

## GROUND FISH MANAGEMENT TEAM REPORT ON 2019-2020 BIENNIAL HARVEST SPECIFICATIONS AND MANAGEMENT MEASURES PLANNING

The Groundfish Management Team (GMT) notes that the decision-making schedule proposed in [Agenda Item F.7, Attachment 1, June 2017](#) is similar to what it has been since the 2013-2014 specification process when the front-loaded schedule was adopted. As the GMT has said in previous biennial cycles, the front-loaded process is dependent upon all deadlines being met in order to meet the January 1 implementation deadline; and even then, the January 1 target is very ambitious.

### **Front-Loaded Schedule Reminder**

The GMT would like to note that the most successful and complete biennial harvest specifications and management measure cycles have been those that allowed for the greatest amount of information to be ‘front-loaded.’ Over the past seven specification cycles, only two were implemented by January 1 of the first year.

In November 2010, in response to serious, chronic problems with achieving a January 1 start to the fishery as required in the groundfish Fishery Management Plan (FMP), the Council initiated a process to investigate solutions. The outcome of this exploration was to revise Council Operating Procedure (COP) 9 to include a more front-loaded schedule, develop a long-term impact analysis (i.e., the Tier Environmental Impact Statement), and establish default harvest control rules. Notable changes to the schedule included earlier decision-making on harvest specifications (starting in September with final action in April) and management measures (starting in September with final action in June).

### **Harvest Specifications Considerations**

The GMT notes the importance of completing the harvest specifications decisions as outlined in Attachment 1 by the November 2017 meeting. This will help facilitate development of the winter analysis and final Council action on the annual catch limits (ACLs) in April 2018, and management measures in June 2018.

### **Ongoing Agenda Items to Possibly Be Included**

Over the last several Council meetings, discussions led to the identification of three fairly complex harvest specification items which could be included in the biennial harvest specifications and management measures process. The three items are:

1. Mid-biennium ACL adjustments (a.k.a. “green light”) -- final action is currently scheduled for September 2017
2. Multi-year average catch policy, referred to by the GMT as “Flexibility in Management Response to Exceeding an ACL” ([Agenda Item F.5.a, Supplemental GMT Report, June 2017](#))
3. National Standard 1 (NS1) carryover provision

The required amount of impact analysis for each item individually, or in aggregate, is currently unclear. Clarification of the level of needed analysis may indicate how well these items fit with the biennial process. It is the GMT's understanding that the "green light" would not be available until the 2019 stock assessments; carryover would need to be completed for implementation by January 1 of the year of implementation; and flexibility in management response to exceeding an ACL (Agenda Item F.5) can be implemented at any time during the year. These timelines should be considered when deciding if any or all of these items should be incorporated in the upcoming analysis, or be scheduled for a separate rulemaking. The GMT reminds the Council that it was signaled under Agenda Item F.5. at this meeting that they intend to combine the flexible management approach and carryover for further scoping in September, which may provide further clarification on the analysis that will be necessary and whether these matters are a good fit for the 2019-2020 biennial process.

### **CalCOM Data Errors**

As noted in the Supplemental SSC report ([Agenda Item F.7.a. Supplemental SSC Report, June 2017](#)), errors were identified in the pre-1951 California catch streams (from the California Cooperative Groundfish Survey commercial groundfish database, or CalCOM) which may impact the most recent canary rockfish and chilipepper rockfish assessments. The models for both species need to be rerun using the corrected catch streams to develop revised harvest specifications. Given the presumed magnitude of the difference (i.e., doubling of catches prior to 1951), the Overfishing Limits (OFL) and associated ACL may change for 2018 and beyond. The GMT notes that the review and recalculations should be completed for the September Council meeting, to (1) provide sufficient time for any needed rulemaking or management measure adjustments for 2018, and (2) ensure that the corrected harvest specifications are available for the team's analyses over the winter for the 2019-2020 biennial harvest specifications and management measures. The SSC is recommending the review occur at the Groundfish Subcommittee meeting September 25-29 (mop-up panel) for Council consideration in November.

### **Sigma**

As noted in the Supplemental SSC report ([Agenda Item F.7.a. Supplemental SSC Report, June 2017](#)), two on-going research projects may inform the SSC recommendations for sigma ( $\sigma$ ), which is used to establish the uncertainty buffer for the acceptable biological catch (ABC). The completion dates for, and outcomes of, these projects are currently uncertain; however, the review is tentatively scheduled for the Groundfish Subcommittee meeting September 25-29 (mop-up panel) with SSC and Council consideration in November.

[Council Operating Procedure \(COP\) 9](#), specifies that sigmas are to be adopted in September of odd numbered years, so that presumptive ACLs are available for the GMT's October work session. If the ACLs are not available in October, then the team will not be able to develop a range of ACL alternatives, allocations (two-year alternatives or FMP allocations), and any potential management measures in time for the November Council meeting. **Therefore, the GMT recommends that if the SSC cannot recommend the new sigmas, and associated OFLs, at the September Council meeting for Council consideration, then the Council should delay incorporation of the new sigmas until the 2021-2022 harvest specifications.** The GMT believes that if sigmas and OFLs are delayed until November, the likelihood of implementing the new harvest specifications and management measures by January 1, 2019 will be greatly reduced.

**If the Council chooses to follow the SSC recommended timeline of adopting sigmas and associated OFLs in November, the GMT recommends a new schedule be developed.** The GMT discussed one option that would postpone our October meeting to sometime between the November and March Council meetings. The GMT could then present the associated analysis in March for the Council's selection of their preliminary preferred alternatives (PPAs) on harvest specifications and management measures, and select final preferred alternatives (FPAs) in June for both items (as opposed to harvest specifications in April). The GMT notes that while this pathway forward may be possible, the GMT has great concerns on the incorporation of any new management measures in March or April, as we will not have had time over the winter to analyze any previously proposed items. Additionally, March, and April, are salmon heavy meetings, therefore it may be difficult to add a lengthy groundfish agenda item to the Council's schedule. There may be other schedule modifications that could accommodate the delay in adopting sigmas.

### **Blackgill Rockfish Contingency Plan**

Due to the potential that the final rule for blackgill rockfish will not publish until after the completion of the 2019-2020 biennial harvest specifications and management measures development process, a contingency plan should be developed, similar to the what was done for blackgill rockfish in the [2017-2018 biennial harvest specification and management measure analytical document](#). The GMT anticipates that there will be additional workload to analyze both the Amendment 21 (contingency) and Amendment 28 allocations in the analysis.

## **Management Measures Considerations**

### **Seabird Mitigation Measures**

The Council is scheduled to receive a presentation on the new U.S. Fish and Wildlife Service (USFWS) biological opinion (BiOp) on seabirds in September. This schedule was intended to allow any potential seabird mitigation measures to be developed and analyzed during the 2019-2020 harvest specifications and management measures process.

However, as we mentioned in April ([Agenda Item F.5.a, Supplemental GMT Report, April 2017](#)), based on our experience developing the seabird mitigation measures for vessels greater than 55 feet, implementing new management measures may be more complex than could easily be accomplished as part of the 2019-2020 process. Recall that vessels larger than 55 feet are currently required to use streamer lines. At the time that the concept of streamer lines was developed, it was thought that implementation would be easier for larger vessels than small vessels based on the experience in Alaska. However, we learned that the Alaska approach was not a good fit for vessels operating off the west coast given that fishing operations here are different than they are in Alaska, and therefore this may not be a comparable measure.

In addition, there may be other alternative management measures that may be necessary for both large and small vessels. The GMT will recommend potential new management measures that might be analyzed during 2019-2020 harvest specifications process, or through an alternative process, after hearing the USFWS presentation in September.

### **Salmon mitigation measures**

The GMT understands that the National Marine Fisheries Service (NMFS) will form a new workgroup to develop reasonable and prudent measures to minimize the impacts of incidental take

salmon for the BiOp. Although there may be some overlap from that analysis that could result in efficiencies for what will be analyzed for 2019-2020 (e.g. time and area closures), other measures may need to be developed separately over the winter (e.g. sector caps). While the GMT as a whole is not planning to participate in the workgroup, several individuals from the GMT will likely participate. Additionally, the **GMT recommends that the entire GMT has the opportunity to review the reasonable and prudent measures and associated analysis once drafted by the workgroup**. A publicly noticed GMT webinar may be the best avenue for this to happen in between Council meetings.

### **New Management Measures**

The GMT notes that any new management measures proposed after November of this year could complicate or delay the process, and significantly reduce our ability to implement the harvest specifications by January 1, 2019. Therefore, **the GMT recommends that any new management measures, including sablefish and lingcod survival credits for the individual fishing quota (IFQ) fleet (Agenda Item F.3) and the removal of the 36° N. lat. for the IFQ allocation** (as described in [Agenda Item F.2.c, Supplemental CAB Report, June 2017](#)), **be given careful consideration by the Council in September on whether or not they should be included in the 2019-2020 cycle, or through some other process**. In preliminary discussions, the GMT has determined that the analysis associated with removal of the 36° N. lat. for the trawl allocation will be complicated and could result in a high workload, as it includes an analysis of coastwide annual vessel limits, aggregate limits, and other equity issues. In addition, the GMT is unsure if the benefits provided by the application of sablefish and lingcod survival credits for the IFQ fleet provide significant benefit compared to the expense of the anticipated workload.

### **Model updates**

In the Supplemental SSC statement, the SSC recommends reviewing the proposed yelloweye projection model at a webinar in August or September. After further discussions in the GMT, we believe that this model could be reviewed in November or March as it would not be needed for the analysis conducted over the winter, and would be a supplemental analysis to the biennial harvest specifications.

### **California Recreational Model**

At the April Council meeting it was noted that the California Recreational model may be revised, and depending on the revisions to be made may necessitate a SSC review. Though, it was also noted that any revisions may be limited to data updates, or other such routine updates which would not require SSC review.

### **Exempted Fishing Permits**

The GMT reminds of the importance of all exempted fishing permit (EFP) actions taking place in accordance with the schedules laid out through [COP-19](#), so that the anticipated impacts and analysis aligns with the biennial process. In order to analyze off-the-top deductions, including set asides necessary to conduct EFPs, new or continuing EFPs need to have their proposals submitted to the Council for preliminary analysis at the November Council meeting in odd years. Each application must identify where the potential impacts from activities conducted through the EFP come from (e.g. set aside, individual quota account). If additional set asides are required for the duration of the EFPs, they must be identified for consideration by the Council at the November

meeting. EFP proposals recommended for further consideration will be given final consideration at the June Council meeting.

### **Recommendations**

The GMT recommends:

- **if the SSC cannot recommend the new sigmas, and associated OFLs, at the September Council meeting for Council consideration, then the Council should delay incorporation of the new sigmas until the 2021-2022 harvest specifications**
- **If the Council chooses to follow the SSC recommended timeline of adopting sigmas and associated OFLs in November, the GMT recommends a new schedule be developed**
- **the entire GMT has the opportunity to review the reasonable and prudent measures and associated analysis for salmon mitigation once drafted by the workgroup**
- **any new management measures, including sablefish and lingcod survival credits for the individual fishing quota (IFQ) fleet (Agenda Item F.3) and the removal of the 36° N. lat. for the IFQ allocation given careful consideration by the Council in September on whether or not they should be included in the 2019-2020 cycle, or through some other process**

PFMC  
06/11/17