSC. In most years, the Chinook	•PSC of Chinook salmon is managed the same as status quo. •An April 1 season start date would provide cooperatives additional flexibility under established management measures to avoid Chinook salmon PSC and prevent a closure of Rockfish Program operations if the PSC limit is reached.

	salmon PSC limit has not constrained harvest of primary and secondary species.	
Halibut PSC	•PSC of Pacific halibut is managed by a PSC limit allocated to Rockfish Program participants. If the seasonal PSC limit for halibut is exceeded, the cooperatives must cease fishing. •Cooperatives have established management measures to limit halibut PSC rates. In recent years, the cooperatives have not been constrained by halibut PSC limits and typically do not harvest more than one-third of the halibut PSC limit allocated to the Rockfish Program.	•PSC of Pacific halibut is managed the same as status quo. •An April 1 season start date would provide cooperatives additional flexibility under established management measures to avoid halibut PSC.
Impacts to other fisheries	•The Rockfish Program established measures to limit adverse impacts to other fisheries. One of the primary benefits of the Rockfish Program was it provided benefits in limiting impacts to other fisheries by shifting the timing of the fishery.	•An April 1, season start date would not affect established measures intended to limit adverse impacts on other fisheries. The management measures included sideboards that remain unchanged in this action. Rockfish fisheries typically occur in limited spatial areas that do not have significant overlap with other fishery footprints. It is possible some interaction with other fisheries like the IFQ sablefish fishery may occur, however these interactions currently occur when arrowtooth fisheries are prosecuted. The recent and unforeseen loss of the arrowtooth market will likely reduce interactions between IFQ sablefish vessel operators and rockfish program participants.
Vessels	•Rockfish Program vessels also participate in other fisheries, including Pacific cod, Pollock and flatfish. Recent and unforeseen circumstances have resulted in a lack of a flatfish market, which RP vessel operators target in the month of April. The loss of this market removes opportunity for vessels to operate in April.	•The additional flexibility of an April 1 season start date would allow vessels to remain in operation despite the loss of flatfish markets they typically fish during the month of April. This would enable vessel operators to optimize economic efficiency in catching allocated primary and secondary species.
Shoreside Processors	•If the recent and unforeseen market conditions for flatfish persist, shoreside processors may have to reduce operation during the month of April. •If a COVID-19 outbreak occurs in Kodiak and reduces processing capacity for several weeks, the rockfish season may conflict with the summer salmon fisheries, causing seafood businesses to choose between one revenue source or another.	•Vessels participating in the earlier start date for the Rockfish Program would allow shoreside processing facilities to remain in operation despite the loss of flatfish catch due to market conditions.
Management considerations	•Regulations in 50 CFR 679 established deadlines to enable management of the	•This alternative would not modify existing requirements on the types of vessels and gear that

	Rockfish Program elements with a May 1 season date opening.	could be used, monitoring requirements, record keeping regulations, or other aspects of the Central Gulf Rockfish Program, same as the status quo.

4.1 Alternative 1: No Action

If the Council's recommended emergency action is not approved and implemented; then the existing season date for the Rockfish Program would remain May 1. With no market for arrowtooth flounder available, vessel operators and processing plants would likely reduce operations in April. This could result in a temporary loss of employment opportunity to vessel crew and processing plant workers.

Industry participants remain concerned about the potential for COVID-19 outbreaks, even with strict mitigation measures in place. The potential for future outbreaks across processing facilities in Alaska could have significant economic and operational impacts in the Port of Kodiak. Given the continued risk of COVID-19 transmission and outbreaks, fishery participants anticipate there may be additional processor shutdowns throughout 2021. If this occurs, processing capacity is expected to be reduced, which increases the risk that the Rockfish Program fishery may conflict with the summer salmon fisheries and associated demand on processing capacity. These conflicts result in loss of product quality and cause seafood businesses to choose between one revenue source and another. These potential scenarios may result in less harvest of Rockfish Program species.

4.2 Alternative 2: Emergency Action to move the season start date to April 1, 2021 (Preferred Alternative)

The Council's recommendations for emergency action would allow fishing in the Rockfish Program to begin on April 1, 2021. This recommendation is specific to the 2021 fishing year and would not change the season start date in subsequent years. This alternative would provide enhanced flexibility to vessel operators and processing plants participating in the Rockfish Program. This alternative is designed to mitigate the impacts from the recent and unforeseen loss of arrowtooth markets and threat of loss of processing capacity and/or potential conflict with summer high volume salmon related to COVID-19 plant closures. This alternative would not modify existing requirements on the types of vessels and gear that could be used, monitoring requirements, record keeping regulations, or other aspects of the Central Gulf Rockfish Program. An April 1 start date is within the range of dates analyzed during the development of the Central Gulf Rockfish Program (NMFS, 2006). For that reason, this action would not have any effects beyond those previous analyzed. The effects of the date range considered in the EA were determined to be not significant. Therefore, this action would not have any significant effects on the environment.

The following sections provide additional description of the types of impacts that could be expected on harvests, fishing and processing operations, other fisheries, and management considerations.

Changes in Harvest

The emergency action would not change management measures implemented to constrain harvest below the TAC. NMFS annually allocates rockfish primary and secondary species to the rockfish cooperatives after taking into account the incidental catch needs of other fisheries and providing a predetermined amount of rockfish primary species to an entry level longline fishery. Cooperatives are prohibited from exceeding the cooperative quota (CQ) assigned. Section 3 describes the harvest of primary and secondary species. Additional flexibility provided by the earlier start date may allow cooperatives to fully harvest

available allocations even when faced with the operational uncertainty related to COVID-19 and existing market conditions.

The additional flexibility of an April 1, season start date could result in slower rates of fishing and dispersed landings of improved quality over the no action alternative. If participants attempt to extend fishing over a longer season, it is possible that unexpected higher incidental catch rates of rockfish secondary species could constrain their rockfish harvests. If high incidental catch in other parts of the year is perceived as limiting, it is likely that participants would choose to concentrate their fishing under the program closer to the traditional season.

Timing of Harvest

The timing of fishing CGOA rockfish allocations would depend on the particular operational needs of members, market opportunities, and fishing success. The lack of available arrowtooth markets in 2021 present a challenge for vessel operators and processing plants to remain fully operational in the month of April. This alternative would provide additional fishing and processing opportunity during the month of April for vessels and processors to remain in operation. As a result, it is likely some rockfish fishing would occur in April in order to keep processing plants fully operational and potentially mitigate future impacts of operational challenges related to COVID-19.

Prohibited Species Catch

In prosecuting the Rockfish Program fisheries in the CGOA, participating CPs and CVs also catch prohibited species. Retention of prohibited species is not allowed in the GOA groundfish fisheries, including the Rockfish Program fisheries. The Rockfish Program established PSC limits for Chinook salmon and Pacific halibut. While the Rockfish Program season dates were partially based on PSC avoidance, the implementation of PSC limits was thought to mitigate concerns with increased PSC with a longer season.

Cooperatives are given exclusive allocations, allowing members flexibility to move from areas of high bycatch without risking loss of catch of the rockfish primary species. Exclusive allocations also increase the incentive for participants to communicate with each other concerning catch rates, thereby improving information concerning areas of high incidental catch in the fleet. Cooperatives managers have established PSC avoidance measures and these measures have proven effective in reducing harvest of prohibited species in recent years as discussed in section 3.

There is limited data on PSC rates in Rockfish Program fisheries for the month of April. If participants attempt to extend fishing over a longer season, it is possible that unexpected higher PSC rates could constrain their rockfish harvests. If high PSC rates are encountered in April and that is perceived as limiting, it is likely that vessels will choose to concentrate their fishing under the program closer to the traditional season. The combination of the PSC limits, robust PSC avoidance measures currently implemented by cooperative managers, and the enhanced flexibility provided by this action would likely mitigate any increases in PSC rates during April.

Impacts to Fisheries

The Rockfish Program season dates were initially based on fishery patterns and considerations related to processor activity. The shift in timing of processing activity under the Rockfish Program has increased processor operational efficiency. Central GOA rockfish trawl-caught landings have shifted out of peak salmon processing time during the month of July to what was a period of lower activity for the processors earlier in the year during the months of May and June. This increased efficiency of operations and helped to attenuate some of the sharper seasonal peaks and valleys of processing labor demand. The May 1 season date was set based on information that there was an arrowtooth flounder market in the month of April. This emergency action would retain and potentially enhance those operational efficiencies that are

currently threatened by unexpected loss of the arrowtooth market and mitigate potential impacts related to COVID-19.

Trawl vessels typically prosecute arrowtooth fisheries during the month of April. The unexpected loss of the arrowtooth market in 2021 severely limits opportunities for catcher vessels and shoreside processors to remain fully operational in the month of April. By moving the start date of the Rockfish Program to April 1, this emergency action would provide the opportunity for catcher vessels and associated processors to remain in operation during the month of April. Vessel operators that typically participate in arrowtooth fishing during the month of April will likely take advantage of the enhanced flexibility and participate in Rockfish Program fisheries during April.

Under this Alternative, management of the Rockfish Program fisheries, with exclusive allocations to cooperatives, would continue to reduce the incentive for fishermen to initiate and/or continue fishing trips in inclement weather or when other operational dangers arise. The potential flexibility gained by a longer season enhances these established benefits of the program.

Shoreside processors in Kodiak rely on trawl vessels to keep a steady flow of fish throughout the year in order to remain fully operational, including the month of April. Other fisheries that occur in April are limited to IFQ halibut and sablefish, which are typically low volume and can be somewhat unpredictable. This action would provide an additional flexibility for trawl vessels to participate in the Rockfish Program during April, thereby mitigating some impacts on shoreside processors due to the loss of arrowtooth markets. Rockfish Program deliveries during April could keep fish flowing into processing plants and keep plants fully operational, mitigating the economic and operational impacts of COVID-19 and current market conditions.

Recent COVID-19 outbreaks in January and February 2021 in processors in the communities of Akutan and Unalaska, AK, have shut down fishing operations and processing capacity for several weeks, creating widespread disruptions during the fishing season and broad economic impacts. Even with strict mitigation measures in place, these outbreaks raise concern of future outbreaks across processing facilities in Alaska. Given the continued risk of COVID-19 transmission and outbreaks, fishery participants anticipate there may be additional processor shutdowns throughout 2021. By providing early access to rockfish fisheries, it is expected to shift more rockfish fishing activity away from the month of July when processors are operating in high volume salmon fisheries and provide flexibility to allow for enhanced product quality of both salmon and rockfish fisheries.

Management Considerations

This Alternative would not modify existing requirements on the types of vessels and gear that could be used, monitoring requirements, record keeping regulations, or other aspects of the Central Gulf Rockfish Program. Rockfish Program participants are required to continue to comply with all applicable regulations. This emergency action only allows the Rockfish Program to occur one month earlier.

A start date of April 1, 2021 would require cooperatives to comply with certain regulatory requirements earlier in the year than if the season were to open on May 1, however NMFS has identified no barriers to providing the necessary support to limit impacts to the earlier start date. These requirements are in the control of the cooperatives and associated shoreside processors and can be accomplished any time. Rockfish Program participants requirements necessary to allow participation in an earlier start date. For example, as of February 19, 2021, Cooperative applications have been submitted. Agency staff do not anticipate delays in the approval of Catch Monitoring Control Plan (CMCP) for Rockfish Program processors prior to April 1 assuming processing plants submit them early as communication from cooperative managers has advocated for. The State of Alaska anticipates approval of state certified scales in early March, providing ample time for processing plants to submit CMCP for approval before the April 1 fishery start date if they plan to participate early.

The earlier start date may create access issues to observers due to the short notice of moving the season date to April 1, 2021. Rockfish Program requires 100% observer coverage and observer providers did not anticipate the loss of the arrowtooth fishing activity and potential increase in rockfish fishing activity in April. The lack of available observers may limit effort during the earlier start date. Communication between vessel operators, cooperative managers and observer providers is already occurring to attempt to mitigate this potential impact. Vessel operators will need to work closely with observer providers to ensure they have access to observers required under 50 CFR 679.

5. National Standards

Below are the 10 National Standards as contained in the Magnuson-Stevens Act, and a brief discussion of how each alternative is consistent with the National Standards, where applicable. In recommending a preferred alternative, the Council must consider how to balance the national standards.

National Standard 1 — Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.

This action extends the timeframe in which CGOA Rockfish Program cooperatives can harvest their primary and secondary species quota shares by one month and does not affect allowable harvest for these species. This action would not modify any other elements of the program or the management measures in place to prevent exceeding cooperative shares or overfishing of primary or secondary CGOA Rockfish Program species or affect the status of CGOA rockfish or secondary species allocated under the program.

National Standard 2 — Conservation and management measures shall be based upon the best scientific information available.

In recommending this action, the Council considered written and oral public comment, and the information in this analysis represents the most current, comprehensive information available. The analysis draws on the best scientific information that is available concerning the CGOA rockfish fisheries. The most up-to-date information that is available has been provided by the managers of these fisheries, as well as by members of the fishing industry.

National Standard 3 — To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.

The action is consistent with the management of individual stocks as a unit or interrelated stocks as a unit or in close coordination. This action does not modify the management of the CGOA rockfish throughout its range.

National Standard 4 — Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be; (A) fair and equitable to all such fishermen, (B) reasonably calculated to promote conservation, and (C) carried out in such a manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

This action is consistent with National Standard 4 because it provides additional flexibility in a fair and equitable manner across all participants in the CGOA Rockfish Program and does not modify aspects of the Rockfish Program that are designed to ensure that no particular individual, corporation, or other entity acquired an excessive share of such privileges. This action is reasonably calculated to promote conservation by providing additional operational flexibility within existing parameters designed to conserve fishery resources.

National Standard 5 — Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources, except that no such measure shall have economic allocation as its sole purpose.

This action would improve the efficient use of the resource consistent with National Standard 5, but is not solely an economic allocation. Providing flexibility for an earlier rockfish season would help fishing businesses mitigate potential processor closures due to COVID-19 outbreaks and limited markets due to

trade tariff impacts for arrowtooth flounder and other flatfish fisheries, leading to a reduction in the likelihood of substantial amounts of forgone harvest and promote optimum yield. This action would improve efficiency by providing harvesters and processors the flexibility to prosecute their operations to balance overlapping fisheries.

National Standard 6 — Conservation and management measures shall take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches.

The purpose of this action is to allow for contingencies in the CGOA rockfish fishery for the duration of the 2021 fishing year. This action is in response to the COVID-19 pandemic and limited flatfish markets due to trade tariff to allow CGOA rockfish participants additional flexibilities to safely achieve optimum yield.

National Standard 7 — Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.

This action does not increase administrative burden or complicate the annual specifications publication and implementation process compared to the status quo. Therefore, the measure would minimize cost and avoid unnecessary duplication.

National Standard 8 — Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of National Standard 2, in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

This action is consistent with National Standard 8 by providing for the sustained participation of Kodiak harvesters and processors, who rely on CGOA rockfish for harvesting and processing in their communities. Providing flexibility for an earlier rockfish season would reduce the likelihood of substantial amounts of forgone harvest and promote optimum yield. This action is not expected to have adverse impacts on communities or affect community sustainability. This action provides additional flexibility for CGOA participants, thus minimizing adverse economic impacts on fishing communities.

National Standard 9 — Conservation and management measures shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

This action continues to promote the conservation of fishery resources because it maintains existing limits on bycatch and other conservation measures consistent with National Standard 9.

National Standard 10 — Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.

This action promotes safety of life at sea by extending the season for rockfish, providing more time to safely prosecute CGOA rockfish. This action provides additional flexibility for fishing operations to harvest rockfish, thus reducing risks to fishing crews, their families, and their communities consistent with National Standard 10. This action would not modify existing safety regulations, authorized gear, the size or type of vessels that may be used in the fishery, or otherwise affect the amount of species that could be harvested.

6. Preparers and Persons Consulted

Preparers

Josh Keaton, National Marine Fisheries Service (NMFS), Sustainable Fisheries Division (SF)

Maggie Chan, NMFS SF

Jon McCracken, North Pacific Fishery Management Council (NPFMC) Staff

Contributors

Jennifer Watson, NMFS SF

Cathy Tide, NMFS SF

Bill Donaldson, NMFS SF

Mike Fey, Pacific States Marine Fisheries Commission

Glenn Merrill, NMFS SF

Tom Meyer, NOAA General Counsel, Alaska Section

Alicia M Miller, NMFS SF

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