

Best Use
Cooperative
Annual
Report to
the North
Pacific
Fishery
Management
Council

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2009

Introduction

On September 14, 2007, the National Marine Fisheries Service (NMFS) published a final rule for implementing Amendment 80 to the Fishery Management Plan for groundfish of the Bering Sea and Aleutian Islands management area (BSAI). Amendment 80 provides specific groundfish and prohibited species catch (PSC) allocations to the non-American Fisheries Act (AFA) trawl catcher processor sector and allows the formation of cooperatives. Sector allocations and the formation of cooperatives were intended to assist compliance with the Groundfish Retention Standard (GRS) program.

On January 20, 2008, the Best Use Cooperative (BUC) began fishing allocations under regulations implementing Amendment 80. This report summarizes BUC, its catch for the 2008 fishing year, and the processes implemented to ensure that catch limits are not exceeded.

BUC membership

BUC is comprised of the following seven member companies, and sixteen non-AFA trawl catcher processors.

Company	Vessel	Length Overall
M/V Savage	Seafisher	211
Fishermen's Finest, Inc.	American No. 1	160
	U.S. Intrepid	184
Iquique U.S., L.L.C.	Arica	186
	Cape Horn	158
	Rebecca Irene	140
	Tremont	125
	Unimak	184
Jubilee Fisheries	Vaerdal	124
Ocean Peace	Ocean Peace	220
O'Hara Corporation	Constellation	165
	Defender	124
	Enterprise	124
United States Seafoods, LLC	Seafreeze Alaska	296
	Legacy	132
	Alliance	107

Coop management

BUC activities are governed by a Board of Directors, which is appointed by BUC Members. Additionally, owners, captains, crew, and company personnel participate and provide input to the cooperative management process. The Members executed a cooperative agreement after extensive discussion and negotiation that outlines harvest strategies, harvest shares, and agreement compliance provisions. The agreement is amended as necessary to improve cooperative management of allocations and PSC, and to comply with regulatory programs.

The BUC Manager is responsible for the day to day management of the cooperative. This includes overseeing and providing communication among the fleet, member companies, and BUC staff, ensuring compliance with the BUC agreement and regulatory programs, tracking the BUC budget, coordinating Board meetings and BUC activities, ensuring harvest shares are distributed in a timely and accurate manner, and managing BUC office and staff. The Manager also completes all cooperative reporting requirements in a timely manner, including applying for annual catch allocations on behalf of BUC. Finally, the Manager coordinates with other staff on research, protected species issues, and community outreach to provide catch and operational transparency.

BUC also employs a full-time Data Manager. The Data Manager is responsible for tracking individual vessel catch and bycatch information relative to allocations, providing regular reports to the coop and individual vessel reports as requested, securely archiving data, identifying and resolving data errors, and working with the Alaska Region and Observer Program offices to ensure timely information streams. The Data Manager also provides Geographic Information System support and analysis as needed.

Finally, BUC members employ Seastate, Inc., which assists as a third party in management activities. Seastate, Inc. is the direct observer data link for many of the processes and activities described in this document, specifically, identifying bycatch issues and tracking historic catch and bycatch trends. Information provided by Seastate, Inc. is essential to the management of BUC allocations.

Harvest strategy

BUC has implemented several protocols and practices to maintain regulatory compliance and ensure allocations are not exceeded. These are described below.

Subsequent to receiving annual cooperative allocations, BUC and Seastate, Inc. staffs calculate individual vessel harvest shares and PSC limits. For each internal harvest share and PSC allocation, a reserve is established so that both individual vessels and BUC as a whole have a buffer that will be reached prior to the allocation limit. Vessels may not fish into their reserve without Member approval.

The BUC agreement also establishes a mechanism for Members to transfer quota among themselves. These transfers must be approved by the BUC Manager, and may be facilitated by BUC staff.

Catch monitoring

BUC receives data from several different sources. Generally, this includes total catch and species composition information from the North Pacific Groundfish Observer Program, Alaska Fisheries Science Center, total catch and species composition information from the Alaska Region, and production data from the Alaska Region. These data are used by NMFS to debit against quota accounts, and determine Groundfish Retention Standard compliance.

The BUC Data Manager receives observer data, which is archived in a database. The database allows the Data Manager to track various Amendment 80 quota accounts, bycatch amounts, catch of other non-Amendment 80 targets, and transfers between Members. The Data Manager uses the database to summarize catch information and distribute regular catch reports to vessels and BUC members. The Data Manager also performs routine data quality checks on observer data, and resolves any discovered errors with individual vessels and NMFS.

NMFS Alaska Region total catch information is provided to BUC staff on a secure website, and upon request by NMFS staff. As noted above, this information constitutes official BUC catch. As a quality control measure, the Data Manager compares these data with the corresponding observer data, and explores and resolves discrepancies.

In addition to receiving regular reports from BUC staff, Seastate, Inc. provides each Member and BUC staff access to a secure website. This webpage provides vessel owners with vessel-level catch information for GOA sideboarded species, Amendment 80 quota species, and other species of interest. Additionally, the Seastate, Inc. website displays information on vessel and cooperative GRS levels.

BUC vessels submit daily production reports through a NMFS software program called Elandings. Because NMFS uses production information to calculate an annual GRS, BUC also collects this information to keep a running tally of vessels' GRS'.

Observer information is transmitted from the vessel, to the Observer Program Offices at the Alaska Fisheries Science Center, then to the Alaska Region offices. Data undergoes initial error checking, and individual observer sample amounts are expanded to total catch amounts. During this process, these data are initially checked for errors. By the time Alaska Region catch information is available to BUC staff and vessel captains, it is two or three days old.

To address this delay, companies have purchased software packages that expand raw observer sample data to total catch amounts, and assigned catch amounts to quota categories. These data expansions are based on the same algorithms that NMFS uses to expand raw observer sampling data. This software allows vessel captains to analyze catch amounts on a real time basis, and make better fishing decisions to maximize harvest amounts while reducing individual vessel overage occurrences. To further check data accuracy, the Data Manager compares expanded data reported by Seastate, Inc. with expanded data produced by the software program.

To help ensure accurate quota accounting and compliance, NMFS requires vessels to implement an extensive monitoring package at their own expense:

- 200 percent observer coverage, nearly all hauls are sample
- Motion compensated observer scale
- Flow scale for weighing the entire catch
- No mixing hauls
- No fish on the deck outside of the codend
- Only one conveyor line at the point the observer collects a sample
- Each vessel must be certified to maintain one of three bin monitoring options
- Larger observer sampling station
- Vessel Monitoring System

The above list is collectively designed to improve accuracy and reduce bias. High quality catch estimates are important to BUC members and provide increased confidence in NMFS management information, thus facilitating inter-cooperative trades and quota management and oversight.

In addition to these increased monitoring requirements, BUC vessels and companies comply with recordkeeping and reporting regulations. While recordkeeping and reporting requirements are complex and create a significant burden to vessel captains and company representatives, these efforts create an authoritative, timely, and unambiguous record of quota harvested.

The Environmental Assessment/Regulatory Impact Review/Final Regulatory Flexibility Analysis prepared for regulations implementing Amendment 80 indicates that monitoring and catch accounting challenges are greater and more complex than other quota programs. To address these challenges and ensure quota limits are not exceeded, NMFS has required and BUC vessels have implemented the extensive and expensive monitoring program described above.

GOA sideboard management

Regulations limit Amendment 80 vessels to historic catch levels by establishing sideboard amounts for several species. To help manage GOA sideboard fisheries, BUC established a GOA fishing plan. The 2008 GOA fishing plan described management measures BUC utilized to ensure individual vessels had access to historical GOA catch amounts for Pacific cod, certain rockfish fisheries, and halibut PSC.

Amendment 80 sideboards are applied to all Amendment 80 vessels on aggregate. Several BUC vessels spend a significant portion of their time in the GOA. Non-BUC vessels have historically entered the GOA during the summer months to prosecute rockfish fisheries. While GOA seasonal or area-specific catch only includes BUC catch, NMFS may distribute catch information to BUC staff. However, when non-BUC vessels enter the GOA, confidentiality restrictions may prevent NMFS from distributing GOA catch information. BUC staff communicate closely with NMFS staff to manage GOA fisheries during these time periods.

Rockfish Pilot Program management

In 2008, several BUC vessels participated in the Rockfish Pilot Program Limited Access fishery. BUC staff communicated with NMFS to provide daily catch information in order to establish appropriate closure dates for Amendment 80 rockfish sideboards and the Rockfish Pilot Program catcher processor sideboards.

2008 BUC Catch

The following tables provide BUC catch. All data is rounded to the nearest whole number for reading simplicity. It's important to understand that fishing behavior and catch amounts under the first year of cooperative operations may not reflect those of subsequent years. Several examples are provided below.

BUC captains are concerned that individual vessel Pacific cod apportionments could severely constrain their ability to harvest other groundfish species. Therefore, in 2008, captains were conservative in their Pacific cod use, deciding to limit or eliminate Pacific cod directed fishing. For 2009 and subsequent years, captains will attempt to harvest more of their Pacific cod allocations, and BUC will likely harvest a much larger percentage of its allocation.

In 2008, ice conditions reduced large scale directed flathead sole fishing opportunities on traditional fishing grounds and during typical time frames. Additionally, halibut were generally found deeper than normal in 2008, and flathead sole were associated with higher halibut bycatch rates. To reduce overall halibut catch, BUC captains chose to fish for shallower species which contained lower halibut bycatch rates. In years where halibut are found in shallower water, or allocations for shallow water species such as yellowfin sole are constraining, captains may choose to increase flathead sole effort.

Bering Sea and Aleutian Islands BUC Allocated Quota and Catch Amounts

Species	BUC A80 Allocation (mt)	BUC Catch (mt)
Flathead	35,758	16,931
Cod (Total)	17,135	13,517
Rock Sole	47,003	34,982
Yellowfin Sole	98,982	84,853
POP 541	1,908	1,845
POP 542	1,984	1,941
POP 543	3,124	3,096
Mackerel 541	8,683	8,556
Mackerel 542	8,447	7,472
Mackerel 542 HLA	5,068	4,228
Mackerel 543	5,784	5,377
Mackerel 543 HLA	3,470	1,629

Bering Sea and Aleutian Islands BUC PSC Limits and Catch Amounts

Species	BUC A80 Allocation (mt)	BUC Catch (mt)
Halibut Mortality	1,837	1,293
King Crab Z1	78,631	48,931
Bairdi Z1	340,520	106,731
Bairdi Z2	580,311	211,792
COBLZ Opilio	1,632,432	286,781

Bering Sea and Aleutian Islands Salmon Catch Amounts

Species	BUC Catch (#s)
Chinook	329
Non-Chinook	1,225

Groundfish Retention Standard

In addition to beginning Amendment 80 operations, Amendment 79 required BUC to meet (GRS) requirements in 2008. The GRS and Amendment 80 require the cooperative to annually retain an annual percentage of groundfish relative to their overall Bering Sea and Aleutian Islands catch. The GRS is applicable to BUC in aggregate, and is phased in over a four year period according to the following table:

Groundfish Retention Standard	
GRS Schedule	Annual GRS
2008	65%
2009	75%
2010	80%
2011 and each year thereafter	85%

The GRS calculation is based on the proportion of groundfish retained. The GRS calculation numerator is the amount of groundfish retained over the course of a fishing year. Retained catch is reported by observers for each species. However, these estimates are not sampled, and are recorded visual observations. Therefore, NMFS determined that the most defensible measure of retention is to apply a standard product recovery rate (PRR) published in regulation (Table 3 to 50 CFR 679) to the weight of each species by product type. This amount is known as the round weight equivalent (RWE). Retained product weight is self reported by each vessel through a software program called Elandings.

The denominator of the GRS calculation is the total groundfish harvest by an Amendment 80 vessel over the course of a fishing year. Because vessels also catch non-groundfish species, NMFS and fishing companies must rely on observers to collect sub-samples from each haul. The proportion of groundfish in a sample is expanded to the total haul weight, as measured by a motion compensated flow scale, to estimate the total amount of groundfish in each haul.

The cumulative BUC GRS is calculated as the sum of all participating vessels' retained catch divided by the sum of all participating vessels' groundfish catch. ***For 2008, BUC achieved a GRS of 76.9 percent.***

Findings and Future Issues

GRS Issues

Under the GRS program, some BUC vessels have been required to retain smaller and less valuable groundfish species to remain compliant with implementing regulations. Therefore, BUC is keenly interested in ensuring that sampling and catch estimation techniques accurately represent actual catch composition, total catch weights, and production information. Bias in this process could force the retention of more low-valued product to meet the GRS than would otherwise be needed to meet GRS requirements if catch estimation were more accurate. Additionally, increased accuracy avoids overestimating quota species, and reducing fishing opportunities that would have otherwise been available.

Fishing under Amendment 79 began January 20, 2008. Vessel companies have typically tracked their product by species, and compared product weights with observed catch weights. Early in 2008, anecdotal information from fishing companies indicated that RWE amounts were sometimes less than observed catch amounts for those same species. Theoretically, these amounts should be equal. Furthermore, individual vessel GRSs calculated using the formula described in regulation creates concerns for a number of BUC vessels in anticipation of increasing retention standards. To address these concerns associated with GRS compliance, BUC is exploring ways to understand the source of these discrepancies to ensure that the GRS is functioning properly.

The following table shows BUC's 2008 retention performance for several different catch categories. The GRS is calculated for each catch category using formulas described in regulation. Although the GRS calculation does not use observer estimates of retained or discarded catch, this information is shown for comparison purposes. Observer retention estimates are reported for each sampled haul and for each groundfish species. However, observers make these estimates visually in a haphazard manner, and this information is considered low quality relative to other data sources.

Allocated target species are 77.6 percent of BUC groundfish catch, and BUC retained 83.2 percent of its allocated catch. Non-allocated species are subject to maximum retainable amount (MRA) regulations and comprise regulatory discards. They also include species which are open to directed fishing part of the year, and subject to MRA regulations the remainder of the year. These species represent 14.9 percent of BUC groundfish catch, and 68% of that amount was retained. Retention of unmarketable or low valued species displaces fish of any value. These species are 7.5 percent of BUC's overall groundfish catch, and 29 percent was retained. As described above, BUC achieved a 2008 GRS of 76.9 percent.

GroupDescription	Obs Total Catch	Obs est retained catch	Obs est discarded catch	Prod: Retained primary product RWE	Prod: Discarded	GRS Retained	Percent of Total GF
Allocated Target Species	201,925	195,420	6,505	168,026	22,197	83.21%	77.58%
Subject to MRA Regulations	38,843	32,187	6,655	26,452	9,600	68.10%	14.92%
Unmarketable/Low Value Species	19,526	7,975	11,554	5,684	14,947	29.11%	7.50%
Total Groundfish Catch	260,295						

Each component of the GRS equation is measured with some error. For example, scale weight is measured on a flow scale calibrated to ± 3 percent accuracy for a known weight, and for each reading of scale weight there is an opportunity for the reader to misread or misrecord the weight. PSC and non-groundfish catch weights are a function of observer estimates of species composition for each haul and are subject to varying degrees of precision dependent in part on the volume of the PSC and non-groundfish catch and the observer sample size. Product weight is typically estimated from an average case weight from all cases of that product type. Both the case count and the mean case weight are subject to measurement error. Finally, PRR, although currently treated as fixed without error, can vary from vessel to vessel, processing line to processing line, by season, by area, and by the same product for different species.

To explore the magnitude and direction of each of these potential error sources would be time consuming and expensive. However, BUC has begun conducting some pilot work to explore PRRs in the 2009 rock sole, Pacific cod, and yellowfin sole fisheries to better understand the discrepancies reported. This should initially inform BUC of differences between actual and NMFS standard PRRs, and provide a basis for further sampling if needed. Additionally, BUC may engage in other projects, collaboratively with NMFS if possible, to address GRS data quality concerns.

As retention requirements are increased through 2011, BUC is concerned that current GRS percentages may become economically impractical, and unattainable. In addition to the error sources listed above which factor into the GRS equation, BUC is concerned that the standards approved by the Council in 2005 were measured using different data than were required to create an enforceable GRS program. For example, the Amendment 79 EA/RIR/FRFA described historical retention rates for the Amendment 80 sector. Historical retention rates were based on “blend” data, which was used through 2003 to estimate total catch amounts.

The blend was a catch estimation process that incorporated observer data where possible, and vessel reported weekly production report (WPR). Historical groundfish retention estimates provided in the Amendment 79 EA/RIR/FRFA did not include many of the components required to create an enforceable GRS program. For example, these historical retention rates did not anticipate error changes associated with flow scales, PRRs, increases in observer coverage, etc.

Market Issues

PSC was not generally limiting to BUC vessels in 2008, and increased flatfish was put on the market. Global economic problems have resulted in decreased available credit and cash, therefore decreasing selling opportunities for BUC members. Pacific cod prices have been reduced by almost half from what they were in 2007. Decreased demand and increased supply has resulted in lowered flatfish prices. Additionally, increasing GRS retention requirements are anticipated to impact market supply, demand, and price.

Allocation Management

In 2008, BUC was not constrained by any of its PSC limit allocations and harvested 70.40 percent of its halibut allocation. However, as previously noted, fishing behavior, halibut distribution, and harvest under the first year of cooperative operations may not reflect those of subsequent years.

While under Amendment 80, vessel captains were able to slow fishing operations, and move from areas with higher PSC rates. The consensus from BUC vessel is that lower than normal halibut biomass was seen in typical head and gut fishing areas. Therefore, BUC is cautiously optimistic about this first year of cooperative operations. Higher PSC abundance on flatfish fishing grounds coupled with Amendment 80 halibut and crab PSC annual reductions, and changes to fishing patterns due to water temperatures, ice conditions, and/or climate change could result in future PSC constraints.

As of March 25, 2009, 411 tons of halibut PSC, or 29 percent of BUC's allocation was harvested¹. As of March 25, 2008, 271 tons of halibut PSC, or 15 percent of BUC's allocation was harvested. This represents a 52 percent increase from similar time periods. Similarly, as of March 25, 2009, 30,210 Zone 1 red king crabs, or 42 percent of BUC's Zone 1 king crab PSC allocation was harvested². As of March 25, 2008, 13,736 Zone 1 red king crabs, or 17 percent of BUC's Zone 1 red king crab PSC allocation was harvested. This represents a 119 percent increase from similar time periods. To avoid future constraints, BUC continues to look for opportunities to reduce its incidental PSC catch.

GOA Issues

As described above, BUC works closely with NMFS to manage GOA sideboard fisheries. However, during 2008, BUC discovered several constructs within the inseason management and catch accounting systems which affects BUC vessels' quarterly catch accounting. We would like to continue working to resolve the following inseason management ambiguities:

- The assignment of halibut to deep and shallow water complexes when a quarter ends in the middle of a week results in catch from the 1st quarter accruing towards the 2nd quarter. The effect of this is compounded by the fact that halibut does not roll from quarter to quarter as it does in open access.
- The methodology for assigning halibut to deep and shallow water complexes based on the observer's visual estimate of species retention rather than actual product complicates at-sea management.

¹ BUC's 2009 halibut mortality PSC was reduced by 44 mt from the 2008 amount.

² BUC's 2009 Zone 1 red king crab PSC was reduced by 4,286 individual animals from the 2008 amount.

- The “B” season directed cod fishery is managed according to an open access model that is no longer appropriate to the Amendment 80 fleet which is sideboarded on cod and halibut, is required to report production and discards daily, measures catch on flow scales, and has 100 percent observer coverage.

Research and Outreach

In addition to harvesting and processing activities, BUC is actively engaged in several projects to improve the natural and human environment affected by fishing operations. These are briefly described below.

Trawl sweep modification

John Gauvin works for BUC on environmental and scientific issues that affect BUC fisheries. Since 2006, he has been collaborating with Dr Craig Rose and other scientists from the Alaska Fisheries Science Center (AFSC) to modify groundfish trawls to reduce their effects on the benthic habitat. During testing in 2006 and 2007, elevating devices were added to trawl sweeps to raise the sweeps off the bottom, and reduce their contact with sessile seafloor animals and unconsolidated substrates. For most Bering Sea flatfish trawls, trawl sweeps are long (up to 1500 ft), and sweep 90 percent of the area between the trawl doors. Proposed modifications would attach 10 inch bobbins, or disks, every 90 feet to the trawl sweeps, raising the trawl sweep above the substrate allowing animals to pass underneath. In field testing, these modifications have proven effective at reducing effects on basketstars and sea whips, and did not substantially reduce catches of target flatfish. In June, the Council is scheduled to initially review an action to require these trawl sweep modifications for all Bering Sea flatfish trawling.

Reducing halibut mortality

BUC believes operating as cooperative increases incentives for individual bycatch accountability and optimal use of halibut bycatch mortality limits. BUC vessels now have a direct relationship between careful utilization of halibut bycatch mortality allowances and how much of their allocated and non-allocated target species are harvested. Therefore, BUC companies have begun discussing how to optimally utilize halibut excluders, reduce bycatch through data sharing, and reduce halibut mortality rates through improved fishing practices and halibut handling procedures.

Halibut bycatch mortality rates in flatfish and cod fisheries currently range from 70-80 percent. While these mortality rates are already quite high, BUC anticipates they will increase due to the Amendment 80 catch handling procedures. Discard halibut mortality rates are determined based on a three year rolling average of observed discard mortality rates. Data from the first year of Amendment 80 will become part of this three year rolling average starting in 2009. Because halibut mortality rates are likely to increase, and Amendment 80 halibut PSC limits will be

reduced by 50 mt over the next several years, BUC is committed to wisely using its halibut bycatch mortality cap.

The largest obstacle to reducing halibut mortality rates is the Amendment 80 catch handling requirements, which prevent sorting and removal of catch on deck prior to observer sampling. Observer sampling is nearly always conducted below deck as the catch comes into the processing area from the vessel's stern tank. After a tow, the contents of the net are dumped into the vessel's tank and sampling occurs as catch enters the processing area. Halibut and other PSC cannot be removed prior to observer sampling. Halibut near the back of the tank may not be discarded for up to two hours. The time needed to discard halibut has increased since Amendment 80 implementation because catch from different hauls can no longer be mixed. This means that fish from a new haul cannot be dumped into the tank and sorted until the tank is completely cleared of catch from the previous haul.

The intent of catch handling regulations is to allow for accurate estimations of catch including halibut bycatch. However, as a consequence halibut survival may be lower than what would be possible using a different approach to handling and accounting for halibut bycatch on Amendment 80 vessels.

BUC consulted with NMFS and the IPHC on an experimental fishing permit (EFP) to determine if halibut could be removed on deck, thereby decreasing the amount of time they are removed from the sea, and decreasing mortality rates. If approved, research conducted under the EFP would begin to assess how much halibut mortality rates could be reduced, what fraction of the halibut could be sorted out on deck, and how well alternative methods for accounting for halibut catches and mortality rates would work under modified procedures for handling halibut on Amendment 80 vessels. At their April meeting, the Council is scheduled to receive a staff presentation, and make recommendations on the EFP.

Community outreach

Because careful halibut bycatch management is so important to BUC's ability to harvest its target species allocations, BUC captains will always make decisions to avoid areas with high halibut rates. As high concentrations of yellowfin sole migrate across the Bering Sea shelf, BUC vessels follow these schools as they typically represent high catch per unit effort (CPUE) and low halibut bycatch. As the ice clears, large spawning schools of yellowfin sole congregate in very shallow water. At certain times of the year, these may be the only low bycatch areas. Displacement to other areas would result in higher CPUE, longer bottom times, increased costs, and additional habitat effects.

These shallow yellowfin spawning areas are sometimes adjacent to western Alaska communities. Community members have expressed concern to BUC and the Council about all vessel activities, and their affects on local commercial and subsistence harvests. Additionally, there have been gear conflicts in the area between large and small scale fishing operations, and claims of illegal

fishing. Because there are several different sectors that operate in these areas, and because BUC believes there have been misconceptions about BUC catch, operations, and trawl gear effects, BUC has proactively engaged in a community outreach and education program.

BUC representatives have traveled to several western Alaska communities to engage with community leaders. During trips to Nome, Bethel, Dillingham, and Anchorage, BUC met with representatives from Kawarak, the Association of Village Council Presidents, the Bristol Bay Economic Development Corporation, the Bristol Bay Native Association, the Qayassic Walrus Commission, and the United States Fish and Wildlife Commission. We discussed BUC operations under Amendment 80, provided catch information, and discussed research to reduce trawl effects to the benthic habitat. Additionally, we negotiated a regulatory closure to protect western Alaska subsistence resources in the Etolin Strait/Nunivak Island area, while still maintaining access to important flatfish fishing grounds.

Summary

The initial fishing year from was a learning process for BUC, highlighted by implementing a conservative approach to quota monitoring and management. This approach resulted in 2008 catch amounts below regulatory limits, and a GRS that exceeded minimum requirements. While BUC companies are pleased with these successes, they are concerned about future GRS requirements, market effects of the GRS, the effects of a depressed economy, and habitat and community interactions. BUC will continue to look for opportunities to address these challenges with NMFS and the Council.